IRONWOOD FOREST NATIONAL MONUMENT

Proposed Resource Management Plan and Final Environmental Impact Statement *Revised* Appendix J Responses to Public Comments

BLM

Tucson Field Office

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APPENDIX J

RESPONSES TO PUBLIC COMMENTS

This appendix includes public comments on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Ironwood Forest National Monument (IFNM) and the Bureau of Land Management's (BLM's) responses to those comments. BLM provided the public with 90 days from the date of publication of the Notice of Availability (NOA) for the IFNM Draft RMP/EIS to review the plan and submit comments. The NOA was published in the Federal Register on March 2, 2007. The 90-day public comment period officially ended on May 30, 2007.

The National Environmental Policy Act (NEPA) and the Council on Environmental Quality regulations require that lead agencies evaluate comments received from persons who reviewed the Draft RMP/EIS and prepare a written response addressing the comments. Consistent with Title 40 of the Code of Federal Regulations Section 1503.4(b), all substantive comments will receive a response. Substantive comments are those that challenge the information in the Draft RMP/EIS as being inaccurate or inadequate or offer specific information that may influence BLM's decision. A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information in the EIS
- Questions, with a reasonable basis, the adequacy of environmental analysis as presented
- Presents reasonable alternatives, other than those presented in the Draft EIS, that meet the purpose and need of the proposed action and addresses significant issues
- Causes changes or revisions in the draft plan/document

Comments that express an opinion for or against the project are not considered substantive. Non-substantive comments simply state a position in favor of, or against, an alternative; agree or disagree with BLM policy; or otherwise express an unsupported personal preference or opinion.

COMMENT ANALYSIS PROCESS

A standardized content analysis process was conducted to analyze the public comments on the Draft RMP/EIS. Each comment letter, email, fax or transcript received was read by members of the planning team to ensure that all substantive comments were identified and coded to the appropriate subject category.

Each substantive comment was assigned a unique identification number and coded (associated) based on comment categories that generally coincide with the section headings from the Draft RMP/EIS. Comments were coded to the following categories:

1. Purpose of and need for the RMP
2. Alternatives
3. Air quality
4. Geology and cave resources
5. Soil resources
6. Water resources
7. Vegetation
8. Wildlife and wildlife habitat
9. Special status species
10. Fire ecology and management

11. Cultural resources
12. Paleontological resources
13. Visual resources
14. Wilderness characteristics
15. Energy and minerals
16. Livestock grazing
17. Recreation
18. Shooting
19. Lands and realty
20. Travel management
21. Special designations
22. Social and economic conditions
23. Public safety
24. Consultation and coordination

Once identified, each substantive comment was entered into a database to allow sorting based on topic. Comments are included both as verbatim either as they were submitted, or as recorded at public meetings or paraphrased to capture the essence of the comment in a more condensed format. In some cases, several persons offered a comment that was similar or identical to another substantive comment. These similar comments were grouped and paraphrased into a comment summary, and a summary response was prepared.

The comments were not weighted by organizational affiliation or status of respondents, and the number of duplicate comments did not add more bias to one comment than another. The process was not one of counting votes, and no effort was made to tabulate the exact number of people for, or against, any given aspect of the Draft RMP/EIS. Rather, emphasis was placed on the content of a comment.

COMMENT OVERVIEW

All comments were reviewed for occurrences of similarity or replication. Where different commenters provided comments that were similar in theme or a repeat of the same comment, a summary was developed to aid BLM in developing uniform responses. These comment summaries were each assigned a unique identification number (e.g., 1[SR434] for Category 1, Summary Response number 434). This database code indicates it is a BLM response addressing similar comments about the Purpose and Need for the RMP.

Five topic areas represented the majority of the comments received on the Draft RMP/EIS: (1) shooting, (2) travel management, (3) livestock grazing, (4) public safety, and (5) alternatives. The Record of Decision will present the decisions made by BLM, and reflects consideration of these public comments on the Draft RMP/EIS.

HOW TO USE THIS COMMENT-RESPONSE DOCUMENT

More than 100 identical letters were submitted by the members and affiliates of two organizations. Table J-1 summarizes the comments from those two letters and identifies the code number for the responses. As BLM reviewed and analyzed all of the comments, it determined that other parties also offered similar comments; consequently, BLM prepared a summary response to these comments, as indicated by the acronym SR (e.g., SR52). While the names of more than 10,000 persons who submitted letters with the comments shown in Table J-1 are not included in this EIS, the list of those commenters is available at the Tucson Field Office, 12661 East Broadway Boulevard, Tucson, Arizona, or on the project website (http://www.blm.gov/az/st/en/prog/planning/ironwood.html).

Table J-1 Identical Letter Summary and Index

Organization	Comment	Index Location of Comments/Responses
Center for Biological Diversity	The Ironwood Forest is no place to sustain cattle operations without serious long-term consequences. The BLM should err on the side of common sense and caution and administratively close the grazing allotments unless it can be proven not to be harming the resources. The RMP should allow for voluntary and/or compensated permanent relinquishment of these permits and should set some firm science-based ecological parameters for administrative closure.	16(SR52)
	Alternative B, which allows for 63 miles of roads through 90,360 acres, offers more than enough area to manage for off-road vehicle travel. In addition to minimizing the total miles of routes open to off-road travel, the BLM also has the responsibility to ensure that routes and trails avoid and/or do not cause disturbance to sensitive wildlife habitats and riparian areas. These noisy, polluting machines disturb wildlife, degrade air quality, spread non-native species, crush vegetation, accelerate erosion and are generally not compatible with the preservation of monument resources or values. The BLM must not cave to political pressure to allow of-road users broad access to this national treasure. Imposing strong limits on off-road vehicles will also help prevent the further proliferation of illegal, user-created wildcat routes.	20(SR150)
The Wilderness Society	The Monument contains nearly 37,000 acres with wilderness characteristics, as inventoried by the Arizona Wilderness Coalition and the BLM. Yet, the plan's preferred alternative would only manage 9,510 acres, or one-fourth of the eligible lands, for wilderness characteristics. I urge you to manage all wilderness quality lands in a manner that protects their unique and irreplaceable characteristics.	14(SR51)
	Current livestock grazing practices within the Sonoran Desert ecosystem have been proven to be destructive to natural and cultural resources. The draft plan proposes to maintain the same grazing patterns as before the Monument was created, thus allowing for continued degradation to Monument resources. Consistent with Monument designation, BLM should propose a grazing plan that reduces harmful impacts on the cultural and natural resources for which the Monument was designated.	16(SR52)

Table J-2 provides alphabetical guides to the location of comments provided by organizations and individuals. Table J-2 lists anonymous submittals as "Anonymous" if no name was associated with the comment or if BLM could not read the signature associated with submitted comments. Commenters who requested their name be withheld are listed in Table J-2 as "Withheld." To find a comment and the BLM response, locate the commenter's name (by individual or organization) in Table J-2 and turn to the index location listed. The identification number in parentheses after the index location identifies the comment-response pair and an asterisk indicates the comments which are not substantive.

As an example, Jo Adams submitted a letter (comment document 1155) that contains one identified comment. To read the BLM responses to Jo Adams' comment, first find the name in Table J-2, and look up the location of the comment. Then, turn to the Comment-Response Document Category 18, and to

comment-response pairs 18(SR 26), and repeat for multiple comments where applicable. Note that BLM responded to all of Jo Adams' comment in summary responses as indicated by the acronym SR (e.g., SR26). To read Ms. Adam's original comment letter, the comment documentation is available for at the BLM Tucson Field Office.

Commenter Index

The following table displays the names of the individuals, organization, businesses and governmental agencies who commented on the Draft RMP/EIS and the corresponding comment codes (shown following the names). Comment letters from the public that did not have a comment that required a response are not included in Table J-2.

Table J-2 Commenter Index

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
,		299	18(SR19)
,		435	18(SR28)
Adams, Jo		1155	18(SR26)
Adams, Lyle		369	18(SR2)
Adams, Lyle		480	18(SR2)
Adams, Warren		12228	8(SR261), 8(SR292), 17(SR105), 18(SR23), 24(128)
Adamson, Dennis B.		453	18(SR12), 24(SR16)
Aden, Landis	Arizona State Rifle & Pistol Association	11009	23(SR428), 24(SR84)
Aja, Basilio F.		577	24(SR75)
Alcock, John		849	18(SR26), 20(639)
Alderson, George & Frances		416	2(SR26), 2(SR703), 8(SR257), 8(SR259), 14(SR51), 16(SR52), 20(SR45), 20(SR607), 20(SR742)
Aldrich, Thomas L.	ASARCO	12227	1(450), 1(451), 1(SR223), 2(719), 2(721), 3(463), 3(464), 3(465), 3(466), 3(467), 3(SR468), 6(248), 6(251), 6(507), 6(766), 6(SR98), 6(SR252), 6(SR253), 7(222), 7(228), 7(230), 7(232), 7(233), 7(234), 7(512), 7(SR223), 7(SR224), 7(SR227), 7(SR229), 7(SR231), 8(600), 8(SR258), 8(SR261), 8(SR268), 8(SR270), 8(SR271), 8(SR291), 9(578), 9(586), 9(587), 9(706), 9(707)*, 9(SR350), 9(SR351), 9(SR352), 9(SR353), 9(SR354), 9(SR377), 10(206), 10(212), 11(684), 11(685), 11(735), 11(736), 12(133), 13(198), 13(207), 13(208), 13(SR35), 13(SR104), 14(114), 14(115), 14(SR116), 14(SR116), 14(SR286), 14(SR306), 14(SR308), 14(SR309), 15(385), 15(386), 15(387), 15(389), 15(474), 15(SR439), 15(SR477), 17(672), 18(SR21), 19(670), 19(675), 19(SR676), 20(91), 20(539), 20(748), 20(SR750), 20(SR759), 22(394), 22(399), 22(401), 22(403), 22(406), 22(SR397), 22(SR402), 22(SR404), 22(SR405), 22(SR500), 23(438), 23(SR456), 24(825)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Allen, John R.		800	1(185)*, 18(SR23)
Allen, John R.		117	18(SR23)
Altherr, Ron and Lois		11041	18(907)
Amavisca, Raul G.		103	18(SR2)
Andersen, Dennis		404	24(SR16)
Andersen, Lori	Friends of Ironwood Forest	1126, 11047	6(SR497), 7(SR808), 14(SR51), 16(SR52), 17(195)*, 19(SR73), 20(SR150), 23(SR62)
Anderson, Greta	The Arizona Native Plant Society	12182	7(SR235), 7(SR236)
Anderson, Greta	Center for Biological Diversity and others	12231	2(407), 2(SR52), 8(602), 8(SR267), 8(SR293), 8(SR298), 8(SR300), 8(SR301), 8(SR302), 8(SR303), 8(SR304), 9(585), 9(603), 9(SR355), 9(SR356), 9(SR357), 9(SR358), 9(SR359), 9(SR371), 10(209), 11(SR809), 16(326), 16(327), 16(328), 16(329), 16(332), 16(340), 16(489), 16(490), 16(491), 16(SR52), 16(SR53), 16(SR56), 16(SR58), 16(SR60), 22(395), 22(652)
Anderson, Greta	Center for Biological Diversity and others	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Anderson, Jan		1135	2(SR80)*, 17(SR74)
Anderson, Mark		1039	18(SR23)
Anderson, Roy S		400	18(SR2), 18(SR8)
Anderson, Wayne		132	18(SR2)
Ando, Robert		455	18(SR21)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Andrews, Tom		3814	16(SR53), 20(SR41)
Annonymous, Frank		287	18(SR19)
Annonymous, Paul		279	22(SR66)
Anonymous, Anonymous		1154	8(SR274)*, 14(SR51), 16(SR52), 18(SR26), 20(SR41)
Anonymous, Anonymous		487	18(SR12), 18(SR28)*
Anonymous, Anonymous		489	18(SR2), 18(SR20), 18(SR23), 18(SR28)
Anonymous, Randall		442	18(SR2)
Anspach, Mike		22	18(SR20)
Antue, Rebecca	ASA4WDC	11062	2(SR87)*
Ardmore, M.		1106	18(SR21)
Arnold, Terry		725	18(SR12)
Artley, Dick		7327	16(487), 16(SR52), 16(SR493)
Aspinwall J.D., Charles S.		1095	18(SR26)
Aussems, Nicolaas A.		32	18(SR12), 18(SR19), 22(SR66)
Awansen, Gary David		55	18(SR2), 18(SR12), 18(SR21), 24(SR15)
Awerkamp, Eric		129	18(SR2)
Ayala, Jr., Dom		500	18(SR19)
B, Linda		602	20(SR41)
Babcock, Elkanah		145	18(SR19), 18(SR21)
Babler, Steve		314	18(SR2)
Badillo, Humberto	AWC	11088	20(177)
Bahr, Sandy		1124	2(SR80)*, 2(SR88), 16(SR53), 19(SR73), 20(SR605)
Bahr, Sandy	Sierra Club - Grand canyon Chapter	12231	2(407), 2(SR52), 8(602), 8(SR267), 8(SR293), 8(SR298), 8(SR300), 8(SR301), 8(SR302), 8(SR303), 8(SR304), 9(585), 9(603), 9(SR355), 9(SR356), 9(SR357), 9(SR358), 9(SR359), 9(SR371), 10(209), 11(SR809), 16(326), 16(327), 16(328), 16(329), 16(332), 16(340), 16(489), 16(490), 16(491), 16(SR52), 16(SR53), 16(SR56), 16(SR58), 16(SR60), 22(395), 22(652)
Bailey, Richard Alan		378	2(700), 23(SR8)
Baker, Lance		151	2(SR65), 18(SR21), 18(SR23)
Baker, Ron		466	18(SR22), 18(SR25)
Baker, Susanne		1133	1(SR434), 15(103), 20(180), 20(564), 23(SR455)
Ballmer, Steve		879	18(SR20)
Barker, John		4752	16(SR53), 20(SR41)
Barlow, Jeffrey		1013	18(SR25)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Barnes, David		167	20(SR41)
Barnes, Rod		190	18(SR25)
Barnes, Russell		348	18(SR2)
Barrett, Linn		6041, 12196	16(SR53), 20(SR77) 1(SR148),14(SR51),16(SR52)
Barry, Donald T.		68	18(SR2)
Bartlett, Edward		11033	18(SR21)
Bartlett, Richard		689	18(SR28)
Bartlett, Richard		451	18(SR2)
Bengston, Peter		119	1(SR149), 2(SR80)*, 7(SR236), 9(SR10), 15(381), 18(SR26), 20(SR41), 21(SR81)
Bennett, Chuck		97	18(SR2), 20(SR14)
Bennett, John		108	18(SR2)
Benz, John	ETC Compliance Solutions	1253	18(SR23)
Berg, Thomas W.	NRA	80	18(SR2)
Berlin, Irv		11910	16(SR52)
Bernauer, Joe		206	18(SR25)
Bernstein, Allen		756	18(SR21)
Bernstein, David M.		377	18(SR2)
Berrier, James L.		36	18(SR19)
Bertelsen, David		428	14(SR51), 18(SR26), 20(SR742)
Bevan, John		218	18(SR2), 18(SR20)
Bieda, Family		19	18(SR19)
Bilbrey, Bruce M.		220	18(SR2)
Billick, Don		49	18(SR2)
Bincer, Dana		1032	18(SR21)
Bird, Paul		474	23(SR8)
Blackketter, Jeanne and Larry		510	18(SR20), 18(SR23), 18(SR25)*, 22(SR66)
Blaine, Charles T.		18	18(SR2)
Blake, Dave		92	18(SR902)
Blake, Eileen		1144	18(SR26)
Blakely, Regina		429	18(SR21)
Blanchard, Edward		365	24(813)
Blazej, Nova	United States Environmental Protection Agency	12221	2(840)*, 3(462), 9(584), 9(SR365), 15(SR439), 16(SR52), 16(SR53), 20(634), 20(641), 20(642), 20(643), 20(SR41), 20(SR605), 21(648)*, 21(SR772), 23(476)
Bleeker, Don & Becky		411	18(SR19), 18(SR20), 23(457)
Block, David		722	18(SR21)
Block, David L.		432	18(SR2)
Boes, Kevin		1156	18(SR12)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Bolesta, Murray	Friends of Ironwood Forest	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Booth, Norah		1034	18(SR26)
Borrell, Daniel		133	24(SR811)
Boswell, Art		343	18(SR21)
Bouck, Jerry		185, 1115, 12167	18(SR12), 20(SR42), 23(SR8)
Bouck, Jerry		502	20(SR42), 20(SR744), 22(SR66), 23(SR62)
Bowers, Russell “Rusty”	Arizona Rock Products Association	11093	13(205), 15(382), 15(383)
Bracy, Scott		478	18(SR2)
Brescia, Donald and Kathleen		345	20(SR744)
Brice, Jim		698, 699	23(SR427)
Bright, Coral		12201	1(473), 14(SR148)*, 16(SR52), 16(SR53)
Brister, Bob		859	20(SR41)
Britt, T.L.		403	13(199), 18(SR21), 23(SR428)
Broder, Charles		1194	18(SR26)
Brooks, Bruce		388	18(SR19)
Brown, Bob		270	18(SR2)
Brown, Don		394	18(SR21)
Brown, Howard		174	18(SR2)
Buatti, Peter		468	18(SR21), 18(SR22)
Bublitz, Richard		504	23(SR8), 23(SR59)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Bucanek, Fred		293	18(SR2)
Buck, Edgar C.		12170	18(SR23)
Buck, Edgar C.		12224	2(SR65)
Budzynski, Michael		497	2(SR2)*
Burgess, Stephen		280	18(SR20), 18(SR20)
Burks, Patty		1018	18(SR26)
Burmahln, John C.		1075	2(SR709), 18(SR37)
Burton, David W.		372	18(SR2)
Cafferata, Edward		501	18(SR19), 18(SR23)
Cain, Daniel		495	18(SR21)
Calkins, Glenn E.		205	18(SR20), 22(SR66)
Calvert, Charles		482	18(SR8), 18(SR21), 18(SR23), 23(432)
Campbell, Carolyn	Coalition for Sonoran Desert Protection	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Campbell, John A.		79	18(SR28)
Canatsey, Lana		168	18(SR2)
Careton, Gerald A.		393	18(SR21)
Carle, Ronald H and Mary		67	1(17)
Carlton, Gloria		3475	16(SR53)
Carpenter, Linda		274	2(701), 18(SR23), 18(SR28), 23(SR8), 23(SR64)
Carpenter, Troy D.		29	18(SR20)
Carroll, Charles A.		386	18(SR12), 20(SR14)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Carroll, Randall		1059	18(SR28), 22(SR66)
Carroll, Randall Wm.		807	18(SR28), 22(SR66)
Carroll, Randall Wm.		130	18(SR2), 22(SR66)
Cartwright, J.M.		380	18(SR2)
Cary, Nathan		1078	23(SR455)
Casey, David		390	18(SR21)
Cauton, Pierre M.		69	18(SR29)
Cervantes, Baldy		184	18(SR23), 23(SR8)
Chapdelain, Mike		159	18(SR21)
Chapman, Bert		488	18(SR8), 18(SR23)
Chase, Robert		1496	14(SR51), 16(SR52)
Chastain, Mark		334	18(SR19), 23(SR8)
Cheves, G.K.		189	18(SR2)
Chiantaretto, Harry & Lola		207	18(SR19), 18(SR38)
Chilian, Dick		320	18(SR2)
Chisholm, Keith		219	18(SR2)
Chivers, Billy		507	18(SR2)
Clark, Festus		476	18(SR8)
Clark, Jaqueline		140	18(SR2)
Clark, Leo		1101	2(SR8)
Clark, Sondra A		1221	18(SR23)
Clary, John		1249	18(SR25)
Clausson, David B.		88	18(SR23), 23(SR62)
Clewell, Salvatore		254	18(SR2)
Cline, Fred		696	23(SR64)
Coffern, Al		47	18(SR2)
Cole, Steven		191	18(SR2)
Coleman, Ron & Jill		368, 433	18(SR2), 18(SR25), 22(SR66)
Coleman, Ron & Jill		446	22(SR66)
Collins, Shawn		604	18(SR20)
Coniglio, Jim		164	23(SR59)
Conroy, Roger T.		601	2(704), 2(705), 2(SR8), 18(SR21), 18(SR23), 18(SR26)
Cook, David		572	24(SR75)
Cooper, Lutricia A.		14	18(SR2)
Coping, Cindy		1245, 1187, 12180	5(SR201)
Coping, Cindy		1021, 1022, 1247, 1185, 2880	1(420), 1(SR434), 18(SR23), 18(SR26), 8(SR259), 18(SR20), 18(SR38), 18(SR39), 20(SR42)

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Coping, Cynthia		11089	24(SR75)
Coping, Cynthia P.		573, 11049, 12193	24(SR75), 1(143), 1(421), 1(479), 2(715), 2(724), 5(SR201), 6(110), 6(111), 6(245), 6(249), 6(276), 6(SR247), 6(SR250), 7(518), 7(519), 7(SR223), 7(SR242), 7(SR338), 7(SR768), 8(SR299), 9(SR377), 9(SR378), 11(SR739), 13(210), 14(SR286), 16(319), 16(320), 16(321), 16(322), 16(324), 16(325), 16(337), 16(339), 16(343), 16(746), 16(SR54), 16(SR55), 16(SR335), 16(SR338), 16(SR342), 16(SR492), 17(158), 17(190), 19(666), 20(534), 20(535), 20(536), 20(538), 20(572), 20(624), 20(650), 20(747), 20(752), 20(756), 20(757), 20(758), 20(762), 20(763), 20(764), 20(765), 20(769), 20(784)*, 20(785), 20(786), 20(794), 20(805), 20(806), 20(SR42), 20(SR162), 20(SR533), 20(SR745), 20(SR750), 20(SR751), 20(SR753), 20(SR760), 20(SR761), 20(SR858), 20(SR917), 20(SR918), 20(SR919), 20(SR920), 20(SR921), 20(SR922), 20(SR923), 20(SR924), 22(393), 22(396), 22(522), 22(651), 22(SR499), 22(SR500), 23(440), 23(SR8), 23(SR64), 24(496)*, 24(819), 24(SR84)
Coping, Cynthia P.		413	8(255), 8(576), 8(SR258), 8(SR263), 8(SR264), 8(SR288), 8(SR290)
Correll, Richard		456	24(SR16)
Cosgrove, Harry		441	18(SR20), 18(SR27)
Coulter, James A.		1100	18(SR23)
Craig, Keith		831	18(SR21)
Crause, David		111	18(SR20)
Crawford, Brian		173	2(SR88)
Crout, Vernon J.		257	18(SR2)
Daniels, Larry		277	18(SR21)*
Daniels, Lee and Gail		840	18(SR2)
Daniels, Patrick		41	18(SR19), 23(SR8), 23(SR62)
Daughtry, Dave		10975	18(SR12), 23(SR8)
Davidson, Bob		438	18(SR2)
Davies, Margaret		1172, 12220	14(SR51), 16(SR52), 20(SR150) 1(SR148),14(SR51),16(SR52)
Davis, Augusta		1196	18(SR26), 20(SR41)
Deckard, Ralph		445	18(SR12), 24(SR16)
Demski, Robert		232, 12166	8(SR259), 18(SR12), 18(SR19), 20(771), 20(SR14), 23(SR429), 18(SR911)
DeMuth, Lynn		150	18(SR26), 20(SR41), 21(SR81)
Deo, Lyle		11044	18(SR21)
Deo, Lyle A.		12194	18(SR23)
Deo, Lyle A.		11077	18(SR21), 23(SR8)
Dew, Michael E.		417	20(638), 20(SR14), 23(SR62)

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Dezelan, Dennis		11022	22(SR66)
Dible, Craig		10968	1(447)
Dick, John H.		251	18(SR2)
DIMIN, LEE S.		12211	14(SR51), 16(SR52), 20(SR150)
Ditler, Larry		1151	17(SR58)*, 17(SR74), 20(SR14), 20(SR40)*
Dodge, Alexander		392	18(SR12)*
Dolan, Brian	Arizona Desert Bighorn Sheep Society	11018	24(SR75)
Dorsey, James H.		376	18(SR19)
Downing, Elaine and Kenneth		1073	1(182)*, 18(SR25)
Drews, Gus and Barbara		1019	18(SR26)
DuHamel, Jonathan		576	24(SR75)
Dutko, Judy		471	18(SR2)
Dwyer, Ken		139	18(SR21)
Dybus, Don		337	2(SR2)*
Eaton, Mr. and Mrs. David W.		25	24(SR15)
Eckstat, Arthur		1060	18(SR25), 18(SR28)
Edmonds, Michael		1142	20(166), 23(SR64)
Edwards, Anne		153	23(SR427)
Edwards, Richard		583	16(SR52)
Edwards, Richard and Anne		76, 992	1(SR149), 8(SR256), 20(SR41), 21(SR81), 18(SR25), 23(SR427)
Edwards, Robert		58	18(SR2)
Eldridge, William		11061	23(SR62), 23(SR428)
Elgin, Francis		5	18(SR2)
Emerine, Steve		574	24(SR75)
Esquivel, Adelina		12174, 12175	18(SR23)
Facista, George		629	18(SR25)
Faurot, William R.		123	18(SR21)
Fetterman, James V.		269	18(SR2)
Figueroa, Emilio	Silverbell allotment	11019	20(SR753), 24(SR75)
Fitzhugh, Lee	WFCB, University of California, Davis	1157	18(SR26)
Flack, Charles		259	18(SR2), 23(SR62)
Fleck, Doyle		678	18(SR25)
Flessa, Karl		1227	18(SR26)
Flett, Ron		308	2(SR26)*
Flood, Tim J.		171	2(SR88)*, 11(653), 14(SR51), 18(SR26), 20(SR605)
Flowers, Bobbie Dee		6134	16(SR52)

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Foley, Michael W.		12229	18(SR21), 18(SR903)
Ford, David A.		702	18(SR28)
Foutz, Larry		95	18(SR19)
Franckowiak, Paul		845	20(SR41)
Franklin, Greg		812	18(SR25)
Franklin, Greg		135	18(SR25)
Franklin, Keith		1104	18(SR25)
Franklin, Keith		509	18(SR2)
Freeman, Nancy		1206	1(SR434), 16(SR52), 18(SR26), 20(SR41)
Fuhrer, Fred		124	18(SR12), 18(SR25)
Fverst, William R.		425	18(SR21), 18(SR23)
Gaffney, David		165, 11055, 12222	24(SR837), 9(575), 18(SR38), 24(814), 18(SR26), 18(SR90), 20(532), 23(SR8)
Gafvert, Dave		767	18(SR24)
Galbraith, Tim		230	18(SR25)
Gardner, Mike		631	23(SR8)
Garono, Peter		1017	18(SR8), 23(SR8), 23(SR429)
Garrett, M. Lee		599	2(712)
Garrett, M. Lee		971	2(700)
Garrity, Bill		1128	14(SR51), 16(SR52), 20(SR605), 23(SR455)
Garske, Steve		1222	18(SR26)
Garvin, Tim		735	18(SR23)
Garvin, Tim		250	2(SR702), 18(SR19), 18(SR23)
Geer, James L.		427	18(SR2)
Gegetod, Michael R.		125	18(SR23)
Gellenbeck, Terrence		968	20(SR41)
George, Lawrence W		1230, 12206	18(SR23)
Gerszewski, Donald		39	18(SR2)
Gettier, Al		475	18(SR2)
Gibson, Jim		989	23(SR8), 23(SR429)
Gilbert, Philip		472	18(SR20)

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Gilllespie, Allen and Marcheta		12193	1(143), 1(421), 1(479), 2(715), 2(724), 5(SR201), 6(110), 6(111), 6(245), 6(249), 6(276), 6(SR247), 6(SR250), 7(518), 7(519), 7(SR223), 7(SR242), 7(SR338), 7(SR768), 8(SR299), 9(SR377), 9(SR378), 11(SR739), 13(210), 14(SR286), 16(319), 16(320), 16(321), 16(322), 16(324), 16(325), 16(337), 16(339), 16(343), 16(746), 16(SR54), 16(SR55), 16(SR335), 16(SR338), 16(SR342), 16(SR492), 17(158), 17(190), 19(666), 20(534), 20(535), 20(536), 20(538), 20(572), 20(624), 20(650), 20(747), 20(752), 20(756), 20(757), 20(758), 20(762), 20(763), 20(764), 20(765), 20(769), 20(784)*, 20(785), 20(786), 20(794), 20(805), 20(806), 20(SR42), 20(SR162), 20(SR533), 20(SR745), 20(SR750), 20(SR751), 20(SR753), 20(SR760), 20(SR761), 20(SR858), 20(SR917), 20(SR918), 20(SR919), 20(SR920), 20(SR921), 20(SR922), 20(SR923), 20(SR924), 22(393), 22(396), 22(522), 22(651), 22(SR499), 22(SR500), 23(440), 23(SR8), 23(SR64), 24(496)*, 24(819), 24(SR84)
Ginkins, E.E.		104	18(SR23)
Glebocki, Jeffrey M.	Strategy + Action Consulting, LLC	1149	18(SR26)
Goetter, Steve		1069	18(SR25)
Goetter, Steve		309	18(SR9)*
Gola, Anthony		8527	16(SR53), 20(SR41)
Goode, Robert	NRA	77	18(SR2), 24(SR494)
Goodman, Phil		295	18(SR2)
Graffagnino, Maryann and Frank		12210	20(618), 20(SR607)
Gray, Douglas		113	18(SR21)
Green, Michael J.		757, 827, 833	18(SR28)

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Green, Paul	Tucson Audubon Society	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Greenfield, Gene		397	16(SR52), 20(SR636), 23(SR8), 23(SR428)
Greer, Monette, Brian, and Tyler		781, 782	18(SR29)
Gregory, Barbara		1195	18(SR26)
Griffith, John		490	18(908)
Griffiths, Matt		1132	2(SR88)
Groseta, Andy	Arizona Cattle Growers Association Federal Lands Committee	609	24(SR75)
Guenien, Le		391	18(SR2)
Guenier, Gena		398	18(SR2)
Gueniero, Mary Ann		399	18(SR2)
Guenther, Herbert R.	ADWR	12230	6(112)
Guerie, L		414	18(SR2)
Gustafson, Jon		247	18(SR2)
Gutman, M.		289	18(SR2)
Gutman, M.		362	18(SR2)
H, Will J.		61	18(SR20)
Haebig, Gary		1219	18(SR23)

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Hague, Lynn		588	14(SR51), 16(SR52), 18(SR26), 20(SR41), 20(SR637)
Hahman, W. Richard	Hahman & Associates Geological Consultants	12185	18(SR19), 18(SR20), 18(SR21)
Hall, Charles L.		210	18(SR2)
Hanceford, Phil	BLM Action Center, The Wilderness Society	12216	2(SR720), 11(691), 11(692), 11(693), 11(SR809), 16(330), 16(331), 16(344), 16(345), 16(SR52), 16(SR53), 16(SR56)*
Hansen, Terry		86	18(SR2)
Hanson, Marilyn	Sonoran Desert Weedwackers	11082	16(SR52)
Hardy, James		1084	18(SR25)
Hardy, James		85	18(SR21)
Harrington, Michael F.		717	18(SR29)
Harstad, Ruthanne		1216	20(SR41)
Hart, Dean G.		479	22(SR66)
Hatcher, Warren		1097	2(SR708), 17(191)*, 20(609), 20(610), 21(277)
Haueisen, John and Steffanie		465	18(SR20)
Hawk, Bryan		57	18(SR2)
Hay, Stephen		158	18(SR2)
Hay, Sydney		12226	1(SR477), 13(SR35), 13(SR216), 15(SR70), 22(400), 22(SR402)
Hays, Ti	National Trust for Historic Preservation	10924, 12218	11(SR727), 11(SR737), 20(SR616), 20(SR625), 11(682), 11(SR30), 11(SR734), 11(SR738), 20(550), 20(552), 20(780), 20(SR551)
Heaps, Caryn Logan		1171	7(SR808), 16(SR52), 18(SR26), 20(SR41), 21(SR78)
Heathman, E. Stanley		65	18(SR28), 18(SR29)
Heinz, Reed W. & Margaret M.		252	18(SR846)
Heller, Charles		155, 160, 11063	18(SR21), 2(SR65), 18(SR12)
Hempel, John	BLM	1260, 1143	18(SR21), 18(SR24)
Hemry, Jerald and Debra D.		93	2(SR2)*
Henderson, Michael C.		175	18(SR2)
Hennings, Charles R.		10	18(SR25)
Henry, Jerrold		180	18(SR19), 18(SR21), 18(SR23), 18(SR27), 23(SR428)
Hernbrode, Bob	AZGF Commission	11058	18(SR28), 24(815)
Herro, Alan A.		37	18(SR2)
Hewitt, Tim		91	18(SR23)

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Higbee, Mike		253	1(SR61), 18(SR2), 18(SR19)
Hilliard, Bernard		261	18(SR19), 18(SR25)*, 18(SR25)
Hoag, Cori		11029	23(SR455)
Hoffman, Sean		11042	2(711), 18(SR24)
Hoffman and Family, Sean		1152	18(SR8), 18(SR21), 18(SR23), 18(SR24)
Holleman, Margaret		1163	18(SR26)
Hollenbeck, Gary C.		35, 1113	18(SR19)
Hollett, Carry		181	18(SR19), 18(SR23)
Holt, Tim		12197	18(SR26)
Holthaus, Maurice		1188	18(SR23)
Hoover, Mary		1131	2(SR80)*
Hopkins, Richard R.		645	18(SR12)
Horton, John		1049	18(SR28), 22(SR66)
Houser, B		1166	18(SR26)
Hover, Violet		1023	18(SR26)
Hoyt, Jr., Earle B.		839	22(SR69)
Huerstel, Gerald J.		12204	18(SR21)
Huff, Larry	Southwest Transmission Cooperative, Inc.	12219	19(677), 19(SR665), 19(SR668), 19(SR669), 19(SR671), 19(SR674), 20(555)
Hughes, James A.		283	18(SR2), 18(SR28)
Humphrey, Michael W.		296	18(SR12), 18(SR19)
Hutson, W. Gay		276	18(SR2)
Hutton, Hutton		1225	23(SR8)
Hyatt, Ron		370	18(SR2)
Hyatt, Ron		118	18(SR2)
Ihly, R.		1103	22(SR66)
Jacobs, Sky		12203	16(SR53), 23(SR8), 23(SR427)
James, David		363	18(SR2), 22(SR66)
Jarrett, PhD, James		430	17(192)*, 17(409)
Jasmer, Shelby		1121	14(SR51)
Jensen, Pamela		12202	14(SR51), 16(SR53), 20(SR77)
Jernigan, Marcus	Sierra Club	1137	8(SR280), 14(SR116), 16(SR52)
Jernigan, Marcus		11045	2(SR88), 20(SR151)
Jeter, Author R.		684	18(SR25)
Johns, DD		836	18(SR20)
Johnson, Al		1207	18(SR21), 18(SR23), 18(SR25)
Johnson, Al		755	18(SR21)
Johnson, Albert L.		50, 12207	18(SR21), 18(SR23)
Johnson, Brenda	Office of Environmental Affairs Program	2877	5(101), 6(244)
Johnson, Dean		818	23(SR62)

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Johnson, Dennis L.		402	18(SR19), 18(SR25)
Johnson, Ernest G.	Arizona Corporation Commission	12225	19(664), 19(SR665)
Johnson, Theresa		774	20(SR41)
Jones, Dan		183	2(SR8)*, 23(SR8)
Jones, Scott	Sierra Club	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Julian, Victor	Mergard	1191	18(SR8)
Kack, Jason R.		34, 238	18(SR2)
Kaping, Tim		763	18(157)
Kesicki, James T.		12208	18(SR19)
Kidd, Roger		709	18(SR19), 18(SR25)
Kilbride, Harold		473	18(SR22), 18(SR25)

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Kile, Ed and Arlene		12193	1(143), 1(421), 1(479), 2(715), 2(724), 5(SR201), 6(110), 6(111), 6(245), 6(249), 6(276), 6(SR247), 6(SR250), 7(518), 7(519), 7(SR223), 7(SR242), 7(SR338), 7(SR768), 8(SR299), 9(SR377), 9(SR378), 11(SR739), 13(210), 14(SR286), 16(319), 16(320), 16(321), 16(322), 16(324), 16(325), 16(337), 16(339), 16(343), 16(746), 16(SR54), 16(SR55), 16(SR335), 16(SR338), 16(SR342), 16(SR492), 17(158), 17(190), 19(666), 20(534), 20(535), 20(536), 20(538), 20(572), 20(624), 20(650), 20(747), 20(752), 20(756), 20(757), 20(758), 20(762), 20(763), 20(764), 20(765), 20(769), 20(784)*, 20(785), 20(786), 20(794), 20(805), 20(806), 20(SR42), 20(SR162), 20(SR533), 20(SR745), 20(SR750), 20(SR751), 20(SR753), 20(SR760), 20(SR761), 20(SR858), 20(SR917), 20(SR918), 20(SR919), 20(SR920), 20(SR921), 20(SR922), 20(SR923), 20(SR924), 22(393), 22(396), 22(522), 22(651), 22(SR499), 22(SR500), 23(440), 23(SR8), 23(SR64), 24(496)*, 24(819), 24(SR84)
King, Bob		248	18(SR2)
King, Frederick		361	18(SR19)
King, Kenneth J.		16	18(SR19)
King, Pat	Pima NRCD	11059	16(341), 16(480), 24(SR75), 24(SR828)
Knisley, Joe and Sue		1223	18(SR8), 18(SR23), 23(SR8)
Kobialka, Jan and Gayla		589	14(SR51), 18(SR26), 20(SR41), 20(SR637)
Kohnke, Karl C.		260	18(SR19)
Kokjohn, Tyler		2878	1(445), 20(SR616), 24(126)
Kokjohn, Tyler		11071	1(SR149), 2(SR87), 11(SR734), 14(SR51)
Kolakowsky, Mark		713	20(SR14)
Koppinger, Doug		999	17(SR74), 18(SR21), 18(SR26), 20(755), 20(SR41), 23(SR62)*
Kraniak, Robert		8	18(SR197)*
Krayer, Barry		1530	20(SR14), 21(141)

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Krentz, Susan		575, 12193	24(SR75), 1(143), 1(421), 1(479), 2(715), 2(724), 5(SR201), 6(110), 6(111), 6(245), 6(249), 6(276), 6(SR247), 6(SR250), 7(518), 7(519), 7(SR223), 7(SR242), 7(SR338), 7(SR768), 8(SR299), 9(SR377), 9(SR378), 11(SR739), 13(210), 14(SR286), 16(319), 16(320), 16(321), 16(322), 16(324), 16(325), 16(337), 16(339), 16(343), 16(746), 16(SR54), 16(SR55), 16(SR335), 16(SR338), 16(SR342), 16(SR492), 17(158), 17(190), 19(666), 20(534), 20(535), 20(536), 20(538), 20(572), 20(624), 20(650), 20(747), 20(752), 20(756), 20(757), 20(758), 20(762), 20(763), 20(764), 20(765), 20(769), 20(784)*, 20(785), 20(786), 20(794), 20(805), 20(806), 20(SR42), 20(SR162), 20(SR533), 20(SR745), 20(SR750), 20(SR751), 20(SR753), 20(SR760), 20(SR761), 20(SR858), 20(SR917), 20(SR918), 20(SR919), 20(SR920), 20(SR921), 20(SR922), 20(SR923), 20(SR924), 22(393), 22(396), 22(522), 22(651), 22(SR499), 22(SR500), 23(440), 23(SR8), 23(SR64), 24(496)*, 24(819), 24(SR84)
Kroeger, Karl		40	18(SR21)*
Krogh, Robert B.		136	18(SR20)
Kuhn, Jason		44	18(SR2)
Kulikowski, Kathie		850	24(SR16)
Kulman, Mike		783	18(SR25)
Kurtz, Roberta		863	20(SR41)
La Zarr, H.		106	18(SR23)
Lafferty, Teresa		395	18(SR23)
Lagrave, Louis J.		641	18(SR21)
Laird, Bill		339	18(SR2)
Langley, Michael		792	18(SR28)
Lantz, H. L.		268	18(SR20)
Lantz, Ron		7584	17(775), 18(SR25), 24(124), 24(SR494)
Lash, Cal		667, 1108	14(SR51)
Lashway, Alan		503	18(SR25)
Lathrop, Paul		633	2(SR8)*
Lebinan, Bill		59	18(SR19)
Ledogar, Frederick		492	18(SR25)
LeRoy, Jim		1047	22(SR66)
Levick, Lainie		1197	2(SR80)*, 7(SR235)*, 14(SR51), 16(SR52), 20(SR150)
Lewis, Even J.		243	18(SR20)
Lewis, Tom		744	1(SR147)*
Liessmann, Jim		635	18(SR20)
Lizotte, Geoff and Kristin		1250	18(SR26)

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Logan, William		297	18(SR19), 22(SR66)
Long, Daniel E.		340	18(SR12), 18(SR25)
Lopez, Kathy		566	7(SR808), 21(SR78)
Loudon, Clayton		193	18(SR25)
Lowe, Ryan		199	18(SR2)
Lucci, P.		789	18(SR20)
Luis, Laurian M.		964	18(SR25)
Lutz, David A.		1140	18(SR21), 23(443), 23(SR61), 23(SR455)
Lynn, Steven W.	Tucson Electric Power Company	12214	19(667), 19(SR665), 19(SR668), 19(SR669), 19(SR671), 19(SR674)
Mac, Sara		855	18(SR26), 20(SR41)
MacDonald, Michael R.		464	18(SR1)*
Mackey, Malcolm		84	18(SR2), 18(SR19)
Maddox, Greg		947	18(SR25), 22(SR66)
Madys, May		89	18(SR2)
Maicuel, Jack		4	18(SR1)*
Maier, Karen		743	18(SR21)
Marley, Chris		99	18(SR8), 18(SR23)
Martinez, Adrian		998	18(SR25)
Maryan, Colin C.		152	18(SR27)
Maslen, Del		332	18(SR2)
Mathisen, Warren		816	18(SR20)
Mathisen, Warren		244	18(SR25)
Mattausch, Dave	Concerned Outdoor Recreation Enthusiasts	11030	9(583), 23(441)
Mattei, John P.		329	18(SR2)
McBride, Kenneth		112	24(810)
McCaleb, Gary S.		1150	2(SR65), 18(906), 18(SR24), 18(SR36), 23(442)
McClure, Beau	Arizona Chapter, Public Lands Foundation	1031, 11092	18(SR21)
McCotter, Chris		11024	14(SR310), 17(414), 17(SR105), 20(161), 23(SR8), 24(123)
McCutcheon, T.K.		351	18(SR2)
McDowell, Don		335	18(SR20)
McGee, Alan L		452	18(SR25)
McGibbon, Andrew	Pima Natural Resource Conservation District	12191	24(817), 24(818)*

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McGibbon, Andrew	Pima Natural Resource Conservation District	12233, 12234	1(426), 1(SR916), 3(472), 5(217), 5(218), 5(219), 5(220), 5(221), 6(SR250), 7(520)*, 7(SR238), 7(SR242), 7(SR768), 8(SR261), 8(SR274), 8(SR275), 8(SR292), 9(SR366), 9(SR367), 9(SR368), 9(SR369), 9(SR370), 9(SR372), 9(SR373), 10(214), 10(SR468), 14(SR286), 16(483), 16(486), 16(503), 16(SR54), 16(SR57), 16(SR482), 16(SR485), 16(SR488), 16(SR492), 16(SR502), 17(193), 17(774), 18(SR28), 18(SR29), 20(781), 20(SR42), 22(SR501), 23(436), 23(SR8), 24(SR828), 24(SR832), 24(SR833), 6(767), 24(836)
McGibbon, Micaela		11066	2(SR87)*, 16(316), 16(SR54)
McKinney, George		194	18(SR20), 18(SR847)
McLean, William H.		177	18(SR19), 18(SR28)
McLeod, Lu		458	18(SR25)
McMorine, Thomas E.		216	23(SR8)
McMurray, Melvin and Maggie		23	18(SR2)
McPherson, R L		12209	18(SR21)
McWilliams, Laura		282	18(SR21)
Meador, Red		665	18(SR26)
Medow, Lawrence		434	18(SR9)*, 18(SR19), 18(SR21)
Meenk, Richard		437	18(SR12)
Melang, Robert A.		144	18(SR23)
Menweg, Ralph		264, 265	18(SR28)*
Meyer, Ralph		1164	18(SR26)
Michlin, Shelby		1162	18(SR26)
Miett, Roy		821	18(SR23)
Milford, Victor		81	18(SR2)
Miller, James		439	18(SR2)
Miller, James		461	18(SR20), 18(SR25), 22(SR66)
Miller, Jon		1153	18(SR26)
Miller, Linda		1042	18(SR26), 20(SR636)
Miller, Mike		82	18(SR2)
Miller, Richard W		1029	18(SR26)
Millet, Saralaine		1119	14(SR116), 16(SR52), 20(SR41), 20(SR44)
Mingledorff, Neil		1173	18(SR26)
Moffett, Charles		156	2(SR65), 24(812)
Montgomery, Rita		1129	7(SR242)*, 14(SR51), 16(SR53), 18(SR26), 20(608)
Moore, Duaine		116	18(SR8)
Moore, Paul A		459	18(SR25)
Mootz, Joseph A.		605, 608	17(SR278), 20(SR41), 20(SR46)*, 20(SR47), 18(SR26)

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Mootz, Joseph A.		209, 212	17(SR278), 20(526), 20(565), 20(SR41), 20(SR47), 18(SR26), 20(527)
Moran, Rocky		325	18(SR9)*
Moran, Rocky		223	18(SR2)
Moritz, Robert		291	18(SR28)
Morrison, John		814	18(SR21)
Morrison, John A.		28, 215	2(SR2)*, 18(SR21), 18(SR2)
Morse, Sr., James B.		384	18(SR8)
Moss, Archie		1089	22(SR66)
Moter, Heather		1136	2(SR88), 18(SR26), 23(433)
Mueller Ph.D., R.F.	Virginians for Wilderness	1180	20(SR41)
Muir, William		326	18(SR2)
Munson, Richard		288	8(SR259)*, 18(SR20)
Murphy, Dennis		10997	2(714), 18(SR20), 18(SR36), 24(SR83), 24(SR811)
Murphy, Dennis		11050	18(SR25), 24(SR811)
Murr, James		1050	18(SR12)
Murr, James		131	1(SR419), 18(SR27), 20(174), 20(SR14)
Murr, James	MetaSwitch	949	1(SR419), 18(SR27), 20(164)
Myers, Kevin		481	18(SR12)
Namihas, Matthew		236	18(SR2), 18(SR19)
Navratil, Thomas M.		143	18(SR23), 18(SR24)
Nehring, Scott		11064	18(SR21)
Nelson, Edward A. and Louise E.		1045	20(SR41)
Nemec, Joe C.		421	18(SR19), 18(SR21)*, 20(SR41)

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Nero, Heath	The Wilderness Society	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Nettlow, Roger A.		51	18(SR2)
Newman, Donna		1214	18(SR26)
Newton, R.		2891	23(SR8)
Nezelek, Vaughn		1139	16(SR57), 18(SR21), 20(SR14)
Nichols, Lanny		1218	2(SR85), 18(SR26)
Nicoletti, Gene		226	18(SR2), 18(SR19)
Nielsen, Dale		11	1(184)*
Nipperus, Norm		798	18(SR28)
Nipperus, Norm		115	18(SR28), 23(SR8)
Noggle, Carl		154	18(SR26)
Norman, Bill		697	18(SR25)
North, Louis J.		354	18(SR21)
Not provided, Not provided		292, 1067	18(SR19), 18(SR25)
Not provided, Not provided		1082	18(SR22)
Not Provided, Not Provided	Whiting Corporation	981	18(SR25)
Not Provided, Not Provided		1006	18(SR25)
Nunez, Hugo A.		313	18(SR21)
O'Brien, Tom		245	18(SR21)

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Ochoa Sr., Francisco J.		852	18(SR156)
Odom, John M.		166	18(SR20)
Offerson, Eric		321	18(SR2)
Offerson, Eric		974	18(SR25)
Oldani, John		483	18(SR2)
Olson, John		11032	23(SR131)
Olson, Lynn		1158	18(SR26)
Ortega, Tom		371	18(SR25)
Ostrander Jr., Arthur		249	18(SR2)
Owen II, Charles William		228	18(SR2), 18(SR25)
Owens, Gilbert		134	18(SR2)
Owens, Robert		469	18(SR9)*, 18(SR25)
Pagni, Lee		1130	2(SR80)*, 14(SR51)
Pagni, Lee		1254	20(SR79)
Palmer, Richard L.		241	18(SR2)
Palmer, Robert D.		122	18(SR19)
Palmer, Ron		346	23(SR8)
Pamperin, John		995	1(458), 20(SR742)
Parlee, Kimberly		11035	20(SR605), 20(SR613)
Patten, Steve and Dee		841	16(SR53)
Patterson, Daniel	Public Employees for Environmental Responsibility	12231	2(407), 2(SR52), 8(602), 8(SR267), 8(SR293), 8(SR298), 8(SR300), 8(SR301), 8(SR302), 8(SR303), 8(SR304), 9(585), 9(603), 9(SR355), 9(SR356), 9(SR357), 9(SR358), 9(SR359), 9(SR371), 10(209), 11(SR809), 16(326), 16(327), 16(328), 16(329), 16(332), 16(340), 16(489), 16(490), 16(491), 16(SR52), 16(SR53), 16(SR56), 16(SR58), 16(SR60), 22(395), 22(652)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Patterson, Daniel	Public Employees for Environmental Responsibility	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Paulds, John A.		255	18(SR1)
Pepka, Albert P.		637	18(SR20)
Pershing, Donald		396	23(SR8), 23(SR428)
Peters, Jack and Peggy		1027	18(SR23)
Peters, Louis		506	18(SR22)
Peterson, Dean M.		13	18(SR20)
Phillips, John H.		237	18(SR2)
Picart, Alex		358	18(SR22)
Pike, Allen		192	18(SR20)
Polacek, Donald		318	18(SR12), 18(SR28)
Pool, John		484	18(SR20)
Poole, Bill		1232	18(SR36), 23(SR8)
Porro, Bob		505	18(SR2)
Pressly, Jerry		407	18(SR2)
Pringle, Thomas		10970	2(710), 16(317), 16(318), 16(SR52), 17(410), 20(SR44), 20(SR644)
R., A.		127	18(SR24)
Rader, John		137, 1110	2(SR2)*
Rader, John	SASS (Single Action Shooting Society)	11043	23(SR8)

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Raeber, Rick and Debra		862	18(SR21), 20(SR14)
Rathner, Todd		162, 162, 11052	18(SR2), 18(SR20), 24(SR83)
Ray, Gordon E.	G.E.R. Construction Co.	225	18(SR2)
Ray, James		304	18(SR12)
Recce, Susan	National Rifle Association of America, Institute for Legislative Action	12212	18(SR20), 18(SR21), 18(SR23), 18(SR25), 18(SR27), 18(SR28), 18(SR36), 18(SR90), 23(431), 23(437), 24(SR811)
Reckweg, John F		1041	18(SR21)
Reed, Dennis		381	18(SR2)
Reed, Jon M.		679	18(SR21)
Regula, William A.		460	22(SR66)
Reis, Kurt D.		847	18(SR23)
Richard, Wells		10974	18(SR21)
Richards, T. A.		11039, 11079	18(SR25)
Rickard, David A.		963	18(SR25)
Ricker, David T.		406	1(446), 18(SR19), 23(SR62), 24(155), 24(SR16)
Rivera, Jose’		1094	18(SR23)
Roberts, Marion and James		42	18(SR2)
Robinson, Jim & Liz		593	9(SR50)*, 14(SR51), 18(SR26), 20(SR41), 20(SR77), 20(SR637)
Robinson, William C.		256	18(SR20), 20(SR41)
Robinson, William S.		258	18(SR2)
Rogers, B.		60	18(SR19)
Rogers, Susan		1138	2(SR88)
Rogers, Susan L and Wm. E.		1010, 1009	18(SR26), 20(SR636)
Rogers, Tom		17	18(SR2)
Rogers, Virginia M.		1026	18(SR26)
Rogers, Jr., William E.		1134	2(SR88), 17(SR74)
Rohlik, Lenny		422	18(SR19), 18(SR23), 20(SR14)
Rome, Gil		988	16(SR52), 18(SR26), 20(SR77)
Roulanaitis, Jesse		48	18(SR19)
Rowe and Family, Jeff		962	18(SR23), 18(SR24)
Ruane, Catherine		1118	2(SR88), 20(SR150)
Runge, Bruce A.		12217	1(435), 18(SR21)
Rush, Paul		141	18(SR23)

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Ruske, Paul and Kelly		96	18(SR22), 24(SR16)
Russo, Mike		957	16(SR53), 18(SR26), 20(SR41), 22(SR69)
Russo, Philip		1065	18(SR25)
Ryberg, Eric	Western Watersheds Project	12231	2(407), 2(SR52), 8(602), 8(SR267), 8(SR293), 8(SR298), 8(SR300), 8(SR301), 8(SR302), 8(SR303), 8(SR304), 9(585), 9(603), 9(SR355), 9(SR356), 9(SR357), 9(SR358), 9(SR359), 9(SR371), 10(209), 11(SR809), 16(326), 16(327), 16(328), 16(329), 16(332), 16(340), 16(489), 16(490), 16(491), 16(SR52), 16(SR53), 16(SR56), 16(SR58), 16(SR60), 22(395), 22(652)
Ryberg, Erik	Western Watersheds Project	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Saba, Don		11054	18(SR12), 23(SR8), 24(SR83)
Salisbury, Larry		353	18(SR2)
Sandlin, Betsy		982	16(SR52), 20(SR41)
Sanford, Bill R.		330	18(SR23)
Sapp, Robert V. and Sharon F.		146	18(SR2)
Savlove, John		4095	16(SR53)
Scar, Dick		1189	18(SR26)
Schaal, Randy		284	18(SR21)
Schaub, John & June		105, 1111	18(SR2)

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Schlink III, Theodore A.		43	18(SR2)
Schroeder, Fred		447	18(SR2)
Schubert, Derek		1256	18(SR26)
Schulte & family, Gary		1147	18(SR20), 23(SR430)
Schutt, Bruce		224	18(SR22), 18(SR23)
Schwartz, Ivy		1002	18(SR26), 20(SR41), 20(SR605)
Schwartz, Michael B.		860	18(SR26), 20(SR41)
Schwarz, Kurt R.	Howard County Bird Club	1259	8(SR290), 16(SR53), 20(176)
Scott, Rich		302	18(SR20), 18(SR23)
Self, Clint		239	18(SR2)
Shade, M.D., Betsy		415	14(SR51), 18(SR26), 20(SR45), 20(SR637), 23(SR427)
Shea, James		1125	2(SR62), 2(SR88), 23(SR8), 23(SR427)
Sherman, Elmo C.		305	18(SR21)
Shroufe, Duane L.	The State of Arizona Game and Fish Department	12213	6(102), 6(246), 7(237), 8(601), 8(SR261), 8(SR282), 8(SR294), 8(SR295), 14(SR279), 14(SR287), 14(SR311), 14(SR312), 17(411), 17(SR105), 17(SR412), 20(547), 20(548), 20(623)*, 20(779), 20(SR530), 22(392), 24(820), 24(821), 24(822), 24(823), 24(824)
Shults, Larry M.	Environmental Solutions LLC	610	18(SR21)
Shumaker, Jon		11010	1(SR434), 1(SR498), 3(459), 4(99), 4(132), 5(107), 6(109), 6(SR243), 7(241), 7(568), 7(SR224), 8(SR226), 8(SR258), 8(SR260), 8(SR290), 9(577), 10(203), 10(213), 11(196), 11(460), 11(654), 11(655), 11(656), 11(657), 11(659), 11(728), 11(729), 11(730), 11(731), 11(SR30), 13(200), 13(204), 13(SR216), 16(SR52), 17(SR74), 19(661), 19(662), 19(663), 20(172), 20(528), 20(566), 20(754), 20(SR605), 22(140), 23(SR8), 23(SR62), 24(118), 24(119), 24(120), 24(122), 24(134), 24(816)
Shumate, Russ		11083	18(SR37)
Sides, J.Q.		46	18(SR25)
Siegrist, Toni		11404, 12168, 12190	16(SR53), 20(SR644) 1(SR148),14(SR51),16(SR52)
Siler, Randall		278	18(SR21)
Silvernail, Donald		824	18(SR21)
Singleton, John		6568	16(SR53)
Singleton, Rick		121	18(SR8), 18(SR24)
Sinyard, Donald		454	22(SR66)
Sirvent, Esq., Francisco P.		711	18(SR21), 18(SR901)

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Sivek, B.A.		126	18(SR23)
Slaughter, Tom		262	18(SR8), 23(SR8)
Slawson, Thomas		1004	1(444), 14(SR51), 20(SR41)
Smallhouse, Chuck		11068	16(SR54), 23(SR8)
Smith, Zach		128	18(SR2)
Sollid, Jon E.		234	18(SR2)
Sovkoplas, Gregory		78	18(SR20), 18(SR25), 23(SR62)
Sperling, Herbert		423	1(138)
Sprankle, Ed		229	18(SR2)
Staab, Tim		1081	18(SR25)
Staab, Tim		662	18(SR12)
Steinhart, Raymond C.		373	18(SR2), 18(SR12)
Stevens, Cal		753	18(SR25)
Stevens, Karyn		747	18(SR25)
Stewart, C.A.		178	18(SR21), 20(SR743)
Stewart, Jeff	Southern Arizona WIldlife Callers, Inc.	11034	23(SR8)
Stewart, William R		176	2(SR2)*
Stokes, Wallace		21	18(SR2)
Stowers, Ron		101	2(145)
Strng, Marie-Claire P.		1025	18(SR26)
Strong, Tim		316	18(SR2)
Struebel, Mark		11040	5(202)
Sublett and Joseph Currie, Mathew L.		830	18(905), 18(SR8), 18(SR23)
Surmik, Stephen & Joann		281	1(183)*, 18(SR20)
Svancara, Greg		11046	24(SR16)
Swartzell, Mark		448	1(SR453)
Sweet, Gary		736	18(SR25)
Swenka, Scott		322	24(SR16)
Szydelko, Larry		405	18(SR20), 18(SR23), 23(SR428)
Tagler, P.M.		777	18(SR20)
Talosi, George		541	18(SR23)
Taylor, George Zachary		431	18(SR2), 18(SR21), 24(SR15), 24(SR18)*
Taylor, Taylor		1212	18(SR26)
Taylor, Tom		1122	9(SR50)*, 14(SR51), 16(SR52), 20(SR150)
Tetreault, Rheal	Arizona State Association of 4 Wheel Drive Clubs	1145	20(611), 20(SR613)
Thame, John P.		12199	2(713), 18(SR23)
Thomas, Hugh D.		12198	23(SR8)
Thomas, Roger L.		114	18(SR2)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Thompson, Charlie		303	18(SR23)
Thompson, Craig		806	18(SR25)
Thompson, Craig		217	18(SR22), 18(SR25)
Thornton, William C.		11081	7(240)
Threet, Esq., Sterling R.		688	18(SR20)
Tlapa, LJ		708	18(SR25)
Tolson, Tim		379	18(SR2)
Torry, John		138	18(SR21)
Traynor, John		336	18(SR19), 18(SR20), 18(SR25)
Treleven, Dennis		4897	14(SR51), 16(SR52)
Trowbridge, David G.		829	18(SR23)
Tyndall, Allen W.		62	18(SR23)
Unreadable, Unreadable		182	18(SR8), 18(SR23)
Vaaler, Jim		1127	7(SR808), 9(SR10), 11(678), 14(617), 18(SR30), 20(SR41)
Vaaler, Jim		172	9(SR10), 9(SR10), 14(SR51), 18(SR26), 19(660), 20(606), 20(SR41), 21(SR78)
Vailik, James T.		401	18(SR2)
Valentine, Wendy		1209	18(SR26)
Van Hemelych, Tim		66	18(SR21)*
Van Wettering, Paul		30	23(SR62)
Varnado, T.D.		508	18(SR2)
Vernon, Greg and Jackie		12193	1(143), 1(421), 1(479), 2(715), 2(724), 5(SR201), 6(110), 6(111), 6(245), 6(249), 6(276), 6(SR247), 6(SR250), 7(518), 7(519), 7(SR223), 7(SR242), 7(SR338), 7(SR768), 8(SR299), 9(SR377), 9(SR378), 11(SR739), 13(210), 14(SR286), 16(319), 16(320), 16(321), 16(322), 16(324), 16(325), 16(337), 16(339), 16(343), 16(746), 16(SR54), 16(SR55), 16(SR335), 16(SR338), 16(SR342), 16(SR492), 17(158), 17(190), 19(666), 20(534), 20(535), 20(536), 20(538), 20(572), 20(624), 20(650), 20(747), 20(752), 20(756), 20(757), 20(758), 20(762), 20(763), 20(764), 20(765), 20(769), 20(784)*, 20(785), 20(786), 20(794), 20(805), 20(806), 20(SR42), 20(SR162), 20(SR533), 20(SR745), 20(SR750), 20(SR751), 20(SR753), 20(SR760), 20(SR761), 20(SR858), 20(SR917), 20(SR918), 20(SR919), 20(SR920), 20(SR921), 20(SR922), 20(SR923), 20(SR924), 22(393), 22(396), 22(522), 22(651), 22(SR499), 22(SR500), 23(440), 23(SR8), 23(SR64), 24(496)*, 24(819), 24(SR84)
Voigt, Norman W.		324	18(SR2)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Voigt, Ron		12169	18(SR26)
Waite, Daniel		360	24(770)
Walker, Michael T.		26	18(SR2)
Wanamaker, Clela		440	18(SR20)
Wandrey, Ralph		273	18(SR20)
Ward, Rachelle		1064	18(SR23)
Warren, May		12223	2(SR65)*, 18(SR21), 23(SR62), 23(SR428)
Watson, James R.		10217	18(SR23)
Watt, B.C.		94	18(SR19)
Webb, Michael Travis		317	18(SR19)
Webber, Richard E.		227	18(SR2)
Weidman, James		793	18(SR21)
Welch, Roger C.		27	18(SR19), 20(SR14), 23(SR429)
Welsh, Frank		1217	16(SR52), 20(SR41)
Wernz, Celeste		772	16(SR53), 18(SR26), 20(SR41)
Wetherbee, Duane		11056	23(SR8)
White, Willard S.		436	18(SR2)
Whyman, Thomas R.		83	18(SR19)
Wilkinson, Rick		1063, 1066	2(SR702)
Wilkinson, Rick		312	2(SR702)
Williams, Daniel E.		620	18(SR20)
Williams, Hal		1255	7(SR808), 20(SR150), 22(SR69)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Williams, Jason	Arizona Wilderness Coalition	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Williams, Keller		813	18(SR20)
Williamson, Jeff	Arizona Zoological Society	12231	2(407), 2(SR52), 8(602), 8(SR267), 8(SR293), 8(SR298), 8(SR300), 8(SR301), 8(SR302), 8(SR303), 8(SR304), 9(585), 9(603), 9(SR355), 9(SR356), 9(SR357), 9(SR358), 9(SR359), 9(SR371), 10(209), 11(SR809), 16(326), 16(327), 16(328), 16(329), 16(332), 16(340), 16(489), 16(490), 16(491), 16(SR52), 16(SR53), 16(SR56), 16(SR58), 16(SR60), 22(395), 22(652)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Williamson, Jeff	Arizona Zoological Society	12232	1(422), 1(423), 1(SR149), 1(SR425), 1(SR434), 1(SR498), 2(718), 2(723), 2(SR62), 2(SR88), 2(SR434), 2(SR497), 2(SR722), 7(187), 7(511), 7(514), 7(515), 7(516), 7(569), 7(SR225), 7(SR235), 7(SR510), 7(SR808), 8(262), 8(593), 8(599), 8(SR265), 8(SR273), 8(SR281), 8(SR290), 8(SR510), 9(581), 9(582), 9(SR360), 9(SR361), 9(SR362), 9(SR363), 9(SR364), 10(211), 11(690)*, 11(SR737), 11(SR738), 14(117)*, 14(622), 14(646), 14(773), 14(SR51), 14(SR313), 14(SR314)*, 14(SR315), 17(194), 17(413), 17(415), 17(416), 17(417), 17(418), 17(SR425), 18(SR26), 19(673), 19(SR674), 20(168), 20(171), 20(175), 20(540), 20(557), 20(559), 20(560), 20(561), 20(562), 20(563), 20(626), 20(628), 20(630), 20(631), 20(633), 20(778), 20(SR605), 20(SR625), 20(SR632), 20(SR859), 20(SR860), 20(SR861), 20(SR862), 20(SR863), 20(SR864), 20(SR865), 20(SR866), 20(SR867), 20(SR868), 20(SR869), 20(SR870), 20(SR871), 20(SR872), 20(SR873), 20(SR874), 20(SR875), 20(SR876), 20(SR877), 20(SR878), 20(SR880), 20(SR881), 20(SR882), 20(SR883), 20(SR884), 20(SR885), 20(SR886), 20(SR887), 20(SR888), 20(SR889), 20(SR890), 20(SR891), 20(SR892), 20(SR893), 20(SR894), 20(SR895), 20(SR896), 20(SR897), 20(SR898), 20(SR899), 20(SR900), 22(SR397), 24(SR826)
Williamson, Jeff	Arizona Zoological Society	11048	1(SR149)
Wilson, Bob		20	18(SR2)
Wilson, Jean E.		675	24(SR494)
Wilson, Kim		861	18(SR26)
Wilson, Oliver R.		1001	18(SR25)
Wing, Ronald C.		865	1(186)*
Wingert, Bret		272	17(408)
Winkelman, Gordon C.		163	18(SR12)
Wintrode, Bill T.		837	18(SR22)
Wischmeyer, AJ		1120	2(SR88), 7(SR808), 14(SR51), 16(SR52), 20(SR41), 20(SR150)
Wise, Wendy		1123	18(SR26)
wolf, cynthia		978	18(SR26)
Wolf, Dave		739	18(SR25)
Wong, Sam		10977	23(SR8)
Wood, William		1099	18(SR25)
Woodland, Peter		161	18(SR21)
Workman, Bruce		6	18(SR2)
Wright, Quinn		240	18(SR2)
Yettaw, Liland		387	18(SR2)

Commenter Corrected	Organization	Submission ID	Location of Comments/Responses
Yost, Jon		9	18(SR19), 18(SR20)
Young, Irving S.		1228, 1226	18(SR12), 18(SR21), 18(SR20)
Ziemann, Lowell A.		357	18(SR9)*, 18(SR19)
Zimmerman, Harry		12	18(SR2), 23(SR59)

Note: The asterisk identifies the non-substantive comments where a response is not included in Appendix J.

Response to Comments

Category 1: Purpose of and Need for the Resource Management Plan

1(17)
Comment: Would it be that there is a massive land grab in place that the BLM wants to use to give big developers or some other business a break and further destroy our pristine wild area of Arizona?
Response: IFNM is on Federal land that has been established under Presidential Proclamation for the purpose of preserving, protecting, and managing the unique natural and cultural resources that lie within. There is no intent to turn IFNM lands over to private developers because this would impede the protection and preservation mandates.

1(138)
Comment: On the issue of banning recreational shooting in the Ironwood Forest National Monument, I have a hard time understanding how BLM can regulate control or otherwise manipulate land in the state of Arizona or any other state.
Response: BLM operates under 43 CFR and the FLPMA. Land administered by the BLM is land held in trust by the Federal Government for the people of the United States. On behalf of the people, BLM is mandated by law to manage the public land, its resources and various values for multiple uses that sustain the land and its resources for the long-term needs of future generations. Within the boundaries of the IFNM, BLM does not manage or propose to manage lands owned by the State of Arizona (administered by the ASLD). BLM's decisions apply only to Federal surface and mineral estate, as described in Section 1.2 of the document.

1(143)
Comment: The Proclamation requires the BLM to protect the objects of the monument, not to preserve them. Appendix D states that the BLM will work with the State of Arizona water authorities to create an MOU to "preserve" the resources mentioned in the Proclamation. Attempting to "preserve" any objects of the monument may violate the FLPMA multiple use mandates and exceeds the intent of the Proclamation. All occurrences of the word "preserve" must be removed from the Final Resource Management Plan.
Response: The requirements in BLM's organic act, FLPMA, include to "preserve and protect certain public lands in their natural condition." Preservation of resources managed by BLM is implicit in the Act.

1(420)
Comment: Use the word, "boundary" when referring specifically to the boundaries of federal lands that make up the Monument. Use the word "perimeter" when referring to the outer Monument perimeter, which encloses federal monument lands and non-federal, non-monument lands.
Response: In Section 1.2 of the RMP/EIS, BLM defines the Federal lands (surface and subsurface) that make up the IFNM as the decision area; all lands within the outer IFNM perimeter are defined as the planning area. No changes have been made to the document with respect to these definitions.

1(421)
Comment: We request the BLM add to this Resource Management Plan a prohibition of wild horses and burro introductions within IFNM.
Response: As stated in Table 2-5, BLM would evaluate and implement proposals to enhance wildlife populations in coordination with AGFD through reintroductions, transplants, and supplemental stockings, consistent with BLM policy. There are no wild horse or burro ranges within the IFNM; therefore Objective 11 does not apply to the IFNM. However, there are free-ranging wild burros and horses in Arizona, and there is a remote chance that feral equines could migrate or disperse into the IFNM in the future. This objective provides the BLM a means to remove or manage any wild burros or horses that may

enter the IFNM in the future. There is no statement in the RMP that burros or horses will be imported into the IFNM. A statement has been added to the objective to clarify that wild horses and burros do not currently exist within the IFNM.

1(422)
Comment: In an effort to assure resources are available to finance monitoring and mitigation, the final RMP and proposed action should request that the agency post a performance bond financed through fees, use and privilege assessments, paid by all who benefit from the landscape, in amounts sufficient to offset all costs driven by use to include education, law enforcements, monitoring and mitigation.
Response: It is beyond the scope of the RMP process for BLM to post a performance bond to finance implementation of the RMP. Though BLM has attempted to develop goals, objectives, and management actions that can be achieved, staffing and/or funding could influence the timing of such achievement.

1(423)
Comment: The BLM must also identify areas where enforcement of legal uses in compromised [sic] by illegal activities and modify management with provisional guidance to address the inability to adequately monitor or enforce uses in various parts of the Monument.
Response: Identifying where illegal uses occur, and how to increase law enforcement to minimize those activities, will be ongoing. These monitoring and enforcement activities do not require a decision in the RMP.

1(426)
Comment: Page 3-51 Section 3.4 Tribal Interests, second bullet "Tohono O'Odham ranchers have interest in retaining occasional access to the IFNM from the Schuk Toak District to retrieve cattle that have strayed off the reservation (Steere 2005). The Pima NRCD is an Arizona State Agency. The Supervisors have all signed oaths of office requiring us to defend and uphold the US Constitution and the Constitution of the State of Arizona. The 14th Amendment to the US Constitution requires the States to defend the right of all U.S. citizens to "equal protection" of the laws.
We therefore must insist that if the BLM wishes to allow Tohono O'Odham tribal members to search for stray cattle on any IFNM grazing permittee's allotments, it must only occur under a written agreement signed by the Tohono O'Odham Nation, providing reciprocal permission for the IFNM ranchers to hunt for their stray cattle that wander onto the reservation. We recommend the BLM and Tohono O'Odham Nation enter into a Memorandum of Understanding that allows ranchers from either side of the fence to search for stray cattle, provided that representatives for the allotment being inadvertently trespassed are present and that an Arizona brand inspector approves all intentional cattle movements. We also highly recommend all gates between the IFNM and Tohono O'Odham reservation be replaced by cattle guards. Illegal immigration results in the gates and fences along this boundary being torn down and put up on a daily basis.
Furthermore, as you may be aware, the USDA may eventually also require documentation of the mixing of cattle herds. In any event, the individual permittees and the Nation should both be keeping accurate records of any stray cattle found mixing with their herds, as this information may at some point be necessary to trace cattle involved in an agricultural pandemic. We recommend this issue be addressed in the MOU we have proposed.
Response: Tohono O'odham tribal members may legally access the IFNM at any time, and BLM does not attempt to allow or disallow Tohono O'odham tribal members from accessing the IFNM to search for stray cattle. Whether or not the Tohono O'odham Nation allows access to its lands for this purpose is outside of BLM's jurisdiction. The development of an MOU to allow access when retrieving cattle on either the IFNM or Tohono O'odham tribal lands is also beyond the scope of the RMP. The addition of gates and cattle guards are implementation-level decisions and may be included in allotment management plans. Illegal immigration and damage caused is discussed in the cumulative impacts section of Chapter 4.

1(435)
Comment: This is our land not the federal governments.
Response: Land administered by the BLM is land held in trust by the Federal Government for the people of the United States. On behalf of the people, BLM is mandated by law to manage the public land, its resources and various values for multiple uses that sustain the land and its resources for the long-term needs of future generations.

1(444)
Comment: According to the Draft Report, Alternative C attempts to balance historical use with conservation of resources. We do not believe that these conflicting objectives can be balanced, and we do not believe that this balance complies with the Presidential Proclamation. Alternative C certainly does not comply with the spirit of the Proclamation.
Response: BLM does not feel that the general retention of historical uses and conservation of resources of the monument are mutually exclusive objectives, so long as these activities are properly managed. Some historical uses such as target shooting may not be compatible with the conservation of resources on the monument, and these activities have been restricted as necessary in the proposed alternative. Other historical uses such as motorized travel and camping have been limited - but not prohibited - in order to protect the monument's resources.
The monument land will remain available for public use subject to the use restrictions needed to protect monument objects and minimize conflicts with other allowable uses. Refer also to the comment summary and response 1(SR434) for additional information on the guidance provided by the Proclamation and BLM's associated management responsibility.

1(445)
Comment: On page 2-5, (section 2.3.3) is the information that the BLM Land Use Planning Handbook H 1601-1 (2005) is the source of policies applicable to this RMP development. Examination of this document (page 32-33, section V. Monitoring, Evaluation and Adaptive Management) reveals that land use plans are required to establish intervals and standards for evaluations and assess effectiveness of the plan in the context of stated goals and objectives. Unless it is possible to stipulate that IFNM resources are insensitive to the potential problems and conditions identified within this draft document, these critical facets of land use plans must be included.
Response: A monitoring framework that establishes intervals and standards for evaluations will be included in the Approved RMP. BLM has added additional information in Section 2.3.5 about adaptive management, monitoring, and evaluation of monument resources, and will initiate a public process after the release of the Approved RMP to guide monitoring and evaluation in the IFNM.

1(446)
Comment: Item 1.1: The idea that a stand-alone RMP for all NLCS units is not feasible because of the vast differences nationwide amongst these units. Historically other attempts to manage using one-size-fits-all procedures have not worked.
Response: The text of the Draft RMP/EIS has been interpreted to mean the BLM would develop one plan for various NLCS units, which is not the case. To clarify, BLM has revised the wording to read, "to implement BLM's policy to prepare an RMP for each National Landscape Conservation System (NLCS) unit, including the IFNM."

1(447)
Comment: under the concept of "multiple use" of our public lands, all citizens should be allowed to pursue their legitimate outdoor interests without undue interference.
Response: While it is understood that every user of public land would like to exercise his or her particular use with little restriction or interference from others, BLM must identify uses that are compatible with the

Proclamation's mandate to protect and manage the objects of the monument (identified in Table 1-2), and manage those uses so that the purposes of the IFNM are achieved.

1(450)
Comment: Chapter One: Introduction 1.3.3 Vision SBM wishes to reiterate some of the comments made earlier in the planning process regarding the Vision. Specifically, the inclusion of open spaces and outstanding vistas is inappropriate. Nowhere in the proclamation establishing the IFNM is there a reference to any scenic or visual attributes of the IFNM. Instead, the entire focus is on the ecologic importance of ironwood ecosystem and archaeological/cultural value of the sites.
Response: The Proclamation does address the scenic and visual attributes of the IFNM when it states that "the monument presents a quintessential view of the Sonoran Desert with ancient legume and cactus forests." In addition, BLM's primary guidance for management of public land comes from the FLPMA, which requires that "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... and that will provide for outdoor recreation and human occupancy and use..."The Proclamation and FLPMA have guided BLM's development of proposed management for the IFNM to protect monument objects and accommodate multiple uses.

1(451)
Comment: Overarching Goals: The term sustainable multiple-use should not preclude uses of land within the monument for mining, where valid existing rights exist. In the previous draft of the overarching goals, businesses were included in the list of entities that would benefit socially and economically from pursued partnerships. Businesses should be restored to this list.
Response: The term "sustainable multiple uses" does not state or imply that mining under valid existing rights would be restricted within the IFNM. Section 1.3.4 in the Proposed RMP/FEIS the overarching goals, businesses have been added to the list of those who could benefit from partnerships.

1(458)
Comment: Impacts of visitor use and grazing should be closely monitored and guidelines or triggers for action to protect the monument should be developed.
Response: Under all alternatives, livestock grazing practices would be adjusted in accordance with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration Refer also to the Alternatives comment summary and response 2(149). Visitor use will also be monitored and management actions can occur to address emerging trends. See Section 2.3.5 for additional information on monitoring that has been included in the Proposed RMP.

1(473)
Comment: I would like to see you protect the whole area of the monument from destruction of its unique qualities. We hunger for wild places. If you let it be destroyed, it will be forever.
Response: All the alternatives would provide resource protection and uses within the IFNM, consistent with the Proclamation and FLPMA.

1(479)
Comment: Arizona Desert Wilderness Act Page B-1 states that this act is related to the development of the DRMP. However, this act only applies to specific named areas, of which IFNM is not included, and therefore this act is irrelevant to IFNM.
Response: The Arizona Desert Wilderness Act has been removed from the list in Appendix B.

1(SR61)
Summary Comment: Recreational shooters are not to blame for the trash at the IFNM. Instead of imposing regulations on them, the BLM should create and enforce strict littering laws.

Summary Response: BLM enforces regulations regarding litter on public lands and coordinates with volunteer groups to remove litter from the monument and other public lands. BLM works with law enforcement personnel in the enforcement of regulations associated with public lands and looks forward to cooperation with the public to assist in litter control and pickup. Also see summary comment and response 18(SR8) for additional information regarding management of the monument.

1(SR149)
Summary Comment: The final resource management plan should include plans for careful monitoring. Guidelines or triggers for action to protect IFNM objects should be developed. These "limits of acceptable change" should be developed and should focus on vulnerable parameters such as sensitive and/or indicator species, numbers and impacts of people, grazing, unauthorized routes, and any other issues that might result in harm to IFNM objects.
Summary Response: In general, monitoring by resource or use has been included in the Draft RMP/EIS in Appendix D, and monitoring has been specifically identified for management decisions related to special status species, land restoration activities, recreation, travel management, and other resources and uses. Specific protocols for monitoring monument objects and other resources will be developed by BLM with input from partnering agencies, organizations, and the public. Several public comments on the Draft RMP have made specific suggestions for developing monitoring protocols, and these will also be considered. BLM has added additional information in Section 2.3.5 about monitoring and evaluation of monument resources and related adaptive management approaches. Monitoring is considered an administrative action (day-to-day activity conducted by BLM that does not require a NEPA analysis); as such, it is not specifically analyzed in the RMP.

1(SR223)
Summary Comment: The Draft RMP/EIS does not include a definition of the word "enhance." This could leave the interpretation of the word "enhance," necessary management actions, and measurement of enhancement up to the courts. Also because conservation incorporates reversal and elimination of threats, the terms "enhance" and "restore" are not necessary in the Draft RMP/EIS.
Summary Response: Throughout the document, the words "enhance" or "enhanced" are used in various places to indicate a desire to improve the productivity, value, or quality of resources or resource uses within the IFNM while meeting the intent of the Proclamation, which is to protect objects within the IFNM. The word "enhance" has been added to the glossary in the Proposed RMP/Final EIS. Although some benchmark or baseline data are available, monitoring and adaptive management will be conducted as part of implementation planning that will occur on a site-specific basis to ensure conditions of monument objects and resources are maintained and/or improved as part of the overall monument conservation and management strategy.

1(SR419)
Summary Comment: A summary document should be released in the future, as a way to provide a greater level of public accessibility and involvement.
Summary Response: BLM included a summary at the beginning of the Draft RMP/EIS to allow for a brief yet thorough description of the document. The Draft RMP/EIS, including the summary, was made available for public review in hard-copy format, CD-ROM, and on the BLM's website. This Proposed RMP/Final EIS also has been made available similarly.

1(SR425)
Summary Comment: There is not an evident protocol for calculating human carrying capacity and responding in ways that manage that activity so that it conserves into the future natural system values necessary to support future life with quality.
Summary Response: BLM agrees that there is not one evident protocol for determining human carrying capacity. BLM will use adaptive management strategies to adjust management as conditions and demands

on resources change within the IFNM; these strategies will help BLM manage in ways to conserve the objects of the IFNM, consistent with the values of the public as expressed in the vision for the monument.

1(SR434)
Summary Comment: Based on the biological, geological, and archaeological values identified in the Proclamation establishing IFNM, BLM should recognize that "multiple use" is secondary to resource protection and certain uses (for example, recreational shooting) are not appropriate within the IFNM.
Summary Response: BLM manages national monuments subject to the provisions of each individual proclamation and the guiding principles of FLPMA. FLPMA requires that "management be on the basis of multiple use and sustained yield … except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." FLPMA also requires that "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... and that will provide for outdoor recreation and human occupancy and use ..." BLM's management of the IFNM is also guided by Presidential Proclamation 7320, "pursuant to applicable legal authorities, to implement the purposes of this proclamation." The Proclamation and FLPMA have guided BLM's development of proposed management for the IFNM to protect monument objects and allow for multiple uses. Absent a conflict, the Proclamation does not supersede or preempt other applicable statutory guidance (e.g., FLPMA). In fact, the Proclamation states that "establishment of this monument is subject to valid existing rights" and specifically allows for the continuation of various uses such as grazing, among other things.
All alternatives and decisions proposed for the monument are designed to protect monument resources and the objects described in the Proclamation and as described in Section 1.3.1. Protection of these resources and objects does not preclude a certain amount of public use and recreational enjoyment. Though the Proclamation emphasizes the protection of these resources and objects, FLPMA allows for multiple uses as long as the protection of monument resources and objects is ensured, and this conclusion is reached in the impact assessments in Chapter 4. We believe the proposed alternative provides for the protection of monument resources and objects, while allowing compatible uses and enjoyment of the monument by the public.

1(SR453)
Summary Comment: The Federal government should enact any laws to ban recreational shooting on IFNM at a congressional level.
Summary Response: It is the responsibility of the BLM to identify and implement management appropriate and compatible with all uses of the monument subject to the provisions of the Proclamation and the guiding principles of FLPMA. While target shooting has been identified as a legitimate use of public lands in general, it is an activity that can be restricted based on the management goals and objectives for specific BLM lands.

1(SR477)
Summary Comment: The Mining and Minerals Policy Act of 1970 and the National Materials and Minerals Policy, Research and Development Act of 1980 have been omitted from the list of legislative requirements. The valid existing mineral rights in the IFNM should be managed consistently with the policy of promoting an orderly and economic development of domestic mineral resources.
Summary Response: The legislative requirements described in Section 1.4 are the primary requirements that influence BLM's development of an RMP; the information presented is not an exhaustive list of the laws, regulations, and policies applicable to public land administered by BLM. The language of the introduction of this section has been modified to read "These and other laws, regulations, and policies provide the framework for management of the IFNM." In accordance with the Proclamation, management of the IFNM will be subject to valid existing rights, which include valid existing mining claims.

1(SR498)
Summary Comment: BLM must identify the border situation as one of the cumulative effects concerning the management of monument objects and consider all legal uses in addition to the ongoing illegal ones.
Summary Response: The cumulative effects analysis included consideration of U.S. Border Patrol activities and illegal undocumented immigrant and drug smuggler entry to the United States (refer to Table 4-19 and Section 4.7.2).

1(SR916)
Summary Comment: The loss of operating cattle ranches poses the threat of habitat fragmentation due to the potential for State and private lands to be sold and converted into harmful incompatible uses.
Summary Response: The analyses of impacts from Alternative B have been revised to include the potentially diminished value of State and private lands for livestock grazing if public lands administered by BLM were not available for those purposes.

Category 2: Alternatives

2(145)
Comment: To properly enforce any rules including the Plan above the BLM would have to hire a small army of people, then supply adequate training, wages, uniform, vehicles, retirement programs, offices, and a larger management team. This would be for starters and [the] financial tax burden would be prohibitive. A plan of action to patrol sport shooting that may be financially acceptable would be to utilize one or two helicopters for patrols and enforcement.
Response: Though staffing, enforcement and cost are all considerations in developing a land use plan, the RMP does not make decisions on these topics. These are administrative actions that are a part of on-going agency management that operates outside the planning effort. The BLM's management would not preclude use of helicopters and helicopters are regularly used by BLM, in partnership with the Arizona National Guard, to patrol the IFNM for illegal smuggling activities. These patrols often result in indirect patrolling of other activities as well, such as recreational shooting. However, helicopter patrols are ineffective without concurrent coordination with a patrol unit on the ground. The BLM Tucson Field Office considers the best value when implementing the annual budget for law enforcement, and under the Federal Acquisition Regulations (Part 15), BLM could acquire additional helicopter services if they are determined to be necessary and cost effective.

2(407)
Comment: We do not agree that the Proclamation indicates that grazing leases should be allowed to continue on the IFNM. DRMP/DEIS at 2-2. The Proclamation language states that "Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the monument." See Proclamation. This only means that were permits to continue, the BLM would have to authorize them according to BLM policy, directives, and federal law. There is nothing preventing immediate administrative action to end grazing immediately in the case of harm to Monument objects.
Response: BLM has revised the text from Section 2.2.2 of the Draft RMP/EIS to explain that the immediate elimination of grazing from the IFNM was considered during the development of alternatives; however, it was felt to be unreasonable in terms of costs to BLM and IFNM lessees, manageability, enforcement, and various other issues. BLM opted to consider a more feasible approach to the elimination of livestock grazing on the IFNM through the removal of livestock grazing as existing leases expire (as part of Alternative B). The impact assessment (Chapter 4) addresses the potential for impacts to objects of the monument. The assessment concluded that implementation of the management actions associated with each alternative would generally result in impacts that would be undetectable or measurable only in localized areas and that the nature of the impacts would be consistent with "protection of the monument objects" as defined in Section 1.3.1. In addition, BLM evaluates grazing leases in accordance with BLM's

standards for rangeland health and guidelines for livestock grazing management; adaptive management principal would be implemented if these evaluations determined that monument objects were not being adequately protected.

2(700)
Comment: Instead of banning recreational shooting we could charge on weekends to enter areas, to help with wages of forest rangers, and to help clean what has been destroyed by ruthless individuals that have no regard for what we all have.(I wouldn't mind paying to see and use my deserts and forests)
Response: The reasons for proposing closure of IFNM lands to recreational shooting are primarily based on damage to resources, property damage and safety factors, not based on operational costs and availability funds. BLM has the authority under FLPMA to establish individual permit requirements for recreational use of special management areas, which could generate fee collections under the Federal Lands Recreation Enhancement Act (FLREA) for use in managing the area. At this time, establishing the IFNM as a fee area is not being proposed, but it can be considered in the future for recreational use of Monument lands.

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2(701)
Comment: I strongly support Alternative D (greater access) as the one that most closely meets the BLM's mission of providing enjoyment of the land for present and future generations [because] continuing to designate huge areas as off limits to motorized vehicles puts the BLM in the position of denying access to all but the most able-bodied who can pack in on foot or horseback.
Response: Aside from providing recreational opportunities when drafting land use planning documents, BLM has several mandates to consider including the Proclamation and FLMPA. Alternative C, BLM's proposed alternative, retains reasonable motorized access to the vast majority of the monument for touring, exploring, and sightseeing. Under the proposed plan, only 9 percent of the planning area would be completely closed to motorized vehicle use by way of area closures.

2(704)
Comment: Limit shooting to clubs and to shooters who carry an Arizona Concealed Carry permit (CCW). This would also tend to weed out the irresponsible shooters who damage the area and leave trash.
Response: BLM has chosen to consider a range of alternatives that includes either a continuation of existing management (Alternative A), prohibition on recreational target shooting (Alternatives B and C), or recreational target shooting only in designated areas (Alternative D). BLM did not analyze an alternative that permits recreational shooting only by certain members of the public. Such a management scenario would be unfair to many users and be extremely difficult and costly to manage.

2(705)
Comment: Limit recreational shooting to club-organized events, held in a specific location on specific days, with the understanding that the area would be cleaned up. Then go and check the area after the club

leaves, to make sure any trash or litter does not belong to the club participants. Do not hold the clubs responsible for damage and litter by other individuals.
Response: Organized recreational use such as club events can be permitted under existing regulations at 43 CFR 2930. However, if BLM were to receive an application for a recreational shooting event in the IFNM, BLM would likely work with the applicant to use public lands outside the monument better suited for such an event. Refer also to summary comment and response 18(SR21) for additional information regarding recreation shooting within the monument.

2(710)
Comment: I have seen very little from BLM way of management initiatives or presence in the 6-7 years since the establishment proclamation to bring Ironwood up to what the public expects for a National Monument other than a boundary sign or two. If we see no forward motion with this RMP, we need to consider turning land management responsibility over to the Park Service as a 3rd unit of SNP. The range of alternatives was not broad enough because it omitted this option.
Response: BLM does not have the authority to transfer responsibilities for the administration of the IFNM to the National Park Service. Such an option is outside the scope of the RMP.

2(711)
Comment: More time should be spent on education for recreational shooters, community efforts by recreational shooters to clean and maintain areas abused by others, enforcement of illegal activity, and maybe even the development of designated shooting areas.
Response: BLM has conducted education and cleanup efforts and will continue to do so, as described in Appendix D. Refer also to summary comment and response 18(SR21) for additional information regarding recreational shooting within the monument. In addition, BLM policy as established in Washington Office Instruction Memorandum 2008-074, Change 1 says the creation and management of shooting sites will only be considered on BLM land if those sites are disposed of to another entity for long term management. Disposal of land is not consistent with the proclamation, so such development would not be allowed on the monument.

2(712)
Comment: I have been informed that the BLM is planning to close the Ironwood Forest National Monument to recreational shooting. I presume this is in response to environmental concerns regarding the condition of the various "favorite" shooting areas. Surely a public awareness campaign could yield significant results.
Response: Numerous news stories, BLM-sponsored events, and contacts with the public since the designation of the monument have focused on the effects of shooting on monument objects. While some users have modified their shooting practices to the benefit of the monument's resources, overall impacts continue to worsen. Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM. That Proclamation effectively charged land managers with the proper care and management of those objects to be protected. Some recreational activities are compatible with the care and protection of those objects. However, BLM's proposed alternative prohibits recreational shooting because that dispersed activity has the potential to adversely impact the biological and cultural resources for which the IFNM was established. Please refer to Chapter 4 and Appendix I for more information on the effects of shooting in the IFNM.

2(713)
Comment: If litter is a large part of the reason for closing recreational shooting, why not arrange for clean-up parties? Isn't it worth trying?
Response: BLM has included enlisting volunteers and cleaning up litter in the administrative actions that could be conducted for management of the IFNM (refer to Appendix D, Recreation). These actions do have an effect on monument objects. However, education and clean-up projects alone are not a

sustainable long-term solution to mitigate the impacts of recreational target shooting on the IFNM. Furthermore, Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM. That Proclamation effectively charged land managers with the proper care and management of those objects to be protected. Some recreational activities are compatible with the care and protection of those objects. However, BLM's proposed alternative prohibits recreational shooting because that dispersed activity has the potential to adversely impact the biological and cultural resources for which the IFNM was established. Please refer to Chapter 4 and Appendix I for more information on the effects of shooting in the IFNM.

2(714)
Comment: BLM Reversal of Preliminary Draft Alternatives: The Proposed Alternative's ban on recreational shooting is inconsistent with the Preliminary Draft Alternatives published by BLM in August 2005. Specifically, three of the four alternatives in the Preliminary Draft included provisions for recreational shooting, including Alternative C, which is now the Proposed Alternative. BLM's schedule of events for the RMP/EIS process indicates no additional draft alternatives were released between August 2005 and the release of the Draft RMP/EIS in March 2007. Yet, while it is clear that BLM reversed its thinking on the issue of recreational shooting during this time, during the public meetings, no member of the BLM management team could explain the basis for the reversal.
Response: The preliminary draft alternatives were released to allow the public to be involved in alternative development by commenting on the alternatives before they were finalized. In the 1.5 years between release of the preliminary draft alternatives and the Draft RMP/EIS, a number of management actions were modified based on comments received, additional analysis of preliminary actions, and evaluation of the impacts of the alternatives. BLM's proposed alternative prohibits recreational shooting because that dispersed activity has the potential to adversely impact the biological and cultural resources for which the IFNM was established. BLM did consider identifying specific sites for recreational target shooting under Alternative D and the effects of establishing designated shooting areas at Avra Hill and Cerrito Represo are evaluated in Chapter 4. The analysis of the selection of specific sites for recreational shooting is included in the plan as Appendix I.

2(715)
Comment: WE OBJECT to the Proposed regulation on Page 2-10, Alternatives B, C, D, Row 3. "In areas of sensitive or fragile soils, prohibit new ground disturbing activities. Mitigate existing ground-disturbing activities." This would prohibit developing any new water sources, maintaining any roads, installing new cattle guards, installing new fencing, etc. In fact, it prohibits cars from driving down roads and creates a de-facto wilderness area out of the IFNM without legally required Congressional action.
Response: The proposed alternative would not prohibit new or existing ground-disturbing activities in areas of sensitive or fragile soils. Rather, it provides for management of ground disturbing activities to prevent fugitive dust through appropriate measures depending on the activity. Map 3-2 shows the areas that contain sensitive and fragile soils, and Table 3-3 has been included in the PRMP to disclose the number of acres of sensitive and fragile soils in the IFNM. This management action would not serve as a designation of wilderness. Motorized travel would be permitted throughout the majority of the monument as indicated on Map 2-21.

2(718)
Comment: We are concerned with the construction of wildlife waters within the Ironwood Forest National Monument. There may be some limited benefit of these wildlife waters to support migrating wildlife populations in response to global warming and climate change in the Sonoran Desert, but any decisions regarding construction and placement of such waters should be based on the best available science and not on multiple use requests. See Lynn et al 2006, Marshal et al 2006, O'Brien et al 2006. They should be analyzed relative to their overall impact to the system and the multitude of wildlife and not just a single species. For example, Arizona State University biologist David E. Brown has observed that helicopter

surveys of dry ranges south of the border have indicated a higher density of bighorn sheep than similar areas in the United States that have these water catchments. See "Artificial water holes awash in controversy" Arizona Daily Star, 01/18/04.
We note that during the earlier public process to collaborate on Ironwood Forest National Monument, the consensus group specifically agreed to an overarching assessment of the existing waters within the Monument and a comprehensive analysis of the need for future water developments. This was to provide a framework for the development of wildlife waters, and the agreed upon management is not contained in any of the alternatives. The informal agreement about this has already been breached.
Response: BLM intends to fully honor the informal agreement to complete an assessment of the existing waters and a comprehensive analysis of the need for future water developments within the IFNM, and this is provided for in the RMP. In Chapter 2, Table 2-5 Resource Management Alternatives for Wildlife and Wildlife Habitat, Decision 6 directs BLM to evaluate additions, modifications, and potential removal of wildlife waters. Any proposals for new waters would be evaluated in context of existing waters and the overall need for such waters within the IFNM. Wildlife safety and well-being is an inherent part of this evaluation. As required by the Proclamation, the management actions and strategies defined in the RMP were developed so that "proper care and management of the objects" is ensured. When new information is obtained through monitoring and research studies, and as conditions change in the IFNM, management actions and approaches may be adapted. BLM will continue to seek partnerships with universities, State and Federal agencies, ranchers, and science-based organizations in designing and implementing inventory and monitoring the IFNM so that protection of resources within the IFNM is ensured.

2(719)
Comment: In general, there is very little if any variation between resource management alternatives B, C and D on various aspects. The following aspects provide identical conditions for alternatives B, C and D:
• Air Quality
• Geology and Caves (with the exception of permitting collection of geologic resources
• Soil and Water Resources (with the exception of disturbing fragile soils)
• Wildlife and Wildlife Habitat (with the exception of prohibiting dogs)
• Fire Ecology and Management
• Paleontological Resources
• Energy and Mineral Resources
• Special Designations
There should be varying management conditions in all of these aspects to clearly present real alternatives. If there are no management alternatives, these aspects should not be presented in this format.
Response: The alternatives are presented in the table format to allow for quick comparison between the various alternatives. Where there is little variability between alternatives, it is often due to the management requirements or constraints of the Proclamation. For example, BLM is given virtually no latitude in management of energy and mineral resources, as the Proclamation prohibits new mining claims, mineral leases, or sales. BLM did not develop alternatives that would be illegal to implement or that fall outside the purpose and need of the RMP. Furthermore, each alternative should be considered as a whole when comparing the overall range of alternatives. While it may appear that wildlife habitat is treated the same in every alternative based on management action in that table, the route system, which varies extensively by alternative, will have a significant impact on wildlife habitat. Chapter 4 discloses the impacts of each action on other resources and resource uses, which vary widely by alternative. A quick view of these impacts and the variation between them is available in Table 2-18, Summary Comparison of Impacts.

2(721)
Comment: Resource Management Alternatives for Livestock Grazing
Objective 11 of Appendix E states: "Provide for herd management for wild horses and burros, which is consistent with the category goals, objectives, and management actions of the Rangewide Plan. This may include limiting or precluding wild horse and/or burro use, as appropriate."
While this excerpt is taken out of the order of the document, it must be commented upon within the context of grazing rights. There are currently no known herds of wild burros or horses within the IFNM. It would seem that if Alternative B is implemented and grazing allotments are withdrawn, then any plans to relocate or populate the monument with herds of wild burros or horses would also be precluded by the same preservation efforts.
Response: BLM does not intend to populate the monument with wild horses or burros; the text is included as a general guideline for such animals should they appear in the future. The objective is included as a conservation measure for special status species and also states that "This may include limiting or precluding wild horse and/or burro use, as appropriate." Refer also to summary comment and response 9(354) for additional information regarding wild horses and burros.

2(723)
Comment: Additionally, when describing the alternatives, the BLM has erred in its characterization of Alternative B. This alternative is repeatedly called the "most restrictive" alternative in the Draft RMP/EIS; in the preliminary draft alternatives, it was characterized as "minimizing human use." Neither of these provides an objective and unbiased viewpoint to the reader, since both convey "human use" as the purpose and signifier of the planning alternatives. In the context of the Monument designation, the conservation values of the alternatives should be emphasized. While some human uses may actually increase in response to increased natural values, this is not to be the foremost goal of Monument management.
Response: The alternative summaries are included to give readers a general understanding of the range of decisions considered by BLM for management of the IFNM. The summaries compare and contrast the alternatives based on the uses allowed, primarily because the variations in uses would result in different impacts on resource values. Language included in that section is not meant to imply that accommodating human use is the dominant goal of the management decisions.

2(724)
Comment: Page 2-19 "Remove fences, roads, and facilities that are no longer necessary for transportation, wildlife management, monument administration, or other purposes in their present location." this conflicts with Page 2-50 under Resource Management Alternatives for Livestock Grazing, Decisions for Management Actions, Allowable uses, and Use Allocations Item 3: "… Even if BLM initially decides to discontinue livestock use on some or all of an allotment, it may later decide to resume livestock use if it determines, based on its subsequent evaluation... that it is appropriate to do so."
Response: The text of the wildlife and wildlife habitat decision states "remove fences …that are no longer necessary for transportation, wildlife management, monument administration, or other purposes…" The other purposes mentioned could include livestock operations. However, if fencing is used to implement other management decisions, including the removal of livestock grazing under Alternative B, fences would not be removed.

2(SR8)
Summary Comment: There are sufficient laws and regulations regarding use of public land (e.g., recreational shooting, OHV use) that make it a crime to harm the land; the RMP should not introduce new law and regulation. People who break the law will continue to break the law. Rather than restricting use of the land, existing laws should be enforced. For example, misuse of firearms, fire hazards, littering, etc. require enforcement and heavy penalties.

Summary Response: Approval and implementation of the RMP will not result in passage of new laws or regulations. The purpose of the RMP is to establish a framework for managing the land, resources, and uses within the monument as established in the Proclamation and in accordance with FLPMA. Under this framework, BLM manages the land and enforces current laws, regulations, and policies. The decisions within the RMP define what types of activities or uses are allowed or prohibited within all or part of the monument. Enforcement activities are a component of BLM's management but cannot be used as a substitute for proactive land management, just as management decisions are not made as a substitute for law enforcement activities. Also note that legal uses of public lands can inadvertently cause resource damage, depending on the intensity of the use and other factors, which is one of the primary reasons why BLM develops allowable use restrictions and other management prescriptions.
Law enforcement within the monument requires and includes coordination with other agencies, and is heavily influenced by current staffing and funding. Employing additional law enforcement personnel is a question of funding appropriated by the U.S. Congress, and congressional funding legislation is beyond the scope of this RMP/EIS. Rather than making assumptions regarding future levels of congressional funding, the RMP/EIS attempts to address resource needs and identify actions to protect those resources, which can have the effect of making existing law enforcement resources more efficient by simplifying regulations. This strategy is intended to help protect natural and cultural resources and enables BLM rangers to devote more of their time to dealing with illegal dumping and other law enforcement issues.

2(SR26)
Summary Comment: Recreational shooting disrupts other recreational activities, such as solitary contemplation, nature viewing, bicycling, horseback riding, hiking, and birding. While some shooters are responsible, others are not, and both damage the monument.
Summary Response: The BLM has considered and analyzed continuing to allow recreational target shooting (under Alternative A) prohibiting recreational target shooting (Alternatives B and C), and allowing recreational target shooting in designated areas within IFNM (Alternative D). Effects of each alternative are addressed in Chapter 4.

2(SR52)
Summary Comment: Phasing out or relinquishing and/or buying out livestock grazing permits or leases in the IFNM will greatly enhance the area's natural vegetation and help erosion control. It is well known the detrimental impacts that livestock grazing has on desert landscapes and cultural resources, as it severely impacts plant community composition and destroys cryptobiotic soil communities, artifacts, and prehistoric features. Managing these lands as they have been is incompatible with their designation as the IFNM.
Summary Response: The Arizona Standards for Rangeland Health and Guidelines for Grazing Administration are common to all alternatives, and apply to all resources and resource uses. The guidelines state that livestock management practices to achieve desired plant communities will 1) maintain or promote ground cover that will provide for infiltration, permeability, soil moisture storage, and soil stability appropriate for the ecological sites within management units; 2) provide for growth and reproduction of those plant species needed to reach desired plant community objectives; and 3) consider protection and conservation of known cultural resources, including historical sites, and prehistoric sites and plants of significance to Native American peoples. Phasing out livestock grazing permits and leases is considered under Alternative B, and the possible affects of this decision are considered in the Draft RMP/EIS. The potential for the voluntary relinquishment of livestock grazing permits in the IFNM is considered and analyzed under Alternatives C and D. Current Federal regulations prevent agency buyouts of grazing permits and leases. Refer also to summary comments and responses 16(52) and 16(56) for additional information regarding livestock grazing within the monument.

2(SR62)
Summary Comment: Illegal immigration, drug running, and law enforcement activities cause damage and destruction to IFNM resources. BLM should address the topic of illegal immigration and enforcement activities.
Summary Response: BLM is required to analyze the impacts of BLM's management decisions on the IFNM. No management decisions are made in the RMP related to illegal activities (including immigration) and associated law enforcement activities. Apprehension of undocumented immigrants is the responsibility of the U.S. Border Patrol. However, BLM has analyzed the potential for impacts from those activities within the cumulative impacts section of the Draft RMP/EIS in Section 4.7.2. Additional information regarding these impacts has been included in the Proposed RMP/FEIS in Section 4.7.2. BLM continues to work with appropriate authorities to deal with illegal smuggling activities on the IFNM and the resource impacts that directly and indirectly result from these activities.

2(SR65)
Summary Comment: The BLM should use volunteer groups to clean up sites rather than banning recreational shooting altogether.
Summary Response: Under FLPMA, Section 301, a-e, BLM may accept volunteer help to aid in research, management, and protection (excluding law enforcement). BLM uses volunteers on a regular basis in the IFNM, primarily for assistance in clearing the monument of refuse. BLM will continue to use volunteers and groups to facilitate research, data collection, and litter cleanup within the IFNM. As valuable as these volunteers are to the ongoing maintenance and management of the IFNM, the work they do should not be considered a substitute for management actions that are needed to meet the goals and objectives for the area. Rather, volunteers help BLM fulfill its management responsibilities to meet those goals and objectives.

2(SR85)
Summary Comment: BLM should designate a special controlled location on the IFNM specifically for recreational shooting. It could be identified on maps and signed so people would know where to go for shooting or how to avoid it for public safety, and signage could be used to describe the penalties for littering, damaging resources, and using the range improperly.
Summary Response: BLM completed an analysis to identify specific sites for recreational target shooting; the results of this analysis are summarized in Appendix I. Two sites were identified for further analysis and were assessed for environmental impacts in Chapter 4 as a component of Alternative D. The analysis identified the potential for significant environmental effects, including impacts to monument objects that could not be mitigated. Also note that BLM policy as established in Washington Office Instruction Memorandum 2008-074, Change 1 says the creation and management of shooting sites will only be considered on BLM land if those sites are disposed of to another entity for long term management. Disposal of land is not consistent with the proclamation, so such development would not be allowed on the monument.

2(SR87)
Summary Comment: Don't restrict people from their public land. We need everyone out there to be extra eyes for the BLM and to help remove trash, report illegal activities, and help others in need on the IFNM.
Summary Response: BLM greatly appreciates the efforts made by many visitors and volunteers who remove trash, report illegal activities, and help others in need, not as a part of any organized volunteer activity, but as a regular part of their public land visits. BLM also regularly coordinates with volunteer groups to help meet management objectives for the IFNM, and none of the alternatives would preclude BLM from continuing to work with these groups or discourage anyone from continuing this good citizenship. Volunteers who wish to assist the agency in implementing the RMP would continue to be accommodated. However, this partnership would not be considered a substitute for proactive management

or enforcement of any provision of the RMP. Refer also to summary comment and response 2(65) for additional information regarding volunteer aid in research within the monument.

2(SR88)
Summary Comment: Choose management alternatives that provide the remaining IFNM resources the best protection from housing development, roads, and OHV use. None of the current alternatives provide enough protection. The IFNM should be given the same level of protection as the national parks.
Summary Response: BLM developed the four alternatives presented in the Draft RMP/EIS to demonstrate a range of allowable uses within the IFNM, consistent with the Proclamation and BLM's multiple use mandate. In the proposed alternative, BLM would restrict or prohibit certain uses or activities that have the potential to adversely impact the biological and cultural resources for which the IFNM was established. While they offer varying means of achieving our objectives, each alternative complies with the Proclamation.

2(SR434)
Summary Comment: Based on the biological, geological, and archaeological values identified in the Proclamation establishing IFNM, BLM should recognize that "multiple use" is secondary to resource protection and certain uses (for example, recreational shooting) are not appropriate within the IFNM.
Summary Response: BLM manages national monuments subject to the provisions of each individual proclamation and the guiding principles of FLPMA. FLPMA requires that "management be on the basis of multiple use and sustained yield … except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." FLPMA also requires that "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... and that will provide for outdoor recreation and human occupancy and use ..." BLM's management of the IFNM is also guided by Presidential Proclamation 7320, "pursuant to applicable legal authorities, to implement the purposes of this proclamation." The Proclamation and FLPMA have guided BLM's development of proposed management for the IFNM to protect monument objects and allow for multiple uses. Absent a conflict, the Proclamation does not supersede or preempt other applicable statutory guidance (e.g., FLPMA). In fact, the Proclamation states that "establishment of this monument is subject to valid existing rights" and specifically allows for the continuation of various uses such as grazing, among other things.
All alternatives and decisions proposed for the monument are designed to protect monument resources and the objects described in the Proclamation and as described in Section 1.3.1. Protection of these resources and objects does not preclude a certain amount of public use and recreational enjoyment. Though the Proclamation emphasizes the protection of these resources and objects, FLPMA allows for multiple uses as long as the protection of monument resources and objects is ensured, and this conclusion is reached in the impact assessments in Chapter 4. We believe the proposed alternative provides for the protection of monument resources and objects, while allowing compatible uses and enjoyment of the monument by the public.

2(SR497)
Summary Comment: Commenters request information regarding a drought plan for IFNM.
Summary Response: BLM and the State of Arizona developed an operational drought plan that was finalized in October 2004. The operational drought plan identifies a process for communication and coordination among Arizona State agencies, Federal agencies, tribal governments, State lawmakers, water users, resource managers, and scientists. BLM, as a member of the Interagency Coordinating Group, will provide policy guidance for plan implementation, agency emergency response options, and plan review and modification. The BLM is also a member of Arizona's Monitoring Technical Committee and will continue providing an essential role in tracking changes in climate and physical conditions and providing forecasts of likely future conditions. The Monitoring Technical Committee monitors and identifies

conditions throughout the state on an ongoing basis and detects and requests that the drought status be changed as data and conditions warrant.
BLM has the ability to modify management actions in this plan if changing environmental conditions, such as a major drought event, warrant such modifications. This can occur through adaptive management procedures or through more extensive efforts such as plan amendments and revisions. Numerous processes already in place, such as activities associated with BLM's standards and guidelines process, also address drought conditions.

2(SR702)
Summary Comment: BLM should develop an alternative that places no restrictions on recreational shooting and OHV use but instead cooperates with external groups that promote responsible recreational use and resource protection.
Summary Response: Alternative A, the No Action alternative addresses this management scenario. Chapter 3 describes the current situation that has resulted in management in this manner, and the impacts described in Chapter 4 describe the impacts currently being experienced and anticipated with its continuation. BLM coordinates with external conservation and sport organizations on a regular basis for volunteer projects, to promote responsible uses and other purposes, and none of the alternatives would preclude BLM from continuing to work with these groups. BLM will seek volunteers who wish to assist the agency in implementing the RMP. However, these partnerships would not be considered a substitute for proactive management or enforcement of any provision of the RMP. Refer also to summary comment and response 2(65) for additional information regarding volunteer aid in research within the monument.

2(SR703)
Summary Comment: BLM should adopt the route network proposed by Arizona conservation groups.
Summary Response: BLM considered the route designation proposal submitted, but did not analyze it in detail, as described in Section 2.2.3. BLM utilized the Route Evaluation Tree Process© to help achieve desired outcomes that were specifically tailored to the unique needs and issues of the IFNM. This process used several criteria to protect sensitive habitats and minimize excessive routes, including: 1) identifying and closing duplicative routes, 2) closing or limiting public use where there is a high risk of damage to sensitive resource values, and 3) retaining reasonable access, etc. Appendix G contains a comprehensive list of all the criteria used in the route designation process.

2(SR708)
Summary Comment: Visitors should be allowed to gather firewood that is already dead and down to aid in removal of excess wildfire fuels.
Summary Response: BLM had not included a provision for collection of dead and downed wood in the proposed alternative because it provides habitat for wildlife. The proposed alternative does provide for various types of hazardous fuels treatments where fuel loading is high.

2(SR709)
Summary Comment: BLM should place informational signs at the IFNM entrances to inform users that they must clean up after themselves and that fines would be imposed upon those who fail to comply.
Summary Response: BLM has the ability to place informational signage within the IFNM; this generally would be considered an administrative action and would not need to be considered as an alternative in the RMP. Several such signs are currently in place.

2(SR720)
Summary Comment: The Draft RMP/EIS does not provide a reasonable range of alternatives because only Alternative B gives primary consideration to conservation of monument resources.
Summary Response: While they offer varying means of achieving our objectives, each alternative complies with the Proclamation for protection of the monument objects. The action alternatives describe a

reasonable range of alternatives for management of the IFNM under applicable laws, regulations, and policies. BLM selected Alternative C as the proposed alternative because it provides protection of monument objects and public land resources, while maintaining opportunities for various traditional and recreational uses, to the extent such uses are compatible with the purposes of the IFNM.

2(SR722)
Summary Comment: There is a growing body of evidence that shows we are in an extended drought cycle. The RMP should give more consideration to climate change.
Summary Response: In order to disclose the environmental impacts of the four alternatives, some assumptions were made with respect to climatic fluctuation (see Section 4.3.4). We assumed, for example, that climatic fluctuation will continue to influence the health and productivity of plant communities. In order to deal with such uncertainties, the BLM intends to implement an adaptive management strategy for any alternative selected (see Section 2.3.5). The adaptive management approach would allow BLM the flexibility to protect the long-term productivity of the land, resources, and resource uses in the IFNM.

Category 3: Air Quality

3(459)
Comment: 2-7 AIR QUALITY Options fail to examine option of closing all (or all possible) roads to motorized traffic as a means of protecting and/or enhancing air quality. Points to analyze would include both fugitive dust emissions from roads and vehicle exhaust emissions including diesel vehicles, quads, and dirt bikes. And what about noise?
Response: Alternative B presents the minimum routes necessary for the management of the IFNM, including administrative access needs. Closing all routes to motorized traffic would not allow BLM to provide legal access or meet the management goals and objectives set for the IFNM (refer to revised Section 2.2.3 of the RMP/EIS). Air quality was specifically considered during the route designation process (refer to Appendix G of the RMP/EIS). As a result, BLM limited the miles of routes designated for motorized travel within nonattainment areas and areas with dust-prone soils. While BLM has not attempted to regulate noise in the planning area, BLM would enforce applicable State, county, and local noise regulations on the IFNM.

3(462)
Comment: To address air quality impacts in all of the alternatives considered, EPA recommends restricting OHV use in non-attainment areas and implementing mitigation measures to reduce the impacts of OHV use to air quality.
Response: Nonattainment areas were specifically considered during the route designation process, and motorized routes within these areas were limited based on air quality concerns. OHV use off designated routes is prohibited throughout the monument, except for emergency or authorized administrative purposes. Mitigation measures to reduce the impacts of motorized vehicle use on air quality are listed in Table 2-1.

3(463)
Comment: Draft Goals, Objectives and Alternatives - Air Quality
"Goal 1: Manage use to maintain Federal and State air quality standards."
SBM continues to object to the exclusion of valid existing rights in this goal. Drafting goals and objectives that do not recognize their existence is inappropriate.
Objective 3: Emphasize low polluting alternatives and fugitive dust mitigation measures within and near the monument, especially as they pertain to unpaved roads that traverse public lands and ground disturbing activities.

SBM continues to object to the term "near" as it implies that the management plan will have control over the activities outside of the public lands covered by this plan. The management activities of this plan should be limited to the 128,917 acres that BLM actually controls and even then must recognize that valid existing rights may be exercised in that area.
Response: The goals and objectives apply only to public land and give necessary consideration to valid existing rights, as do all the goals, objectives, and management decisions considered by BLM. It is not necessary to restate this for every goal, objective, and decision within the Draft RMP/EIS. With respect to the use of the word "near" in Objective 3, BLM would emphasize the use of low-polluting alternatives and fugitive dust mitigation measures on public land within and near the IFNM. Few sources of air pollution are exempt from Clean Air Act requirements, even those with valid, existing rights associated with mining claims, or those that affect areas at distances from the source. Downwind impacts are the nature of air pollution, and are regulated. However, BLM would not have authority to require any such measures off BLM-administered lands.

3(464)
Comment: 3.1.1.2 Visibility in Class I Areas
The Clean Air Act defines Class I areas as certain wilderness areas greater than 5000 acres...The planning area does not include any Class I areas.
Alternatives B and C include areas that will be managed for wilderness characteristics greater than 5000 acres. Even though the planning area doesn't contain any Class I areas, there is concern that air quality is one of the wilderness characteristics that will be managed. A Class I designation puts onerous conditions on air permit holders in the vicinity of the designated area. The full economic impact of this wilderness characteristic needs to be evaluated and addressed.
Response: BLM does not intend to manage lands with wilderness characteristics under provisions from the 1964 Wilderness Act. Section 201 of FLPMA directs the Secretary of the Interior to "maintain on a continuing basis an inventory of all public lands and their resource and other values," which provides BLM with the authority to inventory lands for wilderness characteristics. BLM's management of areas with wilderness characteristics does not include managing these areas with a Class I designation for air quality. Therefore, the analysis does not consider impacts that would result from a Class I designation.

3(465)
Comment: 4.3.1.3 Impacts on Air Quality
"Approximately 38,040 acres of the BLM surface lands would be closed to vehicular traffic...as compared with Alternative A, overall emissions within the IFNM likely would be reduced."
SBM believes this assessment is flawed in that it does not take into account increased travel from one part of the monument to another due to the closure of roads. SBM believes there could be a net emissions increase due to greater distances traveled.
Response: Over the life of the RMP, the overall emissions likely would be reduced because, in the closed areas, no new motorized routes could be authorized. BLM would designate routes for motorized travel between or adjacent to the closed areas to provide for continued access throughout the monument (refer to Map 2-21, Routes, Alternative C). A majority of the routes that would be designated for non-motorized travel would be routes that do not connect between two areas; that is, they are not "through routes" but instead "dead ends" within a certain area. As a result of the closed areas, it is likely that overall emissions would be reduced because fewer miles of routes would be available for motorized travel, but sufficient routes would be available to provide access throughout the IFNM. In addition, routes that become "through routes" and see increased travel and consequently increased fugitive dust emission can be mitigated through adaptive management by adjusting maintenance, vehicle speeds, surface stabilization, or other appropriate management actions intended to reduce fugitive dust production.

3(466)
Comment: We are concerned with items listed in the administrative actions as many go well beyond a simple administrative action and seek to impose additional regulatory burden on permittees, landowners and users in and near the monument. Additionally, the proclamation specifically does not reserve water rights, however several of the administrative actions seek to do just that.
A listing of those actions of concern to SBM include:
Air Quality
• Work with local businesses that have non-major permits within 6 miles (10 kilometers) of the Ironwood Forest Nation Monument (IFNM) to establish an understanding of the potential impacts their operations may have on the monument.
• Work with permitting authorities to ensure that the IFNM is treated as a pseudo "affected state" for the purposes of major source air quality permitting for facilities within 100 kilometers of the IFNM.
• Work with permitting authorities to ensure BLM has an opportunity to review non-major permits within 10 kilometers of the IFNM to determine their effects on air quality and monument resources.
• Keep informed of the compliance status of minor and major sources near the IFNM and inform the applicable permitting agency of potential violations if necessary.
Response: The administrative actions for air quality would not impose an additional regulatory burden; these actions would provide BLM with an opportunity to be informed of and potentially comment on activities in close proximity to the IFNM that could have an affect on air quality within the monument.

3(467)
Comment: Table 2-18 Summary Comparison of Impacts Table
Air Quality Alternative B - "A lack of utility corridors and allocating the IFNM as an exclusion area for right-of-ways would limit opportunities for surface-disturbing activities that could generate fugitive dust." There is flawed logic in this assessment in that it assumes additional utilities would not be constructed if no corridors are allowed. Instead, utilities would be constructed around the monument in a longer, less direct route thereby creating more fugitive dust from a greater amount of surface-disturbing activities.
Response: BLM has modified the text of Table 2-18 and Section 4.3.1.3 to indicate that the impacts on air quality (generation of fugitive dust) would be reduced within the IFNM as a result of not designating corridors or allowing rights-of-way, unless required by law. If corridors are not designated through the IFNM, there may or may not be additional utilities routed around the IFNM, depending on the need for the utility and potential alternatives (e.g., transmission lines versus development of additional generation facilities). This could result in an increase in fugitive dust emissions only if these utilities are developed. The potential for increased fugitive dust emissions has been added to Section 4.3.1.3.

3(472)
Comment: Page S-8 under Impacts on Air Quality:
"... surface disturbing activities, including ..., livestock grazing, ... would result in localized degradation of air quality. No scientific study is referenced. No relevant studies we are aware of have been performed. No conditions of precipitation or stocking levels are mentioned. No degree of this impact is estimated. The BLM appears to be guessing this is true, and we perceive the comment reflects more imaginative speculation than science.
Response: The Summary provides a synopsis of the Draft RMP/EIS. The existing condition (or affected environment) is described in Section 3.1.1 and cites the Arizona Department of Environmental Quality, Western Regional Climate Center, and other sources for baseline and regulatory data. A full discussion of impacts is included in Section 4.3.1. Without detailed information on emission sources it is not possible to quantitatively assess changes in air quality using dispersion models or similar tools, so a qualitative comparison of the proposed management decisions based on air quality conditions as discussed in Section 3.1.1 is offered. Using Environmental Protection Agency guidance, a quantitative analysis for PM10 emissions associated with estimated motorized travel on open motorized routes has been added to Section 4.3.1.

3(SR468)
Summary Comment: The increased risk of wildfire as a result of the buildup of fine fuels in the absence of grazing could impact air quality.
Summary Response: In the Draft RMP/EIS Chapter 2 Alternatives, see Table 2-7 Resource Management Alternatives for Fire Ecology and Management, decision 4 regarding management in areas where fuel loading is high, use biological, mechanical or chemical treatments to maintain levels of fuels. The risk of wildfire is the same for all alternatives.

Category 4: Geology and Cave Resources

4(99)
Comment: 2-8 GEOLOGY AND CAVES
First and primary goal should be to protect and preserve the geologic resources, and ensure there is no degradation of the resource under BLM's management, not to make sure they are available for public enjoyment.
What does identify appropriate management actions mean? Isn't that what this document is for, to outline and describe in detail those proposed actions?
Again, it's about providing access? There is nothing about prioritizing access to the resources identified in the proclamation.
Response: The management goal for geologic resources has been revised to emphasize protection of these resources' natural characteristics and processes. Because geologic resources within the IFNM are a primary scenic focus (scenery being a monument object), public enjoyment is an appropriate measure by which to ensure their preservation. The RMP/EIS provides management guidance for the known geologic resources by way of the Visual Resource Management (VRM) classes, recreation management zones (RMZs), areas managed to protect wilderness characteristics, route designations, and decisions for other resources and uses. However, BLM recognizes that additional information may be gathered that warrants management adjustments if and when additional, unique geologic features are identified. At that time, BLM will determine how they will be managed, in a manner consistent with the Proclamation and RMP, as well as for educational and interpretive objectives established for the visiting public.

4(132)
Comment: 3-7 3.1.2.1 The geology here is completely inadequate. BLM has failed to inventory the area or provide a clear understanding of the geological history and resources of the area. BLM failed to note the presence of numerous small stone arches in the Sawtooth Mountain Unit. If BLM doesn't know what's out there, if it has no baseline data, how can it manage and/or monitor the resources it is charged with protecting? How can it perform an adequate environmental analysis of something it doesn't really know much about? At the very least, management begins with that inventory. Hire a geologist with the US or AZ Geological Survey and do it right.
Response: The information provided in your comment about arches within the Sawtooth Mountains has been verified and included in the Proposed RMP. Per NEPA and CEQ, BLM need not provide an encyclopedic review of each resource found on IFNM within this Draft RMP/EIS. The Arizona Geological Survey (Richard et al. 2000) has prepared a geologic map of Arizona that includes the surficial geologic resources of the IFNM. See Scarborough (2003) for further detailed discussion of the geology of IFNM. BLM looks forward to working with USGS, Arizona Geological Survey, universities, and other interested groups to conduct needed research and data collection that could be used in the adaptive management of the IFNM.

Category 5: Soil Resources

5(101)
Comment: In Chapter 3 it is acknowledged that biological soil crusts are a significant ecological feature, but that they have not been "comprehensively inventoried, nor mapped, within the IFNM." Further, Appendix D indicates an action to "determine the current existence, location, and condition of desert pavement and biological soil crusts." This proposed activity is ecologically important as biological soil crusts function to improve soil stability and integrity as well as enhance soil-vegetation nutrient cycling (Harper and Belnap, 2001; Belnap et al., 2003); mapping the current distribution and condition could provide baseline information (Darby et al., 2007) about these important soil communities.
The USGS recommends, however, that the proposed mapping activity is expanded to include monitoring of these biological assemblages. The National Monument might provide ideal conserved conditions to study the trend dynamics of this type of bioindicator of change (Belnap et al., 1994), especially for natural and anthropogenic activities which could affect the ecology within the Monument. These activities include internal stressors, such as grazing (Bowker et al., 2006), fire (Bowker et al., 2004), or vehicular use (Belnap, 2002), or external, including wind (Belnap and Gillette, 1998; Belnap, 2003), air pollution (Belnap, 1991), climatic variability over time (Evans et al., 2003; Belnap et al., 2004; Belnap and Lange, 2005, Belnap, 2006), or invasive plant species (Belnap et al., 2006).
This information might not only help explain changing ecological conditions at the Monument, but contribute to understanding a larger issue of desertification (Belnap and Lange, 2005). Further information about biological soil crusts can be accessed from the USGS website for the Southwest Biological Science Center, http://sbsc.wr.usgs.gov/.
Response: BLM agrees with the USGS' recommendation that the proposed mapping activity be expanded to include monitoring of these biological assemblages. BLM looks forward to working with USGS and other organizations to conduct needed soil resources monitoring to aid in RMP implementation.

5(107)
Comment: [Page] 2-9 Soil and Water Resources
Construction, reconstruction, or maintenance of what facilities?
Response: Facilities include structures for recreation, livestock grazing, transportation and access points, and structures associated with roads and trails. Within the IFNM facilities include, but are not limited to, fences, stock tanks, pipelines, and catchment ponds. Language has been added to this management action to clarify its intent.

5(202)
Comment: The amount of surface disturbance due to recreational shooting is less per hour than motorized vehicle travel (even on existing dirt roads), less than mountain biking or horseback riding and in a few cases less than foot travel if the foot travel is in sensitive/sandy soil. With that said, the prohibition doesn't make sense logically and will likely have a completely unmeasurable benefit on surface disturbance in view of other uses. I strongly recommend that Alternatives B or C not be implemented.
Response: The disturbance of soil resources from all types of resource uses has been evaluated in the Draft RMP/EIS. While some uses cause more disturbance than others, surface disturbance from target-shooting activity can be significant due to the concentration of this use in many places throughout the monument, and management actions are analyzed to minimize or eliminate those impacts.

5(217)
Comment: Page 4-14 under impacts on Soil and Water Resources
In addition, areas where livestock or wildlife concentrate such as near water sources, would also compact soils in localized areas. These areas would experience the most soil compaction and loss or reduction of vegetation cover, as well as destruction of biological crusts and increased wind erosion.

The quoted statement contradicts itself. The author indicts cattle of both soil compaction and increased wind erosion within one sentence. Which is it? And why so consistently is no ecological benefit from cattle grazing mentioned in the DRMP? As usual, no scientific study is cited so we can assume the stated conclusion absent any data amounts to amateur guesswork.
Response: BLM used the information in the National Range and Pasture Handbook to determine potential effects of livestock grazing on soils. In addition, heavy hoof action causes trampling that results in soil compaction by decreasing the soil macropore space and reducing infiltration that can increase runoff and sediment yield (Bohn and Buckhouse 1985). Soil compaction inhibits root growth and subsequently plant growth (Bohn and Buckhouse 1985). This can result in areas where the loss of understory vegetation increases potential for wind erosion. Section 4.3.3 discusses how soil compaction, particularly in areas with sensitive or fragile soils, can result in erosion.

5(218)
Comment: A section of the EIS apparently authored by a geologist attempts to discuss the impacts of livestock reductions, without a single scientific citation supporting any of the claims made:[on] page 4-15. The author cited no scientific authority, so it appears he cited whatever positive results his untrained and inexperienced imagination came up with, and never considered any possible negative impacts of mandating new livestock restrictions, e.g., increased fire hazard, the need this creates to erect fences along land ownership boundaries, the consequences of installing fences without regard to impacts on grazing patterns, vegetation structure, carrying capacity, etc.
Response: We have interpreted this comment as referring to Alternative B because page 4-15 refers to Alternative A where there are no proposed changes to livestock grazing. As part of the interdisciplinary process for preparing the Draft RMP/EIS, the BLM Interdisciplinary Team reviewed all of the sections of the document and evaluated how a decision could affect soil and water resources.
The document has been revised to include localized impacts on soil and vegetation resources under Alternative B to indicate that, in areas where additional fencing could be required to implement livestock grazing decisions there could be localized, short-term surface disturbance. Refer also to summary comments and responses 5(217) and 10(468) for additional information regarding the source of information for determining impacts of grazing on soils and potential changes in fuel loading.

5(219)
Comment: Page 4-6-Alternative B (which terminates all grazing) states,
The retirement of grazing leases, and subsequently making allotments unavailable to grazing, would allow revegetation of areas presently denuded of grasses;
The BLM failed to recognize these soils are predominantly covered with vegetation, according to the NRCS inventories. The grazing allotments within the monument have been managed by the District Cooperators and the NRCS for years to improve soil cover and productivity there by reducing erosion by wind and water.
Response: The establishment of vegetation in arid areas depends on site-specific conditions, including historical uses such as livestock grazing and recreation. The Proposed RMP/EIS has been edited to clarify that in highly localized areas that have no or sparse understory vegetation, removal of livestock grazing and reducing the areas where overnight camping is allowed could result in revegetation particularly of grasses and annual plants.

5(220)
Comment: Page 4-7 (Alternative C)
Provision of additional stock waters for livestock would have the same impacts as those under Alternative A; it could increase dust in localized areas because stock-water areas generally become denuded of vegetation, creating conditions for the generation of wind-driven dust. We disagree.
Provision of additional waters would reduce the utilization of forage surrounding each water source and would allow greater and quicker recovery.

Response: BLM used the information in the National Range and Pasture Handbook to determine potential effects of livestock grazing on soils and vegetation. The Proposed RMP/EIS has been revised to clarify that the congregation of cattle in localized areas near water sources could result in the removal of understory vegetation, which could indirectly increase dust in localized areas. The Draft RMP/EIS also indicates in Section 4.4.2.2 that the decisions regarding the provision of additional stock waters in the Twin Tanks and Cocoraque Butte pastures could improve forage utilization.

5(221)
Comment: Page 4-3 states,
The following types of data are unavailable for the entire planning area:
• Field inventory of soils and water conditions
Not true. The NRCS inventoried and mapped all soils and water prior to 1990.
Response: BLM used the information from three Natural Resource Conservation Service Soil Surveys: Pinal County – Western Part (NRCS 1991), Pima County - Eastern Part (NRCS 2003), Tohono O'odham Nation – Parts of Maricopa, Pima, and Pinal Counties (NRCS 1999). Most of the NRCS surveys were completed via aircraft. The intent of the statement in the Draft RMP/EIS is to inform the reader that detailed information on the condition of the resources was not always verified by an "on the ground" field survey. However, the BLM did utilize the best available data to perform the analysis.

5(SR201)
Summary Comment: The term "fragile and sensitive soils" and areas mapped as such should indicate if these include highly erodible soils as evaluated and mapped by the Natural Resource Conservation Service's Tucson Field Office
Summary Response: BLM developed the term "sensitive and fragile soils" to describe soils that are located on steep slopes, are highly susceptible to erosion, have high potential for mass failure, or have a shallow depth to bedrock. These soils can be extremely difficult to reclaim. BLM used information from Natural Resource Conservation Service's Tucson Field Office, including data on highly erodible soils, to map areas with sensitive and fragile soils. The glossary has been revised to include a definition of sensitive and fragile soils.

Category 6: Water Resources

6(102)
Comment: S-4 Soil and Water Resources. "However, groundwater within and around the IFNM provides a variety of beneficial uses, including domestic, commercial, agricultural, and industrial uses." Please add "wildlife" to the list of beneficial uses of groundwater.
Response: Under State law, BLM can and does own water rights for beneficial purposes other than administrative sites. Wildlife has been added to the text in the Draft RMP/EIS discussing that BLM can and does show beneficial uses for wildlife, recreation, and in some cases livestock, for various water sources in the IFNM.

6(109)
Comment: Have watersheds been identified, delineated?
Response: Watersheds affecting the IFNM were delineated by USGS and considered during development of the Draft EIS analysis.

6(110)
Comment: Section 3.1.3.2 is incomplete and most of the information that is mentioned seems almost entirely irrelevant. This section should focus on existing water sources within IFNM. No mention is made of how many active wells, gallons of water storage, number of manmade above-ground drinking tanks, stock ponds or water catchments exist and are in use currently in IFNM, or who owns and maintains

them. No mention is made of how many miles of water lines exist in IFNM or who installed and maintains them.
In absence of any mention of how many wells are in use in the IFNM, the last paragraph of Section 3.1.3.2.1 sounds very misleading. It makes it sound as if there are no wells in IFNM.
Response: Total numbers of livestock waters and wildlife waters have been included in Section 3.1.3.2.2 of the PRMP. Involvement of groundwater wells and groundwater impacts would be addressed on a project-by-project basis under a NEPA analysis tiered to the RMP. The same is true of surface water sources.

6(111)
Comment: Page 2-17 Table 2-5. Resource Management Alternatives for Wildlife and Wildlife Habitat Objective 3: "Manage for wildlife water availability to sustain optimal wildlife population sizes as determined by the AGFD. Evaluate and minimize impacts where necessary of current and potential waters on all wildlife species." The word "negative" belongs between "minimize" and "impacts."
Response: The addition of the word "negative" in the objective regarding the evaluation of impacts imposes a value judgment that we would prefer to leave to the reader; the objective is to minimize impacts where necessary.

6(112)
Comment: The Department of Water Resources is the appropriate state authority for the Bureau to work with regarding water resources needed for monument purposes. As described in the subject Draft RMP/EIS, all action alternatives include under "Desired Outcome: Management Goals and Objectives": "Prohibit surface water diversions and groundwater pumping that removes water from the monument or adversely affects the monument's values." The Department suggests that the Bureau maintain close coordination with the Department as it develops strategies to implement water use related measures.
Response: The water policy of the BLM is that the states have the primary authority and responsibility for the allocation and management of water resources within their own boundaries, except as otherwise specified by Congress. BLM cooperates with State governments under the umbrella of State law to protect all water uses identified for public land management purposes. We will work closely with the Arizona Department of Water Resources concerning water use and water rights within the monument.

6(244)
Comment: Section 3.1.3.2.1 Groundwater, page 3-12, first paragraph, second sentence The document states that the USGS projects that subsidence in affected areas of central Arizona "could reach 2 to 14 feet by 2025." The source of this statement should be provided as a reference. The statement is not from Carpenter (1999), the only USGS publication referenced in this section. Other USGS publications that discuss subsidence in Arizona that may be relevant include Hanson and Benedict (1994) and Hanson (1996). Information concerning the findings from USGS water-resource investigations in Arizona can be obtained by contacting the Arizona Water Science Center at (520) 670-6671.
Response: The correct reference for this section is Arizona Department of Water Resources 1998. The full reference information is Regional Recharge Plan, Tucson Active Management Area Institutional and Policy Advisory Group, Arizona Department of Water Resources, Tucson Active Management Area, August 1998. This document is based on USGS publications that discuss subsidence in Arizona by Hanson and Benedict (1994) and Hanson (1996). Information concerning the findings from USGS water resource investigations in Arizona. The text of the Draft RMP/EIS has been revised to say "Based on computer models used by USGS subsidence from groundwater pumping in portions central Arizona could reach 12 feet by 2025 (ADWR 1998).

6(245)
Comment: The BLM has no legal jurisdiction to regulate water uses by anyone with valid existing water rights within the IFNM. Any attempt to do so violates Arizona water law.

Valid existing rights must be respected, per Presidential Proclamation 7320, and this includes water and all other property rights.
Response: BLM is not proposing to regulate water rights within the monument. BLM conforms to applicable State water laws and administrative claims procedures in managing and administering all BLM programs and projects, except as otherwise specifically mandated by Congress.

6(246)
Comment: 2-10 Soil and Water 4. "Prohibit surface- water diversions and groundwater pumping that removes water from the monument or adversely affects the monument's values." This could prohibit wildlife management projects such as wildlife water catchments, vegetation improvement projects, etc. Please clarify within the document under this decision to allow wildlife management and habitat improvement projects.
Response: Surface water diversions and groundwater pumping projects for wildlife management or other habitat improvement projects would be allowed provided the water resource itself was not removed from the IFNM boundary. The language has been revised to clarify its intent:
"Prohibit surface water diversions and groundwater pumping that removes water from within the monument boundary to outside its boundary, or that adversely affects the monument's values."

6(248)
Comment: Draft Goals, Objectives and Alternatives - Soil and Water Resources
"Objective 2: Manage land use to protect and maintain water quality in accordance with all applicable water quality standards."
This is an objective that incorporates a water quality goal that may or may not be attainable. The assumption here is that water quality would naturally meet a certain "standard" without consideration for site-specific standards. This may or may not prove true so the appropriate inclusion for this Objective would be a term to keep water quality from being degraded from what would naturally be there.
Response: In the Proposed RMP/EIS, Chapter 2 Alternatives, Table 2-3 Resource Management Alternatives for Soil and Water, Goal 2 and Objective 2, which both pertain to water quality, have been deleted.

6(249)
Comment: WE OBJECT to Page D-3, Fifth bullet, as written:
"Ensure that land management practices and policies protect the water supply by exercising existing land management authorities under the National Environmental Policy Act (NEPA) to protect and maintain all available water and natural flows within the monument."
This proposed regulation violates Arizona water law. Some flows have diversions to stock ponds, and those waters are legally appropriated.
Response: BLM agrees that the State has the primary authority and responsibility for the allocation and management of water resources within Arizona, including flow diversions for stock ponds and other legally appropriated uses. BLM is responsible for ensuring that its land management practices and policies applied within the monument protect the water supply by exercising existing management authorities under NEPA to protect and maintain all available water and natural flows within the monument.

6(251)
Comment: Draft Goals, Objectives and Alternatives - Soil and Water Resources
"Goal 5: Manage watersheds to maintain, where healthy, or restore, where degraded, upland, aquatic, riparian and xeriscopic ecosystems, water quality, and water quantity."
SBM objects to the use of the term "restore." By including the term "water quantity" along with the term "restore" the implication is that there will be an increase in water quantity. Because water quantity is a function of rainfall, this does not make sense...The inclusion of the "water quantity" term is troubling and

SBM is concerned that acquisition of water rights may become an objective through the use of administrative action for which no public input is gathered, even though water rights were not reserved as part of the monument proclamation.
Response: The glossary has been updated to include the term "restore." BLM would restore watersheds to improve conditions for the protection of monument objects or to provide improved habitat for special status species or priority vegetation species in the future. The term "restore" is used to return an area to a baseline condition that is considered suitable for sustaining the health and viability of an ecosystem. Actions intended to restore water quantity would primarily be focused on soil and vegetation treatments in upland and xeriscopic ecosystems that could return water movement to normally functioning conditions. BLM could pursue a Federal reserved water right if deemed necessary in the future, and would comply with all legal process requirements if such an actions was taken; however there are no current plans to do this. Refer also to comments and responses 6(276) and 7(229) for additional information regarding restoration in the monument and water rights.

6(276)
Comment: No mention is made of existing unmet water needs for the monument. This is one of many reasons to object to the proposed regulation in Chapter 2 where the BLM says it will attempt to acquire as much water as it can get. If there is no identified need, what justifies the waste of taxpayer dollars doing it?
Response: There is no reference to regulations designed to obtain waters from outside the boundaries of IFNM in Chapter 2. Table 2-3, Soil and Water Resources, states that BLM would prohibit diversions of surface-water and groundwater pumping that would take waters away from the IFNM or adversely impact the monument. The water policy of the BLM is to acquire and perfect the water rights necessary to carry out public land management purposes through State law and administrative claims procedures unless a Federal reserved water right is otherwise available, and a determination is made that the primary purpose of the reservation can be served more effectively through assertion of the available Federal reserved water right. BLM's policy recognizes the primacy of State control of water resources by stating that two of the objectives of the program are to cooperate with State governments and conform to applicable State water rights laws. This would include the evaluation of unmet needs in the monument.

6(507)
Comment: Additionally, the proclamation specifically does not reserve water rights, however several of the administrative actions seek to do just that.
Response: While no Federal law has been established to reserve water, the BLM has been provided guidance to work with State authorities to ensure adequate supplies of water resources are available for monument purposes.

6(766)
Comment: Section 3.1.3.2.2 states, Surface water flows within the IFNM are entirely ephemeral. This asserts that aquatic ecosystems do not exist within the IFNM. Map 3-4 shows only xeroriparian plant communities and the text in section 3.1.4.1.2 states, The term "xeroriparian" (dry wash) is used to describe this plant community within the IFNM because both riparian scrublands and riparian woodlands lack surface water most of the year. Because no riparian systems or aquatic systems exist in the IFNM, these terms should be deleted.
Response: Desert ecologists include the vegetation in washes (arroyos) as "dry riparian" habitats, which generally are classified into two types, xeroriparian and mesoriparian. Xeroriparian watercourses are small washes or streams. They are distinguished from the adjacent plant communities of the Colorado River Valley or Arizona Upland areas in that they have a higher density of plants and more foliage, though they often have similar species. Though they may carry water only a few hours a year or even less, they share most of their defining characteristics with traditional wet riparian habitats. They are chronically disturbed, unstable sites where water and nutrients are harvested and concentrated from larger

areas (watersheds). Like wet rivers, washes are corridors for dispersal of plants and animals that need more water than the surrounding habitat.

6(767)
Comment: Our cooperators know this from the being present on the ground 24/7/365 in the IFNM year in and year out, and repeatedly observe the obvious. We strongly encourage the BLM partner with and habitually utilize this privately funded, willing and cooperative human resource. Literally millions of dollars worth of private investment in the IFNM water infrastructure are entirely ignored in the DRMP/EIS. No mention is made in the EIS about what would happen to the wildlife if these human-developed livestock waters or the continuous privately financed maintenance of those sources would cease to exist, and no estimate is made of the approximate dollar value of that annual maintenance. The EIS should address these issues or the BLM could eventually face severe budget shortfalls as a result of the inadequate analysis.
Response: We appreciate the efforts of ranchers and special interest groups in maintaining water development projects. The BLM will continue to seek partnerships with ranchers, universities, State and Federal agencies, and other science-based organizations in designing and implementing the RMP and monitoring conditions in the IFNM. BLM looks forward to working with groups to manage, maintain, and monitor resources within the monument.

6(SR98)
Summary Comment: The DRMP does not address impacts to valid existing rights to groundwater and surface water as a result of management action 4 under alternatives B, C and D.
Summary Response: The Proclamation does not supersede or preempt other applicable statutory guidance; the Proclamation states that "nothing in this reservation shall" be construed as a relinquishment or reduction of any water use or rights reserved or appropriated by the United States on or before the date of this proclamation." Therefore, no decisions made by BLM in the RMP are anticipated to impact rights to groundwater or surface water. The water policy of the BLM is to acquire and perfect the water rights necessary to carry out public land management purposes through State law and administrative claims procedures unless a Federal reserved water right is otherwise available, and a determination is made that the primary purpose of the reservation can be served more effectively through assertion of the available Federal reserved water right. BLM's policy recognizes the primacy of State control of water resources by stating that two of the objectives of the program are to cooperate with State governments and conform to applicable State water rights laws. This would include the evaluation of unmet needs in the monument.

6(SR243)
Summary Comment: Section 3.1.2.2 fails to describe the complex and convoluted history of surface water and its historic management, including surface water manipulations in the immediate area in the early 1900s. The entire surface hydrological history of the region is ignored. This information is vital to create a local and regional context for understanding surface water in the IFNM.
Summary Response: After considering the comment, the cumulative impacts analysis has been adjusted to include additional information about past surface water manipulations within the cumulative impact area. The discussion regarding past water development related to agricultural practices has been revised to "Associated with changes in agricultural practices and land use, the Santa Cruz River underwent a period of pronounced arroyo entrenchment during the late 1800s. Streamflows in the region have been diverted by Tribes in the area in the late 1800s. Modifications to streamflow included dams and diversions of the Santa Cruz river to irrigate crops and the pumping of river water from wells located near the banks (Minckley 1999)."

6(SR247)
Summary Comment: The goal to "ensure that all waters on public land meet or exceed Federal and State water quality standards" violates the multiple use mandates of FLPMA and NEPA because the waters on

public land reside in ephemeral streams, tanks, ponds, and catchments. Forcing the rightful owners of this water to bring all these sources up to drinking water standards could mandate that all water uses on these lands be closed.
Summary Response: The goal of ensuring that all waters on public land meet or exceed Federal and State water quality standards has been deleted.

6(SR250)
Summary Comment: Section 3.1.3.2.2 is incomplete and inaccurate. Livestock and wildlife do not depend heavily on ephemeral pools because these water sources are available a maximum of only about two or three weeks out of a good rain year. Amphibians, reptiles, some mammals and a large variety of spiders and insects survive drought and high temperatures by hibernating underground. Millions of Sonoran Desert toads (Bufo alvarius) survive long dry seasons in the IFNM uplands without any standing surface water available to them.
Summary Response: While ephemeral pools within the monument do dry up within a short time period, BLM agrees with the comment that these ephemeral pools provide an important resource that is part of the adaptations made by desert wildlife and plants. The Proposed RMP/EIS has been revised to clarify that livestock may not depend on ephemeral pools as watering sites.

6(SR252)
Summary Comment: The concern is that the administrative actions will place more regulatory burden on landowners, permittees, and users of the monument. It is recommended that BLM communicate with State authorities regarding the monument's need for water resources and to identify existing and future water resources on public lands and develop a cooperative agreement on the protection of water resources within the monument.
Summary Response: Under State law, BLM can and does own water rights for beneficial purposes other than administrative sites. BLM can and does show beneficial uses for wildlife, recreation, and in some cases livestock, for various water sources. The administrative actions in the Draft RMP/EIS are consistent with State laws regarding water rights. BLM will work closely with the Arizona Department of Water Resources concerning water use and water rights within the monument.

6(SR253)
Summary Comment: The draft goals, objectives, and alternatives do not appear to recognize valid existing water rights. In addition, Management Action 4 indicates the possibility of taking surface water and groundwater rights within the IFNM.
Summary Response: Management of the monument recognizes all valid existing rights, and these are specifically included in the Proclamation and recognized as part of management common to all alternatives (see Section 2.3.1). Section 4.2.2, Assumptions for Analysis, has been revised to include existing rights as part of the following assumption: "The alternatives would be implemented in accordance with laws, regulations, standard operating procedures, and existing rights. The opportunity to expand mining operations could restrict the location of roadways or utilities to lands not managed by BLM."
The water policy of the BLM is to acquire and perfect the water rights necessary to carry out public land management purposes through State law and administrative claims procedures unless a Federal reserved water right is otherwise available, and a determination is made that the primary purpose of the reservation can be served more effectively through assertion of the available Federal reserved water right. BLM's policy recognizes the primacy of State control of water resources by stating that two of the objectives of the program are to cooperate with State governments and conform to applicable State water rights laws. This would include the evaluation of unmet needs in the monument.

6(SR497)
Summary Comment: Commenters request information regarding a drought plan for IFNM.
Summary Response: BLM and the State of Arizona developed an operational drought plan that was finalized in October 2004. The operational drought plan identifies a process for communication and coordination among Arizona State agencies, Federal agencies, tribal governments, State lawmakers, water users, resource managers, and scientists. BLM, as a member of the Interagency Coordinating Group, will provide policy guidance for plan implementation, agency emergency response options, and plan review and modification. The BLM is also a member of Arizona's Monitoring Technical Committee and will continue providing an essential role in tracking changes in climate and physical conditions and providing forecasts of likely future conditions. The Monitoring Technical Committee monitors and identifies conditions throughout the state on an ongoing basis and detects and requests that the drought status be changed as data and conditions warrant.
BLM has the ability to modify management actions in this plan if changing environmental conditions, such as a major drought event, warrant such modifications. This can occur through adaptive management procedures or through more extensive efforts such as plan amendments and revisions. Numerous processes already in place, such as activities associated with BLM's standards and guidelines process, also address drought conditions.

Category 7: Vegetation

7(187)
Comment: In that context, the Plan should commit to a biannual monitoring protocol that assesses ecological and biotic health using the current best management practices under each of the alternatives. The monitoring should result in trend analyses, done in ways that can be peer reviewed and verified; and when downward trends become evident, the agency should be compelled to produce mitigation strategies, resource that mitigation, and implement actions in a timely fashion that minimize harm or loss of proper ecological functioning. To the extent that monitoring identifies human use or impacts that contribute to the downward trend, the agency should move immediately to limit or eliminate the adverse impact by halting deleterious uses until full recovery has occurred.
Response: Section 2.3.5 has been revised to include additional discussion on monitoring and adaptive management. A more detailed monitoring plan will be included in the approved RMP that includes indicators, protocol, frequency, and information that would trigger agency action to correct undesirable trends. Information gathered on resources in the IFNM is not comprehensive and will continue to be adjusted as new information is obtained and conditions change on the IFNM. As additional information is collected, it will be used to adapt management approaches and provide additional protection, if necessary. BLM will continue to seek partnerships with universities, State and Federal agencies, ranchers, and science-based organizations in designing and implementing inventory and monitoring of the IFNM so that protection of biological resources within the IFNM is ensured.

7(222)
Comment: Vegetation 4.3.4.1 Impacts to All Alternatives
"However, mining activities at valid existing claims (approximately 4590 acres) could cause localized surface disturbance and remove existing vegetation resources. This could locally increase opportunities for establishment of noxious weeds and invasive species."
Mining activity in and of itself does not increase opportunities for establishment of noxious weeds. Noxious weeds would already have to have been established in the area to spread to disturbed areas. If this is true for mined areas, it would also be true for every other surface disturbing activity. Impacts should be analyzed across all surface disturbing activities and not just mining activity.
Response: The Draft RMP/EIS analyzed in Sections 4.3.4.1 through 4.3.4.4 the effects of other potential surface-disturbing activities such as recreation use and utility and right-of-way corridors. The possibility

of increased or decreased opportunities for noxious weed establishment is stated with regard to all of these surface-disturbing activities, not just mining.

7(228)
Comment: Draft Goals, Objectives and Alternatives - Vegetation
"Goal 2: Manage each vegetation community to maintain its natural range of variation in plant composition, structure, and function. Communities within the monument include: (1) paloverde-cacti mixed scrub; (2) jojoba chaparral; (3) creosotebush - white bursage; (4) curlymesquite grass-scrub; and xeroriparian."
This goal should end after function, as identifying the communities in the goal could severely restrict future refinement of delineating plant communities.
Response: The refinement and potential future categorization of vegetation communities would not be restricted by the RMP-level plant communities as described in Goal 2.

7(230)
Comment: Draft Goals, Objectives and Alternatives - Vegetation
Management Actions, Allowable Uses, and Use Allocations
Numbers 3 and 4 should be combined into one management action on controlling invasive species. Numbers 5, 6 and 8 include the term "restoration." SBM objects to the term and requests that restoration be changed to reclamation. Based on the issues presented, the natural changes in vegetation over time would be halted by restoration.
Response: The two management actions focus different aspects of noxious weed and invasive species management. Management Action 3 in Table 2-4 Resource Management Alternatives for Vegetation discusses the overall approach and methods used to eradicate or control noxious weeds and invasive species. Management Action 4 in Table 2-4 discusses establishing priorities to control noxious weeds and invasive species with a substantial impact on native plant communities and wildlife such as buffelgrass, Sahara mustard, or other species that may become established. The vegetation administrative action giving "priority treatment to priority species and habitats." has been deleted because this was analyzed through similar language under vegetation decision 10. Also see summary comment and response 7(SR229) for additional information regarding restoration.

7(232)
Comment: Map 3-4 shows areas of priority vegetative habitat located on state land and private land. The maps should be revised to show only the areas of priority vegetative habitat on BLM land.
Response: Vegetation resources are shown across all land ownerships on Map 3-4 to best illustrate the ecological relationships throughout the monument. However, acreages presented in the Draft RMP/EIS are limited to public land administered by BLM.

7(233)
Comment: Draft Goals, Objectives and Alternatives - Vegetation
Management Actions, Allowable Uses, and Use Allocations
There are no real alternatives presented. At a minimum, SBM suggests the following alternatives be added to each management action:
Alternative C: Same as Alternative B, while allowing for mitigation efforts associated with legal activities in areas with valid existing rights.
Alternative D: Same as Alternative B, while allowing natural processes for mitigation efforts associated with legal activities in areas with valid existing rights.
Response: The range of alternatives presented considered existing legal rights for all management actions. The suggested changes to the alternatives are of no consequence because they are tied directly to legal activities carried out under valid existing rights, which are already provided for under each alternative.

7(234)
Comment: Draft Goals, Objectives and Alternatives - Vegetation
Implementation-Level Decisions
1. Fence along designated routes, as necessary, to prevent damage to sensitive and unique vegetation and minimize the spread of invasive species and noxious weeds.
Fencing will not prevent the drift of seeds from invasive species or their propagation in other areas. SBM suggests deleting the reference to invasive species for this decision.
Response: Fencing along designated routes reduces potential disturbance to existing plants caused by vehicle tires or other surface-disturbing activities. The removal of existing vegetation can provide areas where noxious weeds and invasive species could become established by seeds drifting in from other areas.

7(237)
Comment: 2-13 Vegetation 2. "Removal and/or use of living or dead and down native plant material is prohibited, with the following exceptions, when specifically authorized:" The Department supports Alternative D as the preferred alternative to allow the "collection of dead and down wood for firewood use while camping within the IFNM." Second paragraph starts off with an incomplete sentence.
Response: The Draft RMP/EIS alternatives considered allowing the removal of dead and down wood for firewood use while camping within the IFNM. The proposed alternative prohibits this use largely because the removal of dead and down wood can greatly affect wildlife habitat, especially in the IFNM because of the slow decay rate of ironwood trees. The biological survey for the IFNM found that the production rate of downed woody material is very slow (Dimmitt 2000). Furthermore, a study in both the east and west units of Saguaro National Park found that there is a positive correlation between percent cover and rodent populations (Duncan 1990). The dead and down wood of the IFNM provides habitat for a number of small mammals and reptiles, which are important to the ecosystem as prey items for larger predators such as the cactus ferruginous Pygmy-owl.

7(240)
Comment: Buffelgrass and other exotic weeds put the entire Sonoran Desert ecosystem at risk. Effective control must be a top priority.
Alternative 1. No action is simply not acceptable.
Alternative 2. Manual Removal Only is inadequate and impractical.
Alternative 3. Careful and judicious use of herbicide taking every precaution to avoid collateral damage (as outlined in comments submitted by Sierra Club) with supplemental hand removal in areas where it can be effective looks like the best option.
Response: BLM agrees that effective control of invasive species such as buffelgrass is a top priority, and that Alternative C, the proposed alternative, provides the best management tools to deal with this priority work. The Draft RMP/EIS evaluated a range of alternatives for the eradication and control of noxious weeds and invasive species. All alternatives pursue an integrated weed management approach and include administrative actions to monitor and evaluate the effectiveness of noxious weed treatments.

7(241)
Comment: Horseback riding is mentioned. This is a terrific vector for the introduction of invasive species. With the existing threats to the Sonoran Desert, why would this be allowed? How will BLM insure that invasive species are not introduced this way?
Response: Invasive species can potentially be introduced by a variety of methods, including horses, recreation use, wind, livestock, and adjacent land use activities. Through implementation of the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration and other monitoring, BLM can detect weed vectors and change management if necessary. BLM will also pursue an integrated management approach under all alternatives and include administrative actions to monitor and evaluate the effectiveness of noxious weed treatments.

7(511)
Comment: Specifically, the following activities should not occur within the 8 areas identified as possessing wilderness characteristics:
• Permanent or temporary roads;
• Use of motorized equipment or motorized vehicles;
• Landing of aircraft (except in emergencies);
• Mechanical transport;
• Structures, developments, or installations; and
• Commercial enterprises.(8) Forest/Vegetation Health. Insects, disease, and invasive species may be controlled if it is determined that it is necessary to meet the minimum requirements to administer and protect these lands.
Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the land with wilderness characteristics, or in special instances when the loss to resources may cause adverse impacts to wilderness characteristics.
Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness characteristics.
Response: BLM will manage areas allocated for protecting wilderness characteristics in the Proposed Plan to maintain naturalness, solitude, and opportunities for primitive recreation. The activities mentioned in the comment would be inconsistent with this management except during emergencies. Likewise, the control of insects, disease, or invasive species would be implemented in a manner consistent with protecting wilderness characteristics. Prohibition or restriction of many of the activities listed above would result from management actions under other programs, such as visual resource management, recreation, and travel management. In the Proposed Plan, for example, use of motorized equipment or vehicles would be prohibited in areas managed to protect wilderness characteristics based on travel management designations. However, in compliance with current policy, BLM cannot apply the non-impairment standard from the interim management policy formerly applied to wilderness study areas.

7(512)
Comment: Draft Goals, Objectives and Alternatives – Vegetation
Management Actions, Allowable Uses, and Use Allocations
Number 1 requires minimal surface disturbance in all cases, SBM suggests the addition of the following alternatives:
Alternative C: Same as alternative B excepting disturbances that are legally allowed due to valid existing rights or those listed disturbances that are allowed for the implementation of one of the other goals.
Alternative D: No specific restriction on surface disturbance.
Response: The language of the alternatives is specific to minimize and/or restrict surface disturbance; surface-disturbing activities are not prohibited. Surface disturbance from existing rights for mineral development is included under all alternatives. To include an alternative that would not have any restriction on surface disturbance would not be consistent with the intent of the Proclamation, nor would it provide for protection of objects in the IFNM. It would also not be consistent with the mineral regulations that prohibit undue and unnecessary degradation.

7(514)
Comment: The preferred Alternative (C) should be amended through an ecosystem composition and functioning analysis. It should be amended to commit to a monitoring and mitigation discipline that protects natural values.
Response: See Section 2.3.5 for information on BLM's commitment to monitoring the IFNM RMP and monument resources. As discussed in this section, BLM will initiate the opportunity for the public to be involved in the development of the IFNM monitoring plan within six months of the final approval of the

RMP. An ecosystem functioning and composition analysis would serve as a useful component of a monitoring strategy for the IFNM, and will be considered in its development.

7(515)
Comment: The Ironwood Forest National Monument is a component of the Sonoran Biotic Province and includes the Shrevos Arizona Upland Subdivision of the Sonoran Desert including some warm Desert Shrub and Lower Colorado Subdivision. It is a landscape in transition experiencing rapid fragmentation, diminution of soil crust, loss of vegetative cover, soil loss and erosions, and significant infestation of non-native species. Non-natives include red brome (Bromus rubens), buffelgrass (Pennisetum ciliare), Arabian and Mediterranean grass (Schismus spp.), Sahara mustard (Brassica tournefortii), and wild barley (Hordeurn murinum), among others. It should be noted that up to 50% of the vegetative cover in this landscape may be ephemerals, which are diminished during drought. This transformation is occurring in the context of rapid urbanization, grossly expanding human corridors, and significant drought and aridification of climate.
The DRMP/DEIS lacks a longitudinal evaluation of this transition and proposes no alternative specifically designed to reduce habitat fragmentation sufficiently, stop loss of crust, soil and recover bare ground, or reduce non-native invasion. Alternatives A, C and D will further aggravate the degradation of the vegetation, soils and resultant biotic community, by exposing the system to additional use and the resultant disturbances.
Response: BLM used the best information available to evaluate the conditions of the Sonoran Desert within the IFNM and considered the potential effects of fragmentation, disturbance to soil, and spread of non-natives. Because the area is managed as a national monument, BLM's proposed management is to protect monument objects including vegetation while also providing for multiple use. Though BLM does not disagree with your assessment, a "longitudinal evaluation" as you suggest could quickly become speculative. Since NEPA does not require, in fact discourages speculative analysis, we have chosen not to take such an approach. Instead, since BLM in general, and the national monument specifically, manage only a small portion of the ecoregions you describe, we have chosen to monitor changing conditions and respond to changing management demands through adaptive management. Please see section 2.3.5 for a description of the adaptive management approach we are undertaking. Refer also to summary comment and response 7(808) for additional information regarding a revised management decision on the use of non-native species for reclamation.

7(516)
Comment: In terms of the vegetation complex, there is evidence that it is stressed by current use patterns and further frustrated by variations in climate. The plant community is one of the valued objects and the foundation for other objects of value. The BLM must design an alternative plan of action that conserves and restores as a priority.
Response: BLM considered several alternative management decisions related to the management of vegetation as part of the Draft RMP/EIS. Because the area is managed as a national monument, BLM's proposed management is to protect monument objects including vegetation while providing for multiple use. Refer also to summary comment and response 7(808) for additional information regarding a revised management decision on the use of non-native species for reclamation.

7(518)
Comment: Desired plant community objectives will be developed to assure that soil conditions and ecosystem function described in Standards 1 and 2 are met. " Developing an objective alone will not assure a condition will be met. Well-designed scientific studies and management of range vegetation under the guidance of a person formally trained and sufficiently experienced in range management sciences is also required. Under each of the current four draft alternatives, this vital part of the management of IFNM is conspicuously missing.

Response: The statement referred to in the comment is an excerpt from Land Health Standard 3: Desired Resource Conditions, of the Arizona Standards for Rangeland Health. This statement directs BLM to develop objectives for vegetation management in RMPs that comply with Standards 1 and 2. The IFNM RMP includes objectives that meet this direction. BLM used an interdisciplinary team to develop the RMP objectives, including those for vegetation and rangeland management.

7(519)
Comment: Limit fugitive-dust pollution by reducing disturbance to soils. Most seeds require disturbances to the soil in order to germinate. Holechek, Baker and Boren (2005)2 have concluded in an extensive scientific literature review,
Response: Limiting fugitive dust pollution by reducing soil-disturbing human activities or livestock grazing activities would not reduce the ability of seeds to germinate, as this would not reduce naturally occurring changes to the soil surface such as erosion, storm-water runoff, or wind-blow dust.

7(568)
Comment: There appears to be no list of invasive plant species. How will these be managed? What is the plan? The strategy?
Response: Section 3.1.4.4 discusses the noxious weeds and invasive species that are considered to be of the greatest concern in the IFNM. BLM pursues an integrated management approach under all alternatives and includes decisions to monitor and evaluate the effectiveness of noxious weed treatments.

7(569)
Comment: Recommendation: The BLM must modify Alternative B to incorporate extensive scientific analysis that will model trend among the various land uses being proposed in the DRMP/DEIS. The BLM must choose Alternative B for management of vegetation resources on the Ironwood Forest National Monument and disallow the use of any non-native species in Monument projects. We offer to work with the BLM and to help organize and resource the strategy for moving forward that is suggested here, including development of the science necessary to inform this strategy. Attachments: Appendix E 1. Bowers, J.E. T.M. Bean, and R.M. Turner. 2006. Two decades of change in distribution of exotic plants at the Desert Laboratory, Tucson, Arizona. Madrono 53(3): 252-263.
Response: Information from Bowers et al. 2006 has been added to Section 3.1.4.4. to address non-native vegetation trends, as suggested. The Proposed RMP includes management actions and implementation-level decisions in Table 2-4 to allow BLM to do the type of analysis and monitoring suggested.

7(SR223)
Summary Comment: The Draft RMP/EIS does not include a definition of the word “enhance.” This could leave the interpretation of the word “enhance,” necessary management actions, and measurement of enhancement up to the courts. Also because conservation incorporates reversal and elimination of threats, the terms “enhance” and “restore” are not necessary in the Draft RMP/EIS.
Summary Response: Throughout the document, the words “enhance” or “enhanced” are used in various places to indicate a desire to improve the productivity, value, or quality of resources or resource uses within the IFNM while meeting the intent of the Proclamation, which is to protect objects within the IFNM. The word “enhance” has been added to the glossary in the Proposed RMP/Final EIS. Although some benchmark or baseline data are available, monitoring and adaptive management will be conducted as part of implementation planning that will occur on a site-specific basis to ensure conditions of monument objects and resources are maintained and/or improved as part of the overall monument conservation and management strategy.

7(SR224)
Summary Comment: Explain appropriate cover and mix of natural plant species with good vigor. This does not seem to be a clear goal related to desired vegetation conditions.

Summary Response: Goal 1 has been revised to read "Assure adequate vegetative cover with an appropriate mix of natural plant species that meet acceptable range health standards based on current ecological conditions."

7(SR225)
Summary Comment: The impacts of mining, motorized travel, recreation, livestock grazing, lands and realty, water developments, and recreational shooting must be considered in the context of protecting and preserving the vegetation of the IFNM. Broad-scale surface disturbance fails to meet the objective of protecting vegetation, and the Draft RMP/EIS fails to adequately consider the cumulative impacts of all the proposed uses on the desert landscape.
Summary Response: The Draft RMP/EIS analyzes a range of alternatives that allow for varying levels of surface disturbance; however, none of the alternatives propose or authorize broad-scale surface disturbance. All alternatives are consistent with the Proclamation designating the IFNM and its intent of protecting objects within the IFNM. Cumulative impacts are addressed based on the incremental affects of BLM management in addition to the other past, present, and reasonably foreseeable actions on the IFNM. The cumulative impacts on vegetation have been revised to indicate the affect of surface disturbance from recreation, development, and other surface-disturbing activities and their potential effects on the IFNM.

7(SR227)
Summary Comment: Several items listed in the administrative actions seem to go beyond a simple administrative action and seek to impose additional regulatory burden on permittees, landowners, and users in and near the IFNM, including the action to "give priority treatment to priority species and habitats when potentially incompatible uses or actions are entertained; aim at totally offsetting or avoiding impacts to the priority species or habitats."
Summary Response: The vegetation administrative action giving "priority treatment to priority species and habitats" has been deleted in the Proposed RMP/EIS because this was analyzed through similar language under Table 2-4 Resource Management Alternatives for Vegetation Management, Decision 10.

7(SR229)
Summary Comment: We object to the term "restore" because there is no measure that can be associated with this term, as it pertains to some condition in the past. Restoration can be an unattainable objective because of practical and economical constraints. Any reclamation effort should be on a case-by-case basis reflecting what is practically achievable and cost effective.
Summary Response: The glossary has been updated to include a term for "restore" as it applies to habitat. BLM would restore areas to improve conditions for the protection of monument objects or to provide improved habitat for special status species or priority vegetation species in the future. The term "restore" is used to return an area to naturally occurring conditions. All reclamation efforts are undertaken on a case-by-case basis reflecting what is practically achievable and cost effective.

7(SR231)
Summary Comment: Management should protect sensitive and unique vegetation type 1 assemblages, including the paloverde-cacti-mixed scrub community, jojoba chaparral community, creosotebush-white bursage community, curly-mesquite-grass scrub community, and the xeroriparian community. There is no clear definition of "sensitive and unique vegetation," nor is there a protocol for determining how certain species achieve this status. There is no clear documentation of how the list of vegetation types was arrived at or what criteria were used for their designation. There are no alternatives in the management plan for priority vegetative habitats, which contain sensitive and unique vegetation. Alternatives B, C, and D should include differences in how these areas are managed. Objectives 2, 4, and 5 can be combined to one objective: "Sensitive and unique vegetation assemblages, species, and habitats will be managed to

maintain the vegetative community complex while recognizing valid existing rights and appropriate catastrophic wildfire dangers."
Summary Response: Sensitive and unique vegetation assemblages were determined using information from the Arizona-Sonora Desert Museum. These vegetation assemblages differentiate the Sonoran Desert vegetation and areas that provide important wildlife habitat. The goals and objectives for these priority vegetation communities reflect the intent of the Proclamation to protect monument objects. BLM vegetation management decisions are consistent with these goals and objectives. Management actions for resource uses vary by alternative, and the affects of these decisions on priority vegetation communities are considered in Chapter 4.

7(SR235)
Summary Comment: Within the IFNM only native species should be used to prevent the spread of non-native species and provide opportunities to educate the public about plants that are native to the Sonoran Desert.
Summary Response: In the Proposed RMP/EIS, Table 2-4 Resource Management Alternatives for Vegetation, Alternative C (preferred alternative in the Draft RMP/EIS) has been changed to "Use native plants for all restoration projects." This is the same as Alternative B.

7(SR236)
Summary Comment: The highly diverse and rich vegetation warrants the most stringent management and habitat restoration with an emphasis on monitoring and combating invasive species such as buffelgrass. I support the goals outlined in the draft to have the appropriate cover and mix of natural native plant species so that each vegetation community is maintained within its natural range of variation in plant composition, structure and function and that the diversity and distribution of natural native plant communities that presently exist are protected, enhanced, and restored.
Summary Response: Under all alternatives BLM would manage the IFNM to retain the natural range of variation in plant composition, structure and function. BLM will restore areas as necessary to maintain vegetation resources within the IFNM.

7(SR238)
Summary Comment: BLM did not incorporate vegetation inventory information collected by NRCS on grazing allotments.
Summary Response: While BLM did use information from NRCS with regard to some resources on the IFNM, information from the Arizona Sonora Desert Museum was used to characterize vegetation resources in the monument. Information from NRCS regarding allotments is used during the assessment of an allotment.

7(SR242)
Summary Comment: Section 3.1.4.4 is misleading regarding the number and presence of invasive species within the IFNM. This section implies that all 54 non-native species are invasive. The study was performed by the Arizona Sonora Desert Museum and provides a well-documented discussion.
Summary Response: BLM used the information from the Arizona Sonora Desert Museum studies and information from BLM monitoring to analyze noxious weeds and invasive species in the IFNM. The text in Section 3.1.4.4 has been revised to indicate that there are 54 non-native species that occur within the monument, but many of them are rare to uncommon.

7(SR338)
Summary Comment: Changes in livestock grazing place a burden on livestock operators, taxpayers, and could harm resources in the monument.
Summary Response: Under all alternatives, livestock grazing would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration,

which establish measurable indicators of rangeland health. Inventory and monitoring data will be collected on a regular basis to determine achievement of land health standards, or progress toward achieving standards. The IFNM Draft EIS considers an alternative (Alternative B) that would remove livestock grazing from the IFNM as existing leases expire. Adjustments in stocking rates, seasons of use, etc. could be made under any of the alternatives but would be addressed under an implementation-level NEPA analysis.

7(SR510)
Summary Comment: Due to population pressures and climate change management pressures to the lanscape, subsidies for browse, artifical water sources and non-native plant species should be precluded from expanding. Subsidies should be removed when it's documented that it's changing species composition, behavior, and biotic relationships.
Summary Response: BLM manages the IFNM consistent with Arizona's Standards for Rangeland Health and Guidelines for Grazing Administration, which includes consideration of vegetation composition. BLM continues to monitor all land uses to meet the needs of biological resources while maintaining lands as available for multiple use to the extent allowable based on the Proclamation establishing IFNM. As additional information about wildlife resources (including the impact of management activities) is collected from monitoring efforts, management actions would be adjusted to protect resources consistent with goals and objectives of the IFNM. As noted in Section 2.3.5, adaptive management will be used to address the uncertainties of natural resource management, including population pressures and climate change, to further protect the objects of the monument.

7(SR768)
Summary Comment: In areas near livestock grazing water sources and areas disturbed by cattle, there are 24 native plant species not found elsewhere in the IFNM. These plant species are part of the monument objects and BLM is required to protect them.
Summary Response: Vegetation species may be influenced by numerous factors, including livestock grazing. The distribution of native species in areas grazed by livestock and near livestock water sources are objects of the monument and are protected through the alternatives presented in the plan. Further monitoring would be required to determine if these 24 species are dependent on livestock grazing to maintain populations.

7(SR808)
Summary Comment: Non-native plants should be removed from IFNM and only native plants used in revegetation efforts.
Summary Response: In the Proposed RMP/EIS, Table 2-4 Resource Management Alternatives for Vegetation, Alternative C (preferred alternative in the Draft RMP/EIS) has been changed to "Use native plants for all restoration projects." This is the same as Alternative B.

Category 8: Wildlife and Wildlife Habitat

8(255)
Comment: . The ash throated flycatcher is listed as a migratory species. It may be migratory elsewhere but resides year-round in the Silverbell Mountains.
Response: BLM considers migratory birds to include those listed in Title 50 Wildlife and Fisheries of the Code of Federal Regulations, Section 10.13, which includes the ash-throated flycatcher.

8(262)
Comment: Wildlife waters should be analyzed relative to their overall impact to the system and the multitude of wildlife and not just a single species.

Response: BLM would analyze wildlife waters and their potential impacts on ecological systems and other wildlife during site-specific NEPA analysis.

8(576)
Comment: Page 3-18, under the heading, Migratory Birds, states,
"The most characteristic species include ... purple martin, Bell's vireo, Lucy's warbler, and sage sparrow." I have yet to observe a purple martin, a Bell's vireo, a Lucy's warbler or a sage sparrow in the Silverbell Mountains. I have hunted and hunted for a Lucy's warbler and not found one, despite finding six other warbler species. The aforementioned species may be characteristic of Sonoran desert-scrub habitat according to a college textbook, but they are not characteristic of birds found in the Silverbell Mountains.
These errors are repeated on page 3-39 in section 3.1.6.3.
Response: BLM has modified language in the Proposed RMP/EIS in Section 3.1.5 to acknowledge that bird and wildlife species, in addition to those referenced, also may occur within the IFNM. Additional research and studies may also discover species as indicated in the Proclamation. Species in the Draft RMP/EIS that are listed as migratory is based on the Migratory Bird Treaty Act.

8(593)
Comment: The BLM should modify Alternative B to incorporate a mandatory trend analysis by qualified scientists over the last three decades to documents changes in the biotic community that allow accurate and useful modeling of future potentialities. This analysis should consider density and intensity of human use, including transportation, agriculture, recreation and climate as influences. This analysis should document the status of the existing vegetative community including diversity of both native and non-native plants. It should quantify the condition of soil crust as the principal foundation for decomposition and aridification, which is essential for the food chain for all the rest of the life in the Monument. It should assess adequacy of connected habitat sufficient to host a self-sustaining genetic community. It should also assess the status of all vertebrate and invertebrate pollinators.
Response: As required by NEPA, BLM has used the information available to provide protection of resources and evaluate the affect of decisions. As required by the Proclamation, the management actions and strategies defined in the RMP were developed to protect wildlife species and their habitats so that "proper care and management of the objects" is ensured. However, as noted above, information gathered on wildlife in the IFNM is not comprehensive and will continue to be adjusted as new information is obtained and conditions change on the IFNM. As additional information is collected, it will be used to adapt management approaches and provide additional protection, if necessary. BLM will continue to seek partnerships with universities, State and Federal agencies, ranchers, and science-based organizations in designing and implementing inventory and monitoring the IFNM so that protection of biological resources within the IFNM is ensured.

8(599)
Comment: The effective functioning of the ecology is wholly dependent upon the complex of relationships in a special context that assures population and genetic viability over extended time. See Sanderson 2006. The microbiotic community is ignored, as are the relationships between species including pollinators; invertebrate and reptile populations are conspicuously absent from the DRMP/DEIS.
Response: Invertebrates and microbiotic species have not been listed in the RMP; however, ongoing and future wildlife studies would refine the list of species occurring within the IFNM, which would be updated to include invertebrates and microbiotic species, providing BLM a better understanding of the relationships of environmental components for applying appropriate management. Management of the IFNM and the biological communities within it as proposed in the RMP is based on the best information available to us now, and BLM is committed to explore opportunities to learn more through studies and research and will use adaptive management to adjust management as new information emerges. In

addition, BLM is mandated to protect and manage threatened, endangered, candidate, proposed, and BLM sensitive wildlife species and their habitat. BLM is also required to protect and manage sensitive species jointly identified with the appropriate State agency. The species listed in RMP are based on county-level information and existing survey data and do not contain all species that could be in the IFNM.

8(600)
Comment: Draft Goals, Objectives and Alternatives - Wildlife and Wildlife Habitat
Implementation-Level Decisions
Numbers 2 and 3, alternatives should be added to these actions that recognize the rights of ranchers to maintain and protect fencing for safety and segregation of livestock.
Response: BLM will continue to manage livestock grazing within the monument in accordance with the Taylor Grazing Act, which provides for "the orderly use, improvement, and development of the range." BLM recognizes the need for livestock operators to maintain fencing for the safety and management of livestock. All alternatives would be implemented in accordance with laws, regulations, and standard operating procedures and existing rights, as noted in section 4.2.2 of the PRMP.

8(601)
Comment: 2-17 Wildlife and Wildlife Habitat. Objective 6: "Manage activities and uses to protect the following priority species..." Suggest adding 'game species' to the list of priority species for consistency on RMPs statewide.
Response: "Game species" has been added to the list of priority species.

8(602)
Comment: All livestock grazing should be phased out of the Monument and unsightly and unsafe fencelines should be removed.
Response: Alternative B analyzes a phased approach of grazing cessation in the monument. Under all alternatives, livestock grazing practices would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, which establish measurable indicators of rangeland health.

8(SR226)
Summary Comment: Impacts of mechanical, chemical, and biological treatments and the use of non-native species has not been analyzed or discussed in depth.
Summary Response: The analysis of mechanical, chemical, and biological treatments is at a level appropriate for a landscape-level RMP. Additional information and effects of mechanical, chemical, and biological treatments would be considered during site-specific analysis.

8(SR256)
Summary Comment: BLM should protect biological resources, status of vertebrate and invertebrate pollinators, and use trend analysis that address changes to the biotic community and protect the monument until we understand existing conditions before developing a final management plan. The final RMP should include Pans for careful monitoring and trend analysis.
Summary Response: As required by NEPA, BLM has used the information available to provide protection of resources and evaluate the effect of decisions. As required by the Proclamation, the management actions and strategies defined in the RMP were developed to protect wildlife species and their habitats so that "proper care and management of the objects" is ensured. However, information gathered on wildlife in the IFNM is not comprehensive and will continue to be adjusted as new information is obtained and conditions change on the IFNM. As additional information is collected, it will be used to adapt management approaches and provide additional protection, if necessary. BLM will continue to seek partnerships with universities, State and Federal agencies, ranchers, and science-based organizations in designing and implementing inventory and monitoring the IFNM so that protection of

biological resources within the IFNM is ensured. See Section 2.3.5 for additional information on the development of a monitoring plan in the IFNM.

8(SR257)
Summary Comment: We are concerned about the proposal in the draft to rescind the Silver Bell Bighorn Sheep Management Area and replace it with a "wildlife habitat management area" of only 29,920 acres. We want more protection for the bighorn sheep habitat, not less.
Summary Response: Under the proposed alternative (Alternative C), BLM would continue to manage and protect desert bighorn sheep habitat within the IFNM. The change in the acreage for the area managed is a result of studies and topographic analysis performed by researchers at the University of Arizona and AGFD (Bristow et al 1996, Jansen 2006, Jansen 2007), which indicates what areas would be suitable habitat for desert bighorn sheep. In addition, BLM would close localized areas (lambing areas) within the WHA to human entry between January 1 and April 30 (in coordination with AGFD) for protection of the desert bighorn sheep. Therefore, BLM believes the proposed alternative would provide additional protection for the desert bighorn sheep, despite a smaller area being specifically managed for them.

8(SR258)
Summary Comment: It is unclear how BLM proposed to manage habitat and population dynamics for large mammals such as the bighorn sheep. The boundary of the monument is an artificial boundary, and BLM should partner with other landowners such as the Tohono O'odham Nation for habitat connectivity.
Summary Response: Arizona's Wildlife Linkages Workgroup, of which BLM is a member, has been established to identify regional and statewide habitat corridors. These corridors will aid in developing a landscape level, multijurisdictional approach to wildlife corridor conservation and management in the IFNM. Management of these corridors will require close coordination and partnership with adjacent landowners, such as the Tohono O'odham Nation, ASLD, and others.

8(SR259)
Summary Comment: AGFD should manage any and all hunting activities in the IFNM. In addition, the use of lead shot should be banned within the IFNM to better protect migratory birds.
Summary Response: As the Proclamation states, nothing shall be deemed to enlarge or diminish the jurisdiction of the State of Arizona in respect to fish and wildlife management. It is the responsibility of the AGFD to determine game species, enforce hunting regulations, and set standards for ammunition use on the IFNM.

8(SR260)
Summary Comment: Manmade watering sources (for livestock or other reasons) are a source of non-native and feral species spread and can negatively impact wildlife. It is inappropriate to create new wildlife waters until it has been scientifically proven beyond a reasonable doubt that they do not cause harm to wildlife populations, such as serving as centers for the transmission of disease.
Summary Response: These concerns were addressed in a study AGFD conducted from 1999 through 2003 to determine direct and indirect effects of wildlife water developments in southwestern Arizona (Rosenstock et al. 2004). A summary of results include the following:
Water developments were used by an array of wildlife including game and non-game species.
Few observed successful predation event.
No significant evidence of water quality problems associated with water chemistry.
No detection of toxins produced by blue-green algae.
No evidence of a significant role of the protozoan parasite that causes trichomoniasis.
No evidence the wildlife waters provide larval habitat for biting midges (genus Culicoides) that transmit hemorrhagic disease viruses.
Few documented cases of animals drowning.

Based on these results, BLM continues the operation and maintenance of wildlife waters for the benefit of species found on the IFNM. BLM will continue to monitor wildlife waters on the monument to detect specific impacts, including those cited in the comment.

8(SR261)
Summary Comment: BLM has proposed several alternatives that may affect access to current livestock waters, possibly limiting the amount of water available in the IFNM. BLM should provide further information in the impact analysis on how the proposed loss of livestock waters may affect wildlife populations.
Summary Response: The impact analysis in the Proposed RMP/EIS has been revised regarding the potential loss of livestock waters and the affect this could have on wildlife. The revised analysis is "As existing leases expire and are made unavailable to grazing, existing livestock waters would cease to be maintained. Loss of livestock waters would reduce the availability of water for wildlife and could result in degradation of wildlife habitat, altered wildlife movement patterns, increased utilization of remaining wildlife waters, and reduction in wildlife populations. Adverse effects on wildlife directly or indirectly resulting from changes to water developments would be addressed during the Rangeland Health Evaluations conducted at individual allotments."

8(SR263)
Summary Comment: The Draft RMP/EIS did not properly cite Averill-Murray 2002 regarding the number of animal species.
Summary Response: The text in this section has been revised to include the correct reference. The text has been changed to "The ironwood-bursage habitat in the Silver Bell Mountains is associated with more than 674 species, including 64 mammalian and 57 bird species (BLM 2001)."

8(SR264)
Summary Comment: The Averill-Murray and Averill-Murray report, which is the only reference on birds cited in the EIS, is not a credible inventory of birds in the IFNM. The credibility of the Averill-Murray and Averill-Murray 2002 study includes a reference to Phillips and others 1964 regarding Bell's vireos that has not be substantiated by others.
Summary Response: BLM has revised the text in Section 3.1.5.3 to cite Phillips 1964. The text has been revised to "The most characteristic species include turkey vulture (Cathartes aura), northern harrier (Circus cyaneus), Cooper's hawk (Accipiter cooperii), white-winged dove (Zenaida asiatica), elf owl (Micrathene whitneyi), lesser nighthawk (Chordeiles acutipennis), blackchinned hummingbird (Archilochus alexandri), ash-throated flycatcher (Myiarchus cinerascens), purple martin (Progne subis), Bell's vireo (Vireo atricapillus), Lucy's warbler (Vermivora luciae), and sage sparrow (Amphispiza belli). Species such as killdeer (Charadrius vociferous), great blue heron (Ardea herodias), mallard (Anas platyrhynchos), and black-necked stilt (Himantopus mexicanus) may be found where suitable habitat exists (Phillips 1964)."

8(SR265)
Summary Comment: The Draft RMP/ EIS contains significant errors that require attention before an analysis can be done that predicts the level of protection for wildlife. The complexity of wildlife ecology is not sufficiently addressed, and the single-species approach to management is insufficient. Only by managing for the health of the entire interrelated ecosystem can the health of individual species and individuals of a species be ensured.
Summary Response: As required by NEPA, BLM has used the information available to provide protection of resources and evaluate the affect of decisions. The information gathered on wildlife in the IFNM is not comprehensive and will continue to be adjusted as new information is obtained and conditions change on the IFNM. As additional information about wildlife resources, including ecosystem function, is collected from monitoring efforts and other sources, this information will be used to adapt

management approaches, if necessary. Management of wildlife and habitat is part of the comprehensive management of all resource values in the IFNM and is not tied solely to management actions identified in the Wildlife and Wildlife Habitat sections of the RMP. Protection of species and habitat would also be achieved through management of other specific resource values (cultural resources, recreation, vegetation, travel management, visual, etc.).

8(SR267)
Summary Comment: There is evidence of disease transmission between livestock and wildlife, with a notable recent case on the IFNM. The Draft RMP/EIS must consider this impact on monument objects such as desert bighorn sheep. The Draft RMP/EIS admits that bighorn sometimes cross the valley floor between mountain ranges; therefore, all livestock grazing within the IFNM is subject to this adverse effect. Refer to Draft RMP/EIS at page 3-17.
Summary Response: Livestock can transmit disease to wildlife populations, including desert bighorn sheep. However, most disease transmissions occur within a specific family of animals (e.g., goats to bighorn sheep), not between families of animals (e.g., cattle to bighorn sheep). Therefore, not all livestock is subject to that impact. Existing BLM policy stipulates allowable distances between domestic sheep and goats and bighorn sheep (9 miles). Evidence of disease transmission from livestock to desert bighorn sheep on the IFNM suggests the disease transmission was from livestock outside the monument. To mitigate for potential disease transmission from livestock sources outside the monument, existing fences that were constructed prior to the adoption of BLM Handbook H-1741-1 (Fencing) and its supplement (2003) will be modified as wildlife concerns are identified or when fences are reconstructed. New fence construction will be analyzed on a case-by-case basis, and impacts on wildlife movement will be analyzed. Furthermore, The Arizona Standards for Rangeland Health are used in assessing whether grazing is causing habitat degradation for wildlife and other resource values.

8(SR268)
Summary Comment: Section 3.1.5.1 discusses the categories of bighorn sheep habitat and their abilities to support herds. The areas designated under these categories should be displayed on Maps 2-1 and 2-2 to demonstrate what areas are in critical need of closure to human entry.
Summary Response: BLM, in coordination with AGFD, has determined that only lambing areas would need closure to human entry. The location of lambing areas will vary over time. These areas are not based on the desert bighorn sheep habitat categories.

8(SR270)
Summary Comment: Wildlife and Wildlife Habitat Decisions for Management Actions, Allowable Uses, and Use Allocations Number 4 discusses supplemental stockings. This was confusing. As stocking is usually a term applied to fish, and there are no aquatic areas within the monument, SBM suggests removing this term.
Summary Response: Supplemental stocking is a term commonly used to describe the act of introducing individuals of a species to an area from a source outside the existing population in the area. The term is used for both wildlife and fish species.

8(SR271)
Summary Comment: Wildlife and Wildlife Habitat Decisions for Management Actions, Allowable Uses, and Use Allocations In all cases, SBM requests that an Alternative C and D be added that states: “Same as Alternative B but recognizing valid existing rights and operations allowed therein.”
Summary Response: As stated in the Proclamation, BLM recognizes all valid existing rights in the monument. This includes mining claims and other operations.

8(SR273)
Summary Comment: An attempt should have been made to document biotic relationships to include strongly interactive species. See Soule et al, 2003, 2005. The Draft RMP/EIS did not consider population dynamics or ecological relationships, and population mapping and ecosystem dynamics should have been evaluated against a matrix that looks at those dynamics in or with gradients of change. These changes include but are not limited to climate variability, aridity/drought, and non-native and invasive species, among others. Disturbances within the monument and along its boundaries--such as mining, roads, drilling, as well as density and intensity of human recreation and agricultural uses--should be included in such a matrix.
Summary Response: Section 4.3.5 of the Draft RMP/EIS analyzed impacts on wildlife and wildlife habitat for a range of sources including air quality, soil and water, vegetation, fire ecology, visual resources, wilderness characteristics, mining, livestock grazing, recreations, lands and realty, and transportation. The impacts analyzed in the document are appropriate for a programmatic planning document. Additional analysis will be completed when site-specific projects or actions are proposed.

8(SR274)
Summary Comment: The current condition or state of habitats must be assessed by scientific research by qualified specialists who have verified the presence and condition of wildlife habitats and populations in the IFNM. These qualified specialists could then determine if and how such areas should be enhanced or restored.
The BLM should coordinate these efforts through partnership with AGFD, USFWS if appropriate, NRCS and Pima NRCD, as well as the affected grazing permittees, to determine what levels of artificial wildlife introductions are appropriate for each desired plant community.
Summary Response: We agree and have changed the Draft RMP/EIS to reflect this comment. The text in Table 2-5 (Resource Management Alternatives for Wildlife and Wildlife Habitat Alternative B4) was changed to read: "As appropriate, BLM would coordinate the evaluation and implementation of proposals to enhance wildlife populations through partnerships with the AGFD, USFWS, NRCS, Pima County NRCD, and affected grazing permittees, to determine what levels of wildlife introductions or habitat enhancements are appropriate for each desired plant community."

8(SR275)
Summary Comment: Page 2-19, Table 2-5, Management Alternatives for Wildlife, Item 4: "Avoid projects or activities that could disturb priority species or habitats (highlighting added)." The statement means, "Avoid all projects and activities." Any project or activity could disturb priority species or habitats. The statement should be changed to read, "Avoid projects or activities that have been determined likely to harm priority species or habitats."
Summary Response: We agree and have changed the Draft RMP/EIS to reflect this comment. The text in Table 2-5 (Resource Management Alternatives for Wildlife and Wildlife Habitat -Implementation Level Decisions: Alternative B4) was changed to read: "Avoid projects or activities that have been determined likely to harm priority species or habitats."

8(SR280)
Summary Comment: I am concerned that allowing motor vehicles to travel on a network of roads through the Sawtooth Mountains would tend to fragment habitat for animals such as the desert tortoise.
Summary Response: Habitat connectivity for wildlife species was one of many considerations in the route designation process. Studies of the effects of routes on various wildlife species have been conducted, but most focused on paved roads with high traffic volume at high speed. Few studies of this type are applicable to the IFNM. However, not all routes have equal effects on wildlife. The location and availability of food and shelter play greater roles in determining the distribution and preferred use areas of most wildlife species than do route density and abundance. BLM used a route designation process, closing those routes that were redundant, had no specific use or destination, or that were causing

documented impacts to wildlife or other resources. Modifications of travel management in the Sawtooth Mountains area, based on new information and consideration of the effects on wildlife, have been made in the Proposed RMP/EIS and should decrease the threat of habitat fragmentation. BLM believes that essential wildlife habitats and travel corridors would continue to be maintained under the Proposed RMP/EIS.

8(SR281)
Summary Comment: Wildlife within the monument suffers equally from the disturbance both the cumulative and additive types of effects. Past, present, and foreseeable future actions all include impacts from the U.S.-Mexico border situation, and the BLM has a legal and statutory obligation to assess these honestly.
Summary Response: BLM has addressed cumulative impacts from U.S. Border Patrol activities, past disturbance, and reasonably foreseeable actions in Section 4.7.

8(SR282)
Summary Comment: The document should include a reference to Arizona's Linkages Workgroup and subsequent reports to promote consistency, cooperation, and coordination in regard to wildlife corridors and to provide current and future land managers a conduit to valuable information.
Summary Response: We agree and have changed the Proposed RMP/EIS to reflect this comment as follows. "Regional and statewide habitat corridors that connect to the IFNM have been identified by Arizona's Linkages Workgroup (Arizona Wildlife Linkages Workgroup 2006). This includes potential habitat corridors between the IFNM and the Tortolita Mountains (Arizona Wildlife Linkages Workgroup 2006). Future efforts and reports from Arizona's Wildlife Linkages Workgroup could aid in a landscape-level, multijurisdictional approach to wildlife corridor conservation and management in the IFNM."

8(SR288)
Summary Comment: The Draft RMP/EIS improperly cites Averill-Murray 2002 regarding bird species preferring habitat with relatively dense grass cover and washes thick with grass and shrubby vegetation. To begin with, Averill-Murray and Averill-Murray have not even identified all the resident birds of the Silver Bell Mountains (much less the entire IFNM monument) and second, they do not appear to have made that statement in their report.
Summary Response: . BLM has revised Section 3.1.3.2 of the Proposed RMP/EIS to remove this citation from Averill-Murray and Averill-Murray 2002. This section has been revised to "Bird species within the monument use xeroriparian habitat and other areas with dense shrubby vegetation for breeding, foraging, and nesting."

8(SR290)
Summary Comment: The wildlife species referenced in the Draft RMP/EIS in Chapter 3 is not a complete list. There are other bird and wildlife species that have been identified in the monument that should be included. Also, some of the species that are listed as migratory are year-round residents of the IFNM. BLM should protect biological resources, status of vertebrate and invertebrate pollinators, and use trend analyses that address changes to the biotic community and protect the monument until we understand existing conditions before developing a final management plan. The Final RMP should include plans for careful monitoring and trend analysis.
Summary Response: BLM has modified the language in the Proposed RMP/EIS in Section 3.1.5 to acknowledge that bird and wildlife species, in addition to those referenced, also may occur within the IFNM. Additional research and studies may also discover species other than those that were enumerated in the Proclamation to indicate the high diversity of species. Species listed as migratory in the Draft RMP/EIS were based on those species protected by the Migratory Bird Treaty Act.
As required by NEPA, BLM has used the information available to provide protection of resources and evaluate the effects of decisions. As required by the Proclamation, the management actions and strategies

defined in the RMP were developed to protect wildlife species and their habitats so that "proper care and management of the objects" is ensured. However, as noted above, information gathered on wildlife in the IFNM is not comprehensive and will continue to be adjusted as new information is obtained and conditions change on the IFNM. As additional information is collected, it will be used to adapt management approaches and provide additional protection, if necessary. BLM will continue to seek partnerships with universities, State and Federal agencies, ranchers, and science-based organizations in designing and implementing inventory and monitoring of the IFNM so that protection of biological resources within the IFNM is ensured. See Section 2.3.5 for additional information on the development of a monitoring plan in the IFNM.

8(SR291)
Summary Comment: The objective to protect blocks of wildlife habitat and movement corridors is overly broad and there is not enough information provided in the Draft RMP/EIS to evaluate this objective. The word "protect" is not well defined, particularly as there are many small blocks of habitat and potential movement corridors that are already fragmented.
Summary Response: This objective has been omitted, but was merged with Objective 2 to state "Manage and/or conserve areas identified as important for the viability of priority species and bighorn sheep populations, including, but not limited to lambing areas and movement corridors. Within 10 years, enhance habitat conditions in movement corridors so they are conducive to wildlife movement."
The protection of contiguous habitat and movement corridors would be achieved through the management decisions adopted in the RMP, such as the allocation of the Desert Bighorn Sheep WHA.
BLM would review proposed projects on a site-specific basis to evaluate potential impacts on wildlife habitat or movement corridors. Refer also to summary comment and response 8(258) for additional information regarding wildlife habitat linkages.

8(SR292)
Summary Comment: BLM has proposed several alternatives that may affect access to current livestock waters, possibly limiting the amount of water available in the IFNM. BLM should provide further information in the impact analysis on how the proposed loss of livestock waters may affect wildlife populations
Summary Response: The impact analysis in section 4.3.5.3 of the Proposed RMP/Final EIS has been revised regarding the potential loss of livestock waters and the effect this could have on wildlife.

8(SR293)
Summary Comment: The loss of operating cattle ranches poses the threat of habitat fragmentation due to the potential for State and private lands to be sold and converted to uses incompatible with and harmful to the purposes and goals of the IFNM.
Summary Response: Under the proposed alternative (Alternative C), all public lands within 11 allotments are available for livestock grazing. The cumulative affects of habitat fragmentation from the possible development of State and private lands is addressed in Section 4.7.

8(SR294)
Summary Comment: The Draft RMP/EIS should clarify how restrictions on surface-disturbing activities could impact AGFD wildlife administrative activities and projects. These restrictions could be open to interpretation by BLM.
Summary Response: BLM will review on a site-specific basis all proposed actions that could result in surface disturbance and the potential effect it may have on objects of the monument. This review would not alter the management authority of AGFD; however, it could result in modifications of projects if there are potential impacts on monument objects.

8(SR295)
Summary Comment: BLM has agreed to meetings to allow AGFD to use motorized and mechanized equipment off designated routes in suitable locations for purposes including, but not limited to, the following: management law enforcement activities, wildlife water supplementation, collar retrieval, capture and release of wildlife, telemetry, surveys, habitat evaluation, and research activities.
Summary Response: The statement has been added to clarify AGFD's allowable administrative uses with respect to management of wildlife within the IFNM.

8(SR298)
Summary Comment: Competition between livestock and wildlife for resources can stress native species populations in average years, but especially during drought years, when the limited resources are already stretched thinly across the needs of many taxa. The negative impacts of livestock grazing on imperiled (threatened or endangered) species are particularly severe. Livestock grazing is a primary cause of endangerment for at least 667 federally listed species (see Flather 1994, 1998). BLM has a responsibility to help protect imperiled species by removing livestock from important habitat on the monument, and an opportunity to provide quality habitat that may preclude additional species from nearing extinction.
Summary Response: Refer also to summary comment and response 9(359) for additional information regarding habitat management.

8(SR299)
Summary Comment: Appendix F of the Draft RMP states that the reclassification of the two fully ephemeral allotments to perennial status was based on those allotments no longer meeting the criteria for an ephemeral classification. This conclusion, however, is not corroborated by scientific data, and it is unclear whether the BLM considered the impacts of year-round grazing on monument resources, such as wildlife habitat and vegetation.
Summary Response: The range of alternatives in the Draft RMP/EIS for livestock grazing in the IFNM included this possibility in Alternatives C and D. However, in the Proposed Plan, both allotments continue to be classified as ephemeral to allow BLM to collect the necessary data to properly analyze the effects of reclassifying these two allotments as perennial. While the allotments do not meet the criteria for an ephemeral allotment (see Appendix F), reclassification requires that forage capacity be identified, which was not done or analyzed in the Draft RMP/EIS. BLM is conducting additional monitoring to determine what appropriate forage capacity would be if reclassification to perennial were to occur; therefore, the decision to reclassify these allotments is being deferred until BLM can collect the data necessary to support and identify an appropriate forage capacity level and conduct an associated environmental analysis. BLM also is looking into the process by which these allotments were initially classified as ephemeral.

8(SR300)
Summary Comment: In the Draft RMP/EIS, BLM did not analyze the need to maintain waters yearlong or the amount of water withdrawn or evaporated. Wildlife waters should be analyzed relative to their overall impact on the system and the multitude of wildlife and not just a single species.
Summary Response: The Proposed RMP implementation-level Decision 1 in Table 2-5 Resource Management Alternatives for Wildlife and Wildlife Habitat regarding wildlife waters would evaluate and implement proposals in coordination with AGFD. Any new or modified waters would be designed consistent with current standards for wildlife and public safety. Adverse effects on wildlife directly or indirectly resulting in changes in water developments would be addressed during the Rangeland Health Evaluations conducted for individual allotments.

8(SR301)
Summary Comment: The effects of grazing on the cactus ferruginous pygmy-owl are not adequately addressed or managed according to the documented threats listed in the 1997 recovery plan for the species.
Summary Response: Refer also to summary comment and response 9(358) for additional information regarding cactus ferruginous pygmy-owl habitat management.

8(SR302)
Summary Comment: The preservation of habitat for the Sonoran desert tortoise is specifically mentioned in the Presidential Proclamation. Distribution of Sonoran desert tortoise in the IFNM is not limited to rocky outcroppings, and tortoises in the monument have been observed crossing the valley floor and burrowing in washes. This makes them vulnerable to trampling by livestock and increases the need for monitoring forage competition. The Draft RMP/EIS fails to analyze these impacts. On the IFNM, the habitat classifications for the Sonoran desert tortoise reveal that nearly 81,000 acres of monument land contain suitable desert tortoise habitat, some of it very high quality and essential to the maintenance of large, viable populations. (See Draft RMP/EIS page 3-26.) However, no analysis is provided to accurately describe the impacts of livestock operations on habitat nor to compare the various alternatives for authorizing grazing on these habitat classes. The Draft RMP/EIS fails to attribute the appropriate level of significance to the preservation of habitat to prevent the Federal listing of this species.
Summary Response: Desert tortoise habitat and populations within the IFNM are managed in cooperation with the AGFD and the Arizona Interagency Desert Tortoise Team. This includes setting management goals for livestock grazing and route management that are compatible with desert tortoise habitat requirements. By policy, the BLM is directed to ensure planning is consistent with recovery plans and/or management plans for listed species. While there is no recovery plan for the Sonoran desert tortoise, the rangewide management plan outlines a number of threats but does not rank these threats or provide an indication of which threats might be more important in the decline of desert tortoise. The rangewide management plan also indicates that threats from grazing occur where livestock use is excessive. The BLM continues to document use levels and habitat conditions using rangeland health evaluations. Impacts on special status species, include the Sonoran desert tortoise, from livestock grazing are addressed in Section 4.3.6.

8(SR303)
Summary Comment: Livestock grazing has other more direct impacts on wildlife as well. Mortality of owls which have become entangled or impaled on fence lines has been documented. See Avery et al 1978, Anderson 1977, Fitzner 1975.
Summary Response: Most fences that exist on BLM lands are necessary to manage livestock use. Fences would be modified to meet BLM standards where there is an identified problem with wildlife. Prioritization of needed modifications would be in coordination with AGFD. Fences not necessary for the control of livestock could be removed under the provisions in the Draft RMP/EIS . While the BLM would like to see such fence modifications implemented as soon as possible, there are no specific timeframes for compliance discussed in the Draft RMP/EIS.

8(SR304)
Summary Comment: The Draft RMP/EIS states that yearlong water sources will be maintained in all pastures, but that these waters will be located where impacts on priority plant species and habitats will be minimized (see Draft RMP/EIS at page 2 51). The Draft RMP/EIS states that priority plant communities occur on 39,647 acres within the planning area (page 3 15) and yet, the BLM does not analyze a specific withdrawal of these lands from livestock grazing or range developments. The Draft RMP/EIS does not provide a timeline for moving these waters.

Summary Response: Moving livestock waters located in priority plant communities would be analyzed during an allotment evaluation or other implementation-level plans. The RMP is not proposing to exclude priority plant communities from livestock grazing.

8(SR510)
Summary Comment: Due to population pressures and climate change management pressures to the lanscape, subsidies for browse, artifical water sources and non-native plant species should be precluded from expanding. Subsidies should be removed when it's documented that it's changing species composition, behavior, and biotic relationships.
Summary Response: BLM manages the IFNM consistent with Arizona's Standards for Rangeland Health and Guidelines for Grazing Administration, which includes consideration of vegetation composition. BLM continues to monitor all land uses to meet the needs of biological resources while maintaining lands as available for multiple use to the extent allowable based on the Proclamation establishing IFNM. As additional information about wildlife resources (including the impact of management activities) is collected from monitoring efforts, management actions would be adjusted to protect resources consistent with goals and objectives of the IFNM. As noted in Section 2.3.5, adaptive management will be used to address the uncertainties of natural resource management, including population pressures and climate change, to further protect the objects of the monument.

Category 9: Special Status Species

9(575)
Comment: Under the wildlife habitat, there was a statement in there about the original Silverbell Desert Bighorn Sheep Management Area, high acreage.
What's not clear is, is that Alternative A, or is that something else? Because you have one region for the bighorn in Alternative A. You've got another for all three.
Response: Under Alternative A, the Silver Bell Desert Bighorn Sheep Management Area includes 56,000 acres of land designated as Federal, State trust, or private land for desert bighorn sheep habitat; 47,000 acres of this area is BLM-administered land. Under Alternatives B, C, and D, the area managed for desert bighorn sheep would be reduced based on more recent information about the sheep and their use of the IFNM, and only approximately 29,820 acres of BLM-administered land would be managed as the Desert Bighorn Sheep WHA.

9(577)
Comment: 2.3.3 BLM Policy
Interesting that a herd of domestic goats has already been allowed to impact the existing bighorn sheep herd, potentially setting up conditions for their eventual extinction. BLM has until now failed to police the border of the Monument against this sort of trespass. How do they anticipate doing it in the future? There is no discussion of the recent disease outbreak in the bighorn sheep in the Monument caused by an incursion of domesticated goats and the impact on the sheep population and current outlook! Why? This is supposed be a description of existing conditions. BLM does a disservice to the public by not being forthcoming with the facts of this incident. BLM's failure to control the borders of the Monument have demonstrated negligence on the part of the agency in taking care of one of the objects of scientific interest the Monument was established to protect.
Response: Past interactions of domestic livestock with bighorn sheep have affected populations. Current public land regulations limit contact between domestic sheep and goats and existing bighorn populations. The BLM uses the following criteria to prevent interactions between domestic goats and sheep and the desert bighorn sheep: 1) grazing and trailing should be discouraged near native wild sheep ranges; 2) natives and domestics should be spatially separated by buffer strips of 8.4 miles except where topographic features or other barriers minimize contact between the two; 3) domestics should be closely managed and carefully herded where necessary to prevent them from straying into native wild sheep

areas; 4) trailing near or through occupied native wild sheep ranges may be permitted when safeguards can be implemented to prevent physical contact between the two; 5) BLM must conduct on-site use compliance during trailing to ensure safeguards are observed; 6) cooperative efforts should be undertaken to quickly notify the permittee and appropriate agency to remove any stray domestic sheep or goats or wild sheep in areas that would allow contact between domestic and wild sheep; and 7) native wild sheep should only be reintroduced into areas where domestic sheep or goat grazing is not permitted. Specifically, Appendix D Administrative Actions by Resource addresses in the Livestock Grazing section the general issues of enforcement and management actions regarding domestic livestock. Information about specific incidents that are part of ongoing litigation is not discussed in the RMP.

9(578)
Comment: 4.3.6 Impact on Special Status Species 4.3.6.1 Impacts Common to All Alternatives
"Extractive resource uses such as mining development can influence ecosystem function, resilience, and sustainability. Extractive resource uses may result in habitat fragmentation and loss though associated land clearing, road building, and disturbance from traffic, hauling, and maintenance activities. Associated point-source pollution causes heavy-metal and highly acidic water pollution, air pollution, noise, and habitat conversion."
The mining industry is subject to pollution control regulations at the federal, state and local levels. All mining development is restricted in terms of the amount of emissions to both air and water. Heavy-metal and highly acidic water pollution would be considered a violation of federal or state permits and would not occur under normal operating conditions. In is incorrect to surmise that air and water pollution are a foregone conclusion of mining operations.
Response: Federal, State, and local regulations permit a minimum standard of emissions and wastes discharged into the environment. However, this is not zero emissions or zero pollution, and over time there could be environmental impacts associated with mining activities that may include any or all of the impacts regarding pollution of the environment mentioned in Section 4.3.6 of the Draft RMP/EIS. The Proposed RMP/EIS has been amended to read: "Associated point-source pollution may cause over time heavy metal and highly acidic water pollution, air pollution, noise, and habitat conversion."

9(581)
Comment: The lesser long-nosed bat (Leptonycteris curasoae) is a migratory species which forages on the Monument. This species depends upon agave and saguaro for flowers and fruits for food, and the decline of the Sonoran Desert ecosystem may irreparably cause population declines. See US Fish and Wildlife Service 1997. Each of the management actions in the plan should have been analyzed in context of how is would affect and contribute to the recovery of this species.
Response: Section 4.3.6 discusses the impacts as they relate collectively to all special status species and their associated habitats for each action alternative, rather than analyzing the impacts on each individual species. BLM believes this summary format is appropriate because the decisions in the RMP that contribute to habitat preservation or impacts to habitat generally are applicable to all special status species rather than just a specific species; furthermore, the objects of the monument are not limited to the just the listed species, but also the habitats, environments, and conditions that support them. The decisions for management actions associated with special status species in Table 2-6 address the broader context of managing for the recovery of these species. Conservation measures related to special status species are detailed in Appendix E.

9(582)
Comment: The cactus ferruginous pygmy owl (Glaucidium brasilianum cactorum) is specifically mentioned in the Proclamation as wildlife to be protected within the Ironwood Forest National Monument. The BLM failed to show how the management actions would contribute to the recovery of this species. Specifically analyze the management implications of the alternatives to the survival and recovery of this species.

Response: Section 4.3.6 discusses the impacts as they relate collectively to all special status species and their associated habitats for each action alternative, rather than analyzing the impacts on each individual species. BLM believes this summary format is appropriate because the decisions in the RMP that contribute to habitat preservation or impacts to habitat generally are applicable to all special status species rather than just a specific species; furthermore, the objects of the monument are not limited to the just the listed species, but also the habitats, environments, and conditions that support them. The decisions for management actions associated with special status species in Table 2-6 address the broader context of managing for the recovery of these species.

9(583)
Comment: We need to be able to open and maintain more water holes, and manage and curtail varmints and predators...anything that may prey on the bighorn. We need to be able to fly freely and land in all areas of the monument to help manage - tag - remove - and transplant sheep into other areas.
Response: The RMP states that BLM will work in conjunction with AGFD to manage wildlife populations, which would include desert bighorn sheep. The implementation of activities is performed by agency professionals and cross-agency partnerships, and often with the help of qualified volunteers recruited to assist the agencies with these projects.

9(584)
Comment: Biological Monitoring and Adaptive Management Plan
Surface disturbance and disruptive activities, such as OHV use and grazing, can cause loss of habitat, habitat fragmentation, and wildlife displacement. In order to evaluate the impacts on threatened and endangered species, baseline conditions must be determined initially. BA will be dated 2009, not 2007.
Response: Baseline conditions of threatened and endangered species were assessed in the biological survey of the IFNM, which was conducted by the Arizona-Sonora Desert Museum (Dimmitt and Van Devender 2003). A Biological Assessment also was conducted that analyzed these baseline conditions and proposed outcomes in response to the preferred alternative, which is now the proposed alternative (BLM 2009). Regardless of the alternative selected, BLM will establish ongoing monitoring of federally listed (threatened or endangered) species, and adapt management to support protection of those species and their habitats. See Section 2.3.5 for additional information on the development of a monitoring plan in the IFNM.

9(585)
Comment: While there are few rigorous studies of grazing impacts within the Sonoran Desert, documented changes following to the cessation of grazing at Tumamoc Hill, just outside of Tucson, Arizona., indicated that after fifty years of livestock exclusion from this area, composition and density of perennial grasses and shrubs increased. See Blydenstein, et al 1957. The long-term exclusion of livestock from Organ Pipe Cactus National Monument is also considered to be one of the reasons for this area's exceptional beauty and vegetation abundance and diversity.
One of the "objects" recognized by the Proclamation for its importance and impressiveness within the Monument is the saguaro (Carnegiea gigantia). Because of this emphasis, the Bureau should be carefully considering the many documented adverse effects of livestock grazing on this species, which is a listed as one of Arizona's Protected Native Plants.
Response: BLM follows Arizona's Standards for Rangeland Health and Guidelines for Grazing Administration, which minimizes potential damages to saguaro cacti. In addition, baseline biological surveys conducted for the IFNM indicated there was no current adverse effect on saguaro recruitment as a consequence of grazing by cattle (Dimmitt and Van Devender 2003).

9(586)
Comment: We are concerned with items listed in the administrative actions as many go well beyond a simple administrative action and seek to impose additional regulatory burden on permittees, landowners and users in and near the monument. A listing of those actions of concern to SBM include:
Special Status Species
• Continue support of conservation efforts (including monitoring) of species occurring within the monument and designated by other agencies (Pima County, Arizona Department of Agriculture) as rare, sensitive, protected, vulnerable, or other special status, and consider each for addition to the BLM Sensitive Species List.
Response: Administrative actions included in Appendix D Administrative Actions for Resources for Special Status Species do not increase regulatory requirements. BLM will consider protective measures for species that have been designated for protection by another jurisdiction or agency.

9(587)
Comment: The Pygmy Owl should be removed as a special status species as the species information has not been issued in final and the species is being delisted.
Response: The cactus ferruginous pygmy-owl is included in the Draft RMP/EIS as a sensitive species because it is listed by the State of Arizona through AGFD as a wildlife species of special concern in Arizona. It also is included because it is listed as a BLM sensitive species. The BLM, in its administration of the IFNM, is acting in accordance with Arizona regulations and laws and with its own directives.

9(603)
Comment: Nichols turk's head cactus (Echinocactus horizonthalonius var. nicholii), a federally listed species singled out by the Proclamation, occurs in the Waterman Mountains of the IFNM, one of only four places it is known to occur and one of two places it occurs in Arizona. The species is not known to be directly affected by livestock grazing, but may be indirectly impacted by the spread of non-native species and the subsequent changes to the fire regime. The limited discussion of this species in the DRMP/DEIS is insufficient. DRMP/DEIS at 3-25.
Response: According to the Biological Opinion on the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management, the likelihood of wildfire occurring within Nichol's Turk's head cactus habitat is very small (with a fire return interval of 112 years). However, invasive plants such as buffelgrass have encroached upon Nichol's Turk's head cactus habitat in the IFNM and do currently pose a threat to the cactus through increased likelihood of fire. Additional information has been included in the Proposed RMP regarding the effects of fire and non-native species on Nichol's Turk's head cactus in Section 4.3.6.1.

9(706)
Comment: Draft Goals, Objectives, and Alternatives - Special Status Species
"Goal 1: Conserve special status species (including Federally listed species, Arizona's Wildlife of Special Concern, Pima County, BLM Sensitive Species, Arizona Department of Agriculture); where necessary, enhance or restore their habitats."
SBM objects to the inclusion of Pima County on this list. Pima County has no regulatory authority to list species and the species listed in their habitat conservation plans are a compilation of species from the other listings. Further, the Pima County habitat conservation plan, still in draft format, includes species that no longer exist in Pima County. Depending upon which section of the plan is being reviewed, the number and the names of the species are not consistent. SBM also objects to the use of the term "restore" in the objective that indicates conservation of special status species is promoted by the maintenance or restoration of their habitats. "Reclaim" would be better in this sense.
Response: State and local governing entities are granted by the U.S. Constitution the ability to enact and enforce laws not specifically proscribed by the Federal Government, if the given law does not contradict or weaken an existing Federal law. Therefore, Pima County is fully within its rights to grant equal or

greater protective status to the species on its list. This includes those species presently or historically documented in the county. Per regulation, BLM's management of the IFNM will be consistent with Pima County's plans and policies, as well as other relevant jurisdictions, so long as they are consistent with Federal policy and law.
The RMP incorrectly lists the common name for Peromyscus merriami, which is referred to in this comment. The Proposed RMP/Final EIS changed to Merriam's mouse or mesquite mouse to Perognathus merriami.
"Reclaim" is a word typically associated with restoration efforts on areas impacted by mining. "Restore" is a word typically associated with ecological efforts to bring back habitats or ecosystems to near-native condition and function. The glossary has been updated to include a term for "restore." BLM would restore areas to improve conditions for the protection of monument objects or to provide improved habitat for special status species, or priority vegetation species in the future. The term "restore" is used to return an area to baseline conditions. All reclamation efforts are undertaken on a case-by-case basis reflecting what is practically achievable and cost effective.

9(SR10)
Summary Comment: BLM should limit activities that disturb or harm bighorn sheep or the habitat of the species, such as hiking, recreational shooting, and OHV use.
Summary Response: The alternatives provide for multiple uses that would incorporate a specific area, such as the Desert Bighorn Sheep WHA, where management of this species would be the priority over other uses. Lambing areas within the Desert Bighorn Sheep WHA would be closed to human entry from January 1 through April 30 (with limited exceptions), and overnight dispersed non-motorized camping would be restricted to protect resources for the species. In addition, OHV use would be restricted to designated routes, and target shooting would be prohibited within the IFNM. Examples of exceptions to the closure could include ranching operations and access to inholdings, though lambing tends to occur in steep, remote cliff areas, which would not likely be conducive for ranching operations and/or access to inholdings. All new proposed actions would be analyzed for consistency with the WHA. Any action that would be deemed as detrimental to the purpose of preserving the habitat areas would be modified to eliminate the negative effects or denied through the NEPA process.

9(SR350)
Summary Comment: None of the alternatives contemplate mining as an allowable use, nor do they allow for the evaluation of mining within the monument.
Summary Response: Mineral resources are covered in all alternatives in the Draft RMP/EIS in that all valid existing claims are to be administered on a case-by-case basis. The comment is addressed in Table 2-12, which includes the alternatives for energy and mineral resources.

9(SR351)
Summary Comment: In the Draft RMP/EIS, Map 2-4 and 2-5 shows the Ragged Top Vegetation Habitat Management Area (VHA) directly in contact with the mining property. Map 2-5 in Alternative D should be adjusted to provide a buffer zone between active mining and the VHA. Areas with valid existing rights should be excluded from all areas of the VHA. Additionally, the acreages should be adjusted to accurately reflect the land ownership and the actual area being managed under this scenario.
Summary Response: BLM defined the VHA based on vegetation assemblages identified within the IFNM. No buffers are necessary for the management of this area as a result of mining operations adjacent to the VHA. BLM also considered excluding the existing mining claims from the VHA; however, if those claims lapse or are not proven valid, this area could be subject to additional management actions, as noted in Table 2-6. The acreages calculated for the RMP are specific to public land administered by BLM. Any actions pertaining to valid existing rights would have precedence over conflicting management actions associated with the VHAs.

9(SR352)
Summary Comment: The maps of desert tortoise habitat in the Draft RMP/EIS should exclude all but BLM-managed lands and should only include Category I and II tortoise habitat.
Summary Response: Map 3-5 in the Draft RMP/EIS shows the habitat in relation to all land within the IFNM boundaries. The establishment of these habitat categories is according to the habitat needs of the desert tortoise and is independent of ownership; however, areas of private land within the monument are administered by the private owner, not the BLM. For the Proposed RMP, Map 3-5 has been revised to show desert tortoise habitat only for public lands administered by BLM to be consistent with other maps. Category III habitat is included to fully inform readers of the desert tortoise inventory and habitat classes present within IFNM. Criteria for Category III are clearly described in Table 3-5. There are no specific management actions tied to Category III habitat in the RMP.

9(SR353)
Summary Comment: In the Draft RMP/EIS, the acres of desert tortoise habitats in Table 3-5 should be revised to remove mining claims, because mining does not support desert tortoise habitat.
Summary Response: The existing mining claims do contain desert tortoise habitat and maps showing it are appropriate. Existence of desert tortoise habitat would not preclude extraction of minerals on valid mineral deposits, but the assessment of "unnecessary and undue degradation" of surface activities would need to account for sensitive species on the surface of the claim.

9(SR354)
Summary Comment: At the present time, there are no herds of wild horses or burros on the IFNM. Unless the BLM has plans to introduce herds into the IFNM the management objective (Objective 11) in Appendix E is unnecessary and confusing.
Summary Response: Appendix E contains the full list of conservation measures from the Desert Tortoise Rangewide Plan. There are no wild horse or burro ranges within the IFNM; therefore, Objective 11 does not apply to the IFNM. There is no statement in the RMP that burros or horses will be imported into the IFNM. Because the IFNM in not located within a Herd Management Area, any wild horses or burros that wander in would be considered a nuisance and could be immediately removed. A statement has been added to Objective 11 in the Proposed RMP/EIS to clarify that wild horses and burros do not exist within the IFNM.

9(SR355)
Summary Comment: Analysis of special status species in the Draft RMP/EIS is inadequate and biased in Alternative B and fails to mention the effects of habitat improvement.
Summary Response: The analysis of the alternatives is presented in Section 4.3.6 in summary format and includes the expected beneficial and adverse impacts. The benefits mentioned are associated with eliminating or severely reducing the impacts caused by human uses or activities. In most cases, habitat improvement would occur by eliminating or curtailing the human activity that is affecting the habitat.

9(SR356)
Summary Comment: Nichol's Turk's head cactus (Echinocactus horizonthalonius var. nicholii), a federally listed species singled out by the Proclamation, occurs in the Waterman Mountains of the IFNM, one of only four places it is known to occur and one of two places it occurs in Arizona. The species is not known to be directly affected by livestock grazing, but may be indirectly impacted by the spread of non-native species and the subsequent changes to the fire regime. The limited discussion of this species on page 3-25 in the Draft RMP/EIS is insufficient.
Summary Response: Section 3.1.6.1.1 presents information on the Nichol's Turk's head cactus within the IFNM. This section is not meant to provide comprehensive information on the Nichol Turk's head cactus, but instead to provide enough information to understand where and to what extent it exists within the IFNM in order to analyze the potential impacts from management decisions and actions on the cactus.

Impacts on the Nichol's Turk's head cactus are summarized in Section 4.3.6, along with potential impacts on other special status species

9(SR357)
Summary Comment: The lesser-long nosed bat depends upon saguaro flowers and fruits. The recovery of this species depends on the protection of food plants, and the impacts of livestock grazing on the habitat of this species must be specifically evaluated. The Draft RMP/EIS does not adequately analyze impacts from grazing on the lesser long-nosed bat and other special status species.
Summary Response: The biological surveys of IFNM that support the Draft RMP/EIS determined that the density of agave in the IFNM is extremely low, and there was no observed impact from livestock on the limited number of agave (Dimmit and Van Devender 2003). Also, botanical surveys did not find adverse effects on the recruitment of young saguaro into the population in areas where cattle graze (Dimmit and Van Devender 2003). Though cattle grazing remains a potential threat to the welfare of habitat for the lesser long-nosed bat throughout its range where excessive browsing on the flower stalks occurs (by wildlife or livestock), this was not a documented threat in the IFNM.

9(SR358)
Summary Comment: The effects of livestock grazing on the cactus ferruginous pygmy-owl habitat are not adequately addressed in the Draft RMP/EIS according to the documented threats listed in the 1997 recovery plan for the species. Draft recovery plan was 2003, not 1997
Summary Response: In the 2003 recovery plan, grazing is documented as one of the many threats to the habitat of this species, which includes riparian woodlands, desert scrub, and xeroriparian washes. Biological surveys conducted by the Arizona-Sonora Desert Museum documented the baseline biological conditions in the IFNM and did not conclude that there were adverse effects on xeroriparian areas or to saguaro recruitment as a consequence of cattle grazing in the IFNM.
The cactus ferruginous pygmy-owl remains a State-protected species and a BLM sensitive species, making it one of the key special status species within the IFNM. However, it is not presently listed as threatened or endangered under the Endangered Species Act; therefore, BLM would not manage it to the same standard as other federally listed threatened or endangered species.

9(SR359)
Summary Comment: Grazing should be stopped to better protect threatened and endangered species.
Summary Response: Habitat management for the priority species, wildlife, threatened and endangered species, or special status species is specifically considered in the Draft RMP/EIS. BLM complies with the Arizona Standards for Rangeland Land Health and Guidelines for Grazing Administration to effectively manage native habitats so that grazing does not degrade the natural ecosystem. Biological surveys conducted by the Arizona-Sonora Desert Museum that served as a biological baseline for the IFNM did not conclude that there were any significant impacts from grazing on any federally listed threatened or endangered species.

9(SR360)
Summary Comment: The Sonoran desert tortoise was not adequately addressed in impacts among the alternatives of the Draft RMP/EIS.
Summary Response: Section 4.3.6 in the Proposed RMP/EIS has been revised to include potential impacts on the Sonoran desert tortoise and other priority special status species. The impacts on desert tortoise habitat are extensively and specifically analyzed for all alternatives in Sections 4.3.5 (Impacts on Wildlife and Wildlife Habitat) and 4.3.6 (Impacts on Special Status Species).

9(SR361)
Summary Comment: The Draft RMP/EIS does not provide for the preservation of desert tortoise habitat to prevent future possible Federal listing of the species.

Summary Response: Appendix E in the Draft RMP/EIS provides specific conservation measures that would be implemented to protect the population and habitat. These measures follow the Conservation Measures from Desert Tortoise Habitat Management on the Public Lands: A Rangewide Plan.

9(SR362)

Summary Comment: The Draft RMP/EIS should analyze impacts on the Tucson shovel-nosed snake, which is currently in the Endangered Species Act petitioning process and is undergoing serious population and habitat declines. The Draft RMP/EIS should analyze impacts from declines of vegetation communities under various management schemes as impacting the prey base of this species.

Summary Response: Although a listing petition was filed in 2004, the Tucson shovel-nosed snake (Chionactis occipitalis klauberi) does not currently appear on the list of petitioned species or candidate species with the USFWS. However, it is listed as a priority vulnerable species on the Pima County list of species. This species is included in the special status species of this Draft RMP/EIS based on this status, and its management is included within the plan.

Section 4.3.6 discusses the impacts as they relate collectively to all special status species and their associated habitats for each action alternative rather than analyzing the impacts on each individual species. BLM believes this summary format is appropriate because the decisions in the RMP that contribute to habitat preservation or impacts to habitat generally are applicable to the health of all wildlife species and the conditions that support their presence within the monument. Section 3.6 does not present any inconsistencies regarding prey or impacts on habitat for the different alternatives that would be unique to the Tucson shovel-nosed snake that would require a specific focus on the snake itself in the analysis.

Table 2-6 lists the goals and objectives for special status species preservation on the IFNM, which includes the Tucson shovel-nosed snake. One goal of the IFNM is to conserve special status species and, where necessary, enhance or restore their habitats. Objective 1 is to manage land uses to achieve desired conditions within the monument to provide adequate habitat for special status species. Objective 2 is to prevent the avoidable loss of habitat for special status species. Furthermore, Appendix D describes administrative actions that would apply to conservation of all special status species, including the Tucson shovel-nosed snake.

9(SR363)

Summary Comment: In the Draft RMP/EIS, BLM must consider the needs of species on the brink of extinction and recognize its obligation to act towards the recovery of populations, pursuant to the Endangered Species Act, not simply maintain the precarious balance of imperilment.

Summary Response: Protection and recovery measures and procedures are specifically addressed throughout the RMP. The main measure to achieve population recovery is to preserve the habitat of threatened or endangered species and limit unnatural disturbances to that habitat. The habitat of the Nichol's Turk's head cactus is proposed to be set aside in a VHA designation, which would put that species at the forefront of management decisions in that area. The entire IFNM would be designated by the BLM as habitat for the lesser long-nosed bat, which places the needs of preserving habitat for this species as a priority throughout the IFNM (refer to Appendix E for specific conservation measures). Furthermore, Appendix D lists specific administrative actions that would be implemented to protect, preserve, and work toward recovery of local populations of species listed as threatened or endangered.

9(SR364)

Summary Comment: The Draft RMP/EIS does not analyze or admit that Alternative B provides better protection for the valuable habitat in the Sawtooth Mountains for the sensitive desert tortoise than BLM's preferred alternative. It is widely accepted that habitat values are greater in large, unroaded areas or areas with low route densities, yet the BLM did not consider this in its analysis.

Summary Response: Although the Draft RMP/EIS does not address impacts on the Sawtooth Mountains specifically, BLM has revised tables in the Proposed RMP/Final EIS to clarify the difference between

alternatives regarding the miles of motorized routes designated in desert tortoise Category 1, 2, and 3 habitat. Refer also to summary comment and response 9(360) for additional information regarding desert tortoise habitat.

9(SR365)
Summary Comment: The EPA recommends that BLM establish a monitoring and adaptive management plan for threatened and endangered species. Baseline conditions should be determined initially, and a monitoring and adaptive management plan should be established to evaluate and respond to the impacts on resources in the IFNM. A description of the monitoring and adaptive management plan, and funding necessary to implement this plan, should be included in the Final EIS.
Summary Response: Specifics of the implementation would be part of ongoing planning and daily operation procedures based on adaptive management. A description of this is included in Section 2.3.5 of the Proposed RMP/EIS. The Draft RMP/EIS does include monitoring in Appendix D (Administrative Actions by Resource) in the special status species section. Appendix E provides conservation measures for some specific special status species. Refer also to summary comment and response 9(584) for additional information regarding habitat assessments.

9(SR366)
Summary Comment: The current condition or state of habitats must be assessed by scientific research by qualified specialists who have verified the presence and condition of such habitats in the IFNM. These qualified specialists could then determine if and how such areas should be enhanced or restored. Qualified specialists, including grazing permittees, NRCS, and Pima NRCD should be involved in meeting Special Status Species Objective 1.
Summary Response: Qualified specialists from the Arizona Sonora Desert Museum conducted baseline biological surveys for the IFNM in support of this RMP.
Threatened and endangered species recovery efforts, including habitat restoration, require the use of biologists and restoration ecologists who are permitted by the USFWS to perform these tasks. BLM will work with Pima County NRCD, NRCS, and others to enhance or restore habitats to meet this objective.

9(SR367)
Summary Comment: The Draft RMP/EIS includes the management action "Avoid projects or activities that could disturb priority species or habitats. Require mitigation when avoidance is not possible." While addition of new livestock waters, for example, may potentially and temporarily disturb a priority species habitat, it may also enhance the same habitat in the long run through improved distribution and timing of grazing effects, improvement of plant community structure or greater accessibility of priority species to water and other specific necessities. The BLM should take care not to regulate its conservation partners off the land. As we face issues ranging from drought and urbanization to funding cuts, we should keep as many people at the table as possible to preserve the land against future problems.
Summary Response: Although the regulation of Federal endangered and threatened species is determined by the USFWS, BLM intends to establish priority species and habitats through the RMP. BLM analyzes both long and short term impacts of all proposed actions in a site specific NEPA document and decisions regarding where, how and if the project will go forward are based on all the merits of the action. The NEPA process also includes requirements and opportunities for public participation and coordination with all partners concerned with the action. BLM policy emphasizes coordination and cooperation with partners to leverage limited funds, include the perspective of various users, and generate public support, among other reasons.

9(SR368)
Summary Comment: In the Draft RMP/EIS, the last sentence in Table 3-4 is misleading regarding habitat of the crested caracara.

Summary Response: In the Proposed RMP/Final EIS, the last sentence in Table 3-4 regarding the crested caracara has been removed.

9(SR369)
Summary Comment: The last statement in Section 3.1.6.1 regarding the impact of grazing by cattle and wildlife on agave misleads the reader into believing the IFNM is full of agaves, misleads the reader into believing cattle grazing within the IFNM (or anywhere else) is causing the lesser long-nosed bat to go extinct, misleads the reader into believing the lesser long-nose bat is not abundant by the hundreds of thousands within the United States, and fails to inform the reader that the original scientific justification underlying the listing of the species was disputed by more recent studies by Petryzyn.
Summary Response: The biological surveys of IFNM that support the Draft RMP/EIS determined that the density of agave in the IFNM is extremely low, and there was no observed impact from livestock on the limited number of agave (Dimmit and Van Devender 2003). Also, botanical surveys did not find adverse effects on the recruitment of young saguaro into the population in areas where cattle graze (Dimmit and Van Devender 2003). Though cattle grazing remains a potential threat to the welfare of habitat for the lesser long-nosed bat throughout its range where excessive browsing on the flower stalks occurs (by wildlife or livestock), this was not a documented threat in the IFNM.
Cockrum and Petryzyn's 1991 paper is the exception to the overall scientific research findings on the rarity of the species (USFWS 1994). Most recently, the Lesser Long-Nosed Bat 5-Year Review: Summary and Evaluation (USFWS 2007) found the bat population is increasing and recommended the species for downlisting from endangered to threatened.

9(SR370)
Summary Comment: The only confirmed threat to Sonoran desert tortoises at Ragged Top is an upper respiratory disease apparently unrelated to cattle grazing. A University of Arizona study of the disease included the following statement in its abstract: "More recently, a preliminary disease study was conducted during 2001-2002 at desert tortoise study sites in Arizona. While no M. agassizii antibodies were detected in tortoises at three remote sites (Sugarloaf, Florence, and Silver Bell Mountains), 23 out of 43 tortoises in two sites adjacent to Tucson (Saguaro National Park East (SNPE) and Ragged Top Mountain) tested positive for M. agassizii antibodies (Riedle and Averill-Murray 2003)."
Summary Response: The study referenced in the comment looked at the presence and absence of the disease antibodies; there is no assumption from the study that mentions cattle grazing. However, cattle grazing and upper respiratory disease are two of the threats that have jeopardized the existence of this species, as described in the management plan for the Mojave subpopulation of the desert tortoise (Murray and Dickinson 1996). Therefore, the threats should be left in the text as they are mentioned.
In the Proposed RMP/EIS Section 3.1.6.2.1 has been amended to include upper respiratory disease as a threat to the species. Desert tortoises have been exposed to the disease on Ragged Top Mountain as evidenced by the presence of antibodies toward M. agassizii in some of the individuals (Riedle and Averill-Murray 2003).

9(SR371)
Summary Comment: Livestock grazing has profound negative impacts: the intrusion of roads into native habitat, the spread of non-native species, and subsequent effects on the habitat of the desert tortoise. In the Draft RMP/EIS, the preferred alternative keeps many roads open for administrative use, including the maintenance of range developments and ranching activities. Therefore, the indirect effects of livestock grazing on roads and invasive species and on desert tortoise are cumulatively substantial and must be analyzed.
Summary Response: The impacts of the proposed alternative on the desert tortoise, including livestock grazing, designation of routes for motorized use, and the potential for spread of non-native species, are addressed generally under Section 4.3.6. The analysis of the proposed alternative considers the impacts from all decisions on the desert tortoise in aggregate. In contrast, the cumulative impacts section (Section

4.7.2) addresses the incremental affects of BLM management in addition to the other past, present, and reasonably foreseeable actions on the IFNM. Though not specifically mentioned, the impacts described under Section 4.7.2.5 would apply to the desert tortoise.

9(SR372)
Summary Comment: The appropriate partnerships need to be established to monitor habitat health and the effects of grazing, to include professional range managers. Such partnerships should include AGFD, USFWS (if applicable), grazing permittees, NRCS, and Pima NRCD. The long-term impacts of any significant management change--such as changes in livestock AUMs or installation or removal of ranch infrastructure (water and fencing)--should be monitored in a professional manner to determine impacts on vegetation, soils, and wildlife.
Summary Response: The BLM states in the Draft RMP/EIS that partnerships would be pursued for monitoring activities in the IFNM. Depending upon the specific monitoring project, AGFD, USFWS, NRCS, Pima NRCD, and grazing permittees would all be valuable partners in monitoring efforts, and BLM intends to use their expertise for this purpose. See Section 2.3.5 for additional information on the development of a monitoring plan in the IFNM.

9(SR373)
Summary Comment: The Draft RMP/EIS states: "Management of livestock grazing to protect desert tortoise habitat also would provide incidental protection of soil and water resources by providing adequate native forage and cover throughout the year for desert tortoise in grazing allotments that include desert tortoise; this could increase vegetation species diversity, structure, and cover." No study has been performed that indicates desert tortoise forage is currently adequate or inadequate. No scientific evidence indicates the desert tortoise is threatened by lack of forage or any other factor related to livestock grazing. Protection of the desert tortoise habitat may only provide incidental protection of soil and water resources.
Summary Response: BLM has revised the statement referenced in section 4.3.3.2 in the Proposed RMP/EIS to read, "Management of livestock grazing to protect desert tortoise habitat also would provide incidental protection of soil and water resources by allowing only new range improvements that would not conflict with tortoise populations."

9(SR377)
Summary Comment: The Draft RMP/EIS in Section 3.1.6.2 indicates that lesser long-nosed bats "occupy elevations between 3,500 and 5,500 feet," which serve as habitat for the bat, and that these elevations are not grazed by livestock. However, only one bat has been documented one time feeding on one saguaro blossom in IFNM.
Summary Response: Documented evidence supports that the local lesser long-nosed bat population actively uses the IFNM for foraging and for temporary night roosts, although the documented use of the IFNM by the lesser long-nosed bat needs more scientific investigation. The mandates of the Endangered Species Act stipulate that the population and the associated habitat has to be protected and managed to ensure perpetuation of the local population of the species. A population and its associated habitat are not managed based on the results of a single survey. Rather, a comprehensive analysis of habitat, data from current surveys, current and historic records, and other methods are used in determining the suitability of an area to support a protected species listed in the Endangered Species Act. The entire IFNM provides adequate to excellent habitat for the species, and the entire IFNM is managed with the needs of the lesser long-nosed bat in all alternatives.

9(SR378)
Summary Comment: The protection efforts for special status species outlined in Implementation Decision 6 are too stringent because they apply to any of the 61 species, which could hinder management of the IFNM.

Summary Response: BLM identified three priority species habitats in Chapter 2 Table 2-6 Resource Management Alternatives for Special Status Species Habitat Decision 1 in the Draft RMP/EIS. This should not be confused with the 61 species listed in Chapter 3. The alternatives, as written, provide BLM with discretion in evaluating projects and requiring avoidance of special status species and/or special status species habitat. The language of the decision does not prohibit projects nor require that BLM authorize projects; the decision is to guide future on-the-ground decisions in a way to minimize potential impacts on special status species.
The BLM is required under the mandates of the Endangered Species Act to protect and ensure perpetuation of local populations and associated habitats of species that are federally listed as threatened or endangered. These presently include the lesser long-nosed bat and Nichol's Turk's head cactus. BLM is required to consider how activities could affect all special status species and uses the best available information to determine the potential effects. Scientific inquiries on the presence/absence, distribution, and abundance of these species within the IFNM were conducted by experienced biologists from the Arizona Sonora Desert Museum in a supporting biological survey of the monument.

Category 10: Fire Ecology and Management

10(203)
Comment: 2-28 Fire Ecology and Mgmt
Fuels treatment actions should prioritize resource protection per the proclamation and the Antiquities Act. Should fuels become an issue, it means that BLM has failed to control invasive species such as buffel grass.
Response: Under all alternatives, hazardous fuels treatments would meet resource objectives. The first priority of all fire and fuels management related activities is safety.

10(206)
Comment: 4.3.7 Impacts on Fire Ecology and Management 4.3.7.1 Impacts Common to All Alternatives
The following impact should be added to this section: Acquisition of non-Federal mineral estate underlying Federal surface holdings throughout the IFNM for entry under the mining laws could contribute to potential fire impacts by minimizing the acreage that would be cleared of all fuels that could contribute to fire danger.
Response: The acquisition of non-Federal mineral estate in areas underlying Federal surface holdings would be possible only in one localized area within the IFNM (refer to Map 3-7 of the Draft RMP/EIS). Therefore, no measurable change in fire danger would be expected as a result of the changing mineral ownership and subsequent reduced potential for vegetation clearing (because minerals would be withdrawn from entry upon acquisition).

10(209)
Comment: BLM's analysis of Alternative B's impact of Fire Ecology and Management is utterly irrelevant and self-referential, and we assume, a typographical error. Draft RMP/EIS at 4-53.
Response: There are typographical errors in paragraph six of page 4-53. The comparisons should be with Alternative A, not B. These were revised in the Proposed RMP/EIS.

10(211)
Comment: (7) Fire Management. Fire management will be consistent with BLM policy. It may be appropriate to allow natural fires to burn in conformity with a fire management plan, and Wildland Fire Use is to be encouraged in areas where a fire-adapted system exists. Prescribed fires are allowed in conformity with a fire management plan so long as it is consistent with improving or maintaining the area's wilderness character. Considering that little if any of the Ironwood Forest National Monument is adapted to fire, the focus should be on limiting the impacts of unnatural fires that are fueled by non-native species. Minimum impact suppression techniques will be applied.

Response: Neither prescribed fire nor wildland fire use would apply anywhere in the IFNM under any alternative in the Draft RMP/EIS. All fires will be suppressed in the shortest practical time using minimum impact suppression techniques. This is common to all alternatives.

10(212)
Comment: 4.3.7 Impacts on Fire Ecology and Management 4.3.7.3 Alternative B
The following impact should be added to this section: Managing the IFNM as an exclusion are with no utility corridors identified which limits the potential for new rights-of-way to be authorized would contribute to potential fire impacts by not providing fire breaks that could help prevent the spread of wildland fires and limiting accessibility of fire fighting equipment and vehicles.
Response: The impact statement cannot be added since none of the alternatives limit BLM's ability to create fire breaks (fuel treatments) should they become necessary.

10(213)
Comment: What are fire management activities and what is their impact? Are there ways to reduce the impact without requiring roads?
Response: The fire management activities for each alternative are presented in Table 2-8. The impacts of fire management activities are described in Chapter 4. Refer to the subsection of interest in that chapter to find impacts from fire management. If no impact statement regarding fire management activities is found, then no impacts would be anticipated. Minimum impact suppression techniques (included in the wildland fire suppression section of Appendix E of the Draft RMP/EIS) would be employed to suppress fire under all alternatives. Road construction is not necessary or practical in nearly every case of fire suppression for fuel types of the IFNM.

10(214)
Comment: Comment on Page 2-92 Summary comparison of impacts, Fire Ecology, last sentence:
"In addition, managing 11 allotments as perennial livestock grazing could decrease the amount of fine fuels available for ignition."
The plan proposes to decrease the grazing allowed from perennial ephemeral to straight perennial grazing. This would directly allow fine fire fuels to build up unchecked during wet ephemeral seasons. Therefore we disagree with the BLM's statement as quoted above and suspect it is actually a typographical error.
Response: The text has been revised in this section to state: "In comparison with Alternative B, managing nine allotments as perennial livestock grazing could decrease the amount of fine fuels available for ignition." In addition, BLM can authorize temporary nonrenewable livestock grazing permits to utilize ephemeral forage increases.

10(SR468)
Summary Comment: The increased risk of wildfire as a result of the buildup of fine fuels in the absence of grazing could impact air quality.
Summary Response: In the Draft RMP/EIS Chapter 2 Alternatives, see Table 2-7 Resource Management Alternatives for Fire Ecology and Management, decision 4 regarding management in areas where fuel loading is high, use biological, mechanical or chemical treatments to maintain levels of fuels. The risk of wildfire is the same for all alternatives.

Category 11: Cultural Resources

11(196)
Comment: 2-3 Cultural Resources
Objective 1 allocating the Monument's cultural resources to 'use categories' is not appropriate and violates the Antiquities Act. 'Using' cultural resources is not part of Federal cultural resource protection law.

Response: The Archaeological Resources Protection Act (ARPA) of 1979 is another law (besides the Antiquities Act) that allows for scientific research to be conducted on Federal lands that requires the researcher/excavator to obtain a permit for conducting research. BLM's Land Use Planning Handbook allows cultural properties in the planning area to be allocated to one of six uses listed. BLM Manual Section 8110 describes the use categories in greater detail. The BLM policy of allocating cultural resources to use categories does not violate the Antiquities Act, and it facilitates compliance with the National Historic Preservation Act. Uses of sites, including excavation, examination, and even gathering of objects are authorized under the Antiquities Act as long as they meet requirements in the Act.

11(460)
Comment: 2-34 Sites are not "allocated" to tribal use. Traditional tribal uses should be respected, and management of those areas should be consulted on and coordinated with tribes on a government to government level, respecting tribal sovereignty.
Response: BLM will continue to consult with American Indian tribes with respect to cultural sites and traditional uses, as described in the alternatives. Allocation of cultural resource sites to various uses is addressed in Chapter 2 Table 2-8 Resource Management Alternatives for Cultural Resources in Decision 1. Refer also to summary comment and response 11(656) for additional information cultural resource site allocation.

11(653)
Comment: In reviewing the posters I do not see any posters that display the objects of the IFNM, or where they are concentrated within the IFNM. The location of these objects if most important in your consideration of a management plan.
Response: According to Presidential Proclamation 7320, the monument contains "objects of scientific interest throughout its desert environment." Where practical, BLM has mapped these objects, and many of these maps were published with the Draft RMP/EIS (such as desert bighorn sheep habitat, desert tortoise habitat, sensitive and unique vegetation communities, etc.). The locations of some objects, such as archeological resources are not shared with the public due to the sensitivity of these resources. To avoid vandalism, information about the location of archaeological resources is restricted pursuant to Section 304 of the National Historic Preservation Act, Section 9(a) of the Archaeological Resources Protection Act, and Section 39-125 of the Arizona Revised Statutes.

11(654)
Comment: There should be a separate Cultural Resources Management Plan fully funded and developed for Ironwood Forest NM. There should be several staff archaeologists solely devoted to managing the cultural resources of IFNM.
Response: After the RMP is approved, and as funding becomes available, BLM will prepare a cultural resource management plan for IFNM. This administrative action would provide guidance on standard procedures, such as how cultural resource inventories are conducted and how sites are nominated to the National Register of Historic Places, as well as site-specific guidance and strategies for managing cultural resources within the IFNM, in conformance with the decisions made in the approved RMP. The number of archeological staff devoted to the IFNM also depends on available funding. The BLM Tucson Field Office, which oversees management of the IFNM, currently retains two archaeologist positions.

11(655)
Comment: 2-3 to 2-5 Land/Rangeland Health Standards do not address impacts to cultural resources.
Response: The Arizona Standards for Rangeland Health are measurable goals that dictate the desired condition of the biological and physical components and characteristics of rangelands and do not directly address impacts on any resources or resource uses. Where specific objectives must be developed as directed by the Arizona Standards for Rangeland Health, full consideration is given to potential impacts on all resources, including cultural resources, in the development of those objectives. The Arizona

Guidelines for Grazing Administration, which are management practices used to ensure that grazing activities meet standards for rangeland health, ensure that all management actions "consider protection and conservation of known cultural resources, including historical sites, and prehistoric sites and plants of significance to Native American peoples" (Appendix C). As discussed in Section 4.3.8.1, impacts would also be identified and mitigated through the grazing lease process.

11(656)
Comment: 2-32 Allocation of sites, determining that certain sites are most important, violates the proclamation. Who decides what is important BLM Archaeologists The tribes Some Phoenix or D.C. bureaucrat?
Response: Use allocations do not make any determination of relative importance of cultural sites; rather, they are allocated based on their nature and relative preservation value. Also refer to comment and response 11(196).

11(657)
Comment: The document mentions two National Register sites that have been severely damaged since the Monument was established. Where is the discussion of those current conditions and what is the plan for restoration and future protection of those sites?
Response: The comment refers to the Santa Ana de Cuiquiburitac Mission site and the Los Robles Archeological District. Additional information on the damage and condition of these sites has been included in Section 3.1.8.2.

11(659)
Comment: Are there prehistoric trails in the Monument? What is their integrity? If they exist, they could be heavily impacted or even destroyed by inappropriate management decisions. How will this be taken into account? Prehistoric trails are historic properties of great significance and are common across Arizona.
Response: To date, prehistoric trails have been found at four sites in the IFNM. BLM considers potential impacts on these trails as various uses of public land are proposed and authorized. These resources were also taken into account throughout the route designation process and in the development of other management actions and allowable uses proposed in the RMP, such as minimizing disturbance of cultural resources during implementation of land use authorizations.

11(678)
Comment: Wilderness designation will best protect cultural artifacts from our pre-history.
Response: Although there is no designated wilderness within the IFNM, and only Congress can designate wilderness, BLM is committed to protecting cultural resources in all areas regardless of special designations. BLM has no mechanism for recommending areas for wilderness designation to Congress at this time.

11(682)
Comment: The National Trust for Historic Preservation ("National Trust") appreciates the opportunity to comment on the Ironwood Forest National Monument Draft Resource Management Plan and Environmental Impact Statement ("Draft RMP"). ... we believe that the preferred alternative, which the Bureau of Land Management ("BLM") developed to strike a balance between the preservation and use of resources within the National Monument, does not fulfill BLM's obligation to identify and protect historic properties under the National Historic Preservation Act ("NHPA"), 16 U.S.C. §§ 470-470w-6, and the Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. §§ 1701-1784.
Response: BLM has taken into account the effects of the RMP on cultural resources in compliance with the National Historic Preservation Act and considered ways to protect the quality of historical and

archaeological values pursuant to the mandate to manage the public land for sustainable multiple uses defined by FLPMA. Your opinion about the preferred alternative has been noted.
BLM recently sponsored an intensive survey to inventory cultural resources along approximately 80 linear miles of routes where traffic could increase as a result of closing other routes. The survey results were considered in designating routes in IFNM. As part of RMP implementation, and as funding becomes available, BLM will prepare a cultural resource management plan for IFNM, which will define a strategy for additional cultural resource survey, including survey of remaining motorized routes. BLM is consulting with the SHPO and other interested parties about road designations.
An administrative action has been added to Appendix D, cultural resources, indicating that BLM will prepare a cultural resources management plan for the IFNM.

11(684)
Comment: Draft Goals, Objectives, and Alternatives - Cultural Resources
Decisions for Management Actions, Allowable Uses, and Use Allocations Public Use
Number 4 Alternative C includes Historic Sites associated with Silver Bell Mine. Because no maps were included on cultural sites, SBM requests that BLM ensure that the sites involved are all on public lands. A provision should be made to ensure that this does not include the townsite within the mining property.
Response: BLM management of cultural sites associated with Silver Bell Mine would be limited to those sites under the purview of BLM authority and responsibility. The Silver Bell townsite is not located on public land and therefore is not under the purview of BLM.

11(685)
Comment: 3.1.8.2 Extent of and Responses to Threats
"The only approved project that has resulted in an adverse effect on cultural resources in the vicinity of IFNM was a land exchange with ASARCO for expansion of the Silver Bell Mine."
SBM takes strong exception to this statement since land was exchanged for other lands that were deemed of greater significance and value for BLM. The referenced land exchange had an overall net beneficial impact to public lands.
Response: The transfer of cultural resources eligible for the National Register of Historic Places is, by regulatory definition, an "adverse effect." BLM approval of the land exchange implies that overall it resulted in public benefits.

11(691)
Comment: It is generally accepted that in water-stressed environments livestock will congregate in those areas with predictable and consistent source of water. Archaeological research throughout the arid West has repeatedly demonstrated that prehistoric humans were also tethered to predictable water sources. It can therefore be postulated that those water sources conducive to livestock needs are the same water sources utilized by prehistoric populations, and that copious evidence of human activities through all periods of time will be located in direct proximity to areas disturbed by modern livestock activities. Consequently, livestock activities have a much greater potential to adversely affect historic properties than most other ground-disturbing activities.
Response: Concentration of livestock, such as around water sources or feeding stations, does have the potential to damage cultural resources. However, the only predictable water resources within the IFNM were built in modern times by ranchers or government agencies, and they were not present in prehistoric times. Therefore, within the IFNM there is little if any correlation between livestock gathering areas and the presence of high concentrations of cultural resources.

11(692)
Comment: 5 The Draft RMP does state that "[t]here are only meager data regarding the extent to which erosion is threatening the historic integrity of cultural resources within the IFNM" (Draft RMP 3-33). The effect of erosion on cultural resources from grazing is not discussed or considered.

Response: As stated in the Draft RMP/EIS, erosion does threaten cultural resources on the IFNM, but little site-specific data have been gathered to evaluate erosion related impacts. When erosion of cultural resources from livestock grazing (or any other activity) occurs, actions are taken to stop the impacts. Impacts on cultural resources are considered during the standards and guidelines process of evaluating each livestock grazing allotment, and areas where cattle congregate and thus cause increased erosion are specifically evaluated for cultural resources.

11(693)
Comment: In addition to impacts on monument cultural resources in general, there are also grazing impacts that have not been properly addressed under Section 106 of the National Historic Preservation Act (NHPA).6 Section 106 applies to each federal undertaking which may cause effects on properties eligible for or listed in the National Register of Historic Places (National Register).7 The Los Robles Archaeological District, Cocoraque Butte Archaeological District, and Santa Ana Mission Site are all listed on the National Register (Draft RMP 3-32). There are an additional 175 sites that have been recommended as eligible for the National Register (Draft RMP 3-33). Due to the impacts of grazing on cultural resources, Section 106 mandates that the BLM adequately evaluate the effect of livestock grazing within the monument sites that are eligible for or listed in the National Register.
Response: The National Historic Preservation Act is a procedural law requiring Federal agencies to examine their actions. This RMP uses the best available information in assessing impacts on cultural resources, including sites listed or eligible for listing in the National Register of Historic Places. Effects to cultural resource sites brought on by grazing livestock are addressed through the Standards and Guides process. Within each grazing allotment that comes up for renewal (every 10 years) effects to cultural resources are addressed and sometimes depending on the situation mitigative recommendations are added into the allotment evaluation to protect cultural resources from degradation. Impacts from grazing on cultural resources are addressed in Section 4.3.8.

11(728)
Comment: 2-3 Cultural Resources
Per Section 110 of the Nat'l Hist. Preservation Act, BLM must inventory the Monument for historic properties. How does BLM propose to 'manage' the resource if it doesn't even know what's out there? (This last comment pretty much applies to all resources within the Monument.) How can they measure change without a baseline? How do you know if anything has been lost without an inventory?
Response: This RMP complies with the National Historic Preservation Act by using the best available information in assessing impacts on cultural resources. Complete inventories of cultural resources and other resources are not required in order to establish management direction. This plan establishes management actions and strategies for the known cultural resources, and BLM will monitor these resources to measure change and determine whether management should be adapted to provide better protection.

11(729)
Comment: What is 'acceptable change' for a historic property? That there is no adverse effect? Objective 4 suggests that there may well be 'unacceptable changes' to cultural resources, and also that areas accessible by roads and trails are especially at risk. This would seem to violate the Antiquities Act. If the BLM knows this is going to happen now, then it must prevent these problems now. If designating and opening roads and trails will lead to adverse effects to cultural resources as BLM suggests here, then BLM may not designate or open those trails or routes. BLM must clearly demonstrate that any road or trail designated for use will protect or enhance protection for cultural resources, or BLM may not designate or open those roads or trails. BLM will be at serious risk for legal action if it takes any action, such as designating and opening a road or trail that brings harm to any cultural resources or historic properties. By the language in Objective C4 of this document, BLM acknowledges it is aware and cognizant of this problem.

Response: "Limits of acceptable change" represent a planning and management framework used to identify management actions that would prevent unacceptable resource impacts from occurring. An acceptable change for a historic property would either be "no effect," or "no adverse effect." Changes that affect the historical qualities that make cultural resources eligible for the National Register of Historic Places would be unacceptable. Route designation is not a RMP decision, but an implementation-level decision, so BLM can change designations if and when new information becomes available, without needing to complete a plan amendment.
BLM recently conducted an intensive survey to inventory cultural resources along approximately 80 linear miles of routes where traffic could increase as a result of closing other routes. The survey results were considered in designating routes in IFNM. BLM is planning to conduct intensive surveys for cultural resources along the remaining routes designated for motorized use.

11(730)
Comment: This current document is short on specific details and does little to nothing to protect the cultural resources of IFNM. And if you don't protect them, there's nothing left to use or interpret. So identification and protection are the first order of business. Oh, and is the BLM going to fulfill their Section 110 responsibilities and nominate properties to the National Register? This document doesn't even discuss the legislative framework for managing cultural resources (the list in the Appendix doesn't count). What about discoveries? How will those be handled? What about a plan to work and partner with Native American tribes?
Response: The RMP prescribes several different management actions to protect the IFNM's fragile cultural resources, including placing restrictions on visitor access, educating visitors to cultural sites, and requiring Arizona Site Steward training for tour guides, among other prescriptions. Management actions related to other resources (wilderness characteristics, visual, travel management, etc.) also will provide protection to cultural resources. Please also refer to Appendix D, which lists administrative actions that BLM takes with regard to protection and use of cultural resources. In addition, the Proclamation itself provides significant protection to cultural resources. Some of the greatest threats to cultural resources on federally administered lands are land tenure changes and mining-related activities. Land tenure changes allow lands to become private. Federal lands transferred into private ownership lose the protection of Federal historic preservation laws. Mining-related activities can damage cultural resources by surface disturbance at mine locations and from road construction necessary for exploration and development. Neither land tenure changes (except through exchange that furthers the purposes of the IFNM) nor mining (except where claims are determined t be valid) will occur on the monument. Monument designation also provides more opportunities to develop partnerships with private, State, and Federal entities to inventory, conduct research, and protect cultural resources.
Sites eligible for listing in the National Register of Historic Places could be nominated, depending on future budget and staff constraints. Sites eligible for protection under National Historic Preservation Act do not need to be listed in the National Register to receive full protection under the law.
As funding becomes available, BLM will prepare a cultural resource management plan for IFNM, which would define a strategy for future inventory and protection of cultural resources, dealing with discoveries, and working with Indian communities. BLM is already working in partnership with NA Tribes and often and regularly solicits their input.

11(731)
Comment: 4-138 4.7.2.7 Cultural Resources (Cumulative Impacts)
The BLM notes here that disturbance and degradation of cultural resources would be expected to occur over time. If this is true, BLM will be in violation of the Antiquities Act, the National Historic Preservation Act, the presidential proclamation, and a whole host of other statutes, laws, regulations, etc. It means that if this analysis is correct and is based upon the management plan at hand, BLM already anticipates failure and is trying to cover its collective rear end for an anticipated negative outcome that involves adverse effects to historic properties that the BLM is responsible for protecting. This means the

current proposed management plan is inadequate according to BLM's own analysis. BLM must therefore immediately halt this process, go back to the drawing board, and come up with a new management plan that adequately protects the resources that the IFNM was established to protect. Cumulative impacts discussions objective is focused specifically on disclosing to the public (in this document) what some of the detrimental effects COULD be to cultural resources (not necessarily what will be) Also, C. I. takes into account lands that adjoin BLM such as private and state that the BLM has no legal control over nor does the BLM have any control as to what goes on these lands.
Response: The discussion of cumulative effects addresses cultural resources, not only on public land within the IFNM, but also on nonpublic lands inside and in the vicinity of the IFNM. The Proposed RMP/Final EIS disclosed potential impacts to resources that could occur and does protect resources consistent with the Proclamation.

11(735)
Comment: 4.3.8 Impacts on Cultural Resources
"Any actions proposed on public land administered by BLM land would include an evaluation of (1) the potential for the presence of important cultural resources, (2) potential impacts on resources due to the type of project action that may allow for surface disturbance or easier access to the resource, and (3) appropriate mitigating actions to protect those cultural resources, including project avoidance, redesign, and if necessary, data recovery." AND would be reviewed using Federal acts and laws already in place that govern the protection, identification and preservation of all archaeological sites found on Federal lands. Examples of these laws include NHPA particularly section 106, American Religious Freedom Act, etc.
This statement should be amended to add: "except in areas of valid existing rights."
Response: BLM only manages land and resources for which it has authority and responsibility in accordance with applicable laws and regulations. Any valid and existing rights would be recognized as proposed actions and would be reviewed using Federal acts and laws already in place that govern the protection, identification and preservation of all archaeological sites found on Federal lands. Examples of these laws include NHPA (particularly Section 106), American Religious Freedom Act, etc.

11(736)
Comment: 4.3.8 Impacts on Cultural Resources
4.3.8.3 Alternative B
"Acquisition of non-Federal mineral estate underlying Federal surface holding throughout the IFNM could coincidentally protect cultural resources by eliminating ground-disturbing activities associated with exploitation of minerals since Federal minerals in the IFNM are withdrawn from entry under the mining laws."
Ground disturbing activities will not be eliminated in areas of valid existing claims. This sentence should be amended to add: except in areas of valid existing claims.
Response: The discussion applies only to potential benefits of acquisition of rights to the non-Federal mineral estate and not to privately held mineral rights.

11(SR30)
Summary Comment: Sensitive habitat areas need to be posted as "no shooting areas" with regular patrols to enforce the restriction.
Summary Response: The Proposed RMP would prohibit recreational shooting throughout the IFNM, including the Waterman Mountains VHA and the Desert Bighorn Sheep WHA. Implementation-level actions such as posting signage and patrolling the monument would occur, as necessary, upon approval of the Final RMP.

11(SR727)
Summary Comment: Develop a plan for the management of historic properties as part of the RMP process for Ironwood Forest. This plan should establish how and when BLM will identify and evaluate the estimated thousands of unrecorded historic properties within the National Monument and should also establish standards and guidelines to ensure their long-term preservation in light of the expansive growth predicted for the area surrounding Ironwood Forest.
Summary Response: The extent of cultural resource survey within IFNM is comparable to that available for other public lands managed by BLM, and BLM routinely considers potential impacts on cultural resources as various uses of public land are proposed and authorized. As part of RMP implementation, and as funding becomes available, BLM will prepare a cultural resource management plan for IFNM, which will define a strategy for additional cultural resource survey. An administrative action has been added to Appendix D, cultural resources, indicating that BLM will prepare a cultural resources management plan for the IFNM. Refer also to summary comment and response 11(730) for additional information regarding proposed management of cultural resources within the IFNM.

11(SR734)
Summary Comment: The Draft RMPEIS lacks information about prehistoric and historic resources because only an estimated 12 percent of the area has been surveyed. This information may constrain BLM's ability to provide optimal resource preservation except under Alternative B. Perhaps it would be better to make any acreage decisions that could result in surface disturbance provisional until surveys and integrated assessments concerning wildlife protection, land fragmentation issues, and considerations regarding critical but intangible assets such as views and quality of visitor experiences are completed.
Summary Response: There is a limitless amount of information about the resources in the IFNM that could be gathered into the future; thus, BLM must prescribe management for the monument based on what we know now, and adjust that management if new information warrants adjustment. There are a number of ways that BLM can consider and use new information as it moves forward with management of the IFNM. First, the IFNM will be managed based on the principles of adaptive management, which allow BLM to adjust future management actions according to monitoring results, discoveries, or other types of new information that may become available. BLM can also amend the RMP if significant new information comes forward that would warrant a change in management as currently proposed. BLM also considers potential impacts on cultural resources as various uses of public land are proposed and authorized. Cultural inventories would be required for any proposed projects that have the potential to affect cultural resources, which would yield additional information. For example, BLM recently conducted additional surveys to inventory cultural resources along approximately 125 miles of routes in the IFNM. The survey results were considered in reexamining routes in IFNM, and some changes have been made to the route designations as a result. All routes designated for motorized use under the proposed alternative have been surveyed. Cultural resource protection was considered under each alternative where traffic could increase on motorized routes as a result of designating other routes for non-motorized use. After the RMP is approved, and as funding becomes available, BLM will also prepare a cultural resource management plan for IFNM, which will define a strategy for additional cultural resource surveys.

11(SR737)
Summary Comment: The BLM must complete the National Historic Preservation Act Section 106 process for proposed road designations prior to issuing a record of decision for the Ironwood Forest RMP. Designating roads in a land use plan is not the type of "broad, plan-level decision" for which BLM may defer the requirements of Section 106. To minimize the risk to historic properties associated with motorized use, BLM must recognize road designation as an undertaking that falls under the jurisdiction of the National Historic Preservation Act and comply with Section 106 prior to designation.
Summary Response: In compliance with IM 2007-030, BLM recently conducted additional surveys to inventory cultural resources along approximately 125 miles of routes that would be designated for

motorized use under the Proposed RMP. The surveys were considered in designating routes in IFNM, and several designations changed as a result of the information in the surveys. Special consideration was given to routes where it was determined that traffic may increase as a result of other route closures. Section 3.1.8.1 of the Draft RMP/EIS has been revised to include the results of these surveys. BLM is consulting with the SHPO and other interested parties about road designations.

11(SR738)
Summary Comment: Develop a plan for the management of historic properties as part of the RMP process for Ironwood Forest. This plan should establish how and when BLM will identify and evaluate the estimated thousands of unrecorded historic properties within the national monument and also should establish standards and guidelines to ensure their long-term preservation in light of the expansive growth predicted for the area surrounding the IFNM
Summary Response: As funding becomes available, BLM will prepare a cultural resource management plan for IFNM that will define a strategy for additional cultural resource survey. An administrative action has been added to Appendix D, cultural resources, indicating that BLM will prepare a cultural resources management plan for the IFNM.

11(SR739)
Summary Comment: Operating ranches are a cultural resource and keeping ranches operating in IFNM is the only way to truly preserve this vanishing cultural resource. The term cultural resource and what constitutes a cultural resource has a very specific definition. A person can look up the definition by going to the BLM Cultural Resources manual series 8100 for the State of Arizona.
Summary Response: The social values of ranching are acknowledged in Section 3.5.2.2.3. No traditional cultural resources related to ranchers and their unique subculture of American society have been inventoried, but future cultural resource inventory could investigate such resources and evaluate their eligibility for the National Register of Historic Places. The ranching subculture would be considered as part of the historical context of any resources related to ranching that may be evaluated in the future.

11(SR809)
Summary Comment: There is a sparse amount of data on the subject of grazing impacts on cultural resources in general; however, there have been documented impacts specifically within arid regions of the United States.
Summary Response: Many factors can influence the extent of grazing impacts on cultural resources, but in general, impacts from dispersed grazing are not well documented and seem to be relatively benign. Concentration of livestock, such as around water sources or feeding stations, has the most potential to damage cultural resources. As discussed in Section 4.3.8.1, impacts would be identified and mitigated through the grazing lease process on a case-by-case basis. When livestock grazing (or any other activity) is determined to impact cultural resources, actions are taken to stop the impacts. Impacts on cultural resources also are considered during the standards and guidelines process of evaluating each livestock grazing allotment.

Category 12: Paleontological Resources

12(133)
Comment: 4.3.9 Impacts on Paleontological Resources 4.3.9.3 Alternative B
In addition, managing 125,110 acres as VRM Class I and 60,000 acres for semi-primitive non-motorized recreation and 36,990 acres for wilderness characteristics would provide coincidental protection to paleontological resources by restricting surface-disturbing activities in those areas.
This statement should be amended to add: “excepting in areas of valid existing rights.”
Response: The text of Section 4.3.9.3 has been revised to mention valid existing rights.

Category 13: Visual Resources

13(198)
Comment: Draft Goals, Objectives, and Alternatives - Scenic and Visual Resources
"Objective 1: Maintain or enhance opportunities to view those landscapes of the monument that may be valued for scenic, cultural, biological, recreation, -or other reasons. Preserve the visual quality of those landscapes visible from important viewing areas, which may include:
• Specific scenic road corridors
• Recreational sites and areas (perhaps as characterized by Recreational Management Zones [RMZ's])
• Designated motorized and non-motorized trails
• Cultural and historic areas
• Residences in and near the monument
• Other sites/areas with identified place-based values
• Primitive areas/wilderness characteristic zones"
SBM requests the inclusion of the phrase "while preserving and protecting historic and ongoing cultural, biological or recreational uses and uses allowed under valid existing rights." The objective should expressly recognize that disturbances are, in many cases, a major component of the archeological and cultural resources protected by the monument and certain activities are ongoing (e.g., ranching, mining, certain tribal uses). These activities cannot be considered "inconsistent" with the purposes of the monument and hence cannot be considered to detract from the "visual quality" of the landscape, which must be read to include the archeological and cultural resources underlying the monument's designation.
Response: Though mining and ranching have occurred since the 1800s, these uses are not considered historic or cultural resources that warrant protective management within the IFNM. These uses are not inconsistent with the management of the IFNM, where valid existing rights occur for mining and where grazing is conducted consistent with Arizona Standards for Rangeland Health and Grazing Administration.

13(199)
Comment: I believe more acreage should be included in the VRM III and IV classes with the caveat that such designations could be upgraded based on proposed projects. Such designation would allow for a more detailed site review when a project is proposed thus offering a truer estimate of project impact on visuals.
Response: As described in BLM Handbook H-1601-1, BLM uses the land use planning process to designate VRM classes for public lands based on an inventory of the visual resources present (scenic quality, viewing distance, visual sensitivity, and related factors) A visual resource inventory was conducted for the IFNM in 2004 related to this RMP planning effort. VRM classes establish visual quality objectives for public lands, and future land use proposals are evaluated to make sure their visual impacts are within those objectives. The visual quality objectives establish thresholds for visual contrast that must be met by proposed management activities, as well as the threshold changes according to VRM class. If a proposed activity does not meet the visual quality objectives, then redesign or mitigation requirements are applied to bring the project within visual quality objectives; the VRM class is not changed. After the Record of Decision is signed for the RMP, VRM designations cannot be changed (upgraded or downgraded) as a result of a detailed site review for a proposed project, unless a RMP amendment process has been completed. Typically the VRM classes III and IV are applied to areas where the changes to the landscape are expected overtime.

13(200)
Comment: 2-38 Scenic and Visual Resources
What is an important viewing area or key observation point? Who decides?
Response: Important viewing areas, or key observation points, are selected from one or a series of points on a travel route or at a use area or a potential use area, where the view of a management activity would

be most revealing. It is BLM's responsibility to manage the scenic resources of the public lands as directed in FLPMA: "...public lands will be managed in a manner which will protect the quality of the scenic (visual) values of these lands."

13(204)
Comment: There is no discussion/analysis of night sky/light pollution issues.
Response: Dark sky values were identified during public information meetings following establishment of the monument. However, BLM has not provided an analysis of night sky or light pollution issues in the EIS because no developed facilities with lighting are proposed for the IFNM as part of the RMP, and based on management actions, no impacts on the night sky are anticipated. The darkness of night skies in the planning area is influenced by light emissions reflected or refracted by the atmosphere originating in population centers in the surrounding landscape, primarily Tucson.

13(205)
Comment: ARPA feels Visual Resource Management restrictions are onerous and subjective and clearly convey implications that mining activities will be severely limited both inside and outside the IFNM. If "viewshed," with its breadth of possible interpretation, is allowed to determine legitimate use inside the management area ARPA would stand squarely against that proposition. But, it is even more egregious to contemplate the visibility of projects on the outside or the management area as tolerable based on what the IFNM dictates. The Monument was not created to serve as the viewing platform for additional expanses of land. Likewise, these restrictions do not represent a realistic approach to managing resource development nor do they reflect current mining practices.
Response: As described in BLM Handbook H-1601-1, BLM uses the land use planning process to designate VRM classes for public lands based on an inventory of the visual resources present and management considerations for other uses. Those management considerations have been reflected in the alternatives in certain areas where BLM has proposed to designate VRM classes that could be more or less restrictive. The purpose of the VRM classes is to manage the visual quality of the public lands and to preserve their character by controlling the visual contrast of on those lands, including BLM management activities. The VRM class for lands with existing mining claims, if determined to be valid, will be modified to VRM Class IV under the monument's adaptive management strategy to allow alteration of the landscape in those areas. The VRM class for adjacent lands will remain unchanged. If claims are not found to be valid, no change in the boundaries would be made.
The landscape surrounding the monument is important to the views from the monument because it is part of the overall scenery. The visual impact of management activities on BLM lands will be a factor when future projects on BLM lands are proposed, and it may be reason for mitigation of impacts. This would not be the case relative to the visual impacts of projects on non-BLM lands, simply because VRM designations apply only to public land administered by the BLM and do not affect non-Federal lands within or near the monument boundary.

13(207)
Comment: SBM has several concerns with items listed in the administrative actions as many go well beyond a simple administrative action and seek to impose additional regulatory burden on permittees, landowners and users in and near the monument. Additionally, the proclamation specifically does not reserve water rights, however several of the administrative actions seek to do just that.
A listing of those actions of concern to SBM include:
Scenic and Visual Resources
• Coordinate with adjacent jurisdictions and planning authorities to manage visual resources consistently on lands adjacent to the monument lands.
Response: The administrative action to coordinate with adjacent planning authorities to manage visual resources consistently on lands adjacent to the IFNM does not impose additional regulatory requirements

on landowners and users near the monument. The intent of this action by BLM is to reduce conflicts among the various users of the IFNM and nearby lands.

13(208)
Comment: Draft Goals, Objectives, and Alternatives - Scenic and Visual Resources
"Goal 1: Preserve the monument's natural scenic and visual values, and where appropriate, rehabilitate disturbed areas that impact important views."
Views of the monument may be protected and preserved by other management goals in the RMP. Views from the monument onto private land are outside the jurisdiction of the monument. Rehabilitation of disturbed areas outside the monument but within a certain viewshed in the monument is beyond the reach of the proclamation.
Response: The goals and objectives in the RMP apply only to the management of public lands administered by the BLM within the IFNM boundary. The only instance with a monument nexus involving lands outside the monument are where management activities on BLM lands outside the monument may have an impact on views from the monument. Those potential visual impacts will be a factor considered in the NEPA review of those proposed activities and may result in appropriate mitigation requirements.

13(210)
Comment: Fence along designated routes, as necessary, to prevent damage to sensitive and unique vegetation and minimize the spread of invasive species and noxious weeds. Fencing creates a non-natural visual impairment.
Response: Though fencing may be noticeable in foreground views, BLM will install fencing compliant with BLM Handbook H-1741 (Fencing), and site-specific analyses will be completed for specific projects, as appropriate, to ensure visual impacts are consistent with VRM objectives.

13(SR35)
Summary Comment: Current mining operations and future operations on valid existing claims will have an effect on viewsheds from many areas of the IFNM. As mining continues to alter the landscape, a VRM Class I or II designation in these areas is inappropriate. Alternatives B, C, and D should be revised to include Class III or IV management areas where there are views of mines.
Summary Response: BLM's management of public lands, including those in the IFNM, is guided by FLPMA, which requires that "management be on the basis of multiple use and sustained yield." FLPMA also requires that "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... and that will provide for outdoor recreation and human occupancy and use." BLM's management of the IFNM is also guided by Presidential Proclamation 7320, "pursuant to applicable legal authorities, to implement the purposes of this proclamation." The Proclamation refers to the monument's "quintessential view of the Sonoran Desert," alluding to vegetation, geological, topographical, and biological characteristics of the area. A "quintessential view" by definition means a perfect example of the object viewed, in this case the natural landscape of the IFNM. The language in the Proclamation specifically refers to the monument's landscape and characteristics, which by definition are visual resources. Under these authorities and in coordination with the public, BLM developed the objectives for management of visual resources.
The RMP does not authorize any ground-disturbing activities or actions; subsequent decisions that are consistent with the goals, objectives, and decisions in the RMP would typically require site-specific analyses on a case-by-case basis to determine their impacts on natural and/or cultural resources.

13(SR104)
Summary Comment: The RMP should clarify how VRM classes were determined and to which lands they apply. VRM classes appropriate for the existing impacts on scenic and visual resources should be used in

areas where visual resources are outside of BLM jurisdiction as is the case with private inholdings and lands outside the monument boundary.
Summary Response: BLM conducted a detailed inventory of the visual resources within the IFNM in 2004 in support of the RMP planning effort. Based on that inventory, much of the public land was identified as Inventory Class II or III, based on existing conditions (refer to Map 3-6). However, as described in BLM Handbook H-1601-1, BLM uses the land use planning process to designate VRM classes for public lands based on an inventory of the visual resources present and management considerations for other uses. Those management considerations have been reflected in the alternatives where in certain areas BLM has proposed to designate VRM classes that would be more or less restrictive based on what future activities would be allowable. VRM designations apply only to public land administered by the BLM (Draft RMP/EIS see Section 1.2, all Chapter 2 maps, including the VRM maps, and in the VRM acreages under each alternative) and would not affect non-Federal lands within or near the monument boundary.

13(SR216)
Summary Comment: What authority does BLM have to manage for scenic vistas and visual resources and to what extent will providing these opportunities affect other resource values?
Summary Response: BLM's management of public lands, including those in the IFNM, is guided by FLPMA, which requires that "management be on the basis of multiple use and sustained yield." FLPMA also requires that "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... and that will provide for outdoor recreation and human occupancy and use." BLM's management of the IFNM is also guided by Presidential Proclamation 7320, "pursuant to applicable legal authorities, to implement the purposes of this proclamation." The Proclamation refers to the monument's "quintessential view of the Sonoran Desert," alluding to vegetation, geological, topographical and biological characteristics of the area. A "quintessential view" by definition means a perfect example of the object viewed, in this case the natural landscape of the IFNM. The language in the Proclamation specifically refers to the monument's landscape and characteristics, which by definition are visual resources. Under these authorities and in coordination with the public, BLM developed the objectives for management of visual resources.
The RMP does not authorize any ground-disturbing activities or actions; subsequent decisions that are consistent with the goals, objectives, and decisions in the RMP would typically require site-specific analyses on a case-by-case basis to determine their impacts on natural and/or cultural resources and if needed project design practices to ensure visual impacts are within VRM class objectives.

Category 14: Wilderness Characteristics

14(114)
Comment: 2.2.1 Wilderness
"BLM has the authority under FLPMA Section 201 to inventory public land resources and other values, including characteristics associated with the concept of wilderness identified as naturalness, solitude, and primitive, unconfined recreation. Wilderness characteristics may be considered in land use planning when the BLM determines that those characteristics are reasonably present, of sufficient value (condition, uniqueness, relevance, importance) and need (trend, risk), and are practical to manage (USDI, BLM 2003c)."
SBM does not contest the fact that BLM has authority to inventory public lands for wilderness characteristics, however managing the land for wilderness characteristics appears to overstep the authority BLM has been given. In addition, the subjective values of condition, uniqueness, relevance and importance can clearly be called into question given the areas that have been given the designation include valid mining claims and back right up to an active mining site. The practicality of management of the land for this designation is also questionable due to the proximity to Silver Bell mine.

Response: Section 302 of FLPMA states that BLM "shall manage the public lands under principles of multiple use." Section 201 of FLPMA directs the Secretary of the Interior to "maintain on a continuing basis an inventory of all public lands and their resource and other values." These passages clearly give BLM the authority to inventory and manage for wilderness characteristics. Handbook H-1601-1 (Land Use Planning Handbook) provides the guidance for the consideration of wilderness characteristics in the land use planning process, and specifically directs BLM to "identify decisions to protect or preserve wilderness characteristics." In the IFNM, BLM is proposing to manage 9,510 acres that exhibit the highest quality wilderness characteristics. It should be noted that wilderness areas can abut industrial, commercial, or residential areas.

14(115)
Comment: Resource Management Alternatives for Lands Managed to Maintain Wilderness Characteristics
In general SBM objects to the addition of Wilderness as a management element. This element is based on one presentation by the Wilderness Coalition. Nowhere in Federal regulations is there a provision to manage as wilderness, areas that do not meet the criteria for wilderness nor is there any reference in the proclamation. More debate is needed before a new management plan is proposed for certain areas.
Response: As discussed in section 3.1.11 of the PRMP, BLM conducted its own inventory of lands with wilderness characteristics in the IFNM, which confirmed wilderness characteristics in the areas identified by the Arizona Wilderness Coalition and identified additional areas that were not identified by the Coalition. BLM is proposing to manage 9,510 acres that exhibit the highest quality wilderness characteristics. Please see the response to comment 14(114) above for discussion regarding the authority of BLM to manage lands for wilderness characteristics.

14(617)
Comment: The BLM should actively pursue wilderness designation for those areas [listed] in Alternative B.
Response: Pursuing wilderness designation is beyond the scope of this RMP effort. Only Congress can designate wilderness areas under the Wilderness Act of 1964. At this time, BLM has no intent or legal mechanism for recommending to Congress areas where wilderness characteristics would be maintained for preservation as wilderness. BLM has submitted wilderness suitability recommendations to Congress pursuant to Section 603 of FLPMA by October 21, 1993. BLM provides information to Congress when designation is considered.

14(622)
Comment: Recommendation: The BLM should reassess its decisions to not protect all of the areas identified as possessing wilderness characteristics. Wilderness is a disappearing resource and the agencies should strive to preserve all that remains on public lands. A reassessment and protection of more lands with wilderness characteristics would also be consistent with current law and guidance, as discussed above.
Response: As noted in Section 3.1.11 of the Final EIS, BLM completed a wilderness characteristics assessment to determine if wilderness characteristics are present within the IFNM. The assessment utilized data gathered for the Draft RMP/EIS in the visual, recreation, vegetation, ecological site, and wildlife habitat resource inventories.
The wilderness characteristics assessment confirmed the presence of lands with wilderness characteristics on approximately 36,990 acres of BLM-administered land, including areas of the Sawtooth, West Silver Bell, Silver Bell, and Roskruge Mountains.
Section 4.3.11 of the Proposed RMP/EIS describes that BLM considers a full range of alternatives from managing no acres to all 36,900 acres of the land to protect wilderness characteristics. Alternative C falls between these acreages, with a plan to manage 9,510 acres to protect wilderness characteristics.

The comment that BLM should reassess its decision to not protect all 36,990 acres identified as possessing wilderness characteristics is noted. The decision must be weighed against the tradeoff with other uses and resource effects. As noted in Section 4.3.11.5, even for the lands not specifically managed for wilderness characteristics, the values of naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation would be present, and other management actions in the RMP would allow these values to be maintained.

14(646)

Comment: Specific Guidance on lands with wilderness characteristics:

(1) Land Disposals, Rights-of-Ways (ROWs), and Use Authorizations. Lands managed for wilderness characteristics will be retained in public ownership (also required as per the Monument Proclamation). They will not be disposed through any means, including public sales, exchanges, patents under the Recreation and Public Purposes Act, State selections or other actions (except where a vested right was established prior to October 21, 1976).

Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These also could be renewed if they are still being used for their authorized purpose. The BLM will acquire State and private inholdings when practicable. In unique situations and subject to public review, exchanges may be made involving Federal and non-Federal lands when such action would significantly benefit that area's wilderness characteristics. New authorizations, leases, permits, and ROWs will not be authorized.

(2) Locatable Minerals. Existing and new mining operations will be regulated using the 43 CFR 3809 regulations to prevent unnecessary and undue degradation of the lands. No new claims as per the Monument Proclamation.

(3) Leasable Minerals. Existing mineral leases represent a valid existing right. These rights are dependent upon the specific terms and conditions of each lease. Existing leases will be regulated to prevent unnecessary or undue degradation. No new leases will be issued as per the Monument Proclamation.

(4) Grazing. Adjustments in the numbers and kind of livestock permitted to graze would be made as a result of revisions in the land use plan. Consideration is given to range condition and the protection of the range resource from deterioration. The construction of new grazing facilities would be permitted if they are primarily for the purpose of protecting wilderness characteristics and more effective management of resources, rather than to accommodate increased numbers of livestock.

(5) Fire Management. Fire management will be consistent with BLM policy. It may be appropriate to allow natural fires to burn in conformity with a fire management plan, and Wildland Fire Use is to be encouraged in areas where a fire-adapted system exists. Prescribed fires are allowed in conformity with a fire management plan so long as it is consistent with improving or maintaining the area's wilderness character. Considering that little if any of the Ironwood Forest National Monument is adapted to fire, the focus should be on limiting the impacts of unnatural fires that are fueled by non-native species. Minimum impact suppression techniques will be applied.

(6) Forest/Vegetation Health. Insects, disease, and invasive species may be controlled if it is determined that it is necessary to meet the minimum requirements to administer and protect these lands. Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the land with wilderness characteristics, or in special instances when the loss to resources may cause adverse impacts to wilderness characteristics. Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness characteristics.

(7) Recreation. Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, rafting, canoeing, and trapping are allowed on these lands. Recreational uses will not be allowed if they require:

o Motor vehicles or mechanical transport (e.g., mountain bikes) off roads designated as open or limited through the route designation process; and

o Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping).
New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under its terms and conditions to their expiration date.
(8) Cultural and Paleontological Resources. Cultural and paleontological resources are recognized as unique and valuable. They are also important supplemental values to an area's wilderness characteristics. Resource inventories, studies, and research involving surface examination may be permitted if it benefits wilderness values. This same standard applies for the salvage of archeological and paleontological sites. Rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavations; and extensive surface collection may also be permitted if they maintain the area's wilderness character. Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness.
(9) Wildlife Management. Fish and wildlife resources are a special feature that contributes to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character. As per the Monument Proclamation, nothing will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting and trapping are allowable activities on these lands. The State establishes regulations and enforcement for these uses. Stocking of wildlife and fish species native to the area may be permitted. Introduction of threatened, endangered, or other special-status species native to North America may be allowed. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle of doing the minimum necessary to manage the area to preserve its natural character.
Response: The Draft RMP/EIS identified direct as well as indirect but complementary management actions for lands managed to protect wilderness characteristics (see management decisions for Lands Managed to Maintain Wilderness Characteristics, Recreation, Travel Management, and Visual Resource Management) that would have a very similar, if not identical, effect on wilderness characteristics as the prescriptions recommended. For example, motorized vehicles are not permitted in these areas per management prescriptions found in the Travel Management section (Table 2-16), and no facilities would be allowed within areas managed to protect wilderness characteristics according to the management objectives for Primitive RMZs found in the Recreation section (Table 2-14). Other sections also contain management actions that complement the objective of protecting wilderness characteristics.

14(773)
Comment: Thus the Ironwood Forest National Monument RMP should acknowledge the wilderness characteristics of the areas included in this proposal and manage these areas to protect their wilderness characteristics.
Response: The goals and objectives, and related allocations in the RMP are consistent with the commenter's suggestions. The allocations in the RMP will effectively protect those values where they exist.

14(SR51)
Summary Comment: There is no explanation in the Draft RMP/EIS about why BLM would choose to manage only about 9,500 acres to maintain wilderness characteristics, when BLM confirmed wilderness characteristics are present on 36,990 acres. The entire 36,990 acres should be managed to maintain wilderness characteristics, which would help ensure protection of monument resources.
Summary Response: BLM identified 36,990 acres on IFNM as having one or more of the wilderness characteristics of naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation. IFNM is proposing to manage 9,510 acres that have characteristics of the highest quality.

Due to the size and configuration of the lands identified with wilderness characteristics, some of these values are found but are of marginal quality in certain areas. Section 3.1.11 in the Proposed RMP/EIS has been revised to provide further details on the results of BLM's assessment of lands with wilderness characteristics in the IFNM.
Management of lands to protect wilderness characteristics is part of the comprehensive management of all resource values in the IFNM, and is not the only strategy for protecting monument resources. Protection of resources in areas not identified for maintaining wilderness characteristics under the proposed alternative would be achieved through management of other specific resources (cultural resources, wildlife habitat, vegetation, recreation, visual, etc.). In the Proposed Plan, for example, 124,900 acres of the IFNM are managed in VRM Class II to protect their natural appearance and thus would have the effect of preserving the naturalness of these lands. This includes all lands that were identified as having the characteristic of naturalness in the BLM wilderness characteristics inventory.

14(SR116)
Summary Comment: It seems inconsistent to manage areas for wilderness characteristics in close proximity to routes designated for motorized travel, active mining operations, or other developed uses. How can someone experience opportunities for solitude where "the sights, sounds and evidence of human activities are rare or infrequent and where visitors can be isolated, alone, or secluded from others," in such close proximity to such noise-generating activities.
Summary Response: Although 36,990 acres have been identified as having some level of wilderness characteristics to meet wilderness management criteria, BLM is proposing to manage 9,510 acres that exhibit the highest quality wilderness characteristics. While managing for wilderness characteristics is different than managing for wilderness, it should be noted that wilderness designations can and do occur in direct proximity to commercial, industrial, and residential areas. Please see Section 3.1.11 of the PRMP for a full discussion of BLM's wilderness characteristics inventory and how specific areas were rated with regard to the wilderness characteristics they exhibit.

14(SR279)
Summary Comment: The RMP should not manage any lands for wilderness characteristics because the IFNM designation provides enough protection already, similar to BLM's rationale for not continuing the ACEC designation under the preferred alternative.
Summary Response: The rationale for ACEC designation is not necessarily the same as that for management of lands to protect wilderness characteristics. While ACEC designation may be redundant in the IFNM because the cultural and natural resources are protected by the designation, and therefore do not require "special management," the goals and objectives of managing areas to protect wilderness characteristics (i.e., naturalness, outstanding opportunities for solitude, primitive and unconfined recreation, etc.) are not explicitly addressed. Therefore, establishing some areas to be managed to protect wilderness characteristics attempts to address the public's desire for a diversity of recreational experiences in the IFNM. The allocation of an area to be managed for its wilderness characteristics does not redundantly or inherently "overlap" with other allocations; each allocation is based upon the presence of a distinct resource and is tied to management prescriptions aimed at managing that specific resource. This does not preclude some management actions from indirectly benefiting other resources; BLM does not consider indirect benefits to be redundant management.

14(SR286)
Summary Comment: BLM does not have the authority under the Proclamation, FLPMA, 1964 Wilderness Act or other regulations to manage lands for wilderness characteristics.
Summary Response: The allocations proposed or established in the RMP neither establish a wilderness area pursuant to the Wilderness Act of 1964 nor a wilderness study area. Please see the response to comment 14(114) above for discussion regarding the authority of BLM to manage lands for wilderness

characteristics. The proposed alternative would protect wilderness characteristics in those areas where wilderness characteristics are reasonably found and are of relatively high quality.

14(SR287)
Summary Comment: Motorized travel and recreation is regulated via the Presidential Proclamation, the travel management plan, and recreation management zones. Allocating an additional management layer is unnecessary and may interfere with AGFD's ability to fulfill wildlife management objectives. BLM should reconsider the decision to allow for public use along already established roadways.
Summary Response: By definition, areas that were considered for management of wilderness characteristics did not include existing routes; therefore, BLM's identification of wilderness characteristic areas would not change AGFD's ability to fulfill wildlife management objectives. The designation of specific routes for motorized or non-motorized travel considered the need for each route, as described in Appendix G of the Draft RMP/EIS. Many of the motorized routes bordering the areas identified with wilderness characteristics would remain open for motorized travel and available for use by the public. Any routes with travel restrictions within the areas managed to protect wilderness characteristics would remain available for public use by non-motorized means. Those routes also would be available for the AGFD and BLM to fulfill wildlife management objectives. BLM considered AGFD management objectives and responsibilities during the route designation process and in defining related allocations.

14(SR306)
Summary Comment: BLM should not have goals related to wilderness characteristics (naturalness and outstanding opportunities for solitude and primitive and unconfined recreation) because Alternative D would not include areas managed for wilderness characteristics.
Summary Response: Goal 1 in Table 2-11 has been revised to focus on opportunities for naturalness, solitude, and unconfined recreation; the language "within identified areas" has been removed because Alternative D does not include identified areas to manage specifically for the protection of wilderness characteristics. BLM would use other land use plan decisions to provide the opportunities identified within the goal (e.g., recreation management zones).

14(SR308)
Summary Comment: Objective 1 should be explicitly tied to public lands and recognize valid existing rights.
Summary Response: The objective applies only to public land and is subject to valid existing rights, as are all the goals, objectives, and management decisions considered by BLM. It is not necessary to restate this for every goal, objective, and decision within the document, because it qualifies as management common to all alternatives under the provisions of the Proclamation (see Section 2.3.1). However, the objective has been rephrased to clarify that it applies only to lands identified for management to protect wilderness characteristics.

14(SR309)
Summary Comment: Map 3-10 pertaining to ROS [Recreation Opportunity Spectrum] shows a portion of the monument identified for wilderness characteristics under Alternative B as an industrial area for recreation. These classifications are not compatible on the same piece of property.
Summary Response: Map 3-10 characterizes the ROS inventory classes. The areas shown with the "industrial" legend indicate that the setting is influenced by land use activities on or adjacent to those lands, including mining operations west of the Silver Bell Mountains. This characterization is not a management prescription. Some of the effects of the adjacent mine on the recreational setting on public land in the IFNM are largely buffered by the mountain ridge. The Recreation Opportunity Spectrum has been modified slightly to account for this influence.

14(SR310)
Summary Comment: The classification of lands to maintain wilderness characteristics is very misleading to the general public in that it gives the impression that the BLM has the lawful ability to designate wilderness areas.
Summary Response: In accordance with BLM's 2005 Land Use Planning Handbook, BLM is obligated to review areas that may contain wilderness characteristics. BLM does not designate wilderness or propose new wilderness study areas. Refer also to summary comment and response 14(636) for additional information regarding wilderness designations.

14(SR311)
Summary Comment: Only very basic direction exists (from [BLM's] Washington and the State Office) pertaining to the allocation of areas to be managed for their wilderness characteristics. Based on the lack of clear and specific direction on management of areas with wilderness characteristics, there will be a variety of interpretations of how these allocations should be applied, based on personnel and turnover in agency officials.
Summary Response: The approved RMP will establish the specific direction for managing resources and uses within the IFNM based on local conditions consistent with national policy and direction. The guidance established in the RMP will ensure that future managers respond to needs in the appropriate manner.

14(SR312)
Summary Comment: Routes should allow for public use along already established roadways.
Summary Response: With minimal exception, all travel routes identified in the route inventory would be available for public use, subject to travel restrictions. Public use of some routes would be allowed by motorized vehicle, while other routes would require non-motorized means of travel. The Proclamation directs that all off-road motorized and mechanized vehicle use be prohibited, except for emergency or authorized administrative purposes. Under Alternative C (the proposed alternative), areas managed to protect wilderness characteristics include 9,510 acres of public land administered by BLM in the West Silver Bell and Roskruge mountains. Though no new roads have been proposed to provide motorized access in the IFNM, and several roads within or near the areas managed to protect wilderness characteristics would be designated for non-motorized travel, motorized access would be provided to and around these areas as shown on Map 2-13. Within areas managed to protect wilderness characteristics, approximately 4 miles of routes would be designated as a non-motorized trail.

14(SR313)
Summary Comment: The information submitted regarding citizen-proposed wilderness constitutes significant new information that must be addressed in this RMP. NEPA requires an analysis of the potential environmental direct, indirect, and cumulative effects of oil and gas development on these areas and consideration of protection for them.
Summary Response: BLM considered the information submitted during scoping by the Arizona Wilderness Coalition and conducted a subsequent inventory and analysis of the IFNM for areas with wilderness characteristics. That information was used to develop alternatives for lands managed to protect wilderness characteristics. No oil and gas development is proposed within the IFNM, there are no existing oil and gas leases, and there is no potential for this resource to occur in the planning area; therefore, the issue was not addressed in the Draft RMP/EIS.

14(SR315)
Summary Comment: Include guidelines for anticipated uses and activities in areas possessing wilderness characteristics.
Summary Response: Anticipated uses and activities on lands managed to protect wilderness characteristics are identified in Table 2-14 under Primitive RMZ objectives. The Draft RMP/EIS also

identified direct as well as indirect but complementary management actions for lands managed to protect wilderness characteristics (see management decisions for Lands Managed to Maintain Wilderness Characteristics, Recreation, Travel Management, and Visual Resource Management). Other sections also contain management actions that complement the objective of protecting wilderness characteristics.

Category 15: Energy and Minerals

15(103)
Comment: The Silverbell Mine is a major threat with their mountains of tailings and I wonder what poisons they are seeping into the groundwater. They dominate the drive around the mountain and one can see dying vegetation near these tailings. Why don't they have to have an environmental impact study?
Response: Silver Bell Mine is required to comply with Federal, State, and local laws, regulations, and policies governing mining activities and environmental protection, including water quality. Only undertakings located on Federal lands (including Federal mineral estate) or funded by the Federal Government are required to conduct an EIS. A small tailings pile (approximately 9 acres) from the mine is located on BLM land, but this predated NEPA and is therefore exempt from analysis under NEPA so long as additional activities are not proposed for this site.

15(381)
Comment: The mining company Asarco should be required to restore fully the land it illegally disturbed within the monument [because] restoration of the land will help in protection of wildlife, vegetation, and reducing the impact on scenic and visual resources.
Response: Asarco has reclaimed the areas of trespass within the IFNM and vegetative monitoring in this area has indicated that sufficient recovery of the vegetation has occurred based on criteria outlined in the reclamation plan for the area.

15(382)
Comment: Monument should be managed to allow total access to all "salable minerals" on all non-BLM lands. ARPA is concerned with proper mineral and aggregate valuation of State land and private lands that could be ultimately affected by disallowing future exploration and access to vital materials.
Response: The Proclamation that established the IFNM withdrew all Federal lands and interests in lands (including minerals) "from all forms of entry, location, selection, sale, and leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument." As shown on Map 3-7, a majority of the minerals within the IFNM are Federal minerals, and are withdrawn. Where minerals are State or privately owned, BLM would consider the development of new routes to provide access across BLM land to non-Federal lands or non-Federal resources (i.e., inholdings) if and when such legal public access is required (refer to Table 2-16). BLM would follow this approach under all alternatives.

15(383)
Comment: the Association requests that the BLM continue to consider multi-use, future needs and growth trends, required infrastructure, proper resource characterization to avoid sterilization and limited resources in proximity to the market to meet those demands. In so much as an ore body is an economic term driven by demand and the technological ability to extract materials. Further, the proximity of the materials to future markets should along with the demands of a vibrant population and economy require more accessible materials and time frames. ARPA requests that contingencies be in place to avoid limiting access to vital natural resources as such dynamics arise.
Response: It is outside BLM's authority to include contingencies in the RMP to allow for minerals or mineral materials to be extracted from the IFNM as future demand for such resources increases in proximity to the monument. The Proclamation establishing the IFNM states that "all Federal lands and

interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument." BLM does not have the authority to reverse the requirements imposed by the Proclamation.

15(385)
Comment: Resource Management Alternatives for Energy and Mineral Resources
"Objective 1: Prevent unnecessary and undue degradation from mining activity on grandfathered mining claims that have established valid existing rights."
SBM supports the inclusion of valid existing rights in the objective however this objective is duplicative of existing environmental laws and regulations as they would be applied to new mining activity. Mining on the monument by its very nature will cause degradation of the undisturbed landscape. The objective of preventing unnecessary and undue degradation is already in place under existing law. The objective should be re-written so that it states, "Prevent unnecessary and undue degradation from mining activity outside of the mining operations on grandfathered claims that have valid existing rights."
Response: The objective applies specifically to the areas of grandfathered mining claims, as this is where disturbance would be anticipated, rather than in areas outside the mining claims. Despite the potential for existing laws and regulations to limit unnecessary degradation, the suggested text would imply that there would not be any limitations in areas of existing mining claims, which would not be the case. BLM would require a plan of operation to minimize potential adverse effects on other resources or uses as a result of mining activities. BLM would require compliance with 43 CFR 3809 regulations which require a plan of operations, compliance with NEPA, compliance with all applicable State and Federal laws.

15(386)
Comment: 3.2.1.2 Mineral Resources
Thus, no new mining claims or mineral development can occur on the Federal mineral estate within IFNM.
This statement should be corrected by adding:
...with the exception of areas with valid existing claims.
Response: The text has been modified to read: "Thus, no new mining claims can be located on the Federal mineral estate within the IFNM. Mineral development could occur only in areas of valid existing claims."

15(387)
Comment: Summary - Cumulative Impacts
"Cumulative impacts from surface disturbing activities could include habitat fragmentation, including some important movement corridors. State, county, and city comprehensive management plans would restrict surface disturbing activities, resulting in some mitigation of habitat degradation."
Restriction of surface disturbing activities should be limited to BLM initiated activities. Any surface disturbing activity on valid existing mining claims should be subject only to the regulations in 43 CFR Subpart 3809, and not to restrictions imposed by overlapping management plans.
Response: Surface-disturbing activity on valid existing claims would be subject to Federal, State, and local laws, regulations, and policies, not just the regulations in 43 CFR 3809. BLM does not have the authority to exempt mining activities from other regulatory requirements through the RMP.
It also should be noted that the cumulative impacts of surface disturbance described in the summary refer to surface disturbance from any activity from community development to recreational uses, not just mining activities. The cumulative analysis indicates that throughout the broader region, surface-disturbing activities are going to occur, but that State, county, and city management plans could influence the magnitude of disturbance. The Draft RMP/EIS does not imply that these local regulations or policies would necessarily restrict mining activities. To limit the restriction on surface-disturbing activities to

solely BLM-initiated activities would omit a large number of activities that occur on BLM lands from any type of restriction, resulting in the potential for surface disturbance throughout the IFNM.

15(389)
Comment: Resource Management Alternatives for Energy and Mineral Resources
Implementation-Level Decisions
Number 2 discusses the prioritization of reclaiming abandoned mines. Consideration should be given to the historical value of mines when making the decision to reclaim and what form of reclamation will take place.
Response: As mentioned on page 2-5 of the Draft RMP/EIS, all implementation-level decisions will be subject to the appropriate NEPA analysis prior to initiating any action on the ground. BLM would consider the historical value of a mine and what form of reclamation would take place as part of that analysis.

15(474)
Comment: 3.2.1.1 Renewable Energy Resources
"Solar energy resources in the planning area are considered adequate for generating electricity using photovoltaic cells."
SBM supports the development of solar energy resources within the IFNM and recommends inclusion of a management alternative for the development of solar energy production in specific areas of the IFNM.
Response: Solar energy production was not identified as a planning issue during scoping and is not addressed in the management alternatives. However, future authorization of development of solar resources within the IFNM is highly unlikely because solar developments have been identified as an intensive land use by BLM and BLM may consider them incompatible with the purposes of the IFNM. Moreover, the land use authorization required for development of solar energy would be a right-of-way, per 43 CFR 2800, and under the Proposed RMP the entire IFNM would be designated an avoidance area for future rights-of-way.

15(SR70)
Summary Comment: The RMP for IFNM must recognize and acknowledge the validity of existing mining rights in all aspects of the proposed alternatives.
Summary Response: The Proclamation that established the IFNM recognized all valid rights in existence at the time of the monument designation. This is noted and discussed under Section 2.3, Management Common to All Alternatives. There are no alternatives in Table 2-12 under Energy and Mineral Resources that discuss allowing or prohibiting mining in the IFNM because that use is subject to valid existing rights according to the Proclamation that established the IFNM. BLM does not have the discretion to change that through a decision in the RMP.

15(SR439)
Summary Comment: The Final EIS should clarify the location of the Silver Bell Mine and the other 33 active or abandoned mine sites in the IFNM because the text on pages 3-43, 3-63, and 3-71, and Map 3-8 of the Draft RMP/EIS seems inconsistent.
Summary Response: The Silver Bell Mine is outside the planning area boundary; however, Asarco (Silver Bell Mine) has claims within the IFNM in the vicinity of the existing mine (as shown on Map 3-8). The language on page 3-43 has been modified to read: "The only active mine near the IFNM (adjacent to the IFNM boundary) is the Silver Bell Mine, a copper mine." The language on page 3-63 has been modified to read: "The Silver Bell Mine, located outside, but immediately adjacent to the planning area boundary, is currently operating." The language in the Proposed RMP/EIS Section 3.6.1 has been modified to read: "Currently available data show 33 mine sites and 225 existing mining claims in the IFNM (USDI, BLM 2004b)."

15(SR477)
Summary Comment: The Mining and Minerals Policy Act of 1970 and the National Materials and Minerals Policy, Research and Development Act of 1980 have been omitted from the list of legislative requirements. The valid existing mineral rights in the IFNM should be managed consistently with the policy of promoting an orderly and economic development of domestic mineral resources.
Summary Response: The legislative requirements described in Section 1.4 are the primary requirements that influence BLM's development of an RMP; the information presented is not an exhaustive list of the laws, regulations, and policies applicable to public land administered by BLM. The language of the introduction of this section has been modified to read "These and other laws, regulations, and policies provide the framework for management of the IFNM." In accordance with the Proclamation, management of the IFNM will be subject to valid existing rights, which include valid existing mining claims.

Category 16: Livestock Grazing

16(316)
Comment: And how do you come to think that grazing causes air pollution on the national monument? I just don't know. And also, if you had air particulate studies done, near corrals even or areas that cattle might be in, how might I get a copy of that?
Response: The impact analysis in Section 4.3.1.2 has been revised to more clearly indicate how wind erosion could result in localized, temporary reductions in air quality. There were no air particulate studies completed specifically for this RMP. The analysis of impacts on air quality included a qualitative comparison of the proposed management decisions based on air quality conditions as discussed in Chapter 3. Refer also to comment and response 16(SR54) for additional information regarding wind erosion and livestock grazing.

16(317)
Comment: I have seen nothing in Ironwood that approaches the requirement of Taylor Grazing Act language for 'chiefly suitable for grazing." The low total AUMs are a joke -- the numbers prove there is not one family job out there with all of it put together. Any economic analysis, when done right, proves the permittees far better off if they were simply cashed out and given bank CD's.
Response: The Taylor Grazing Act of 1934 provides authorization to the Secretary of the Interior to regulate and administer grazing use of all public lands. Lands within the IFNM are outside a grazing district and are not required by the Taylor Grazing Act to meet the "chiefly suitable for livestock grazing" determination. Current Federal regulations prevent agency buyouts of grazing permits and leases.

16(318)
Comment: There just isn't the forage out there in the Sonoran Desert given drought 7 years out of 10 to run an authentic ranching operation -- and the vegetation trend is downward based on my observations. If it meets BLM Rangeland Standards and annual utilization, then the standards need to be raised to reflect reality.
Response: Under all alternatives, livestock grazing would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, which were developed in coordination with local input from resource advisory councils and under the NEPA process, which included public involvement. Changes to those standards are beyond the scope of this planning effort.

16(319)
Comment: The BLM should not attempt to regulate grazing under the Clean Air Act. The allegations incorporated into the DRMP that cattle grazing causes air pollution are scientifically unfounded and violate FLPMA multiple use mandates and also violate the Soil and Water Conservation Act of 1977.

Response: The BLM does not intend to use the Clean Air Act as a tool to regulate grazing in the IFNM. Rather, the BLM intends to abide by all provisions of the Act, regardless of the selected alternative. This includes managing all aspects of the IFNM in accordance with the Act. The levels of livestock grazing/ trailing that occur in the IFNM under any of the alternatives are not likely to generate dust at levels that would require action under the Clean Air Act. However, the Draft RMP/EIS must disclose the potential direct and indirect impacts from livestock management activities, including dust.

16(320)
Comment: The Morningstar and Tejon Pass allotments should be restored to Perennial/Ephemeral status. The arbitrary and capricious downgrade to straight ephemeral in 1991 was conducted outside BLM range management policies and may have been illegal.
Response: The range of alternatives in the Draft RMP/EIS for livestock grazing in the IFNM included this possibility in Alternatives C and D. However, in the Proposed Plan, both allotments continue to be classified as ephemeral to allow BLM to collect the necessary data to properly analyze the effects of reclassifying these two allotments as perennial. While the allotments do not meet the criteria for an ephemeral allotment (see Appendix F), reclassification requires that forage capacity be identified, which was not done or analyzed in the Draft RMP/EIS. BLM is conducting additional monitoring to determine what appropriate forage capacity would be if reclassification to perennial were to occur; therefore, the decision to reclassify these allotments is being deferred until BLM can collect the data necessary to support and identify an appropriate forage capacity level and conduct an associated environmental analysis. BLM also is looking into the process by which these allotments were initially classified as ephemeral.

16(321)
Comment: We object to any permissions granted by the BLM to the Tohono O'odham Nation or any other owner of stray livestock, to enter the IFNM grazing allotments to search for their stray livestock, unless the affected IFNM grazing permittee or the permittee's representative, along with an Arizona Department of Agriculture brand inspector, are notified in a timely manner and are both present at all times during the search and gather process.
Response: The collection of stray livestock is governed by the State of Arizona and is administered by Arizona's Department of Agriculture. Collection of stray livestock within the IFNM would be consistent with the applicable laws and regulations.

16(322)
Comment: Alternative B, which terminates cattle grazing, would increase the amount of fine, dry fuels and significantly increase the probability of air quality degradation due to wildfire. Alternatives C and D, which downgrade the allotments from perennial/ephemeral to straight perennial status, will increase the amount of fine dry fuels that grow in the winter rainy season, and contribute to a higher probability of wildfire.
Response: The comment is addressed under Section 4.3.7.3 and 4.3.7.4 of the Draft RMP/EIS.

16(324)
Comment: Page 2-92 Summary comparison of impacts, Fire Ecology, last sentence. "In addition, managing 11 allotments as perennial livestock grazing could decrease the amount of fine fuels available for ignition."
NOT TRUE. Downgrading nine of the eleven allotments from perennial/Ephemeral to perennial would INCREASE the amount of fine fuels for ignition.
Response: The rationale for the impact statement is derived from a comparison with Alternative B, which reduces livestock grazing over time. The comment that altering the grazing authorization status of certain (nine) allotments to perennial would result in an increase of fine fuels assumes that the lessee would

request (and be granted) authorization to graze above the preference. Text in this section of the document has been revised to provide clarity.

16(325)
Comment: The NMSU literature review examined studies of grazing effects on soil compaction, across the Western United States, and in the abstract stated, "Although more than 30 studies consistently show that controlled grazing adversely impacts soils through increased compaction, reduced infiltration and increased erosion, these impacts are minor and are ameliorated by natural processes that cause soil formation, soil deposition and soil loosening." But the DRMP/EIS assumes all grazing destroys the soil.
Response: The Draft RMP/EIS makes no reference to soil destruction through livestock grazing. The Draft RMP/EIS reports on page 3-8 that "soils of this region support … livestock grazing" and, as an impact common to all alternatives, states that "managing areas to meet Standard 1 of the Arizona Standards for Rangeland Health could improve soil and watershed conditions by reducing erosion and sediment loads."

16(326)
Comment: The DRMP/DEIS references allotment evaluations for the Arizona Standards and Guidelines for Grazing Administration, and Table 3-10 states that all of the allotments were evaluated between 1999 and 2003. All are reported to be meeting standards, though the finer points of rangeland health are not disclosed. DRMP/DEIS at 3-44. The riparian standard was not evaluated for any of the allotments. This is a critical oversight, given the wildlife and plant species that depend upon and occur in riparian and xeroriparian washes, and the fact that livestock are not excluded from these areas under the preferred alternative.
Response: Arizona Land Health Standard 2 applies to riparian-wetland areas only. This standard does not apply to any allotments in the IFNM because none of the dry washes support riparian vegetation. The xeroriparian areas identified in Section 3.1.4.1.2 and on Map 3-4 of the Draft RMP/EIS would not qualify as riparian areas because they do not support riparian plant communities. Revisions in the text clarify that the criteria for riparian areas are from Technical Reference 1737 15, Riparian Area Management. Xeroriparian areas are a subset of the uplands that exist where water that runs off collects. Arizona Land Health Standard 1 covers soil conditions that support proper functioning of hydrologic, energy, and nutrient cycles, which is the function of xeroriparian areas in the uplands.

16(327)
Comment: The preferred alternative would make all eleven grazing allotments perennial instead of ephemeral, a distinction that shifts the authorizations on two allotments (Tejon Pass and Morning Star) from being available to livestock where "precipitation patterns generate seasonal production of forage available for livestock," to grazing being authorized, "yearlong at the grazing preference level." Since no grazing preference level is yet assigned for these two allotments, it is impossible to know the impacts of this proposed action on these 28,021 acres.
Response: Identification of forage capacity levels (which leads to establishment of grazing preference levels) for Tejon Pass and Morning Star allotments was inadvertently omitted in the Draft RMP, and thus was not analyzed in detail. The Proposed RMP continues the ephemeral classification of these two allotments until data can be gathered that will allow proper analysis of potential reclassification. See also response to comment 16(320), and Appendix F for more information.

16(328)
Comment: Livestock grazing has other more direct impacts on wildlife as well. Mortality of owls which have become entangled or impaled on fencelines has been documented. See Avery et al 1978, Anderson 1977, Fitzner 1975. Fences, unless properly constructed, can also impede wildlife movement across the landscape. All livestock grazing should be phased out of the Monument and unsightly and unsafe fencelines should be removed.

Response: When an action would result in similar impacts on several species, a general impact statement is included. Therefore, mortality of avifauna as a result of fence lines would fall under the general impact of species mobility which is addressed in Sections 4.3.5 of the Draft RMP/EIS. The alternative that would phase out livestock grazing may actually increase the potential for fence lines in the IFNM (see Section 4.3.5.3).

16(329)
Comment: Fully 62 percent of BLM lands within the Monument are classified as custodial. Thereby, we formally request reclassification of all allotments for active management, be that "improve," or "maintain."
Response: Classification of allotment categories is not an RMP decision and thus is outside of the scope of this plan. However, BLM has recently reclassified several allotments within the IFNM based on new guidance in BLM Instruction Memorandum 2009-018 that further clarifies criteria for allotment classifications. As a result, all allotments on the IFNM have been classified as "Maintain." See response to comment 16(489) for more information.

16(330)
Comment: The preferred alternative classifies all eleven grazing allotments perennial. This decision disregards the recommendation of the TNC Study that "[t]he BLM's use of ephemeral allotments could be an appropriate stating point for a Sonoran Desert-specific livestock grazing management strategy."
Response: As the quotation taken from the TNC study indicates, the use of an ephemeral grazing strategy could be an appropriate strategy for livestock grazing in the Sonoran Desert, but this largely depends on various factors including weather patterns for specific regions of the Sonoran Desert and management factors related to land ownership and allotment management. In the IFNM, both of these factors are at play. Situated in the eastern portion of the Sonoran Desert, the IFNM receives more rainfall than other, drier areas that the TNC study focused on. In addition, because of mixed ownership in the IFNM (i.e. Arizona State Trust lands), BLM has limited control in setting flexible stocking rates such as those associated with ephemeral use.

16(331)
Comment: We support the BLM in allowing for voluntary relinquishment of grazing leases in the preferred alternative. However, BLM should provide a provision whereby upon voluntary relinquishment, the agency recommend to the Secretary of Interior that the monument lands be removed from the grazing district under Section I of the Taylor Grazing Act. This is in accordance with the May 13, 2003, Solicitor's Memorandum to the Assistant Secretaries for Policy, Management and Budget, Land and Minerals Management and the Director, Bureau of Land Management clarifying the Solicitor's Memorandum M 37008 (issued October 4, 2002).
Response: Allotments within the IFNM are leased under Section 15 of the Taylor Grazing Act, which applies to grazing leases on public lands outside grazing district boundaries.

16(332)
Comment: Given the lack of monitoring and actual use documentation on the IFNM, enforcement of livestock trespass must be an ongoing problem. The DRMP/DEIS does not address this.
Response: Enforcement of livestock trespass is an administrative action addressed in the Draft RMP/EIS (Appendix D).

16(337)
Comment: In coordination with AGFD, implement closures to human entry from January 1 thru April 30... Closures to human entry will impose economic hardship on the affected cattle ranchers whose allotments would then be inaccessible to them.
Response: The impacts are addressed in Sections 4.4.2.3 and 4.5.3 of the Draft RMP/EIS.

16(339)
Comment: the decision to remove the "unnecessary" [grazing] infrastructure assumes that the infrastructure does harm. This has not yet been proven via the scientific method, but appears to implement a conclusion reached absent sufficient relevant data collection.
Response: Grazing infrastructure is considered unnecessary when it is no longer needed for the purpose for which it was originally intended, and no longer serves a purpose. No "harm" is implied, only purpose. If any facility, including grazing infrastructure, serves no further purpose, it can be removed, regardless of whether it does any harm. However, removal of unnecessary infrastructure would be analyzed as part of a site-specific NEPA process.

16(340)
Comment: In addition to analyzing management on the national monument, the DRMP/DEIS should have assessed the cumulative impacts of livestock grazing on the adjacent BLM, state trust, and private lands in context of its impacts on monument objects. For example, some species of wildlife or plants that are protected in the IFNM may be affected by off-Monument grazing management (i.e., impacts may include delayed recovery, reduced dispersal potential, or invasive species competition resulting from grazing disturbances). NEPA requires this kind of assessment; the DRMP/DEIS failed to provide it.
Response: The analysis of cumulative impacts, as defined by CEQ regulations is "…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 actions" (40 CFR 1508.7). Since any grazing outside the national monument is an action outside the scope of this plan, the cumulative effects of that action are only addressed in so far as the actions within the monument are additive to it. Affects of grazing outside the monument on monument objects is outside the scope of the plan and analysis because it is outside the scope of the current analyzed action.

16(341)
Comment: There are many studies which demonstrate that, with management, grazing will encourage not only biodiversity of plants, but wildlife as well.
Response: The Draft RMP/EIS does not mean to imply that all grazing creates adverse impacts on vegetation or wildlife. The Arizona Standards for Land Health and Guidelines for Grazing Administration would apply to all alternatives and provide a basis from which grazing could be administered and monitored to promote desired future conditions objectives.

16(343)
Comment: Congress finds that a substantial amount of the Federal range lands is deteriorating in quality, and that installation of additional range improvements could arrest much of the continuing deterioration and could lead to substantial betterment of forage conditions with resulting benefits to wildlife, watershed protection, and livestock production."
Response: The Draft RMP/EIS would allow for additional range improvement projects under Alternatives A, C, and D. These types of projects would be evaluated with an implementation-level NEPA document such as an Environmental Assessment, Categorical Exclusion, or EIS.

16(344)
Comment: Appendix F of the Draft RMP states that the reclassification of the two fully-ephemeral allotments to perennial status was based on these allotments no longer meeting the criteria for an ephemeral classification. This conclusion, however, is not corroborated by scientific data, and it is unclear whether the BLM considered the impacts of year-round grazing on monument resources, such as wildlife habitat and vegetation.
Response: Appendix F of the Draft RMP/EIS states that there are several reasons why these two allotments no longer meet the criteria for ephemeral classification. The allotments produce more than

25 pounds per acre of desirable grass species. The community is composed of more than 5 percent desirable forage species. Most of the rangelands in the allotments are in a high or better ecological status. There are very few areas that do not have the potential to improve and produce a dependable supply of forage. However, the comment is correct in that the Draft RMP/EIS did not fully analyze the potential impacts of a perennial grazing system for two allotments because no forage capacity level has been identified for them. The Proposed Plan continues the ephemeral classification of these two allotments until data can be gathered that will allow proper analysis of potential reclassification. See also response to comment 16(320) for more information.

16(345)
Comment: Under the current preferred alternative, BLM is not making a determination as to whether livestock grazing is adversely affected monument objects until leases are cancelled or voluntarily relinquished (Draft RMP 2-50). This alternative does not provide protection of monument objects from grazing impacts prior to cancellation or voluntary relinquishment. Thus, BLM should determine whether livestock grazing is adversely affecting monument objects before cancellation or voluntary relinquishment of leases.
Response: BLM evaluates and monitors livestock grazing leases for consistency with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. BLM also identifies management concerns during other types of monitoring and management activities such as removing trash and patrolling recreational activities. In the course of actively managing monument activities, BLM makes observations of activities, including livestock grazing, which potentially may result in damage to monument objects and takes action to rectify situations when damage is observed or likely to occur.

16(480)
Comment: As a NRCD advisor, I sat in on meetings where the NRCD is very concerned that there was no comments in this document that credited these ranches with putting out monitoring devices, monitoring their allotments, so that they can see the quality of the forage that is out there, the plants, and see how their ranch management plans are working out.
Response: The monitoring information collected on allotments is used during the assessment of an allotment and in determining whether an allotment is managed in accordance with Arizona Standards for Rangeland Health and Guidelines for Grazing Administration; all allotments within the IFNM are meeting the standards (refer to Table 3-10). The RMP does not specifically include the information collected by permittees and NRCS because decisions made by BLM based on these data would be made at the implementation level, not as decisions within the RMP.

16(483)
Comment: Wildlife ecologists not authors with agriculture or economics credentials authored the section discussing agricultural economics. Only one scientific paper discussing impacts of livestock grazing on range ecology is referenced in the bibliography, despite the numerous peer-reviewed scientific reports and literature reviews on grazing that were delivered to the BLM by our cooperators during the six-year planning process. The single study BLM referenced in the DRMP/EIS, lumps any and every type of grazing and grazing management together and draws generalized conclusions with little if any relevance to grazing in the IFNM. In fact the entire report devoted only three paragraphs to grazing in the Sonoran desert, and those paragraphs lumped impacts of burro and cattle grazing together as if there is no difference. We therefore consider the DRMP/EIS non-representative of an “interdisciplinary approach.”
Response: The social and economic sections of the RMP include references from USDA, BLM, Mayro, and Interorganizational Committee on Principles and Guidelines; an additional reference was added in Section 3.5.1.2 of the Proposed RMP/EIS for the indirect and value-added impact of livestock grazing, citing Economic Impacts from Agricultural Production in Arizona, Jorgen R. Mortensen, University of Arizona, July 2004.

The analysis of the impacts of livestock operations were conducted based on the information compiled from these references together with BLM's specific knowledge of the conditions within the IFNM (including the best available data on livestock operations and AUMs on BLM allotments, which are closely tracked). The preparers of the RMP include individuals with diverse backgrounds in natural and cultural resource management, as well as social sciences, including economics, which provided BLM with an interdisciplinary team. See the list of preparers in Section 5.9 of the PRMP.

16(486)
Comment: Page 2-51 Table 2-13. Resource Management Alternatives for LIVESTOCK GRAZING, Implementation Decisions
Item 2. "Increase the number and variety of wildlife and livestock exclosures to represent various ecosystems, and monitor these regularly."
This is stated without any indication of a reason, or any limitations. We wonder who would be expected to pay for this.
Response: The decision (now Decision 6) has been modified to add "as necessary" to the beginning of the decision, to indicate that where such exclosures would provide beneficial impacts on wildlife, livestock, and/or ecosystems, such projects would be pursued. The site-specific actions would be identified on a case-by-case basis, with funding determined at that time.

16(487)
Comment: More importantly, being a retired USFS employee, I am well aware of the damage grazing cows inflict on riparian resources.
Response: None of the dry washes within IFNM support riparian vegetation. The xeroriparian areas identified in Section 3.1.4.1.2 and on Map 3-4 would not qualify as riparian areas because they do not support riparian plant communities. Revisions in the text clarify that the criteria for riparian areas are from Technical Reference 1737-15, Riparian Area Management.

16(489)
Comment: We disagree with the classification of six allotments within the IFNM as "custodial." The RMP/EIS states, that custodial classifications are merited "when there is a low potential biological response to any change in management, the allotment contains only a small amount or public lands, or there is a lack of any identified resource conflicts." On the IFNM, there is no evidence that the exclusion of livestock would not have significant long-term effects and we hereby, with these comments, enumerate and identify the resource conflicts.
Response: Classification of allotment categories is not an RMP decision and thus is outside of the scope of this plan. However, BLM has recently reclassified several allotments within the IFNM based on new guidance in BLM Instruction Memorandum 2009-018 that further clarifies criteria for allotment classifications. As a result, all allotments on the IFNM have been classified as "Maintain." BLM classifies allotments as Improve, Maintain, or Custodial based on information and evaluations of resource conditions. Allotments are classified as Maintain where land health standards are met or where livestock grazing is not a significant causal factor for not meeting the standards and current livestock management is in conformance with guidelines; or where an evaluation of land health standards has not been completed, but existing monitoring data indicate that resource conditions are satisfactory.

16(490)
Comment: We support the provisions in the preferred alternative of the DRMP/DEIS that would allow voluntary relinquishment of grazing leases. We offer (in Appendix A of these comments [Appendix A. Matrix for assessing grazing allotment closure. From the Upper Deschutes RMP (Prineville District, Oregon BLM). BLM. 2004. Proposed Upper Deschutes Resource Management Plan/Final Environmental Impact Statement. BLM, Prineville District, Deschutes Resource Area. (September 2004). Vol. l: 170. Alternative 7(Preferred Alternative)] the language and matrix adopted in another BLM RMP to determine

the relative values of public lands grazing allotments in context of other attributes. We note that the relative value of Monument objects and resources is increased by the very designation of IFNM and ask that the BLM incorporate this increased valuation to the matrix parameters.
Response: BLM's decisions and the analysis are consistent with IM 2007-067, which resulted from the information presented in Appendix A of the Proposed Upper Deschutes RMP. However, consistent with the relative value of monument objects, continued use of the allotments managed by BLM in the IFNM is compatible with achieving land use plan management goals and objectives.

16(491)
Comment: Livestock have long been recognized as destructive to young saguaros and the nurse plants on which they depend. See Steenbergh and Lowe 1977. Grazing of the surrounding vegetation leads to increased surface temperatures in the summer, greater risk of freezing in the winter, and exposes young saguaros to herbivores. See Steenbergh and Lowe 1983. At Saguaro National Park, another study found cattle grazing "largely suppressed" germination and survival of saguaros, leading to a population of aging plants with little or no recruitment. See Abouhaidar 1992. Subsequent studies there confirmed that grazing had severely affected the demographic composition of the saguaro forest, with very little reproduction while livestock were present followed by a sudden population boom when grazing was eliminated. See Helbsing and Fisher 1992, Turner and Funicelli 2004.
Response: The 1977 Steenbergh and Lowe study cited in your comment states, in conclusion, that "the 'problem' that we have observed – the 'decline' of specific saguaro populations . . . is neither in biology nor management, but in a limited perspective." This conclusion applies well to other studies cited above; while these studies suggest that livestock could have impacts to saguaro recruitment, they were not conducted at the time livestock grazing was occurring. The majority of these studies measured the effects of historical livestock grazing that occurred in regions that had uncontrolled or unmanaged livestock grazing dating back to the 19th century. Livestock grazing was occurring in these areas as early as the 1700s. By comparison, livestock grazing within the IFNM is a more recent event with significantly lower livestock numbers and has been managed, nearly since it began, in accordance with the Taylor Grazing Act of 1934 and other BLM policy intended to prevent overgrazing and soil deterioration on public lands and preserve the health of the land. The Taylor Grazing Act was enacted shortly after ranchers first began to graze areas within the Monument.
In addition, a number of other studies have shown that saguaro recruitment surges and declines are not necessarily significantly affected by the presence of livestock grazing, but may be more likely tied to climatic factors such as wet versus dry conditions that produce episodic surges of regeneration (see Pierson and Turner, 1998). Pierson and Turner state that "peak regeneration episodes have been observed from 1916 through 1936 in southeastern California (Brum 1973), 1907 through 1959 in the Sierra del Pinacate Reserve in northern Sonora, Mexico (Turner 1990), and 1915 through 1940 at Organ Pipe Cactus National Monument in southwestern Arizona (Parker 1993). In all of those studies, the regeneration surge was attributed to favorably moist climate."
Biological studies and surveys completed in the IFNM indicate the area has extensive forests of saguaros, and they are common throughout most of the monument except on steep north slopes and some valley floors. The densest populations are on bajadas, particularly on the south and east-facing bajadas of the Roskruge, Sawtooth, and Silver Bell mountains. In six IFNM plots saguaro density exceeded 250 total plants per hectare (101 per acre). Of the twenty-two census plots all except one had a substantial percentage of plants in each of the size-age categories. While we have no data to suggest that livestock grazing at permitted levels on the IFNM causes increased surface temperatures, increased risk of saguaro freeze, or increased saguaro mortality due to herbivore exposure, future monitoring of saguaro recruitment and overall health could yield new information about the effects of livestock grazing on saguaros. Activities shown to compromise the protection of monument objects, including the saguaro cactus, can and would be modified to ensure that any impact would be undetectable or measurable only in small and localized areas, and that the integrity of the objects would be conserved for future generations.

16(503)
Comment: The BLM has failed to identify many significant management relationships currently affecting the IFNM. The result of this error of omission is the DRMP/EIS implies that the grazing allotments within IFNM are currently unmanaged and the ranchers are all just in it for money.
For example, we saw no mention of any current ongoing range management procedures, or the Range Resource Management Team's periodic assessments of the grazing allotments. Further, no mention is made of the Memorandum of Understanding for Coordinated Resource Management in Arizona, in which BLM is a partner with 19 other government agencies including the Arizona Association of Conservation Districts for the specific purpose of environmental conservation.
Response: The Draft RMP/EIS explains the ongoing management for rangeland health in Section 2.3 and Appendix F, and the condition of the each allotment is described in Section 3.2.2. Appendix C discloses the Arizona Guidelines for Grazing Administration, which are common to all alternatives as discussed in Section 2.3.2 The RMP makes no implication that grazing allotments within the IFNM are unmanaged. Many of BLM's day-to-day actions with regard to livestock grazing are disclosed in Appendix D.

16(746)
Comment: There are only four AGFD wildlife water catchments on the Morningstar and Tejon Pass allotments (about 75,000 acres of land). On these same allotments, the ranchers built and continuously maintain 22 water sources (a 5.5:1 ratio of private waters to tax-maintained waters.) If the wildlife are to survive, the BLM must not hinder the maintenance of livestock waters.
Response: Maintenance and operation of livestock waters are provided for in the RMP to meet grazing objectives, along with provisions for wildlife access. Motorized access to many of the livestock waters and the AGFD-developed wildlife waters would be retained, or the waters would be accessible by a non-motorized route within a reasonably short distance from a motorized route. Fences, if required to protect resources, would be established in consideration of wildlife movement patterns and would be wildlife friendly in design.

16(SR52)
Summary Comment: Phasing out or relinquishing and/or buying out livestock grazing permits or leases in the IFNM will greatly enhance the area's natural vegetation and help erosion control. It is well known the detrimental impacts that livestock grazing has on desert landscapes and cultural resources, as it severely impacts plant community composition and destroys cryptobiotic soil communities, artifacts, and prehistoric features. Managing these lands as they have been is incompatible with their designation as the IFNM.
Summary Response: The Arizona Standards for Rangeland Health and Guidelines for Grazing Administration are common to all alternatives, and apply to all resources and resource uses. The guidelines state that livestock management practices to achieve desired plant communities will 1) maintain or promote ground cover that will provide for infiltration, permeability, soil moisture storage, and soil stability appropriate for the ecological sites within management units; 2) provide for growth and reproduction of those plant species needed to reach desired plant community objectives; and 3) consider protection and conservation of known cultural resources, including historical sites, and prehistoric sites and plants of significance to Native American peoples. Phasing out livestock grazing permits and leases is considered under Alternative B, and the possible affects of this decision are considered in the Draft RMP/EIS. The potential for the voluntary relinquishment of livestock grazing permits in the IFNM is considered and analyzed under Alternatives C and D. Current Federal regulations prevent agency buyouts of grazing permits and leases. Refer also to summary comments and responses 16(52) and 16(56) for additional information regarding livestock grazing within the monument.

16(SR53)
Summary Comment: Livestock grazing on the IFNM should be limited in order to protect the IFNM. Livestock grazing is very detrimental to the ecological integrity of this Sonoran Desert landscape. There simply is not enough natural forage to support bighorn sheep, pronghorn antelope, and non-native cattle.
Summary Response: Under all alternatives, livestock grazing practices would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, which establish measurable indicators of rangeland health. Guideline 3-2 states that "Conservation of Federal threatened or endangered, proposed, candidate, and other special status species is promoted by the maintenance or restoration of their habitats." Inventory and monitoring data will be collected on a regular basis to determine achievement of land health standards or progress toward achieving standards.

16(SR54)
Summary Comment: The analysis implies that livestock grazing has denuded or will denude public land. This is misleading and has no scientific evidence to support it. Within the Final EIS, the BLM should list the size and locations of those areas that are denuded in a scientific manner.
Summary Response: The text in Sections 4.3 and 4.4 of the Draft RMP/EIS is not meant to imply that livestock grazing is the reason why some areas are more vulnerable to wind erosion than others. It only means to illustrate that livestock grazing activities in these areas could prevent revegetation of those areas. Therefore, the Draft RMP/EIS makes no assumptions regarding the cause of some areas being "denuded." Throughout the Proposed RMP/Final EIS, the use of the term "denuded" has been changed to "sparsely vegetated" or "areas vulnerable to wind erosion" to better reflect conditions within the IFNM. In the Proposed RMP/EIS Section 4.3.1.2, has been revised to state: "This could limit revegetation in areas that are sparsely vegetated, disturbed or vulnerable to wind erosion which could increase particulate matter emission in very localized areas."
The observation that areas in the immediate vicinity of water or shade can sometimes be disproportionately grazed by domestic livestock comes from interdisciplinary team knowledge of resources in the IFNM, review of existing literature, and information provided by BLM resource specialists.

16(SR55)
Summary Comment: Corrals and cattle movement do not generate significant amounts of PM10 (dust). The soil composition in corrals is completely different than the surrounding desert, and the ground is continuously moistened with feces and urine, which inhibit dust.
Summary Response: The analysis of livestock grazing impacts does not imply that significant dust would be generated from areas with corrals or livestock waters. However, the RMP/EIS must disclose the potential direct and indirect impacts from livestock management activities, including those that may be highly localized. Ground and/or surface-disturbing activities are defined in the glossary as "the physical disturbance, which alters the structure and composition of vegetation and topsoil/subsoil." Livestock grazing activities could alter the structure and composition of topsoil, and indirectly subsoil, in areas where compaction occurs.

16(SR56)
Summary Comment: The Draft RMP/EIS should set firm ecological parameters that, only when met, could provide for the reauthorization of grazing on these allotments. Any grazing reauthorization on the IFNM should be subjected to an intensive suitability/capability analysis similar to that which is used by the Forest Service. In the absence of such an alternative, BLM must select Alternative B, as it is currently the only alternative that meets this standard and is within the BLM's legal discretion under the Proclamation establishing IFNM.
Summary Response: The Arizona Standards for Rangeland Health and Guidelines for Grazing Administration establish measurable indicators of rangeland health. The standards and guidelines apply to each alternative. As an administrative action, inventory and monitoring data will be collected on a regular

basis to determine achievement of land health standards or progress toward achieving standards (refer to Appendix D of the RMP/EIS).

16(SR57)
Summary Comment: Ranching in the area has a legitimate foundation and people have built their lives around it. The social value of ranching conveys value to local communities through the conservation of open spaces, ecological values, and the connection to historic ranching in Arizona or a "western" quality of life.
Summary Response: The range of alternatives in the Draft RMP/EIS attempts to present a reasonable range of management options while meeting the requirements of both the FLPMA and Presidential Proclamation 7320. FLMPA established that public land be managed according to the principles of multiple use and sustained yield and in a manner that affords protection to the natural environment. In accordance to these goals, BLM manages public lands so that they are used in a combination that will best meet the present and future needs of the American people for renewable and nonrenewable natural resources. In 2000, the Proclamation established the IFNM to protect sensitive biological, cultural, geological, and other resource values bound up in the land of that area. The action alternatives strive for the goal of acknowledging the cultural, historical, ecological, and economic values of ranching through interpretive efforts.

16(SR58)
Summary Comment: The range of alternatives does not provide BLM flexibility to alter livestock grazing management on an allotment–by-allotment basis.
Summary Response: The RMP-level decisions are meant to provide a broad framework for long-term land use planning.
Under all alternatives, livestock grazing practices would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, which establish measurable indicators of rangeland health. Inventory and monitoring data will be collected on a regular basis to determine achievement of land health standards or progress toward achieving standards. The Draft RMP/EIS considers an alternative (Alternative B) that would remove livestock grazing from the IFNM as existing leases expire.
Adjustments in stocking rates, seasons of use, etc., could be made under any of the alternatives but would be addressed under a subsequent implementation-level NEPA analysis (e.g., environmental assessment, FONSI, etc.)

16(SR60)
Summary Comment: Closing public lands within the IFNM to livestock grazing, by the BLM's own admission, will have the greatest beneficial impacts on recovering formerly denuded landscapes and thereby would improve air quality, would be the best for vegetation communities, and would also retain wilderness characteristics. We note that the Draft RMP/EIS explicitly fails to analyze the removal of livestock pursuant to Alternative B within the cumulative effects sections of the soil and water quality, wildlife and wildlife habitat, cultural and paleontological resources, scenic and visual resources, recreation, lands and realty, travel management, and public safety.
Summary Response: Environmental impacts on the resources mentioned that would result from Alternative B are stated in Chapter 4. These impacts would not be restated under the cumulative impacts section unless there are other past, present, and/or reasonably foreseeable future actions (Table 4-19) that would add incrementally to those impacts already described.

16(SR335)
Summary Comment: The citations used in the analysis of livestock grazing impacts are inadequate. The information used does not include fence-line comparisons such as the Irma Park Pasture. The only reference to a livestock grazing study is Milchunas, which compares grazed areas to ungrazed areas, but

does little to distinguish between the varying types of grazing management, such as which herbivore does the grazing.
Summary Response: Impact analysis for livestock grazing is based on interdisciplinary team knowledge of resources and the IFNM and review of existing information from allotment assessments and scientific literature. Effects on livestock grazing activities and operations were quantified where possible. In the absence of quantitative data, best professional judgment was used. The analysis performed in the livestock grazing section is in compliance with BLM's obligations under NEPA and FLPMA, and as specified in BLM and CEQ regulations.
Milchunas 2006 was not used to identify differences between grazed or ungrazed areas. Milchunas was used to collect information regarding livestock numbers in southern Arizona in the late 1800s to inform the cumulative impact analysis.

16(SR338)
Summary Comment: Changes in livestock grazing place a burden on livestock operators, taxpayers, and could harm resources in the monument.
Summary Response: Under all alternatives, livestock grazing would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, which establish measurable indicators of rangeland health. Inventory and monitoring data will be collected on a regular basis to determine achievement of land health standards, or progress toward achieving standards. The IFNM Draft EIS considers an alternative (Alternative B) that would remove livestock grazing from the IFNM as existing leases expire. Adjustments in stocking rates, seasons of use, etc. could be made under any of the alternatives but would be addressed under an implementation-level NEPA analysis.

16(SR342)
Summary Comment: Early in 2005, we submitted to the BLM an authoritative literature review by New Mexico State University indicating the opposite of the analysis BLM included in the Draft RMP/EIS, but it was discarded by the BLM with the verbal explanation that this literature review of grazing vs. grazing exclusion studies conducted across the western United States does not apply to the IFNM because "Those studies were done in the Chihuahuan Desert. " However, these studies were performed across the western United States.
Summary Response: The comment correctly identifies these studies as being conducted in the Chihuahuan Desert where the response by vegetation to livestock grazing could be different than in the Sonoran Desert. Livestock grazing does contribute to biodiversity as indicated in the studies conducted by Arizona Sonora Desert Museum. BLM has used these studies during the development of the Draft RMP/EIS.

16(SR482)
Summary Comment: The conclusions in the Draft RMP/EIS incorrectly attribute impacts to livestock grazing that are more likely caused by unrelated human activities such as mining, hunting, recreational motorized tourism, or camping near cattle infrastructures.
Summary Response: Impact analysis for livestock grazing is based on interdisciplinary team knowledge of resources and the IFNM and review of existing information from allotment assessments and scientific literature. Effects on livestock grazing activities and operations were quantified where possible. In the absence of quantitative data, qualitative reference information and best professional judgment were used. The analysis performed in the livestock grazing section is in compliance with BLM's obligations under NEPA and FLPMA, and as specified in BLM and CEQ regulations.

16(SR485)
Summary Comment: BLM should coordinate with partnering agencies (including NRCS, Pima NRCD, AGFD, and ASLD) before making any significant changes in vegetation management in response to the cancellation or voluntary relinquishment of a grazing lease.
Summary Response: In determining whether to continue or discontinue grazing following the cancellation or relinquishment of a lease, BLM would consult with other agencies, if appropriate. The Arizona Standards for Rangeland Health and Guidelines for Grazing Administration establish measurable indicators of rangeland health, which would be the primary criteria for BLM's decision making if this situation were to arise.

16(SR488)
Summary Comment: Changing allotments that contain both State School Trust lands and BLM lands to ephemeral/perennial grazing management could conflict with Arizona State Land Department grazing management. If additional fencing was required, under Arizona law, BLM would be required to install new fencing.
Summary Response: In the Proposed Plan, the classification of 9 of the 11 allotments on the IFNM would change from perennial/ephemeral to perennial. Changing the classification of these allotments is consistent with the amount of forage produced on the allotments. This change is also consistent with how the intermingled State Trust lands administered by ASLD are managed. The state Trust lands allotments have a perennial authorization in AUM's and a temporary non-renewable authorization mechanism. Resulting management of the allotments on BLM-managed lands (requiring the need to obtain a temporary, nonrenewable license for additional AUMs on an annual basis) therefore would be consistent with the management of State Trust lands. The social and economic impacts of Alternative C are disclosed in Section 4.5.4 in the Draft RMP/EIS.

16(SR492)
Summary Comment: The change of nine allotments to perennial status sends a message that the BLM believes that livestock grazing only harms the environment, although no scientific studies in the monument have proven this assumption. Therefore, financial harm may come to those nine allotment holders if Alternative C becomes finalized as written.
Summary Response: The allotments within the IFNM do not meet the definition of ephemeral use. The allotments produce more than 25 pounds per acre of desirable grass species, and the community is composed of more than five percent desirable forage species (see Appendix F for criteria that determines allotment classifications). Reclassifying the allotments to perennial from perennial/ephemeral would not eliminate the opportunity to obtain a temporary, nonrenewable license from BLM for additional AUMs on an annual basis when forage conditions warrant and when seasonal use would not result in significant environmental impacts. This change provides BLM with additional discretion in reviewing the seasonal use and protection of monument resources. The social and economic impacts of Alternative C are disclosed in Section 4.5.4.

16(SR493)
Summary Comment: Ranchers should find other pastures for their livestock. Visitors to a national monument should not have to contend with conflicts created by livestock grazing use.
Summary Response: Potential visitor contact with cattle was one of many factors considered during the route evaluation process. The travel system does generally route visitors away from areas where cattle tend to congregate, such as corrals and available waters. Because of the relatively small number of cows spread over a large acreage within the IFNM, visitor-cow conflicts should be kept at a minimum. In addition, visitation is not protected by the monument proclamation, but the proclamation does say that "Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the monument." Despite the feelings of some visitors about contact with cows,

BLM must follow the laws and the proclamation pertaining to livestock grazing on the public lands within the monument. Making the IFNM unavailable for continued livestock use is analyzed in Alternative B of the Draft RMP/EIS.

16(SR502)
Summary Comment: The management decisions and associated impacts of livestock grazing described in the Draft RMP/EIS were not authored by qualified professionals and do not have a scientific basis and need to be backed up by appropriate citations.
Summary Response: Impact analysis for livestock grazing is based on interdisciplinary team knowledge of resources and the IFNM and review of existing information from allotment assessments and scientific literature. Effects on livestock grazing activities and operations were quantified where possible. In the absence of quantitative data, qualitative reference information and best professional judgment were used. The analysis performed in the livestock grazing section is in compliance with BLM's obligations under NEPA and FLPMA, and as specified in BLM and CEQ regulations.

Category 17: Recreation

17(158)
Comment: The recreation study conducted by the University of Arizona in 2004 and visitor use monitoring data were used to identify use volume and patterns, and estimate the frequency of visitor encounters. The UA Recreation study was founded on surveys wherein the participants chose themselves to participate. This type of survey is popular for entertainment purposes but yields meaningless results statistically.
Response: The information in the University of Arizona (2004) study, conducted in cooperation with the BLM, was gathered by resource professionals using accepted protocols and provides both qualitative and quantitative baseline information valuable in the development of visitor use and travel management planning. No other recreation visitor use information was available for planning purposes.

17(190)
Comment: Allow[ing] overnight vehicle based camping (including RV) at approximately 100 sites." We need to ensure the BLM prohibits people from dumping their septic tanks in the Monument. We need to demand that no RV camp is allowed within two miles of any residence just to be sure.
Response: Current BLM regulations prohibit dumping of septic/sewage tanks on public lands (43 CFR 8365.1-1), and this will continue to be prohibited. The location of sensitive areas, including residences, is and will be a factor in designating the campsites for public use. By restricting camping to specific locations, certain impacts may become concentrated, as noted in the Draft RMP/EIS, but BLM will be able to better enforce restrictions on camping in an effort to minimize the potential impacts camping could have on monument objects (e.g., enforce group size and/or campfire restrictions). The potential sites where BLM would allow vehicle-based camping have been included on Map 2-13.

17(193)
Comment: Pima NRDC –
Page 2-62 Table 2-14, Management Alternatives for RECREATION
Decisions for Management Actions, allowable uses and Use Allocations.
Item 10. CAMPING
"Allow overnight vehicle based camping (including RV) " at approximately 100 sites."
We recommend the BLM avoid selecting site locations arbitrarily but instead plan in cooperation and coordination with the residents and landowners, the grazing permittees, the NRCS, the Pima NRCD, the Arizona State Land Department, and the Arizona Game and Fish Department. A poor site selection could destroy or disrupt the management a well-functioning plant community.

Response: BLM appreciates the concerns of the Pima NRDC. BLM will consider vegetation and other resource values and exercise careful interdisciplinary review and management judgment when selecting camping sites within IFNM.

17(194)
Comment: Recommendation: BLM should prohibit camping and campfires from the Waterman Mountains VHA in order to protect the Nichols Turk's Head Cactus, a Monument Object.
Response: BLM has considered and analyzed in Alternative B prohibiting camping and campfires (except charcoal and camp stoves) in the Waterman Mountains VHA. The proposed alternative, Alternative C, would allow vehicle-based camping in the Waterman Mountains VHA at identified sites that would be located to avoid impacts on resource values, and vegetation. In the Proposed RMP/EIS the potential sites where BLM would allow vehicle-based camping have been included on Map 2-13. Under Alternative C, dispersed non-motorized camping (i.e., backpacking) would be allowed throughout the IFNM, including within the VHA. However, BLM would post signs and include advisories in visitor information materials to manage camping and discourage it in localized areas for resource management purposes, as necessary. If problems arise, additional action may be taken to address camping use by adaptive management response based on future conditions including restriction on camping.

17(408)
Comment: I would ask that this proposal choose the option that is most restrictive to motorized traffic and the least restrictive on shooting. This limits the areas where most recreational shooting will take place by limiting access. The reduced motorized access eliminates the other issues the come along with vehicles namely noise, trash, and overcrowding.
Response: Restrictions on motorized travel are based on access needs, resource protection needs, and resource values present in the monument as well as potential conflicts with other uses and/or users.
The most restrictive alternative with respect to motorized vehicle travel is Alternative B, while the least restrictive alternatives for shooting are Alternatives A and D, providing a range of alternatives for access and recreational opportunities. To limit motorized vehicle access, but not restrict shooting, could result in the increased concentration of uses (both motorized and non-motorized) in the areas accessible by motorized vehicles. BLM has not proposed this in the alternatives because there could be increased user conflicts and resource damage associated with this approach.

17(409)
Comment: staging areas [for equestrian use] need to be within 1/4 mile of water (stock tank).
Response: The specific siting of recreation facilities such as staging areas is an implementation-level action and would be undertaken in a subsequent planning effort. Site planning for the equestrian staging areas will consider the functional needs and requirements for staging area activities, including water, possible use of existing facilities, water rights, and new water development or filings if consistent with recreation and other management objectives. BLM owns a number of wells developed for livestock water use, and some of these wells are not presently in operation. BLM also holds water rights pursuant to State law on approximately 210 filings on impoundments, washes, and unspecified sources for livestock, wildlife, and recreation use.

17(410)
Comment: These are fragile public lands that belong to everyone. It is just not possible to let small loud local interest groups monopolize huge acreage of the Monument for selfish high impact purposes that preclude anyone else from enjoying it. Hobby ranching and offroad mayhem are two of those selfish activities.
Response: The Proclamation establishing the IFNM directs that all off-road motorized and mechanized vehicle use be prohibited, except for emergency or authorized administrative purposes. Therefore, off-road uses would not occur within the IFNM, limiting the potential impacts from such uses. Motor vehicle

use will be limited to designated routes (roads and primitive roads) where potential impacts will be manageable. The Proclamation also indicates that the laws, regulations, and policies followed by BLM in issuing grazing permits on public land shall continue to apply within the IFNM. Rather than canceling existing grazing permits, the Draft RMP/EIS considers an alternative (Alternative B) that would remove livestock grazing from the IFNM as existing permits expire. Under all alternatives, livestock grazing practices would be adjusted when necessary to comply with the Arizona Standards for Rangeland Health.

17(411)

Comment: The Department continues to be concerned with the lack of specific national or state guidance and/or policy from the Department of Interior regarding how the new market-based recreation program or Recreation Opportunity Spectrum (including Recreation Management Areas and Zones) and other allocations (i.e., areas managed for wilderness characteristics) will affect public recreational opportunities and Department wildlife management activities. These resource allocations are being used either separately or concurrently within the same plan and across planning areas without clear guidance or policy that outlines how decisions will be made after allocations are in place, and/or how those decisions would be implemented on the ground. Thus, we are unable to adequately assess the impacts to fish and wildlife, their habitats, and the Department's ability to manage wildlife and wildlife-dependent recreation. We believe these uncertainties will lead to situations where individual managers may interpret decisions differently, creating inconsistencies in administration and coordination, ultimately impacting the Department's mission and authority across the state. The Department advises against applying allocations where overarching direction is not available. Additionally, we recommend that specific language be included within the plan to clarify how decisions should be implemented and how these decisions may affect other resources or uses. The Department further urges that the impact analysis consider the full range of possible implementation decisions in the absence of specific guidance and policy.

Response: The recreation management strategy for the monument is explained in the RMP. Management strategies are identified to meet the needs of the local planning area, based on applicable national and State-level guidance. National and State guidance does currently exist, for example, in the recreation and visitor services section of Appendix C in the Land Use Planning Handbook; IM No. 2006-060; IM No. AZ 2005-007; BLM's Experience and Benefit Checklist; and other documents. In addition, the BLM has provided training for specialists at course "Recreation Planning: Effective Engagement in BLM's Land Use Planning Process," which focuses on how to develop the recreation and visitor services component of a land use plan, primarily SRMA/RMZs. Supplemental guidance (a unified strategy, a handbook, a national visitor survey) is in the development stages. Given the guidance and training currently available, the inclusion of the recreation-market-based format and ROS in land use plans under development is realistic and timely. ROS is not new to the BLM (see BLM Manual Section 8310).

With respect to the RMZs and areas managed for wilderness characteristics, BLM has described in the alternatives how these areas would be managed by VRM and route designations, as well as management prescriptions for soil and water, vegetation, wildlife and wildlife habitat, special status species, fire ecology and management, and cultural resources. These designations and management guidelines are described in the RMZ objectives and prescriptions generally would apply throughout the IFNM.

The lack of more national guidance does not negate the management scenarios portrayed in the plan. Each RMZ has a focused, measurable objective; a clearly stated set of experience and benefits that are targeted; and prescribed settings in which the recreation activities would occur. The BLM produce recreational opportunities primarily by managing the activities and the settings. Garnering experiences and benefits is up to the visitor.

Agency effectiveness in producing recreational opportunities will, by the objective date listed, be measured by asking users via survey, the degree to which they realized the targeted benefits. Typically, as stated, agency success would be accomplished if the experience provided "no less than 75 percent of responding visitors and affected community residents at least a 'moderate' realization" of the benefits. The sections on recreation management, recreation marketing, recreation monitoring, and recreation administration provide a basic set of parameters (an implementation framework) that portray the types of

actions that would be needed to achieve the objectives. Other resource uses and project proposals would be evaluated through NEPA in light of RMZ settings and the ability to produce recreational opportunities.

17(413)
Comment: In addition, BLM should change the description of the Roaded Natural ROS (3.2.3.1, page 3 47) to eliminate "wood gathering" from the list of activities associated with this ROS, as this activity is prohibited in other sections of the plan (Table 2-14).
Response: The description of "roaded natural" on page 3-47 describes the inventory of existing conditions on BLM land; it is not a designation denoting what is allowed and/or prohibited. Although wood gathering was omitted from the list of activities allowed within a roaded natural RMZ, within Section 3.2.3.1 of the Final EIS, the following note was added: "Wood gathering for campfire use while camping on public lands is generally allowed on BLM land unless specifically prohibited." The RMP is the basis for restricting this activity as deemed necessary to protect monument objects.

17(414)
Comment: I also strongly oppose limiting of group sizes relating to camping on the IFNM that is proposed on Page 2-53 through 2-59 including Table 2-14: Resource Management Alternative for Recreation. Limitations like this will greatly hinder volunteer activities that are conducted in conjunction with the conservation organizations, fellow public land agencies, as well the AZGFD with projects such as wildlife water catchments, habitat improvement projects, etc. It would be more productive to wildlife and habitat conservation as well those that chose to recreate on the IFNM to not impose restrictions on conservation or recreations activates.
Response: The proposed recreational group size limitations apply to recreational activities, and do not automatically apply to volunteer group project activities, which are considered administrative use. The group size limitations are intended to minimize the potential for adverse impacts on resources and other users of the IFNM from large group recreational activities including camping. Existing recreation sites/activity areas are small, with limited capacity for one time use, and opportunities for large group gatherings is limited, and potential expansion of their foot print over time from large group use could cause damage to Monument resources. Volunteer projects involving groups will be conducted according to project plans and service agreements that will be designed to minimize new disturbance or damage to resources. Projects such as cleanup of trash or removal of invasive vegetation can be considered administrative actions and could be accommodated, as necessary and appropriate for the monument. Volunteer service projects will need to be designed with consideration for the purposes of the monument and its plan. Additional information has been provided in Appendix D.

17(415)
Comment: In addition, BLM should locate designated campsites away from areas infested with buffelgrass and other flammable vegetation to reduce the risk of unintended fire.
Response: Though BLM has identified potential sites where overnight vehicle-based camping would be allowed based on where campsites were established by users over time (i.e., existing locations) (Map 2 13), dispersed non-motorized camping (i.e., backpacking) would be allowed throughout the IFNM under Alternative C, requiring low-impact camping methods. However, BLM would post signs in sensitive areas to restrict camping in localized areas, as necessary. Sites with high fire hazard may be closed, or seasonal fire restrictions imposed.

17(416)
Comment: Firewood Gathering
Table 2-14 (page 2-61) allows wood campfires only when firewood is from a non-monument source. Given the high unlikelihood that recreational users would carry firewood, along with their other equipment, into primitive areas, wood campfires should be prohibited in Primitive Areas. This would assist BLM in reducing the potential for illegal firewood collection.

Response: Visitor information will alert visitors to the firewood restriction, and promote use of alternative sources of heat for warmth and cooking among other low-impact camping practices.

17(417)
Comment: In addition, BLM should monitor the vegetation near designated campsites and close campsites if they are unable to manage the collection of firewood in those areas.
Response: BLM will set up a campsite monitoring system to establish baseline conditions for key indicators (including soils, vegetation, and others, at designated sites and those not designated for resource protection reasons. Sites will be checked for change over time, and if unacceptable changes or trends are detected, adaptive management response will be taken to rectify, mitigate, or minimize potential impacts on sensitive natural and cultural resources in the IFNM (as noted in Appendix D). This could include the closure of campsites for rehabilitation if resource damage occurs.

17(418)
Comment: The BLM should also include campfire safety and etiquette materials in their visitor etiquette outreach materials.
Response: Comment noted. BLM has added an administrative action to Appendix D to include distribution of campfire safety and etiquette in its outreach materials, along with other visitor-related concerns.

17(672)
Comment: Draft Goals, Objectives, and Alternatives - Recreation
Decisions for Management Actions, Allowable Uses and Use Allocations
In general a number of the alternatives for recreation require passage across SBM lands. SBM has issued a number of right of ways or easements to various users for commercial or industrial uses. BLM must either revise its plans or secure easements across private property.
Response: BLM has attempted to make clear that all land use allocations, designations, and management prescriptions apply only to public lands administered by the BLM. This note has been included on the maps depicting alternatives. If, during implementation of a particular alternative, it is necessary to acquire an easement or right-of-way from the State or a private landowner, BLM would initiate that process.

17(774)
Comment: We also request hunting be prohibited within ¼ mile of livestock or wildlife water sources so as to protect the physical integrity as well as the intended purpose of infrastructure that was financed through the Arizona Game and Fish Department or the USDA EQIP program.
Response: AGFD is responsible for enforcing hunting laws and regulations. According to the "2008-09 Arizona Hunting and Trapping Regulations" available on the AGFD website, it is illegal to camp within 0.25 mile of livestock and/or wildlife watering sources (A.R.S. 17-308), and sportsman's ethics include "Do not hunt near livestock waters where livestock is nearby; harassment of livestock is illegal." However, tree stands and blinds near wildlife waterholes are legal tools and the regulations do not prohibit hunting within 0.25 mile of a wildlife water source.

17(775)
Comment: When the question was asked, "Why not use the existing area that is currently being used?" The answer was that the use of the area would cause continued erosion and that BLM was mandated to protect the resources of this area. However, on page 2-62 #11, allowing overnight, dispersed, nonmotorized camping throughout the monument unless camping in an area is specifically prohibited for protection of resource values (e.g., signed sensitive closure areas, which could vary over time). This type of camping can produce as much destruction to an area as target shooting.
Response: Any human activity potentially may contribute to resource damage, whether inadvertent or intentional. However, our observations conclude that resource damage associated with recreational

shooting is typically very intensive and tends to result in more resource damage than that observed from camping, particularly dispersed, non-motorized camping which is expected to be of light intensity,

17(SR74)
Summary Comment: Noisy, land-disturbing activities such as target shooting and motorized vehicle use should be restricted in the IFNM. The IFNM was not established to provide recreational opportunities; BLM should demonstrate that any authorized recreational activities will not adversely affect objects of the IFNM. The monument should be reserved for quiet, low-impact activities that support the Proclamation's goal to protect the IFNM.
Summary Response: Although Presidential Proclamation 7320 does not mention recreation, BLM's management of public lands, including those in the IFNM, is guided by the Proclamation, and "pursuant to applicable legal authorities, to implement the purposes of this proclamation." BLM's primary guidance for management of public land comes from FLPMA, which requires that "management be on the basis of multiple use and sustained yield." FLPMA also requires that "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... and that will provide for outdoor recreation and human occupancy and use." The Proclamation and FLPMA have guided BLM's development of proposed management for the IFNM to protect monument objects and accommodate multiple uses.
BLM has analyzed the alternatives presented in the Draft RMP/EIS and assessed the impacts that recreation would or could have on objects of the IFNM. Under Alternative C, in the Proposed RMP/EIS motorized vehicle use would be limited to approximately 124 miles of designated routes, and recreational shooting would not be allowed. This would provide opportunities for quiet recreation in the IFNM.

17(SR105)
Summary Comment: Do not limit camping to designated sites only. One hundred sites are not adequate to accommodate the level of hunting opportunity offered to the public and may not allow AGFD to meet management objectives using current hunt structures. Limitations like this will greatly hinder volunteer activities that are conducted in conjunction with the conservation organizations and fellow public land agencies, as well AGFD, for projects such as wildlife water catchments, habitat improvement projects, etc. Dispersed camping should be allowed monumentwide.
Summary Response: Dispersed vehicle camping will continue to be allowed in the monument, but it will be limited to those sites that have been designated for that purpose. Designated sites will be provided throughout the monument to facilitate and manage dispersal of visitors and allow camping near hunting grounds throughout the monument. Camping activity can result in localized impacts from vehicle parking and maneuvering and from persons engaging in ancillary activities. Allowing camping at locations up to the user's discretion could lead to use on sensitive grounds, and result in inadvertent damage and proliferation of related impacts. The designated, dispersed campsite system for the monument will include those campsites that have become established over time by users and have continued to receive use, or that can be reactivated to be used, if they do not present a risk of damage to resource values at the sites (based on site surveys to ensure resource protection). The system will be adjusted over time through adaptive management response as needs change, as long as new sites are suitable and not likely to result in damage to monument resources based on site-specific factors. BLM has determined through interdisciplinary review and analysis of hunting data that the RMP would provide sufficient opportunities for camping (including campsites for hunters). By restricting camping to specific locations, certain impacts may become concentrated, as noted in the Draft RMP/EIS, but BLM will be able to better enforce restrictions on camping in an effort to minimize the potential impacts camping could have on monument objects (e.g., enforce group size and/or campfire restrictions). The potential sites where BLM would allow vehicle based camping vary by alternative and are included on Maps 2-12 through 2-14.

17(SR278)
Summary Comment: There should be additional area in the IFNM allocated for primitive recreation experiences, including the area from the northeastern foothills of the Silver Bell Mountains to the gas pipeline.
Summary Response: The BLM intends to provide for primitive recreation in the more remote and less developed areas that have a greater inherent potential for providing a high quality experience. Certain areas do not have the potential to provide a primitive recreation experience due to existing land uses. The natural gas pipeline, for example, could result in uses that could conflict with the primitive setting and detract from the experience because visitors could view and/or hear equipment, vehicles, and/ or maintenance crews, reducing the potential for a primitive experience. In addition, there is a main access road that further reduces the potential for primitive recreation in that area.

17(SR412)
Summary Comment: Without clear guidance or policy that specifies how decisions will be made or implemented on the ground, conflicts may arise when managing via ROS or market-based strategies. For example, using ROS criteria (especially primitive RMZ objectives) could limit or conflict with wildlife management projects/facilities, volunteer activities, and hunting by exceeding recreation management outcomes in regards to group size, contacts, naturalness, evidence of use, facilities, and remoteness. BLM should identify how such conflicts would be resolved and provide further guidance on how ROS will be implemented on the ground.
Summary Response: The Final RMP is the vehicle providing guidance for implementing the decisions made therein. Any proposed activity will be evaluated according to the RMP management framework, goals and objectives, and proposed activities will be either approved as proposed, modified, or denied depending on their nature and requirements, impacts, or conflicts. It is anticipated that most wildlife management activities will be accommodated, unless they violate provisions of the management plan or other legal requirements. Cooperative wildlife management activities will normally be exempt from some restrictions placed on public use, but adequate safeguards to protect resource values on the monument would need to be implemented. Wildlife management will be required to be in conformance with the plan. With respect to the RMZs (including the primitive RMZ), BLM has described in the alternatives how these areas would be managed by VRM and route designations, as well as by management prescriptions for soil and water, vegetation, wildlife and wildlife habitat, special status species, fire ecology and management, and cultural resources. These designations and prescriptions generally would apply throughout the IFNM. Further, it should be noted that the RMP is intended to be a programmatic document to guide future planning and implementation activities; it cannot address every situation that could arise during the life of the RMP. However, as implementation-level activities are considered, site-specific analyses and documentation (e.g., NEPA compliance) would be completed. Refer also to summary comment and response 17(411) for additional information regarding recreation management.

17(SR425)
Summary Comment: There is not an evident protocol for calculating human carrying capacity and responding in ways that manage that activity so that it conserves into the future natural system values necessary to support future life with quality.
Summary Response: BLM agrees that there is not one evident protocol for determining human carrying capacity. BLM will use adaptive management strategies to adjust management as conditions and demands on resources change within the IFNM; these strategies will help BLM manage in ways to conserve the objects of the IFNM, consistent with the values of the public as expressed in the vision for the monument.

Category 18: Shooting

18(157)
Comment: The environmental section cites firearms as an ignition source. They are not! I saw nothing about banning smoking, matches, road flares, fireworks, flammable liquids, combustion engines ...
Response: The BLM Salt Lake Field Office has spearheaded an interagency fire prevention campaign aimed at decreasing human-caused wildfires started by target shooting (2004). Wildfire statistics report that nearly one-fourth of Salt Lake District's human-caused wildfires occurred when people were target shooting and sighting-in firearms. Target shooting sparked a 1,781-acre wildfire on the northern end of the Stansbury Mountains in Tooele County, Utah [Deseret News (Salt Lake City), June 18, 2007]. Though the risk may be minimal in the IFNM for this to occur, such potential does exist. The prohibition of other potential ignition sources during times of high fire danger is a normal procedure.

18(905)
Comment: Is it not possible that the large number of Illegal Alien traffic may account for one degree or another of the debris found at this particular location (I phrase it like this because I don't know the nature of the debris that is motivating this movement. Obviously, washers and dryers would be the result of our own citizens. However, diapers, water containers, and the like would indicate the likelihood of illegal aliens being the cause.) If it is, in fact, migrating foreign nationals why would you not prompt the appropriate government agency to cooperate with you in your mission of keeping our country clean by providing more resources to stop illegal immigration.
Response: BLM coordinates with various agencies, including, but not limited to, the U.S. Border Patrol, AGFD, Pima County Sheriff's Department, and Tohono O'odham Nation for law enforcement and resource management in the IFNM.

18(906)
Comment: BLM considers no management option for target shooting except prohibiting it unlike other critical management issues, such as land tenure, where a host of affirmative management actions are contemplated. (See 2-67 to 2-69). Similarly, public utility corridors would be actively managed (2-69-70). Remarkably, although target shooting is a higher preference for area users than horseback riding, (3-47), active management is assumed for equine use, in contrast to the proposed bans on target shooting (2-63). Worse, the BLM contemplates active management to remove shooting backstops (4-15), while completely disregarding active management of any actual shooting problems or enhancing opportunities for shooting. I am left with the sense that the analysis is not just flawed, but seriously biased against shooters.
Response: BLM has revised the Draft EIS and completed an analysis of specific areas where recreational shooting could be allowed; a summary of the analysis is included in Appendix I. Two sites (Avra Hill and Cerrito Represo) were identified as moderately suitable as a site-specific area for recreational shooting and were assessed for environmental effects in Chapter 4.

18(907)
Comment: As hunters, we do clean-up on state and private lands, due to the destruction and use by the drug cartels and illegal entrants. You, as a government agency, are undermanned and under-funded to provide this service.
Response: Keeping the IFNM clear of refuse left by users and from illegal activities is a constant challenge, and BLM appreciates those users who voluntarily clean up public lands. In addition to those efforts, BLM conducts volunteer cleanup projects and administers various agreements with the purpose of clearing the land of garbage. While it is difficult to keep up with the amount of garbage that is dumped on the IFNM, BLM will continue to rely upon volunteer and other efforts to address this problem.

18(908)
Comment: There is no reason I could find for banning/restricting target shooting in the Natl. Monument. The Antiquities Act and Clinton's order designating this monument do not ordain or even imply anything of the sort.
Response: While the Proclamation and the Antiquities Act provide specific direction on some uses of public lands, they primarily establish the management purpose of the monument and provide general provisions to meet that purpose. It is the responsibility of the BLM to identify and implement appropriate management actions consistent with the provisions of the Proclamation and the guiding principles of FLPMA. While target shooting has been identified as a legitimate use of public lands in general, it is an activity that can be restricted based on the management goals and objectives for specific BLM lands. The effects of target shooting on monument objects and other resource uses are disclosed in Chapter 4 of the Draft RMP/EIS.

18(SR1)
Summary Comment: IFNM lands are important to our activities; therefore target shooting, bird dog training, and recreational shooting should be allowed.
Summary Response: BLM has proposed restrictions on target shooting in the IFNM due to the effects this activity has on monument objects and resources, and in consideration of the safety of monument visitors. BLM understand that there is a demand for target-shooting areas in the Tucson region, and prohibitions on this activity in the IFNM would displace some shooters. However, the vast majority of BLM lands outside of the IFNM would remain open to shooting. Also see summary comment and response 18(SR20) for information on regional efforts to provide shooting opportunities.
While recreational target shooting would be prohibited under the Proposed RMP, hunting in accordance with AGFD regulations would be allowed, including hunting with dogs.

18(SR2)
Summary Comment: The IFNM should remain open to recreational shooting.
Summary Response: In developing the RMP for IFNM, the BLM is responding to the requirements of the Presidential Proclamation and FLPMA. Both mandate the protection and preservation of resources within the Monument.

18(SR8)
Summary Comment: There are sufficient laws and regulations regarding use of public land (e.g., recreational shooting, OHV use) that make it a crime to harm the land; the RMP should not introduce new law and regulation. People who break the law will continue to break the law. Rather than restricting use of the land, existing laws should be enforced. For example, misuse of firearms, fire hazards, littering, etc. require enforcement and heavy penalties.
Summary Response: Approval and implementation of the RMP will not result in passage of new laws or regulations. The purpose of the RMP is to establish a framework for managing the land, resources, and uses within the monument as established in the Proclamation and in accordance with FLPMA. Under this framework, BLM manages the land and enforces current laws, regulations, and policies. The decisions within the RMP define what types of activities or uses are allowed or prohibited within all or part of the monument. Enforcement activities are a component of BLM's management but cannot be used as a substitute for proactive land management, just as management decisions are not made as a substitute for law enforcement activities. Also note that legal uses of public lands can inadvertently cause resource damage, depending on the intensity of the use and other factors, which is one of the primary reasons why BLM develops allowable use restrictions and other management prescriptions.
Law enforcement within the monument requires and includes coordination with other agencies, and is heavily influenced by current staffing and funding. Employing additional law enforcement personnel is a question of funding appropriated by the U.S. Congress, and congressional funding legislation is beyond the scope of this RMP/EIS. Rather than making assumptions regarding future levels of congressional

funding, the RMP/EIS attempts to address resource needs and identify actions to protect those resources, which can have the effect of making existing law enforcement resources more efficient by simplifying regulations. This strategy is intended to help protect natural and cultural resources and enables BLM rangers to devote more of their time to dealing with illegal dumping and other law enforcement issues.

18(SR12)
Summary Comment: Prohibiting recreational shooting will reduce hunting opportunities and be harmful to land and game management.
Summary Response: None of the alternatives presented restrict the use of firearms to hunt game when conducted in accordance with AGFD hunting regulations.

18(SR19)
Summary Comment: If recreational shooting is banned, then next the use of any/all weapons for protection against wild animals, illegal immigrants, criminals, or terrorists will be banned in the IFNM.
Summary Response: The proposed restriction on recreational shooting sets no precedent for the discharge of firearms related to law enforcement, hunting, and personal protection, and does not prohibit visitors to the IFNM from possessing firearms . These activities and their effects are clearly distinct from recreational target shooting, and the RMP in no way implies that they will be banned in the future. Furthermore, Section 2.3 of the Draft RMP/EIS states that the alternative selected by the BLM for management of the IFNM must heed and be in accordance with all relevant laws, regulations, and policies of other government entities with jurisdiction over the IFNM. These decisions would apply only to BLM-administered land within the boundaries of the IFNM, and not to areas outside the IFNM.

18(SR20)
Summary Comment: Recreational shooters are increasingly losing locations to shoot, and banning recreational shooting in the IFNM would create a hardship on the sportsmen in Arizona. IFNM provides plenty of wide open spaces with lots of available backstops to use for target shooting. Shooters are steadily losing locations where they can train themselves and future generations in proper gun use. Open areas also provide space for shooting activities that ranges cannot accommodate.
Summary Response: BLM understands that there is a public demand for recreational shooting areas in the Tucson Basin. Early recognition of this issue resulted in a basinwide collaborative approach to address it comprehensively. In 2002, the BLM Tucson Field Office asked the U.S. Institute for Environmental Conflict Resolution to conduct a collaborative process addressing recreational shooting issues. Existing opportunities for recreational shooting were identified during this process, and proposed additional facilities were also discussed (see Final Report: Tucson Basin Shooting on Public Lands Workshop Project, June 2006, available online at http://www.ecr.gov/pdf/Tucson_Basin_Final.pdf).
After the IFNM was established in 2000, BLM has been and continues to be engaged in efforts with public and private entities to identify alternative sites where target shooting can take place in dispersed, undeveloped settings. Ongoing efforts include negotiations with the ASLD, AGFD and other non-governmental organizations to identify shooting areas near the IFNM. Also note that this RMP regulates recreational shooting only within the IFNM, and public land administered by BLM outside the IFNM boundary would not be affected by decisions in this RMP. A considerable amount of BLM-managed lands outside of the IFNM in the general region would remain available for shooting. These lands contain a number of sites regularly used for shooting in undeveloped settings. Also see also comment and response 18(SR901) regarding hunting in the monument.

18(SR21)
Summary Comment: There is more than enough land on the 128,000-acre IFNM for all recreation types. There must be a way to incorporate recreational shooting into part of it (for example, by designating certain areas for certain uses). If not, the BLM should provide for an alternative site for the recreational shooting it is displacing.

Summary Response: While target shooting is generally a legitimate use of public land and an activity that has occurred for many years on the land now encompassed by IFNM, the continuation of dispersed target shooting as well as the establishment of designated shooting areas within the IFNM presents some difficult management issues in terms of the compatibility of this use with the provisions of Presidential Proclamation 7320. That Proclamation effectively charged land managers with the proper care, protection, and management of monument objects. While the Proclamation did specifically prohibit some destructive uses, such as off-road driving and mineral extraction, determination of allowable uses was primarily left to be addressed through the land use planning process.
During the land use planning process, the entire IFNM was analyzed to identify the most appropriate locations for continued target shooting. The analysis process and results are described in Appendix I. Based on the criteria that were used in this analysis, which were tailored to IFNM's protected status as a national monument, only 2,965 acres of the 128,000 acres of public land were not eliminated by preliminary screening criteria. The preliminary criteria excluded (1) areas with a significant presence of monument objects or high natural and cultural resource sensitivity, (2) areas in which discharge of firearms is not allowed based on existing laws and regulations, (3) areas with a high sensitivity to shooting noise, and (4) areas without suitable terrain for an existing natural backstop. Based on further field analysis of the 2,965 acres, only two areas, comprising a total of approximately 629 acres, were found to be moderately acceptable for shooting activity. Alternative D includes establishing designated recreation shooting areas in these two locations and the environmental effects are assessed in Chapter 4. Other current and historic recreational activities were found to be more compatible with the care and protection of those objects for which the IFNM was established, or were otherwise resource-dependent activities, such as sightseeing or camping. More compatible recreational opportunities were proposed, with limitations. After the IFNM was established in 2000, BLM has been and continues to be engaged in efforts with public and private entities to identify alternative sites where target shooting can take place in dispersed, undeveloped settings. Ongoing efforts include negotiations with the ASLD, AGFD and other non-governmental organizations to identify shooting areas near the IFNM.

18(SR22)
Summary Comment: Do not ban recreational shooting, because shooting is a traditional activity on the IFNM. It was not causing a problem before, so if recreational shooters just follow commonsense rules, shooting should not be banned now.
Summary Response: Recreational target shooting in the IFNM has caused damage to resources. BLM has recorded extensive damage to saguaro cacti, ironwood trees, petroglyphs, and a variety of other biological, cultural, and geological resources from target shooting. Furthermore, Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM. That Proclamation effectively charged land managers with the proper care and management of those objects to be protected. Because of the intensity at which target shooting occurs on the monument, it is causing significant damage to resources and has therefore been shown to be largely incompatible with the purposes of the IFNM. BLM believes that these activities do not serve to protect the objects of scientific interest for which the IFNM was designated. In addition, shooters often use discarded computers, televisions, water heaters, and other items for target practice. Since 2001, the BLM has organized 15 trash cleanup events inside the monument that collected nearly 30,000 pounds of garbage at shooting sites, and this does not include the thousands of additional pounds of shooting debris that have been collected by the Town of Marana per an assistance agreement with BLM. In terms of safety, numerous close calls from indiscriminate and unregulated shooting activity have been reported to BLM by nearby residents and visitors, as well as extensive property damage.

18(SR23)
Summary Comment: Don't punish responsible shooters who clean up after themselves by banning shooting on the entire IFNM because of the irresponsible few who leave their trash and shoot

indiscriminately. Deal with the abusers. Banning the law-abiding won't keep criminals from destructive behavior.
Summary Response: The decision to regulate recreational shooting is not an effort to punish any single user group. Rather, it is an effort to protect the objects of scientific interest that exist within the monument. While unlawful shooting behavior results in significant damage and problems within the IFNM, extensive damage is also caused by the sheer number of shooters who concentrate in certain areas of the monument, and who may be following applicable laws. Therefore, problems associated with target shooting would not be eliminated only by "dealing with" the abusers. BLM rangers will continue to patrol the IFNM and continue to work with local authorities and user groups to enforce applicable laws, regulations, and policies.

18(SR24)
Summary Comment: Do not ban recreational shooting on the IFNM, because taking guns off this land will increase the lawlessness there. Having extra eyes (from the recreational shooters) on IFNM helps catch and prevent lawbreakers and illegal immigrants from using it.
Summary Response: Having recreational shooters present on the IFNM may or may not influence the occurrence of illegal activities. The BLM has no information to suggest that prohibiting recreational shooting in an area would increase illegal activities. In contrast, BLM has responded to numerous reports of suspicious or illegal activities associated with target shooting, including confrontations between users, property damage, and illegal dumping. Also, it should be noted that the BLM does not advocate that any member of the public enforce Federal, State, or local laws, or any provision of the RMP. In addition, the RMP does not vest the public with any law enforcement, management authority, or responsibility, nor does it imply those responsibilities. The BLM rangers and other Federal, State, and local law enforcement agents who patrol the IFNM will enforce laws and provisions of the RMP once approved. Refer also to summary comment and response 18(SR 23) for additional information regarding recreational shooting.

18(SR25)
Summary Comment: Shooting is as legitimate a use of public land as any other recreational activity and should be allowed on the IFNM. It would be discriminatory to shooters not to allow it.
Summary Response: The recreational shooting restriction has been proposed as part of BLM's effort to manage resources and uses of IFNM lands in a way that meets both guidance of the Presidential Proclamation 7320 (Appendix A) and the mandates of FLMPA. BLM developed the alternatives in the RMP, particularly the proposed alternative, to specifically address management of objects of scientific interest within the monument while allowing for certain traditional uses that do not conflict with protection of those objects. Restrictional shooting poses concerns related to resource damage, property damage and public safety, and presents unavoidable conflicts with achieving resource protection in the Monument.

18(SR26)
Summary Comment: Recreational shooting disrupts other recreational activities, such as solitary contemplation, nature viewing, bicycling, horseback riding, hiking, and birding. While some shooters are responsible, others are not, and both damage the monument.
Summary Response: The BLM has considered and analyzed continuing to allow recreational target shooting (under Alternative A) prohibiting recreational target shooting (Alternatives B and C), and allowing recreational target shooting in designated areas within IFNM (Alternative D). Effects of each alternative are addressed in Chapter 4.

18(SR27)
Summary Comment: If recreational shooting is banned on the IFNM, it will move to other, less safe areas that are perhaps close to residential areas or other desert areas used for multiple recreational purposes.

Summary Response: BLM acknowledges that banning recreational shooting within the IFNM could result in displacement of this activity to new areas outside the Monument, and/or creation of new informal shooting sites with potential for impacts on various resources, uses, and safety. These impacts are analyzed in Chapter 4 of the Draft RMP/EIS. However, Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM, and effectively charged land managers to protect those objects. The standard for protection on Monument lands is greater than for other BLM lands. The BLM remains willing to work with others on identifying and providing for locations outside Monument lands to provide opportunities for recreational shooting,

18(SR28)
Summary Comment: Do not ban recreational shooting in the IFNM, because it is a traditional use of public land and irresponsible shooting accounts for very little resource damage and few safety issues, which do not justify banning shooting entirely.
Summary Response: Recreational target shooting in the IFNM has caused damage to resources. BLM has recorded extensive damage to and destruction of saguaro cacti, ironwood trees, petroglyphs, and a variety of other biological, cultural, and geological resources from target shooting. Furthermore, Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM. That Proclamation effectively charged land managers with the proper care and management of those objects to be protected. Because of the intensity at which target shooting occurs on the monument, it is causing significant damage to resources and has therefore been shown to be largely incompatible with the purposes of the IFNM. BLM believes that these activities do not serve to protect the objects of scientific interest for which the IFNM was designated. In addition, shooters often use discarded computers, televisions, water heaters, and other items for target practice. Since 2001, the BLM has organized numerous trash cleanup events inside the monument that collected more than 30,000 pounds of garbage at shooting sites, and this does not include the thousands of additional pounds of shooting debris that have been collected by the Town of Marana per an assistance agreement with BLM. In terms of safety, numerous close calls from indiscriminate and unregulated shooting activity have been reported to BLM by nearby residents and visitors, as well as extensive property damage. Refer also to summary comment and response 18(SR 19) for additional information on recreational shooting.

18(SR29)
Summary Comment: Recreational shooting should not be banned on the IFNM, because the monument is not currently within or adjacent to an urban setting. Additionally, the area will never be as frequently visited as the other national parks and monuments in Arizona; therefore, banning shooting for the sake of public safety is unreasonable.
Summary Response: While the IFNM is primarily located in a rural setting, development within and adjacent to its boundary increases the likelihood of urban-interface issues, including disturbance from target shooting. In addition to the growing residential development on the eastern boundary of the IFNM, several private inholdings with year-round occupancy are located within the IFNM, including a developed community. Beyond public safety considerations, the restrictions proposed for target shooting under Alternative C in the Draft RMP/EIS also would protect the natural and cultural resources in the planning area. Presidential Proclamation 7320 establishes these resources as the dominant reservation of public land in the IFNM.

18(SR30)
Summary Comment: Sensitive habitat areas need to be posted as “no shooting areas” with regular patrols to enforce the restriction.
Summary Response: The Proposed RMP would prohibit recreational shooting throughout the IFNM, including the Waterman Mountains VHA and the Desert Bighorn Sheep WHA. Implementation-level

actions such as posting signage and patrolling the monument would occur, as necessary, upon approval of the Final RMP.

18(SR36)
Summary Comment: BLM provides no basis beyond subjective statements to support a shooting ban. Specific examples of the negative impacts of shooting on the IFNM are needed if the BLM is to justify its proposed recreational shooting ban.
Summary Response: BLM has conducted additional analysis on the opportunities to offer safe recreational target shooting in specific areas of IFNM that would not conflict with BLM's responsibility to protect the objects for which the monument was established. Based on the analysis, which is summarized in Appendix I, there were only two moderately suitable sites, and it was determined that concentrating all target shooting in the two locations would result in significant resource impacts and public safety would likely be compromised. The effects of target shooting on the IFNM are assessed in Chapter 4 for those resources that would be affected. The conclusions are based upon a consideration of available information using best professional judgment.

18(SR37)
Summary Comment: The most common hazardous material that shooting involves is lead, which needs to be ingested to be harmful. Almost all of the lead created by shooting is in bullet-sized amounts that are not likely to be ingested by the public. There is a very limited hazardous materials risk to the public. Recreational shooting should not be banned on the IFNM for hazardous materials reasons.
Summary Response: The concern regarding lead as a hazardous material lies primarily in the fact that it presents a toxic hazard to birds and other animals that may ingest it. There are two types of lead poisoning, primary and secondary. Primary lead poisoning occurs with the direct ingestion of lead shot either as food or while searching for grit (small stones) for digestion. Many eagles and other predatory or scavenging birds also suffer primary lead poisoning by consuming lead shot and bullets embedded in tissues of game animals killed or wounded with lead ammunition. Secondary lead poisoning occurs when predators such as eagles or other raptors eat the contaminated tissues of birds that have died from lead poisoning.

18(SR38)
Summary Comment: The wording of the Draft RMP/EIS is too vague and can be interpreted as a total ban on any firearm use other than hunting with a license. The BLM should clarify the Final RMP/EIS so that hunting and carrying either an open or concealed weapon as well as the discharge of any firearm in self-defense is specifically allowed to continue.
Summary Response: Table 2-14 states specifically that the use and discharge of firearms would be permitted in accordance with AGFD hunting regulations. Section 2.3 states that the alternative selected by the BLM for management of the IFNM must heed and be in accordance with all relevant laws, regulations, and policies of other government entities within jurisdiction over the IFNM.

18(SR39)
Summary Comment: Ranchers must have the freedom to discharge firearms for humane purposes to dispatch sick or injured livestock they own within the monument. Recreational equestrians must have the same freedom to shoot their own injured horses.
Summary Response: The Proposed RMP would not prohibit the use of firearms by individuals to dispatch their own injured livestock for humane purposes.

18(SR90)
Summary Comment: Closing access to public lands for target shooting has an adverse effect on hunting because the opportunity to hunt safely and enjoyably is restricted.

Summary Response: Under Alternative C, BLM would permit hunting in the IFNM in accordance with AGFD regulations. In addition, Section 2.3 states that BLM management of the monument must heed and be in accordance with all relevant laws, regulations, and policies of other government entities with jurisdiction. Sighting a rifle is a necessary part of hunting and sighting of firearms in the monument would be permitted and would correspond to AGFD seasons. The sighting of inappropriate types firearms outside AGFD seasons would not be permitted in the monument.

18(SR156)
Summary Comment: If recreational shooting were to be prohibited, then next hunting would be prohibited in the IFNM.
Summary Response: All alternatives in the Proposed RMP would allow hunting throughout the IFNM in accordance with AGFD regulations. While both target shooting and hunting involve the use of firearms, these are distinct activities that have very different effects on the ground and on management. Thus, the rationale and criteria used to analyze the effects of target shooting do not generally apply to hunting. Furthermore, managing hunting is a responsibility of AGFD.

18(SR846)
Summary Comment: Limiting recreational shooting in the IFNM will only displace adverse environmental impacts on resources and safety in areas outside the IFNM.
Summary Response: BLM acknowledges that banning recreational shooting within the IFNM could result in increased recreational target shooting in other areas outside the IFNM, with the potential for impacts on various resources, uses, and safety. These impacts are analyzed in Chapter 4 of the Draft RMP/EIS. However, Presidential Proclamation 7320 recognized the natural and cultural resources that exist in the planning area as the dominant reservation of public land in the IFNM, and effectively charged land managers to protect those objects. This same standard of protection does not necessarily apply to all BLM lands, and it may be more appropriate to focus target shooting on non-monument lands in the area.

18(SR847)
Summary Comment: Recreational shooting should be allowed in the IFNM because improved access routes are limited and the area is devoid of scenery, historic sites, or other features that would normally attract hikers, picnickers, photographers, or other recreational users. It also provides a recreational shooting area near Tucson.
Summary Response: The IFNM is visited by an array of users with a variety of purposes for their visits, as has been documented by BLM. Please refer to Appendix A of the Draft RMP/EIS for a summary of the scenic, historic, and natural features for which the IFNM was expressly designated. The BLM believes that prohibiting recreational target shooting would allow for the protection of these resources.

18(SR901)
Summary Comment: Prohibiting target shooting in all 128,000 acres is not reasonable related to the goal of preservation.
Summary Response: The entire IFNM was analyzed to identify the most appropriate locations for continued target shooting (see Appendix I). Based on the criteria that were used in this analysis, which were tailored to IFNM's protected status as a national monument, it was very difficult to identify areas that would qualify as sustainable shooting areas. Many areas that were deemed safe contained sensitive resources that could be damaged or destroyed by target shooting, and many areas with less sensitive resources were not found to have safe shooting conditions. In the end, a small fraction of land in the IFNM was found to be marginally acceptable for shooting activity; Alternative D includes designating these lands (a total of approximately 629 acres in two different areas) for recreational shooting.
While target shooting is generally a legitimate use of public land and an activity that has occurred for many years on the land now encompassed by IFNM, the establishment of the IFNM did present some difficult management issues in terms of the compatibility of certain uses with the provisions of

Presidential Proclamation 7320. That Proclamation effectively charged land managers with the proper care, protection, and management of monument objects. While the Proclamation did specifically prohibit some destructive uses, such as driving off-road and mineral extraction, determination of allowable uses was primarily left to be addressed through the land use planning process. Through this process, some current and historic uses of the area were found to pose significant threats to monument objects, including recreational target shooting, which has high potential to disturb or degrade biological and cultural resources for which the IFNM was established. Some other recreational activities were found to be more compatible with the care and protection of those objects, or were otherwise resource-dependent activities, such as sightseeing or camping, with limitations.
After the IFNM was established in 2000, BLM has been and continues to be engaged in efforts with public and private entities to identify alternative sites where target shooting can take place in dispersed, undeveloped settings. Ongoing efforts include negotiations with ASLD and AGFD to identify shooting areas near the IFNM. Also this RMP regulates recreational shooting only within the IFNM, and public land administered by BLM outside the IFNM boundary would not be affected by decisions in this RMP. Eighty-nine percent of the other 520,300 acres of BLM land administered by the Tucson Field Office is open to recreational target shooting.

18(SR902)
Summary Comment: Recreational shooting should not be banned, because curtailing a popular activity (recreational shooting) at the IFNM will result in difficult situations for BLM law enforcement personnel.
Summary Response: BLM law enforcement personnel encounter a variety of difficult situations on a daily basis in the IFNM, including dealing with illegal shooting behavior, and are trained to work under high-stress conditions. Restricting shooting on the IFNM may present new challenges for law enforcement, just as it is likely that many difficult shooting-related situations that are currently encountered would decrease. Law enforcement considerations are taken into account in all management decisions, and it is unlikely that an increase in difficult situations would occur as a result of restricting target shooting.

18(SR903)
Summary Comment: There are technologies available, such as SACON® backstops, which would reduce the environmental impacts of recreational target shooting in the IFNM
Summary Response: BLM has considered the use of various technologies on the IFNM that have the potential to reduce the environmental impacts of target shooting, including SACON®. However, constructing SACON® backstops on the IFNM would present other management problems related to current BLM policy. By constructing shooting backstops in the IFNM, BLM would in effect be developing shooting areas that would be used for that purpose only. BLM IM 2008-074 outlines BLM's policy for authorizing shooting areas, which is to convey the land to another entity, either through direct sale or through a patent issued under the Recreation and Public Purposes Act. However, the Presidential Proclamation that established the IFNM prohibits disposal of land within the monument, so conveying land for dedicated shooting areas within the IFNM is not an option. For shooting to continue in the monument and be in compliance with BLM policy, it would need to continue to be dispersed in areas with no shooting facilities or developments or in areas where other land uses could also occur. The impacts of recreational shooting are discussed in Chapter 4.

18(SR911)
Summary Comment: Attempts to close any BLM land to recreational shooting should be done at the congressional level and no lower.
Summary Response: BLM can restrict uses under the planning process and, per FLPMA, BLM is authorized to issue closure orders to protect persons, property and public lands and resources.

Category 19: Lands and Realty

19(660)
Comment: An effort needs to be made to acquire state land within the monument boundary before it is sold to developers.
Response: BLM intends to acquire lands within the monument boundaries from willing sellers, including the State of Arizona, as the opportunities arise over time and as funding is available. If land and/or funding are not available, BLM will continue to work cooperatively with inholding landowners on management activities that are consistent with the goals of the IFNM.

19(661)
Comment: Goal 2 should be the removal of all utility corridors and rights of way as those permits come up for renewal. These activities are incompatible with the purposes of the Monument (not to mention the viewshed), and BLM risks legal action should it fail to address this issue appropriately. Congress should be approached to assist utilities financially with the relocation of their facilities. Why was this not even considered? BLM in the EIS process is required to examine a full range of options and it has clearly failed to do so here.
Response: Goal 2 refers to managing utility corridors, if such corridors are designated in the RMP. BLM considered an alternative to remove utility corridors, while allowing existing utilities to remain within the IFNM (Alternative B). It would be outside the scope of the RMP to make decisions about relocating the existing facilities or soliciting funding from Congress for such efforts. At the other end of the range of alternatives, BLM considered maintaining all of the existing corridors (Alternative A) or maintaining the existing corridors with one additional segment, although all corridors would have a reduced width (Alternative D). Rights-of-way for utilities are not inherently incompatible with the purposes of the monument. To mitigate the impacts that could potentially come from this use, the RMP proposes a range of management actions and restrictions with regard to rights-of-way and corridors. BLM does retain discretion to renew right-of-way authorizations, and removal of rights-of-way could be considered if the right-of-way holder has not complied with the terms of the right-of-way agreement.

19(662)
Comment: What is the funding mechanism for BLM to acquire non-Federal inholdings mentioned? What guarantee is there this will happen? What is the long-term strategy to solve the inholding problem in IFNM. How will it be funded?
Response: The BLM's ability to acquire land is based on available funding, staff, and having a willing seller. Thus, there is no guarantee that non-Federal lands within the IFNM will be acquired. The BLM prioritizes land acquisitions on a statewide basis, and lands are further prioritized within the IFNM, largely based on the need to protect monument objects and other criteria that reflect the protective purposes of the monument. Refer also to comment and response 19(660) for additional information on lands and realty actions.

19(663)
Comment: 4-131 Past, Present, Future
Neglects to mention plans for a billion dollar 2000 MW gas-fired power plant (the Toltec Power Station) and associated high voltage transmission lines (connecting Palo Verde Nuclear Generating Station, Toltec, and Sta. Ana, Sonora, Mexico.) These facilities would have been built immediately east of and almost adjacent to the Sawtooth Mountains (and just north of the West Silverbells) and would have affected ground water, land subsidence, air quality, viewshed, and so on. The city of Eloy planned to annex the region and turn it into an industrial area.
Response: The Arizona Corporation Commission denied the application for the Toltec Power Station in January 2002. No information is available at this time to indicate that this project is being reconsidered by the project proponent. At this time, it is unclear if the City of Eloy will annex this area.

19(664)
Comment: The Arizona Corporation Commission ("ACC") Staff ("Staff') has reviewed the Ironwood Forest National Monument ("IFNM") Resource Management Plan and Draft Environmental Impact Statement that was provided to us on disc by the Bureau of Land Management Tucson Field Offices. Staff has serious concerns for electric reliability in southern Arizona whenever the viability of any electric transmission corridors in that portion of the state are compromised. Staff requests that you fully weigh the significant impact to Arizona's electric infrastructure with any decisions you make with regard to existing electric corridors presently passing through the IFNM.
Response: BLM has considered re-designating the existing corridors (Alternative A) and adding another utility corridor segment within the Sawtooth Mountains (Alternative D). For utility corridors, BLM's proposed alternative is Alternative B, which would result in no designated corridors; land use authorizations for rights-of-way would be considered only when required by law. Presidential Proclamation 7320 provides guidance for managing the monument for "the purposes of protecting the objects identified." Additionally, protection of the monument objects is defined as maintaining the objects over time, such that any human-caused change or impact on the known biological, geological, and archaeological monument object(s) would be undetectable or measurable only in small and localized areas and the integrity of the object(s) would be conserved for future generations. Excluding utility corridors from the monument would best protect monument objects. As further documented in Appendix K, the decision that the proposed plan include Alternative B for utility corridors was based on the need to balance the National Energy Policy Act of 2005 (PL 109-58) and Secretarial order 3308: Management of the National Landscape Conservation System, while complying with NEPA (PL 91-190 as amended) to analyze a full range of alternatives and to appropriately consider and respond to input from the public sector.

19(666)
Comment: Page 2-67
Goal 1. "Secure non-Federal land and interests in land to further the natural ...." Objective 1. "Acquire lands and conservation easements from willing sellers."
We have commented on previous drafts with a request to insert the word, "un-coerced" prior to "willing sellers." Our private property is not for sale.
Response: The term "willing seller" implies that the property owner was not coerced. BLM does not intend to coerce property owners into selling their land. The BLM anticipates that acquisition of land within the IFNM would depend on a number of factors, including resource values, the threat of potential development, availability of funding, landowner interest, and the agency with jurisdiction.

19(667)
Comment: Alternative A (Map 2-15) provides for two (2) one-mile-wide corridors for the aforementioned EHV transmission lines. However, the northern portion of the IFNM west of Range 7 East does not contain a corridor for the existing TEP 345 kV transmission line. BLM staff has characterized this as a "mapping mistake" and stated that a one-mile wide corridor should have been represented for the entire length of the line within IFNM.
Response: Under the Phoenix RMP (BLM 1989), utility corridors were designated only within specific areas called "resource conservation areas," or "RCAs," where BLM would more intensively manage uses compared with areas outside the RCAs. Portions of the IFNM overlap with the previously designated Silver Bell RCA, which included only those corridors shown on Map 2-15. Though there is an existing high-voltage transmission line through this area, no corridor was officially designated under the 1989 RMP for the area.

19(670)
Comment: Draft Goals, Objectives, and Alternatives - Lands and Realty
"Goal 1: Secure non-Federal land and interests in land to further the natural and cultural resource and public and administrative access goals for the monument."
The goal, as it is written, appears to advocate active acquisition, something that the proclamation does not address. SBM suggests the inclusion of the phrase, "as such lands become available for purchase from willing sellers."
Response: The goal of securing non-Federal lands and interests in lands to further the natural and cultural resource and public and administrative access goals is clarified by Objective 1, which reads "Acquire lands and conservation easements from willing sellers," and the management actions, which include "Acquire non-Federal land or interests in land within the IFNM from willing sellers by purchase, exchange, or donation, as opportunities arise."

19(673)
Comment: Recommendation: BLM should avoid important BLM lands, including Ironwood Forest National Monument, in its discussions with DOE reference the West-wide Energy Corridor PEIS. Further, BLM should adopt the management prescriptions outlined in Alternative B (reference Energy Corridors and Rights-of-Way) as the Proposed Plan.
Attachments: Appendix H
1. Department of Energy response to Representative Raul Grijalva addressing concerns of the Congressional NLCS Caucus, 1/31/20
Response: With respect to utility corridors, BLM's proposed plan is Alternative B, the designation of no utility corridors, as the analysis has determine this would best protection the objects of the monument (see Appendix K for more details). The West-wide Energy Corridor Final Programmatic EIS does not propose any corridors within or near the IFNM.

19(675)
Comment: Draft Goals, Objectives, and Alternatives - Lands and Realty
Decisions for Management Actions, Allowable Uses and Use Allocations
Number 1 ignores valid existing rights and SBM requests that this caveat be added to all alternatives.
Response: The language of the Proclamation establishing the IFNM states that "all Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument." The Proclamation also states: "The establishment of this monument is subject to valid existing rights." The language of the Proclamation applies to all alternatives, and is discussed in Section 2.3.1. Under this guidance, BLM would allow valid existing claims to be exercised; however, land would remain under BLM's jurisdiction unless land were patented through an exchange process that could further the protective purposes of the monument.

19(677)
Comment: It is important for SWTC to have a provision that the current right-of-way permit be renewed when the appropriate time arises. Due to the rapid growth in Pima County and Southern Arizona, a clause should added to each alternative that would pose no restriction on the possibility of future upgrade of the current transmission line to a higher voltage. Should SWTC require future upgrades, the SWTC existing 50 foot right-of-way, will require an additional approximate 20 feet for a total of a 70 foot right-of-way. At this time, SWTC does not have a timeframe when such upgrades would be necessary.
Response: BLM would review the future upgrade of an existing transmission line to a higher voltage on a case-by-case basis, as site-specific analyses may be required to assess the impacts of such an upgrade on

the resources and objects of the IFNM. Refer also to summary comment and response 19(674) for additional information on lands and realty actions.

19(SR665)
Summary Comment: BLM should provide for utility corridors commensurate with existing and planned electric transmission facilities within the RMP.
Summary Response: BLM has considered existing and planned electric transmission facilities under the range of alternatives. The planned electric transmission facilities of Tucson Electric Power and Southwest Transmission Cooperative could be accommodated through either existing rights-of-way (which could be renewed in accordance with 43 CFR 2800).

19(SR668)
Summary Comment: Designated utility corridors should be 1 mile wide to accommodate route variations such as elevation, resources, and landforms.
Summary Response: BLM has considered maintaining the 1-mile-wide corridors under Alternative A. The narrower corridors of Alternatives C and D were proposed to provide greater protection to monument resources by confining impacts to a smaller area. These narrower corridors would still allow adequate room to accommodate additional utilities. However, the Proposed Plan for utility corridors is Alternative B, which would not provide for utility corridors. As documented in Appendix K, additional analysis since the Draft RMP/EIS has determined that Alternative B, which still retains existing rights-of-way, best protects the objects of the monument.

19(SR669)
Summary Comment: If present and future electric transmission line corridors are not fully provided for in the Final RMP, then a comprehensive discussion and analysis must be included for the impacts upon southern Arizona and the nation of either 1) loss of electrical supply to major cities and industries in the southwestern United States, or 2) the costs of constructing new lines in new locations to replace the existing 345-kilovolt line and the costs of establishing and siting new paths for future lines to replace those planned over the past four decades.
Summary Response: The plans of the area's major utility stakeholders have been considered in development of the alternatives. Refer also to comment and response 19(664) for additional information on lands and realty actions.

19(SR671)
Summary Comment: Tucson Electric Power expresses concern regarding acquisition of right-of-ways.
Summary Response: The alternatives presented would allow for renewal of existing rights-of-way, as described under the avoidance and exclusion areas decision that states, "valid pre-existing authorizations (i.e., rights-of-way) would be recognized." BLM also has added the following clarifying statement to the alternatives (Table 2-15, under "Avoidance and Exclusion Areas"): "Existing rights-of-way may be renewed in accordance with 43 CFR 2800." BLM has considered existing and planned electric transmission facilities under the range of alternatives. Tucson Electric Power's and Southwest Transmission Cooperative's planned electric transmission facilities could be accommodated through existing rights-of-way (which could be renewed in accordance with 43 CFR 2800).

19(SR674)
Summary Comment: SWTC expresses concerns regarding renewal of rights-of way.
Summary Response: The alternatives presented would allow for renewal of existing rights-of-way, as described under the avoidance and exclusion areas decision that states, "valid pre-existing authorizations (i.e., rights-of-way) would be recognized." BLM also has added the following clarifying statement to the alternatives (Table 2-15, under "Avoidance and Exclusion Areas"): "Existing rights-of-way may be renewed in accordance with 43 CFR 2800."

19(SR676)
Summary Comment: Decisions for lands and realty should note that land would only be acquired through proper legal channels, and not through condemnation.
Summary Response: BLM does not have legal condemnation authority unless specifically given by Congress to achieve particular Congressional acts, and BLM does not intend to use the process of condemnation to acquire lands within the IFNM. Refer also to comment and response 19(660) for additional information on lands and realty actions.

Category 20: Travel Management

20(91)
Comment: 4.8 Irreversible and Irretrievable Commitment of Resources
"Implementation of the any of the management plan alternatives would not result in impacts that could be characterized as irreversible and irretrievable commitments as the RMP would provide objective for resource management and guidance for future activity and implementation-level decisions that minimize the potential for irreversible and irretrievable impacts."
To attempt to manage areas with valid existing claims such that access is impossible or ground disturbing activities are prohibited would result in an irreversible loss of mineral resources and an unconstitutional taking of private property.
Response: BLM considered mining claims when developing travel route designations. Lands with existing active claims will continue to be accessible under 43 CFR 3809 regulations. Ground-disturbing activities associated with existing claims could continue, but activities beyond "casual use" as defined in 43 CFR 3809.5 will require an approved plan of operations before work on the ground can proceed. A validity determination will be conducted as part of the plan of operations review process

20(161)
Comment: On Page 2-79, "Motorized use for administrative access is allowed on a case-by-case basis provided route is not subject to improvements," I do not support the language chosen as this limits the AGFD staff from monitoring of wildlife, habitat and water sources located within the IFNM. It also hinders conservation organizations from assisting the AGFD with maintenance, enhancement and redevelopment of the habitat located within the IFNM. There needs to be an inclusion of wording that allows for monitoring by the AGFD personnel without the need of the Department requesting permission especially on a case-by-case basis. As well permission without excessive limitations, like the stated 'case by case' basis, that will make habitat conservation activities easily achievable as well fundamentally possible.
Response: Habitat conservation activities by the BLM, partners, or other parties will be conducted as needed to achieve management objectives in the RMP. Administrative access will be accommodated for these activities as appropriate. Refer also to comment and response 20(530) for additional information on administrative access granted under an agreement between BLM and AGFD.

20(164)
Comment: I would think the percentages of the IFNM defined in Alternative B and Alternative C that would be reserved for primitive use would create a concentration of motorized traffic in the accessible areas which would lead to a greater amount of ground-disturbing activities, degradation of water quality in localized areas and result in a greater degradation of wilderness characteristics in those areas.
Response: BLM considered the distribution of uses, including increased visitor use and impacts in localized areas, when developing alternatives to designate areas as closed to motorized travel and routes for motorized use. These potential impacts are addressed throughout Chapter 4.

20(166)
Comment: Preservation is excellent, but it must be balanced with the needs of current generations to use the resources that this great country has to offer. I feel that recreational vehicle use is a necessity for this area.
Response: Recreational vehicle use is accommodated in the proposed plan on designated roads and primitive roads. BLM has determined through careful interdisciplinary analysis that Alternative C will provide a balance between visitor use and resource protection.

20(168)
Comment: Recommendations: BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads. Comprehensive travel management planning should occur within the context of the RMP.
Response: BLM engaged in an exhaustive, landscapewide analysis of the travel network within IFNM prior to making route designations. See the "Route Evaluation Process for Travel Management Planning" in Appendix G of the Draft RMP/EIS. Further information on the evaluation of each individual route is available at the BLM Tucson Field Office.

20(171)
Comment: The Sonoran desert tortoise (Gopherus agassizii) is specifically mentioned in the Proclamation. Roads and routes in high quality tortoise habitat should be limited to administrative use (unless otherwise duplicative or unnecessary, in which case they should be closed entirely), with travel stipulations limited in the RMP.
Response: The Sonoran desert tortoise and its habitat were considered in developing the proposed travel management designations and alternatives. Motorized routes are minimized in Category 1 and Category 2 habitat.

20(172)
Comment: What is meant by "vehicle types?"
Response: Under 43 CFR 8340, BLM can regulate the type of vehicles that use travel routes on BLM lands. For engineering purposes, the type of vehicle that a route is intended to accommodate dictates the geometry of the route: width, grades, turning radii, side and overhead clearance, and other physical parameters. The vehicle type indicated for each route in the table in Appendix G under the item named "DSTD," defined on page G-13, establishes the typical vehicle the route will be managed to accommodate. Other vehicle types may use the route, but the design and maintenance standards will be established by the typical vehicle type for the route.

20(174)
Comment: The ability to have facilities located at different points through the IFNM area would allow a greater level of access in that there would be places to use the restroom, procure water and essentials [because] I would think the percentages of the IFNM defined in Alt B and Alt C that would be reserved for primitive use would create a concentration of motorized traffic in the accessible area which would lead to a greater amount of ground-disturbing activities, degradation of water quality in localized area and result in a greater degradation of wilderness characteristics in those area.
Response: The IFNM is a unit within BLM's National Landscape Conservation System (NLCS), and is managed, in part, to maintain the character of the existing setting. Part of the overarching strategy and vision for NLCS units is for BLM to work with local communities with regard to amenities and visitor facilities, which would be located in communities adjacent to BLM lands. As such, BLM has not included construction or installation of any significant visitor use facilities in the Draft RMP/EIS (refer to Table 2 14 under "Visitor Services"; additional information also has been included in Section 2.2, "Alternatives Considered But Not Analyzed in Detail"). The proposed RMZs indicate the character of the IFNM that will be preserved to achieve the targeted recreational benefits/outcomes. Generally, visitors will be

expected to be self-sufficient, and no facilities will be provided. However, minimal facilities could be installed in the future if needed to protect public health and safety and resources, particularly in the Roaded Natural RMZ, where the greatest amount of visitation is expected to occur.

20(175)
Comment: In addition, BLM should actively seek partnerships and scientific endeavors in order to better inform itself regarding ongoing and potential negative impacts to Monument Objects, and utilize newly acquired information, such as archaeological surveys, in route decisions.
Response: As indicated in Appendix D, BLM will pursue partnerships and scientific relationships with Federal, State, local, and educational agencies and entities to conduct inventory, monitoring, and research to enhance adaptive management of the transportation system within the IFNM. See Section 2.3.5 for additional information on the development of a monitoring plan in the IFNM, which will include a process for gathering public input.

20(176)
Comment: Routes left open will attract increasing traffic of ATVs and dirt bikes, leading to still more impacts in the years ahead. The final plan should assume increases in traffic on any routes left open, and the impacts of that traffic must be considered.
Response: During the route evaluation process, and in its cumulative analysis, BLM considered the impacts of increased use of designated routes within IFNM. As monitoring identifies changing conditions on the IFNM, BLM can and will adjust management accordingly, including changes to route designations as consistent with the Proclamation and NEPA (refer to Section 2.3.5 for more information on adaptive management).

20(177)
Comment: Since the Sawtooth Mtns. have been degraded by 4x4, will it be reasonable to keep protecting it?
Response: The Presidential Proclamation mandates the protection of resources within the monument, including the Sawtooth Mountains. Modifying the boundaries of the IFNM, or excluding an area from BLM's protection, is beyond the scope of the RMP. Degraded areas in the monument will be targeted for restoration as needed.

20(180)
Comment: The roads should be planned and controlled to allow Border Patrol to do their job.
Response: When routes were evaluated for designation, the criteria that were applied included the need for access to meet management objectives and other administrative requirements (including U.S. Border Patrol use and access needs for fire management activities and vehicle types). Existing travel routes across the monument are currently used in U.S. Border Patrol operations in conjunction with aircraft operations. Traffic associated with illegal border activity moves across the monument, and impacts on natural resources occur along roads, transfer points, range improvements, and foot trails. The transportation system will continue to support border zone operations by law enforcement agencies.

20(526)
Comment: I would like to see more routes designated as Non-Motorized. I am most concerned about the area north and east of the Silverbell Mountains between Ragged Top and Red Hill as well as the area around the Samaniego Hills.
Response: Upon further review of wildlife and vegetation management objectives for these areas, some routes and portions of routes have been adjusted in the Proposed RMP to allow non-motorized access only, which increases the miles of routes designated as non-motorized. While motorized access is limited in these areas, some motorized access is preserved to provide access to high-quality recreational opportunities.

20(527)
Comment: I would also like to see Route 620B near Ragged Top designated as Non-Motorized.
Response: Motorized access within the Ragged Top area is limited by natural features and will be further restricted by specific management actions, including route designations, in the RMP. Route 620B preserves one of the few opportunities to approach Ragged Top by vehicle. The southern end of this route, which further climbs the bajada slopes of Ragged Top, will be designated as non-motorized in the proposed RMP (at the route's junction with 621B1).

20(528)
Comment: G-2 Route Evaluation Criteria
These criteria are arbitrary and reflect no serious basis in fact. There is no discussion or analysis of the criteria and how their choice might impact the Monument and its resources.
Response: The criteria were specifically identified based on the monument resource values, issues, concerns, access needs, and management objectives defined during information gathering and public scoping for the RMP. The criteria were applied to identify route designation alternatives and select the appropriate travel management designation given the location of the route, resource values present, and its access purpose. The database for the route inventory and evaluation, available for public review at the BLM Tucson Field Office, contains the specific factors addressed for each route.

20(532)
Comment: Recreational Management Zones
Maps 2-12, 2-13 and 2-14 show areas that have both motorized and non motorized zones and motorized and no motorized routes. On attachments 1, 2 and 3 you will find places where motorized travel is allowed in a no motorized zone. [Maps unreadable]
Response: The motorized routes shown with non-motorized zone adjacent to the route are excluded from the prescription applicable to the zone; either by setback on one side or both, the road's right-of-way is excluded from the non-motorized zone. The maps were revised to improve readability in the Proposed RMP/Final EIS.

20(534)
Comment: Unidentified and/or undesignated roads: 620 PA, 620 OA, 622L, 627E, 627B, 627M, 629 M, 632A1 A, 632A1 B, 632B, 629 L -- no access designation indicated in the DRMP.
Response: These routes traverse lands that are the sole jurisdiction of ASLD. While all routes within the boundaries of the IFNM were inventoried, and most were evaluated, BLM will not designate those routes that lie entirely on non-Federal lands unless they are essential for providing access to monument lands and need to be managed consistently. Route designations on non-Federal land would only be implemented if BLM acquires non-Federal lands, or acquires easements or rights of way, in which case the route will be managed according to designations and access needs on adjacent federal lands.

20(535)
Comment: Road 625 A-- Road designation on map for Alternative C is inconsistent with overnight camping allowed in Alternative C
Response: Route 625A is designated for motorized use with a day-use only restriction. Under the proposed alternative, motorized camping would not be allowed on this route because there are no motorized camping sites identified there, due to the day-use restriction. BLM could not identify any inconsistencies within the alternative with respect to camping and the designation of route 625A.

20(536)
Comment: Missing roads: 1. A short road central to Section 21 branches east from the railroad grade (625) and terminates at a mine. This is missing from the DRMP maps.

Response: This route accesses active mining claims and a mine adit, posing a public hazard. The route has been added to the transportation inventory and designated to allow non-motorized access only. It is presently closed to motorized travel and will remain closed. Access to existing active mining claims is considered administrative use and will be accommodated by the route designations allowing vehicle use, and for non-motorized routes under an exception for access to claims pursuant to 43 CFR 3809. Access needs beyond casual use will require a plan of operations under all alternatives, including road improvement or reconstruction if needed. This has been clarified in the RMP in Appendix D, "Administrative Actions," under the travel management section.

20(538)
Comment: The Following Roads should be further restricted (beyond Alternative C)as follow:
Township 11 Range 8: Non-Identified Roads
1. The short road central to Section 22, which connects 625 A to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified.
2. The short road central to Section 22, which connects 620F3 to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified.
2Z--The BLM ought to consider closing this road to all motorized access except the electric company. It is unnecessary for ranching purposes. It ends at a wash, which only encourages OHV recreationists to drive up and down a sensitive xeroriparian wash that is a major corridor for bighorn sheep. When the OHV recreationists travel north in this wash they eventually encounter the fence that runs along road 2J3. This fence is frequently found cut open or mangled at this location. However, the electric company absolutely MUST have unfettered access as needed.
Response: The route described is Route 625C. It is designated for non-motorized use in the proposed alternative. The route described is Route 620F4, and it is designated as non-motorized in the proposed alternative.
Route 2Z has been designated as non-motorized in the Proposed RMP/EIS to reduce conflicts with bighorn sheep as they move through a corridor linking the Silver Bell Mountains with the West Silver Bell Mountains. The route does not service any power line.

20(539)
Comment: ASARCO – Draft Goals, Objectives, and Alternatives – Transportation and Public Access Decisions for Management Actions, Allowable Uses and Use Allocations
Number 1 shows areas closed to motor vehicle use for alternatives B and C in areas designated for management of wilderness characteristics. Valid existing claims in these areas need to be recognized and provisions made for them. This is referred to in the Summary on page S-13 but not addressed in the alternatives.
Response: Access to existing active mining claims is considered administrative use and will be accommodated by the route designations allowing vehicle use, and for non-motorized routes under an exception for access to claims pursuant to 43 CFR 3809. Access needs beyond casual use will require a plan of operations under all alternatives, including road improvement or reconstruction if needed. This has been clarified in the RMP in Appendix D, "Administrative Actions," under the travel management section.

20(540)
Comment: Recommendation: As non-federal lands are acquired, BLM should analyze relevant portions of the motorized and non-motorized transportation network to determine if access to the acquired parcels is still required by existing rights. If it is not, then the BLM must limit those routes to help protect Monument Objects.
Response: As non-Federal lands are acquired, the route designations in the RMP will be reviewed and updated as necessary. Each route will be evaluated based on the criteria used to evaluate all routes in the IFNM, as presented in Appendix G, in addition to any new pertinent information.

20(547)
Comment: AGFD: Catchment 730 is located in the Samaniego Hills. The Route number accessing this catchment is 2A and 2A2 (see Appendix G). Every alternative for Route number 2A and 2A2 shows the Designation Code C08.
AGFD: We request Route Numbers 2A and 2A2 be given Designation Code ML06 UserAdminMtrPermiteeMtr.
Response: Routes 2A and 2A2 cross private land adjacent to the exterior of the monument and do not provide access to wildlife waters. Access to Catchment 730 would be provided by Routes 2E or 2F:

20(548)
Comment: the Department suggests clarifying within the document to provide the level of detail necessary to understand route designation decisions within the planning area.
Response: Route evaluation criteria and factors considered in the designations are described in detail in Appendix G, and the designations are indicated in the table listing the route designations. Further information on each route is contained in the IFNM route evaluation database available at the BLM Tucson Field Office.

20(550)
Comment: NTHP: The Route Evaluation Tree, which BLM adapted to develop the route designations, is flawed and fundamentally inconsistent with the intent of the proclamation. The president made clear in the proclamation his intention to limit motorized travel to designated roads in Ironwood Forest. Accordingly, BLM must make a threshold determination that each route evaluated during the route evaluation process meets the definition of a road. See 43 U.S.C. § 1732(a) (stating that public land dedicated to specific uses by "other provisions of law ... shall be managed in accordance with such law"). The description of the Route Evaluation Tree provided to the public within the Draft RMP does not show that BLM made this determination for each route. See Draft RMP at App. G-1-24. What the Draft RMP reveals is that BLM considered a number of criteria broadly categorized as "resource concerns," "access concerns," and "political concerns" during the route evaluation process, but did not consider what the proclamation intended to be the dominant concern: whether a route qualifies as a "road." Because BLM failed to incorporate this consideration into the route evaluation process, it cannot show that the proposed route designations comply with the proclamation.
BLM should reevaluate the criteria they used in designating the travel system in the Draft RMP and develop a travel system which meets the requirements provided in the Monument Proclamation.
Response: The route evaluation process did consider the requirements in the Proclamation. The Proclamation directs BLM to prepare a transportation plan and to prohibit motorized and mechanized use off road as part of that plan. A critical step in the development of the transportation plan was to evaluate each route within the context of the overall purpose of the IFNM. As part of the evaluation process, BLM assigned an asset type (road, primitive road, or trail) to each route, based on access needs, functional requirements, management objectives and resource values involved. Motorized and mechanized travel are only allowed on roads and primitive roads designated for such use, in accordance with the Proclamation. (See Table G-1.) Appendix C has been modified to clarify the designations of each route.

20(552)
Comment: NTHP: 2. Proposed road designations will not provide protection for archaeological objects in Ironwood Forest.
The Draft RMP contains no evidence that BLM surveyed the proposed travel network for prehistoric and historic objects. Without an informed understanding of the location and condition of prehistoric and historic objects in Ironwood Forest, BLM simply cannot show that the road designations proposed in the Draft RMP will protect the National Monument's archaeological objects as required by the proclamation.
NTHP Recommendation: Reevaluate proposed road designations after conducting a comprehensive survey of the proposed travel networks for prehistoric and historic objects. Disclose and analyze this

information in the Final RMP and provide a new or amended alternative reflecting this new information and provides for the protection of archaeological objects in Ironwood Forest.
Response: Information on cultural resources was considered in developing route designations. Information included previous cultural surveys conducted on IFNM, and a special study conducted in 2005 specifically to gather information for preparing the RMP. Additionally, cultural surveys were conducted in 2007 and 2008 for motorized routes in the monument, as well as some non-motorized routes. Surveys will eventually be completed for all the travel routes in the monument (roads, primitive roads, and trails) and are a priority for available funds. New information from the 2007 and 2008 surveys was considered in the route designations in the Draft RMP, and that resulted in several adjustments to those designations based on the need to protect cultural resources. These adjustments are reflected in the Proposed RMP/EIS. New information revealed by future surveys will be considered to ensure cultural resource values are protected. This review included identification of historic roads and trails. Many of the routes in use today are historical routes dating to the early 1900s, although some have been realigned over time, or their use has shifted due to changing land use needs. No site-specific cultural resource information will generally be included in documents available to the general public. Site information is sensitive data and is not available for public review. Consideration of cultural resource values in the route designation process was consistent with Bureau guidance, including BLM WO IM 2007-030.

20(555)
Comment: It is critical to SWTC that motorized access be limited to administrative purposes only within the utility corridor. Any recreational use along the corridor should be limited to non-motorized activities such as hiking, mountain biking, walking or equestrian traffic.
Response: Route 601BC is the service road for the existing power line within this corridor (Corridor 2). It was designated in the draft plan for non-motorized use, with exceptions for administrative purposes. A route designated for motorized use (Route 602) parallels the power line on the west within the corridor north of Cocoraque Ranch Road. This route does not interfere with the facility and will remain designated for motorized use.

20(557)
Comment: Finally, the Proposed Plan uses the term “non-motorized” to include “mechanized vehicles.” Since neither motorized nor mechanized vehicles are permitted off road in the Monument, this term should not be used to describe corridors in the Monument that may be used by mechanized vehicles without clarifying that they must also meet the definition of a “road.”
Response: The BLM initially interpreted the term “off road,” as used in the Proclamation, as referring to a prohibition of “cross-country” vehicular travel, including mechanized vehicles such as mountain bikes, and developed various travel management decisions based on this interpretation. A more literal reading of the term “off road” produces a conclusion that would prohibit motorized and mechanized vehicle use off a designated road system (including primitive roads). Because the BLM’s trail definition found in IM 2006-173 (Implementation of Roads and Trails Terminology Report) could include both motorized and mechanized vehicle use, such vehicular trails, in light of a literal interpretation of “off road,” would not be allowed in the IFNM. Thus, we concur with this aspect of your comment. To clarify the BLM’s intended management regarding this issue, the Proposed RMP/EIS contains revised language and prescriptions in Table 2-16 and Appendix G.

20(559)
Comment: Specific examples of problematic management designations in the Draft RMP include:
- No BLM surface lands would be closed to vehicular traffic, and motor vehicle use would be limited to designated roads and trails on 128,400 acres pp. 4-8. As noted above, trails are not roads and neither motorized nor should mechanized vehicles be permitted on trails in the Monument.
Response: This line has been revised to delete the reference to “motorized trails,” which do not occur within the IFNM.

20(560)
Comment: Specific examples of problematic management designations in the Draft RMP include:
- 4.3.1.4 Alternative C Approximately 10,880 acres of the BLM surface lands would be closed to vehicular traffic: motor vehicle use would be allowed on "designated routes" on the remaining 117,520 acres. Draft RMP, pp.4-6. Since routes may mean transportation corridors other than roads; this term should not be used in describing the transportation system in the Monuments.
Response: This line has been revised to clarify that motorized use is allowed only on routes that have been designated for motorized use.

20(561)
Comment: A number of routes already identified on the travel network for the Monument clearly violate the Proclamation, because they do not meet the definition of a "road." Specific routes, based on the route identifiers used in the Draft RMP include, but are not limited to (this list is not comprehensive; other designated routes most likely also violate the Proclamation):
BLM Route 601A1, BLM Route 601E, BLM Route 604A3, BLM Route 625E, BLM Route 620H1, BLM Route 638C.
Response: Routes do not need to meet the definition of a road to be considered through the RMP process for designation of transportation assets (roads, primitive roads, and trails). Those determinations are made in the transportation planning process developed pursuant to applicable legal authorities for BLM lands as provided for in the Proclamation.

20(562)
Comment: in order to meet the requirement of protecting Monument Objects, BLM must calculate habitat fragmentation and make decisions regarding travel management based on reducing fragmentation of wildlife habitat.
Response: Wildlife habitat was considered under several criteria used during the route evaluation (see criteria listed in Appendix G under "Route Evaluation Criteria"). Because little information exists on the specific effects of roads on wildlife and wildlife habitat in the Sonoran Desert, the BLM Tucson Field Office has partnered with AGFD to conduct a study to determine the effects of road density and intensity of road traffic on Sonoran Desert wildlife in various ecological settings. Field study sites will be located in the IFNM and the White Canyon Resource Conservation Area. The information from this study which was started in 2009 will be used by BLM to enhance management of the Sonoran Desert through better travel management planning, rangeland health evaluations, wildlife habitat management plans, and other relevant planning efforts.

20(563)
Comment: Table 2-16 (Draft RMP, pp. 2-76 - 2-77) describes that as non-federal lands are acquired, lands would be designated for OHV use consistent with the maps presented in the RMP. However, the RMP does not describe the process it will use for designating travel routes on these non-federal lands.
Response: The routes throughout the monument were evaluated and alternatives for their designation were identified based on available information. The designations shown on the travel management maps in the draft plan on non-Federal lands have been removed from the Proposed RMP due to concerns raised by the landowner. Upon acquisition of non-Federal lands, routes would be reevaluated using the same evaluation process described in the RMP.

20(564)
Comment: Designate areas for off-road vehicles and for jeep trails.
Response: The route designations allowing motorized travel will be available for motorized vehicle use subject to the use restrictions established in the RMP and travel management plan. Motorized trails and areas designated for off-road travel are precluded from consideration by the Proclamation.

20(565)
Comment: I would like to see the following routes designated Non-Motorized: 627, 627C, 627F, 626A, 626, 621-1, 621, 621E, 621F1, and 621F2.
Response: These routes are needed for vehicle access for administrative purposes and public use to achieve various management objectives. Further information on each route is contained in the IFNM route evaluation database available at the BLM Tucson Field Office.

20(566)
Comment: None of the terms are defined (what is a management objective or an administrative requirement?
Response: The term "objective" is defined in the glossary as the planned results to be achieved within a stated period. Objectives are subordinate to goals, more narrow in scope, and shorter in range. Objectives must specify times for completion, and products or achievements that are measurable. Administrative requirement, as used in this context, means the day-to-day activities required to serve the public and provide optimum management of the resources within the planning area. These actions are allowable and do not require authorization within an RMP, but may require site-specific analysis under NEPA.

20(572)
Comment: Township 11 Range 9 Township 11 Range 9 S19: 620 AX and 621B1 -- This road should be closed to ALL access and restored to its natural state. It was created illegally within the last two years by off-road OHV travel. This has resulted in significant erosion, litter, major vandalism to a ranch boundary fence, cutting of standing saguaros and other standing wood, and more wildcat tire tracks and roads stemming from it. The BLM Alternative C indicates this road is to remain open fully open to all motorized access.
The DRMP for Alternative C has the road ending abruptly when it runs perpendicular to the Morningstar/Claflin allotment boundary fence. As a result of this illegal road, the ranch boundary fence has already been cut and replaced by a 100' gaping hole, and the wooden fence posts apparently burned in someone's campfire. This is intolerable.
A small campsite could be left open right at Silverbell Road, but the portions of the road beyond the "NOT A ROAD" sign which we ranchers installed on February 3, 2007, (having notified BLM in writing of our plan to do so and having received no objection from BLM) should remain closed to motorized access. we do not even support keeping it open as a hiking trail, because it only invites the public to cut open or otherwise mangle or alter a ranch boundary fence for easy access to the opposite side. There are plenty of alternate hiking trails in the near vicinity. Slicing and dicing Ragged Top with new roads is unacceptable. This road was created by illegal means after the establishment of the National Monument in 2000, it does not appear on the 1989 USGS Silverbell quadrangle map. we would formally protest any BLM authorization of its continued use. The BLM is violating the legal requirements of the Proclamation by proposing wildcat roads be authorized for regular motorized recreational use, especially in an area as biologically rich and as sensitive as Ragged Top.
Response: Route 620AX and part of 621B1 were initially identified in 1980 during the wilderness inventory for the area as a vehicle access "way." It has remained in similar condition since that time, with some natural revegetation occurring, and an increase in use in recent years. It crosses State lands and is currently closed by the grazing lessee and AGFD at its junction with Silverbell Road, on State land. The remainder of the route on BLM land was designated in the Draft RMP to provide vehicle access to high-quality recreational opportunities. This route will be designated for non-motorized use in the Proposed RMP to protect natural resources, with administrative access to meet grazing program objectives. Access to the fence line away from the designated trail will remain by non-motorized means. Route 621B1 is designated for non-motorized use in the Proposed RMP to provide a connection between Routes 620AX and 620B. Route 620B is designated for motorized use in the proposed alternative.

20(606)
Comment: Motorized routes with [which] lead to prehistoric sites should be rehabilitated to non-motorized routes.
Response: Available cultural resource information was considered in developing the designations for the transportation plan. New archaeological surveys have been conducted and additional surveys are planned for the transportation system consistent with current BLM policy (IM AZ-2007-030, Clarification of Cultural Resource Considerations for Off-Highway Vehicle [OHV] Designation and Travel Management). Mitigation measures were considered in the routes evaluation process as necessary to protect cultural resources, which include restricting use and/or reclamation of travel routes. Motorized access is generally preserved to cultural sites identified for public use in the Proposed RMP.

20(608)
Comment: Roads are not necessary in a place with hiking trails. The existing routes are sufficient.
Response: Hiking trails and motorized routes provide different types of access. In addition, motorized routes provide access to hiking trails, which BLM considered when developing the route designation alternatives.

20(609)
Comment: Safety requires that recreational users be able to park completely off the designated roads for hiking, and viewing flora and fauna. Ample provisions should be made for small pullouts and parking areas throughout the Monument.
Response: BLM policy applicable to IFNM states that "motorized use shall keep within the designated route with reasonable use of the shoulder and immediate roadside, allowing for vehicle passage, emergency stopping, or parking unless otherwise posted." (IM AZ-2005-07). This allows for pullouts and parking; specific pullout and parking turnouts for recreational activities will be identified and made available by BLM during implementation of the RMP.

20(610)
Comment: Prohibition of road motor vehicle travel is acceptable if exceptions are made for hunters to retrieve large animals and special permission is available for resource management, removal of dangerous wildfire fuel, or other appropriate activity sanctioned by the managing agency.
Response: The Proclamation prohibits cross-country travel by all motorized and mechanized vehicles except for emergency or authorized administrative purposes. Restrictions on public use of motor vehicles will apply to all recreational activities, and hunters will not be allowed to drive a motor vehicle cross country to retrieve game in the monument. The BLM, permittees, and other agencies will generally comply with all travel restrictions, but use of motor vehicles on routes designated for non-motorized travel may be authorized for administrative purposes related to maintenance and operation of the IFNM.

20(611)
Comment: Also, by leaving the roads open to public travel there is more chance of the general public being able to take care of the issues that your agency does not have the money or manpower to do. Such as being your eyes and ears throughout the monument. The general public can travel more areas than your agency because there are more of us and we are the main users of the public lands.
Response: When routes were evaluated for designation, the criteria that were applied included the need for access to meet management objectives and other administrative requirements, including law enforcement, monitoring, maintenance and related activities. . Citizen patrols can assist with some of these activities, and opportunities for engaging users in monitoring, detecting, and reporting condition that need management attention be pursued during implementation of the RMP including activities along roads.

20(618)
Comment: Limit motorized routes further, on areas of wilderness character
Response: Both Alternatives B and C include recreation management zones and transportation networks where areas with wilderness characteristics would be protected in a primitive setting without motorized vehicle routes. Refer to Maps 2 10, 2 11, 2 20, and 2 21.

20(624)
Comment: Necessary and vital access to major ranch infrastructure is completely cut off in Alternative C as written.
A shipping corral along with the entire water supply and distribution systems serving the eastern half of the Tejon allotment are all cut off from all motorized access. We need motorized access to this infrastructure.
Response: Motorized administrative access in this area may be granted to meet grazing program objectives. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees.

20(626)
Comment: Recommendation: BLM should use the information provided in Appendix B to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Ironwood Forest National Monument when conducting travel management planning.
Response: Wildlife habitat was considered under several criteria used during the route evaluation (see criteria listed in Appendix G under "Route Evaluation Criteria"). Because little information exists on the specific effects of roads on wildlife and wildlife habitat in the Sonoran Desert, the BLM Tucson Field Office has partnered with AGFD to conduct a study to determine the effects of road density and intensity of road traffic on Sonoran Desert wildlife in various ecological settings. Field study sites will be located in the IFNM and the White Canyon Resource Conservation Area. The information from this study will be used by BLM to enhance management of the Sonoran Desert through better travel management planning, rangeland health evaluations, wildlife habitat management plans, and other relevant planning efforts.

20(628)
Comment: Recommendation:
BLM must provide a travel management plan that specifically monitors the conditions, impacts, trends, and emerging threats to Monument Objects in order to achieve its purpose (1.3.1) of protecting Monument Objects.
Response: The basic framework of the IFNM travel management plan (TMP) is contained within the Proposed RMP/EIS in Table 2-16 and Appendix G, and other information, including a TMP monitoring plan will be released with the approved RMP. Monitoring is an administrative action that will be an ongoing part of the management of the IFNM, particularly with regard to the transportation system and its use. As monitoring identifies changing conditions, BLM will adjust management accordingly (refer to Section 2.3.5 for more information on monitoring and adaptive management).

20(630)
Comment: In evaluating the impacts of the travel network on the Monument objects, the DRMP cannot simply dismiss the likely impacts of increased visitation and rapid population growth.
Response: The potential impacts of increased visitation and population growth are included in the analysis as part of the assumptions in Sections 4.3 and 4.4, and the analysis of increased visitation and population growth is addressed under cumulative impacts in Section 4.7. Increased visitation and population growth were also considered in developing the proposed travel management designations.

20(631)
Comment: Recommendations: When valid existing rights, such as grazing permits, change, BLM should also analyze relevant transportation decisions and act to protect Monument Objects,
Response: As conditions change, BLM can and will adjust management accordingly, including changes to route designations as consistent with the Proclamation and NEPA (refer to Section 2.3.5 for more information on adaptive management). If changes to management require additional analyses of impacts on monument objects, such analyses would be conducted at that time.

20(633)
Comment: NEPA's "hard look" statute requires nothing less than for the BLM to evaluate each of the multiple use authorizations in this plan in context of the border situation, i.e., legal roads must be considered cumulative and additive to the impacts of illegal ones.
Response: Existing authorizations were reviewed for their access needs, potential impacts, and potential conflicts with other uses, and were considered in travel management planning. The cumulative impacts described in Section 4.7.2.14, "Travel Management," have been revised to include impacts associated with illegal immigration.

20(634)
Comment: EPA Recommendation:
The locations of inventoried routes need to be clearly illustrated on maps and referenced appropriately in the FEIS. The 18 route inventory maps that contain this information should be included in the FEIS and should be referenced in the table of contents and within the text of the FEIS (table 2-16; maps 2-19, 20, 21, and 22; sections 3.1.1 and 4.3.1; and Appendix G).
Response: The Proposed RMP contains new travel management and inventory maps at larger scales that are more easily read.

20(638)
Comment: I have witnessed recreational ATV and Dirt Bike enthusiasts causing a great deal of damage to the desert areas and causing extremely large dust plumes to develop in their areas of use. This is a problem that needs to be addressed without limiting the use of the existing roadways by hunters and other individuals with legitimate reasons for being in these areas.
Response: It is the intent of the BLM to provide protection of resources while balancing visitor use and administrative needs within the monument. Soils in the IFNM were considered in developing proposed route designations. Travel routes on soils that are highly prone to fugitive dust under traffic were minimized, and mitigation measures will be taken for those routes that cannot avoid crossing dust-prone soils. Restrictions on the use of travel routes will generally apply to all public use, including hunting.

20(639)
Comment: I hope that the BLM will adopt a management plan that really does something about illegal off-roading in IFNM. This activity should not be permitted here because of its destructive effects on what is a very fragile environment. I urge the BLM to invest in frequent patrols to insure that vehicles stay only on designated trails and that all wildcat trails are closed.
Response: The BLM will conduct law enforcement and user education efforts to promote compliance with use restrictions resulting from the RMP, including use of motor vehicles. The Proclamation directs that all off-road motorized and mechanized vehicle use be prohibited, except for emergency or authorized administrative purposes. In addition, the Proclamation requires a transportation plan be prepared to identify road closures and travel restrictions to protect monument objects. Consistent with the Proclamation, no areas are proposed as open for OHV travel off road; motorized travel must remain on designated routes. Alternative C designates approximately 124 miles of existing routes for continued motorized travel. These routes have been identified by an interdisciplinary team to provide continued access for a variety of uses, including recreation, while meeting resource protection and administrative

needs. While the Proclamation does not specifically direct BLM to accommodate OHV use, it does provide for management of monument lands under current regulations, which allow public access and use by motorized vehicles, including OHVs, if this use is not incompatible with the purposes of the IFNM. BLM has determined that OHV use, when restricted to a limited number of designated roads, is not incompatible with the purposes of the IFNM.

20(641)
Comment: Recommendation:
EPA recommends that BLM limit the expansion of OHV use in PM10 non-attainment areas. Under Alternative B, the PM10 non-attainment area overlaps 23,650 acres where motorized vehicle use would be allowed on designated routes (pg. 4-5). Under the Preferred Alternative C, the PM10 non-attainment area overlaps 29;930 acres where motorized vehicle use would be allowed on designated routes (pg. 4-6). EPA recommends that BLM consider additional restrictions on OHV use within the PM10 nonattainment area.
Response: The PM10 nonattainment area was considered in the route evaluation process and motorized vehicle route designations were minimized in this area. Only those routes which provide needed access would be designated to allow vehicle traffic, and mitigation measures will be applied to those routes to minimize PM10 emissions. See Table 2-1 for measures that would be applied to routes within the PM10 nonattainment area.

20(642)
Comment: Recommendation:
EPA recommends that the BLM fully evaluate current OHV usage in regulated and non-regulated areas; estimate PM10 emissions from OHV use; and address permitting and enforcement efforts. BLM can evaluate the consequences of OHV management decisions only if baseline conditions have been established initially, and it is unclear whether this has been done. This information should be included in the Final Environmental Impact Statement (FEIS).
Response: As suggested, BLM has calculated estimated PM10 emissions from OHV use in the planning area, and results have been incorporated into Section 4.3.1, “Impacts on Air Quality.”

20(643)
Comment: Recommendation:
EPA recommends that BLM adopt general mitigation measures to reduce OHV impacts on air quality, especially in areas of non-attainment: 1) motorized competitive races should not occur in PM10 non-attainment areas; 2) BLM should prohibit all OHV use in the PM10 non-attainment areas on high pollution days as forecasted by the Arizona Department of Environmental Quality; 3) use gates, fences, and other barriers to minimize emissions/fugitive dust, as well as erosion; and 4) require permits to manage OHV use.
Response: Motorized competitive races where the element of speed is important would not generally be permitted in the IFNM, since this activity is not considered to be dependent on natural resources and would not be consistent with proposed recreation management zoning. Gates, fences, or other barriers will be used to implement route designations. OHV use will be regulated along with other motorized vehicle use, and all vehicles will be subject to the use restrictions and designations. Air quality impacts were considered in developing the proposed travel management designations and will be considered when implementing emergency actions or responding to land use proposals.

20(650)
Comment: The following roads should be further restricted (beyond Alternative C): The short road central to Section 22 Township 11 Range 8, which connects 620F3 to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified.

Response: Route 620F3 is designated as a day use only for motorized vehicles with no overnight camping allowed. Degraded areas in the monument will be targeted for restoration as needed.

20(747)
Comment: We need an agricultural exemption on all equestrian use and non-motorized access restrictions.
Response: Cross-country equestrian and non-motorized, non-mechanized travel are both allowed in the Draft RMP and the Proposed RMP. The only restriction that would apply to equestrian and non-motorized travel is the seasonal closure of desert bighorn sheep lambing areas during lambing season (see Chapter 2, Table 2-5). Where necessary, administrative access for grazing-related purposes will be provided under separate agreement with the grazing permittees. An administrative action has been included in Appendix D under "Livestock Grazing" to clarify this issue.

20(748)
Comment: 4.3.5 Impacts on Wildlife and Wildlife Habitat 4.3.5.3 Alternative B
However, closing lambing areas within the WHA to human entry from January 1 through April 30 would reduce human disturbance during lambing season and potentially improve breeding success."
The impact of closing access to private land needs to be fully addressed or the private land and associated access roads should be removed from the closure area.
Response: Closing access to private land, or any non-Federal lands, is not proposed under any alternative. The closure referenced would only affect BLM land in the desert bighorn sheep lambing habitat during the lambing period.

20(752)
Comment: "Within the roaded RMZ, six areas are identified for access and/or staging locations for equestrian uses." We need to reserve the right for ranchers to enter the Monument by horseback directly from our private lands.
Response: The identified access and staging areas for equestrian use are intended to accommodate public demand for those functions, particularly for those traveling to the IFNM, and do not preclude access by equestrian users from other roads and trails. Access from adjacent private lands will be accommodated where needed for administrative purposes related to grazing permits.

20(754)
Comment: It doesn't appear that access points to the IFNM are discussed. How will they be managed?
Response: Access points were discussed in the Draft RMP on page 2-77 and identified on Maps 2-20 through 2-22. Upon further review, BLM has determined that proposed management of access points should be determined through the travel management planning process and that it does not qualify as a land use plan decision. Access points will be identified in the IFNM travel management plan, along with associated signing plans for each access point, proposed locations for information kiosks, staging areas, and other related information. The access points will be subject to route designations, travel restrictions, and acquisition of legal access, as well as management actions and other use restrictions established in the RMP.

20(755)
Comment: All vehicular use should be discontinued from some roads to protect wildlife (i.e., bighorn sheep) as needed.
Response: Wildlife habitat values were considered in developing the travel route designations and various RMP allocations, and some routes have been designated as non-motorized to protect habitat values. Additionally, seasonal restrictions under Alternatives B, C, and D, would be implemented in specific areas to protect desert bighorn sheep lambing habitat from January 1 through April 30. The closure of these areas could occur through restrictions on vehicle travel on specific routes. Furthermore, the seasonal restriction may be implemented in other areas if monitoring reveals changes in lambing habitat.

20(756)
Comment: Necessary Roads in Township 11 Range 7:
632 A1 is drawn incorrectly. It goes to the northwest corner of section 06.
Response: The location of Route 632A1 was verified by aerial photography and field-gathered data. The corner of the existing fence does not coincide with the section corners.

20(757)
Comment: Roads in Township 11, Range 8
620K2, 620 K2A--The power company must be allowed motorized access to these routes for emergency fence repairs.
Response: Route 620K2 is designated motorized and allows vehicle access. 620K2A provides access to mining claims and mine shafts presently closed to vehicles to protect public safety and habitat values. If needed, administrative access on this route could be granted on a case-by-case basis.

20(758)
Comment: Roads in Township 11, Range 8
620 N, 620 Q, 620P4A, 620P4, 620P3, 620P1-- We do not need these road segments for ranching use. 620 P1 ends at a wash and we recommend it be closed to motorized access.
Response: All these routes are designated as non-motorized in the Proposed RMP.

20(762)
Comment: Necessary Roads in Township 11 Range 7:634--We need continued motorized access along this road to access corrals.
Response: Route 634 is designated as non-motorized for the public and is available for authorized motorized and mechanized use for administrative use and permittees.

20(763)
Comment: Necessary Roads in Township 11 Range 7:
620 O --We need this road for routine ranch maintenance work. It accesses a holding pasture.
Response: Route 620 O is designated as non-motorized for the public and is available for authorized motorized and mechanized use for administrative use and permittees.

20(764)
Comment: Roads in Township 11, Range 8
The unidentified road not shown on the map, which goes down the (former landing strip) fenceline north from the Coping property to the County Line Fence: We need occasional motorized access not only to check this internal fenceline but also to access the north boundary fence of the allotment. The access to this road is private property and we intend to keep it private by denying access to anyone but ourselves. We keep the gate locked with a “No Trespass” sign attached.
Response: This route has been added to the IFNM route inventory and is designated as non-motorized; the route travels along a fence line and only accesses range improvements -- no other public purpose for this route is recognized. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees, and no additional special permit will be required. An administrative action has been included in Appendix D under “Livestock Grazing” to clarify this issue.

20(765)
Comment: Roads Needed by grazing allotment holder 629D-extreme eastern road segment along TO reservation boundary is necessary to access and maintain the boundary fence between the Tejon Pass Allotment and the TO reservation.

Response: This route has been added to the IFNM route inventory and is designated as non-motorized. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees, and no additional special permit will be required. An administrative action has been included in Appendix D under "Livestock Grazing" to clarify this issue.

20(769)
Comment: Roads Needed by grazing allotment holder
634-- This is a necessary access providing direct access between key corrals on the south end of the Tejon Pass Allotment.
Response: The designation of Route 634 has been changed from non-motorized to motorized to accommodate hunting and recreational access in the area.

20(771)
Comment: Additional efforts could be included to provide maps of established off-highway vehicle trails.
Response: As part of the implementation of the Proposed RMP, BLM will publish maps showing the routes available for public use by motorized vehicle.

20(778)
Comment: Examples of particularly significant sections of the Draft RMP where there needs to be a clear distinction between which routes legally qualify as a "road" include:
- the wildlife sections of the Environmental Consequences chapter Impacts on wildlife and Wildlife Habitat pp. 4-30 through 4 38, Impacts on Special Status Species pp. 4-39 through 4-49
Response: BLM has made the clear distinction of where motorized access is allowed by disclosing in the RMP which routes, and the number of miles of routes, that would be designated for motorized use and which would be designated for non-motorized use. The effects of motorized and non-motorized travel on wildlife habitat and special status species are discussed in Sections 4.3.5 and 4.3.6, respectively. The definitions of various types of "roads" are found in BLM's IM 2006-173 (Implementation of Roads and Trails Terminology Report). The transportation plan required by the Proclamation establishes where motor vehicle use will be allowed and may include roads or primitive roads designated for motorized use.

20(779)
Comment: Also, the Department requests adding language in the RMP to clarify how restrictions to 'surface disturbing activities' will impact AGFD wildlife administrative activities and projects, otherwise many tools the Department utilizes for the management of wildlife would be open to interpretation by various and changing BLM personnel. The Department perceives this to be an impact to management authorities, and recommends clarifying this within the RMP.
Response: The BLM does not anticipate major impacts on AGFD wildlife administrative actions and projects by any restrictions on "surface-disturbing activities" established in the RMP. Surface-disturbing activities are not prohibited in the RMP, and all proposed actions that potentially include surface-disturbing activities would be subject to the appropriate environmental analysis.

20(780)
Comment: NTHP Recommendation:
Make a threshold determination that each route designated for motor vehicle use through the route evaluation process satisfies each of the three criteria for a road(1) A linear route declared a road by the owner, 2) managed for use by low-clearance vehicles having four or more wheels, and 3) maintained for regular and continuous use). Where a route does not meet one or more of the criteria, then do not designate the route for motorized vehicle use in the Final RMP.
Response: Roads are designated by the BLM through inventory, evaluation and designation in the transportation system. The inventory and evaluation process considers the condition and use of existing

physical access routes, and the access needs of existing and allowable land uses. BLM comprehensive travel management plans identify the roads, primitive roads, and trails, necessary to provide access to public lands for administrative purposes and public use, and the designations are made depending on these and other factors. Through the travel management/transportation planning process, the BLM identifies the type of access intended to be provided by the road, primitive road, or trail, and the physical requirements for the route to accommodate its intended use. The maintenance standards or guidelines for the route are also identified to ensure it meets the minimum physical/geometric requirements for the type of vehicles and use level that it is intended for. Transportation systems are dynamic, and subject to change over time as land use changes and access needs change. The route designations for the IFNM take into account these factors, and will establish the allowable uses, type of access, and maintenance levels to adequately support the access needs for allowable uses, protect Monument resources and minimize land use conflicts.

20(781)
Comment: Pima NRDC: We recommend the BLM approve all travel route requests or route designation change requests submitted by the individual grazing permittees so as to protect the integrity both of the existing management plans as well as the financial investments of the US Government and the State of Arizona, a.k.a. the taxpayers, in the IFNM ecosystem.
Response: All requests for changes to route designations presented in the Draft RMP were analyzed and responses are provided in the Proposed RMP/EIS. Every attempt was made to be consistent with existing plans and permittee operations. Note that administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees, and no additional special permit will be required. An administrative action has been included in Appendix D under “Livestock Grazing” to clarify this issue.

20(785)
Comment: Necessary Roads in Township 11 Range 7:
636 E- We need motorized access along this ranch boundary fence line. This road is not shown on the Travel Management Travel Route Inventory Township Plat Index Map for Township 11 Range 8. This road accesses a corral and water storage tank with a livestock watering location.
Response: Route 636 will be open to all motorized and mechanized vehicle use year-round and is designated for motorized use. Access along the ranch boundary fence would be allowed as an administrative use.

20(786)
Comment: The following roads should be further restricted (beyond Alternative C): The short road central to Section 22 Township 11 Range 8, which connects 625 A to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified.
Response: -- The area described in the comment contains a number of routes including 625 A1 which is closed and not maintained as a trail. Degraded areas in the monument will be targeted for restoration as needed.

20(794)
Comment: Currently the DRMP makes no mention of law enforcement patrols, so the only other alternative for protecting the rock art is to restrict vehicle access.
Response: One of BLM’s administrative responsibilities is law enforcement; administrative actions need not be authorized under the RMP. BLM has coordinated in the past and at present with various other agencies to assist with law enforcement, including, but not limited to, the U.S. Border Patrol, AGFD, Pima County Sheriff’s Department, and Tohono O’odham Nation. Because law enforcement personnel cannot be in all places within the monument at all times, sensitive resources may be given additional protection by various methods including restricting vehicle access and erecting fences. However, BLM

also has the responsibility to maintain access for management activities (including the needs of AGFD, U.S. Border Patrol, and other agencies) and to seek a balance of providing for multiple use and resource protection; therefore, not all areas with rock art or other sensitive resources can be guaranteed full protection. BLM also uses public education opportunities to encourage public stewardship and respect for natural and cultural resources.

20(805)
Comment: Non-labeled existing and long-used roads needed in T/11 S R08E:... 2. The road running along the south side of the northern Pima County and Monument boundary is neither identified nor designated. This is a necessary ranch boundary fence. Maintenance is performed on an as-needed-for-ranch-purposes basis.
Response: Routes with non-motorized designations in the area described in the comment are available for administrative use including fence maintenance by permittees.

20(806)
Comment: [The 625A and 625B loop] will significant increase in the number of people accessing a documented archaeological site.
Response: Routes 625 A and 625 B are primitive roads designated open to motorized and mechanized use that is limited to day use only with no overnight camping allowed. BLM managed lands for multiple-use and considered the protection of resources during the route designation process.

20(SR14)
Summary Comment: BLM should maintain motorized recreational access to remote areas throughout the IFNM that may not otherwise be accessible to some individuals, including hunting areas, guzzlers, old mine sites, and other areas of interest.
Summary Response: The proposed alternative designates approximately 142 miles of existing routes for continued motorized travel. These routes access areas of varied remoteness; however, by definition, the most remote areas of the monument are not accessible directly by motor vehicle. Vehicle access for recreational use to areas in a variety of largely natural, undeveloped settings is available under the Proposed RMP. The anticipated visitor experience will vary depending on the recreation management zone (see Maps 2-12 through 2-14). Motorized routes have been identified by an interdisciplinary team to provide continued access for a variety of uses, including recreation and access to areas of interest, while meeting resource protection and administrative needs.
The proposed transportation plan would provide access for hunting throughout the monument, with no piece of ground farther than 1.5 miles from a designated motorized vehicle route (road or primitive road). Nearly all the wildlife water developments will be within this distance and accessible by non-motorized travel on the existing service route. Hunting opportunities for those who participate in road hunting will diminish, while opportunities for hunting away from roads, but in areas reasonably accessible by foot or horse, will increase.

20(SR41)
Summary Comment: BLM should restrict or prohibit use of off-road or off-highway vehicles (OHVs) except in a designated area, and close illegal roads and tracks for the protection of monument objects and resources. The monument Proclamation says nothing about accommodating OHV use.
Summary Response: The Proclamation directs that all off-road motorized and mechanized vehicle use be prohibited, except for emergency or authorized administrative purposes. In addition, the Proclamation requires a transportation plan be prepared to identify road closures and travel restrictions to protect monument objects. Consistent with the Proclamation, no areas are proposed as open for OHV travel off road; motorized travel must remain on designated routes. Alternative C designates approximately 129 miles of existing routes for continued motorized travel. These routes have been identified by an interdisciplinary team to provide continued access for a variety of uses, including recreation, while

meeting resource protection and administrative needs. While the Proclamation does not specifically direct BLM to accommodate OHV use, it does provide for management of monument lands under current regulations, which allow public access and use by motorized vehicles, including OHVs, if this use is not incompatible with the purposes of the IFNM. BLM has determined that OHV use, when restricted to a limited number of designated roads, is not incompatible with the purposes of the IFNM.

20(SR42)
Summary Comment: It is inequitable to have 140 miles of routes for motorized vehicle use and 180 miles available for non-motorized uses.
Summary Response: Restrictions on motorized travel are based on access needs, resource protection needs, and resource values present in the monument. BLM's multiple-use management of resources in the IFNM is consistent with the Proclamation and management to provide a range of recreation experiences and settings.

20(SR44)
Summary Comment: Alternative B does not ensure that all off-road vehicle use shall be prohibited except for emergency or authorized administrative purposes, which is very specifically and clearly stated in the Presidential Proclamation. Map 3 2 shows that large areas of the monument are highly prone to wind erosion and fugitive dust when disturbed, and yet some of these "highly prone" areas are not closed to OHVs even under the "most restrictive" Alternative B.
Summary Response: Cross-country travel by any motorized or non-motorized mechanized vehicle is prohibited under the Proclamation and will not be allowed under any alternatives proposed in the RMP. Soils in the IFNM were considered in developing proposed route designations, and routes on soils that are highly prone to fugitive dust under traffic were minimized. Mitigation measures will be taken for those routes that cannot avoid crossing dust-prone soils. Mitigation measures will be implemented on roads or primitive roads on dust-prone soils to reduce fugitive dust emissions. Refer also to comment and response 20(604) for additional information regarding routes and access.

20(SR45)
Summary Comment: Ragged Top, Sawtooth Mountains, Silver Bell Mountains, and West Silver Bell Mountains should be closed to off-road vehicles.
Summary Response: Under Alternative C, both motorized and non-motorized routes would be designated within the Ragged Top area, Silver Bell Mountains, West Silver Bell Mountains, and Sawtooth Mountains to provide continued access for administrative purposes and public use, while meeting resource protection and administrative needs. Minor developments (fences, trails, and livestock and wildlife waters) exist in those areas, and they will be maintained for their intended purposes as long as they are necessary. Routes into these areas also provide access to some of the monument's prime destinations and recreational opportunities. Routes not needed for motorized or non-motorized travel will be allowed to be naturally reclaimed, or measures will be taken to reclaim them.

20(SR47)
Summary Comment: There should be more signing in general in the monument to let people know what they can and cannot do in designated areas.
Summary Response: BLM will evaluate signage needs at the implementation planning level after the RMP is completed. Signs will be installed to communicate to visitors the various informational, regulatory, and interpretive messages and themes required to implement the RMP.

20(SR77)
Summary Comment: The travel management plan for the monument should protect the core zones as a quiet soundscape without motorized vehicles. Reducing the number of roads and tracks in the IFNM would enhance management, limit the spread of invasive species, reduce illegal dumping, and decrease

damage to archeological resources. It would also prevent damage to sensitive wildlife habitats from OHVs and recreational shooting.
Summary Response: Both Alternatives B and C include recreation management zones and transportation networks where areas with wilderness characteristics would be protected in a primitive setting without motorized vehicle routes. Refer to Maps 2 10, 2-11, 2-20, and 2-21. These areas could provide opportunities for quiet soundscapes.

20(SR79)
Summary Comment: BLM should be more conservative with its approach to managing roads. Roads can always be opened but are much more difficult to close and repair damages associated with roads once they are opened.
Summary Response: Under the Proposed RMP, no additional routes would be developed as a result of the decisions; however, during plan implementation, BLM would identify conditions under which a new route could be designated.

20(SR150)
Summary Comment: Alternative B provides adequate access within the IFNM and is the most compatible alternative for the protection of monument resources or values.
Summary Response: It is the intent of the BLM to provide protection of resources while balancing visitor use and administrative needs within the monument. The purpose of the travel management designations is to provide adequate access for administrative purposes, authorized uses, and allowable public use under applicable laws and regulations. The travel route network under Alternative B provides the greatest protection of monument objects, but it does not accommodate some important access needs in the monument and it makes access less practical for administrative purposes or for authorized users. The approximately 63 miles of roads designated for motorized use under Alternative B are primarily composed of county-maintained roads, which are generally unavailable for OHV use under current state regulations.

20(SR151)
Summary Comment: Off-road vehicles cause too much damage to IFNM resources and should be directed to other Federal lands that have already been degraded by similar activities.
Summary Response: The Proclamation provides for management of monument lands under current regulations, which allow public access and use by motorized vehicles, including OHVs, if this use is not incompatible with the purposes of the IFNM. Given the Proclamation's prohibition of off-road vehicle use, BLM has determined that OHV use, when restricted to a limited number of designated roads, is not incompatible with the purposes of the IFNM. To deliberately direct off-road vehicle travel to other Federal lands outside the IFNM is beyond the scope of this analysis.

20(SR162)
Summary Comment: Regarding the statement "Remove fences, roads, and facilities that are no longer necessary for transportation, wildlife management, monument administration, or other purposes in their present location.", who decides what is or is not necessary? According to whose criteria and what is that criteria? How will the BLM avoid being sued if someone disagrees what is or is not necessary?
Summary Response: BLM land managers will make determinations of the necessity for fences, roads, and facilities within the monument based upon careful evaluation of the original purpose of those facilities or improvements, their present condition, the management objectives they fulfill, how they relate to the objectives established in the RMP, and their specific authorizations. Facilities or improvements no longer needed to meet a management objective will be considered for decommissioning and removal. The decision-making process for decommissioning and removing facilities or improvements will be subject to NEPA review and to public review and comment. BLM will consider the concerns of stakeholders in the decision-making process.

20(SR530)
Summary Comment: Regular administrative motorized access should be maintained to all wildlife water catchments to allow for monitoring, water hauling, maintenance, enhancement, and redevelopment activities where it currently exists. AGFD should have full motorized access to wildlife water catchments where access routes currently exist.
Summary Response: Administrative access for specific routes and activities will be granted under an agreement between the BLM and the AGFD. The agreement will specify the routes that may be used, and minimally maintained, for administrative access to wildlife waters. Not all wildlife waters presently have motorized surface access; those will remain accessible by non-motorized means or by helicopter. Reconstruction, redevelopment, or removal activities will require a project plan, which will address additional access needs that may be required to carry out the project. Administrative access to livestock waters will be provided under separate agreement with the grazing permittees.

20(SR533)
Summary Comment: The maps are difficult to read.
Summary Response: The Proposed RMP contains new travel management and inventory maps at larger scales that are more easily read. Please see Appendix G, Maps G-1 through G-4.

20(SR551)
Summary Comment: The description for roads in the Draft EIS is not clear.
Summary Response: Motorized and mechanized travel in the IFNM can occur not only on roads, but also on routes identified as primitive roads designated for motorized use in the transportation plan. The definitions of roads, primitive roads, and trails are found in BLM's IM 2006-173, "Implementation of Roads and Trails Terminology Report." The transportation plan required by the Proclamation establishes where motor vehicle use will be allowed and may include roads or primitive roads designated for motorized use. Thus, motorized travel on roads and primitive roads is not considered "off road" travel, as explicitly prohibited in the Proclamation. No trails are designated for motorized use in the IFNM transportation plan. It is not necessary for a route to meet the criteria listed in BLM's definition of a road to be considered for designation as a road. The designation is arrived at through the development of the travel plan and is based on access needs and functional requirements, management objectives, and resource values involved. The plan may identify routes that are necessary as roads, others as primitive roads, and others as trails. Use restrictions and route standards are also established in the travel plan.

20(SR605)
Summary Comment: The road network should be the minimum necessary for public access to appreciate the natural landscape and sensitive resources for which the monument was established. The continuing impacts of unneeded routes, whether for motorized or non-motorized traffic, will damage resources and degrade the natural and cultural values of the monument. The RMP must take into account the likely damage to monument objects that will result from the existing travel network, including the direct and indirect impacts of roads.
Summary Response: It is the intent of the BLM to provide maximum protection of resources while balancing visitor use and administrative needs within the monument. Alternative B presents the minimum routes necessary for the management of the IFNM, including administrative access needs. Alternatives C and D provide additional access consistent with FLPMA, which requires that "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... and that will provide for outdoor recreation and human occupancy and use." In addition, the routes designated for motorized or non-motorized travel in Alternatives C and D are existing routes; no new routes are proposed at this time, which will limit impacts on localized and already disturbed areas. Potential for resource damage was considered in developing the proposed travel management designations and was analyzed in Chapter 4. Direct and indirect impacts, such as surface disturbance or increased erosion from routes, are included in the analysis. The condition

of the transportation system and ancillary activity areas will be monitored, and route designations could change if management objectives for the IFNM are not being met.

20(SR607)
Summary Comment: Additional routes should be closed and revegetated, not just designated for non-motorized travel.
Summary Response: Under Alternative C, designating many of the existing routes for non-motorized uses will provide access and recreational opportunities within areas of the IFNM, with fewer impacts on IFNM resources compared to continued motorized uses on all those routes. Routes indicated as non-motorized trails in the Proposed RMP will receive little or no maintenance (only as needed to protect resources and ensure usability). These routes are expected to receive varying use levels depending on their location, area or facilities served, and recreational opportunities available. Some routes will receive little use, and natural reclamation will be allowed to take place. Non-motorized routes found to be causing resource damage will be addressed through adaptive management of the transportation system.

20(SR613)
Summary Comment: There are too many miles of roads and routes proposed within Alternative C for BLM to effectively manage.
Summary Response: The quantity of designated routes was not a factor in developing a travel management system for the IFNM. Any route system, no matter how extensive, will present management challenges for the BLM, and regardless of the number of designated routes, BLM acknowledges that there will be some illegal activities within the IFNM that affect monument resources (e.g., illegal immigrant travel, dumping). The travel route designations will facilitate public and administrative travel that allows BLM to meet the management objectives for the IFNM as delineated in this plan.

20(SR616)
Summary Comment: Archaeological resources will not be adequately protected by the proposed transportation plan.
Summary Response: Available cultural resource information was considered in developing the designations for the transportation plan, and mitigation measures were considered in the route evaluation process as necessary to protect cultural resources. New archaeological surveys have been conducted, and additional surveys are planned for the transportation system, which will likely reveal additional resources that were not considered in the RMP. Some changes to the route designations occurred as a result of information obtained during surveys. Route designations are implementation-level decisions, and BLM has the authority to adjust designations after the RMP is completed, which will allow BLM to quickly respond to new information gathered in the cultural resource inventories.

20(SR625)
Summary Comment: BLM may only allow motorized travel on designated roads within Ironwood Forest. The proclamation establishing the Ironwood Forest National Monument expressly prohibited “all motorized and mechanized vehicle use off road” in Ironwood Forest. Each action alternative proposed in the Draft RMP violates this provision by authorizing motorized use on primitive routes. However, the Proposed Plan permits use of motorized and mechanized vehicles off of “roads.” The Proposed Plan’s overall approach to permitting destructive use of vehicles on routes that cannot possibly be believed to be “roads,” within the meaning of the Proclamations stands in flagrant opposition to both the language of the Proclamation and the overall intent of designating this National Monument to preserve its fragile and special values. Only those linear travel routes which meet the legal definition of a “road” and which are not causing damage to Monument Objects should be considered for designation as open to motorized travel.
Summary Response: The comment assumes that the Proclamation for the monument narrowly defines what constitutes a legal road, and fails to recognize BLM’s roads and trails terminology. The reference to

"road" found in the Proclamation does not define what constitutes a "road," and does not infer any definition in particular beyond what is officially used by BLM in its management of roads and trails. BLM's IM 2006-173 (Implementation of Roads and Trails Terminology Report) does define "road," as well as "primitive road" and "trail." These definitions are provided in Appendix G on page G-12. In accordance with the Proclamation's prohibition on motorized and mechanized vehicle use, off-road, motorized, and non-motorized mechanized travel will only be allowed on roads and primitive roads designated for motorized use. Motorized and non-motorized mechanized travel may occur off designated roads in the case of an emergency or for authorized administrative purposes. The Proclamation also directs the BLM to manage the monument pursuant to applicable legal authorities and to prepare a transportation plan that addresses the actions necessary to protect monument objects. The many legal authorities applicable to monument lands include FLPMA and transportation planning guidance for public lands, which provide for the BLM to designate transportation assets to accommodate access needs for administrative purposes and public use, subject to use restrictions identified through the land use and transportation planning processes. The transportation plan defines where motorized and mechanized travel are allowed and designates roads, primitive roads and trails, including their maintenance intensities and access vehicle objectives.

20(SR632)
Summary Comment: The plan does not explicitly provide a mechanism for limiting motorized and mechanized access when it is found or reasonably expected to negatively impact Monument Objects.
Summary Response: Travel Management Implementation-Level Decision 2 explains that BLM will develop criteria and a monitoring strategy to identify when motorized and/or mechanized travel is adversely impacting IFNM objects, when a route may no longer serve its intended purpose, or other changes that may occur with regard to the transportation system on the IFNM. The implementation plan will also identify the actions BLM may take to address those situations. The decision has been modified slightly to clarify the scope of BLM's monitoring approach and BLM's authority with regard to modifying the transportation plan after the RMP is completed.

20(SR636)
Summary Comment: All-terrain vehicles make too much noise; BLM should restrict the noise levels from all-terrain vehicles s used in the IFNM to provide for opportunities for quiet recreational activities.
Summary Response: BLM has authority to regulate noise under 43 CFR 8360 to protect public health and safety or to prevent creating conflicts or nuisances. As 43 CFR 8343.1 (b) states, "No off-road vehicle equipped with a muffler cutout, bypass, or similar device, or producing excessive noise exceeding U.S. Environmental Protection Agency standards, when established, may be operated on public lands." There is no regulatory noise emissions standard for BLM lands, but under an industry agreement all all-terrain vehicles manufactured since 1986 for sale in the United States must comply with a noise level of 82 dBA at 50 feet. Additionally, State laws and regulations apply on Monument lands, and current Arizona Off Highway Vehicle (OHV) regulations limit sound emissions to 96dBA, as measured according to current standard of the Society of Automotive Engineers (ARS § 28-1179A.3) Opportunities for solitude and quiet were considered in the RMP, and would be available in primitive or semi-primitive areas and areas closed to public motorized vehicle use.

20(SR637)
Summary Comment: BLM should consider the citizens' proposal of 71 miles of roads within IFNM to provide the greatest level of protection of resources, while providing sufficient access.
Summary Response: The citizens' proposal for designating motorized routes was considered but not analyzed in detail in the Draft RMP because it did not adequately address access needs for administrative purposes, authorized users, and public use. This is explained further in Section 2.2, "Alternatives Considered but not Analyzed in Detail."

20(SR644)
Summary Comment: Who will protect and repair the designated roads?
Summary Response: It is BLM's intent to monitor and enforce the route designations adopted in this RMP and BLM has agreements with other agencies for route maintenance. Refer also to summary comment and response 20(41) for additional information route designations.

20(SR742)
Summary Comment: The road network should be the minimum necessary for public access to appreciate the natural landscape and sensitive resources for which the monument was established. The continuing impacts of unneeded routes, whether for motorized or non-motorized traffic, will damage resources and degrade the natural and cultural values of the monument. The RMP must take into account the likely damage to monument objects that will result from the existing travel network, including the direct and indirect impacts of roads.
Summary Response: It is the intent of the BLM to provide maximum protection of resources while balancing visitor use and administrative needs within the monument. Alternative B presents the minimum routes necessary for the management of the IFNM, including administrative access needs. Alternatives C and D provide additional access consistent with FLPMA, which requires that "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... and that will provide for outdoor recreation and human occupancy and use." In addition, the routes designated for motorized or non-motorized travel in Alternatives C and D are existing routes; no new routes are proposed at this time, which will limit impacts on localized and already disturbed areas. Potential for resource damage was considered in developing the proposed travel management designations and was analyzed in Chapter 4. Direct and indirect impacts such as surface disturbance or increased erosion from routes were included in the analysis. The condition of the transportation system and ancillary activity areas will be monitored, and route designations could change if management objectives for the IFNM are not being met.

20(SR743)
Summary Comment: The monument should not reduce the amount of roads, as this would restrict accessibility to recreational opportunities to many.
Summary Response: Under Alternative C (the proposed alternative), areas managed to protect wilderness characteristics include 9,510 acres of public land administered by BLM in the West Silver Bell and Roskruge mountains. Though no new roads have been proposed to provide motorized access in the IFNM, and several roads within or near the areas managed to protect wilderness characteristics would be designated for non-motorized travel, motorized access would be provided to and around these areas as shown on Map 2-21. Accessibility to recreational opportunities by persons with mobility impairments is addressed in the recreation management zone objectives, and varies depending on the zone. Access by motor vehicle will be available to various Sonoran Desert settings available in the monument through the system of designated access roads and primitive roads.

20(SR744)
Summary Comment: The BLM needs to find remedies to management challenges other than restricting the taxpaying public from use of IFNM land.
Summary Response: The monument land will remain available for public use subject to the use restrictions needed to protect monument objects and minimize conflicts with other allowable uses, as determined through the RMP planning process.

20(SR745)
Summary Comment: Who would be responsible for the cost of new fencing for monument management?
Summary Response: Fencing needed to protect resources would be funded by the benefiting program through BLM's normal budget process using appropriated funds, or through partnerships using funds contributed by others, including grants or donations.

20(SR750)
Summary Comment: Seasonal closures to human entry to protect wildlife habitat will impose economic hardship on grazing permittees if the allotment is inaccessible, and the permittees should be compensated for any losses incurred as a result of new restrictions.
Summary Response: The closure to human entry would be implemented to protect desert bighorn sheep lambing activity. The closure would be on the minimum amount of land needed and will typically cover only the rugged mountain slopes and peaks around Ragged Top. These areas are not considered useable by cattle due to terrain conditions, and conflicts with grazing operations are expected to be negligible. If necessary, administrative access into the closed area could be granted for administrative purposes, including grazing-related activities, on a case-by-case basis.

20(SR751)
Summary Comment: New fencing to protect resources may interfere with grazing operations.
Summary Response: Any new fencing will be installed in accordance with an approved project plan, which will be prepared before construction with input from stakeholders, including grazing permittees, to avoid conflicts or undesired impacts on grazing operations and to address other possible concerns. New fencing will be in accordance with BLM Handbook H-1741 (Fencing).

20(SR753)
Summary Comment: The travel plan for the monument did not take into account the needs of ranchers in the area.
Summary Response: Access needs for use, maintenance, and operation of range improvements, including corrals, waters, and trailing routes were considered in developing the travel management designations. Access will be accommodated by the designated roads or primitive roads, or by routes designated for non-motorized use where motorized administrative access is granted to meet grazing program objectives. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees.

20(SR759)
Summary Comment: IFNM does not have approval to identify public access through private lands. Maps indicate that certain public access to IFNM is through SBM property. The maps need to be revised to indicate that the access is through private land.
Summary Response: BLM will seek access agreements, easements, or rights-of-ways, or adjudication of existing physical access for routes needed to access monument lands for administrative purposes or public use. An administrative action clarifying this intent has been added to Appendix D under "Travel Management." In addition, all access points have been removed from the referenced maps. BLM has determined that proposed management of access points should be based on the travel management plan and that it does not qualify as a land use plan decision. The management action regarding access points has therefore also been removed from the Proposed RMP. Access points will be identified in the travel management plan and will be modified to portray correct status and location. Access from private land, State Trust land, or other jurisdictions onto IFNM lands will be subject to any landowner restrictions, as well as any travel management and other use restrictions established in the RMP.

20(SR760)
Summary Comment: The following routes are needed for various livestock-management-related activities: 622, 622M1, 630, 628B, 629MIA, 634AX, 62001, 629D, 629B1A, 629M1A, 629L, 632A, 632A1, 639A1, 629F.
Summary Response: Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees, and no additional special permit will be required. An administrative action has been included in Appendix D under "Livestock Grazing" to clarify this issue.

20(SR761)
Summary Comment: The following routes are needed for allotment holders to conduct ranching activities: 2J, 2J3, 631, 620P, 629, 629M, 632, 632A1A, 629C, 629C1, 633, 633B.
Summary Response: These routes are designated motorized and allow vehicle access.

20(SR858)
Summary Comment: Motorized access along Route 629M1 is necessary because the road runs along an allotment boundary fence.
Summary Response: Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees. The route described is Route 629M1, and Route 629M farther west. 629M1 is designated as non-motorized in the proposed alternative. 629M is designated for motorized use. Other monument exterior fence lines were not inventoried as access routes. based on their condition at the time of the inventory in 2003.

20(SR859)
Summary Comment: Route 629D should be closed beyond the first 0.56 miles to protect monument objects, desert bighorn, and desert tortoise.
Summary Response: All of Route 629D is limited to non-motorized use. Motorized administrative use for wildlife water maintenance and livestock grazing operations may be permitted.

20(SR860)
Summary Comment: Route 320P4 provides administrative motorized access and is unnecessary unless mining claims are going to be actively worked. This could negatively impact monument objects.
Summary Response: Route 320P4 provides administrative access to active mining claims. Motor vehicle access for claim activity under casual use pursuant to 43 CFR 3809 is excepted. This route is located within both desert bighorn sheep habitat, including movement west of Ragged Top, and Category 1 desert tortoise habitat, and it has the potential to negatively impact these objects due to disturbance by motorized activity.

20(SR861)
Summary Comment: Route 620P3 provides administrative motorized access and is unnecessary unless mining claims are going to be actively worked. This could negatively impact monument objects.
Summary Response: Route 620P3 provides administrative access to active mining claims. Motor vehicle access for claim activity under casual use pursuant 43 CFR 3809 is excepted. This route is located within both desert bighorn sheep habitat, including movement west of Ragged Top, and Category 1 desert tortoise habitat, and it has the potential to negatively impact these objects due to disturbance by motorized activity.

20(SR862)
Summary Comment: Route 625A provides administrative motorized activity which is unnecessary unless mining claims are actively worked. This could negatively impact monument objects.

Summary Response: Route 625A is not needed for mining claim access. Vehicle access is needed to meet recreation objectives.

20(SR863)
Summary Comment: Spur off 625A should be closed.
Summary Response: The spur is closed under the draft transportation management plan.

20(SR864)
Summary Comment: Route 620F appears to provide administrative motorized access, which is unnecessary unless mining claims are actively worked. This could negatively impact monument objects.
Summary Response: Route 620F is not needed for mining claim access. Vehicle access is needed to meet recreation objectives.

20(SR865)
Summary Comment: Spur Route 620F3 should be closed to protect monument objects.
Summary Response: Route 620F3 provides a loop to drive around the range improvement areas.

20(SR866)
Summary Comment: Spur Route 620F2 should be closed to protect monument objects.
Summary Response: Spur Route 620F2 is needed for parking and vehicle maneuvering space.

20(SR867)
Summary Comment: Route 620F1 seems to provide administrative motorized access, which is unnecessary unless mining claims are actively worked. Motorized access could negatively impact monument objects.
Summary Response: The spur is closed to motorized use under the Draft RMP/EIS. Route 620F1 is needed for monitoring and maintenance of a wildlife project at the mine shaft.

20(SR868)
Summary Comment: Route 620F1A seems to provide administrative motorized access, which is unnecessary unless mining claims are actively worked. Motorized access could negatively impacts monument objects.
Summary Response: The spur is closed to motorized use under the Draft RMP/EIS. The route is not needed for active mining claim access; it is needed for monitoring and maintenance of a wildlife project at the mine shaft

20(SR869)
Summary Comment: There is no administrative reason to allow motorized access on Route 620B. Motorized intrusions have occurred past beyond this route, causing erosion and wildlife disturbance.
Summary Response: Motorized access on Route 620B is needed to achieve recreation management and grazing program objectives. The loop at the terminus is unimportant.

20(SR870)
Summary Comment: Route 620AX should be closed to motorized use.
Summary Response: Access to Route 620AX crosses ASLD land and was closed by the grazing permittee, blocking access to a BLM section. It provides access to range fence and to high-quality dispersed camping area. It will be closed to ensure similar camping opportunities preserved in vicinity.

20(SR871)
Summary Comment: Route 623B should remain limited to administrative motorized access.
Summary Response: The upland section of Route 623B is needed for administrative access and to meet non-motorized recreation management objectives.

20(SR872)
Summary Comment: Route 622J should be closed to motorized access. This route bisects significant habitat, and closing the route would lead to less wildlife disturbance and would protect sensitive cultural resources and monument objects.
Summary Response: Route 622J is designated in the draft transportation management plan to provide non-motorized access to achieve recreation management objectives. An exception for range improvement and utility access may be needed.

20(SR873)
Summary Comment: Spur Route 622J1 should be closed to motorized access.
Summary Response: Route 622J1 is designated in the draft transportation management plan to provide non-motorized access to achieve recreation management objectives. An exception for range improvement and utility access may be needed.

20(SR874)
Summary Comment: Route 621F should be limited to administrative access to allow bighorn sheep to water undisturbed.
Summary Response: Vehicle access is needed on Route 621F to access wildlife water and to achieve recreation management objectives. Designation in the draft transportation management plan has been changed to protect cultural values and reduce conflict with wildlife water. An exception has been made for AGFD vehicle access to wildlife water.

20(SR875)
Summary Comment: Close Spur Route 621F1 to motorized access.
Summary Response: Route 621 F1 will be closed and not maintained as a trail.

20(SR876)
Summary Comment: BLM must show how Spur Route 621E protects monument objects or provides legal access.
Summary Response: Route 621E is designated to achieve recreation management objectives.

20(SR877)
Summary Comment: Route 652B should allow administrative motorized access use only to Guzzler 630. This would protect monument objects and cultural resources.
Summary Response: Route 652B provides access to wildlife water and high-quality recreation opportunities. New data from a recent cultural survey show that the route crosses an important site. The access is controlled by State land adjacent to the exterior of the monument. A transportation easement is required to implement the use restriction.

20(SR878)
Summary Comment: Route 652B2 should be closed to motorized access to protect resources including monument objects.
Summary Response: Route 652B2 provides access to meet recreation management objectives.

20(SR880)
Summary Comment: Route 654A1 should be closed to motorized access due to off-road incursion, trash dumping, and its location near sensitive cultural resources.
Summary Response: Route 654A1 provides an essential functional link for access and travel north-south on the western side of the Sawtooth Mountains. It also provides access to dispersed recreational opportunities. No cultural sites are encountered along the route.

20(SR881)
Summary Comment: Route 654A is unnecessary for motorized access. Preventing access would provide better habitat conditions, decrease disturbance, and protect cultural resources.
Summary Response: Route 654A provides access to recreational opportunities. Its initial segment crosses ASLD land adjacent to the exterior of the monument, and a transportation easement is required to implement management.

20(SR882)
Summary Comment: Designating Route 654AB as closed would protect habitat and cultural resources and result in less disturbance.
Summary Response: Route 654AB provides access to recreational opportunities.

20(SR883)
Summary Comment: Route 656C doesn't need to provide motorized access. The area is already experiencing erosion. Preventing access could lead to better habitat conditions, protection of cultural resources, and less disturbance.
Summary Response: Route 656C provides access to high-quality recreational opportunities.

20(SR884)
Summary Comment: Route 660 should only provide access to guzzler 631. The rest of the route should be closed to protect habitat and monument objects.
Summary Response: Route 660 provides access to wildlife water and recreational opportunities. The route crosses ASLD land adjacent to the exterior of the monument, and a transportation easement is required to implement the transportation management plan. Camping is restricted within 0.25 mile of wildlife water.

20(SR885)
Summary Comment: The spur on Route 629C1 should be rehabilitated.
Summary Response: Route 629C1 provides access to meet grazing program objectives and is designated as non-motorized.

20(SR886)
Summary Comment: Route 620K crosses a major wash and attracts off-road users. It should be closed to protect resources.
Summary Response: Part of route 620K provides access to active mining claims, powerline right-of-way and private land adjacent to the exterior of the monument.

20(SR887)
Summary Comment: Route 601E doesn't meet the legal definition of a road and could impact monument objects.
Summary Response: Route 601E provides access to range improvements such as water, corrals, holding pastures, and staging areas needed for recreation under special recreation permit.

20(SR888)
Summary Comment: Spur Route 607 should be closed to motorized use to protect monument objects.
Summary Response: Route 607 is on an ASLD inholding and requires an easement to implement the transportation management plan TMP. The route provides access to recreational opportunities and is needed for range improvement.

20(SR889)
Summary Comment: Route 604A3 doesn't meet the legal definition of a road and could impact monument objects.
Summary Response: Route 604A3 is on an ASLD inholding and requires an easement to implement the transportation management plan. The route provides access to recreational opportunities and is needed for range improvement.

20(SR890)
Summary Comment: Route 625E doesn't meet the legal definition of a road and could impact monument objects.
Summary Response: Route 625E is part of the historic SASCO railroad grade extending to Silver Bell Mine and is designated in the draft transportation management plan for non-motorized use.

20(SR891)
Summary Comment: Route 638C should be limited to motorized administrative access to protect cultural resources from damage.
Summary Response: Route 638C provides access to range water and to a cultural site and an allotment boundary fence. New information from cultural surveys indicates that there is a conflict with resource values. The route also provides a regional link from the Tohono O'odham Nation to the Santa Cruz Valley.

20(SR892)
Summary Comment: Route 631B provides duplicate access to a well, and the route experiences user-created spurs and should be closed.
Summary Response: Route 631B provides access to range improvements, a well, a pipeline, a fence, and recreational opportunities.

20(SR893)
Summary Comment: Route 632A should be limited to motorized administrative access to allow bighorn sheep to water undisturbed and prevent user-created spurs.
Summary Response: 632A provides access to wildlife water and recreation opportunities.

20(SR894)
Summary Comment: Route 600D1 doesn't meet the legal definition of a road and could impact monument objects.
Summary Response: Route 600D1 provides access to a private land inholding with an inactive quarry and to a rangeland fence. The route lies near a cave with bat habitat values.

20(SR895)
Summary Comment: Route 600D2 doesn't meet the legal definition of a road and could impact monument objects.
Summary Response: Route 600D2 provides access to a private land inholding with an inactive quarry. The route lies near a cave with bat habitat values.

20(SR896)
Summary Comment: Route 600D3 doesn't meet the definition of a road and can cause impacts on monument objects.
Summary Response: Route 600D3 provides access to a private land inholding with an inactive quarry. The route lies near a cave with bat habitat values.

20(SR897)
Summary Comment: Route 600M provides access into the Waterman ACEC, which could impact monument objects. This routes should be closed to motorized access.
Summary Response: Route 600M provides access to recreational opportunities.

20(SR898)
Summary Comment: Route 600K provides access into the Waterman ACEC, which could impact monument objects. This route should be closed to motorized access.
Summary Response: Route 600K provides access to recreational opportunities.

20(SR899)
Summary Comment: Route 600J provides access into the Waterman ACEC, which could impact monument objects. This route should be closed to motorized access.
Summary Response: Route 600J provides access to recreational opportunities.

20(SR900)
Summary Comment: Close Route 652B.
Summary Response: Route 652B provides access to wildlife water and high-quality recreation opportunities. New data from a recent cultural survey show that the route crosses an important site. Access is controlled by State land adjacent to the exterior of the monument. A transportation easement is required to implement the use restriction.

20(SR917)
Summary Comment: The following roads should be further restricted (beyond Alternative C) as follows: Township 11, Range 8: Non-Identified Roads. 1.) The short road central to Section 22, which connects 625 A to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified. 2.) The short road central to Section 22, which connects 620F3 to a wash, and which serves no purpose other than to facilitate and encourage illegal motorized travel in that wash, is not identified. Route 2Z: The BLM ought to consider closing this road to all motorized access except the electric company. It is unnecessary for ranching purposes. It ends at a wash, which only encourages OHV recreationists to drive up and down a sensitive xeroriparian wash that is a major corridor for bighorn sheep. When the OHV recreationists travel north in this wash, they eventually encounter the fence that runs along Road 2J3. This fence is frequently found cut open or mangled at this location. However, the electric company absolutely must have unfettered access as needed.
Summary Response: The route described is Route 625C. It is designated for non-motorized use in the proposed alternative. The route described is Route 620F4, and it is designated as non-motorized in the proposed alternative. Route 2Z has been designated as non-motorized in the Proposed RMP to reduce conflicts with bighorn sheep as they move through a corridor linking the Silver Bell Mountains with the West Silver Bell Mountains. The route does not service any power line.

20(SR918)
Summary Comment: 620 H1 and 620 J: These two roads should be open for motorized use, but only for use by the electric company.
Summary Response: Routes 620H1 and 620J provide access to an electric service line, but they lie within the east-west desert bighorn sheep movement corridor. To prevent conflicts with bighorn sheep, prevent

erosion, and to deter unauthorized access to private land, 620H1 is designated as non-motorized in the Proposed RMP. The eastern end of 620H (from its junction with 620H1) is also designated as non-motorized in the Proposed RMP. Route 620J provides access to a planned non-motorized trail on the historic Sasco railroad grade and will remain open for motorized use.

20(SR919)
Summary Comment: The two roads intersecting the label for 620 K2 should be closed to motorized access, except for the electric company and except for emergency access by the allotment holder for fence repairs.
Summary Response: Under the proposed alternative, BLM has designated 620K1 as non-motorized to protect wildlife habitat values, but this route can be used for administrative services to access for mining claims and utilities.

20(SR920)
Summary Comment: 625 A and 625 B: These roads are not used for ranching purposes. The BLM ought to consider restricting these roads further than Alternative C, preferably making them non-motorized trails, because due to the loop these roads create in the Ragged Top VHA (combined with road closures in other areas, and considering BLM's apparent noncommitment to providing adequate law enforcement manpower), this loop will become inundated with traffic and predictably will lead to significant resource damage in the proposed Ragged Top VHA (as identified under Alternative C). This could negatively affect special status species, including the Sonoran desert tortoise. Additionally there will be significant increase in the number of people accessing a documented archaeological site. The petroglyphs would be very easy to steal from this site unless BLM provides a significant increase in law enforcement presence. Currently the Draft RMP makes no mention of law enforcement patrols, so the only other alternative for protecting the rock art is to restrict vehicle access. Furthermore, keeping 625 A open will encourage illegal OHV travel on 625 D (the railroad grade), which currently is not a problem. However, 625 D has many sharp drop-offs where bridges once existed, and even a small volume of motorized travel on it would cause significant erosion and encourage off-road traffic in the many washes that cross-cut the railroad grade. Currently most of these washes are in a pristine condition. Furthermore, keeping 625 A open while closing so many other roads in the monument may encourage illegal traffic to access 625 A1, invading private property and endangering the residents. We appreciate the BLM closing 625 A1 to motorized traffic in Alternative C.
Summary Response: In the Proposed RMP, Routes 625A, 625B, and 620F make a loop that provides access to high-quality recreational opportunities. However, to protect desert bighorn sheep, public use of these routes will be limited to day use, and vehicle-based camping would be prohibited along those routes. Because of the sensitive cultural and biological resources found in the vicinity of Ragged Top, this area will be regularly monitored to determine if current management actions, including route designations, are achieving resource goals and objectives. Adaptive management techniques will be implemented and management actions can change if monitoring determines changes are necessary.

20(SR921)
Summary Comment: Other roads that should be closed to motorized access: 2J1 and 2J2. 2J2 is a smuggling pickup route that intersects the illegal immigrant pedestrian trail. There are frequently fresh OHV and other tire tracks coming off this route and paralleling key washes in the area.
Summary Response: Under the Proposed RMP Route 2J1 would be designated for motorized use to provide opportunities for motorized access, including recreation and administrative purposes in the West Silver Bell Mountains area. Under the Proposed RMP, Route 2J2 would be designated for non-motorized use.

20(SR922)

Summary Comment: Please keep the following roads freely accessible year-round for motorized use by the grazing allotment holders and their associates and employees: Unlabeled existing and long-used roads needed in T/11 S R08E: 1. An unidentified road branches southeast off Road 620P, intersects 620O, and then bends due east along the monument/reservation boundary fence line on the southern boundary of T11 E R08E S31 and S32. This road terminates at a water storage tank and metal livestock drinker ("The Bull Tank"). The drinker is located at the intersection of a corner of the reservation where a significant amount of illegal immigrant traffic comes through on a well-established footpath, necessitating regular fence repairs. The aforementioned, unlabeled road must remain freely open to motorized access by the grazing allotment holder, his family members, associates and employees to maintain the water source and maintain the allotment boundary fence to prevent cattle deaths (e.g., if a cow gets on the wrong side and cannot find water), cattle thefts, and cattle trespass across the monument boundary. 2. The road running along the south side of the northern Pima County and monument boundary is neither identified nor designated. This is a necessary ranch boundary fence. Maintenance is performed on an as-needed-for-ranch-purposes basis. 3. The unidentified fence-line road heading due south from Silverbell Road in Section 13 and extending into Section 25, ascending Ragged Top along the western boundary of Section 13, Section 24 and Section 25: Problems: This allotment boundary fence separates the Morning Star and Claflin allotments. This fence absolutely must be maintained. The Draft RMP/EIS in Alternative C proposes this road be closed and revegetated. Closure this particular road, under the conditions about to be explained may be acceptable, but this allotment boundary fence absolutely must not be removed. This fence, unlike all other boundary fences, is regularly checked from horseback rather than a motorized vehicle. Disrespectful recreationists, however, frequently cut this fence for both motorized and pedestrian crossings. In February 2007, more than 100 feet of fence had been removed at the terminus of illegal wildcat road 620AX and along the entire length of illegal wildcat road 621B1 in T1 E R09 S19. (Neither of these two roads existed in 2003 and are likewise absent from the 1989 USGS Silverbell East quadrangle map.) It took two full days and an expensive trip to the hardware store to repair the fence. Ten fence posts had to be replaced with new posts because the original posts apparently had been burned for firewood. This repair required motorized access, and as such, reasonable motorized access can be expected occasionally to be necessary to maintain the fence in a condition that prevents cattle trespass between allotments. Recommendation: The BLM ought to close this fence line as both a motorized and non-motorized trail (heavy use as a hiking or mountain biking trail would without doubt accelerate erosion due to its steep fall-line course) but allow the allotment holders or their associates, family, or employees occasional motorized access to Roads 620B and 621B1 year-round (regardless of lambing season) as needed for emergency repairs. This would reduce the amount and frequency of fence-cutting, yet enable sufficiently close access to haul in necessary barbed wire, tools, T-posts, and the heavy post driver for repairs.

Summary Response: The route described is Route 620O1. It is designated as non-motorized in the proposed alternative. Motorized administrative access on this route may be granted to meet grazing program objectives. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees. The route described is Route 629M1, and Route 629M farther west. 629M1 is designated as non-motorized in the proposed alternative. 629M is designated for motorized use. Other monument exterior fence lines were not inventoried as access routes, based on their condition at the time of the inventory in 2003. The route described is Route 621B1. It is designated as closed to all traffic to be rehabilitated under the proposed alternative in the Draft RMP. This route will be designated as a non-motorized trail in the Proposed RMP Motorized administrative access on this route may be granted to meet grazing program objectives. Administrative access to fence lines, corrals, wells, and water infrastructure for inspection and maintenance will be provided under separate agreement with the grazing permittees. The fence will not be removed as part of any rehabilitation that occurs. 620AX and part of 621B1 were initially identified in 1980 during the wilderness inventory for the area as a vehicle access "way." It has remained in similar condition since that time, with some natural revegetation occurring, and an increase in use in recent years.

It crosses State lands and is currently closed by the grazing lessee and AGFD at the junction with Silverbell Road, on State land. The remainder of the route on BLM land was designated in the Draft RMP to provide vehicle access to high-quality recreation opportunities. This route will be designated for non-motorized use in the Proposed RMP to protect natural resources, with administrative access to meet grazing program objectives. Access to the fence line away from the designated trail will remain by non-motorized means. Route 621B1 is designated for non-motorized use in the Proposed RMP to provide a connection between 620AX and 620B. 620B is designated for motorized use in the proposed alternative.

20(SR923)
Summary Comment: 622L: This road must be closed because it was created illegally and crosses through an internal King Ranch fence that was cut open.
Summary Response: Route 622L is a fence line receiving vehicle traffic. It is not identified as a travel route in the Proposed RMP. It would be closed under the Proposed RMP.

20(SR924)
Summary Comment: Township 11, Range 7 629, B1: Please close to motorized access. 629 C2: Please close to motorized access. This road encourages fence cutting.
Summary Response: Under the Proposed RMP, Routes 629B1 and 629C2 are designated as non-motorized.

Category 21: Special Designations

21(141)
Comment: No areas should be considered for Wilderness study areas, we already have to much land locked up that 98% of Americans cant or wont visit.
Response: Only Congress can designate areas as wilderness. At this time, BLM has no authority to report wilderness areas for designation to Congress. Therefore, WSAs cannot be designated, either.

21(277)
Comment: [Choose Alt B except:] Designate Sasco Railroad corridor as a recreational trail as in Alternative D.
Response: BLM did not consider Sasco Railroad as a recreational trail under the National Scenic and Recreational Trails Act or other special designation under any alternative. Portion of the historic railroad grade is presently used for Sasco road, and portion is not in use and reclaiming naturally. The reclaiming portion of the grade is defined as a non-motorized trail under all alternatives, including the proposed plan.

21(SR78)
Summary Comment: The entire IFNM should be treated like an ACEC.
Summary Response: ACEC designations within the IFNM will no longer be necessary because the monument designation and management proposed in the Draft RMP/EIS would provide protection of special status species. Refer also to summary comment and response 21(SR 772) for additional information regarding ACECs.

21(SR81)
Summary Comment: A total of 33,417 acres should be designated as WSAs in the IFNM, including 6,161 acres at Ragged Top, 11,169 acres in the Sawtooth Mountains, 7,489 acres in the Silver Bell Mountains, and 8,598 acres in the West Silver Bell Mountains. Protecting these acres as WSAs will assist the BLM in its responsibility to protect the objects and wildlife of the IFNM.
Summary Response: Only Congress can designate areas as wilderness. Utilizing wilderness characteristic criteria under FLPMA, Section 201, BLM identified 36,990 acres on IFNM as having wilderness characteristics (of varying levels of quality). IFNM is proposing to manage 9,510 acres that received the

highest ratings under wilderness criteria. Although the BLM does not have the authority to designate new WSAs, nor to manage any additional lands under the Section 603 nonimpairment standard, lands with wilderness characteristics can be protected in their natural state using a wide range of designations that offer the same protections.

21(SR772)
Summary Comment: The EPA recommends that the Final EIS describe the difference between the ACEC and VHA designations and why the VHA has been identified as a more appropriate management vehicle for the Waterman Mountains.
Summary Response: By definition, an ACEC is "an area within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from other natural hazards" (43 CFR 1610). BLM feels that the protective measures proposed monument-wide in the RMP, and those that accompany the monument designation by way of the Proclamation, essentially replace the need for an ACEC in the monument. Specifically, the special management prescriptions for Waterman Mountains ACEC, intended to provide special protection to the Nichol's Turk's head cactus, include limiting motorized vehicles to designated roads and trails, initiating mineral withdrawal within the ACEC, and prohibiting surface occupancy for oil/gas development. These provisions are all covered by the Proclamation, thus rendering "special management" unnecessary. BLM does recognize that this area contains a significant resource that warrants protection, and has proposed several actions that would allow BLM to offer increased protection if necessary. The Waterman Mountains VHA was established to delineate the area where these actions would apply.
The impacts of managing Nichol's Turk's head cactus habitat as part of a VHA are described in Section 4.3.6.3 of the Draft RMP/EIS.

Category 22: Social and Economic Conditions

22(140)
Comment: 3-40 Locatable Minerals
Rock collectors have long utilized the Monument area. How will this issue be addressed and managed?
Response: Per the Proclamation, no objects of the monument, including rocks and minerals, will be removed except in the instance of specially permitted specimens to be used for educational or scientific purposes.

22(392)
Comment: 4-97 Impacts on Recreation. Potential historical, economic, and social impacts were not addressed or analyzed in Chapter 4 in regards to the decision to ban recreational shooting (Alternative C: Use and Discharge of Firearms: "Prohibit the use and discharge of firearms within the IFNM, except for permitted or authorized hunting activities conducted in accordance with AGFD hunting regulations.") The Department recommends a more thorough analysis to encompass all impacts associated with this decision.
Response: Section 4.5.3 notes that there could be potential changes in IFNM visitation due to restrictions on recreation, including recreational shooting, and notes the mixed social impacts between those that value and those that oppose recreational shooting on IFNM. As noted therein, recreational activity (and associated social and economic aspects of that activity) could be shifted to other recreation sites, in which case expenditures associated with this recreation use would not change. In accordance with NEPA, best available data were used for this RMP/EIS, and data were not available to support a more detailed analysis. However, some text was added to address the economic impacts on personal property from recreational shooting. This impact analysis is not repeated for Alternative C (Section 4.5.4). As noted in the introduction to Section 4.5.4, the analysis of Alternative C provides distinctions between the alternatives (Alternatives B and C are the same with regard to the use and discharge of firearms).

22(393)
Comment: Many ranchers or their employers or employees have minority ancestry and thus Executive Order 12898 may apply to them.
Response: Per Section 3-302 of the Executive Order, data collection and analysis for environmental justice analysis are to be conducted to the extent permitted by existing law, including the Privacy Act, as amended (5 U.S.C. 552a). Accordingly, impacts on populations rather than individuals are analyzed.

22(394)
Comment: Summary - Social and Economic Conditions
"Conversely, employment in the mining sector has declined in terms of both relative significance and total number of jobs."
SBM takes strong exception to the judgment that the mining industry has declined in significance and total number of jobs. Primarily, it is not the role of BLM to determine whether a certain industry has less significance than others and whether impacts to that industry need to be evaluated. The facts remain that the mining sector is impacted by the IFNM and a requirement of the National Environmental Policy Act is that the impacts be evaluated in the resource management planning process. Moreover it should be recognized in any comparative analysis that jobs provided by mining are high paying jobs
Response: The phrasing has been changed to clarify that the 30-year trend data from 1970 to 2000 shows this decline and to note the resurgence in the copper industry that began in 2004.

22(395)
Comment: We are also aware that the BLM may be overestimating the importance of the livestock operations in IFNM in the social and economic resource section of the DRMP/DEIS. Page 4-188.
Response: The social and economic impacts of livestock operations were analyzed using the best available data on livestock operations and AUMs on BLM allotments, which are closely tracked.

22(396)
Comment: weigh long-term benefits to the public against short-term benefits;
What about the long term benefit of an assured local food supply?
Response: Additional information was added to the text on the indirect and value added impact of livestock grazing, citing Economic Impacts from Agricultural Production in Arizona, Jorgen R. Mortensen, University of Arizona, July 2004. A typographical error on the market value of cattle and calves in Pinal County was corrected.
Your estimate of local food supply is noted (in a food supply crisis where the base herd would be slaughtered for consumption, the 646 cattle in the planning area could produce 306,850 pounds of beef or enough beef to feed 4,339 Arizonans for one year).

22(399)
Comment: Table 2-18 Summary Comparison of Impacts Table
Social and Economic Conditions Alternatives B and C - "Closing the bighorn sheep lambing areas seasonally could limit valued social experiences."
This statement fails to address the economic impacts of closing off private landowners from lands located within) the sheep lambing areas.
Response: Private landholder access would not be impacted by lambing area closures.

22(400)
Comment: AMA is also concerned with assertions that the mining industry has declined in significance and the total number of jobs based on statistics on employment in the service sector and the growth in government jobs. Any comparative economic analysis should note that these jobs pay significantly less than jobs in mining. In 2005, the copper mining industry in Arizona provided 6,900 jobs resulting in personal income of $486 million. When both direct and indirect impacts m the industry accounted for

22,200 jobs accounting for personal income of $ 1.1 billion. The Arizona copper industry had a direct and indirect impact to the Arizona economy of $3. 52 billion, which was comprised of $ 1.1 billion in personal income (equivalent to 22,200 jobs for Arizonans), $2.2 billion in business income and $223 million in state and local government revenues. The direct impact of mining was $1.6 billion, comprising of $486 million in personal income (equivalent to 6,900 jobs), $1.04 billion in income to other Arizona businesses for products and services and over $80 million to local and state governments in taxes and fees.

AMA is concerned that the draft RMP omits from the list of legislative requirements such as the Mining and Minerals Policy Act of 1970 and the National Materials and Minerals Policy, Research and Development Act of 1980. Recognizing that new mineral rights cannot be established in the IFNM, those statutes require that the valid existing mineral rights in the IFNM be managed consistently with the policy of promoting an orderly and economic development of domestic mineral resources.

Response: The list of legislative requirements provided in Section 1.4 of the RMP/EIS is intended to include only the overarching requirements. Appendix B, "Planning Criteria," includes the Mining and Minerals Policy Act of 1970 and National Materials and Minerals Policy Research Development Act of 1980. The phrasing has been changed to clarify that the 30-year trend data from 1970 to 2000 shows this decline and to note the resurgence in the copper industry that began in 2004.

22(401)

Comment: 4.5 Impacts on Social and Economic Resources 4.5.1 Impacts Common to All Alternatives

"According to the reasonably foreseeable development scenarios mineral resource development, it is unlikely that there would be significant pressure to develop the grandfathered mining claims. Regardless of alternative, any proposals to develop valid existing rights would be subject to site-specific, case-by-case review of mine plans, plans of operation, and other development plans to ensure that other resources are protected prior to the issuance of a permit or lease."

SBM does hold mining claims within the IFNM. The editorial opinion of the author of this section of the draft RMP that it is unlikely that these claims will be exercised is inappropriate. The RMP process should give full consideration to all valid existing rights within the monument and not discredit rights based on personal opinion. That and other similar statements suggest an inappropriate bias against mining in the draft RMP.

Response: The statement that "according to the reasonably foreseeable development scenarios mineral resource development, it is unlikely that there would be significant pressure to develop the grandfathered mining claims" has been deleted from the document. This statement was not based on personal opinion; rather it was based on a reasonably foreseeable development analysis that was prepared in support of the RMP/EIS. Since the time that the reasonable foreseeable development was analyzed (2003), there has been a marked change in market conditions for copper, which has directly affected the reasonable foreseeable development potential for copper.

22(403)

Comment: 3.5.2.2.2 Activities/Resources and Land Use Issues

"With regard to use of IFNM lands for development of mineral and energy resources, there are those concerned about potential impact to natural resources and those that support access and opportunities for mineral resource development within the IFNM and/or the surrounding area (e.g., Asarco Silver Bell Mine). No mining currently occurs within the IFNM and mining jobs are decreasing relative to other local employment. However, links to the current and former participation of mining in local communities still exist."

It should be noted here that mineral development can only take place where mineral deposits are present. If mining is not allowed on lands where these deposits exist, the associated reserves are lost. Foregoing domestic mineral development will make the country dependent on foreign sources for strategic mineral resources and impact our national security in much the same way as reliance on foreign sources of oil. Additionally, although no mining currently occurs within the IFNM, it should be noted that valid existing

claims are held within the monument boundaries. Once again, SBM objects to the statement that mining has declined in relative importance to other local employment. As shown previously, direct and indirect impacts of mining must be analyzed to get a full picture of the significance of the mining industry to Arizona and the nation.
Response: The referenced text within the document addresses the baseline social value; this comment is more appropriately addressed in the environmental consequences, and a statement was added to this effect in Section 4.5.1. In addition, the referenced statement about the decrease in mining jobs was revised to indicate its relationship to the 1970 to 2000 data and the recent increase in the market price of copper. Refer also to summary comment and response 22(402) for additional information regarding the recent resurgence in copper pricing.

22(406)
Comment: 3.5.1.2.1 Social Value of Ranching
Ranching conveys value to local communities through the conservation of open spaces and the connection to historic ranching in Arizona or a "western" quality of life.
The same cultural value may be applied to mining and preservation of a "western" way of life and should be included as a subsection of 3.5.1.1 Energy and Minerals.
Response: A statement regarding the social value of mining has been added to Section 3.5.1.1 of the Final RMP/EIS.

22(522)
Comment: The economic analysis of livestock grazing in IFNM is incomplete and almost completely inaccurate.
Response: The social and economic impacts of livestock operations were analyzed using the best available data on livestock operations and AUMs on BLM allotments, which are closely tracked.

22(651)
Comment: Downgrading nine allotments reduces the collateral value and may drive some allotment holders into negative cash flow situations and potential bankruptcy. The loss would not only inflict financial harm in itself, but would also reduce the market value of the base deeded property attached to the allotment.
Response: Section 4.5.4 has been revised to more clearly reflect the effects of changing the classification of allotment to perennial from perennial/ephemeral. Changing the classification of an allotment does not reduce the area of the allotment or the number of permitted AUMs, nor does it prevent BLM from issuing temporary non-renewable licenses during periods when there is additional forage available.

22(652)
Comment: The agency acknowledges that most of the permittees pay for full use of the allotment, even if the actual use is much lower. Id. Therefore, Table 3-17 on page 3-56 of the DRMP/DEIS is meaningless in terms of actual use, but does serve to demonstrate that revenues from livestock grazing on the IFNM would hardly cover the cost of administering the program. This is par for the course on BLM lands, and should be figured into the economic analysis. See GAO 2005.
Response: Table 3-17 is not intended to be used for extrapolating the cost of BLM's livestock grazing administration for allotments within the IFNM. The information in Table 3-17 provides context regarding the amount of livestock grazing that has occurred on IFNM allotments over the past 10 years.

22(SR66)
Summary Comment: We have paid for the right to shoot in IFNM because of taxes on ammunition and monies spent on weapons, camping gear, and other related items that bring income to the State of Arizona. Loss of this activity would be a hardship on tourism and the economy of Arizona and is liable to have a negative impact on the availability of funds used to protect the land and the wildlife on IFNM.

Summary Response: Alternatives B and C would prohibit the use and discharge of firearms within the IFNM, except for permitted or authorized hunting activities conducted in accordance with AGFD hunting regulations. The current economic impacts of recreation in Arizona are summarized in Section 3.5.1.3.2. This includes the analysis of economic impact from the National Survey of Hunting, Fishing, and Wildlife-Associated Recreation, which includes fishing, hunting, or watchable wildlife forms of recreation. The economic impact of recreational shooting is not tracked individually, but prohibiting shooting in the IFNM would be expected to have a negligible effect on the statewide and local economy. This is because recreational shooting and associated expenditures (e.g., ammunition) would likely still occur in the local area as this activity shifts to other locations in the local area or state. Furthermore, expenditures related to recreational shooting (e.g., firearms, licenses, outdoor gear, travel) are intertwined with expenditures for hunting, and there would be no change in policy related to shooting associated with hunting.

22(SR69)
Summary Comment: I'd like to see restrictions on mining and development within the IFNM.
Summary Response: As per the Proclamation … Valid existing mining claims will be allowed to continue. However, no new claims will be permitted.

22(SR397)
Summary Comment: The real economic and social value of IFNM is flawed. To consider the value of the monument only in terms of the multiple human uses belies a perspective that is extractive and (nominally) revenue-based. The Draft RMP/DEIS does neither a true cost benefit analysis for the near term, nor a life-cycle cost/benefit for the long term. The analyses also ignore the commodity values associated with natural processes. For this analysis to be complete, or truly enable the decision maker and public to understand it, both the real investment in a healthy landscape (as opposed to underfunded programs) and the true cost of enabling uses, the obligation to communications, planning, law enforcement, road and other improvement installation and maintenance, budgetary shortfalls of use programs (i.e., livestock grazing) mitigation for degradation and restoration would have to be factored in and accounted for in the analysis. With that data in hand, the unit value of use could be calculated and compared to revenue sources. The public could then join with the agency in determining public benefit, as opposed to privilege benefit. In addition, where cost exceeds revenue, use could be constrained until cost/revenue/benefit coincides. In the absence of a revised economic model, it is likely that natural values, including wildlife's interests, will diminish in deference to subsidized human use.
Summary Response: The analysis of social and economic values considered nonmarket values in addition to human use values of the monument (refer to Section 4.5 of the Draft RMP/EIS). This analysis was conducted using the best available data. A detailed cost-benefit analysis or model was not conducted, as such an analysis is not required as part of this planning process, nor are data available for such a detailed analysis.

22(SR402)
Summary Comment: BLM should address importance of copper mining industry in Arizona; note how jobs in the services sector pay less than jobs in mining.
Summary Response: BLM has rephrased the statements about the decline in the mining industry and tied those statements to the trends from 1970 to 2000. In addition, to capture the recent resurgence in the copper industry, 2007 data on the baseline economic value and employment of the copper industry have been added to Sections 3.5.1.1 and 3.5.1.5, respectively.

22(SR404)
Summary Comment: Access to valid existing rights for minerals should not be precluded because of route designations made in the RMP.

Summary Response: The Draft RMP/EIS has been revised to eliminate misleading statements about the effects of management decisions on development of valid existing mining claims. The alternatives would not preclude mineral resource development, but case-by-case review of mineral development actions would be subject to the terms of the management decisions under the various alternatives, and mitigation and/or minimization of impacts would potentially vary by alternative. Route designations would not preclude access to valid existing rights for minerals.

22(SR405)
Summary Comment: BLM should update the employment data for Silver Bell Mine to reflect increased employment.
Summary Response: The text has been updated with the most recent (second quarter 2007) employment data (153 employees) for Silver Bell Mine on record with the Mine Safety and Health Administration.

22(SR499)
Summary Comment: Grazing fees collected by the BLM were inaccurately assumed in the Draft RMP/EIS as the sole economic return to the taxpayers from livestock grazing in the IFNM. Ranches in the IFNM employ a workforce of about 18 people that live and work out on the IFNM rangeland 24 hours a day, 7 days a week.
Summary Response: Section 4.5.3, regarding social and economic effects of Alternative B, has been revised to acknowledge the potential loss of jobs among ranch employees and the potential for additional BLM management responsibilities once the grazing allotments have expired.

22(SR500)
Summary Comment: The social and economic value of ranching would be completely lost in IFNM if grazing was terminated.
Summary Response: Social values of ranching are acknowledged in Section 4.5.3, regarding the effects of Alternative B, which would make allotments within the IFNM unavailable for grazing upon expiration of existing leases. Allotments could also be made unavailable for grazing under Alternative C if a lease were cancelled or voluntarily relinquished, but grazing could also be reinstated at a later date.

22(SR501)
Summary Comment: Wildlife foraging patterns and wildlife habitat would be impacted through habitat fragmentation and loss of privately maintained water sources in the IFNM.
Summary Response: Revisions have been made to various sections of the plan to better acknowledge the effects from the potential loss of livestock waters that would be abandoned if grazing allotment leases were retired. For example, Section 4.3.5.3 notes the effects on wildlife and Section 4.5.3 notes that changes in wildlife patterns and/or population could influence hunting and its related economic benefits.

Category 23: Public Safety

23(431)
Comment: Who should actually be blamed for “resource destruction caused by unregulated shooting” as Mr. Madigan characterized the situation? “Unregulated” shooting can also be called “unmanaged” shooting and this “unmanagement” is the fault of BLM. Responsible shooters, like any other recreational user of BLM lands, cannot be expected to take on the management responsibilities of the agency.
Response: The Draft RMP/EIS does not place blame on any user group, agency, or individual, but strives to protect the natural and cultural resources for which the monument is designated. The Draft RMP/EIS does not vest the public with any enforcement or management authority or responsibility, nor does it imply those responsibilities. The BLM rangers who patrol the monument would enforce the provisions of the RMP, once approved, in addition to the existing laws and regulations they enforce.

23(432)
Comment: Regarding the banning of recreational shooting on our public lands.
1. How many people have been injured by getting shot on public lands?
2. Is this mostly happening closer to populated areas?
Response: To BLM's knowledge, no one has reported a serious injury or death from recreational target shooting on the IFNM. We do not have statistics for other public lands, but injuries related to target shooting do occur on occasion on public lands within the immediate Tucson area. On the IFNM, there have been numerous close calls and private property, including livestock, has been shot. This is happening close to populated areas and in more remote areas of the monument as well. In addition to those neighborhoods and communities that are located adjacent to the IFNM, residential areas occur on some of the private lands within the monument boundary.

23(433)
Comment: The debris left behind from such target shooting not only destroys the esthetics of this beautiful area, but also creates problems for native flora and fauna.
Response: The impacts of target shooting are analyzed in Chapter 4 of the RMP/EIS. Where necessary, additional information related to target shooting has been included throughout the chapter to more specifically address the impacts associated with this activity.

23(436)
Comment: Pages 2-31, 2-32 Table 2-8. Resource Management of CULTURAL RESOURCES
Last bullet on page 2-32
"trash dumps"
The BLM needs to address the fact that the historic trash dumps contain a lot of rusty metal objects, many of which contain lead, and can be harmfully consumed by wildlife, migratory birds and livestock. These items tend to migrate into xeroriparian washes and travel great distances from their original sources. These items can and will eventually find their way into major waterways. Additionally, old rusty containers can breed mosquitoes carrying deadly diseases such as West Nile virus or avian flu. The BLM needs to outline a plan to manage all that old junk.
Response: BLM would manage historic trash dumps for scientific use under the proposed alternative (Alternative C), which would include data recovery (i.e., removal of the materials) of the objects. Historic objects deemed hazardous to human health or the environment can be removed, destroyed, or disposed of. If a historic feature such as a trash dump, mine working, or structure is deemed a threat to human health or the environment either as a physical hazard or chemical exposure hazard, the hazard may be mitigated through stabilization, restoration, modification, or removal of the feature from the monument. The IFNM cultural resource management plan will contain further details on the management of these trash dumps. Any actions affecting them will be conducted in a coordinated effort with the BLM Safety Officer and the BLM Archeologist, in consultation with the Arizona State Historic Preservation Officer, as required.

23(437)
Comment: However, no environment can be safe for any visitor unless BLM becomes pro-active in the management of the public's lands entrusted to it.
Response: BLM makes every effort to effectively manage the responsibilities entrusted to the agency, including providing a safe visitor experience. Certain hazards accompany any venture onto public lands, but the RMP is one tool BLM uses to manage use so that safety can be achieved.

23(438)
Comment: 3.6.1 Active and Abandoned Mines and Prospects
"Mine tailings located at both active and closed mine sites are potentially hazardous because chemicals in the tailing piles can potentially leach into soils and/or groundwater or become airborne hazardous wastes."

If there are no active mines as previously mentioned, this statement should be corrected to remove "active." Tailings dams are designed, constructed and started up in a manner that precludes the leaching of any residual metals. Tailings dams constructed within the last 50 years should not be considered a hazard to groundwater. The words "hazardous waste" after airborne should be deleted, as it does not make sense.
Response: The term "active" has been removed from Section 3.6.1.
Despite sound engineering controls, there is always the possibility of leakage that could migrate to soils and/or groundwater. Also, airborne particles that consist of hazardous waste materials could potentially be ingested if not properly contained.

23(440)
Comment: Page 2-97 Summary comparison of Impacts for Public Safety
Missing from this section:
The loss of ranching which would occur under either Alternative B or Alternative C as written, would harmfully impact public safety. The DRMP makes no indication that BLM has any intention to increase its law enforcement staff, so if the ranchers disappear, public safety will decline.
Response: BLM employs two rangers who routinely patrol the IFNM. BLM agrees that it would be beneficial to have additional staff to assist in this area. However, budgetary issues dictate the hiring decisions at the monument, and these issues are outside the scope of the RMP.

23(441)
Comment: Illegal aliens should not be allowed to trespass onto the monument, and those that do should be required to clean the desert of refuse.
Response: Undocumented immigrants are not allowed to trespass on the IFNM; however, that does not stop such use from occurring. Law enforcement within the monument requires and includes coordination with other agencies, and is heavily influenced by current staffing and funding; BLM identifies staffing needs on an annual basis and requests funding based on the staff needed. Also note that littering is not allowed.

23(442)
Comment: Not once, but twice, the BLM states that "[d]ispersed recreational shooting throughout the IFNM would continue to create a public health and safety risk from accidental shootings and could increase the risk of lead contamination to soil from the increased presence of spent shell casings." (4-126, 127(emphasis added).) Guys, I hate to tell you this, but there ain't no lead in them thar' shell casings, casings are either brass, steel, or aluminum alloy (rifle and pistol ammunition) or paper or plastic (shot shells). A very few rifle rounds also use plastic/brass cases. Lead, however, comes in bullets (the little pointy things what fly out of the casing and down the barrel when the trigger is pulled).
Response: Text regarding lead contamination was revised to refer to spent bullets and bullet fragments rather than shell casings.

23(443)
Comment: Because of all the bandits running loose, I really don't feel safe visiting the monument any more.
Response: BLM has analyzed the potential for impacts on public safety from illegal activities within the cumulative impacts section of the RMP/EIS. Additional information regarding these impacts has been included in the Proposed RMP/ EIS in Section 4.7.2.16.

23(457)
Comment: Rather than punish the majority for the irresponsible actions of a few, why not do whatever it takes to apprehend these slobs [who are littering] and not only make them clean up the area but fine them a substantial amount?

Response: The Code of Federal Regulations already provides BLM with regulations prohibiting littering. 43 CFR 8360 Sec. 8365.1-1, "Sanitation," states: (a) Whenever practicable, visitors shall pack their trash for disposal at home. (b) On all public lands, no person shall, unless otherwise authorized: (1) Dispose of any cans, bottles and other nonflammable trash and garbage except in designated places or receptacles; (2) Dispose of flammable trash or garbage except by burning in authorized fires, or disposal in designated places or receptacles; (3) Drain sewage or petroleum products or dump refuse or waste other than wash water from any trailer or other vehicle except in places or receptacles provided for that purpose; (4) Dispose of any household, commercial or industrial refuse or waste brought as such from private or municipal property; (5) Pollute or contaminate water supplies or water used for human consumption; or (6) Use a refuse container or disposal facility for any purpose other than for which it is supplied. BLM only employs two law enforcement personnel to patrol all of IFNM and looks forward to cooperation with the public to assist in litter control and pickup.

23(476)

Comment: The FEIS should also categorize which sites contain tailing piles or open pits which may be potentially hazardous. As appropriate, the FEIS should also identify steps BLM will take to ensure public safety with regard to mine hazards.

Response: Comprehensive information, including the various hazards present at each mine site, is not readily available and it would be cost prohibitive to determine the status. In accordance with 40 CFR 1502.22 regarding incomplete or unavailable information, all mine sites within IFNM should be considered hazardous, and it is assumed that one or more of the hazards identified in Section 3.6.1 of the Draft RMP/EIS) could be present at each site.

23(SR8)

Summary Comment: There are sufficient laws and regulations regarding use of public land (e.g., recreational shooting, OHV use) that make it a crime to harm the land; the RMP should not introduce new law and regulation. People who break the law will continue to break the law. Rather than restricting use of the land, existing laws should be enforced. For example, misuse of firearms, fire hazards, littering, etc. require enforcement and heavy penalties.

Summary Response: Approval and implementation of the RMP will not result in passage of new laws or regulations. The purpose of the RMP is to establish a framework for managing the land, resources, and uses within the monument as established in the Proclamation and in accordance with FLPMA. Under this framework, BLM manages the land and enforces current laws, regulations, and policies. The decisions within the RMP define what types of activities or uses are allowed or prohibited within all or part of the monument. Enforcement activities are a component of BLM's management but cannot be used as a substitute for proactive land management, just as management decisions are not made as a substitute for law enforcement activities. Also note that legal uses of public lands can inadvertently cause resource damage, depending on the intensity of the use and other factors, which is one of the primary reasons why BLM develops allowable use restrictions and other management prescriptions.

Law enforcement within the monument requires and includes coordination with other agencies, and is heavily influenced by current staffing and funding. Employing additional law enforcement personnel is a question of funding appropriated by the U.S. Congress, and congressional funding legislation is beyond the scope of this RMP/EIS. Rather than making assumptions regarding future levels of congressional funding, the RMP/EIS attempts to address resource needs and identify actions to protect those resources, which can have the effect of making existing law enforcement resources more efficient by simplifying regulations. This strategy is intended to help protect natural and cultural resources and enables BLM rangers to devote more of their time to dealing with illegal dumping and other law enforcement issues.

23(SR59)
Summary Comment: It is not safe to travel in the IFNM without a firearm. Prohibiting them removes the right to self-defense.
Summary Response: Under BLM's proposed alternative, recreational target shooting would be prohibited within the monument. This would not preclude individuals and public safety officers from carrying a firearm or from using it for purposes of self-defense.

23(SR61)
Summary Comment: Recreational shooters are not to blame for the trash at the IFNM. Instead of imposing regulations on them, the BLM should create and enforce strict littering laws.
Summary Response: BLM enforces regulations regarding litter on public lands and coordinates with volunteer groups to remove litter from the monument and other public lands. BLM works with law enforcement personnel in the enforcement of regulations associated with public lands and looks forward to cooperation with the public to assist in litter control and pickup. Also see summary comment and response 18(SR8) for additional information regarding management of the monument.

23(SR62)
Summary Comment: Illegal immigration, drug running, and law enforcement activities cause damage and destruction to IFNM resources. BLM should address the topic of illegal immigration and enforcement activities.
Summary Response: BLM is required to analyze the impacts of BLM's management decisions on the IFNM. No management decisions are made in the RMP related to illegal activities (including immigration) and associated law enforcement activities. Apprehension of undocumented immigrants is the responsibility of the U.S. Border Patrol. However, BLM has analyzed the potential for impacts from those activities within the cumulative impacts section of the Draft RMP/EIS in Section 4.7.2. Additional information regarding these impacts has been included in the Proposed RMP/FEIS in Section 4.7.2. BLM continues to work with appropriate authorities to deal with illegal smuggling activities on the IFNM and the resource impacts that directly and indirectly result from these activities.

23(SR64)
Summary Comment: The BLM must coordinate between the various affected agencies and the Tohono O'odham Nation to address illegal immigration, smuggling, and drug running on the IFNM if there is to be any hope of mitigating the problem.
Summary Response: BLM coordinates with various agencies, including, but not limited to, the U.S. Border Patrol, AGFD, Pima County Sheriff's Department, and Tohono O'odham Nation for law enforcement and resource management in the IFNM.

23(SR131)
Summary Comment: Anyone involved in the activity of target shooting shall be responsible for the cleanup of the targets. Any debris left behind shall be considered litter and the persons in question shall be liable for and may be cited for the act of littering within the forest. The law should be written to punish the act of littering, not the act of target shooting
Summary Response: The Code of Federal Regulations already provides BLM with regulations prohibiting littering. According to 43 CFR 8360 Sec. 8365.1-1, "Sanitation": (a) Whenever practicable, visitors shall pack their trash for disposal at home. (b) On all public lands, no person shall, unless otherwise authorized: (1) Dispose of any cans, bottles and other nonflammable trash and garbage except in designated places or receptacles; (2) Dispose of flammable trash or garbage except by burning in authorized fires, or disposal in designated places or receptacles; (3) Drain sewage or petroleum products or dump refuse or waste other than wash water from any trailer or other vehicle except in places or receptacles provided for that purpose; (4) Dispose of any household, commercial or industrial refuse or waste brought as such from private or municipal property; (5) Pollute or contaminate water supplies or water used for human

consumption; or (6) Use a refuse container or disposal facility for any purpose other than for which it is supplied. BLM only employs two law enforcement personnel to patrol all of IFNM and looks forward to cooperation with the public to assist in litter control and pickup.

23(SR427)
Summary Comment: Recreational shooting in the monument makes it unsafe for other people in the monument and should be discontinued.
Summary Response: Under the current conditions (No Action Alternative A), recreational shooting is allowed within the monument outside developed areas in accordance with 43 CFR 8365. However, under Alternatives B and C, the use and discharge of firearms would be prohibited, except for permitted or authorized hunting activities conducted in accordance with AGFD hunting regulations. Alternative D would provide for recreational shooting in two designated areas.

23(SR428)
Summary Comment: The trash left in the IFNM is used as targets by recreational shooters; dumping is the problem.
Summary Response: BLM acknowledges that not all recreational shooters contribute to the litter problem in the IFNM, but that the issues of trash and shooting are often interrelated. BLM has rules prohibiting littering (43 CFR 8360 Sec. 8365.1-1, "Sanitation"). Furthermore, under 43 CFR 8365.1-4(a)(2), "No person shall ... create a risk to other persons on public lands by engaging in activities which include ... creating a hazard or nuisance." Shooting items that are not intended to be used as targets, including glass bottles, paint containers, appliances, vehicles, computer monitors and TVs, propane tanks, gas cans, aerosol cans, and furniture creates several hazards, including potential bullet ricochet, broken glass, and release of hazardous substances into the ground and air. Jagged metal, splintered wood, and broken glass are dangerous hazards to BLM employees and volunteers engaged in cleaning up these dumping and shooting sites. Shooting these items turns one large piece of trash into many smaller pieces of trash that are more easily spread over a larger area, making cleanup a considerably more difficult task and increasing the risk to wildlife and permitted livestock. Shooting natural objects and vegetation is a violation of 43 CFR 8365.1-5(a)(1) and (2).

23(SR429)
Summary Comment: BLM should focus on adding signs and developing brochures to encourage IFNM users to pick up after themselves. They also should consider public involvement programs to encourage volunteers to participate in trash pickup.
Summary Response: Regardless of the alternative selected, BLM will conduct certain administrative actions, including education of IFNM visitors and users for the protection of public lands and resources. As part of the implementation phase of the RMP, BLM will identify signing and other public outreach needs, and develop educational materials such as access guides and regulatory pamphlets. In addition, BLM can enlist volunteers to assist in monitoring, maintenance, and education. Volunteer help has been critical in maintaining the resources of the monument, and BLM will continue to use volunteers, where appropriate.

23(SR430)
Summary Comment: There should be a greater emphasis on law enforcement in the IFNM rather than more regulations. Please consider the findings of the Tucson Basin Shooting on Public Lands Workshop Project.
Summary Response: As a participating agency in the Tucson Basin Shooting on Public Lands Workshop Project, the BLM considered the final report when selecting the proposed alternative. The final report makes no substantial recommendation for law enforcement. The only enforcement-related result was the creation of a wallet-sized card containing law enforcement contact numbers that public land visitors could carry to allow them to observe and report illegal shooting, dumping or other activities to the proper law

enforcement units without putting themselves in jeopardy. BLM will continue to enforce Federal and State laws, as well as the regulations of the selected management plan to the best of its ability.

23(SR455)
Summary Comment: IFNM resources are under pressure as a result of undocumented immigrant travel, which should be addressed in the RMP; additional roads will exacerbate this issue.
Summary Response: BLM acknowledges the impacts of undocumented immigrants and others on IFNM resources and has considered undocumented immigrant traffic and the associated law enforcement activities during the route evaluation process. The effects from undocumented immigrants also is acknowledged in the cumulative effects analysis. Under Alternative C, more than half of the exiting routes in the IFNM would not be available for motorized travel. Refer also to summary comment and response 2(62) for additional information regarding the analysis of management decisions.

23(SR456)
Summary Comment: In the summary of impacts and impact analysis, BLM assumes that if shooting is prohibited, then no shooting will take place, but that is not true. There potentially could be more risk by not providing a designated area for shooting.
Summary Response: BLM would make every effort to enforce the decision to prohibit recreational target shooting within the IFNM, and would encourage recreational shooters to make use of target shooting locations outside the monument.

Category 24: Consultation and Coordination

24(118)
Comment: How will the BLM ensure that the interested public is kept informed of future issues affecting the Monument once this management plan is in place?
Response: The BLM Tucson Field Office uses a variety of communication and outreach methods to keep the public informed of major issues and actions affecting BLM lands. As the plan is implemented, news releases, letters, and pertinent announcements will be sent to the media and interested parties to inform them of specific milestones and events associated with implementation. The BLM maintains an updated list of interested groups, individuals, and media for this purpose. Regular updates will also be placed on the BLM website for public viewing. The BLM also encourages interactive communication with the public, so please contact the Tucson Field Office with any questions you might have.

24(119)
Comment: How long is this management plan good for? When would it be revisited/redone? What's the plan for the future? What if this management plan is inadequate or doesn't work? How can you turn this into a living management document that can respond to changes in conditions? How will you involve the public in this process? What are your measurement tools for monitoring success or failure of the management plan? How will that information be communicated effectively to the interested public?
Response: The planning timeframe for most RMPs is around 20 years. The RMP will undergo a plan evaluation at least every five years to determine if the decisions in the plan are meeting goals and objectives and whether the overall plan is still valid. RMPs typically undergo a comprehensive revision approximately 18 to 20 years after they are approved, unless some significant change in policy, resource conditions, or management occurs in the interim. If major changes need to be made in the interim, BLM can amend the plan to address and resolve inadequacies in the RMP. Public involvement is always a key part of a plan amendment. The public is also welcome to provide input to any NEPA-based management action proposed for the IFNM.
BLM uses various tools to monitor the RMP and its decisions for their effectiveness (i.e., whether or not desired condition are being achieved). Implementation monitoring (tracking implementation of the RMP) is documented at least annually and will be available for public review. Effectiveness monitoring

(determining whether desired outcomes are being met) will occur throughout the life of the RMP. Further discussion on monitoring and evaluation of the RMP and plan decisions has been included in Section 2.3.5.

24(120)
Comment: It is my opinion that the combination of the Draft Management Plan and the EIS in the current document is confusing and unclear. A review of the contents of the current document doesn't even seem to call out the Draft Management Plan. The contents appear to have the format of an EIS. There should be one document that is the draft management plan, and there should be a separate document containing an environmental analysis of that plan. It is unclear in this document where one begins and the other ends. The draft management plan should contain the transportation plan and the cultural resource management plan, and any other plans deemed appropriate.
Response: The document cover letter describes the basic format of the Draft RMP/EIS. The four alternative management plans are outlined in Chapter 2. The analysis of environmental impacts is presented in Chapter 4. The RMP and EIS are combined because the EIS process parallels the development of the RMP, with the environmental analysis guiding the direction of the RMP alternatives. Within the process of analyzing the impacts the various alternatives have on the affected resources, the proposed alternative is identified and the outline of the RMP is developed. An implementation plan will then be developed based on the Proposed RMP. The relationship between the Draft RMP, adoption of a Proposed RMP, and implementation of the selected alternative is described further in Section 2.4. While the travel management plan is viewed as integral to the development of the RMP because of its wide-ranging effects on other resources, other plans, such as a cultural resource management plan, are more feasibly developed after a final plan alternative has been selected and approved.

24(122)
Comment: BLM has had about seven years to prepare this document, and yet basic inventories of resources (i.e., plants, geology, cultural resources, etc.) have apparently not occurred. The entire document suffers from a lack of comprehensive reviews of the scientific and historical literature of the IFNM and surrounding region. What literature is cited reflects only a cursory review of the existing information available. There is not enough basic background information presented upon which to make sound management decisions. A significant pillar of this plan should be to immediately complete inventories of all those resources the monument was established to protect.
Response: BLM has been gathering the best available information on the IFNM and surrounding region since the IFNM was established. That information was incorporated into the analysis that led to the Draft RMP. While many baseline data needs have not been met, sufficient information to develop a broad-scale management framework for the IFNM was available for the development of this plan. Recognizing the lack of data in some areas, the RMP incorporates strategies that allow BLM to modify management if needed based on new information, changing conditions, and monitoring of plan decisions. BLM will continue to work with Federal, State, and local agencies, as well as universities and special-interest organizations to conduct the needed inventories, surveys, monitoring and data collection to provide the best information for management of IFNM. Additional information and discussion of BLM's adaptive management strategy has been included in Section 2.3.5.

24(123)
Comment: The AZGFD should be included in all planning stages with land management operations as a peer agency and not be treated as the general public is in this process as I have witnessed.
Response: As a cooperating agency on the RMP project, AGFD has been actively engaged in the development and review of the RMP. With cooperating agency status comes various responsibilities that are outlined in an Memorandum of Understanding (AZ-910-0306) between BLM and AGFD. AGFD has diligently carried out its duties and has worked closely with BLM to address issues and concerns. Future

coordination with AGFD is a basic component of several management decisions in the RMP. More information on the role of AGFD and cooperating agencies is found in Section 1.6.1.

24(124)
Comment: This begs the question, exactly what safeguards are in place to prevent special interest groups from having concessions written into such a document.
Response: NEPA requires a fair and unbiased approach to public input. Comments are solicited and reviewed, regardless of source, for relevance to the analysis at hand. Where comments are found to be substantive, those comments are considered for incorporation into the analysis. Special interest groups do not receive any more weight in consideration of their comments than any other individual or organization.

24(126)
Comment: Although there is no formal requirement for this, after a long process of collecting public input to develop the RMP it is disappointing to see that the draft plan has included essentially no provisions to encourage citizens to aid future management efforts by devising mechanisms for stakeholders to offer information on conditions and problems they observe.
Response: Mechanisms or programs to facilitate stakeholder input are more appropriately considered in an RMP implementation plan because these programs are not considered land management actions, but rather would aid BLM in accomplishing those actions. As the implementation plan for the RMP is developed, a process for such interaction will be considered. BLM encourages the public to provide information on observations and problems to the IFNM Manager, and regularly relies on citizen reports and information to provide for better management of the IFNM. If any groups or individuals have information that they believe would benefit the decision-making process, BLM would ask those individuals to provide such information.

24(128)
Comment: IF YOU ARE GOING TO SHUT A ROAD DOWN PLEASE WORK WITH AZ_ G&F DEPT. TO SEE WHAT THEIR NEEDS ARE BEFORE CLOSING A ROAD THEY SHOULD BE ABLE TO ACCESS THE ROADS AS THEY NEED TO WITH OUT REQUEST FOR ACCESS EACH TIME.
Response: BLM has worked closely with AGFD, a cooperating agency on the IFNM RMP project, with regard to all aspects of the RMP, including the route designations. The RMP ensures AGFD access for administrative purposes where appropriate, and BLM will develop an agreement with AGFD that identifies specific access needs for the agency. Refer also to comment and response 20(520) for additional information regarding designated routes

24(134)
Comment: 1-9 1.6.2
Why was the Hopi tribe not consulted? Are there other tribes that may have an interest in the area? According to this the BLM contacted only four tribes without describing their process for tribal involvement.
Response: At the onset of the planning process, BLM made contact with over 200 Federal, State, local, and tribal entities, including the Hopi Tribe, to extend an invitation to be a cooperating agency on the RMP effort. Follow-up contact was made with a number of tribes, again including the Hopi Tribe, announcing the beginning of the scoping period and inviting input from these tribes. While the Hopi Tribe does claim cultural and ancestral ties to the area, the Hopi Tribe has not expressed an interest in the IFNM planning area during the course of the development of the RMP. BLM did meet with several Indian tribal, band, and chapter councils and members both before and after the Notice of Intent was published, and continues to meet with them with regard to this plan.

24(155)
Comment: Item 1.6.2: The four Indian tribes listed apathetically chose not the be a cooperating agency but all elected to remain "involved." Due to their small population relative to the non-Indian population, and in recognition that their input into similar efforts has historically been self-serving, their input into this Proposed RMP should be carefully examined. In fairness to the general public the Indian input, if any, should be weighted accordingly.
Response: The point of public comment is to elicit issues or concerns regarding the adequacy of the environmental analysis, the accuracy of the information in the document, or to provide new or additional data to the analysis. It is not to determine how many people are for or against any given alternative to allow any one group to have more say than any other group.

24(770)
Comment: I attended the first meeting on this subject more than two years ago, and I was very concerned by the lack of tangible and publically verifiable information the BLM was using to make its decisions regarding land management and use.
Response: The development of the Draft RMP/EIS for the IFNM is based on the Proclamation, FLPMA, and NEPA requirements for protection, preservation and management of the natural and cultural resources that give this area its unique character. Under these requirements, BLM is using the best available data to make decisions for the RMP and future management of the IFNM. BLM does have sufficient data and information related to resources on the IFNM to develop a broad-scale land use plan. Site-specific projects proposed for the planning area will require further analysis and potential data collection.

24(810)
Comment: You are wasting people's time with those meeting, you already know your going to ban hunting on all federal land in this state.
Response: The BLM regards public meetings as an important part of the NEPA process and public comments received on this plan have led to numerous changes in the document. The proposed alternative makes no attempt to ban hunting in the IFNM. Under the proposed alternative, discharge of firearms would be allowed within the IFNM for hunting and other permitted activities in accordance with AGFD regulations Additionally, the proposed alternative allows hunting dogs off leash in the IFNM. Decisions made by BLM as part of the RMP would apply only to Federal land administered by BLM within the boundary of the IFNM.

24(812)
Comment: Why did the BLM decide to prejudge the alternatives, when to wait would have allowed for true unprejudiced comments and dialogue?
Response: BLM must select a preferred alternative to be identified in a Draft RMP/EIS pursuant to 43 CFR 1610.4-7. This alternative is determined through a value analysis process, which takes a critical and interdisciplinary look at the impacts that each alternative would have on the IFNM's resources and the affected public.

24(813)
Comment: I am surprised that they would even consider shutting down a safe area for recreational shooting in this fine state. Is this a partisan decision to make democrats show what power they have acquired?
Response: The range of alternatives considered in the Draft RMP/EIS is a result of extensive public outreach that has occurred since the Proclamation created the monument. Should members of the public determine the range of alternatives inadequate, the NEPA process allows them to come forward with a comprehensive alternative of their own, which could then be considered by the BLM. BLM's

management decisions are not based on the number of comments received for or against any particular management scenario or use.

24(814)
Comment: My next question in regard to that is, has Game and Fish signed off completely on B, C, and D? Because it's a restricted area, and I would think they would want to get all of the area they can.
Response: AGFD formally agreed to be a cooperating agency during this planning process and has developed a Memorandum of Understanding with BLM outlining the agencies' various responsibilities with regard to the planning process. The BLM met and consulted with AGFD on numerous occasions leading up to the publication of the Draft RMP, and AGFD continues to be involved to the extent agreed upon in the memorandum. BLM did receive comments on the Draft RMP from AGFD that communicated its concerns with the alternatives and outlined specific points of disagreement. While BLM and AGFD have attempted to resolve those concerns to the extent possible, it is not a requirement of the planning process that the two agencies come to full agreement on the provisions of the RMP. BLM remains the final decision maker on matters within its jurisdiction.

24(815)
Comment: The second thing I would like to talk about, the commission and the department needs significant and specific clarification on the various definitions and levels of administrative access as it pertains to the department's public trust and responsibility to manage the wildlife of the state, and on the monument specifically.
For guidance in clarifying this definition, I would refer the BLM staff to the draft MOU between the Arizona State office of the BLM and Arizona Game and Fish Commission. And when I say draft, it's a very nearly done draft. It's 99 percent plus. The language is very close.
I would also refer you to a late 1996 -- excuse me, the late 2006 MOU between the USDA, Forest Service, the US Department of Interior, BLM, and Fish and Wildlife Service, and more than 40 national conservation and outdoor recreation organizations representing literally hundreds of thousands of individuals.
The stated purpose of the national level MOU is to enhance public access to federal lands and to improve opportunities for those public lands for people to fish, hunt, and to engage in sport-shooting activities in a safe and environmentally sound manner.
Response: As requested by AGFD, provisions related to administrative access for AGFD to fulfill its responsibilities have been clarified in the Proposed RMP. These provisions are consistent with the master Memorandum of Understanding (MOU) between Arizona BLM and AGFD (Agreement AZ-930-0703). The Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU (Agreement WO-250-2007-03) was transmitted to BLM offices on January 18, 2007, just as the Draft RMP was being prepared for printing. Because of the timing, BLM did not immediately meet the MOU requirement to add each of the private organizations party to the MOU to the RMP distribution list. This oversight was quickly brought to BLM's attention, and all the private organizations were contacted regarding the release of the Draft RMP during the 90-day comment period. BLM is currently in compliance with the MOU and will continue to work with the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable as needed.

24(816)
Comment: The word "manage" is used frequently, yet no specifics are offered as to what the word specifically means in all its different contexts within the document (for example, see P. 2-9, "manage land uses" and "manage watersheds.") The word implies action is involved, but no specifics are offered. Who sets the rules and procedures for "management"? How will it be done? Will it be funded? So far, the BLM has done an extremely poor job of managing the Monument, yet it proposes to take on even more "management" responsibilities? How will that work exactly? Similarly, the word "prevent" (i.e., 2-22 "Prevent the avoidable loss") This is vague, undefined, and unclear how it will happen. Also, the word

"partnerships" P. 2-23. With whom? What guarantee is there it will happen? What if no one wants to partner? What then? These kinds of words, vague, undefined, and unsupported, are not helpful.
Response: The word "management" in this document refers to actions taken by the BLM with the intention of affecting the resources or resource uses of the IFNM. Tables 2-1 through 2-17 describe the specific management actions that would be employed under each alternative. The BLM's management philosophy is based on the principles of multiple use and sustained yield of the nation's resources within a framework of environmental responsibility and scientific technology. BLM funding is allocated by the U.S. Congress and is beyond the scope of this document. The word "prevent" as used in Objective 2 for Special Status Species conveys BLM's objective to not allow loss of habitat for special status species where avoidable. The management actions presented in the same table specify how this objective will be achieved. Partnerships are a common tool used by BLM to reach out to its stakeholders, leverage resources, and more effectively and efficiently get work done to meet goals and objectives of the IFNM. Because of the numerous entities that have an interest in the management of the IFNM, and based on current partnerships already in effect, BLM anticipates no shortage in partnering opportunities for projects on the IFNM.

24(817)
Comment: Thank you for attending the Pima Natural Resource Conservation District's board meeting of Tuesday May 22, 2007.
As we discussed, the Pima NRCD holds the viewpoint that the Draft Resource Management Plan and Environmental Impact Statement for the Ironwood Forest National Monument is not based on the best available information, in part because the BLM has not engaged the Pima NRCD's involvement during the planning process.
Response: If any groups or individuals have information that they believe would benefit the decision-making process, BLM would ask those individuals to provide such information. Pima NRCD is encouraged to provide any such information to the BLM to improve planning and decision-making processes. BLM looks forward to working closely with Pima NRCD to improve resource conditions on IFNM.

24(819)
Comment: The BLM analysis of soils, air quality and water is not based on the best available information because the BLM failed to observe the Soil and Water Conservation Act of 1977 and various sections of FLPMA that require the BLM, to the" fullest extent practicable," to cooperate with the Natural Resources Conservation Service and local conservation districts.
Response: The BLM held several collaborative planning meetings to encourage active community and agency involvement in the planning process. The meeting held on June 16, 2004, was held specifically for soil, water, air, geology, and mineral resources in the IFNM. BLM also invited a broad range of Federal, State, tribal, and local agencies, including the NRCS and the ASLD (under which natural resource conservation districts are organized), to become cooperating agencies on the development of the RMP.

24(820)
Comment: While we concur with many of the decisions within the document that have been cooperatively developed by our staff to ensure the Department's abilities to manage wildlife are not negatively impacted, the Department cannot fully support the preferred Alternative C as currently defined in the draft RMP/EIS. Several proposed decisions require either clarification and/or modification to: a) resolve the Department's remaining overarching and specific issues and concerns as outlined below, b) ensure consistency with the National Environmental Policy Act (NEPA) by providing affected agencies and the public with a clear and comprehensive document, and c) ensure consistency with decisions made statewide on other BLM RMPs on National Monuments. Resolution of these issues will contribute to consistent and successful management of fish and wildlife populations and their habitats for the continued enjoyment of future generations.

Response: AGFD's specific concerns are addressed throughout Section 4.3.5.4 and changes to the Draft RMP/EIS have been make where appropriate and agreed upon by BLM and AGFD. The Proposed RMP/EIS for the IFNM represents a good-faith effort by the BLM to provide a clear, comprehensive, draft of a land use planning document; AGFD's specific suggestions for increased clarity have been considered and incorporated. BLM has also attempted to propose management of the IFNM consistent with other BLM national monuments in Arizona, where appropriate. BLM national monuments occur across a broad spectrum of habitats and social uses. While consistency among RMPs across the state is possible in some ways, certain aspects of the IFNM are unique and require specific goals and objectives that may not be necessary or required elsewhere.

24(821)

Comment: The Department understands the challenge of creating a succinct RMP that must meet objectives to manage for multiple resources and uses within the field office planning area over a 20 year period. The complex nature of managing multiple resources in concert can create perceived or real conflicts between Desired Future Conditions or management prescriptions for different uses, resources, or user groups. The Department is concerned several resources and/or uses may inherently conflict, and the proactive and timely management of fish and wildlife could suffer as a consequence. Without more specific national or statewide guidance, wildlife resources may be prioritized, considered, or evaluated at a lower level than those with clear national directives (e.g., guidelines for wilderness management, visual resource management, etc.).

The Department and the BLM Arizona State Office have initiated a revision of the master statewide Memorandum of Understanding (MOU) to address these concerns. This MOU, when finalized, will provide additional context to better enable our respective agencies to resolve potential conflicts arising from RMP decisions that affect wildlife resources and wildlife-based recreation, and to interpret and apply decisions in a consistent manner statewide. The MOU revision has not yet been finalized. Therefore, to address our concerns in the interim and to ensure consistency in management, we request language be added to the RMP that reinforces our mutual commitment to cooperate and collaborate in the proactive management of fish and wildlife and their habitats, for all management prescriptions, designations, and allocations. We suggest this language should read:

"Activities conducted by the Arizona Game and Fish Department to meet Trust Responsibilities to manage wildlife are recognized by BLM as consistent with decisions proposed in this RMP. The Arizona Game and Fish Department's ability to manage wildlife on lands administered by BLM in Arizona will not be diminished or precluded during the life of the plan, based solely on singular or overlapping allocations, designations, and/or management prescriptions (such as those to manage for wilderness characteristics, visual resources, or primitive recreation). All implementation level plans and site-specific projects will continue to be evaluated through appropriate partnerships and through federal and state regulations. This RMP will reflect and support the spirit and intent of the statewide Memorandum of Understanding between BLM and the Arizona Game and Fish Department."

A document of this size and complexity has the potential to negatively impact public participation during development of the RMP. We believe most constituents will find it difficult to thoroughly review and provide comments within the time allotted.

Response: The master Memorandum of Understanding between Arizona BLM and AGFD (Agreement AZ-930-0703) was finalized in August 2007, and BLM looks forward to working with AGFD under and in accord with this agreement. The suggested language has been included, as modified below, in Section 1.6.1 of the Proposed RMP/EIS: "Activities conducted by AGFD to meet Trust Responsibilities to manage wildlife are recognized by BLM as consistent with decisions proposed in this RMP. AGFD's ability to manage wildlife on lands administered by BLM in Arizona will not be diminished. All implementation level plans and site-specific projects will continue to be evaluated through appropriate partnerships and through federal and state regulations."

24(822)
Comment: The Department is also specifically concerned with the lack of detail and clarity regarding the proposed designated route system, and suggests BLM further clarify which routes will be open, closed, or limited. The draft RMP map scale does not provide the level of detail necessary for careful interpretation of route designation decisions. Furthermore, route numbers are not clearly posted within the document and corresponding reference appendices are time consuming to interpret and not easy to digest or understand. Additional maps provided for review on BLM's website are not easily downloaded and do not provide adequate detail. The Department is also concerned with the lack of coordination between TFO and our staff during the development of route alternatives and the selection of the preferred alternative. The Department was integrally involved in route designation processes for other National Monument planning efforts (Sonoran Desert, Agua Fria, AZ Strip, etc.), and was not afforded this opportunity for the IFNM. The Department suggests BLM clarify route designation decisions within the document to provide the public a reasonable opportunity to review proposed route decisions, and further coordinate with the Department to meet both the intent of NEPA and our Cooperating Agency MOU.
Response: AGFD input and information was used to develop the route designations in the proposed alternative. In 2003, BLM provided route inventory data to AGFD and asked for feedback related to sportsman's access needs, access for wildlife management, and other administrative access needed by AGFD to fulfill its mission. AGFD provided BLM this feedback, and it was used to develop the route designation alternatives. BLM also held a community workshop on IFNM travel management at the Pima County Parks and Recreation facility on July 21, 2004. BLM will continue to coordinate with AGFD with regard to route designations and other topics of interest.

24(823)
Comment: The Department firmly supports continued recreational use of the area. The IFNM lies adjacent to the fast growing Tucson metropolitan area surrounded by National Parks and Forests, a National Conservation Area, a National Wildlife Refuge, a large Indian Reservation, and large blocks of State Trust and private lands where public recreational uses are prevented or restricted. The IFNM is one of the few remaining large blocks of public land in the Tucson area that supports a wide range of outdoor recreational activities. The Department believes that if managed properly, outdoor recreational activities can be consistent with the Monument Proclamation, and encourages BLM to support and promote these outdoor recreational activities within the IFNM including: dispersed recreational shooting (see attached Resolution), dispersed and group camping opportunities, and collection of firewood (see page-specific comments).
Response: BLM understands that the continued urban growth of the Tucson and Marana metropolitan areas will continue to increase the public's demand for many types of recreational activities. BLM believes that Alternative C accommodates many forms of recreational activity and realizes that these pressures demand increased consideration of management for the protection of monument resources and values. This alternative is consistent with the monument designation to protect objects of scientific interest and meets the BLM mandate for multiple use. BLM has considered continued recreational shooting under Alternative A, as well as dispersed camping opportunities and collection of firewood under Alternative D.

24(824)
Comment: The Arizona Game and Fish Commission opposes recreational shooting restrictions on any public land in Arizona. BLM should refer to the findings of the Final Report, Tucson Basin Shooting on Public Lands Workshop Project, issued June 2006, by the U.S. Institute for Environmental Conflict Resolution to develop an alternative proposed action. BLM should also define dispersed recreational shooting as "any shooting that is carried out in a safe manner, does not cause resource damage, and does not result in litter" and requests this definition be included in the final RMP. BLM should also develop a law enforcement coordination plan for the IFNM in partnership with local and State law enforcement agencies.

Response: In May, 2002, the BLM Tucson Field Office, in conjunction with the U.S. Institute for Environmental Conflict Resolution, began discussing opportunities for resolving shooting issues that could be included in the planning process for the RMP for the BLM's IFNM. Attendees at the meetings included stakeholders from Federal, State, tribal, and local land management agencies, representatives of the shooting community, other recreationists, local residents, law enforcement representatives, congressional and State representatives, representatives of the environmental community, other recreational users, and other people who shared an interest in this issue. In January 2004, after reviewing the findings of the assessment, several of the key land management agencies (the BLM, the U.S. Forest Service, and AGFD) sponsored a series of working group and public meetings to define a common vision for resolving issues related to shooting on public lands in the Tucson Basin. Final recommendations from the project primarily focused on the increased understanding that was shared by participants regarding the complexity of the issue and the various viewpoints involved. The group did not come to agreement on any substantive decisions regarding shooting within the IFNM or elsewhere in the Tucson area, and did not provide any specific recommendations or criteria by which to evaluate areas for their suitability as shooting areas. In fact, the project report explicitly states that the group was unable to come to agreement on these points when they were discussed.

Going beyond the work that was done by the Tucson Basin Shooting on Public Lands Workshop Project, BLM evaluated whether recreational shooting could be allowed within the monument and still be consistent with the objectives of the Presidential Proclamation to protect the monument's objects. BLM completed an analysis of locations within IFNM that may be suitable as a designated shooting area (for further details see Appendix I). BLM assessed the environmental effects of establishing designated areas for recreational shooting as a component of Alternative D, but concluded that recreational shooting in a designated area would result in significant environmental effects. Opportunities for recreational target shooting continue to be available on BLM lands outside the monument, except where restricted through site-specific management actions. Several shooting ranges in the local area also provide opportunities for this activity, as well as public lands administered by other agencies, such as the U.S. Forest Service.

BLM has not defined recreational target shooting as suggested, primarily because target shooting, even when carried out in a safe and legal manner, can have damaging effects on resources, as is the case with many other legal and legitimate uses of public lands.

24(825)

Comment: SBM reiterates some comments provided earlier in the RMP process in addition to identifying aspects of each alternative that could prove problematic to our current operations or to our private land position. SBM notes that some of the Administrative Actions proposed in Appendix D appear to overstep the authorizations afforded to the BLM under the Categorical Exclusions allowed under Section 1508.4 and therefore should receive full public review.

SBM is concerned that the alternatives do not adequately discuss valid existing rights in regards to valid mining claims and that there appears to be a very apparent bias throughout the document against recognizing those rights. None of the alternatives (B, C, D) recognize that mining is permissible pursuant to valid existing rights. This is very disturbing since the monument proclamation specifically states that establishment of the monument is subject to "valid existing rights." BLM should explicitly acknowledge valid existing rights in all aspects of the proposed alternatives.

Response: BLM recognizes that the establishment of the IFNM is subject to valid existing rights and that these rights would apply under all alternatives. This is addressed in the Draft RMP/EIS in Section 2.3 (Management Common to all Alternatives). It is not necessary to restate this for every goal, objective, and decision within the document, because it qualifies as management common to all alternatives under the provisions of the Proclamation. The Presidential Proclamation 7320 recognizes all valid rights in existence at the time of the monument designation (June 9, 2000). The Proclamation did not revoke any existing withdrawal, reservation, or appropriation of public lands or interests in lands.

24(836)
Comment: The appearance that BLM has ignored these laws and regulations is evident in the omission of a vast resource of knowledge and expertise available from the NRCS and Pima NRCD. The District had a MOU done in 1992 with the Safford BLM Field Office. It is unfortunate that this was not passed to the Tucson Field Office when it was created. We are in the process of updating the MOU. Therefore we recommend the BLM partner with NRCS and the Pima NRCD from this point forward in all decisions related to livestock grazing and rangeland management for the IFNM.
Response: Collaboration on livestock grazing and rangeland management for the IFNM is welcomed and encouraged by BLM. BLM is a signatory to the Memorandum of Understanding (MOU) for Coordinated Resource Management with NRCS and the Arizona Association on Conservation Districts, among various other groups.
This MOU provides a mechanism for our agencies to "work together, share resource information, and develop complementary policies, procedures, and methodologies where possible." BLM also has an MOU with the Pima NRCD that facilitates coordination of "resource planning, management, and educational activities." Completion of the RMP will present numerous opportunities for BLM to coordinate with NRCS, Pima NRCD, and other agencies and individuals on range and grazing management activities at an on-the-ground level, such as the development of allotment management plans, allotment inspections, and standards and guides evaluations. BLM looks forward to working with NRCS and Pima NRCD on these projects.

24(SR15)
Summary Comment: Commenters suggest that the requests for public input are a ruse. They believe that the BLM has ignored public comment and developed the RMP for IFNM in a predecisional manner.
Summary Response: The BLM has made extensive efforts during the RMP process to solicit comments and consider public concerns. BLM considers all comments it receives and provides a response for each; none are ignored. The range of alternatives presented in the RMP is a result of this public outreach. Furthermore, throughout the planning process, many facets of the plan have changed as a result of public concerns, new information provided, or because of comments received from various groups, agencies, and individuals. The proposed version of the RMP contains many corrections, additions, or other changes that stem directly from the comments BLM received on the Draft RMP.

24(SR16)
Summary Comment: In choosing Alternative C as its preferred management plan, the BLM is responding to pressure from political, anti-gun, and environmental special interest groups.
Summary Response: The BLM considered the comments of all concerned public entities, including affected and cooperating agencies, in developing the RMP/EIS. BLM reviews questions, comments, and issues of concern and incorporates these concerns into the environmental analysis where relevant, and does not give arbitrary preference to the positions or interests of any entity or individual. The BLM is responsible for the content of the Proposed RMP/Final EIS, which is subject to final approval by the BLM's Arizona State Director.

24(SR75)
Summary Comment: There is inadequate time to review and provide comments on such a complex and lengthy document. Grant an extension to the review period of the Draft RMP/EIS.
Summary Response: The Draft RMP/EIS was available for public comment for 90 days. BLM considers 90 days sufficient time to analyze and comment on an RMP, and in an effort to move forward with the NEPA process in a timely manner, BLM elected not to extend the comment period. The public can comment at any time, and BLM can consider substantive comments even after the end of a comment period. While BLM may not be able to respond to these comments in the Proposed RMP/EIS document or analyze them with the rest of the comments received during the comment period, BLM will not ignore important and valuable input.

24(SR83)
Summary Comment: The opinion piece Mr. Madigan wrote in a local newspaper was unethical and predecisional because he wrote that recreational shooting should specifically be banned. Mr. Madigan is part of the decision-making process. It is not right that his personal opinion should influence the BLM's choices for the IFNM.
Summary Response: The guest opinion article written by then Field Manager Patrick Madigan and published in the Arizona Daily Star was intended to clarify the reasons why a restriction on target shooting was being considered in the Draft RMP. The guest opinion was seen as an effective communication tool to use to reach a broad audience, in light of the many questions BLM was receiving with regard to the proposed shooting restriction. The article discusses the proposed shooting ban and calls it an "appropriate management choice," indicating that it was part of the preferred alternative in the Draft RMP. The article was in no way predecisional, as it merely reiterated a proposal already put forward by BLM. BLM supported this guest opinion as part of the public involvement and outreach process.

24(SR84)
Summary Comment: We are concerned about the developments regarding the Friends of the Ironwood Forest, an outside group established with BLM funding by BLM managers, but with a selective mailing list. We are concerned that the same organization is now lobbying to influence the final plan. By organizing and partially funding the Friends of the Ironwood Monument in 2006 without publishing the meeting notices in the Federal Register, by failing to send the initial letter of invitation to all parties who had participated in the IFNM planning process, by involving BLM management and BLM financial resources at taxpayer expense, the BLM may be in violation of both FLPMA and the Federal Advisory Committee Act.
Summary Response: This organization was not founded by BLM and was not established with BLM funds. The Friends of the Ironwood Forest is governed by its own bylaws in cooperation with agencies of the U.S. Government and State of Arizona. The organization is not funded by BLM nor is membership restricted to any specific group of people.

24(SR494)
Summary Comment: Public meetings should have been held in more areas so more public comment could have been made.
Summary Response: Six public meetings on the Draft RMP/EIS were held in those communities determined to be most affected by the management of the IFNM, and were generally in close proximity to the monument. Meeting locations were also determined based on attendance during scoping meetings for the RMP. The meetings were held in Tucson, Sells, Sahuarita, and Chandler. Public comments also were encouraged in the form of letters, e-mails, and faxes. More than 12,000 comments from around the nation were received in this manner. BLM made a good-faith effort to involve as many interested public in the review process as possible.

24(SR811)
Summary Comment: BLM did not allow public comment on the Draft RMP/EIS.
Summary Response: Public comment in the form of comment cards, letters, faxes, e-mails and transcripts was taken during the public comment period for the Draft RMP/EIS. BLM designed the majority of public meetings held for the Draft RMP in an open-house format, so that the public could interact with BLM managers and resource specialists in a more meaningful and deliberative way than public hearing formats often provide. Recognizing that many individuals came to meetings with the expectation of providing oral comments in front of a large group, and in response to comments received on this issue, BLM scheduled an additional public meeting where the public hearing format was accommodated. All the oral public comments by speakers were recorded at this meeting.

24(SR826)
Summary Comment: The BLM has effectively ignored important information and public input in developing the alternatives of the Draft RMP/EIS. The BLM should revise the preferred alternative to incorporate more of the public collaboration the agency itself initiated and requested prior to the plan development.
Summary Response: The ideas, input, and information garnered through the public meetings and workshops were used to develop the RMP and specifically to craft the alternatives. The majority of the goals and objectives agreed upon by the working groups have been preserved in the RMP however, based on BLM policy and guidance related to specific BLM programs, some goals and objectives were modified, removed, or merely reworded. Some decisions determined to be beyond the scope of BLM's delegated authority were omitted from the RMP. Other decisions were later identified as administrative actions and were moved to Appendix D. Still others were determined to be inconsistent with specific BLM policy or program guidance and were modified or removed. Through all of the work that was done between the working group sessions and the publication of the Draft RMP, BLM strived to preserve the intent of each element that was changed, where possible. This includes the information that was considered with regard to the proposed route designations and lands managed to protect wilderness characteristics. To keep the public informed of the ongoing development of the alternatives, BLM released a preliminary version of the alternatives in August 2005 and solicited feedback at that time.

24(SR828)
Summary Comment: The Pima NRCD was not among the agencies invited to participate as a cooperating agency, nor was it added to the BLM's mailing list until the current Draft RMP/EIS was already 60 or more days into the public comment period. BLM did not follow the laws requiring coordination with federal, state and local agencies.
Summary Response: BLM has followed all laws requiring coordination with Federal, State, and local agencies in the development of the RMP. BLM invited a broad range of Federal, State, tribal, and local agencies, including the NRCS and ASLD (under which natural resource conservation districts are organized), to become cooperating agencies on the development of the RMP. Because they are not defined as a political subdivision of the State of Arizona, the Pima NRCD does not qualify for cooperating agency status. However, the BLM invites collaboration from natural resource conservation districts affected by the RMP. BLM apologizes for its oversight in omitting the Pima NRCD from the RMP mailing list. Pima NRCD has been added, and BLM looks forward to working with this group in implementing the RMP.

24(SR832)
Summary Comment: BLM did not use professional range management personnel during the development of the Draft RMP/EIS. BLM should coordinate with NRCS and ASLD to finalize any decisions that may affect livestock grazing within the IFNM.
Summary Response: BLM uses an interdisciplinary approach to the planning and NEPA process and employs an interdisciplinary team to develop and review the many interrelated resource components of the RMP. This team is composed of resource professionals with varying educational and professional degrees, along with many years of experience working in the disciplines covered in the RMP, including range management. Where the interdisciplinary team lacked expertise, BLM provided assistance from other levels of the organization. In all cases, proposed actions or activities in the RMP must be, at a minimum, consistent with U.S. Department of the Interior and the BLM regulations, manuals, handbooks, and policies. Grazing systems and changes to allotments are implementation-level planning, and BLM welcomes the assistance of others when evaluating allotments.

24(SR833)
Summary Comment: BLM did not work with the NRCS, ASLD, and Pima NRCD in formulating the alternatives or describing the affected environment.
Summary Response: The BLM held several collaborative planning meetings to encourage active community involvement in the planning process. The meeting held on June 16, 2004, was held specifically for soil, water, air, geology, and mineral resources in the IFNM, and was one of the meetings attended by a representative of NRCS. BLM invited a broad range of Federal, State, tribal, and local agencies, including the NRCS and the ASLD to become cooperating agencies on the development of the RMP. BLM met individually on several occasions with ASLD. Refer also to comment and response 24(828) for additional information regarding the development of alternatives.

24(SR837)
Summary Comment: The spatial data files (geographic information system) used to produce all the maps in the document should be available online.
Summary Response: Geographic information system data relating to the RMP will be posted on the BLM Arizona website.