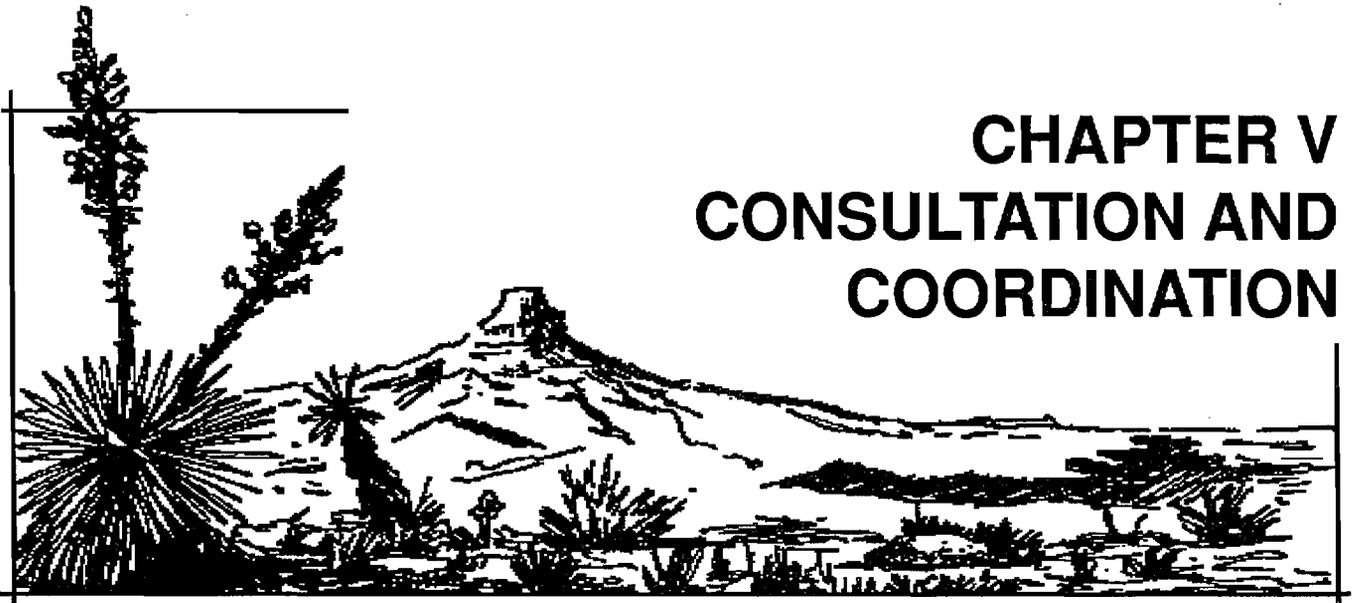


# CHAPTER V CONSULTATION AND COORDINATION



## INTRODUCTION

Resource specialists in the Kingman Resource Area prepared the Kingman Resource Management Plan/Environmental Impact Statement. The Phoenix District Office and the Arizona State Office resource specialists provided technical and policy reviews and suggestions. Preparation of this Resource Management Plan/Environmental Impact Statement began in September 1988.

## SCOPING (Issue Identification)

Scoping identified the significant issues to be analyzed in the Resource Management Plan/Environmental Impact Statement and de-emphasized or eliminated from detailed study insignificant issues or issues addressed in earlier environmental reviews.

The Kingman Resource Area held public scoping meetings to help determine public concerns about issues. Using professional judgment, BLM resource specialists also identified issues. As part of the scoping process, resource managers and an interdisciplinary team reviewed all issues.

The scoping process for the Resource Management Plan/Environmental Impact Statement area involved several phases, extending from September 1988 to June 1990.

The significant environmental issues were incorporated into a range of alternatives, and the effects of implementing the alternatives were analyzed in this draft Resource Management Plan/Environmental Impact Statement.

## PUBLIC INVOLVEMENT AND CONSULTATION DURING DEVELOPMENT OF THE DRAFT RESOURCE MANAGEMENT PLAN/ ENVIRONMENTAL IMPACT STATEMENT

From the start this Resource Management Plan/Environmental Impact Statement has had an active public participation program. The following section lists the public meetings, Resource Management Plan updates issued and Resource Management Plan team member/BLM management meetings with individuals and groups.

### September 1988

The Notice of Intent to prepare a Resource Management Plan/Environmental Impact Statement for the Kingman Resource Area was published in the Federal Register on September 27, 1988.

### October 1988

Letters were sent October 24, 1988 to people on the Kingman Resource Area mailing list informing them that the Kingman Resource Area was starting the Resource Management Plan/Environmental Impact Statement and asking if they wished to be on a mailing list for the planning effort. The letter identified the time and location of the first public scoping meetings to be held in November 1988.

### November 1988

On November 2, 1988, a presentation was given at a Phoenix District Advisory Council meeting outlining the planning process and asking for participation in developing planning issues.

On November 3, 1988, a presentation was given at a Kingman Resource Area Grazing Advisory Board meeting outlining the planning process and asking for their participation in developing planning issues.

In November 1988, public meetings were held in Bullhead City, Kingman, Dolan Springs, Lake Havasu City, Wikieup, Phoenix and Bagdad. A slide program was shown to orient the public to the Kingman Resource Area resources, management concerns and planning issues. The public was invited to participate in the planning process.

### December 1988

On December 1, a meeting was held with 21 members of the Mohave Lions Club of Kingman to discuss the planning process, preliminary planning issues and management concerns. Lions Club participation was requested in developing planning issues.

On December 22, 1988, a meeting was held with the Kingman City Council to discuss planning issues and to request the Council's participation in developing planning issues.

## CHAPTER V

### January 1989

Kingman Resource Area representatives attended the Bullhead City Council meeting on January 3, 1989 to request the Council's involvement in developing planning issues.

### February 1989

From February 6 through 14, 1989, the Kingman Resource Area representatives visited with the Colorado River, Fort Mohave, Yavapai-Prescott and Hualapai Indian tribes to discuss the planning process and invite them to participate in a February 17 meeting.

On February 17, 1989, 40 people attended a workshop to discuss issues and concerns and provide the BLM with ideas and information to include in the Resource Management Plan. Attendees represented agencies, interest groups and clubs who use the public lands. All information generated by four work groups was compiled and distributed to the 100 individuals and groups invited to the meeting.

In February 1989, the first issue of the *Kingman Resource Management Plan Update* was sent to more than 600 interested individuals and groups. The update explained the planning process, outlined preliminary planning issues and management concerns and asked for public involvement in developing issues.

### March 1989

On March 7, 1989, a presentation at the Kingman Resource Area Grazing Advisory Board meeting discussed progress in developing the Resource Management Plan.

### April 1989

In April 1989, the second issue of the *Kingman Resource Management Plan Update* was used to provide the public with the list of approved planning issues and management concerns and the planning criteria to guide the development of the Kingman Resource Management Plan.

### May 1989

On May 15, 1989, BLM representatives met with park rangers from the four affected districts of the Lake Mead National Recreation Area, which borders the Kingman Resource Area, to discuss mutual concerns, including off-highway vehicle use.

On June 18, 1989, progress toward completing the draft Resource Management Plan was discussed at the Phoenix District Advisory Council Meeting.

### October 1989

On October 1989, the third issue of the *Kingman Resource Management Plan Update* explained important information in the Management Situation Analysis, discussed possible alternative plans and introduced several proposed areas of critical environmental concern.

### November-December 1989

A series of public workshops was held from November 27 through December 1, 1989 where interested public land users met to discuss proposed actions affecting cultural resources, recreation, wildlife, mineral development, riparian management, off-highway vehicle use, land tenure and special area designations. One night meeting was held for those who could not make the daytime sessions. The meetings were well publicized by radio, television and newspaper.

On November 9, 1989, progress toward completing the draft Resource Management Plan was a topic of discussion at the Kingman Resource Area Advisory Board meeting.

On December 7, 1989, the Phoenix District Advisory Council toured several key areas representing the diversity of resource issues facing BLM land managers.

On December 12, 1989, BLM realty specialists met with users of BLM communication sites to discuss present and future communication site needs.

On December 18, 1989, BLM representatives met with Arizona State Land Department representatives to discuss disposal areas and issues that would affect future land exchanges.

### January 1990

On January 12, 1990, a meeting with the President of the International Society for the Protection of Mustangs and Burros discussed issues affecting the Kingman Resource Area's future management of horses and burros.

### February 1990

On February 8, 1990, Kingman Resource Area representatives met with Arizona Game and Fish Department managers to discuss areas of critical environmental concern and wildlife management issues. Again on February 22, 1990, important wildlife issues were discussed at the annual coordination meeting between the BLM and the Arizona Game and Fish Department.

### March 1990

On March 8, 1990, Kingman Resource Area representatives met with the citizens of Meadview, Arizona to discuss areas of critical environmental concern and recreation planning in the Resource Management Plan.

On March 13, 1990, important items included in the alternatives of the draft Resource Management Plan were discussed at the Kingman Resource Area Grazing Advisory Board meeting.

On March 28, 1990, there was a meeting with representatives from the Corps of Engineers to discuss issues relating to Alamo Lake.

On March 28, 1990, BLM Arizona recreation specialists met to discuss recreation plans.

On March 30, 1990, important items included in the alternatives of the draft Resource Management Plan were discussed at the Phoenix District Advisory Council meeting.

### November 1990

On November 15, 1990, important items included in the alternatives of the draft Resource Management Plan were discussed at the Kingman Resource Area Grazing Advisory Board meeting.



**PUBLIC INVOLVEMENT AND CONSULTATION DURING DEVELOPMENT OF THE PROPOSED PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT**

**November 1990 through March 1991**

Presentations were made to the following organizations and requests were made for their review of the draft Resource Management Plan. Comments were solicited to assist in the development of the proposed Plan and final Environmental Impact Statement.

- November 1, 1990 - Bullhead City Planning and Zoning Department
- November 6, 1990 - Kingman Community Development Staff
- November 7, 1990 - Hualapai Indian Tribe
- November 14, 1990 - Colorado River Indian Tribe
- November 14, 1990 - Fort Mojave Indian Tribe
- November 20, 1990 - Yavapai - Prescott Indian Tribe
- January 30, 1991 - Arizona State Land Department
- January 30, 1991 - Arizona Cattle Growers Association
- January 31, 1991 - Mohave County Parks Department
- February 5, 1991 - Mohave County Parks Department
- March 1, 1991 - Mohave County Planning and Zoning Department

Public hearings were held in Phoenix on January 15, 1991 and in Kingman on January 17, 1991. The public was encouraged to attend and comment on the draft Resource Management Plan, either verbally or in writing. A court recorder prepared a transcript of the hearing.

Public meetings were held in Bullhead City on January 22, 1991, in Bagdad on January 23, 1991, in Dolan Springs on January 24, 1991 and in Golden Valley on January 30, 1991. The public was encouraged to attend and comment on the draft Resource Management Plan, especially in writing. The Cyprus Bagdad Copper Corporation furnished a court recorder to prepare a transcript of the meeting.

The Kingman Resource Area Grazing Advisory Board requested a meeting specifically to allow permittees grazing livestock on the public land an opportunity to comment on the draft Resource Management Plan. The meeting was held on March 5, 1991. The BLM furnished a court recorder to prepare a transcript of the meeting.

On March 6, 1991, a meeting was held with the Cyprus Bagdad Copper Corporation and the Byner Cattle Company. Company representatives commented on a number of proposed decisions in the draft Resource Management Plan which were of concern to them.

On March 14, 1991, a meeting was held with the Lake Mead National Recreation Area. A Park Service representative discussed subjects requiring cooperation with the BLM and offered comments for the proposed Plan and final Environmental Impact Statement.

On March 20, 1991, a meeting was held with members of the Mohave Livestock Association. A variety of topics covered in the draft Resource Management Plan was discussed and comments were given to the BLM.

On March 20, 1991, a meeting was held with a number of individuals representing mining interests in Mohave County. Proposed decisions in the draft Resource Management Plan affecting mining operations were discussed and comments were given to the BLM.

On March 27, 1991, a meeting was held with the Cyprus Bagdad Copper Corporation and Byner Cattle Company to discuss changes in the draft Resource Management Plan. Additional comments were given to the BLM.

**May-June 1991**

On May 9, 1991, a meeting was held with representatives from the Arizona Department of Environmental Quality. Water quality issues were discussed and a further meeting was scheduled to prepare changes requested by the Environmental Protection Agency.

On June 6, 1991, a meeting was held with the Cyprus Bagdad Copper Corporation and Byner Cattle Company. Changes in the draft Resource Management Plan were discussed.

On June 11, 1991, a meeting of the Phoenix District Advisory Council was held to discuss proposed changes in the draft Resource Management Plan, to be included in the proposed Plan and final Environmental Impact Statement.

On June 18, 1991, a meeting of the Phoenix District Advisory Council was held to discuss proposed changes in the draft Resource Management Plan, to be included in the proposed Plan and final Environmental Impact Statement.

On June 18, 1991, a meeting was held at which areas of concern were discussed. Representatives of the Arizona Department of Environmental Quality were committed to help prepare important sections for the proposed Plan and final Environmental Impact Statement. The BLM received information which would help the federal land manager comply with state water quality standards.

**July-November 1991**

On July 19 and August 22, 1991, meetings were held with the Mohave Livestock Association to discuss proposed changes in the draft Resource Management Plan to be included in the proposed Plan and final Environmental Impact Statement.

On September 5 and 6, 1991 during a field tour and meeting, the Phoenix District Advisory Council discussed proposed changes to the draft Resource Management Plan.

On November 19, 1991, information was discussed with the Kingman Resource Area Grazing Advisory Board to be included in the proposed Resource Management Plan and final Environmental Impact Statement.

## CHAPTER V

### LIST OF PREPARERS

#### **Bruce Asbjorn, Outdoor Recreation Planner**

B.S. in Range/Forest Management, Colorado State University. Member of the core team and prepared the rangeland management, vegetative products, soils and watershed and special status species (plants) sections. Has worked 14 years with the BLM.

#### **Joyce Bailey, Realty Specialist**

Joyce has 19 years of service with the BLM in Arizona, the last four years in Realty. She is a member of the core team and prepared the lands and realty sections of the final document.

#### **Josey Behl, Geographic Information System Coordinator**

Has 14 years federal service, nine years with the BLM. In May 1990, Josey became Geographic Information System Coordinator. She digitized resource information and produced maps and graphics for the Resource Management Plan/Environmental Impact Statement.

#### **R. Gordon Bentley, Team Leader**

B.S. in Forest Management, Northern Arizona University, M.S. in Range Management, University of Arizona. Gordon has 29 years experience as a resource specialist and manager with the BLM. He assisted in preparing the special management areas, wildlife, minerals and recreation sections and acted as writer-editor for the document.

#### **Bill Carter, Hazardous Material Coordinator**

B.S. in Agronomy, Kansas State University. Bill wrote Chapters 1 and 5 and assisted in preparing the Resource Management Plan/Environmental Impact Statement. He has worked 26 years for the BLM.

#### **Rick Colvin, Outdoor Recreation Planner**

B.S. in Resource Recreation Management, M.A. in Interdisciplinary Studies, Oregon State University. Rick has worked 13 years for the BLM. Member of the core team for final Resource Management Plan/Environmental Impact Statement and prepared recreation, off-highway vehicle, Visual Resources, Wilderness and Wild and Scenic Rivers sections.

#### **Larry Davis, Computer Specialist**

Larry worked 37 years as a visual information specialist and graphics designer, 16 of these with the BLM. He prepared all illustrations.

#### **Grant Drennen, Supervisory Range Conservationist**

B.S. degree in Range Science/Watershed from Utah State University. Grant has 16 years of service with the BLM. Grant provided valuable information about the contents of management framework plans and grazing environmental impact statements and helped to revise the final document.

#### **Floyd Gray, Research Geologist**

M.S. in Geology, University of Massachusetts. Floyd has worked 17 years with the U.S. Geological Survey, Geologic Division, Office of Mineral Resources in Menlo Park, California. He prepared the geology portions of the Management Situation Analysis and Chapter 3 of the Resource Management Plan.

#### **Kelly Grissom, Wild Horse and Burro Specialist**

B.S. in Range Management, Oklahoma State University. Kelly has 15 years with the BLM, 13 of them working with wild burros and horses. Kelly is a member of the core team and prepared the wild horse and burro section.

#### **Bob Hall, Wildlife Biologist**

B.S. in Wildlife Management, minors in Range Management and Natural Resource Conservation from Humboldt State University. Bob is a member of the core team and helped to prepare the wildlife, special status species (animals) and riparian sections of the Resource Management Plan/Environmental Impact Statement. Bob has 15 years with the BLM.

#### **Bob Harrison, Geologist**

Bob compiled the mineral data for geology maps.

#### **Mary Harrison, Geographic Information System Coordinator**

B.S. in Geology, four years private industry, 14 years federal service of which five have been with the BLM. Mary was in charge of digitizing and entering resource information in the Geographic Information System.

#### **Chris Horyza, District LIS/ARD Coordinator**

B.S. in Range Management, Washington State University. Chris has worked 14 years with the BLM. He assisted in map preparation and coordinated work done by the Arizona State Office cartographic staff.

#### **Cathie Jensen, Realty Specialist**

A.S. in Forestry from Southeastern Illinois College and attended the BLM Lands School at the Phoenix Training Center. She prepared the lands and realty sections of the draft document. Cathie has worked 11 years for the BLM.

#### **Mike Kliemann, Outdoor Recreation Planner**

B.S. in Outdoor Education/Recreation Planning, Southern Illinois University. He has worked 12 years for the BLM, three years as a National Park Planner with the Smithsonian Peace Corps Environmental Program and 1-1/2 years with the National Park Service in Carlsbad, New Mexico. Mike was a member of the core team and assisted in preparing the recreation section.

#### **Carol Laver, District Planning and Environmental Coordinator**

B.S. in Range Science from California State University at Chico. M.S. in Renewable Natural Resources, University of Arizona. Carol has six years of service with the BLM. She helped to organize and revise the final document.

#### **H. Kenneth McGinty, Writer-Editor**

B.A. in History, Duke University, M.A. in Geography, Clark University. Ken has 15 years with the BLM and edited the draft document.

#### **Janna R. Paronto, Public Contact**

Janna has four years with the BLM and is a charter member of the core team and served as the primary typist-computer operator for the draft and final.

**Wendell G. Peacock, Writer-Editor**

A.A. in Liberal Arts, Mesa Community College, B.A. in Journalism/Mass Communications, Arizona State University. Wendell has been with the Phoenix District, BLM for seven years.

**Rebecca L. Peck, Wildlife Biologist**

B.S. in Wildlife Management, Humboldt State University, California. She worked a year for the Soil Conservation Service and has worked for the BLM a total of 13 years. She is a member of the core team and assisted in preparing the wildlife, riparian and scenic river sections.

**Diane Russell, Editorial Assistant**

A.A.S. in Computer Information Systems from Mohave Community College. She worked three years at the college, two years with the BLM. Diane assisted with word processing.

**Don Simonis, Archaeologist**

M.A. in Anthropology, Arizona State University. Don is a member of the core team and prepared the cultural section. He has worked 13 years for the BLM.

**John Thompson, Geologist**

B.S. in Engineering Geology from Northern Arizona University. John worked two and one-half years with the Bureau of Reclamation and has worked one and one-half years with the BLM. He is a member of the core team and helped to prepare the minerals section.

**Phoenix District Office Special Assistance**

**Clair Button, Botanist**

B.S. in Natural Resources, University of Michigan. Clair has 15 years with the BLM. He assisted in preparing the special status species (plants) section.

**Lin D. Fehimann, Water Rights Specialist**

B.S. in Secondary Education from University of Maryland. Lin has worked 10 years with the BLM. She assisted in developing the water rights portion.

**Russ Krapf, Soil Scientist**

B.S. in Chemistry from California Western University, M.S. in Agricultural Chemistry and Soils from University of Arizona and Ph.D. in Soil Science from University of Idaho. Russ assisted in developing the soils and watershed portion.

**Barry Long, Hydrologist**

B.S. in Watershed Science from Colorado University and M.S. in Forest Hydrology from Oregon State University. Barry assisted in developing the watershed water quality and water quantity portions.

**Kingman Resource Assistance**

Ken R. Drew, Area Manager  
 Elaine Marquis, Area Manager (March 1989 to June 1991)  
 Jesse Juen, Assistant Area Manager  
 Duane Ferneau, Civil Engineering Technician  
 Don McClure, Resource Statistician

**Phoenix District Office Assistance**

Henri Bisson, District Manager (until November 1992)  
 Gordon L. Cheniae, District Manager  
 Paul Buff, Assistant District Manager, Mineral Resources  
 Bill Childress, Assistant District Manager, Land and Renewable Resources  
 Eugene Dahlem, Wildlife Management Biologist  
 Glenn Joki, Fire Management Officer  
 Jack Ragsdale, Outdoor Recreation Planner

**Arizona State Office Assistance**

Lester K. Rosenkrance, State Director  
 Bruce P. Conrad, Associate State Director  
 Beaumont C. McClure, Deputy State Director, Lands and Renewable Resources  
 Larry P. Bauer, Deputy State Director, Mineral Resources  
 Alan Rabinoff, Chief, Branch of Mining Law Administration  
 Phil Moreland, Chief, Branch of Planning Environment, Lands and Recreation  
 Ted Cordery, Threatened and Endangered Species Specialist  
 Keith L. Pearson, Environmental Coordinator  
 Jerry Coolidge, Planning Coordinator  
 George W. Ramey, Jr., Range Conservationist  
 Gary D. Stumpf, Archaeologist  
 Bruce B. Talbot, Natural Resource Specialist (Hazardous Materials)  
 Marvin E. Weiss, Wild Horse and Burro Specialist  
 Robert E. Archibald, Jr., Reality Specialist  
 Sue E. Richardson, Outdoor Recreation Planner (Wilderness)  
 Jim Renthall, Soil, Water and Air Specialist  
 Terry O'Sullivan, Outdoor Recreation Planner  
 Ron Hooper, Riparian Coordinator

**Agencies, Organizations and Persons Who Receive the Draft and Final Resource Management Plan/Environmental Impact Statement**

Because of the size of the mailing list (more than 700), only a partial list of those who will receive the document follows.

**Federal Agencies**

Advisory Council on Historic Preservation  
 Council on Environmental Quality  
 Department of Agriculture  
     Forest Service  
     Soil Conservation Service  
 Department of Defense  
     Army Corps of Engineers  
     U.S. Air Force  
 Department of Energy  
 Department of the Interior  
     Bureau of Indian Affairs  
     Bureau of Mines  
     Bureau of Reclamation  
     Fish and Wildlife Service  
     Geological Survey  
     Minerals Management Service  
     National Park Service  
 Environmental Protection Agency

## CHAPTER V

### Arizona State Agencies

Arizona Commission of Agriculture and Horticulture  
Arizona Department of Environmental Quality  
Arizona Department of Health Services  
Arizona Department of Library, Archives and Public Records  
Arizona Department of Mines and Mineral Resources  
Arizona Department of Transportation  
Arizona Department of Water Resources  
Arizona Game and Fish Department  
Arizona Geological Survey  
Arizona Office of Economic Planning and Development  
Arizona Oil and Gas Commission  
Arizona Outdoor Recreation Coordinating Commission  
Arizona State Clearinghouse  
Arizona State Historic Preservation Officer  
Arizona State Land Commissioner  
Arizona State Land Department  
Arizona State Mine Inspector  
Arizona State Parks Board  
Arizona Water Resources Department  
Bureau of Geology and Mineral Technology  
Governor's Commission on Arizona Environment  
Mineral Resource Department

### Local Agencies

Bullhead City  
City of Kingman  
Coconino County Board of Supervisors  
Mohave County Board of Supervisors  
Mohave County Parks Department  
Mohave County Planning and Zoning Commission  
Northern Arizona Council of Governments  
Yavapai County Board of Supervisors  
Yavapai County Planning and Zoning Department

### Indian Tribes and Councils

Ak-Chin Indian Community  
Colorado River Indian Tribes  
Fort McDowell Mohave-Apache Community Council  
Gila River Indian Community  
Hualapai Indian Tribe  
Havasupai Tribal Council  
Hopi Tribal Council  
Mohave Tribal Council  
Navajo Tribal Council  
Pascua Yaqui Tribal Council  
Salt River Pima-Maricopa Community Council  
Tohono O'Odham Council  
Truxton Canyon Agency  
Yavapai-Apache Community Council  
Yavapai-Prescott Tribe

### Interest Groups

American Horse Breeders  
American Horse Protection Association  
American Mustang and Burro Association  
Animal Protection Institute  
Arizona Archaeological Society  
Arizona Humane Society  
Arizona State Horsemen Association  
Arizona State Association of Four-Wheel-Drive Clubs, Incorporated  
Arizona Cattle Growers Association  
Arizona Desert Bighorn Sheep Society  
Arizona Desert Racing Association  
Arizona Mining Association  
Arizona Mining and Prospecting Association  
Arizona Mountaineering Club  
Arizona Nature Conservancy  
Arizona Native Plant Society  
Arizona Outdoor Coalition  
Arizona Prospectors and Small Mine Operators Association  
Arizona Public Service  
Arizona Wildlife Federation  
Audubon Society  
Bureau of Land Management Advisory Board  
Cyprus-Bagdad Copper Company  
Defenders of Wildlife  
Desert Donkey and Mule Club  
Desert Tortoise Council  
El Paso Natural Gas Company  
Foundation for North American Wild Sheep  
International Society for the Protection of Mustangs and Burros  
Kingman Grazing Advisory Board  
League of Women Voters  
Maricopa Audubon Society  
National Audubon Society  
National Wildlife Federation  
Natural Resources Defense Council, Incorporated  
New Mexico and Arizona Land and Cattle Company  
News Media  
Oil and Gas Companies  
OHV Clubs  
Phoenix District Advisory Council  
Public Lands Council  
Rockhound Clubs  
Spanish Mustang Association  
Santa Fe Railroad Company  
Sierra Club, Grand Canyon Chapter  
Sierra Club, Plateau Group  
Sierra Club, Southwest Office  
The Nature Conservancy  
United Four-Wheel-Drive Association  
Walapai Four-Wheelers, Incorporated  
Wild Horse Organized Assistance  
Wild Burro Protection Association  
The Wilderness Society  
Union Pacific Resources  
Wildlife Society  
Yavapai Cattle Growers  
Yuma Audubon Society

**Elected Representatives**

**Federal**

Senator Dennis DeConcini  
Senator Karan English  
Senator John McCain  
Representative Sam Coppersmith  
Representative Jim Kolbe  
Representative Jon Kyl  
Representative Bob Stump  
Representative Ed Pastor  
Representative John J. Rhodes III

**State**

Governor Fife Symington  
Senator Janice Kay Brewer  
Senator Carol Springer  
Representative Donald Aldridge  
Representative Ben Benton  
Representative Dave Carson  
Representative Herb Guenther  
Representative Kyle Hindman  
Representative Robert J. McLendon  
Representative John Wettaw



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UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
ECOLOGICAL SERVICES  
3616 W. Thomas, Suite 6  
Phoenix, Arizona 85019

2-21-91-F-089

March 8, 1991

MEMORANDUM

TO: District Manager, Phoenix District Office, Bureau of Land Management, Phoenix, Arizona  
FROM: Acting Field Supervisor  
SUBJECT: Biological Opinion for Kingman Resource Area Resource Management Plan

This responds to your request of December 13, 1990, for formal consultation with the Fish and Wildlife Service (FWS) pursuant to Section 7 of the Endangered Species Act (Act) of 1973, as amended, on the subject Resource Management Plan (RMP) for Bureau of Land Management (BLM) lands in the Kingman Resource Area in Coconino, Mohave and Yavapai Counties, Arizona.

The endangered Hualapai Mexican vole (Microtus mexicanus hualpaiensis), peregrine falcon (Falco peregrinus anatum), bald eagle (Haliaeetus leucocephalus), and Arizona cliffrose (Purshia subintegra) are the listed species of concern within the proposed RMP area. The BLM has also provided an assessment of effects to the desert tortoise (Gopherus agassizii), a species under petition to be listed as endangered or threatened. The 90-day consultation period began on December 14, 1990, the date your request was received in our office.

The following biological opinion is based on information contained in the biological assessment for the RMP dated December 13, 1990 and the draft Environmental Impact Statement (EIS) and RMP description dated November 27, 1990, data in our files and other sources of information.

BIOLOGICAL OPINION

It is my biological opinion that the proposed RMP is not likely to jeopardize the continued existence of the Hualapai Mexican vole, peregrine falcon, bald eagle or Arizona cliffrose. Specific actions implemented under the RMP will require analysis of effects to threatened or endangered species and may require separate formal consultation under the Endangered Species Act.

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BACKGROUND INFORMATION

Species Descriptions

The Hualapai Mexican vole (Hualapai vole) was listed as an endangered species on November 2, 1987. The known range of the subspecies is confined the riparian associated areas of the Hualapai Mountains in Mohave County. Only one population of the Hualapai vole was located in a survey of known and recent historic habitats in the fall of 1990. That population was on private land in Pine Peak Canyon. Brought over the past two to three years may have reduced habitat quality, and thus populations at the other three known locales.

Threats to the Hualapai vole come largely from the destruction of its riparian and historic upland habitats by grazing of livestock and introduced wildlife, recreation use and human developments within the habitat areas. These threats are continuing and some are likely to increase.

The peregrine falcon was listed as endangered on October 3, 1970. This species is widespread in the northern hemisphere with the anatum subspecies found in North America. Populations of the peregrine falcon in Arizona have been increasing in recent years with birds occupying more and more of the suitable habitats available. On the project area, the known eyries are in the northern portions near the Grand Canyon.

Largely a predator on other birds, the peregrine falcon was endangered by pesticide bioaccumulation and loss of breeding habitats due to disturbances. Disturbance of eyrie sites remains a significant threat to the species in Arizona.

The bald eagle was listed as endangered on March 11, 1967. In Arizona, breeding pairs of bald eagles are found along most of the major river and reservoir systems in the state, with exception of the Colorado River below Lake Mead. Wintering bald eagles utilize the same river systems and may also be found around small lakes and ponds. Arizona's breeding bald eagles nest earlier than bald eagles from more northern climates, probably to avoid effects of the intense summer heat on eggs or young eaglets.

Threats to this species include bioaccumulation of pesticides from its diet of fish, loss of nesting areas due to reservoir construction, depletion or alteration of riverine flows, loss of nest trees and human disturbances.

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The Arizona cliffrose was listed as endangered on May 29, 1984. Four isolated populations are known, all located on Tertiary limestone lakebed soils. These white soils are very distinctive and may occur in other areas of Arizona below the Mogollon Rim.

Threats to this species include loss of habitat due to mining operations, overgrazing by livestock, feral burros and wildlife, off-highway vehicle (OHV) use and other human developments such as recreation areas, roads, and powerline and gas line corridors.

#### Project Description

The proposed RMP will guide management directions and programs on the Kingman Resource Area (KRA) for the next 20 years. The RMP is not a stand-alone management document. Grazing management will remain as described under the existing EIS's (Cerberus/Black Mountain and Hualapai-Aquarius) and the wilderness management will be tied to the plan described in the appropriate EIS (Upper Sonoran, Phoenix and Arizona Mohave) as well as final legislation passed by the Congress to designate such areas. The RMP does provide for some integration of the different documents that will guide multiple-use management on the KRA. Portions of previous management documents (Management Framework Plans and others) are incorporated into the RMP as common to all alternatives under examination.

The RMP analyzes three alternatives. Alternative 1 represents the current management emphasis and is the "No Action" alternative. Alternative 2 is the BLM proposed action and emphasizes allowing for multiple use while protecting the environment. Alternative 3 is very similar to Alternative 2, except it has more of an emphasis on recreation, closes more areas to livestock and has more cultural resource protection. Each of the alternatives is very complex and a full exploration of their features is not possible in this opinion. We have therefore appended to this opinion a table from the draft EIS that compares the important points of each (Appendix 1). More complete information on the alternatives is available in the draft EIS.

#### EFFECTS OF THE ACTION

##### Direct and Indirect Effects

Although the BLM has selected a proposed action in its draft EIS, we will briefly examine the other two alternatives as well, in the event that some of the features of those alternatives are incorporated into the final

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proposed action. For clarity, each listed species will be discussed separately. Only the major points of each alternative are mentioned below. For more complete information, please refer to the biological assessment and the draft EIS and RMP.

##### Hualapai Mexican Vole

Alternative 1 would continue present risks to Hualapai vole populations from mineral activities, grazing management, recreation and utility corridors. Under present emphases on riparian and watershed management, some benefits to the Hualapai vole could be realized as physical habitat conditions improve under these programs. No special management emphasis in Hualapai vole habitats would occur beyond what could be accommodated under the existing MFP guidance. This alternative does contain the intent to acquire no-federal lands that currently support Hualapai voles and this would likely benefit the species. However there is a large and significant level of impacts to this species that will continue and increase over time from recreation, grazing and wildlife management decisions.

Alternative 2 would provide for a mineral withdrawal (entry and material disposal) in Hualapai vole habitat areas (2180 acres), development of or revisions to Allotment Management Plans (AMPs) to reduce or eliminate effects of livestock grazing, confining utility corridors to existing rights of way and creating an Area of Critical Environmental Concern (ACEC) on 3000 acres of Hualapai vole habitat. Designation of this ACEC would provide more directed management emphasis, especially in riparian and watershed issues, as well as other identified needs of the species and thus is likely to assist in recovery implementation. The alternative also restricts the use of OHVs from washes, which would protect Hualapai vole habitat. But the intent to construct an organized camping area at Pine Flat is not likely to protect Hualapai vole habitat in that location and the Moss Wash campground may influence development of habitat there. Significant effects to existing and recoverable Hualapai vole habitats from human use, especially recreation, grazing and wildlife management decisions will continue at some level. Because the status of the Hualapai vole is so precarious, the BLM may wish to be especially protective of vole habitats and evaluate all management actions and human use pressures that may have an effect on this species.

The effects of Alternative 3 for Hualapai voles is the same as for Alternative 2.

##### Peregrine Falcon

Alternative 1 would continue potential effects to peregrines from mineral activity, new linear rights of way, grazing, and recreation management. Watershed and riparian programs may improve overall habitat conditions which could improve the prey base. Federal acquisition of land near eyrie

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locations would likely help to protect those sites from some adverse effects of human activity, but actual benefit would depend upon the management of those lands. No special management areas would be designated.

Alternative 2 would provide for both overall habitat enhancement by the proposed ACECs in riparian and watershed areas which would influence minerals, grazing and lands acquisition and management. None of the eyries sites are in these ACECs, but areas may be used by resident as well as wintering peregrines during the year. A proposed recreation development at Antelope Spring may increase the opportunity for human disturbance near that eyrie.

Alternative 3 would differ from Alternative 2 in the reduced level of protection given to riparian and watershed areas under ACEC designations.

#### Bald Eagle

Alternative 1 would continue potential effects due to mineral activity, grazing, recreation and rights of way establishment. Since the bald eagle is associated with the riparian corridors, efforts to improve conditions there under watershed and riparian initiatives may be of benefit, as would acquisition of non-federal lands in bald eagle habitats, again subject to management emphasis.

Alternative 2, with the ACECs for riparian and watershed, would provide opportunity to improve bald eagle habitats in these important areas. Restrictions on minerals, grazing, and recreation, especially OHV use may enable enhancement of these habitats, although new recreation developments, like that at Six Mile Crossing and proposed recreation trails in Burro Creek, may have an adverse impact on breeding sites. Land acquisition and confining rights of way to existing corridors also have potential for beneficial effects.

Alternative 3 would differ from Alternative 2 in the reduced level of protection given to riparian and watershed areas under ACEC designations.

#### Arizona Cliffrose

Alternative 1 would continue the considerable threats to this species from minerals development, grazing, recreation, and rights of way. No special management efforts would be made for Arizona cliffrose habitat.

Alternative 2 would provide protection for Arizona cliffrose habitat by creation of an ACEC with a mineral withdrawal of unclaimed lands. Mineral exploration on claimed lands within the ACEC would be subject to tighter regulations under this alternative. The ACEC designation would also allow greater management of grazing, rights of way and recreation activities in the

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habitat, although the Six Mile Crossing recreation site could increase visitation to the Arizona cliffrose habitat and thus increase the potential for habitat damages.

The effects of Alternative 3 for Arizona cliffrose would be the same as for Alternative 2.

#### Cumulative Effects

Cumulative effects are those effects of private and State funded non-Federally regulated activities that are reasonably certain to occur within the area of the Federal action subject to consultation that may have an effect on the listed threatened or endangered species.

Development of private lands in the KRA would put greater stress on the public lands for recreation, sale of harvestable commodities and minerals and, identification of lands for disposal to the private sector. Management of the public land resource to protect endangered species values from these increased demands would, therefore, become more intensive over the life of the RMP. As specific portions of the RMP are implemented, there would have to be an assessment of the identifiable cumulative effects.

#### CANDIDATE SPECIES

Of the category 1 and 2 candidate species that may be found on the KRA, only one is described in any detail in the biological assessment. The Sonoran population of the desert tortoise, (*Gopherus agassizii*), is a candidate category 2 species under evaluation for listing. Significant steps have been taken within the range of the Sonoran tortoise in Arizona to address the impacts of human activities and provide for management of the species. The RMP alternatives would provide for implementing the management guidelines developed for Arizona and Alternatives 2 and 3 would contain ACECs to protect important Sonoran tortoise habitats.

#### Incidental Take

Section 9 of the Act, as amended, prohibits any taking (harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or attempt to engage in any such conduct) of listed animal species without a special exemption. Harm is further defined to include significant habitat modification or degradation that results in injury to listed species by significantly impairing behavioral patterns such as breeding, feeding or sheltering. Amendments to the Act in 1988 extended protection under Section 9 to plant species on Federal lands in cases of malicious damage or destruction or when removed and reduced to possession. Under the terms of section 7(b)(4) and 7(o)(2), taking that is incidental to, and not intended as part of the agency action is not considered taking within the bound of the Act provided that such

taking is in compliance with the incidental take statement. The measures below are not discretionary and must be undertaken by the agency or made a binding condition of any grant or permit issued to the applicant, as appropriate.

The FWS does not anticipate any incidental take to occur as a result of the administrative action of finalizing the RMP, thus, no incidental take level is set for any of the listed species in the KRA. As specific actions are implemented, they will each have to go through Section 7 consultation and if a formal consultation is required, an incidental take for that action would be set in the biological opinion for that specific action.

Taking that is not incidental, and therefore likely to be in violation of the Act is, and has occurred for the Arizona cliffrose and Hualapai vole. These takings must be resolved by the BLM through appropriate Section 7 consultation and implementation of biological opinions.

#### CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the Act directs Federal agencies to utilize their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. The term conservation recommendations has been defined as suggestions of the FWS regarding discretionary measures to minimize or avoid adverse effects of a proposed action on listed species or critical habitat or regarding the development of information.

Specific conservation recommendations for each of the programs described in the RMP are not contained in this biological opinion. As the RMP programs are implemented, conservation recommendations will be incorporated into the biological opinions developed for those actions as appropriate.

We do have one general conservation recommendation to make on the RMP. The implementation of the RMP will be complex and require careful scheduling to prepare the management plans of the new ACECs, write or revise AMPs and other environmental documents within a timely and effective manner. Many of the RMP actions are designed to protect endangered and threatened species and in order to provide the maximum protection possible, should be implemented as quickly as possible. We recommend that the BLM set up a priority system to identify the most critical endangered species issues and proceed with their resolution as quickly as possible.

#### CONCLUSION

This concludes formal consultation on this action. As required by 50 CFR 402.16, reinitiation of formal consultation is required if: (1) the amount or extent of incidental take is exceeded; (2) new information reveals effects of the agency action that may impact listed species or critical habitat in a manner or to an extent not considered in this opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action.

If we can be of further assistance, please contact Ms. Lesley Fitzpatrick or me (Telephone: 602/379-4720; FTS 216-4720).

  
Gilbert D. Metz

cc: Director, Arizona Game and Fish Department, Phoenix, Arizona  
Regional Director, Fish and Wildlife Service, Albuquerque,  
New Mexico (FWE/HC)  
Director, Fish and Wildlife Service, Washington, DC (HC)

## INDEX OF PUBLIC COMMENT LETTERS

Number	Date Received	Agency, Organization or Individual
1	11-19-90	Bureau of Indian Affairs
2	12-02-90	Joe McGloin
3	12-10-90	Maricopa County Department of Planning and Development
4	12-12-90	Arizona Commission of Agriculture and Horticulture
5	12-14-90	Rudy K. Walter
6	12-20-90	Frances Benigar and Connie Childers
7	12-26-90	Arizona State Parks/State Historic Preservation Officer
8	01-07-90	U.S. Bureau of Mines, Intermountain Field Operations Center
9	01-14-91	Maricopa Audubon Society
10	01-16-91	TranAm Energy Inc.
11	01-17-91	Department of the Air Force
12	01-18-91	Department of Energy, Western Area Power Administration
13	01-25-91	Animal Protection Institute of America
14	01-25-91	Mary McBee
15	01-28-91	Donald L. McBee
16	02-01-91	Arizona Department of Commerce - Arizona State Clearinghouse
17	02-01-91	Arizona State University, Center for Environmental Studies
18	02-11-91	Arizona State Mine Inspector
19	02-14-91	John D. Pettit
20	02-15-91	Carson Water Company
21	02-19-91	Yavapai-Prescott Indian Tribe
22	02-25-91	Arizona State Land Department
23	03-05-91	Arizona Cattle Growers' Association
24	03-11-91	Elliott E. Bernshaw
25	03-11-91	Grapevine Springs Ranch, Inc.
26	03-11-91	The Desert Tortoise Council
27	03-14-91	Lois J. Hubbard, Mohave County Board of Supervisors
28	03-18-91	Arizona Farm Bureau Federation
29	03-19-91	Robert L. Harrison
30	03-19-91	Frank L. Hunt
31	03-19-91	W. J. Robinson
32	03-19-91	Amy A. Kirk
33	03-19-91	John Gallagher
34	03-19-91	Rick Alexander
35	03-20-91	Kathleen Mitchell
36	03-20-91	Peter J. Galvin, Friends of the Owls
37	03-20-91	Douglas Hulmes
38	03-20-91	Ted H. Hyde, GSA Resources, Inc.
39	03-21-91	Arizona Desert Bighorn Sheep Society, Inc.
40	03-21-91	Thomas W. Crosslin
41	03-22-91	Howard Grounds
42	03-25-91	Karen Dismukes
43	03-26-91	William L. Nugent
44	03-26-91	Thomas B. McConnell
45	03-27-91	Charles Earle, Laughlin Land and Cattle Company
46	03-28-91	Dave Knisely
47	03-29-91	Clinton C. Cofer
48	03-29-91	Clinton C. Cofer
49	03-29-91	Sandra J. Cofer
50	03-29-91	Ken McReynolds
51	03-29-91	Ken McReynolds
	03-29-91	Cristi McReynolds

## INDEX OF PUBLIC COMMENT LETTERS

<b>Number</b>	<b>Date Received</b>	<b>Agency, Organization or Individual</b>
53	03-29-91	Mohave Livestock Association
54	04-12-91	Mohave Livestock Association
55	04-01-91	Pacific Turbine Systems
56	04-01-91	National Parks and Conservation Association
57	04-02-91	Prescott Audubon Society
58	04-04-91	Glenn and Jane Franklin
59	04-04-91	Vera M. Walters, Southwestern Field Studies
60	04-05-91	Jean Linn
61	04-08-91	Rebecca Davis
62	04-08-91	National Park Service, Western Region
63	04-09-91	Kingman Chamber of Commerce
64	04-01-91	Sue Baughman
65	04-10-91	Andy Groseta, Headquarters West, Ltd.
66	04-10-91	Liquinox Company
67	04-11-91	Arizona Public Service Company
68	04-11-91	Cyprus Bagdad Copper Corporation
69	04-12-91	Marvin Hunt
70	04-12-91	Frank L. Hunt
71	04-12-91	John L. Neal
72	04-12-91	David B. Wilcoxon
73	04-12-91	Klein S. Bartmus
74	04-12-91	Mohave County Parks Department
75	04-12-91	Georgia McCrory
76	04-12-91	Citizens Utilities Rural Company, Inc., Bruce Mitchell
77	04-12-91	Cyprus Minerals Company, C.C. Bromley
78	04-12-91	Mike Gross and Norma Gross
79	04-12-91	International Society for the Protection of Mustangs and Burros
80	04-12-91	Elno Roundy
81	04-12-91	Elno Roundy
82	04-12-91	Richard L. Leibold, Sierra Club, Ramparts Chapter
83	04-12-91	U.S. Environmental Protection Agency, Region IX
84	04-15-91	Arizona Game and Fish Department, Director Duane L. Shroufe
85	04-15-91	American Rivers
86	04-15-91	The Arizona Nature Conservancy
87	04-15-91	Friends of Arizona Rivers
88	04-15-91	The Wildlife Society, Arizona Chapter
89	04-15-91	Arizona Riparian Council
90	04-15-91	The Arizona Native Plant Society
91	04-15-91	Sierra Club - Grand Canyon Chapter
92	04-15-91	Mohave Sportsman Club
93	04-15-91	Ruth Brimhall
94	04-15-91	Art Rogers
95	04-15-91	Frank Allen Hunt
96	04-15-91	U.S. Fish and Wildlife Service, Ecological Services
97	04-15-91	The Keith Companies - Arizona
98	04-15-91	Signe A. Hurd
99	04-15-91	Joseph M. Feller
100	04-15-91	Robert S. Lynch
101	04-25-91	Santa Fe Pacific Railroad Company
102	04-26-91	Arizona Department of Mines and Mineral Resources
103	04-26-91	Arizona Department of Environmental Quality

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United States Department of the Interior  
BUREAU OF INDIAN AFFAIRS  
TRUXTON CANON AGENCY  
VALENTINE, ARIZONA 86437

IN REPLY REFER TO:

Land Resources  
(802) 769-2279

Elaine F. Marquis, Area Manager  
U.S. Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Elaine:

We appreciate the opportunity you gave our Agency to review the land management plan for your Area on November 7, 1990.

As those present in the meeting brought up, we have concerns in the following areas:

- 1) We want to see the plan recognize the need for realigning and upgrading the Grapevine Canyon Road from Meadview Road to the Hualapai Reservation boundary. We hope to see that road be paved two lanes in the next 4-7 years and widened to three lanes in the next 7-15 years.
- 2) We want to plan for the trading of sections in the Clay Springs area to block up those checkerboard sections. Our staff will be submitting a proposal for your consideration in the next 2-3 months.
- 3) We want to plan for the legislative transfer of ten acres from BLM to the Hualapai Tribe for the tribal cemetery at Valentine.
- 4) We would like to pursue a cooperative agreement with your agency to reconstruct the fence between BLM and the Hualapai Reservation. We propose a 50/50 sharing of the costs.
- 5) We are concerned that your plan does not recognize the Mexican vole habitat in the Music Mountains just west of the Reservation.

Again, thank you and bill for taking the time to meet with us. We are looking forward to working more closely with you.

Sincerely,

*James C. Jones*  
ACTING Superintendent  
Truxton Canon Agency

Joe McGloin  
2716 W. 25th Ave.  
Denver, CO 80211  
11/29/90

Bill Carter  
BLM  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, AZ 86401

Good Day:

The following are my comments regarding the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for Kingman Resource Area. I appreciate the opportunity to make comments and commend the BLM for the amount of work that has been put into the draft RMP/EIS. I also applaud the BLM for the foresight that has been put into the RMP/EIS. The nature and makeup of the multiple use of our public lands has been changing and will continue to evolve over the foreseeable future. It is indeed refreshing to see a public lands manager address these changing needs and plan for those demands.

I generally agree with the preferred alternative (Alternative 2). There are several areas of concern to me which I will address.

I agree with the need to cut back or eliminate livestock grazing in certain areas, especially riparian zones. Whenever I have visited the area I have been struck by the amount of damage that has been done by the livestock to the native vegetation. As you know, the resulting erosion and changes in the flora caused by over-grazing will take decades, if not centuries, to undo. It only makes sense that ranchers (and consumers) should pay the full price for the consequences of grazing on public land. By this I mean not just the cost of land management services that they currently use but, additionally, the estimated costs of repairing the land and restoring it to its original condition. For too long the general public has subsidized ranching by footing the cost of land reparations, or even worse, land that is just discarded. I urge you to eliminate grazing in all ACEC's and in all riparian zones. And I urge you to charge grazing rates that will cover the full cost of the grazing and restoration of the grazed land.

I support the BLM plan to preserve historical sites. Pot hunters and vandals have already damaged the majority of sites in the Southwest and we need to preserve the few remaining ones even if that means prohibiting public access.

I have grave concerns about the use of OHV's in several areas. While any wilderness areas would be off-limits to OHV's, all ACEC's would remain open. This would include riparian zones and habitat for some endangered species. I've seen too much damage to riparian zones, vegetation and animal habitat from OHV's. I think it prudent to limit all OHV use in ACEC's to roads only. They must be kept out of riparian zones and critical habitat areas. Given the total amount of BLM land that OHV's can use, prohibiting their use from a very small percentage of the land would help preserve endangered animals, endangered habitat and historical sites.

I heartily endorse limitations on timber sales. Many once great stands have simply been destroyed over the last one hundred and fifty years and we need to preserve what's left. Restricting grazing will do much to help the forest regenerate.

In sum, my opinion is that the BLM needs to do as much as it can to preserve the land and, in many cases, to improve its condition after years of abuse. One of the best ways to accomplish this is to reduce the use of the land, especially from activities that take a great toll, such as OHV use and livestock grazing. Even the RMP/EIS recognizes that the use of the land will very likely increase from 200 to 300% over the next 10 to 15 years (p. 59). The land needs to be protected from this onslaught. This is your charge.

Sincerely,

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MARICOPA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT  
111 S. 3rd, Avenue, Room 300, Phoenix, Arizona 85003



December 6, 1990

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

RE: KINGMAN RESOURCE AREA RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Carter:

This Department appreciates the opportunity to review and comment on the Resource Management Plan and Environmental Impact Statement for the Kingman Resource Area.

We support the Bureau's continuing efforts toward the management and protection of public lands.

Maricopa County is currently revising our Comprehensive Plan and would like to coordinate with the Bureau of Land Management regarding many issues discussed in the Management Plan. Of particular interest to us are comments addressing management and protection of riparian lands and policies for off-highway vehicles.

If we may be of further assistance, please telephone our office at 262-3403.  
Sincerely,

JILL HERBERG-KUSY  
PRINCIPAL PLANNER  
PLANNING DIVISION

*Douglas A. Williams*

Douglas A. Williams  
Planner III  
Advance Planning Section  
(602) 262-3403  
JKM/mlc

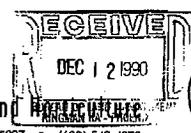
xc: Dennis W. Zwagerman, Director

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Arizona Commission of  
Agriculture and  
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FIELD SERVICES

Office of the State Chemist  
State Agricultural Laboratory  
Agricultural Chemicals and  
Environmental Services Division

December 11, 1990

Mr. Bill Carter  
ELM  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, AZ 86401

Dear Mr. Carter:

The Arizona Department of Agriculture has the following concerns about the Kingman Resource Area RMP and EIS Draft dated November, 1990:

1. Recreation and Public Purposes Act - Periodic outbreaks of insect pests (caddis fly, grasshoppers, etc.) in this area may require an eradication program by federal, state, or local government personnel. Because any eradication project involving pesticides will be seriously affected by such things as schools, parks, and recreational areas, any land use authorizations which could adversely impact on eradication projects should be carefully considered with regards to what effect a grasshopper infestation which can not be controlled with pesticides because of the proximity of schools, parks, or other areas of sensitive or concentrated populations will have on the people using the facilities.
2. Vegetative projects - The Department supports Alternative #1.

Sincerely,  
*Ivan J. Shields*  
Ivan J. Shields  
Director

IJS/me

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Sir,  
Thank you for sending me your  
"Kingman Resource Area Management Plan  
Environmental Impact Statement." You've  
really done your homework and I support  
your findings and recommendations.

I was especially encouraged to note  
that you addressed the desert tortoise,  
burro and wild horse habitat issue noting  
not only areas of habitation but healthy  
size limits.  
Thanks  
K. Walter

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Dec. 19, 1990

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Az. 86401

Mr. Carter:

In reviewing your draft for Management Plan/Environment  
Impact Statement, we took notice of no proposed horse trails  
for Mohave County.

A couple of months ago we approached Mike Kileman with a  
proposed plan for horse trails using Canyon Station Spring  
area as head point for the old Stockton Hill Road from Canyon  
Station to Lake Mead. Also from Canyon Station it is possible to  
ride in several different directions into the Cerbat Mountains.  
In your plans we see you are going to make a day use area at  
Canyon Station. There is no reason this couldn't be made into a  
mulite use area, as there is plenty of room.

Several people and groups have expressed interest in helping  
make this a reality, with donation of time and materials.

We realize that these trails would not be used just for  
horses, which is fine with us. We want everyone to enjoy them.

We ask that these plans be put up for consideration in the  
final draft.

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Thank You.

Sincerely,

*Frances Benigar*

Frances Benigar, P.O. Box 6456, Kingman, Az. 86402, 565-4280

*Connie Childers*

Connie Childers, 4435 N. Willow, Kingman, Az. 86401, 757-4728

CONSULTATION AND COORDINATION

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**ARIZONA  
STATE  
PARKS**

800 W. WASHINGTON  
SUITE 415  
PHOENIX, ARIZONA 85007  
TELEPHONE 602-542-4174

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DEPUTY DIRECTOR

December 20, 1990

Bill Carter  
Technical Coordinator  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

RE: Kingman Resource Area, DOI-BLM

Dear Mr. Carter:

We have received the draft report entitled "Kingman Resource Area: Resource Management Plan and Environmental Impact Statement". I have reviewed the document and am commenting pursuant to Section 110 of the National Historic Preservation Act.

Of the three alternatives proposed, I prefer Alternative 2 because it may result in the lowest impacts to cultural resources in priority cultural areas (as indicated by Table IV-1 of the Draft Plan/EIS). I realize that Table IV-1 does not reflect predicted impacts to cultural resources outside the priority areas, but it is my understanding that the agency's proposed continuation of existing CRM policies will provide such resources with adequate consideration and protection in the face of federal undertakings.

Thank you for providing this office with the opportunity to comment. We look forward to receiving a copy of the final RMP/EIS.

Sincerely,

Pat H. Stein  
Preservation Planner

for Shereen Lerner, Ph.D.  
State Historic Preservation Officer

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United States Department of the Interior

BUREAU OF MINES  
INTERMOUNTAIN FIELD OPERATIONS CENTER  
P.O. BOX 25686  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225



January 4, 1991

Memorandum

To: Bill Carter, Bureau of Land Management, Kingman Resource Area Office, 2475 Beverly Avenue, Kingman, Arizona 86401

From: Chief, Intermountain Field Operations Center

Subject: Review of Draft Resource Management Plan and Environmental Impact Statement, Kingman Resource Area, Arizona

Personnel of the Bureau of Mines reviewed the subject document as requested by Elaine Marquis, Area Manager, Kingman Resource Area Office, Bureau of Land Management, to determine whether mineral resources in the resource area were adequately discussed in the document.

The discussions of mineral resources present in, explored for, and produced from the resource area (pp. 7, 17-18, 95-99, 267-269) and of impacts to and from mineral development for the three alternatives (pp. 119-147) appear quite thorough. However, in the discussion of sodium and gypsum (p. 96) it appears as though the discussion of gypsum has been omitted. If the reference to "more than 4,000 feet of evaporitic horizons" refers to gypsum, then that should be specified. Except for the omission of the gypsum discussion, we believe that minerals have been adequately discussed in the document.

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for William Cochran

jez/bde

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4619 EAST ARCADIA LANE • PHOENIX, ARIZONA 85018

January 9, 1991

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

OFFICERS  
Charles J. Dabolt  
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Dora Todd  
Vice President  
Alison McDowen  
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Dear Mr. Carter,

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Elizabeth Heicher  
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Education  
Anthony B. Anthony  
Publicity  
Ken Smith  
Solar

On behalf of the Maricopa Audubon Society, I am submitting the following comments concerning the Kingman Resource Area's November 1990 RMP/EIS draft.

First, we support the implementation of Alternative II, the "preferred" plan, primarily because it places more area under special management than does Alternative III. We cannot support Alternative I, the "no action" plan.

The ACEC's which would be established by Alternative II, especially those which would be formed to protect the endangered Hualapai Mexican Vole and KRA's riparian resources, are a step in the right direction. The plan's call for the establishment of wildlife movement corridors is also applauded.

However, we must be critical of the priority given to improved range management in the KRA. We realize that your RMP/EIS draft refers the discussion of your grazing practices to previously completed EIS's. But the fact that these other documents outline plans for improved range management is irrelevant to our criticism.

The point we're trying to make is that the implementation of better range management needs to be a higher agency priority. Overgrazing is probably THE greatest cause of rural environmental degradation in Arizona. The extent of the problem is illustrated by the fact that at least seven of the 14 management concerns identified in your draft deal with issues associated with grazing.

Of course, we understand that you must operate under Federal

DEDICATED TO THE PROTECTION OF NATURAL WETLANDS IN AN ARID ENVIRONMENT

statutes which, due to the powerful livestock lobby, mandate the continuation of inequitable grazing privileges on public lands. But there is room within the regulatory framework to implement immediate range improvements.

Your draft report clearly outlines the current sad situation on your range. Of the 83 grazing allotments in the KRA, you categorized 57 of them as M or I, meaning their conditions could be improved with better management. That's 69%! In addition, only 25, or 30%, of the 83 allotments have signed AMPs. While it's true that all of these AMP's were recently completed, and it appears you're concentrating your efforts on the allotments with the greatest potential for improvement, the overall situation is still unacceptable.

Another example of your low priority for improved range management is seen in your forage allocation policies for newly acquired lands. They specify that lands acquired from the state would continue to be grazed at the level set by the state prior to exchange. The problem with this is that the Arizona State Land Department is required by state law to manage its real estate holdings for the sole purpose of generating revenues. Consequently, they aren't much concerned with improved range management. By extending the conditions of their leases you may be continuing the range abuses they've allowed.

It seems you've tried to deal with this problem by stating that grazing on all allotments will be monitored to adjust livestock numbers to achieve proper use of forage resources. But how long will that take? Hopefully, not as long as it's taking to complete signed AMP's for all of your allotments.

To summarize, we support the adoption of Alternative II and suggest that you accelerate the implementation of improved range management practices.

Sincerely,

Jeff Burgess  
Conservation Committee Member  
Maricopa Audubon Society

9-1

CONSULTATION AND COORDINATION

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## TranAm Energy Inc.

2770 EAST SKELLY DRIVE  
TULSA, OKLAHOMA 74133  
918-627-0555

MAILING: P.O. BOX 35523  
TULSA, OKLAHOMA 74153  
FAX: 918-627-0544

HALITE PROCESSING CO.  
7100A FLIGHTLINE DR.  
KINGMAN AIRPORT  
KINGMAN, AZ 86401

Bureau of Land Management  
Kingman Resource Area  
Elaine Marquis, Area Manager  
2475 Beverly Avenue  
Kingman, Arizona 86401

January 15, 1991

Subject: RMP ROW corridor omissions

Dear Elaine:

While reviewing the Kingman Resource Area, Draft RMP we noticed an omission of an existing, and proposed utility corridor on the Alternative 2, Special Management Areas Map.

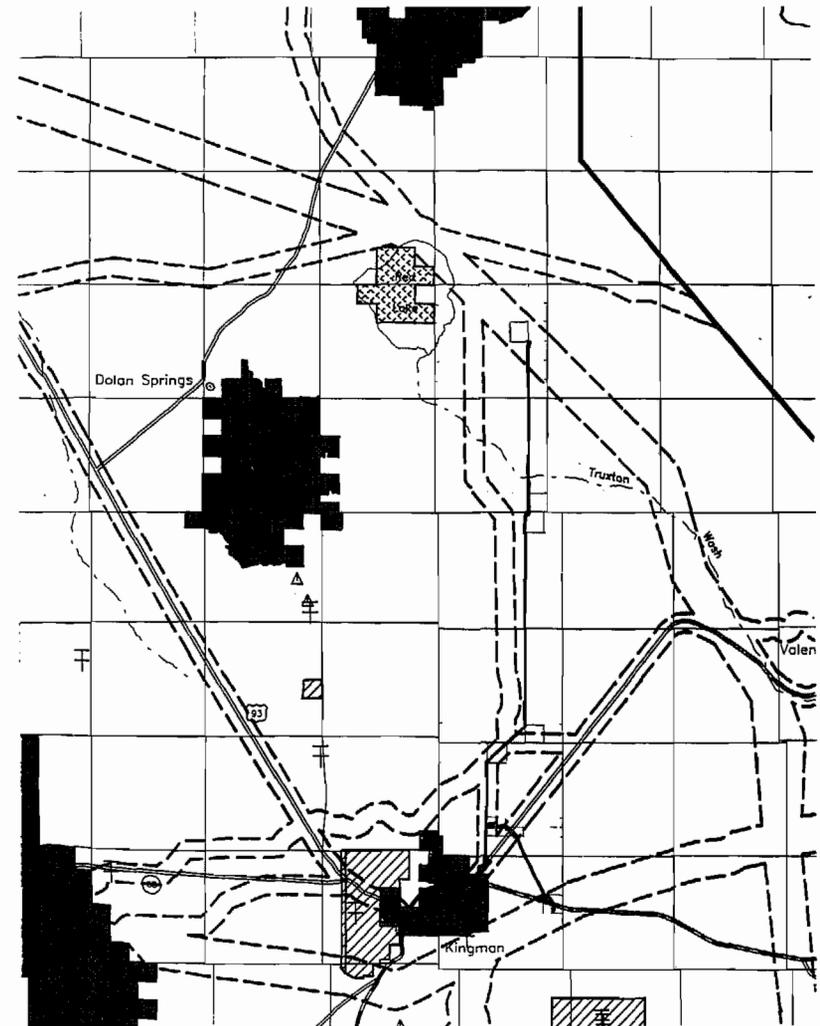
It would appear that omissions have also occurred on the Alternative 1 (Current Management), Special Management Map. Without checking the MTP, I believe that both the Williams Brothers, coal slurry pipeline corridor and the Four Corners Crude Oil/Trans Western Natural Gas corridor are missing.

I have submitted a map indicating our Alternative 1 from SE $\frac{1}{4}$ SE $\frac{1}{4}$  section 14, T. 26 N., R. 16 W. to near the east quarter corner, section 13, T. 21 N., R. 16 W., G&SRM. That portion of the route from the SW corner section 3, T. 25 N., R. 16 W. southward, follows rights-of-ways belonging to Southern Union or El Paso Natural Gas Companies, neither of which appear on Alternative 1 or 2 maps.

We will continue our review of the RMP, but felt these comments should be made now to allow you time to correct these discrepancies.

Sincerely,

Robert L. Harrison  
*Oliver M. Lusk*  
Oliver M. Lusk



250

10-1



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS UNITED STATES AIR FORCE  
REGIONAL ENVIRONMENTAL OFFICE, WESTERN REGION  
630 SANSOME STREET - ROOM 1315  
SAN FRANCISCO, CALIFORNIA 94111-2278

REPLY TO  
ATTN OF: LEEV-WR (Tye/705-1668)

JAN. 15 1991

SUBJECT: Kingman Resource Area Resource Management Plan and Draft Environmental Impact Statement (DEIS)

TO: Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

1. We appreciate the opportunity to review the subject DEIS and offer the following comments:

a. As shown on the attached map, the Kingman Resource Area evaluated in your DEIS is subject to numerous military overflights in the form of high-altitude and low-altitude training missions. Inasmuch as low-altitude overflights do have the potential to disrupt the solitude and naturalness of areas directly under their flight paths, we recommend you include consideration of such activities (location, altitude, and frequency) in your discussion and decision-making process.

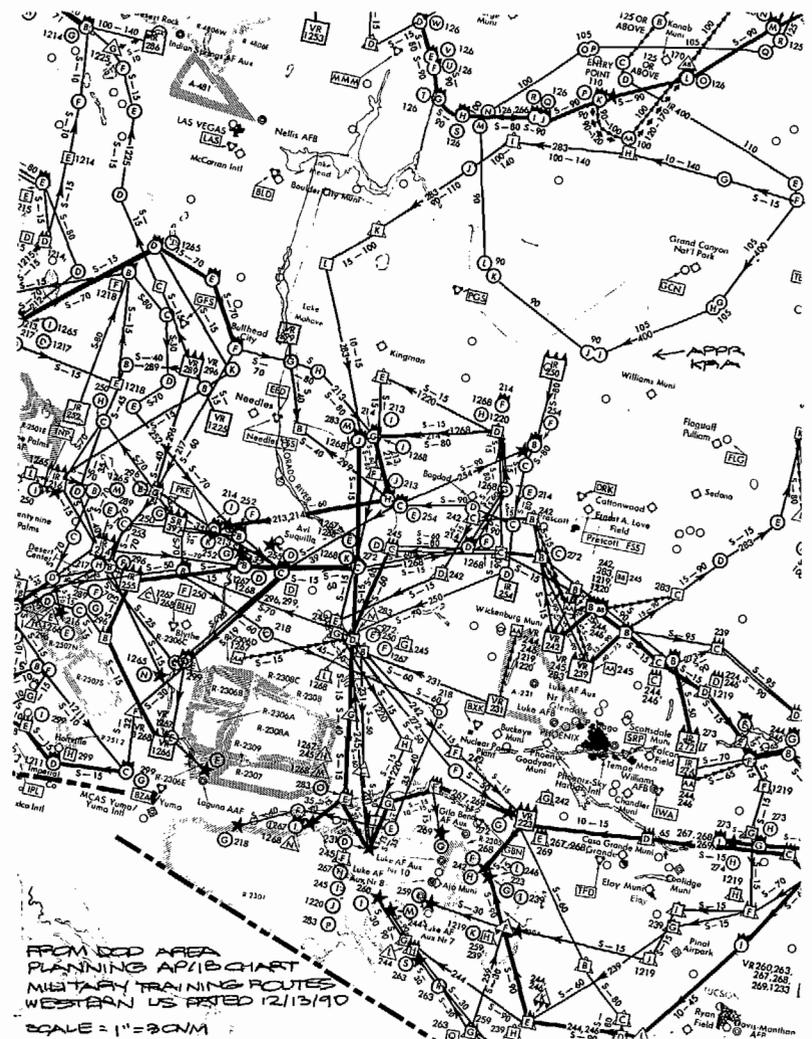
b. Areas which are appropriate for military overflights, specifically low-altitude training routes, are becoming increasingly rare. In selecting overflight training routes, the Air Force must consider mission requirements and fuel costs as well as environmental constraints. Ideally, training routes are located within areas which are relatively isolated, have diverse topography and minimal commercial activity, maintain sparse human populations, and contain lands under federal jurisdiction. It is obvious that these characteristics are also compatible to a large degree with land uses being proposed in the subject plan. Therefore, even though the area being studied is subject to air training activities, the Air Force generally supports low intensity uses in these lands if no degradation of our ability to use the airspace occurs.

2. We hope these comments are useful in your planning process. In the future, any NEPA documents from your location should be forwarded to our Western Region office, and not the Central Region office. If we can be of assistance in any manner, please contact the undersigned or Mr. Michael Tye at (415) 705-1668.

*Phillip E. Lammi*  
PHILLIP E. LAMMI, Director  
Regional Environmental Office  
Western Region

1 Atch  
Training Routes Map

cc: HQ USAF/LEEDX w/Atch  
FAA/AFREP w/Atch



12



**Department of Energy**  
 Western Area Power Administration  
 Phoenix Area Office  
 P.O. Box 6457  
 Phoenix, AZ 85005

JAN 16 1981

Mr. Bill Carter  
 Bureau of Land Management  
 Kingman Resource Area Office  
 2475 Beverly Avenue  
 Kingman, AZ 86401

Dear Mr. Carter:

The Western Area Power Administration (Western) has reviewed the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Kingman Resource Area. The RMP/EIS appears to limit the construction of new transmission lines and communications facilities to existing corridors and a few existing communications sites. A couple of exceptions were noted.

Western operates a network of communications facilities in support of the marketing and transmission of electrical power generated at Hoover Dam and several other sites along the Colorado River. Certain of the communications facilities and several transmission lines are located within and across the Kingman Resource Area.

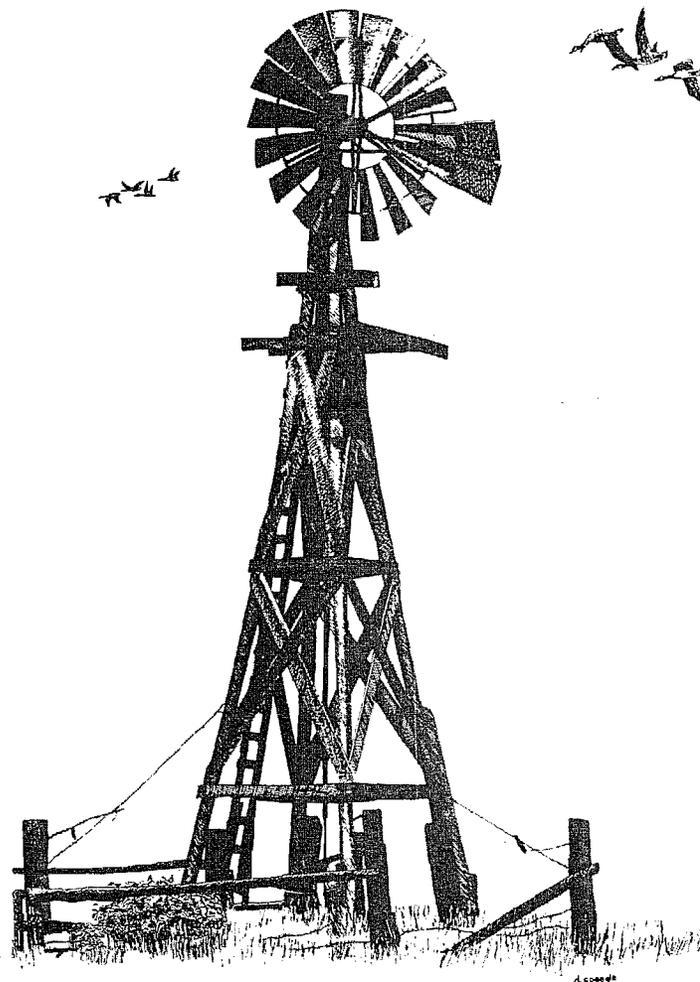
Western has identified Cherum Peak, Mt. Perkins and Groom Peak as potential sites for the installation of microwave repeaters and/or VHF Repeaters. These additions may be needed to operate our system in the foreseeable future.

12-1

Western would like to see the final RMP/EIS recognize our needs as stated above and have the flexibility to provide for future growth without requiring overhaul or amendment of the RMP to justify a new project or facility that may be identified and needed in the future.

Sincerely,

John D. Harrington  
 Deputy Area Manager





## ANIMAL PROTECTION INSTITUTE OF AMERICA

2831 Fullridge Road, P.O. Box 22505, Sacramento, CA 95822 (916) 731-5521 FAX (916) 731-4467

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VELMA JOHNSTON  
Wild Horse Home

HARRY DEARINGER

MRS. FRANK W. BRACK

CHARLOTTE L. B. PARKS

CLAUDE  
COURTESY OF ANIMALS

January 23, 1991

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

### DRAFT RESOURCE AREA PLAN/EIS Kingman Resource Area

Dear Mr. Carter:

We appreciate the opportunity to respond in behalf of our members to the draft RMP/EIS for the Kingman Resource Area. We found it difficult to track the impacts from one alternative to the next for the fourteen considerations being analyzed on the different resources of specific concern to us. Of concern to us are nongame wildlife habitat and wild horses and burros protection.

With the exception of wild horses/burros, the ongoing management constraints, commitments, and directives that underlie current management along with recommendations carried over from the MFP, appear to us to be sound. We could not find how or where the fourteen concerns required changing the overall management directions or that any of the concerns could not be adequately, properly, and safely addressed under current management directives and policies. However, the description of management directives and constraints for wild horses/burros found on Page 24 is factually wrong.

With regard to wild horse and burro management constraints, API reviewed the draft Cerbat Herd Management Area Plan and is in substantial agreement with it under existing management goals, policies, directives, etc. The HMAP details the method for determining an effective breeding population. It also estimates a viable herd as needing at least 120 animals in order to provide the gene pool in this terrain under current conditions to prevent inbreeding

continued . . .

API IS A NONPROFIT TAX-EXEMPT ORGANIZATION  
ALL CONTRIBUTIONS ARE DEDUCTIBLE FOR INCOME AND ESTATE TAX PURPOSES

Mr. Carter

-2-

January 23, 1991

and degeneration of the population. This, to us, would be a least feasible number. The law requires BLM to manage for optimum not least feasible or least sustainable--although there may be times when they are the same. When that occurs, the existing objectives to enhance or improve the habitat would allow BLM the management options to do so if possible. We disagree that dietary overlap studies are needed. The Congressionally-mandated National Academy of Sciences study recommended that determining spatial overlap, not dietary overlap, is the most critical factor for sound management. This determination would show if, where, and when competition actually occurs. This information is needed to properly ascertain what animal species is the cause of damage associated with overgrazing in order to meet the statutory restrictions on removing wild horses/burros from the public lands. The draft HMAP can be changed to list these as objectives to be monitored. In fact, that is current policy.

13-2

13-3

We believe this EIS should have considered the Cerbat HMAP information that estimated 120 animals needed for a viable population as a tolerance level for analysis purposes. We think also the mandate to the Secretary to provide habitat needs (shelter, water, forage, cover, space) for the optimum number should have been stated as a management constraint.

We can't agree with either Alternative 2 or 3. Both arbitrarily list the acceptable utilization level for wild horses as 30 percent when livestock are off the land and at 50 percent when livestock are on the land. This formula is geared for reducing horses. One might even suspect the purpose of it is to reduce horses--or at least protect livestock numbers when adjustments are needed due to overutilization. Also we are unable to agree with the management recommendation that any increases of forage in a wild horse/burro herd management area should be granted to re-introduced Big Horn sheep. An introduction of Big Horn sheep into an area designated as wild horse/burro habitat under the Wild, Free-Roaming Horse and Burro Protection Act, introduces a potential conflict into these areas. Granting all forage increases to Big Horn, rather than distributing it equally between current users, guarantees conflict.

13-4

13-5

The consequences of proper riparian management on livestock grazing is described, on page 125 as requiring permittees to herd their livestock or put up miles of fencing to create pastures for proper management by means of rotational grazing systems. That either/or description doesn't give adequate recognition to multiple use.

continued . . .

Mr. Carter

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January 23, 1991

13-6

The obvious consequence that should be considered would be to switch from cow/calf operations to cattle which can be herded, which are more mobile grazers; and which, because of both of these characteristics, are better fitted to the principles of multiple use/sustained yield. In our opinion, the intensity of herding required in wholistic grazing systems with the "on/off" movement of livestock, timed to estimated root recovery, requires keen coordination with the seasonal movement of wild horses/burros and other wildlife on and off their summer/winter ranges, not just more and more fences and not just livestock movement. Public land adaptations of wholistic grazing need to be initiated and driven by the biological needs and habitat requirements of wildlife (including wild horses and burros), whose movements may not be manipulated, rather than by the needs of domestic livestock whose movements can be manipulated. This needs to be spelled out so that the biological needs and habitat requirements of all wildlife (but particularly nongame) and wild horses/burros are provided for.

13-7

Alternative 2 (Page 43), that includes monitoring studies to be implemented when a need arises, AMPs in ACECs to be reviewed and revised, grazing systems developed in ACECs, and the continued development of grazing systems, appears to be a move away from the "I-C-M" categories, the current objective/monitoring schedule, and the schedule for trend-studyreviews under existing management goals. Reviewing AMPs in ACECs would automatically arise in the periodic review and adjustment of grazing permits required by Taylor Grazing so would be part of existing management. The creation of an ACEC would automatically be subjected to the EA/FONSI process under existing policies. But changes to the criteria of I-C-M is a major action.

API often criticizes the fact the criteria for I-C-M categorization is geared for increasing forage production while failing completely to address the state of the natural system in terms of damage and degradation. We have also criticized the "issue driven" management approach, which is based on the amount of social conflict raised rather than the amount of damage being done. In fact, we see "issue driven management" as relieving BLM, who are the managers and caretakers of the public's land (e.g., the hired professional experts), of all responsibility to initiate sound range management for correcting resource damage and all obligation to fully implement the protections in the laws related to the public lands. Amending the I-C-M criteria is the one management prescription we agree with in the preferred alternative.

continued . . .

Mr. Carter

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January 23, 1991

If management guidance already includes expanding, improving, and maintaining habitat for both consumptive and nonconsumptive use and also for meeting the commitments of Fish and Wildlife Plan 2000, Strategy for the Future, and Raptor Habitat Management plus implementation of the Wild, Free Roaming Horse and Burro Protection Act and other federal wildlife laws, it is difficult to figure out the differences in each alternative in Chapter II.

13-8

For instance, we don't understand why the watershed management provisions (categorizations) listed in Alternative 2 require an EIS rather than being an EA/FONSI action under Alternative 1. Since the classifications listed in No. 2 cannot be determined without the surveys already underway in the current management schedule we're not sure if the Alternative 2 approach will result in putting aside several years of surveys and monitoring by

13-9

introducing a new schedule that delays ever classifying land in a way to make an effective decision based on a degraded condition of the land. We don't understand how Riparian or Wildlife Habitat protection is better under

13-10

Alternative 2 than Alternative 1. This potential delay of decisions is a real stumbling block for us as it relates to both wildlife and wild horse/burro habitat. If those above commitments to the public (e.g., Watchable Wildlife, America the Beautiful, Plan 2000, etc.) are to be implemented in the current permit reviews and allotment evaluations, we hesitate to endorse what might be simply a delay of making those decisions.

One further comment we have with regard to wild horse/burro management refers to page 135 of the draft document. Here, it says "...if proper utilization levels on key forage species within the Cerbat Herd Management Area are exceeded, grazing preference would have to be adjusted or grazing management changed on...[six allotments within the HMA]." Taylor Grazing requires that! The document makes it sound as if this is some new revelation. The law very succinctly states that livestock grazing permits are to be reviewed periodically and adjustments made to bring the AUMs assigned to the permit into alignment with carrying capacity under multiple use considerations. Congress also wrote very clear constraints on removing wild horses into the law in order to prevent wild horses being used as scapegoats for damage by livestock. These two management directives are in need of clarification. The quote on page 135 clouds and confuses these two Congressional mandates when perhaps the Number One issue for the public is the fact the AUMs attached to livestock grazing permits have been adjusted only once since the Taylor Grazing Act was passed sixty years ago.

13-11

continued . . .

Mr. Carter

-5-

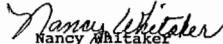
January 23, 1991

13-12 |

We find it hard to accept Alternative Two yet agree that the criteria for I-C-M categorization is badly in need of amendment and the categorization of watershed for prioritizing management actions is critical. In terms of wild horse/burro management, they've been given such short shrift in all three alternatives that none fully implement the law and all may very likely violate it. We do not see where problems related to acquisitions and withdrawals (e.g. the creation of ACECs or designation of lands for recreation purposes) cannot be acted-on under existing policy, site specifically, or that this blanket EIS adequately covers these issues. Since our experience has been with RMPs arising from grazing EISS, we feel something essential is being overlooked or that we have missed the critical and salient point in this issue-driven EIS.

FOR THE ANIMAL PROTECTION INSTITUTE OF AMERICA

Sincerely,



Nancy Whitaker  
Assistant Director of Public Land Issues,  
Specializing in Wild Horses

NW:np



14

Jan. 24, 1991  
Box 186  
Meadview, Az. 86444

Bill Carter  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly  
Kingman, Az. 86401

Dear Mr. Carter,

I'm writing to comment on the Nov., 1990 draft of the Resource Management Plan and Environmental Impact Study...#1792 (026).

I would like to go on record as being strongly supportive of Alternative #2. Although none of the options give as much protection as I would prefer to the Grand Wash Cliffs and Joshua Tree area up here, alternative #2 is surely the best of the three.

However, my concerns are more than just for the Joshua Tree area alone. I wish we could feel more assured that mining will never gouge or scar any of our scenic areas....specifically the twenty mile stretch of Grand Wash Cliffs and bench below, which are highly valued vistas that both visitors and residents treasure greatly. I would also hope that no mining will ever be allowed that will cause visual intrusions from any scenic views or overlook points.

More and more, the 'highest and greatest use' of lands up here, for the largest number of people, will indeed be that of enjoying its unusual and striking scenic beauty. And, a short twenty years from now, I'm sure residents will also appreciate having some areas preserved where one will still be able to enjoy quiet and solitude when this, too, is desired.

Walk in peace,

*Mary McBee*  
Mary McBee

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Box 186  
Meadview, Az. 86444  
Jan. 25, 91

Bill Carter  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly  
Kingman, Az. 86401

Dear Mr. Carter,

At the Jan. 24 meeting in Dolan Springs, one rancher requested that your agency should fill in, in red, the privately-owned sections of land on your display map, so this would be available and visible for audiences at following meetings.

I would suggest that if this is done, it would only be appropriate to also outline distinctly in red, the boundary lines to all grazing allotments so these are plainly visible. Some attendees may not realize that ranchers also utilize and graze these public lands.

I would like to go on record as being in support of Alternative #2.

Respectfully,

*Donald L. McBee*  
Donald L. McBee

cc: Elaine Marquis

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ARIZONA DEPARTMENT OF COMMERCE  
3800 NORTH CENTRAL AVENUE, SUITE 1400  
PHOENIX, ARIZONA 85012  
(602) 280-1300  
FAX: (602) 280-1305

ROSE MOFFORD  
DIRECTOR  
DONALD E. CLINE  
DIRECTOR

MEMORANDUM

TO : DOI BLM  
FROM : ARIZONA STATE CLEARINGHOUSE  
DATE : January 25, 1991  
RE : BUREAU OF LAND MANAGEMENT  
DRAFT RMP EIS KINGMAN RESOURCE AREA 15.999  
AZ901207800036

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

If the standard form 424 was submitted with the application it is attached for your information.

The project was supported as written. If further comments come in we will forward them to you for your consideration.

Attachment

cc: Arizona State Clearinghouse  
Applicant

TO:

DATE: 12-07-90

AZ 90-88-0036  
State Application Identifier (SAI)

SHPO  
Arizona State Parks Board  
1688 W. Adams, Rm. 109  
Phoenix, AZ 85007

FROM: Arizona State Clearinghouse  
3800 N. Central, 14th Floor  
Phoenix, AZ 85012

AZ Environ. Qlty Rm 304  
AZ Environ. Qlty Rm 400-B  
AZ Environ. Qlty Rm 603A  
Economic Sec. Ag. & Hort.  
Indian Affairs Tourism  
Transportation Health  
Public Safety Water  
Mineral Res. Parks  
Atty General Land  
Corrections Commerce  
Civil Rights Region I, II  
Education III, IV, V, VI  
Gov's Office for Children  
Administration - 424 Form  
JLBC  
DDD-DES  
Game & Fish  
Salt Rv Indian Clearinghouse  
Navajo Indian Clearinghouse  
Rev. Harold Minner Tech.

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM ONLY, AND ONE XEROX COPY to the Clearinghouse within 20 WORKING DAYS from the date received. Please contact the Clearinghouse at 280-1315 if you need further information or additional time for review.

No comment on this project  Proposal is supported as written  Comments as indicated below

- 1. Is project consistent with your agency goals and objectives?  Yes  No  Not Relative to this agency
- 2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar?  Yes  No
- 3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives?  Yes  No
- 4. Will project have an adverse effect on existing programs in your agency or within project impact area?  Yes  No
- 5. Does project violate any rules or regulations of your agency?  Yes  No
- 6. Does project adequately address the intended effects on target population?  Yes  No
- 7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar?  Yes  No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature

Date 1/2/91

Title

co-processor coordinator

Telephone 542-4009

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CONSULTATION AND COORDINATION

17

ARIZONA STATE  
UNIVERSITY

CENTER FOR ENVIRONMENTAL STUDIES

TEMPE, ARIZONA 85287

TO: Bill Carter, Bureau of Land Management  
 FROM: Julie Stromberg, Asst. Research Professor  
 DATE: January 29, 1991  
 SUBJECT: Comments on draft Resource Management Plan/Environmental Impact Statement for the Kingman Resource Area

After reading the Kingman Resource Area draft RMP/EIS, I find Alternative 1 to be unacceptable. Alternatives 2 and 3 each have some merit but some limitations as well. Alternatives 2 and 3 both represent positive approaches to managing for many resources and activities. The BLM is to be commended for recognizing the importance of riparian habitat and rare and endangered species habitat, and for proposing establishment of ACECs to protect these valuable and long-abused resources.

However, the associated management plans allow for uses that are incompatible with the management goals for the ACECs. Specifically, all cattle grazing and off-highway vehicle use should be discontinued within ACECs. There are many studies demonstrating the incompatibility of exotic animals (i.e., cows) with riparian resources and native species, while I know of no studies that show that livestock grazing or vehicle use enhances riparian systems or rare and endangered species.

Alternative 2 has merit over Alternative 3 in that it calls for ACECs of larger size. However, Alternative 3 has merit in that it: (1) calls for the reduction and eventual elimination of the ecologically destructive wild horse herd; (2) reduces levels of yucca harvesting and firewood cutting; and (3) eliminates grazing in two of the ACECs. There seems to be a need for a fourth alternative that combines the best aspects of Alternatives 2 and 3.

Multiple use management calls for the presence of many different uses within a given region, for example, grazing in one location, recreation in another. The multiple use policy should not be interpreted so as to allow simultaneous uses on the same piece of land. Too often, this type of management favors only one use to the exclusion of others.

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Office of  
Arizona State Mine Inspector1616 West Adams, Suite 411  
Phoenix, Arizona 85007-2827  
(602) 542-5971

February 5, 1991

Mr. Gordon Bentley  
 Bureau of Land Management  
 Kingman Resource Area  
 2475 Beverly Avenue  
 Kingman, Arizona 86401

Re: RMP Comment

Dear Mr. Bentley:

The State Mine Inspector has reviewed the KRA-RMP and we extend thanks for the opportunity to do so.

We find the RMP lacking an effort to locate abandoned mines and eliminate the hazards associated with them. Recreational use of Federal lands is increasing and most recreationalists have no knowledge of the dangers in and around abandoned or inactive mines. Therefore, in the interest of public safety, your plan should include elimination of such hazards.

Thanks again for the opportunity to comment.

Sincerely,

William C. Vanderwall  
 Assistant State Mine Inspector

WCV:krb

18-1

January 23, 1991

Bureau of Land Management  
Kingman District  
2475 Beverly  
Kingman, Az. 86401

To whom it may concern:

I am thoroughly appalled at the underhanded attempts of the BLM to hamper current and long term operation of the Bagdad Copper Mine. It frustrates me to witness the political ploys that have become such an essential part of our democratic bargaining process. Was it not enough that Congress, by way of our citizens, voted as they did on Arizona Wilderness bills #2570 and 1080? In my opinion the people have decided.

I have always been under the impression that the Bureau of Land Management's mission was to promote multiple use land management! It is my opinion that the BLM is being swayed by special interest groups. These special interest groups are striking at the very heart of Arizona's highly mineralized mining sectors. Media coverage and the well planned strategies of wilderness activists are effectively turning the tide and shifting the advantage to the side of preservation. If special interest groups, who are surely behind these management proposals, are successful at converting high potential, highly mineralized lands into Areas of Critical Environmental Concern, Desert Tortoise Habitat or Wild and Scenic designated areas, the mining industry, specifically Bagdad, would be forced to compete in world markets while incurring greatly increased production costs or worse yet forced out of business entirely.

What this entire issue really boils down to are two separate factions attempting to prioritize economy and ecology. True resolution can only be achieved through balance. It is ludicrous to think that a Government agency would attempt to place such severe restrictions on a well established, profitable and significant tax contributing company and community. This is actually a much bigger issue than one of ecology. We must continue to maintain our country's economic superiority if we are to continue to provide a balance in world peace. Granted we are one copper producer among many but we must set a precedent.

Though preservation is needed and appropriate in some circumstances, Multiple Land Use properly administered can provide the balance needed to succeed and survive.

My thoughts are summed up by a quote from Aldo Leopold, a pioneer in the preservation movement. This particular quote comes from his writings titled "A Sand County Almanac".

"The bulk of all land relations hinges on investments of time, forethought, skill and faith rather than on the investment of cash. As a land-user thinketh, so is he."

Here at Cyprus Bagdad we are governed and abide by very strict Environmental Federal Code of Regulations. Compliance with these regulations coupled by efficient multiple land use management on the BLM's part is in my opinion sufficient to guarantee absolute minimal disruption of the surrounding ecology.

I strongly urge the BLM to remove from consideration the various proposed designations located within the Upper and Lower Burro Creek areas.

Sincerely,



John D. Pettit

cc: Dennis DeConcini  
Jon Kyle  
John McCain  
Bob Stump

20


**Carson Water Company**

 P. O. Box 98510  
 Las Vegas, NV 89193-8510

February 14, 1991

 Mr. Bill Carter  
 United States Department of the Interior  
 Bureau of Land Management  
 Kingman Resource Area Office  
 2475 Beverly Avenue  
 Kingman AZ 86401

 Re: November 1990 Draft Resource Management Plan/Environmental Impact  
 Statement for Kingman Resource Area

Dear Mr. Carter:

Carson Water Company (Carson Water), a wholly-owned subsidiary of Southwest Gas Corporation, has reviewed the November 1990 Draft of the Resource Management Plan/Environmental Impact Statement (RMP/EIS) prepared by the United States Department of the Interior, Bureau of Land Management (BLM) for the Kingman Resource Area and respectfully submits the following comments and recommendations for consideration by the BLM.

Carson Water is the owner and operator of the Cane Springs working ranch located in the heart of the Red Lake area in Mohave County, Arizona, some 30 miles northwest of the city of Kingman. Carson Water has owned and operated the Cane Springs Ranch on which it grazes livestock and operates a number of water wells since 1979.

Under the Draft RMP/EIS for the Kingman Resource Area a significant portion of Carson Water's Cane Springs Ranch in the Red Lake area would be designated for the use by off-highway vehicles. For many reasons, including environmental and safety concerns, Carson Water strongly opposes and objects to the BLM's proposed plan to designate and set aside a substantial portion of the Red Lake Area, which encompasses Carson Water's Cane Springs Ranch, for the operation of off-highway vehicles.

The designation of such area as an off-highway vehicle area would not only greatly interfere with and impede Carson Water's livestock grazing operation at its ranch, but it would also create serious environmental, safety and public liability problems for Carson Water. The increased traffic to and from the off-highway vehicle area would unquestionably create significant safety hazards for people and livestock alike as a result of open range livestock traveling access roads in the Red Lake area. Furthermore, the operation of off-highway vehicles in such area over the next twenty years

 Mr. Bill Carter  
 Page 2  
 February 14, 1991

would, in Carson Water's opinion, cause irreparable injury and damage to the environment including soil erosion, visual scars to the landscape and the possibility of damaging cultural artifacts and disturbing wildlife habitat. Additionally, what assurance would Carson Water have that the operators of such vehicles would remain on BLM property and not trespass upon its property and in so doing disrupt its grazing operations and otherwise interfere with its use and enjoyment of the property?

It should also be noted that Carson Water did not protest or voice any opposition to the BLM's recent designation of fourteen (14) sections of its Cane Springs Ranch property as a wilderness area. While Carson Water favors the continuing development of public lands for public recreational purposes, Carson Water feels that it has more than met its civic/community responsibility as a corporate citizen. How much more land should Carson Water be expected to donate or devote for public recreational purposes?

In conclusion, for all of the above reasons, Carson Water respectfully requests the BLM to adopt Alternative 1 with respect to the Red Lake area and to remove the Red Lake area from consideration for use as an off-highway vehicle recreational area.

Sincerely,

 Charles R. Neely  
 Director

jla

 Elaine Marquis, Area Manager

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20-1

21



**YAVAPAI**  
PRESCOTT ♦ INDIAN ♦ TRIBE

February 12, 1991

Ms. Elaine F. Marquis  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, AZ 86401

Dear Ms. Marquis:

Thank you for sending copies of the draft Kingman Resource Area Resource Management Plan and Environmental Impact Statement as well as sending representatives from your office to personally explain them to us.

While the Yavapai-PreScott Indian Tribe is concerned with all aspects of the document since we desire to preserve the natural environment as much as possible, we have immediate interests in the cultural resources sections (pages 110 and 159-180). As you no doubt are aware, the area of the Juniper Mountains (Map 1, North Half Planning Area) and much of the region east of the Aquarius Mountains and south of Bill Williams Fork (Map 2, South Half Planning Area) were within the aboriginal territory of the Yavapai.

We know that the Kingman Resource Area is large and that at present you have but one cultural resource specialist to cover the area. It is clear that as funding and personnel become available--a critical need--much of the portions described above will need to have intensive cultural resource surveys done. Ideally, before your Environmental Impact Statement is complete, these surveys should be accomplished in a state-of-the-art professional manner as required by the National Historic Preservation Act as amended.

We wish to emphasize that this should be done to document and preserve all historic and prehistoric Native American sites, not only those of the Yavapai but also of all other significant archaeological remains.

21-1

The cultural resource paragraph on page 110 needs to be expanded and elaborated, especially in terms of the Cultural Resource Management guidelines on pages 159 and 180.

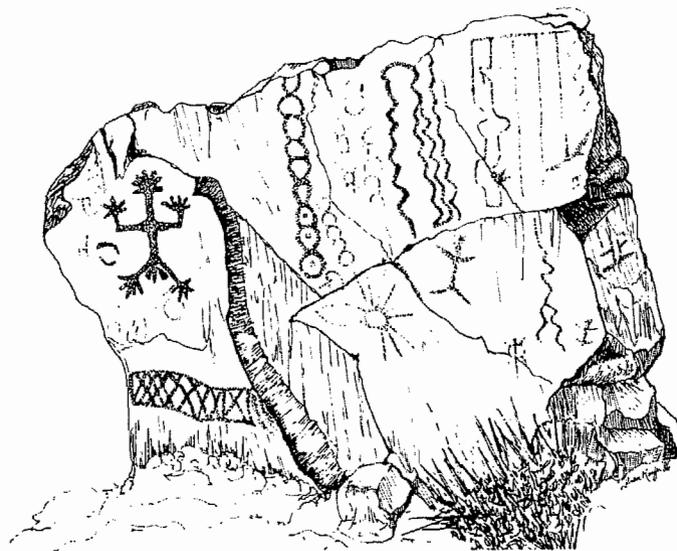
We shall support these expanded efforts in any manner feasible to the Yavapai-PreScott Tribe.

Sincerely,

*Robert C. Euler*  
Dr. Robert Euler  
Tribal Anthropologist

RE:nq:L01

530 E. MERRITT PRESCOTT, AZ 86301-2038 (602) 445-8790



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CONSULTATION AND COORDINATION



ROSE HOFFORD  
GOVERNOR

Arizona  
State Land Department

1818 WEST ADAMS  
PHOENIX, ARIZONA 85007



M. J. HASSELL  
STATE LAND COMMISSIONER

February 25, 1991

Mr. Henri Bisson  
District Manager, Phoenix District  
U.S. Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Bisson:

This is in regard to the Kingman Resource Area Plan draft and Environmental Impact Statement report that you sent to us for review and comment.

We have reviewed the report, have been briefed on the plan by Jesse Juan and Gordon Bentley of your Kingman Resource Area Office, and have discussed the plan with you on several occasions.

Your staff has done an excellent job of evaluating the resource potential, obtaining public input, and preparing a resource management plan. As you know, the State Land Department has worked closely with the BLM in making land exchanges to move Trust lands out of environmentally sensitive areas that should be managed as public lands, and in coordinating management of intermingled Trust and public lands. We therefore endorse, with two minor exceptions, the Resource Management Plan and want to continue to work with the Bureau of Land Management to help implement the plan.

There are two areas which the plan designates lands for retention by the Bureau of Land Management which we believe should be made available instead for transfer to the State Land Department as part of our on-going Federal/State land tenure adjustment program. These areas are:

22-1

- 1) The block of Federal lands in the Golden Valley area on the west side of State Highway 93 in T22N, R18W and the east tier of sections in T22N, R19W, and
- 2) The Federal lands south of Bullhead City in Sections 4, 5, 6, 7, 8 and 9, T19N, R21W.

Mr. Henri Bisson  
February 25, 1991  
Page 2

These two blocks of land are adjacent to developing areas and, in our view, are more suitable for use for the mission of the State Trust than for Federal land management. For example it would be much more advantageous for the State to have the Bullhead City or Golden Valley lands than to retain the Trust holdings in such areas as the upper Burro Creek riparian area which your plan designs for special management.

Our goal will be to complete our program of State/Federal land ownership adjustments in the Kingman Resource areas when it is possible to do so. We would like to have these two areas designated for disposal and to have you hold these lands for eventual transfer to the state.

Sincerely,

M. Jean Hassell  
State Land Commissioner

MJH:GEC:rmp

cc: [redacted], Manager, Kingman Resource Area  
Glendon E. Collins, Deputy State Land Commissioner  
Robert Yount, Director, Natural Resources Division  
Pat Boles, Prescott Office, State Land Department

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Fred T. Boice, Tucson  
Harb Metzger, Flagstaff  
Walter Armit, Tucson  
Lynn Anderson, Peoria  
Bob Bowman, Sonora  
Jim Webb, Phoenix  
\*Deceased



## Arizona Cattle Growers' Association

1401 North 24th Street, Suite #4 • Phoenix, Arizona 85008 • Telephone (602) 267-1129

February 28, 1991

Mr. Henry Bisson  
District Manager  
Bureau of Land Management  
Phoenix District  
2015 W Deer Valley Rd.  
Phoenix, AZ 85027

Dear Mr. Bisson:

The Arizona Cattle Growers' Association has reviewed a copy of the Draft Resource Management Plan for the Kingman Resource area. After reviewing the draft plan we have been unable to determine what changes would be in store for the permittees in the Kingman Resource Area.

Could you please send us a summary of changes which would occur if the proposals in the draft plan are implemented into the final plan. We are concerned with changes in preference numbers, livestock management, access, range improvements construction and maintenance, and all other changes which will occur that will impact permittees in the Kingman Resource Area.

After receiving a written response to this letter we plan to send comments on the Draft R.M.P.

Thank you for helping us determine what changes will occur to the permittees in the Kingman Resource Area when a final plan is implemented.

Yours Truly,

Sandy Naughton  
Executive Vice President

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

SN:km

24

**Elliott E. Bernshaw**

P.O. Box 526235, Salt Lake City, Utah 84152 (801) 278-5358

March 7, 1991

Bill Carter, Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Ave., Kingman, Ariz. 86401

Dear Bill Carter:

### COMMENTS ON KINGMAN R.A. DRAFT MANAGEMENT PLAN

Please accept these comments on your Kingman R.A. Draft Management Plan and E.I.S.:

1) Joshua Tree Forest area. I urge you to do everything possible to secure for the long-term future the preservation of the natural values of the Joshua Tree Forest-Grand Wash Cliffs ACEC. From my travels throughout most of the western U.S., I speak from experience when I say that it is a very special area that deserves special attention and any and all means of protection, even increased or full-time ranger patrols for management enforcement.

2) The desert tortoise. This key indicator species must be protected by any and all means. For a first step, consider removing entirely commercial livestock grazing from all major tortoise areas.

3) Livestock grazing. In view of the increasing general scientific consensus that the commercial grazing of alien livestock species is detrimental to indigenous natural values of much of the arid American West, I urge you not to allow for any overall increases of grazing AUM's in your R.A. Instead, as any rangeland improvements allow for increased AUM's in certain allotments, consider transferring livestock permanently out of other allotments that have high natural values (like desert tortoise habitat, etc.).

To go further, however, I would support the growing view that commercial livestock operations, whether traditional or not, are generally out of place on public land and are better suited on private land, especially such private and moister land back East. You may also consider auctioning AUM's to the highest bidder so that environmental and recreational groups could bid against ranchers and thereby "buy-out" controversial grazing uses. Amen.

Yours truly,

Elliott Bernshaw

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23-1

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GRAPEVINE SPRINGS RANCH, INC.  
P. O. Box 1016  
Wickenburg, Arizona 85358

GRAPEVINE SPRINGS RANCH, INC.  
P. O. Box 1016  
Wickenburg, Arizona 85358

March 8, 1991

protected and kept them that way in effect, since 1905 and have every intention of continuing to do so. Only three (3) springs have received any damage at all and they were damaged by miners who gained access to them thru public land even though, we complained to the Bureau of Land Management in at least one case that the damage was occurring. It seems to us that if you were truly interested in protecting the springs, you would have them deeded to us as private property.

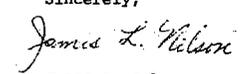
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Thank you for your consideration.

Attn: Mr. Bill Carter

Sincerely,

Dear Sir:



This is to inform you that the Grapevine Springs Ranch, Inc. of the Santa Maria Community Allotment - Phoenix Resource Area is in support of Alternative #1 of the Kingman Resource Area/Resource Management Plan and Environmental Impact Statement #1792 (026) November 1990.

James L. Nelson  
Secretary-Treasurer  
Grapevine Springs Ranch, Inc.

25-1 We are opposed to Alternatives #2 and #3 on the basis that the acquisitions of private lands by the Federal Government, the closing of public lands to mining and livestock grazing and the designation of private lands as an Area of Critical Environmental Concern will greatly reduce the tax base of already poor counties of the State of Arizona and will greatly decrease the value of private property.

The 480 acres of deeded property (S $\frac{1}{4}$  of the S $\frac{1}{4}$  of Section 15 and the S $\frac{1}{4}$  of Section 16 all in Township 11 North, Range 11 West) of the Grapevine Springs Ranch, Inc. located in Lapaz County Arizona on the Southside of the Santa Maria River are not for sale and have never been for sale. We are strongly opposed to the acquisition of our property by the Bureau of Land Management or any other governmental agency by any means.

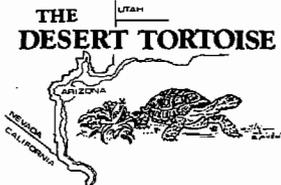
25-2 We are strongly opposed to the extension of the boundary of the Kingman Resource Area to include our private land and the eight (8) springs known as the Grapevine Springs, of which we have the water rights to and are on or adjacent to our private land, as an ACEC (Area of Critical Environmental Concern) as it will adversely affect our use of our land and therefore have a great adverse economic impact on our family corporation.

The Springs are in a pristine condition because we have

Cont.

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THE  
DESERT TORTOISE COUNCIL



March 7, 1991

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Mr. Carter:

The Desert Tortoise Council has reviewed the draft Resource Management Plan/Environmental Impact Statement for the Kingman Resource Area. We provide the following comments.

We are in favor of the proposed desert tortoise ACECs and those that harbor tortoises but without mention of tortoises. We strongly feel, however, that tortoise habitat outside these areas is in dire need of attention for the population to remain viable into the future. All the ACECs do not contain in themselves viable tortoise populations, but seem to make up cores of populations. As very careful and conservative management as possible is needed in these other habitats.

26-1

Page 47. Where are the proposed corridors geographically? The several maps provided in the document are useful, but something like this should have been mapped. Which are intended for desert tortoise movement? We can not tell whether BLM's analysis is accurate otherwise. Two miles seems very narrow if the majority of vertebrates are to benefit from these corridors. We advocate a 3-4 mile width and request BLM retain as wide an area as possible, particularly for the longer corridors.

26-2

Page. 50, Animal Species. Were not candidate species habitats considered for ACEC designation? All tortoise habitats greater than category III should have been considered, and the tortoise is a candidate species. Why is this section not described as it is for special status plants?

26-3

Page 51. The Black Mountains ACEC on Table II-5 does not mention the desert tortoise habitat, its category, or necessary prescriptions for the Black Mountains. Why is the tortoise ignored in this area? The area inhabited by desert tortoises should be closed to vehicle use in washes.

26-4

Page 52. The Western Bajada ACEC is best managed as withdrawn from mineral entry, as impacts can not be fully mitigated and recovery from mining is essentially nonexistent in terms of value to the desert tortoise. We agree that vehicles should not be driven in washes in this ACEC. Wild burro numbers should be kept

26-5

to a minimum here to avoid conflicts for forage and cover, and to avoid killing young tortoises through trampling or destruction of coversites.

Page 53. White margined Penstemon Reserve ACEC. This area contains significant desert tortoise values. Why are they ignored? We agree that OHV's should not be driven in washes in this ACEC so that conflicts with tortoises are minimized. A recovery plan is not needed as this plant is not federally listed.

The Eastern Bajada area of the Black Mountains desert tortoise habitat should be an ACEC. With the scale of tortoise map and ACEC maps, we can not tell what BLM has done with this area. Since BLM has a study plot here, and not at other sites, we believe this must be very significant habitat, however, it appears summarily ignored in this plan in terms of tortoise recognition and prescriptions. We strongly suggest this be rectified in the final.

Page 54. McCracken ACEC. Some significant washes used by desert tortoises should be closed to OHV use. We feel that this is an area where withdrawal from mineral entry would be very prudent as it is a distinct threat to this population.

Poachie ACEC. We agree with limiting OHVs to existing roads and trails and no washes. At a minimum, mandatory bonding and Mining Plans with careful attention to tortoise compensation should be vigorously pursued for all these desert tortoise-related ACECs.

26-6

Aubrey Peak ACEC. The desert tortoise is not mentioned here. We are sure this is significant tortoise habitat. How does it fit into the greater picture of tortoise distribution and habitat categories and proposed habitat management?

Page 78. We advocate the conservative approach for all desert tortoise ACEC of closure to livestock grazing. Alternative 3 should go this extra step and should be selected in the final plan.

The plan should also prohibit boulder "coversite" disposals or sales from Sonoran desert tortoise habitat as these are the homes of desert tortoises and cannot be replaced.

26-7

Page 87. Change in habitat category is wholly inadequate threshold for monitoring. Categories are full of non-biological criteria. BLM should instead say that downward population trends, increases in mortality, reductions in forage, and other habitat-related biological factors will trigger review of decisions or activity plans.

26-8

Page 128. Tortoises and their habitat would suffer long term cumulative impacts from mineral development scenarios projected for the area. These are not mentioned in the Impacts to wildlife habitat section.

Page 137. Slightly less long term impact to the desert tortoise from mineral development would occur when compared to Alternative 1. This is not discussed or analyzed in the document.

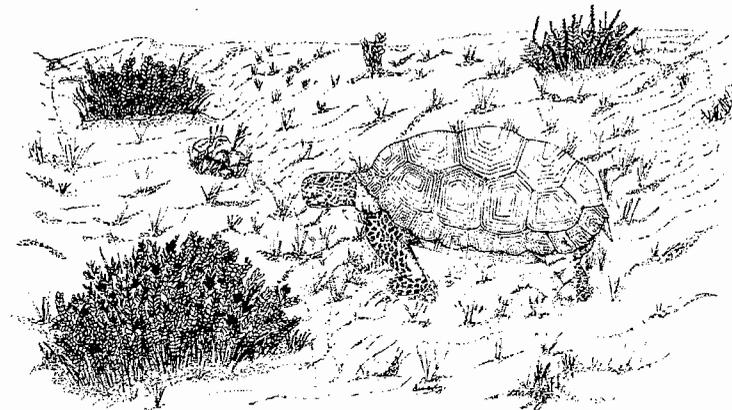
26-9

The RMP draft is vague in describing how the desert tortoise rangewide plan of BLM will be implemented. Since RMPs are the guidance document for how public lands will be managed in an area, we expect specificity with respect to management schemes and BLM's analysis of what these will do for the desert tortoise. For instance, we can not discern, in most cases, what grazing regimes are planned in desert tortoise habitat to ensure livestock impacts are minimized or eliminated.

We appreciate the opportunity to comment on this draft and we will continue to be involved in this area as we have in the earlier stages of your planning effort.

Sincerely,

  
Dan Peterson  
Senior Co-chairman



27

MOHAVE COUNTY BOARD of SUPERVISORS

P.O. BOX 390 • KINGMAN, AZ 86402
TELEPHONE 753-0729 • FAX 753-0732



Dist. 1 W.J. Roper, Dist. 2 Ron Bernstein, Dist. 3 Jerry A. Holt, Dist. 4 Lois J. Hubbard, Dist. 5 Becky Foster
County Manager David J. Grisez, Clerk of the Board Pat Chastain

March 12, 1991

Ms. Elaine F. Marquis
Area Manager
Kingman Resource Area Office
Bureau of Land Management
2475 Beverly Avenue
Kingman, AZ 86401

Dear Ms. Marquis:

Proper utilization and management of our area resources is vital to Mohave County. Of course, the Bureau of Land Management is extensively involved in that management. After reviewing the recent Kingman Resource Area Resource Management Plan and Environmental Impact Statements, I encourage you to consider some pertinent information.

27-1

Livestock grazing needs to be addressed in the final RMP (Resource Management Plan). Grazing is one of the most long standing uses of public land and is the most widespread use of the land.

The selection of simply alternative 1, alternative 2, or alternative 3 is not the best solution for the final RMP. Alternative 1 has the best overall guidelines for livestock grazing, but needs to have portion of alternative 2 and 3 incorporated as well. Most of the shortcomings of alternatives 2 and 3 deal with the ACECs (Area of Critical Environmental Concern) proposed. Many of the proposals and commentary seem to deal with areas that are not now and probably will not suffer from "irreparable damage".

Perhaps if BLM would contact ranchers and livestock owners in the area to obtain more of their input many of these shortcomings of the RMP could be alleviated. It is my hope that BLM will ensure proper consideration of all those using our public lands.

Sincerely,

Lois J. Hubbard (handwritten signature)

Lois J. Hubbard
Supervisor, District 4
Chairman, Board of Supervisors

cf

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28



Arizona Farm Bureau Federation

March 11, 1991

Mr. Henry Bisson, District Manager
Bureau of Land Management, Phoenix District
2015 West Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Bisson,

28-1

We oppose the Kingman Resource Area/Resource Management Plan and Environmental Impact Statement as currently proposed.

We oppose the plan based on the following policy from the 1991 American Farm Bureau Federation Policy Book passed in Phoenix in January, 1991.

Management of federal rangelands

We support multiple-use management of federal lands with full consideration given to scientific range management methods which would consider weather trends (long- and short-term), use patterns, plant numbers, plant size and other applicable factors.

We favor legislation to permit prescribed and controlled burning and other means of vegetative control on federal lands including wilderness areas.

We believe permittees on federal lands should be encouraged to improve range conditions through cooperative contracts with the appropriate agencies. Permittees should be provided security of investment. We support adequate federal funding for an expanded cooperative range improvement program. We strongly support and encourage the continuation and expansion of the Experimental Stewardship Program and the coordinated resource management process. The Bureau of Land Management (BLM) and the U.S. Forest Service (FS) are urged to work toward the establishment of at least one stewardship ranch on each national forest and on each grazing district.

We believe that federal agencies should be required to participate 50-50 with private landowners in building and maintaining line fences between federal land and adjacent land. We oppose BLM and FS fencing standards that are impractical for stockmen. Livestock owners should be compensated for losses which result from livestock entering restricted areas on federal lands.

Public land management agencies should take a more active role in defending livestock grazing as an integral part of the multiple use concept.

We urge FS and BLM to review their recent road closures to ensure access to remove deadfall and for multiple uses.

We oppose the provision of the Federal Land Policy and Management Act of 1976 which granted police powers to the BLM and any BLM attempt to exercise such powers. Police power must be retained by established local law enforcement authorities. Federal agencies should keep accurate records of time and money spent on the management of grazing lands apart and separate from their other duties.

3401 EASTELWOOD STREET, PHOENIX, AZ 85040-1625 602 - 470-0088

CONSULTATION AND COORDINATION

Mr. Henry Bisson, District Manager  
March 11, 1991  
Page 2

Overgrazing and damage to rangelands by wild horses, burros or game animals should be managed by control of wildlife populations. Federal land management agencies should acknowledge the adjudication of available feed and consider range conditions in granting permission to state and federal departments of wildlife for introductions or augmentations of wildlife species on public lands. If it becomes necessary to reduce livestock numbers on public ranges because of drought, big game, wild horse and burro, numbers should be proportionately reduced to protect range from long-term damage.

We favor repeal of the Wild Free-Roaming Horses and Burros Act of 1971. Ownership and management of such animals should revert to the respective state in which they reside in order to provide effective control methods and disposal to prevent damages by these animals to ranges and unacceptable competition with livestock grazing. Domestic livestock grazing permit rights should not be reduced or eliminated as a result of misuse of public lands by wild horses, burros or game animals. Therefore, any plan calling for an introduction or expansion in the number of wildlife in any area must be preceded by a complete impact statement by independent professional range managers. Responsibility for trespass and compensation should be clearly established.

We believe permittees on federal lands should be compensated for economic losses experienced when grazing permit rights are reduced or terminated to allow the lands involved to be used for another public purpose or when the reduction or termination is due to no mismanagement by the permittee.

We favor allowing supplemental feeding on federal ranges. There is no need for BLM intensive management of isolated tracts where these tracts are a small part of operating ranch units.

Grazing advisory boards should be restored permanently and their procedures revised to provide effective input from livestock grazing permittees.

We believe the allotment management planning process should be streamlined to ensure that a fair settlement can be achieved in a timely manner. Once agreement has been reached with all interested parties, the matter should stand as resolved.

We recommend federal land agencies make available to the public a map of specific roads for recreational use.

Congress should establish land use principles for the grazing of federal lands. These should include:

- (1) Long-term contracts stipulating terms and conditions of grazing use;
- (2) Adequate incentives for optimum investment in private and public lands range improvement;
- (3) Conditions relative to multiple use including watershed protection, hunting, fishing and recreation;
- (4) An appeal procedure;
- (5) Severance damages;
- (6) Trespass regulations;
- (7) A requirement that the permittee be granted the increased grazing capability which accrues from improved range management. Range condition terminology should be consistent with current range potential. U.S. government grazing land should be sold to private citizens or managed so that it will bring about a fair return for its current value;
- (8) Grazing rights defined by animal unit months (AUM) are bought and sold as personal property and therefore should be considered as such by all government agencies;

Mr. Henry Bisson, District Manager  
March 11, 1991  
Page 3

- (9) Grazing fees equitably established within the basic principles of the current grazing fee formula for federal lands; and
- (10) A broad-based public relations effort to improve the public image of public land grazing.

We support a voluntary assessment of livestock operators with public land permits for a campaign to inform and educate the American public on the benefits by continued multiple use of public lands' renewable resources."

28-2

We also would request a clear delineation of BLM allotments and co-mingled allotments. This is important for clear public understanding. If all of the land in the allotment is BLM land, it should be called a BLM allotment. If, however, private land is co-mingled in the allotment, it should be called a co-mingled allotment.

We would appreciate an executive summary of changes facing permittees in the Kingman Resource Management Area if this plan is approved.

We appreciate the opportunity to comment on this plan.

Sincerely,  
ARIZONA FARM BUREAU FEDERATION

*Cecil H. Miller Jr.*

Cecil H. Miller Jr.  
President

BW/bmt

ROBERT L. HARRISON  
Registered Professional Geologist\*  
P. O. Box 7228  
Brookings, Oregon 97415  
Telephone: (503) 469-1966

Bureau of Land Management  
Kingman Resource Area  
Bill Carter  
2475 Beverly Avenue  
Kingman, Arizona 86401

January 16, 1991

Subject: RMP Comments

Dear Bill:

I read the Kingman Resource Area, Draft RMP, with interest due to my early involvement in its development. I am sorry to say that after reading, I felt it had been written with personal agenda's as the driving force rather than the need to identify sound resource management policies.

I would like to quote from several sections in the RMP and discuss inconsistencies and other problems I believe have been written into the plan.

Chapter I  
Purpose and Need  
Page 7  
Issue 6

*"The minerals industry has had a long and profitable relationship with communities and citizens of these portions of Mohave, Yavapai, and Coconino counties with in KRA boundaries. Mountain ranges and intervening valleys throughout the area contain a wealth of minerals..."*

*The Mining and Minerals Policy Act of 1970, FLPMA, Research and Development Act of 1980, and National Materials and Minerals Policy all direct BLM to actively encourage and facilitate the development of public land mineral resources by private industry to satisfy local and national needs and provide for economically and environmentally sound exploration, extraction, and reclamation".*

Support of the development of the mineral resources on public lands is further encouraged by the BLM's Multiple Resource Use Concept and the BLM Mineral Resources Policy of May 29, 1984.

These statements from the RMP are straight forward and define a policy compatible with the needs of the minerals industry; local, state, and national requirements; and allows for the protection of

29-1

all other resources under the existing umbrella of the National Environmental Protection Act (NEPA).

Rather than complying with existing Federal laws and policy and BLM policy statements, KRA has chosen to remove lands from mineral entry by defacto withdrawals under the guise of protecting a species or potential species that presently are so endangered that the Arizona Game and Fish sells licenses and tags annually to hunters for their harvest.

It is stated in Appendix 18, page 203, that bighorn sheep is not on the Arizona (or any other) Threatened and Endangered list and that the species is "extremely valuable economically, as well as providing revenue to Mohave County. Hunters annually contribute over \$125,000 for one auctioned and one raffled hunt alone".

29-2

In what way are bighorn sheep valuable to Mohave County? What revenue does it provide? It certainly doesn't provide the \$125,000 annually because those funds and all funds derived from tags, licenses, permits, fees, and fines stay in the coffers of the Arizona Game and Fish. A handful of hunters stay in the county during the limited bighorn hunts and they spend a few dollars here, but probably more across the river in the casino's of Laughlin, Nevada. I am sorry, but based on the reasons offered, I can not see where bighorn are economically valuable to the county.

I do; however, see that they are valuable to the Arizona Game and Fish and through the special interests of individuals within the BLM Kingman office they are blocking out approximately 122,832 acres of high mineral potential Federal lands to protect their bankbook. In fact the recent passage of the Arizona Wilderness Bill withdrew and protected approximately 196,573 acres of desert bighorn habitat in Mohave County. Much of the lands removed for wilderness contained high mineral potential also.

What is the real value of an operating mine located inside of the boundaries of jurisdiction of the Kingman office of the BLM? Cyprus Bagdad Copper has been mining from the Bagdad pit for a number of years. Their total State tax is approximately \$10,000,000 per year. Approximately 60% of this very sizeable tax payment returns to Yavapai County. Keep in mind that the amount stated does not include personal taxes paid by the employees, moneys paid by these same employees and the company to local and other state merchants for supplies or other expenses. The projected mine life, for the Cyprus Bagdad Mine, is 30 years from this date resulting in taxes paid amounting to approximately \$300,000,000. These are real dollars paid to the State and used for schools, road maintenance, State and Municipal community projects, etc.

<sup>1</sup> Information supplied by Phil Blacet, Cyprus Bagdad Copper.

29-3

How much does the Game and Fish give to the State, County, or local political entities for the maintenance or construction, or improvement of community services? Are the people of Yavapai, Coconino, and Mohave counties really getting a fair shake from the BLM by the recommendations of a few wildlife biologists representing their own personal to close off more areas containing the highest mineral potential in the region?

29-4

Arguments will be that the lands are not withdrawn from mineral entry, but rather managed to protect a species not to inhibit the development of minerals resources. Under the preferred alternative certain lands have been list as no surface occupancy. Mining requires surface occupancy. In other areas occupancy is allowed between June 1 and November 30. How many companies can operate their business 6 months of the year and be closed down for 6 months?

The proposals as written represent an injustice to the people of the respective counties and the State as a whole. They further represent a serious abuse of the meaning and intent defined in FLPMA which authorized the "Policy and Procedure Guidelines" used to establish Areas of Critical Environmental Concern.

Are bighorn sheep endangered? No. Are they significantly disturbed by mans activities. It would appear not if you ever worked around a mine in the Black Mountains or visited the park in Boulder City, Nevada.

Speaking of the sheep in and around Hoover Dam and Boulder City, I asked the wildlife personnel in Kingman about the lack of disturbance of these sheep by man and the response was a laugh and comment that those aren't sheep. They have four legs, curly horns, smell like sheep, and act like sheep so somebody must be mistaken.

A study conducted by Southern California Edison and Arizona Public Services during the construction of the Palo Verde to Devers Power line through bighorn sheep habitat concluded that sheep were impacted by mans activity to various degrees, but not uniformly nor necessarily adversely.

I questioned another BLM wildlife specialist about bighorn sheep studies and was informed that the real problem is that no long term studies exist that document the relationship between man and bighorn sheep. When I brought up the sheep at Boulder City, Nevada the comment was "yes they do live around man, but these sheep have been born around man and through time have become adapted to man". Here the lack of a baseline study of the bighorn sheep before the construction of the dam negates the obvious that the sheep live with the occupation of man. Not having hard numbers in front of me I can not state herd size, viability, etc. All I can go by is the obvious this is an example of man and sheep living in very close association and the sheep seem to be proliferating.

I have carried on for a few pages now about your RMP and the miss use of the ACEC to withdraw lands that should be managed under the multiple use policy. I have little basis to say that you are wrong in your assumptions, but on the other hand I see nothing being offered to say that you are correct. To the contrary what I have seen seems to say that you are wrong or at least terribly premature in your decisions.

We just fought a war over oil. Oil that is imported. Imported oil that we as a consumptive society require to maintain our lifestyles. Today we import 50% of all the oil we consume and 100% of other raw minerals that is of utmost importance to our current and future existence. When mining is mentioned the first thing that comes to mind with many is gold. We have enough gold for all the jewelry we could ever want.

I concede, we may have enough gold to make into jewelry, but for those of you that don't know, gold doesn't just go into jewelry. It provides the contact for virtually all of the electrical components used in our every day life. It protects all of our astronauts and satellites and, used as a salt, is a medicine in the treatment of arthritis. Gold has many uses, but its utility is only a fraction of a fraction of the essential uses of other minerals contained in those areas proposed to be "protected" under the umbrella of ACEC. Every facet of modern society has been cut on the back of minerals and societies entire existence depends on a healthy and dependable minerals industry. The efforts to do away with mining in the US are taking their toll, but the ones who will be surprised the most and cry the loudest when the dust settles will be the victors. Mining is doomed if we continue along the path that we are currently on and the RMP proposed by the Kingman Resource Area is just one step along this road.

Enough eulogizing. I have offered my comments based on the facts as I understand them. I hope your decisions are based on fact and not on the personal agendas of a few individuals.

Thank you and your staff for this opportunity to express my concerns. I am sorry that the RMP procedure was not farther along when I left the Bureau, perhaps I could have presented some arguments that could not been blown by as easily as those offered by others.

Thank you once again.

Sincerely,

  
Robert L. Harrison

30

March 18, 1991

Elaine Marquis  
Area Manager, Kingman Resource  
2475 Beverly Avenue  
Kingman, Az. 86401

Dear Elaine,

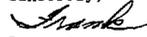
As you know I am very concerned about the Draft Resource Management Plan and if implemented what it will do to my operation on the Music Mountain allotment.

The document is confusing to read and understand its impacts. Would you give me your summarization on the following topics: Access, Range improvements and management, wood cutting and vegetative manipulation, grazing preferences and water quality?

I will have further input.

Thank you for your help.

Sincerely,

  
Frank L. Hunt  
P. O. Box 58  
Peach Springs, Az.  
86434

30-1

271

31

February 26, 1991

Mr. Henry Bisson  
District Manager  
Bureau of Land Management  
Phoenix District  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Mr. Bisson:

As a permittee on the Crozier Canyon Allotment allotment in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, and many other of the proposals will have on my ranching operation, if implemented into a final plan.

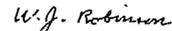
31-1

Could you please summarize any changes which would occur with regards to my ranching operation (i.e. grazing preferences, livestock management, range improvement construction and maintenance, access etc.) if the proposals in the Draft RMP are implemented into the Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Very Truly Yours,



Sandy Naughton  
Executive Vice President  
Arizona Cattle Growers' Association

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

SN:km

CONSULTATION AND COORDINATION

32

Bill Carter  
BLM  
Kingman Resource Area office  
2475 Beverly Ave  
Kingman AZ 86401

Dear Mr. Carter:

I am writing about the draft EIS for the Kingman Resource Area. I feel that protecting the remaining riparian ecosystems is crucial, for not only water, but also <sup>because of</sup> the unique plant and animal species in the region.

I would also like to see Burro Creek protected under the NEPA, EPA, Endangered Species Act, and Clean Water Act guidelines.

I thank you for the time you and your staff have put into recommendations for ACEC. I support preservation and public awareness strongly, especially concerning conflicts with the Cypress Bogdad mining.

Thank you again.

Sincerely,  
Amy A. Kirk

MARCH 15, 1991  
1158 South Alarcos  
Prescott AZ 86301

33

John Gallegher  
341 S. Pleasant St.  
Prescott, AZ 86303  
March 15, 1991

Bill Carter  
BLM  
Kingman Resource Area office  
2475 Beverly Ave.  
Kingman, AZ 86401

Dear Mr. Carter,

I am writing to show my support for your recommendations for Areas of Critical Environmental Concern. I am specifically concerned about protecting our remaining riparian ecosystems. I feel it is tragic that we have lost 90% of Arizona's riparian areas. The remaining riparian areas in this state are home to 2% of our states wildlife. So, it is not surprising, for example, that Burro Creek has the most T&E listings in the state.

Basically, I think our riparian habitats are important, and should be a public concern. Therefore I approved your recommendations, keep up the good work.

Sincerely,  
John Gallegher

34

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
Kingman, Arizona 86401  
Dear Mr. Carter,

I am writing to support the Kingman Draft Resource Area Management Plan. I am especially impressed by your emphasis to protect intact riparian habitat within your area of jurisdiction. The wildlife that is dependent on these stream environments cannot survive without adequate protection of this habitat. The main reason so many listed species of threatened and endangered species occur in riparian ecosystems is because the habitat is endangered as well as the animals that depend on it. With less than 10% of Arizona's riparian ecosystems still intact, it is essential that every effort be made to protect what remains. Your plan gives adequate protection through your recommendations pertaining to ACEC's. The designation will help protect some of the last remaining riparian ecosystems left in Arizona. I commend your position.

Yours truly,  
Rick Alexander

Rick Alexander  
838 Blue Jay Dr.  
Prescott, Arizona 86303

March 17, 1991

35

Bill Carter  
Kingman Resource Area Office  
Bureau of Land Management  
Kingman, AZ 86401

Dear Mr. Carter,

I am writing in regards to the Resource Management Plan for the Kingman Resource Area. I support your recommendations for Areas of Critical Environmental Concern; specifically, Burro Creek, the Big Sandy, Bill Williams, and Santa Maria Rivers.

I feel it is especially important to give the riparian ecosystems of Arizona special protection. With 90% of the state's riparian areas having already been impacted or altered to some degree, it is essential that the remaining vestiges of relatively pristine rivers be preserved. Burro Creek is an exceptionally rich and diverse riparian ecosystem with a number of rare and endangered plant and animal species. I feel strongly that this areas unique biological resources should be given a high degree of protection.

Designating these rivers as ACEC would also be in compliance with the Arizona State mandate, Executive Order 89-16, to protect existing riparian habitat. This mandate should be of special concern to federal agencies and hopefully, influence riparian management policies of public lands within the state.

I support your recommendations for ACEC on the Kingman Resource Area and very much hope that these recommendations will be implemented.

Sincerely,

Kathleen Mitchell

Kathleen Mitchell  
701 Zuni  
Prescott, AZ 86303  
March 15, 1991

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CONSULTATION AND COORDINATION

36



## FRIENDS OF THE OWLS

P.O. Box 11152 • Prescott, Arizona 86304



Bill Carter  
BLM  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, AZ. 86401

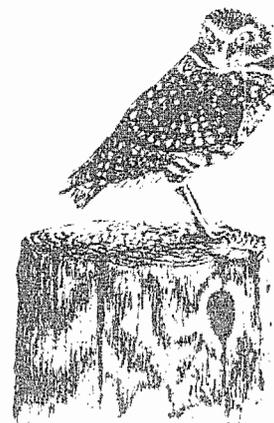
Dear Mr. Carter,

March 15, 1991

Our group applauds the efforts of the BLM to protect some of the important riparian areas in the Kingman Resource Area. By proposing to designate some of these areas Areas of Critical Environmental Concern, your agency has recognized the vital need to protect what little riparian habitat remains in Arizona.

Keep up the good work.

Cordially, *Peter J. Galvin*  
Peter J. Galvin  
Director,  
Friends of the Owls



Douglas Hulmes  
 Professor of Env. Studies  
 Prescott College  
 220 Grove Ave.  
 Prescott, Az. 86301  
 March 13, 1991

Bill Carter  
 BLM  
 Kingman Resource Area Office  
 2475 Beverly Ave.  
 Kingman, Az. 86401

Dear Mr. Carter:

I am writing to provide comments on the draft RMP/EIS for the Kingman Resource Area. I was very impressed by the quality and detail of the document. Specifically I would like to support your recommendations for Areas of Critical Environmental Concern. I have spent a considerable amount of time studying several areas that were recommended and have been designated as wilderness on the Kingman Resource Area. I wrote several reports that were submitted to the Arizona Wilderness Coalition for the Arizona BLM/Wildlife Refuge Wilderness Bill, including: Upper and Lower Burro Creek, the Arrastras, Black Mtn. Ives Peak and Tres Alamos, and the Hassayampa River Canyon. Most of these areas were on the Kingman Resource Area. I am specifically concerned about protecting the last remaining vestiges of riparian ecosystems, and the areas I studied for Wilderness included some of the most significant remaining areas in Western Arizona. This is not only because of the availability of water, but also because of the unique and varied associations of vegetation communities that occur in this region. It is not surprising, for example, that Burro Creek has the most T. & E. listings in the state. This is not only because of the scarcity and loss of riparian ecosystems in Arizona, but because of the unique associations of plants and animals that are found in this area.

The loss of Lower Burro Creek to Protection under the Wilderness Act was truly unfortunate. The arguments expressed by Cypress Bagdad regarding the effects of Wilderness designation, ACEC, or designation of Wild and Scenic status for the Santa Maria River and Burro Creek are very misleading with respect to potential impact on the mine. Cypress Bagdad

will have to maintain environmental standards regardless of designated protection for these areas under the guidelines of NEPA, EPA, the Endangered Species Act, and the Clean Water Act. The recommendations that you have made in the draft Resource Management Plan will not in any way constrain Cypress Bagdad's plans for expansion except for what is already insured by the legislation I have referred to above.

I would also like to point out that your recommendations for ACEC designation of all significant streams within the Kingman Resource Management Area is in compliance with the Governor's Riparian Habitat Task Force; Executive Order 89-16.

"Section 1. In recognition of the critical nature of riparian areas to the State, it is hereby determined that the policy of the State of Arizona shall be:

- (a) To recognize that the protection and restoration of riparian areas are of critical importance to the State;
- (b) To actively encourage and develop management practices that will result in maintenance of existing riparian areas and restoration of degraded riparian areas;
- (c) To promote public awareness through the development of educational programs of the benefits and values of riparian areas and the need for their protection and careful management;
- (d) To seek and support cooperative efforts and local group and citizen involvement in the protection, maintenance and restoration of riparian areas;
- (e) To actively encourage the preservation, maintenance and restoration of instream flows throughout the State;
- (f) That any loss or degradation of riparian areas will be balance by restoration or enhancement of other riparian areas of equal values and functions; and all state agencies shall rigorously enforce their existing authorities to assure riparian protection, maintenance and restoration."

The detail and clarity of your recommendations for ACEC on the Kingman Resource Area is excellent. I applaud you and your staff for your time and expertise, and the willingness to make these very significant recommendations.

Sincerely,

*Douglas Hulmes*

03/20/91 14:32 602 297 1361 GSA RESOURCES 02



P.O. Box 509 Cortaro, Arizona 85652  
(602) 297-4330 Telex 5106001432  
Fax (602) 297-1361

March 20, 1991

Elaine F. Marquis  
Area Manager  
Bureau of Land Management  
Kingman Resource Area  
Kingman, Arizona  
FAX (602) 757-3161

Dear Elaine:

I will be unable to attend the RMP Minerals Meeting at 7:00 P.M in Kingman. I left this morning and a few miles out of Tucson a spring shackle bolt in the rear spring broke, probably as a result of a long trip over the back roads in northern Sonora, Mexico. It only took five minutes to replace the bolt, but it took over two hours to find the high strength grade eight shackle bolt. By then I could not even under the best circumstances get to Kingman in time for the meeting.

I have put together a proposal for mining the saponite deposit in the Arizona Cliff Rose area. It appears to me that creating an ACEC which encompasses the Arizona Cliff area may result in the extinction of the species. In my judgement setting up a cooperative management program with the BLM in which the Arizona Cliff Rose would be planted on the spoil piles from the mining operation could expand its habitat and increase the population.

03/20/91 14:33 602 297 1361 GSA RESOURCES 03

Next month we will be doing the low level air photography that will be used to prepare a 1 in. = 100 ft. scale map with 5 ft. contours. In addition a rectified sensitized mylar overlay will be prepared on which individual Arizona Cliff Rose plants will be visible. Based on this it will be possible to determine the distribution and density of the population.

And finally, the drilling results will be available in April. This will allow us to determine the extent and quality of the saponite. Until we have this data I believe it is premature to establish the Clay Hills ACEC.

I strongly support the proposal made by Cyprus Bagdad Copper Company to eliminate consideration of the Wild and Scenic River Designation up stream from a north-south line drawn through the mid point of section 13. Designations of that portion of Burro Creek upstream from this line would adversely affect mining the East Burro Creek Saponite Deposit which is on State Mineral Leases.

Best regards,  
*Ted H. Eyde*  
Ted H. Eyde

THE/mce

**ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.**

P.O. Drawer 7545 • Phoenix, Arizona 85011  
(602) 957-0773

March 19, 1991

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

Re: Draft Kingman Resource Area Resource Management Plan/Environmental Impact Statement

Dear Mr. Carter:

The Arizona Desert Bighorn Sheep Society, Inc. (ADBSS) has reviewed the above referenced document and would like to offer the following comments. Please accept our comments as part of the official record.

ADBSS is an organization dedicated to the conservation of desert bighorn sheep. The goals of our organization are as follows:

1. Development of water resources for desert bighorn sheep.
2. Reintroduction of desert bighorn sheep into suitable historic ranges.
3. Prevention of encroachment on vital desert bighorn sheep habitat.
4. Promotion of research necessary to understand the needs of desert bighorn sheep.
5. Control of feral burro populations, competition with domestic livestock, and predators where necessary.
6. Assistance to government agencies in desert bighorn sheep population surveys.
7. Promote public awareness of desert bighorn sheep and their problems.

The Draft Kingman Resource Area RMP/EIS addresses most of the items covered by our goal statement. ADBSS will address the Wildlife Habitat Management and Wild and Free Roaming Horse and Burro Management portions of the draft plan.

WILDLIFE HABITAT MANAGEMENT

In general, ADBSS supports the Preferred Alternative for wildlife habitat management.

39-1

The Preferred Alternative states bighorn sheep habitat would be improved and maintained at its optimum potential. It goes on to state monitoring studies would be conducted to determine optimum numbers consistent with habitat potential and other resources. ADBSS questions the terms optimum habitat potential and optimum numbers in reference to bighorn sheep. These terms are not defined anywhere in the document. We do not know what they mean and what implications there are for bighorn sheep management if managers strive for optimum numbers.

We note the BLM's Rangewide Plan for Managing Habitat of Desert Bighorn Sheep on Public Lands, dated 1989, estimates a current population of 1200 bighorn sheep in the Black Mountains. It estimates the potential population at 1500.

Table II-1, Page 33 in the draft plan, shows the bighorn sheep numbers for each habitat area in existing Habitat Management Plans. The Black Mountain and Mount Wilson habitat areas show bighorn population of 600 and 100 respectively. Arizona Game and Fish Department census data for both 1980 and 1989 show a higher number of bighorn in both areas than the numbers proposed by BLM for each habitat area.

There is a wide discrepancy between the potential bighorn population for the Black Mountains in the Rangewide Plan and the proposed population for the Black Mountain HMP area. Although ADBSS supports use of the higher number, we are realistic enough to know wildlife numbers must be managed within habitat potential. We will defer to the judgement of the Arizona Game and Fish Department in determining the best bighorn sheep population level for use in this plan and to guide future management.

ADBSS is pleased to see new waterhole construction, waterhole maintenance and waterhole monitoring emphasized in the RMP/EIS. We agree with limiting detrimental activities in bighorn sheep lambing and rearing grounds during the dates listed.

ADBSS supports the designation of priority desert bighorn habitat as Areas of Critical Environmental Concern (ACECs). We have specific comments about the two ACECs covered by HMPs.

BLACK MOUNTAIN ACEC

1. Objective 6 regarding minimizing conflict between bighorn sheep and other grazing or browsing animals should be elevated to the number 2 ranking to emphasize its importance.
2. Objective 12 discusses developing plant community descriptions for bighorn sheep habitat and including these in AMP and HMP objectives. It further states livestock grazing will be managed to prevent excess utilization. ADBSS feels wild burro grazing should be managed to prevent excess utilization, as well as livestock grazing, and noted accordingly. Desired plant community descriptions for important bighorn sheep habitat should be included in HMAPs, as well as AMPs and HMPs.
3. Objective 13 discusses keeping burro numbers at the management level of 400 specified within the Black Mountain HMAP. ADBSS feels this level should be the absolute maximum upper limit.
4. Objective 14 discusses managing bighorn sheep habitat at its optimum potential. Optimum potential is a term which should be defined. We do not know if this term pertains to desired plant community species composition or to pounds per acre of forage produced by plant species.

39-2

39-3

39-1

AUBREY PEAK BIGHORN SHEEP HABITAT ACEC

1. Objective 5 regarding minimizing conflict between bighorn sheep and other grazing or browsing animals should be elevated to the number 2 ranking to emphasize its importance.
2. Objective 13 discusses developing desired plant community descriptions for bighorn sheep habitat, including them in AMP and HMP objectives, and managing habitat for its optimum bighorn sheep potential. ADBSS feels HMAPs should list desert bighorn sheep habitat desired plant community descriptions also. The term optimum habitat potential for bighorn sheep is not defined in the draft plan. It should be defined in the document.

39-4

WILD AND FREE ROAMING HORSE AND BURRO MANAGEMENT

ADBSS feels the RMP/EIS process is an important step in the future management direction of wild burros in the Kingman Resource Area. Up to now, Herd Management Area Plans (HMAPs) and Management Framework Plans (MFPs) have been the guidance documents. With the RMP/EIS process you are obligated to consider the environmental consequences of your burro management actions. We feel there has not been an adequate evaluation of these consequences in the past.

39-5

Table III-10, Page 117, lists the present wild burro population in the Black Mountain Herd Management Area at 500. This is suppose to be 100 head above the management level of 400. ADBSS disagrees with the BLM's population estimate. Based upon yearly Arizona Game and Fish Department bighorn sheep helicopter surveys, and the burro observations made during those surveys, we feel a more accurate burro population estimate is in the range of 884 to 1,100 animals. Because the BLM drastically underestimates the burro population, we do not feel its removal efforts are successful in maintaining the Black Mountain herd at 400 animals.

Burro population monitoring consisting of the helicopter mark-recount method conducted every five years (Table 11-13, Page 89) does not appear adequate. Methodology and frequency of burro surveys needs to be changed to provide a more accurate population estimate. ADBSS recommends concurrent helicopter surveys with the Game and Fish Department and for National Park Service. Since BLM relies on the Arizona Game and Fish Department for desert bighorn sheep total population estimates on an annual basis, we see no reason why the BLM cannot accept the same quality of information on burros.

Even though the Wild Horse and Burro Act passed Congress by an overwhelming margin that does not necessarily mean it is good legislation. ADBSS questions if there is a legitimate place for wild burros on western rangeland, and more importantly, in desert bighorn sheep habitat. We are realistic enough to know the law may never be significantly amended or even repealed. If wild burros must persist in the Kingman Resource Area we are adamant they be reduced to the management levels specified in BLM planning documents and maintained at those levels.

39-6

ADBSS supports the Preferred Alternative for Wild Horse and Burro Management which reserves increased forage resulting from improved habitat conditions for bighorn sheep and other wildlife.

ADBSS does not feel the impacts of wild burros as grazing and browsing animals on other resources are adequately recognized in BLM activity plans. In order to correct this situation, we recommend burro impacts be included as follows:

Chapter 1. Management Concern 7. Watershed Protection and Enhancement-Planning criteria. Page 10. Correlate burro grazing, as well as intensive grazing management and watershed productivity. Consider improving watershed condition and trend as a goal in HMAPs, as well as AMPs.

39-7

Chapter 2. Soil Resources. Page 19. Address stabilizing runoff and erosion rates in HMAPs, as well as AMPs.

39-8

Chapter 2. Wildlife Habitat Management. Big Game. Page 33. ADBSS reemphasizes the absolute necessity of managing burros at the lowest possible number under existing HMAPs in accordance with the Rangewide Plan for Desert Bighorn Sheep.

39-9

Chapter 2. Riparian Area Management. Plan actions. Page 35. Management objectives and actions involving riparian/wetland areas should be included in HMAPs, as well as AMPs, HMPs, and RAMPs.

Thank you for the opportunity to comment on your Draft RMP/EIS.

Sincerely,

*Louis Coor*

Louis Coor, President  
Arizona Desert Bighorn Sheep Society, Inc.

LC/gr



40

BILL CARTER  
BLM  
KINGMAN RESOURCE AREA OFFICE  
2475 BEVERLY AVE.  
KINGMAN, AZ, 86401

THOMAS CROSSLIN  
STUDENT  
EMBRY-RIDDLE  
AERONAUTICAL  
UNIVERSITY  
BOX 7825  
PRESCOTT, AZ 86301

I am writing in regards to the draft RMP/EIS for the Kingman Resource Area. Arizona riparian areas are of the utmost concern to me. In Arizona water is the lifeblood and it is therefore very important to protect these areas. Arizona has a history of abusing its riparian areas with 90% of the states riparian areas having sustained some sort of abuse. I would like to recommend that all of the riparian areas in the Kingman Resource Area be designated as Areas of Critical Environmental Concern, in accordance with the Governor's Riparian Habitat Task Force; Executive Order 89-16. I would specifically like to mention the lower burro creek area.

Thank you for your time.

Thomas W. Crosslin

41

March 17, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a permittee on the 2475 Beverly Ave. allotment in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, and many other of the proposals will have on my ranching operation, if implemented into a final plan.

4-1

Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, access, etc.) if the proposals in the Draft RMP are implemented into the Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Very truly yours,

*Elaine Marquis*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

APR 1 1991  
BLM

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CONSULTATION AND COORDINATION

42

Karen Dismukes  
524 Dameron Drive  
Prescott, Az. 86301  
March 14, 1991

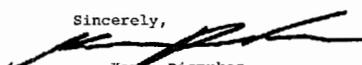
Bill Carter  
BLM  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, Az. 86401

Dear Mr. Carter:

I am writing in concern on the draft RMP/EIS for the Kingman Resource Area. Having spent much time in Arizona's riparian areas I feel strongly about the protection of these areas. Riparian areas are of great importance to the state of Arizona, and need to be protected. Not only are riparian areas an important water supply but they support a large variety of vegetation.

I strongly encourage maintenance and preservation of riparian areas throughout the state. Thank you for your time and please consider active protection of these areas.

Sincerely,



Karen Dismukes

280

43

March 23, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a permittee on the *DCSC HUBBARD RAK* allotment in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

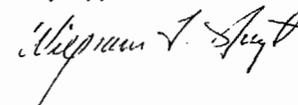
I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, and many other of the proposals will have on my ranching operation, if implemented into a final plan.

43-1 | Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, access, etc.) if the proposals in the Draft RMP are implemented into the Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Very truly yours,



cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

44

March 25, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

I am a resident in the Kingman Resource Area and I have some concerns about the Draft Resource Management Plan prepared to analyze the alternatives for managing the public lands.

I want to point out that I am concerned about the effect that this document is going to have on taxpayers and livestock operations, both on public and private lands. As developed the designation of ACEC's wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and the Alternatives developed, especially numbers 2 and 3 would have dramatic impacts on multiple uses and users in our area.

I recommend that current management options be followed as detailed in Alternative Number 1. As indicated, I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Sincerely,

*Thomas B. Z. Stovall*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

281

45

March , 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a permittee on the Yellow River allotment in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, and many other of the proposals will have on my ranching operation, if implemented into a final plan.

45-1

Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, access, etc.) if the proposals in the Draft RMP are implemented into the Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Very truly yours,

*Abraham Ezra Co*  
*San Francisco Land & Cattle Co*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

CONSULTATION AND COORDINATION

46

March 18, 1991

Mt. Henry Bisson  
District Manager  
Bureau of Land Management  
Phoenix District  
2015 W. Deer Valley Rd.  
Phoenix, Az 85027

Dear Mr. Bisson;

My name is Dave Knisely, and I hold the lease on Mt. Tipton Allotment. As you know my allotment is involved quite extensively in the Kingman Resource Area Resource Management Plan and Environmental Impact Statement. Especially in the area of the proposed RMA and The Wilderness Area. I find that by backing any of the alternatives, I would be backing a lot of issues I don't agree with or don't understand. I feel more comfortable standing with the comments submitted by the Mohave Livestock Association.

I might add that in reading the RMP/EIS, it is very hard to follow. I would appreciate a summary in writing of any changes that will or might occur in my cow-calf operation. Such as grazing preferences, range improvements, livestock management and access, if the proposals in the draft RMP are implemented in the the final RMP.

Thank you for your help in clarifying the impacts these proposals will have on my cow-calf operation.

Thank you,

Dave Knisely  
P.O.Box 455  
Dolan Springs, Az. 86441  
602/767-3887

47

March 22, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a rancher on the Cofer Ranch in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, ORV's, and many other of the proposals will have on my ranching operation, if implemented into a final plan. I want to point out that I am concerned about the effect that this document is going to also have on taxpayers and livestock operations, both on public lands as well as private lands.

I recommend that current management options be followed as detailed in Alternative I. I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, access, ect.) if the proposals in the Draft RMP are implemented into Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Sincerely,

  
Clinton C. Cofer  
Cofer Ranch  
H C 30 BOX 230  
Kingman, AZ 86401

48

March , 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

I am a resident in the Kingman Resource Area and I have some concerns about the Draft Resource Management Plan prepared to analyze the alternatives for managing the public lands.

I want to point out that I am concerned about the effect that this document is going to have on taxpayers and livestock operations, both on public and private lands. As developed the designation of ACEC's wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and the Alternatives developed, especially numbers 2 and 3 would have dramatic impacts on multiple uses and users in our area.

I recommend that current management options be followed as detailed in Alternative Number 1. As indicated, I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Sincerely,



cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

49

March , 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

I am a resident in the Kingman Resource Area and I have some concerns about the Draft Resource Management Plan prepared to analyze the alternatives for managing the public lands.

I want to point out that I am concerned about the effect that this document is going to have on taxpayers and livestock operations, both on public and private lands. As developed the designation of ACEC's wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and the Alternatives developed, especially numbers 2 and 3 would have dramatic impacts on multiple uses and users in our area.

I recommend that current management options be followed as detailed in Alternative Number 1. As indicated, I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Sincerely,



cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

283

50

March 22, 1991

Ms. Elaine Marquis Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a rancher on the Cofer Ranch in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and many other of the proposals will have on my ranching operation, if implemented into a final plan. I want to point out that I am concerned about the effect that this document is going to also have on taxpayers and livestock operations, both on public lands as well as private lands.

I recommend that current management options be followed as detailed in Alternative 1. I feel the other Alternatives would greatly restrict the use of the public lands in our area.

50-1

Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, etc.) if the proposals in the draft RMP are implemented in the final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Sincerely,  
*Ken McReynolds*  
Ken McReynolds  
Cofer Ranch  
H. C. 30 Box 230  
Kingman, AZ 86401

51

March , 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

I am a resident in the Kingman Resource Area and I have some concerns about the Draft Resource Management Plan prepared to analyze the alternatives for managing the public lands.

I want to point out that I am concerned about the effect that this document is going to have on taxpayers and livestock operations, both on public and private lands. As developed the designation of ACEC's wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and the Alternatives developed, especially numbers 2 and 3 would have dramatic impacts on multiple uses and users in our area.

I recommend that current management options be followed as detailed in Alternative Number 1. As indicated, I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Sincerely,

*Ken McReynolds*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

March , 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

I am a resident in the Kingman Resource Area and I have some concerns about the Draft Resource Management Plan prepared to analyze the alternatives for managing the public lands.

I want to point out that I am concerned about the effect that this document is going to have on taxpayers and livestock operations, both on public and private lands. As developed the designation of ACEC's wildlife habitat, riparian management, access, water quality, endangered species management, ORV's and the Alternatives developed, especially numbers 2 and 3 would have dramatic impacts on multiple uses and users in our area.

I recommend that current management options be followed as detailed in Alternative Number 1. As indicated, I feel the other Alternatives would greatly restrict the use of the public lands in our area.

Sincerely,

*Cristi McReynolds*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401



53

Mohave Livestock Association  
P.O. Box 6578  
Kingman, Arizona 86401

WRITTEN Comments on DRAFT of  
Kingman Resource Area Resource  
Management Plan and Environmental  
Impact Statement

Page 16 - Resource Area Goals ( 2nd item from top left)

Manage Livestock Pollution from Rangelands.

Comment. We assume this reference to best Management practices is in regard to the State Law regarding water quality. It is our understanding that the definition of best management practices is being debated and this issue is not yet resolved. We believe this to be a State of Arizona matter and is not a goal for the Bureau of Land Management..

How can you have a goal for something that is not yet established? It should be deleted from the rmp.

53-1

Page 16 - General Management Areas / Areas Requiring Special Management, (right-hand column)

Comment.. We agree that some areas may require special management, however, we do disagree with the size, scope, and need for some of the areas.

Page 19 - Water Rights, (bottom of right column)

Comments. We question the need for the BLM to file for water rights. At a minimum, the document should state that such filings are subject to valid existing rights.

Page 21- Recreation Management.

When did the BLM become involved with NATIONAL PARK SERVICE to develop ,camping, picnicing,<sup>4</sup> wheeling recreation areas.?

Page 23 - Special Status Species Management.

Comments. When will there be enough data on the desert tortoise. And what strategies will be implemented?? How do you manage a desert tortoise??

Page 24 - Riparian Area Management,(last paragraph)

Comments. It is unclear whether the decision in the two riparian plans are incorporated by reference or whether they have been actually written into this document. If by reference, we must object because we do not know what these decisions are or how they will affect livestock grazing. On page 1, it is stated that the decisions made on the two grazing EIS,s are adopted as the management direction for livestock grazing. If the riparian decisions conflict with livestock management decision in the grazing EIS, then we assume the Grazing Decision will supercede.

53-2

Page 25 - Prescribed Fire.

Comment. We strongly support the use of prescribed fire. However we urge the BLM to consider all options available to reduce costs associated with these fires.

53-3

Page 26 - Public Land Exchange

Comment. State land exchanges should be deleted from the RMP because voters of Arizona said no to state exchanges.

Page 30 - Alternative 1, Vegetative Products.

Comment. We support the present policy for support of vegetative products, especially the private and commercial woodcutting activities as this supplies a local demand and relieves cutting pressure elsewhere. We do encourage the BLM to more strictly enforce the present stipulations for the private woodcutting areas.

Page 30 - Alternative 1, Rangeland Management.

Comment. We wish to see the continuation of the co-operative effort between the BLM and the Livestock industry following the completion of the two livestock grazing impact statements, and therefore, support Alternative 1 in regard to rangeland management.

Page 31 - Rangeland Management,

Comment. A total of 165,872 acres of public land at the south end of the Black Mountains would remain closed to livestock grazing to reserve forage for wildlife.

Why is this land not in multiple use?

Page 31 & 47 - OFF ROAD VEHICLES MAP 2-3

This does not take into consideration intermingled BLM lands or STATE and PRIVATE lands, and should show STATE and PRIVATE as such, that both have limited access in shaded(gray) areas.

Page 33 - WILDLIFE HABITAT MANAGEMENT

\*20 mile buffer of Bighorn Sheep habitat...

Would this not conflict with the multiple use of Public Lands?

What does this do to individuals in these areas that free roam their domestic sheep and goats ??

Page 34 - Alternative 1, Haulapai Mexican Vole  
(1st column, 6th paragraph)

comment: We recommend recovery planning be closely coordinated with the livestock grazing permittee to assure his input on the effect to his operation is considered.

Page 34- Riparian Area Management (bottom 2cd column)

comment: We support the proper management of riparian areas as accomplished through the Allotment Management Plan Program on the Brimhall's Burro Creek Allotment. We do have a problem visualizing 432.9 miles of riparian as shown in Appendix 7. With this in mind, we recommend that each grazing permittee be individually contacted for input into the RACE inventory which will be so crucial to his/her operation.

Page 34- Riparian Area Management

comment: Would like to know what the BLM's management plan will be before the book is finished.

Page 35- Special Management Areas (2nd column)

comment: Although Alternative 1 would not designate special management areas, we do not believe it is correct to state that 'all areas would continue to receive nearly equal management attention.' For example, consider the categorization process in the BLM Allotment Management Plan Program. This results in many areas receiving more 'management attention' than others. We believe the BLM does give special attention to particular areas and resources in their current program and rightly so.

53-4

Page 35- Wild Horse and Burro Management

comment: Allocation for forage for all species, domestic and wild, is inherent in the BLM's monitoring program. Utilization measures do not distinguish which animal is responsible, and numbers may be adjusted accordingly as laid out in the two grazing EIS's and subsequent decisions. The initial numbers of horses present at the passage of the Wild Horse and Burro Act was established by the BLM as 14 head in the previous planning document. We believe the 14 head plus a reasonable natural increase of the population is the wild horse number which should be established. In arriving at this number, the poor condition of the original 14 head, predation, ect., should be considered.

Page 35- Wild Horse and Burro Management (continued)

53-5

comment: We believe that a herd of 90 head or 130 head of wild horses or burros would be an unreasonable increase in the Cerbat HMAP, -- as referenced by page 24 & 25.... PUBLIC LAW 92-195, Dec 15, 1971 (USC 1331-1340 as amended)

Horses and Burros on public land are maintained at the lowest level needed to assure the herds FREE roaming character, health, and self-sustaining ability.

\*\* If this is Law, we find comments on page 59- Wild Horse and Burro Management to be incorrect and should be deleted from RMP :: (lower left paragraph bottom column)

" If the use limits are exceeded after the population LIMITS of 90 horses has been reached, livestock and deer numbers would be reduced."

We do not feel this would be considered multiple use.

Page 35- Alternative 2, Land Ownership Adjustments (column 1, 3rd paragraph from bottom)

53-6

comment: When compared to map II-4, proposed disposal land in T22 & T23N, R18W, appear to be within the Cerbat Herd Management Area and disposal would conflict with buffer zone requirements for the HMA. We recommend the land be retained.

53-7

Also, land proposed for disposal in the following areas are part of existing or proposed for Allotment Management Plans and should be retained in public ownership to assure adequate land base to continue these livestock programs as outlined the Grazing EIS's:

Page 35- Alternative 2, Land Ownership Adjustments- Cont.

T22N, R19W, Sec. 2 and 10

T23N, R19W, ALL

T22N, R18W, Sec 2 and 3

T23N, R18W, ALL

T24N, R19W, ALL

T25N, R20W, ALL

T26N, R15W, ALL

T26N, R16W, ALL

T25N, R15W, ALL

T25N, R16W, ALL

T24N, R14W, ALL

T14N, R17W, ALL

T15N, R16W, ALL

T15N, R17W, ALL

T16N, R17W, ALL

T16N, R17W, ALL

T17N, R17W, ALL

Page 42- Alternative 2, Watershed (column 1, 5th para.  
from top)

"all grazing allotments are categorized according to current and potential watershed condition, as shown in Appendix 20. This categorization would be validated in the field."

comment: If as stated this categorization needs to be validated in the field, we would assume the information in Appendix 20 is not previously validated by professional standards and therefore this appendix should be deleted or as a minimum, footnoted to be professional judgement only.

Page 42- Alternative 2, Vegetative Products  
(2cd column, 4th paragraph from top)

'grazing would be strictly controlled to maximize reproduction and regeneration of timber stands.'

53-8

comment: What does this Mean?? Allotment Management Planning should provide for the needs of all vegetative species. To our knowledge, reproduction of Ponderosa Pine is not a problem in pine areas at the present time. This sentence should be deleted.

Page 42- Alternative 2, Vegetative Products  
(2cd column, 5th paragraph)

'Percent slope less than 15 percent'

comment: Too specific for a document of this type. Exact percentages should be specified on a case-by-case basis in the management plan noted in the sixth paragraph.

Page 43 - Alternative 2, Rangeland Management  
(column 1, 4th paragraph)

'This alternative would be the same as Alternative 1, except for the following:'

comment: Our comment is the same as Alternative 1, except for the following:

Page 43- Alternative 2, Rangeland Management

comment: (see above) It is our opinion that Allotment Planning Procedures already in effect as the rangeland management program are more than adequate to accommodate any special needs in the proposed Areas of Critical Environmental Concern. We will cover this specifically in our comments regarding Appendix 18, pages 201-219.

Page 43- Alternative 2, Rangeland Management  
(1st column, 8th paragraph)

'Upon completion....be reclassified.'

comment: Ephemeral Designations were proposed, acted upon, and, to the best of our knowledge, completed as a part of the Bureau's previous planning effort. Any effort to change the designations now is unnecessary and perhaps unlawful. By the BLM's own regulations, the Special Rule adopted in 1968 (then 43CFR4115.2-4) is the guide from which Ephemeral Range is determined. Since the criteria in the Special Rule is very specific and was previously applied regarding elevation, precipitation isoline, and the minor percentage of desirable

53-9

Page 43 Alternative 2, Rangeland Management--(Cont.)

perennial forage plants, it is difficult to comprehend how new inventory data could change the designations.

We strongly feel that this matter has already been adjudicated and recommend this proposal be dropped.

Page 43- Alternative 2, OHV Designation

comment: Same comments are made here as an Alternative 1 OFF ROAD VEHICLES on pages 31 and 47, of this document.

Page 47- Alternative 2, Wild and Scenic Rivers

comment: We cannot visualize Wright Creek, Burro Creek, or Francis Creek to be Wild or Scenic Rivers. The eligibility criteria does not appear to be in the document. We recommend that each grazing permittee be individually contacted for input into the eligibility determination as it affects his/her allotment.

53-10

Page 47- Wildlife Habitat Management (2nd column, 4th para.)

'Special management ..... management goals.'

comment: We question whether special management areas would provide tools to achieve management goals. The best tool for wildlife habitat improvement is the Allotment Management Plan Program already in effect.

Page 50- Alternative 2, Riparian Area Management

comment: Same comments as given for Alternative 1 or as stated on pages 24 and 34.

Page 59- Alternative 2, Wild Horse and Burro Management

comment: Same comment as given for Alternative 1.

Page 60- Alternative 3, Lands (1st column para. 4 & 5)

comment: Same comment as given for Alternative 2 regarding retaining land proposed for disposal within Allotment Management Plan Areas. Same lists of lands to be retained is incorporated by reference plus the following from Map II-10:

T22N, R18W, ALL

In particular, we vigorously object to this particular disposal area because it includes the Curtain Allotment which has been intensively managed Holistically including co-operation a co-ordination between the livestock industry, Arizona Game and Fish, the State Land Department, the Bureau of Land Management, and the local populace. The information and experience gained here has the potential for beneficial use on a large scale. It makes no logical sense to dispose of this land to private or State control. Although it might be argued that the State would continue to lease the land for grazing, this is certainly no guarantee as the State's primary function is to provide dollars for the schools. And these particular parcels are well situated for commercial development.

Page 60- Alternative 3, Lands (continued.)

Long-term use for grazing, recreation, wildlife habitat, and watershed protection is best met if these lands are retained in Federal ownership.

Page 60- Alternative 3, Vegetative Products

comments: Same comment given for Alternative 2. In addition, we wish to emphasize the demand for commercial and private woodcutting and the need to supply this demand. Woodcutters are perhaps the BLM's largest constituency in terms of numbers of users. We feel the benefits to the rangeland in clearing of Pinyon-Juniper and the subsequent mosaic of grass, shrubs, and Pinyon-Juniper that will result, far outweighs any short-term negative impacts that may occur.

Page 78- Wild Horse and Burro Management- Alternative 3

comment: If Wild Horse population is reduced to 14 animals the remaining horses would be managed until they become extinct. What kind of Management is this?????

DD. Page 60 - Alternative 3, Rangeland Management  
(2nd column, top of page)

'Same as . . . Habitat ACEC's.'

COMMENT: The elimination of livestock grazing is not carried forward in Table II-8 or Appendix 18, regarding the McCracken and Poachie ACEC's. Therefore, it is difficult to know exactly what is being proposed and to what extent. We strenuously object to any elimination of livestock grazing in these areas especially when Table II-5 list both as being excellent habitat for desert tortoise at the present time. Tortoise and livestock must be thriving together for this to be true.

EE. Page 76 - Alternative 3, OHV Designations

COMMENT: Same comment as given for Alternatives 1 and 2.

FF. Page 78 - Alternative 3, Wildlife Habit Management

COMMENT: Same comment as given for Page 60, Alternative 3, Rangeland Management.

GG. Page 78 - Alternative 3, Riparian Area Management  
(column 1)

COMMENT: Same comment as given for Alternative 1.

HH. Page 78 - Alternative 3, Special Management Areas

COMMENT: The size and scope is preferable to Alternative 2 but still questionable. See Comments on Appendix 18.

II. Page 78 - Alternative 3, Wild Horse and Burro Management  
(column 2, bottom of page)

COMMENT: Same comment as given for Alternative 1.

JJ. Pages 201-219 - Appendix 18, Areas of Critical Environmental Concern (ACEC)

COMMENT: This comment addresses ACEC's in general as they apply to this document. Section 103(a) of Public Law 94-579 defines Areas of Critical Environmental Concern as 'areas 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 natural hazards.'

The key phrase is 'to protect and prevent irreparable damage.'

The majority of the ACEC's proposed in Alternatives 2 and 3 do not meet the criteria of this definition. We believe existing policy of the BLM along with the multitude of Laws and Regulations for the public land are more than adequate for the BLM to continue the fine job it is already doing. In particular, the ACEC's proposal for Riparian and Wildlife Habitat protection certainly does not appear to be in danger of irreparable damage. Mining is currently regulated through Mining Notices and Mining Plans of Operation, Livestock Grazing is regulated and managed through the AMP program, Wildlife Habitat is managed through Habitat Management Plans, etc. Wherein lies the threat of irreparable damage. Any damage to vegetation, ~~except perhaps to an endangered species~~, is repairable. For example, the 1978-79 Floods in Burro Creek totally removed all vegetation to bare rock. Now through the Allotment Management Plan and a co-operative mother nature, the Riparian Zone has regrown to such an extent that the rancher received the BLM's highest award for Riparian Management.

We believe ACEC designations should be limited as the law requires to areas where irreparable damage is likely. Some that might qualify would be localized site specific cultural areas or localized site specific habitat for species on the endangered list. Our comments on each ACEC Area follow.

KK. Page 202 - Appendix 18, Alternative 2, Black Mountains ACEC

COMMENT: None of the resources in this area appear to subject to irreparable damage. Wildlife habitat is already supporting one of the best and largest <sup>Thruway</sup> populations of Desert Bighorn Sheep in existence and Allotment Management planning can provide for the Cerbat-Beardtongue. Sensitive cultural resources should be considered for site specific protection, perhaps a small localized ACEC. Objectives and management prescriptions for this proposed ACEC are already being met or can be accomplished through current management. We recommend this area be dropped from consideration as an ACEC.

LL. Page 204 - Appendix 18, Alternative 2, Western Bajada Tortoise and Cultural ACEC

COMMENT: Because of the possible human impact close to a highly populated area, irreparable damage is possible to cultural sites and the tortoise themselves and therefore we recommend this area be designated ACEC.

MM. Page 206 - Appendix 18, Alternative 2, Wright and Cottonwood Creek ACEC

COMMENT: None of the resources in this area appear to be subject to irreparable damage. Riparian improvement to excellent condition undeniably can be accomplished under the Allotment Management Plan Program. This is proven in Burro Creek. No site specific cultural sites we identified, and if they exist or are found could be protected with a small localized ACEC. Objectives and management prescriptions for this proposed ACEC are already being met or can be accomplished through current management. We recommend this area be dropped from consideration as an ACEC.

NN. Page 207 - Appendix 18, Alternative 2, Cherokee Point Antelope Habitat ACEC

COMMENT: The document states that "the habitat is in extremely poor condition, and the longterm viability of the antelope population is questionable without immediate intensive management actions." "Species diversity within the grassland ecosystem will be lost without immediate management" and "the area has been historically grazed by too many livestock, resulting in the poor condition of the range."

We believe these statements lack the backup of substantiated scientific study and should be removed from the document. We do know the Cerbat/Black Mountain EIS document did not classify range condition due to lack of data and to the best of our knowledge, the BLM has not made a determination of range condition through vegetation studies since that time. We do know the BLM has considerable trend data since that time which shows considerable species diversity and an approximately static trend. Both the antelope and the vegetation species have maintained themselves for many years and no doubt would for years to come. This is not to say vegetation production could not be increased, but this can be managed through the AMP program.

Objectives and management prescriptions for this proposed ACEC are already being met or can be accomplished through current management. We recommend this area be dropped from consideration as an ACEC.

00. Page 208 - Appendix 18, Alternative 2, Hualapai Mexican Vole Research Natural Area ACEC

COMMENT: Item ten under management prescriptions excludes livestock from occupied and historic vole habitat. We question whether livestock use is totally incompatible with vole habitat, however, if the exclusion is in the form of fence enclosure, then it is recommended that any water inside the enclosure be piped outside for livestock use. Also, we assume the occupied and historic vole habitat is within the boundaries of the proposed 3,300 acre ACEC. If it is outside, then we would have additional concerns.

PP. Page 209 - Appendix 18, Alternative 2, White-Margined Penstemon Reserve ACEC

COMMENT: No comment/or recommend elimination??

Page 116- MAP III -6 Desert Tortoise Habitat Categories  
Being the following lands are Private and State owned and or leased areas they should be deleted from the RMP.  
T20N, R13W - Cofer Ranch  
T19N, R13W - Windmill Ranch

Page 210- Carrow-Stephens Ranches ACEC

Comment: We as taxpayers and ELM leasees strongly disagree with this being approved, because of the monies it would take to build and operate such an extravagance.

RR. Page 210 - Appendix 18, Alternative 2, McCracken Desert Tortoise Habitat ACEC

COMMENT: The document lists no data that shows tortoise habitat ~~is~~ in danger of irreparable damage with what is needed to meet the definition of an ACEC. The text states "the desert TORTOISE HAS existed for thousands of years and now is said by some to face the threat of extinction" We believe that statement says it all. It is said by some but that doesn't make it a fact. The Mojave population listed as endangered to the west of the Colorado River is infected by an upper respiratory disease and is apparently suffering from concentrated predation by ravens. We assume that was the reason it was listed as endangered and we also assume it will be delisted as soon as these two problems are solved. These are not problems on this side of the river. The objectives and management prescriptions for this proposed ACEC are already being met or can be accomplished through current management. And because of the absence of current or imminent impending irreparable damage to tortoise habitat we strongly oppose this designation.

SS. Page 211, Appendix 18, Alternative 2, Poachie Desert Tortoise Habitat ACEC  
Page 212, " " " " " Aubrey Peak Bighorn ACEC  
Page 213, " " " " " Burro Creek Riparian & Cultural ACEC  
Page 216, " " " " " Three Rivers ACEC

Comment: The objectives and management prescriptions for these three proposed ACECs are already being met or can be accomplished through current management. We recommend these be dropped for consideration as ACECs.

Comment Summary for Alternatives:

We appreciate the opportunity to comment and give input into the Kingman Resource Area, Resource Management Plan and Environmental Impact Statement. Livestock grazing is one of the most important and earliest commercial uses of the public lands.

The grazing animal performs a vital function in maintaining a healthy rangeland environment.

We in the livestock industry, as represented by members of the Mohave Livestock Association, would like to see that this cooperation continues through the 1990's and into the 21st Century.

Although the two livestock grazing EIS documents and the livestock grazing programs developed from them have been incorporated into the new Resource Management Plan by reference, We are concerned that many actions proposed in the RMP would adversely affect individual grazing permits, and perhaps change the cooperative situation to an adversarial one.

Further concerns regarding the exclusionary trends in the document regarding areas of critical environmental concern, riparian areas, and special status species.

It appears the way some of these sections are worded that livestock grazing could be eliminated or severely restricted in such a manner that would be contrary to the approved livestock grazing program developed as a result of the two grazing EIS.

With all of this in mind we feel that Alternative I with a few word changes would be the preferred Alternative.

Sincerely,  
*Ken McReynolds*  
Ken McReynolds  
President:  
Mohave Livestock Association

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MOHAVE LIVESTOCK ASSOCIATION

XXXXXXXXXXXXXXXXXXXX P.O. Box 6578  
Kingman, Arizona 86401  
Phone: (602) 753-3788

April 15, 1991

Ms. Elaine Marquis  
Area District Manager  
Bureau of Land Management  
2475 Beverly Lane  
Kingman, AZ 86401

Dear Ms. Marquis:

Please include the attached comments to the ones already submitted  
by the the Mohave Livestock Association.

Thank you.

Sincerely,

*Ken McReynolds*  
Ken McReynolds  
President

KMcR/vac  
enclosures(3)

VV. Comments on Chapter IV-Environmental Consequences

We feel the impact analysis for Alternative 1, Current Management, is flawed and should be redone.

The analysis does not accurately reflect all components of Alternative 1 ~~and~~ by neglecting to identify the beneficial effects of implementing the program decisions for the two Grazing EIS's within the five-year time frame ~~planned~~ or in the future.

If the schedule of implementation had been met, or whenever it is met, many of the supposed adverse impacts identified as a part of "current management" would be non-existent. It appears an attempt is made to downplay current management even though if implemented it would solve many of the resource conflicts identified.

Examples:

WW. Page 123: 3rd paragraph - "Wild horse numbers in excess of the carrying capacity would degrade watershed condition"

COMMENT: Aside from questioning if watershed conditions are deteriorated under current management, which we believe they are not, had the Herd Management Plan discussed on Page 8 of the Program Document for the Cerbat/Black Mountain EIS been implemented on schedule in 1983, this identified adverse impact would not exist. It was not implemented, yet even so, the beneficial impact should be identified because the grazing program resulting from the EIS is part and parcel to Alternative 1. (See Pages 1, 20, 30, and 157 of Draft RMP)

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CONSULTATION AND COORDINATION

XX. Page 127 (7th Paragraph, 2nd Column)

'Existing priorities do not . . . declines in habitat conditions''

Page 128 (3rd Paragraph, 1st Column)

'Under current management wild horses would be allowed to increase or decline on their own''

Page 129 (2nd Paragraph, 1st Column)

'Existing rangeland program priorities . . . further declines in condition''

Page 129 (9th Paragraph, 1st Column)

'BIM has . . . decline of this species''

Page 130 (1st Paragraph, 1st Column)

'Existing rangeland program priorities . . . decline in riparian condition''

Page 130 (2nd Paragraph, 2nd Column)

'Allowing a population of wild horses to remain unchecked would harm the population itself''

COMMENT: The above examples clearly identify adverse impacts from the viewpoint that current management does not include the livestock grazing program implemented subsequent to the two grazing EIS's. This is of course incorrect as the grazing programs so indicated are part and parcel to Alternative 1, as previously discussed. The fact that they have not been fully implemented does not relieve the responsibility of the Bureau to identify the current or future beneficial impacts of this program as a part of Alternative 1. Once this is done, Alternative 1 should surface as the preferred Alternative, especially from a

vegetation management standpoint. All renewable resources obtain their basic needs from vegetation and the Bureau in the Kingman Resource Area already has an excellent program in place to maximize this resource for all resource uses. That program is the Livestock Grazing Program outlined in the program document for the two EIS's. This fact should be recognized in the RMP.

Pacific  
Turbine Systems



March 28, 1991

10 Lombard Street  
Suite 410  
San Francisco  
California  
94111

U. S. Department of Interior  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Attention: Ms. Elaine Marquis  
Area Manager

Reference: Draft RMP/EIS Comments  
100 MW Hydroelectric Pumped Storage Project

Dear Ms. Marquis:

The comments provided herein are made in reference to the Kingman Resource Area Draft Resource Management Plan and Environmental Impact Statement dated November 1990.

Pacific Turbine Systems, Inc. represents Citizens Utilities—the local electric utility serving Kingman and the majority of the Mohave County area. After extensive study, Citizens has concluded that a 100 MW modular hydroelectric pumped storage project would best serve the growing electrical needs in this area. Due to the project's unique characteristics to both store energy and regulate load (i.e., the project operates analogous to a battery), it will be a valuable energy resource to optimize and enhance the electric system in the Mohave County area, thereby helping to ensure competitive electric rates for consumers.

The project utilizes clean hydroelectric technology and is environmentally kind, especially when compared with the thermal plant alternatives. Unlike fossil-fired (oil/gas/coal) thermal plants, this project has no local air quality impacts nor wastes of any kind. Without the availability of pumped storage as a future electric resource, it is likely that one or more thermal plants would be built instead, with potentially substantial negative environmental impacts to the local area.

The hydroelectric pumped storage project will require roughly 140 acres of land to construct an underground powerhouse and two small reservoirs, impounding

Telephone  
415.362.0622

Facsimile  
415.362.0196

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Bureau of Land Management  
Kingman Resource Area  
March 28, 1991  
Page Two

roughly 2000 acre-feet of water. The project will operate primarily with groundwater. A 230 KV transmission system will also be built to the Hilltop Substation in Kingman. The project is scheduled to be completed as early as April 1995.

This project will provide substantial local economic benefits to Kingman and Mohave County in the form of jobs and services, expected to total more than \$40 million during the construction phase alone.

Two project sites have been selected near Kingman in the surrounding mountains. These particular sites were selected because of their unique topographical characteristics, ideal for a hydroelectric pumped storage project. Each site is discussed below.

Cerbat Site

The "Cerbat Site" is located in the Cerbat Mountain Range, approximately 15 miles north of Kingman. This area is widely intermixed with federal (BLM, as indicated), state, and private lands in a checkerboard pattern. The project site is situated on portions of Sections 28 (BLM), 33, and 34 (BLM), Township 24 North, Range 17 West, and portions of Section 3, Township 23 North, Range 17 West.

This project site is not within a wilderness area, nor a designated Area of Critical Environmental Concern, nor an area with any other apparent special or sensitive environmental concerns. It is located on the central-northeastern corner of the Cerbat Herd Management Area Plan—a wild horse habitat area—totaling 83,501 acres, 71% of which is owned by the federal government. This proposed project is compatible with, and can effectively mitigate impacts (if any) to, the wild horse herd. As an environmental enhancement, this project would offer a new critical surface water source for the wild horses (especially applicable to draft RMP/EIS Alternative 2) and other wildlife in the area.

55-2



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Kingman Resource Area  
March 28, 1991  
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55-3

This area is shown in the KRA draft RMP/EIS as a land retention area and within the Cerbat Herd Management Area Plan. We request that the federal sections of this land (indicated above) be changed from retention to a designated disposal area through exchange. As mitigation, we will offer to purchase land in BLM-designated high-resource value acquisition areas, such as wilderness areas, for land exchange. We intend to submit a right-of-way/land exchange application to the Kingman BLM office, pursuant to Title 43, CFR, parts 2800 and 2880.

55-2

We also request that you consider moving the Cerbat HMAP boundary slightly westward. Based upon the text in the draft RMP/EIS, page 38, it appears that you considered and rejected a similar request, based upon our letter dated January 31, 1990. Movement of the Cerbat HMAP boundary should be insignificant, especially when all of your RMP/EIS alternatives discuss substantial reductions in the herd size. Further, much or most of the land in this particular area is not federal, therefore, we must question the location, need, and prudence of the federal government to acquire thousands of acres of additional lands for a herd that it will reduce in size, especially considering existing federal lands for this specific purpose already exceed 57,000 acres. Again, this project is entirely compatible with the wild horse herd if movement of the boundary is not possible.

A 230 KV transmission system will be required from the project site to Hilltop Substation (located near Hualapai Mountain Road, southeast of Kingman). The transmission route will occur easterly from the project site to Hualapai Valley, then turning southerly through Hualapai Valley (west of Long Mountain) to Hilltop substation. The southerly portion of this route through Hualapai Valley appears to follow the Lake Mead to Kingman proposed water pipeline right-of-way, as indicated in your RMP/EIS on page 40 and Map II-6.



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March 28, 1991  
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#### Hualapai Site

The "Hualapai Site" is located in the Hualapai Mountain Range, approximately 10 miles south of Kingman. This area is primarily federal land. The project is situated on portions of Sections 8, 9, 16, 17, 20, and 21, Township 19 North, Range 16 West.

Compared with the Cerbat Site, this project site requires less transmission and is ideally located in the utility's load center for Mohave County, allowing greater operating efficiency.

This project site is on the northeastern boundary of the Wabayuma Peak Wilderness Area. Since part of this project lies just inside the wilderness boundary, we ask your assistance in preparing a license application to be submitted to the Federal Energy Regulatory Commission, including right-of-way approval by the Secretary of Interior and President Bush. Concurrently, we intend to submit a right-of-way application to the Kingman BLM office, pursuant to Title 43, CFR, parts 2800 and 2880.

A 230 KV transmission system will be required from the project site to Hilltop Substation. The transmission route will occur westerly from the project site to the existing El Paso Gas pipeline, then turn northeasterly along the El Paso Gas pipeline to Hilltop Substation (located near Hualapai Mountain Road, southwest of Kingman). The northeasterly portion of this route appears to follow the existing utility corridor from Yucca to Kingman, shown in your RMT/EIS on page 40 and Map II-6.

This project site is not within an Area of Critical Environmental Concern nor an area with any other apparent special or sensitive environmental concerns. The proposed project is compatible with the local environment and can effectively mitigate any adverse impacts, including: procuring BLM-designated high-resource value acquisition areas, such as private or state lands within wilderness



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March 28, 1991  
Page Five

areas (i.e., inholdings); adding private lands, if available, from areas surrounding this wilderness area, providing a net gain in wilderness; providing a new critical surface water source to enhance the environment for wildlife in the area; and/or providing access and campground facilities for recreationists, such as backpackers, horseback riders, etc.

Please contact us if you require additional information regarding the project sites or transmission corridors.

We appreciate the opportunity to provide you with both comments regarding the draft RMP/EIS and future plans regarding the needs of Citizens Utilities to provide a competitive and reliable electric system for the people in Kingman and the surrounding Mohave County area.

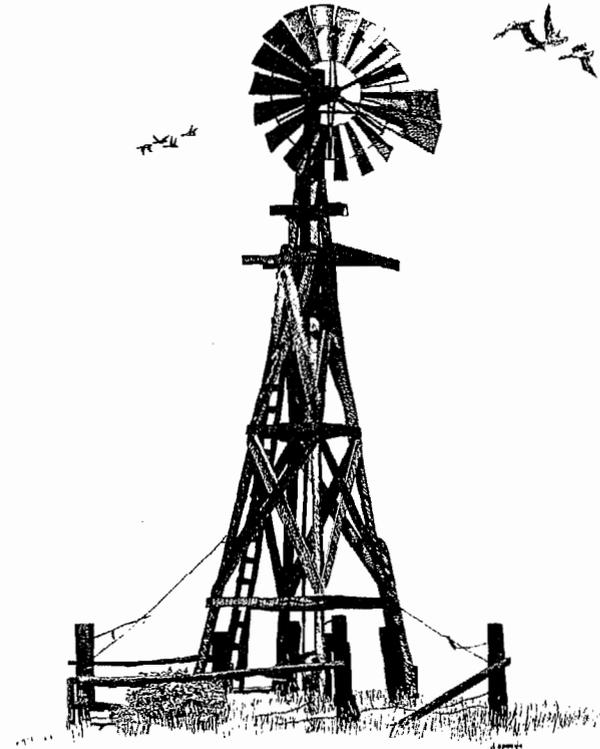
Sincerely,

PACIFIC TURBINE SYSTEMS, INC.

Rick S. Koebbe  
Vice President

cc: Mr. James P. Avery, Citizens Utilities  
Mr. Thomas J. Ferry, Citizens Utilities

P.S.: Pacific Turbine Systems, Inc. has recently changed its name to better reflect its area of business. The new company name is *Peak Power Corporation*. A formal announcement will follow in the near future.





RUSSELL D. BUTCHER  
Southwest & California Representative

March 26, 1991

Mr. Henri R. Bisson  
Phoenix District Manager  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

RE: KINGMAN RESOURCE AREA  
RMP & EIS DRAFT

Dear Henri:

Thank you for the copy of the Kingman Resource Area draft Resource Management Plan & Environmental Impact Statement. National Parks and Conservation Association, a 283,000-member nonprofit organization, founded 72 years ago to promote the protection of national parks and related public lands, appreciates this opportunity to offer comments.

In light of having been involved with the Arizona Strip RMP/EIS, I am impressed with the Kingman document. It reflects a lot of good work by you and your staff.

We are especially pleased to see the protective management provisions under Alternative 2 (Preferred Alternative), regarding such matters as the improvement and maintenance of T & E species habitat, big game habitat (desert bighorn, in particular); riparian habitat; cultural resources (including acquisition of some 3,300 acres containing important cultural values; OHV constraints in areas of especially sensitive resources; segments of rivers that may be added to the Wild & Scenic Rivers system; Areas of Critical Environmental Concern (ACECs); and proposed mineral withdrawals for particularly sensitive ACECs or parts of ACECs.

We commend you on the Alternative 2 proposals for ACECs and management prescriptions relating to each ACEC, and we strongly urge adoption of this alternative's set of ACECs. All of the areas certainly appear worthy of this protective status. We're especially pleased to see the 39,085-acre Joshua Tree Forest-Grand Wash Cliffs ACEC, adjacent to Lake Mead National Recreation Area, recommended for the special protection of this magnificent Joshua Tree area, as well as for the protective management of rare cultural values, wildlife habitat, and the Grand Wash Cliffs scenery. Likewise, we are particularly pleased with the Burro Creek Riparian and Cultural ACEC and the Three Rivers Riparian ACEC for the protective

National Parks and Conservation Association  
Box 67, Cottonwood, Arizona 86326  
(602) 634-5758

2-NPCA re Kingman rmp/eis

management of riparian values, T & E species habitat, and important cultural resources.

We suggest one possible addition to the document: a new section, under Environmental Consequences, on "Impacts to Adjoining Lands," including the adjacent National Park Service-administered Lake Mead National Recreation Area. This section (as in the Arizona Strip RMP/EIS, Page IV-31-36) could cover such matters as ACEC designations, mineral withdrawals, public access management, land exchanges/acquisitions/disposals, cultural resource protection, watershed management, recreation management, and visual resources protection. Many of the proposals can be expected to have a positive impact upon adjacent lands, including Lake Mead NRA; others can be expected to have some potentially negative impact (such as the disposal of public tracts). We strongly urge that it is important for BLM to at least succinctly describe those RMP management proposals that would be beneficial to, harmful to, or cooperative with the adjacent uses and land management of the adjacent area. On top of other obvious reasons, such a section is important because it demonstrates that BLM is aware of the potential impacts (positive or negative) upon adjacent landowners or upon the lands of other land-management agencies.

Again, Henri, thanks for letting us review this excellent document.

With best regards,

Russell D. Butcher  
Pacific Southwest Regional Director

RDB/prb  
cc: NPCA headquarters

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April 1, 1991

Bill Carter  
Bureau of Land Management  
Kingman Area Office  
2475 Beverly Ave.  
Kingman, AZ. 86401



Dear Mr. Carter:

I have written to your office previously, in enthusiastic support of the proposal in your Draft R.M.P. to designate the riparian A.C.E.C.'s for Burro Creek, Wright Creek and Cottonwood Creek, and the Three Rivers (Big Sandy, Santa Maria and Bill Williams Rivers). I am taking this opportunity to write to you again in support of this proposal, under Alternative #2 of the Draft R.M.P. during your official comment period.

These areas contain such a rich diversity of riparian bird and plant species that they deserve the monitoring and protection of A.C.E.C. status. I can speak from personal experience about the unique beauty and great number of bird species in lower Burro Creek, where I've gone hiking and bird-watching. Burro Creek also has the highest number of Black Hawks in the U.S. I was sorry that this area wasn't given wilderness status, so it would be good to designate Lower Burro Creek as an A.C.E.C., to allow it some protection. I've also become familiar with the Bill Williams River through researching information for its inclusion in the Wild & Scenic Rivers proposal by the Arizona Rivers Coalition, and I've visited the lower portion of the river on bird-watching trips. This river also deserves A.C.E.C. status since it encompasses precious resources for bighorn sheep, over 100 species of birds, including Bald Eagles, and many plant and fish species.

I'm afraid there may be some protests expressed from mining interests, however A.C.E.C. status isn't all that restrictive. It merely ensures that special riparian areas are given some measure of protection, requires mining companies to file Plans of Operations in designated areas, and to conduct their operations conscientiously. Multiple use may emphasize mineral resources in some areas, but in other areas other qualities are more valuable - such as protecting the habitat for threatened or endangered species in outstanding lush and varied riparian areas. Please do not be dissuaded from the A.C.E.C. proposals in Alternative 2 of your Draft R.M.P.

I greatly appreciate your thorough evaluation of the Burro Creek, Wright Creek and Cottonwood Creek area, and Three Rivers riparian areas for A.C.E.C. designation.

Sincerely,  
*Janine Spencer*  
Janine Spencer, Conservation Chair  
Prescott Audubon Society  
132 Park Ave.  
Prescott, AZ. 86303

cc: Senator John McCain  
Senator Dennis DeConcini  
Representative Bob Stump

58

880 DOUGLAS LAKE  
BOX 5-B

PRESCOTT, AZ 86301

APRIL 3, 1991

BILL CARTER  
BUREAU OF LAND MANAGEMENT  
2475 BEVERLY AV  
KINGMAN, AZ 86401

DEAR MR. CARTER:

WE ARE DELIGHTED WITH THE BLM MANAGEMENT PLAN (R.M.P.) WHICH RECOMMENDS THAT BURRO CREEK, WRIGHT CREEK AND COTTONWOOD CREEK AND THE THREE RIVERS (BIG SANDY, SANTA MARIA AND BILL WILLIAMS RIVERS) BE DESIGNATED AREAS OF CRITICAL ENVIRONMENTAL CONCERN. THOSE OF US WHO HAVE VISITED THESE AREAS ARE AWARE THAT THEY NEED SPECIAL MANAGEMENT ATTENTION FROM BLM. AS YOU ARE AWARE, THE AREAS CONTAIN MANY THREATENED AND ENDANGERED SPECIES WHO DEPEND UPON THESE RIPARIAN AREAS FOR SURVIVAL. WE ARE PLEASED THAT YOUR AGENCY RECOGNIZES THE IMPORTANCE OF PREVENTING FURTHER DAMAGE TO THIS LITTLE MOUNTAIN.

KEEP UP THE GOOD WORK!

BEST WISHES,  
*Glenn Franklin*  
Glenn Franklin  
Jane Franklin

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CONSULTATION AND COORDINATION

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**Southwestern Field Studies**Prescott, AZ 86303  
April 2, 1991

Bill Carter  
BLM, Kingman Area Office  
2475 Beverly Ave.  
Kingman, AZ 86401

Dear Mr. Carter,

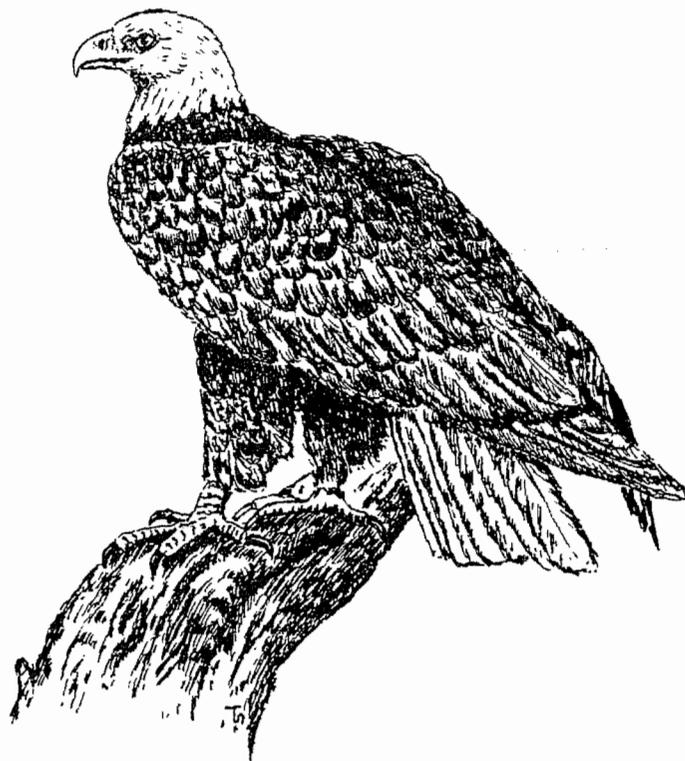
I am pleased to learn that the Kingman BLM office recommends A.C.E.C. status for the Burro Creek and Wright Creek Canyon Complex. I have spent much time on Burro Creek and agree that it is a very rich riparian area that deserves special protection.

Because these riparian areas contain habitat for several Threatened and Endangered Species, supporting large numbers of Bald Eagles and Black Hawks, care should be taken to preserve these areas in a natural state and monitor carefully the grazing allotments and mining interests. Good management is essential for these important streams.

Thank you for recommending A.C.E.C. status for these areas; I fully support that decision.

Sincerely,

Vera M. Walters



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1 of 2

April 3, 1991  
2130 Airway Ave.  
Kingman, AZ 86401

Bill Carter  
Bureau of Land Management  
2475 Beverly Ave.  
Kingman, AZ 86401

Re: Kingman Resource Area  
Resource Management Plan and  
Environmental Impact Statement Draft

Dear Mr. Carter,

We have Walnut Creek Allotment. I want to comment on the above Draft.

The first part of the Draft appears to recognize the rancher's place on the allotment. The proposed Resource Plan indicates the intent to work with the rancher without additional undue hardships to his operation.

However, further into the Draft, the Environmental Impact Statement comes into conflict with livestock grazing on public lands.

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A third of our allotment is designated wilderness. Our entire allotment is designated to the desert tortoise one, two and three habitats and the mexican vole habitat. All are listed as endangered species.

The Environmental Impact Statement, to give one example, makes references such as "severely damaged by livestock grazing" in remarks to describe the mexican vole habitat. In my opinion this is a statement from a decidedly biased study report. Statements like this plant a wrong image in the minds of the public towards livestock grazing. The damage we have found in that area of our allotment is from the javelina pigs. They are everywhere and they play havoc with the riparian areas and other vegetation areas. Yet I found nowhere in the Environmental Impact Statement that addressed this problem.

If I am understanding the Draft correctly the environmental intent is precise: if it is not compatible with the defined eco-system, remedy it.

Livestock does not fall into the compatible category. Some of the environmental remedies include: fence livestock from riparian (water) areas but leave accessible to wild life; fence habitat areas (possibly hundreds of acres) from livestock or require the rancher to keep livestock out of the area.

These restrictions are of great concern to us. A rancher could not possibly finance a public project of this magnitude. One that required him to either keep guard or be forced to fence miles of open areas in order to prevent trespass of his cattle.

2 of 2

Another concern is in the monitoring of range forage: will livestock be given priority?; will cattle be reduced to accommodate increased wild life?; how will it be determined who is eating more than their share?; wild life or cattle?.

At this period in time livestock grazing is being regulated to the lowest priority on public lands.

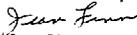
If the implementation of the Environmental and Resource Management Programs necessitate a reduction in our AUM we will be unable to survive in the livestock industry. At the present time our total livestock count allowed on our allotment is about a third of what it was some years back.

There are many instances where government regulations can harm ranchers and others by taking away the value of the land. This value can be taken in several different ways. Increased cost of production, limiting financial return or expectation, denial of use, limiting access and physically taking or occupying the land are some of the ways.

If enacted these programs will be mandated. The enforcement laws granted to these programs, by our lawmakers, supersede the rights of the grazing permittee.

I want to go on record as opposing any additional restrictions or changes in our present land use policy.

Sincerely,

  
Jean Linn

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CONSULTATION AND COORDINATION

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April 4, 1991

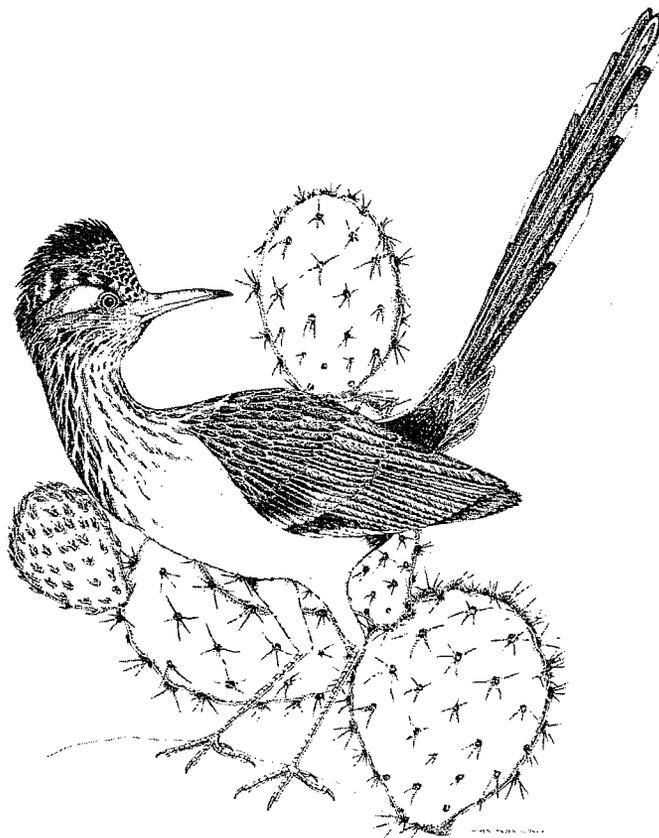
Dear Mr. Carter,

I write in support of giving ACEC status to Burro Creek, Wright Creek and Cottonwood Creek, and the Three Rivers riparian areas as has come out in the R.M.P. draft proposal.

It is important to protect and give special management attention to these areas because they contain such important riparian habitat. Someone told me that 98% of Arizona's Riparian areas have been destroyed. Given the uniqueness of this state's climate, environments and wildlife populations that is more than tragic. Giving protection to these areas listed for ACEC status is critical. They house unique associations of plants that create food and shelter for a wide diversity insects, birds and mammals including some that are threatened and endangered.

I have enjoyed some of these areas as a birdwatcher, hiker and amateur botanist but I feel that our stewardship for the land needs to go beyond personal interest to deal directly with the preservation of habitat for the plants + animals that share this planet, and this state, with us.

Sincerely,  
Rebecca Davis  
1542 Shoup St, Prescott Az. 86301





United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION  
600 HARRISON STREET, SUITE 600  
SAN FRANCISCO, CALIFORNIA 94107

IN REPLY REFER TO:

L7617(WR-RP)

April 3, 1991

Memorandum

To: Area Manager, Kingman Resource Area, Bureau of Land Management  
Attention: Gordon Bently

From: Associate Regional Director, Resource Management and Planning,  
Western Region

Subject: Draft Resource Management Plan/Environmental Impact Statement for  
the Kingman Resource Area, Mohave, Yavapai and Coconino Counties,  
Arizona (DES-90/29)

The following are the review comments of this office, Lake Mead National Recreation Area, Grand Canyon National Park and our Washington Mining and Minerals Division on the subject document. Our major areas of concern include actions involving mineral activities, off-road vehicle designations, burro management, grazing, watersheds, and land disposal adjacent to the parks.

**Burro Management**

1. On page 36, Map II-4, the map shows a portion of the Black Mountain wild horse and burro herd management area covering Lake Mead NRA lands. We recommend that this map be revised so that the herd management area does not include park lands as there is no authority for such designation within National Park Service (NPS) areas by the Bureau of Land Management (BLM). While Lake Mead NRA intends to continue working with the Kingman Resource Area and Arizona Game and Fish Department for the management of burros within the Black Mountains, there are fundamental differences in mandates and objectives concerning burro use between the agencies. We will continue to work within the interagency framework to achieve mutual goals within those historic use areas of the Black Mountains, as represented by the herd management area map. However, we are opposed to the establishment of new populations or herds of burros in areas outside of the historic use area as represented by the herd management area map.

2. We view differently some of the burro impact discussion found on pages 123, 129, and 146, pertaining to impact levels upon sensitive vegetation species and riparian areas. The mandates and objectives referred to in Item 1 above may result in differing interpretation of burro impacts within Lake Mead NRA.

**Off Highway Vehicles (OHV)**

1. On page 46, Map II-7, at the intersection of Township 29 and 30 North, Range 15 and 16 West, there is a block of land shown unshaded indicating "designation for existing roads, trails and washes." We recommend this block of land, adjacent to Grand Canyon NP, be identified as "designated roads and trails only." We would appreciate knowing how these areas will be designated so that the public will be able to differentiate the BLM areas from Grand Canyon NP, where no off-highway vehicle travel is permitted.

2. As discussed at your scoping meeting by our Lake Mead staff, our preference for areas adjacent to Lake Mead NRA would be vehicles limited to "designated roads, trails, and washes," for consistency with the recreation area's policies. Recent discussions indicate that this may not be possible for the length of the recreation area boundary. We recommend that at a minimum, a discussion be included within the Resources Management Plan document advising the public of the different policies for recreation area, and suggesting that they contact the recreation area for further information. We also recommend a map within the document showing the designated roads within Lake Mead NRA open to vehicles. As we discussed with you, such information is digitized and the recreation area staff will be glad to assist you in map preparation. In addition, the recreation area would like to work with you to develop joint hand-outs and future public education programs concerning OHV use.

**Mining Operations**

1. The discussion of potential mineral occurrence and development in the Environmental Impact Statement (EIS) is not clear in that it does not provide sufficient information on which to assess potential impacts of mineral development on NPS units. The word "potential" is used in the document to mean both potential occurrence and potential mineral development. Because it is used interchangeably, the reader has no way of knowing the intended meaning.

2. The EIS contains significant inconsistencies in the description of size and location of the planning area. The maps provided with the EIS appear to cover only the western half of the Kingman Resource Area. Mineral development in this half has the potential to impact Lake Mead NRA and Grand Canyon NP. While a map of the eastern half was not provided, it is our understanding that this area is included in the planning area. The EIS (p.7) states that all three counties in the planning area

62-1

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3

"contain a wealth of minerals." Mineral development in the eastern portion of the resource area could impact at least three additional NPS units: Wupatki, Sunset Crater, and Walnut Canyon National Monuments, with Wupatki being the most likely. These three units are under the jurisdiction of our Southwest Regional Office in Santa Fe, New Mexico, and we recommend that office have the opportunity to review this document and coordinate with you if any of the three units might be impacted by present or future mining operations on public land.

62-2

3. In a conversation with our Mining and Minerals Branch personnel, your staff stated that mineral development potential for the unmapped area is low. However, page 95 of the EIS states that more than half of the minerals in the resource area have high occurrence potential. The following have moderate or high potential: copper, gold, iron, lead, manganese, niobium, silver, tungsten, uranium, zinc, fluorite, feldspar, lime, salts, silica, and sand/gravel. In addition, over 400,000 acres of federal minerals in the Kingman Resource Area are not addressed in the planning document (the plan covers 2.18 million acres, yet the resource area contains 2.6 million acres). The plan does not address this discrepancy, nor state where the acres are geographically located. This is particularly important in the case of mineral development, since possibly five NPS units fall within the planning area and potentially could be affected. The plan and EIS do not provide sufficient details to assess the potential impacts to these NPS units.

4. From information provided in the document, both the Lake Mead NRA and Grand Canyon NP have the potential to be significantly impacted by mineral development in the Kingman Resource Area. The EIS maps show high development potentials for salables (e.g., sand and gravel), leasables (e.g., salt/halite), and locatables (e.g., metallic minerals) adjacent to Lake Mead. Likewise, there is a high potential for the development of locatables adjacent to Grand Canyon. There is no specific information regarding the development potential near the boundaries of the aforementioned three national monuments in the eastern area. We recommend that the bonding of operations in or near the viewshed of an NPS unit be mandatory.

62-2a

This recommendation can be used as part of your efforts to maintain a cooperative relationship and to consult with federal agencies, as committed to in the EIS. Also, we request that you notify our affected management units and provide them an opportunity to review mineral-related environmental documents and specific plans of operations in the Kingman Resource Area.

5. The EIS states that the transfer of some public land out of federal ownership will occur and that this will impede mineral development of these lands (p.119, 131, 141). We are not clear as to why this would be the case. We are concerned, however, that mineral development on such transferred lands may no longer be under the control of the BLM mining or National Environmental Policy Act

4

regulations. This is a potential impact on any adjoining NPS units that should be discussed.

#### Other Specific Comments

1. On page 38, under Public Lands in Coconino County, the potential impact of disposal of these lands on any of the three national monuments previously mentioned as being in that area should be identified.

62-2b

2. On Page 41, Map II-6, Utility Corridors, shows a utility corridor ending at the Lake Mead NRA boundary in the Meadview area. Presumably, this reflects the preliminary planning for the proposed Tran Am pipeline. Lake Mead NRA has only had preliminary discussions with Tran Am at this time, and designation of a defined right-of-way is premature at this point. We recommend eliminating this corridor from the map due to the tentative nature of the planning at this time. We should, however, continue to coordinate our right-of-way planning process for this or any other corridor potentially crossing from BLM to NPS administered lands.

62-3

3. On page 42, under Watershed Resources, we suggest the plan incorporate the state of Arizona's water quality standards that address "best management practices." These best management practices influence grazing management.

4. On page 58, Table II-7, and Page 201, regarding Joshua Tree - Grand Wash Cliffs ACEC, we are highly supportive of special designation for this extremely significant area. The Joshua tree forest is a designated National Natural Landmark, a designation reflective of its scenic beauty and high quality natural resource values. We strongly recommend that the entire ACEC be withdrawn from mineral leasing. This area should be afforded the highest possible degree of resource protection. Lake Mead National Recreation Area is interested in pursuing joint planning for educational programs for this area.

62-4

5. On page 68, in Table II-9, grazing management activities should include compliance with Arizona water quality standards for non-point sources.

6. On page 122, under From Rangeland Management, mitigation to meet requirements of the "best management practices" under Arizona state water quality standards should be identified.

7. On page 133, under Impacts to Watershed Management from Mineral Development, drainages that enter a unit of the NPS should be withdrawn or otherwise protected from mineral development.

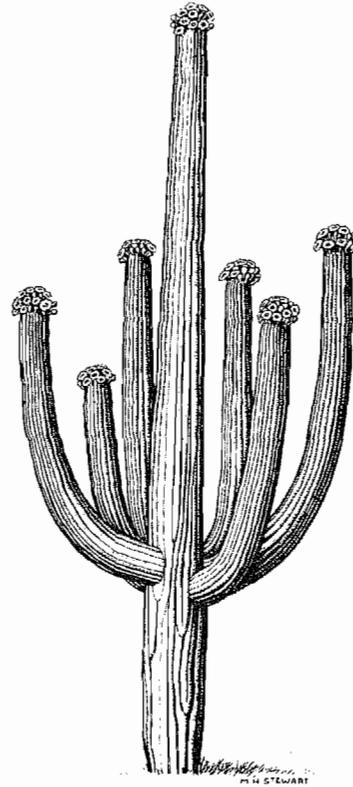
8. On page 202, under Management Prescriptions (#11), rights-of-way should be routed along existing corridors where possible.

9. We note the plan identifies five potential wild and scenic rivers. In this regard, we recommend you coordinate with the Arizona State Parks Board which is preparing an Arizona rivers assessment with the cooperation and assistance of the NPS, in order to determine if additional streams in the Kingman Resource Area should be identified. The appropriate contact is Tanna Thomburg, Arizona Streams and Wetlands Heritage Program, 800 W. Washington, Suite 415, Phoenix, AZ 85007 (telephone 602-542-1996).

We appreciate the opportunity to review and comment on this plan and environmental statement.



cc:  
Superintendent, Lake Mead National Recreation Area  
Superintendent, Grand Canyon National Park  
Regional Director, Southwest Region  
Chief, Environmental Quality Division, National Park Service  
Mining and Minerals Branch, National Park Service, Denver, Colorado



63

**Kingman Area  
Chamber of Commerce**  
P.O. BOX 1150  
KINGMAN, ARIZONA 86402-1150  
(602) 753-6106



Ms Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Ms. Marquis,

We laud the BLM for doing long range planning in the Kingman Resource Area. However, we have some grave concerns about the implications of the Draft document of the KRA's RMP/EIS.

These concerns are listed below in a spirit of co-operation and are not critical in any way of you or your staff. These comments are very general in nature and reflect primarily economic and land value concerns!

I. We know that your office does not dictate the format for the RMP/EIS document, but wish you to know that it is terrible when it comes to an "outsider" trying to make intelligent meaning of it's contents. The manner in which it jumps around and changes subject matter and references numerous other documents makes it almost impossible for the public to make earnest and honest comments as to it's contents. To say the document is confusing is an understatement at best. It can only be understood by those on the "inside" who have been working with it's development since the first beginnings of the planning process.

II. Map inside front cover: We have noticed that this area includes a large amount of private (Fee Land) and State School Trust Lands, where no federal land is involved, other than where subsurface mineral estate is concerned. We could not find anything in the document where it says that the BLM does not intend to attempt to impose surface environmental management to those properties. If the BLM does not intend to force management in these areas, a section in the Summary under the description of the "Planning Area", page ix, should clarify this concern on the final of the document, for all concerned parties. We are concerned about the negative effect that this proposed management action could have on Fee Land values, as well as the ability of the State Trust to generate the maximum revenues possible, if some sort of explanation is not spelled out up front.

63-1

III. With the passage of recent Wilderness Legislation, the advent of ACES's, riparian area management, endangered species designations, and a host of other parameters, our concern is for the perceived erosion of the "multiple use management" concept of public land management. We feel that without the maximum amount of "multiple use" as possible, it will greatly impact the amount of entrepreneurial activity on the public lands. As you are aware, the "in Lieu" taxes paid by the BLM nowhere compare to the taxes Fee Land holders pay on a per-acre basis. Therefore, the maximum amount of "multiple use" of public lands are necessary to generate revenues to offset that difference, and to create commerce and jobs within a county that is for the most part owned by the federal government.

IV. We find the document to be very general in nature, and hope that the BLM has intentions of more specific plans for various management areas that will require the inputs from all affected parties before actual activity begins on the site or actual management policy is set for specific sites or areas.

Above we have listed some concerns for your consideration. Below we list some recommendations that may assist BLM in the mitigation of those concerns:

(1) Recommend that the KRA RMP/EIS more fully describe which lands they intend to impose management on that are within the KRA. This description should take place within the summary on page ix of the document.

(2) Recommend that the BLM choose whichever management scenario that allows the largest amount of "multiple use" of the public lands. We feel that alternative 1. accomplishes that end the best.

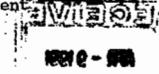
(3) Recommend the BLM use those management plans that have the least negative impact upon the values of private (fee) land or limiting any otherwise legitimate business that may operate in harmony with public land management policy. We feel that alternative 1. accomplishes this best.

In closing, we wish to thank you at this time for your consideration and co-operation with our concerns and recommendations.

Sincerely,

*Carla Malvick*  
Carla Malvick  
President

*T.R. Orr*  
T.R. Orr  
Secretary



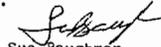
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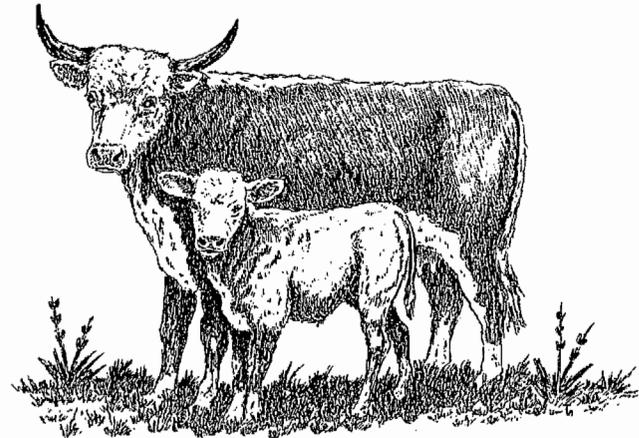
Sue Baughman  
P.O. Box 634  
Dolan Springs, Az 86441  
8 April 1991

Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly  
Kingman, Az 86401

In regards to your meeting in Dolan Springs, Az., January 24 1991. I found your alternative plans contradicting each occasionally with a lot of double talk. You left out sections dealing with the cattle growers/wilderness; because it was being address in another study. However; by leaving these items they can some times be lost in the government shuffle of paperwork and the overall picture cannot be seen.

My main concern is the wild horse herd in the Cerbat Mt range. I feel that this herd should be reduced to 50 head of horses or less. Thus allowing ample feed for the horses, cattle allotment and deer population and by maintaining the springs at higher elevation will keep the horses from coming down to the lower elevation and commingling with the rancher's cattle.

  
Sue Baughman



CONSULTATION AND COORDINATION

65

*Headquarters West, Ltd.*

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3275 INA ROAD  
SUITE 100  
TUCSON, ARIZONA 85741  
(602) 742-2211

April 8, 1991

Ms. Elaine F. Marquis, Area Manager  
Kingman Resource Area Office  
Bureau of Land Management  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Ms. Marquis:

This letter is in response to the Resource Management Plan and Environmental Impact Statement Draft. On November 28, 1990 the Arizona Wilderness legislation was signed by President Bush creating the Upper Burro Creek wilderness, of which a part of the Yolo BLM lease is located in this wilderness. The point that I want to make is, the main reason why this area is so pristine and beautiful in its natural state as it is now, is the result of good management and stewardship of the land. This has been and currently is under the management of the present rules and regulations of the Bureau of Land Management (B.L.M.) in cooperation with ranches, who are the "true environmentalists" and "stewards" of the land.

I believe that the existing policies of the B.L.M. together in working with each of the grazing permittees are more than adequate in doing their respective jobs. There have been many research reports published in the last few years, by various government agencies and land grant institutions stating that our public rangelands in the west are in their best condition ever in the last 100 years. This is backed by scientific data that has been collected and analyzed since the early 1900's. This is proof and evidence that the government agencies (i.e.-BLM) in cooperation with the cattlemen are doing a great job in managing our public lands. "If it is not broke, why fix it?" is the question that I ask?

In reference to ACEC's, Section 103 (a) of Public Law 94-579 defines Areas of Critical Environmental Concern (ACEC) as areas within 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

*Agricultural Real Estate, Appraisals, Management, Consulting*

Elaine Marquis  
Page 2

processes, or to protect life and safety from natural hazards. The important and key statement is: "to protect and prevent irreparable damage". I believe that the majority of the ACEC's proposed in Alternatives 2 and 3 do not meet the criteria of this definition. As I described earlier in this letter, I believe that the existing BLM policies that are implemented are doing a outstanding and efficient job together with the individual support (both financial and physical) of each grazing permittee. I do not feel that the ACEC's proposal for riparian and wildlife protection certainly is not in danger of irreparable damage. Multiple use is governed by many rules and regulations already in place. Livestock grazing is regulated and managed through the AMP Program; wildlife habitat is managed through the Habitat Management Plans, Mining is regulated through mining notices and Mining plans of operation, etc. As you know, any damage to vegetation is reparable. A good example of that is the Burro Creek Flood that occurred in 1978-79, where all of the vegetation was totally removed and obliterated by "Mother Nature". Presently through careful allotment management planning, between the rancher and the BLM, the plant community in Burro Creek has been re-established and the riparian area is known to be one of the most rigorous and beautiful in the entire state. In fact, this has been so successful, that the rancher, our neighbor, recently just received BLM's highest award in riparian management. This is an excellent example showing that through good management practices, that most damage to vegetation is reparable!

I believe that the ACEC designations should be limited to as the law requires to areas where irreparable damage is likely, such as specific cultural areas or localized site specific habitat for threatened and endangered species.

As you are aware, the final decision on this draft document is not a simple selection of either Alternative 1, 2, or 3 from our perspective, there are good and bad segments of each alternative. A combination of management decisions taken from selected parts of each alternative will provide the most workable and realistic Resource Management Plan to serve as a guide to your agency. As a livestock operator on public lands, we do prefer Alternative 1 with some portions of Alternatives 2 and 3 combined with it. In conclusion, we want to reiterate that the present philosophy and policies of the Bureau of Land Management together in working with the rancher is working extremely well. This relationship and the results of this fine relationship between the cattle industry and your agency needs to be told to the public. Your agency can do this

Elaine Marquis  
Page 3

and must do this. What a success story to tell the "American people"! Your staff and the ranching community are doing a great job in managing our rangelands. This is happening every day throughout the west. Tell the public! This is why we have so many beautiful & pristine areas. Let's keep it that way.

We at the Yolo Ranch do want to thank you for the opportunity to provide input into this important document. If you have any questions, please contact us.

Sincerely,



Andy Groseta, Manager  
YOLO RANCH

cc: Jack Croll

jlm



66

# LIQUINOX *Company*

221 WEST MEATS AVENUE ORANGE, CALIFORNIA 92665-3386  
Phone (714) 637-6300

April 8, 1991

Kingman Bureau of Land Management  
2475 Beverly Ave.  
Kingman, Arizona 86401  
Attention: Resource Management Plan

To Whom It May Concern,

The following is a reply regarding the current Environmental Resource plan for Mohave County.

The Liquinox Company in this letter will be addressing only the "Selective Harvesting" of the Yucca Schidigera in the county area.

Beginning in 1954 on private lands, and then starting in 1958 on Federal Lands, the Liquinox Company has been harvesting yuccas for their liquid fertilizer operations. Prior to 1954 the harvesting and processing was done in California.

Since moving to Kingman, Arizona in 1954, we have supported a minimum of two (2) full time men and sometimes in years past up to six (6) full time men, thus investing into the local economy up to \$65,000.00 per year. Our basis for our plant in Kingman is harvesting from the desert.

When we started in 1954 on private land, we set a rule that any plants under three (3) feet tall would not be harvested. This was the first conservation rule that had ever been considered regarding harvesting plants from the desert.

Over the years through cooperation and input from the local Bureau of Land Management office, we have arrived at a process of "Selective Harvesting", which we feel has proven to keep the yuccas as a renewable resource.

Prior to the 1970's, we used large trucks and personnel that were paid by the ton delivered to our plant. In the 1970's when ecology came along, both the Bureau of Land Management and the Liquinox Company altered our harvesting process to reflect improvements in harvesting. Today we no longer take



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# LIQUINOX *Company*

221 WEST MEATS AVENUE ORANGE, CALIFORNIA 92665-3386  
Page 2 Phone (714) 637-6300

six hundred (600) tons per year with per tonnage paid personnel. We use strictly company men and the tonnage has been decreased to fifty (50) tons per year. This has had no noticeable impact on the desert areas. Using our current method of "Selective Harvesting" and our reduced tonnage per year (50 tons) we feel that this process is the best harvesting done over the last thirty some years in both California and Arizona. An example of this process and its results can be shown by our 1982 Governors Award from the Commission on the Arizona Environment (copies attached). We feel that this award was well deserved in that we have tried very hard to do the least damage and maintain the yuccas as a renewable resource. The award represents a combination of efforts between the Liquinox Company and the local Bureau of Land Management office and it shows that a commercial operation and government agency can work hand in hand with beneficial results.

There are some areas that we have cut in the past fifteen (15) to twenty (20) years that one could pass by and not know that we had been there. Our current program of full time company paid employees, reduced log consumption and even recently replacing our truck with a lighter weight truck with wider tires is an example of Liquinox Company trying to maintain the harvesting of yucca schidigera as a renewable resource. We feel that it can be done if done correctly.

We know that "Selective Harvesting" can be done under proper regulation since we have been doing just that for the last fifteen (15) years. The Liquinox Company is a concerned commercial operation that believes that the yuccas can be harvested on a selective basis and still be a renewable resource.

The areas that we have harvested in have shown an increase and betterment of the desert. Only select logs have been carefully removed from the area, leaving the lesser logs and new off-shoots surviving. Maybe its not the most scientific data collected, but it seems to show that our selective thinning can keep the yuccas growing.

Lets keep the desert open for qualified companies that have shown that they can do the job, cooperate and show results.

Sincerely,

Henry C. Garner



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314

67

Arizona Public Service Company  
P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

April 9, 1991

Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Ms. Marquis:

This is in response to the Kingman Resource Area RMP update, dated November 1990. Our utility planners have reviewed the proposed utility corridor in Alternative 2, your proposed alternative. We currently have no plans to construct transmission lines outside of these proposed corridors.

We do have plans to be a participant with the Salt River Project and others in the construction of the Mead-to-Phoenix 500kV transmission line. It appears that this line will be within the utility corridors of your proposed alternative. Enclosed is a copy of our Ten Year Plan (see page 5 for the Mead-Phoenix project). Also enclosed is a map showing the route for this line.

Thank you for the opportunity to comment on the Kingman Resource Area RMP update.

Sincerely,

  
Frank C. Shields  
Environmental Department

/m

Elaine Marquis  
April 9, 1991  
Page 2

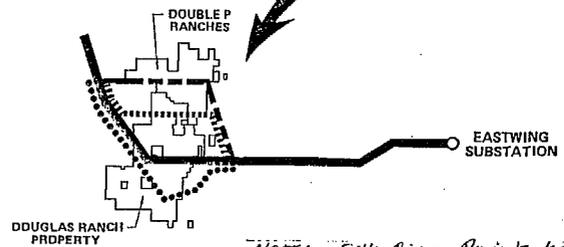
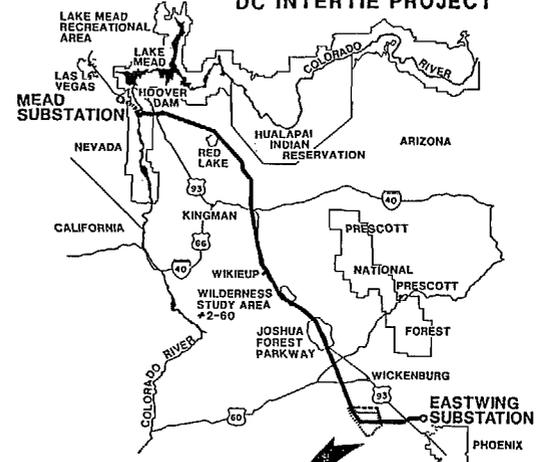
bcc: Robert Cook 1320  
Ralph Berry 9170  
Jim Dugan 3278

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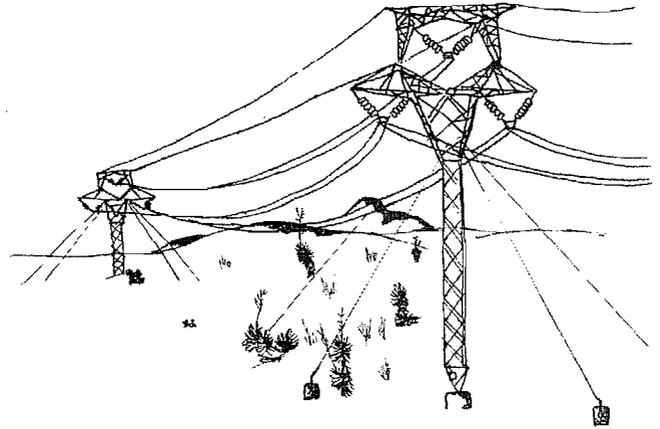
CONSULTATION AND COORDINATION

MEAD-PHOENIX  
DC INTERTIE PROJECT



- LICENSED ROUTE
- PREFERRED ROUTE
- - - NEVADA PORTION
- ..... FIRST ALTERNATE SEGMENT
- ..... SECOND ALTERNATE SEGMENT
- ..... THIRD ALTERNATE SEGMENT

*Notes: Salt River Project has the lead on this project. APS's participation is anticipated.*



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Cyprus Bagdad Copper Corporation

Post Office Box 245  
Bagdad, Arizona 86321  
Telephone (602) 633-2241

April 11, 1991

Mr. Bill Carter  
U. S. Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Mr. Carter,

Attached is the original Transcript of Proceedings recorded by Sonia Y. Felix, Court Reporter, at the KRA RMP/EIS public hearing held in Bagdad, Arizona on January 23, 1991. This official transcript is hereby presented as part of the public comments to be included in the BLM Kingman Resource Area's Resource Management Plan and Environmental Impact Statement.

The people of the Bagdad area generally support preservation and enhancement of riparian and recreational values in the central Burro Creek area. However, we are deeply concerned that unnecessarily restrictive management, proposed for this area under the RMP's Alternatives 2 and 3, poses a very real threat to our livelihood and the future of our community. Upper Burro Creek is now protected by Wilderness, and conservation and enhancement of central Burro Creek can best be achieved by a comprehensive program of cooperative management.

Once again, we wish to thank you for the opportunity to participate in the formal public comment process.

Sincerely,

CYPRUS BAGDAD COPPER CORPORATION

*Phil M. Blacet*

Phil M. Blacet  
Environmental Coordinator

cc: H. Cosner  
C. Bromley  
H. Bisson  
file

**CYPRUS**

69

Bureau of Land Management  
Kingman Area Resource Office  
Gordon Bently,

April 12, 1991.

*Mr. Bently,*

*This is to inform you that I am in agreement with the Mohave Livestock Association in regards to the written comments on the DRAFT of Kingman Resource Management Plan and Environmental Impact Statement.*

*I believe that DRAFT EIS language needs to be rewritten to continue the multiple use concepts required for natural resource management.*

*Sincerely,*  
*Martin Hunt*

FOREMAN,  
DALE SMITH RANCHES  
Dolan Spring, Ariz.  
P.O. Box 1451, 86441

CONSULTATION AND COORDINATION

317

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April 10, 1991

Bureau of Land Management  
Kingman Area Resource Office  
Elaine Marquis, Director

Dear Elaine,

This is to inform you that I am in complete agreement with the Mohave Livestock Association in regards to the Written Comments on the DRAFT of Kingman Resource Management Plan and Environmental Impact Statement. A copy of the comments is enclosed.

I sincerely hope that DRAFT EIS language can be rewritten to continue with the multiple use concept and the continued cooperation, consultation and coordination between the ranching community and BLM.

Sincerely,

*Frank L. Hunt*  
Frank L. Hunt  
P.O. Box 58  
Peach Springs, Az.  
86434

318

71

April 12, 1991

To - B. L. M.

In regard to the proposed R.M.P.  
I assure you every permittee and land  
owner that I have talked to in the Kingman  
area are apposed to all 3 alternatives.

71-1

How can you ignore sec. 8 of the  
organic act passed by our Congress?

As a member of the Kingman Resource  
area advisory board & the Arizona advisory  
board for B. L. M. I ask you not to  
adopt this R. M. P.

Sincerely  
*John L. Neal*

April 10, 1991

David B. Wilcoxon  
Urban/Regional Planning  
University of Illinois  
907 1/2 W. Nevada  
Urbana, Illinois 61801

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Mr. Carter:

Having reviewed the draft Kingman Resource Area Resource Management Plan and Environmental Impact Statement, I offer the following comments.

#### PURPOSE AND NEED

The Purpose and Need section adequately identifies the issues and concerns pertaining to the Kingman Resource Area. The planning criteria established to address these issues are comprehensive and appear to be all inclusive. In my opinion, this portion of the DEIS is outstanding.

#### PLAN ALTERNATIVES

Under the section titled Plan Objectives and Guidelines, it is stated that "The overall goal of KRA is to provide multiple use and sustained yield resource management of the public lands." Perhaps a more appropriate goal (given the extreme sensitivity of the KRA) is *to provide multiple use and sustained yield in limited areas; thereby preserving a majority (> 75%) of KRA's cultural and biological resources for subsequent generations.*

In essence, my question is: What is the rationale for a goal that maximizes multiple use (i.e. 85% of KRA is open in some form to OHVs) and sustained yields over a goal that maximizes the environmental sanctity of the KRA while providing for sufficient, yet not excessive, multiple use and sustained yields? It would seem that the above "goals" are actually potential alternatives. This leads me to my next point.

#### ALTERNATIVES

After reviewing the three alternatives it was quite apparent that they are very similar-- in fact, almost identical. For example, of the thirteen categories common to all three alternatives (Minerals, Lands, Watershed Resources, Vegetative Products, Rangeland Management, Cultural Resources, Recreation Management, Wildlife Management, Special Status Species Management, Riparian Area Management, Special Management Areas, Wild Horse Burro Management, and Support Services), eight of the thirteen "Plan Actions" of Alternative 2 are similar and/or identical to the "Plan Actions" of Alternative 1. Moreover, all thirteen of the "Plan Actions" of Alternative 3 are essentially identical and/or similar to the "Plan Actions" of Alternative 2. The implications of this structure is a negation of the alternatives; in this regard, the DEIS fails to adhere to the NEPA requirement of presenting and investigating all possible, viable alternatives.

72-1

To remedy this situation, I propose a fourth alternative that will favor and enhance protection of the natural resources to the complete exclusion of mineral mining, grazing, and OHV use in a significant portion of the KRA (i.e. > 75% of the total area above and beyond the ACECs and WSAs).

72-2

#### SPECIFIC COMMENTS/QUESTIONS FOR ALTERNATIVE 1

72-3

1. Given that a soil survey for the southern half of KRA will not be completed until 1993, how did the BLM assess the impacts of the three alternatives on KRA soil resources?

72-4

2. Given that a vegetation survey (currently being conducted) will not be completed until 1993, how did the BLM assess the impacts of the three alternatives on KRA's vegetation resources?

3. On page 31, under section Off-Highway Vehicles, it states that "a total of 409,377 acres would be closed to OHV use following designation of wilderness by Congress." This amounts to only 16% of the total KRA. Clearly this is inadequate given that two of the BLM's goals are to "Maintain and enhance wildlife habitat to ensure viable populations and natural diversity and to Maintain the open space, scenic character, and remoteness of public lands." Granting OHVs access to 84% of the KRA certainly will not achieve these goals. OHVs are extremely noisy, disruptive, and destructive in a desert environment. The whining noise of a X-Country motorcycle can be heard for miles in a desert environment thereby effectively destroying the "remoteness" objective. In addition, it is

highly unlikely (given the lack of supervision which will occur in remote areas) that individuals engaging in OHV use will restrict themselves to "existing roads, trails, and washes."

4. Please supply more information on the Visual Contrast Rating Worksheet and its procedure for completion.

#### SPECIFIC COMMENTS/QUESTIONS FOR ALTERNATIVE 2

1. On page 37 under the section Minerals, it states that a "total of 2,131,242 acres are open to locatable mineral exploration and development of federal minerals." This is approximately 85% of the total KRA. Mining, (with its heavy equipment and necessary road network), does little to achieve the stated goal of "*minimize(ing) long-term impacts to the visual quality of sensitive landscape characteristics and or accomplishing "special management emphasis in areas with unique features or special management needs."* If it is estimated that over the life of the plan roughly 1,700 acres will be disturbed by mining operations, why not make this the total number of acres allowed for mining with a specified additional area allowed for site access?

72-4a | 2. Please further explain what is meant by the statement on p.38 "consolidate land ownership for better resource management and to block up state lands to maximize revenue producing development."

72-4b | 3. Please justify why a 1-2 mile wide corridor is necessary for utility ROWs. If the ROW ran directly N-S across the longest possible axis, (approximately five miles east of the town of Kingman), this would be a 2 x 114 square mile area or 145,920 acres (nearly 6% of the KRA).

72-5 | 4. On p.42, What criteria were used to establish the four categories used to classify grazing allotments?

72-6 | 5. The objective for Vegetative Products "to meet public demand for vegetation resources on public land on a sustained yield basis without impairing resources" seems to conflict with a following sentence which states "When demand for a product exceeds the supply on a sustained yield basis, permitting for harvest would be carried out through a sealed-bid procedure." Does this imply that harvesting will continue beyond sustained yield limits, effectively impairing the resources? Please clarify.

6. Under section OHV Designation (p.45), it states that only designated wilderness areas would be closed to OHV use. Bearing in mind that these

wilderness areas do not officially exist and may not for some time (if ever), the BLM should make extra-ordinary provisions to ensure the preservation of both wilderness areas and ACECs. Furthermore, what is the use of designating an area as an ACEC if OHV use will still be permitted?

7. The illustration on page 45 accurately depicts OHV use. Notice the vehicle does not appear to be on an existing road, trail, or wash as he or she drives over sensitive vegetation and habitat. Any desert tortoise seeking shaded refuge from the sun's searing heat is likely to perish as sensitive cover species are destroyed.

72-7 | 8. Please provide the definition of a "wash" as employed by the BLM.

9. Table II-4 on page 47 appears to contain an error. Under Alternative 2 OHV Designations With Wilderness: "Limited to existing roads, trails, and washes" is repeated twice with separate acreage values.

72-8 | 10. Please explain the justification for allowing mineral leasing on identified lambing grounds and in riparian areas (p.49) and define what are the "special stipulations" that would protect these resources.

72-9 | Furthermore, how was the figure of 41,104 acres (1.6% of KRA land) to be designated NSO obtained?

#### SPECIFIC COMMENTS/QUESTIONS FOR ALTERNATIVE 3

1. Table II-8 "Management Prescriptions for ACEC" illustrates the lack of viable alternatives-- fifteen of the twenty ACECs prescriptions contain the phrase "Prescriptions are the same as in Alternative 2."

2. OHV Designations for Alternative 3 vary little from Alternative 2. In the more critical category: amount of acreage "closed" with "wilderness designation", both figures are identical.

72-10 | 3. The following sentence appears under the section titled Riparian Area Management (p.78). "Same as Alternative 2, except the ACEC covering Wright and Cottonwood Creeks would include only the area immediately along the creeks and not the area further back from the drainages." Please specify the distances implied in this sentence.

72-11 | 4. I find the Map II-11 misleading. From the legend it appears that a very small area is open to OHV use when in reality all but the designated closed area is actually "open"; albeit with limited restrictions.

**SPECIFIC COMMENTS ON ENVIRONMENTAL CONSEQUENCES**

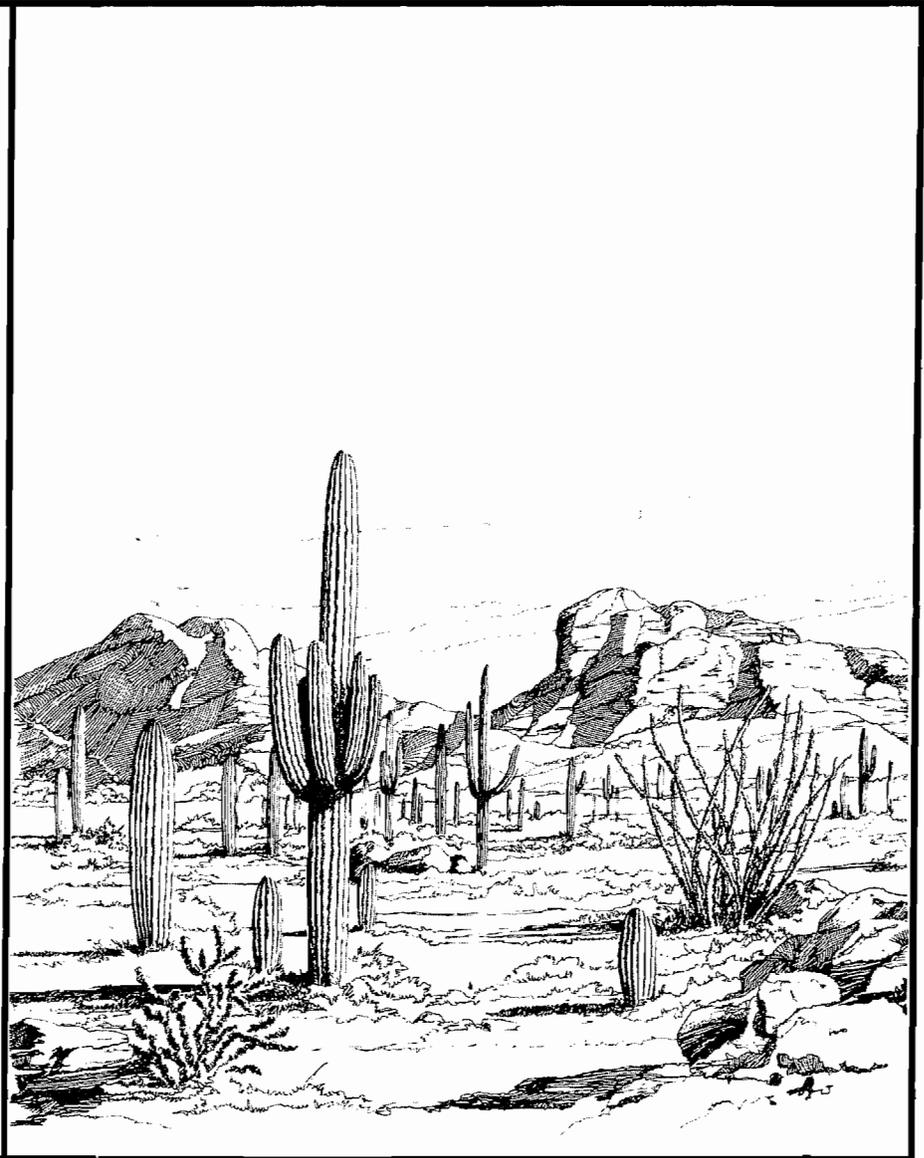
1. The text describing the environmental consequences of the proposed alternatives again illustrates a lack of variation among the alternatives. The environmental impacts of Alternative 2 are the "same or similar" in approximately sixty instances. Likewise, Alternative 3's impacts are the "same or similar" to Alternative 2 in approximately 54 cases.

**72-12** | 2. The most alarming aspect of this section is the lack of a substantive and exhaustive discussion of the short and long term environmental impacts to the KRA environment, not the elements of the management plans.

This concludes my comments and review of the Kingman Resource Area Resource Management Plan and Environmental Impact Statement. I hope you will address my stated concerns. Please send me a copy of the final impact statement.

Respectfully,

David B. Wilcoxon



73

March 31, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

As a permittee on the Big Bend allotment in the Kingman Resource Area I have some concerns about the Draft Resource Management Plan for the Kingman Resource Area.

I find the draft plan lengthy and difficult to understand. I am confused as to what impacts the proposals in the draft plan such as ACEC designations, wildlife habitat, riparian management, access, water quality, endangered species management, and many other of the proposals will have on my ranching operation, if implemented into a final plan.

Could you please summarize any changes which would occur with regards to my ranching operation (i.e.; grazing preferences, livestock management, range improvement construction and maintenance, access, etc.) if the proposals in the Draft RMP are implemented into the Final RMP.

Upon receipt of your written response to this letter I plan to send comments on the draft plan.

Thank you for your help in clarifying the impacts these proposals will have on my ranching operation.

Very truly yours,

*Glen S. Barton Pres.  
Wagon Beam Inc*

cc: Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

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MOHAVE COUNTY PARKS DEPARTMENT

P.O. BOX 390 • 305 OAK STREET • KINGMAN, ARIZONA 86402-0390 • 753-0739



April 11, 1991

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

RE: Resource Management Plan

Dear Mr. Carter,

Thank you for the opportunity to participate in the BLM planning process on the Kingman Resource Management Plan. The Mohave County Parks Department has reviewed the plan and has met with members of your staff concerning the plan.

As discussed with you at our last meeting, the need for regional public park facilities in the Mohave Valley is growing tremendously. With all of the present and projected population growth in this area, the need for ball fields and park and open spaces is great. Mohave County has identified one possible site that will help us accommodate this demand, and we request that you set this land aside for Recreation and Public Purpose Leasing. The land that we identified is T.18N., 21W., Sec. 7 E., consisting of approximately 320 acres. It is our understanding that this site has also been identified for other public purpose uses which would be compatible with park purposes. It is hoped that within the next 3 to 5 years, the Mohave County Parks Department will have the resources to begin construction on a regional park in the Mohave Valley area.

Once again, thanks for the opportunity to comment on your RMP.

Sincerely,

*Thomas W. Brady*  
Thomas W. Brady  
Director

74-1

75

April 11, 1991

BLM,

AS A RESIDENT OF THE YUCCA AREA AND IN THE KINGMAN RESOURCE AREA, I WOULD LIKE TO COMMENT ON THE RMP/EIS. THERE IS A LOT TO BE SAID FOR MAINTAINING THE STATUS QUO. HOWEVER, SINCE THIS IS NOT A LIKELY ALTERNATIVE, I WOULD OPT FOR ALTERNATIVE 2.

IT IS A MORE MODERATE PLAN THAN ALTERNATIVE 3 AND WOULD PROBABLY MEET THE NEEDS OF THIS AREA MORE CLOSELY THAN EITHER 1 OR 3.

THE ONE REALLY NEGATIVE COMMENT IS THE AMOUNT OF LAND SLATED FOR DISPOSAL IN THE YUCCA AREA. SO MUCH PUBLIC LAND BECOMING PRIVATE LAND WOULD SEVERELY IMPACT OUR WILD LIFE, NATIVE PLANTS, AND THE QUALITY OF LIFE OF THE LOCAL

RESIDENTS. WE REALLY NEED THOSE PATCHES OF PUBLIC LAND. THEY SERVE AS IMPORTANT BUFFERS.

BY THE WAY, PERHAPS BURROS DO DAMAGE PALO VERDES, BUT I HAVE SEEN A HORNED RANGE GULL REDUCE A PALO VERDE TO A STUMP IN A MATTER OF MINUTES. I DOUBT IF THE BURROS COULD KEEP UP WITH THE CATTLE IN WREAKING THIS KIND OF DESTRUCTION. I HAVE LIVED WITH BURROS AND DO LIVE WITH CATTLE, SO I HAVE OBSERVED BOTH AND DON'T RESEMBLE EITHER. IF FURTHER COMMENT IS DESIRED, I WOULD BE HAPPY TO OBLIGE.

THANK YOU,

GEORGIA McCRAWY  
Box 35  
Yucca, AZ  
86428

75-1

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CONSULTATION AND COORDINATION

76



CITIZENS UTILITIES RURAL COMPANY, INC.  
P.O. BOX 3809 • KINGMAN, ARIZONA 86402-3809 • (602) 757-4051

April 10, 1991

Mr. Gordon Bentley  
Bureau of Land Management  
2475 Beverly  
Kingman, Arizona 86401

Re: Response to request for comments  
Kingman Resource Area R.M.P. Update

Dear Mr. Bentley:

We would like to add a proposed microwave communication site to Appendix 19 of your R.M.P. Update.

76-1

This site will be located near Valentine and will provide a microwave link to the Truxton and Valentine area. The exact site has not yet been determined but I have enclosed a map showing the proposed general area.

If you have any questions or require additional information in order to add this site to your update, please contact our Right-of-Way Dept. at (602) 757-0230.

Sincerely,

Bruce Mitchell  
Right-of-Way Supervisor

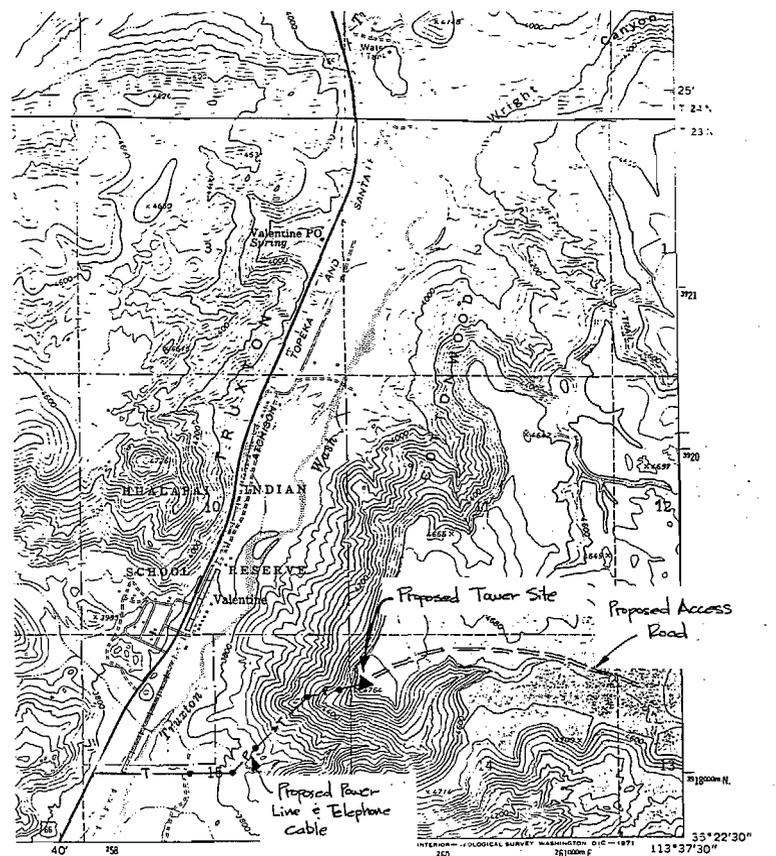
TH:vb

COM 20-02

Encl.

cc: Cathy Jensen

A SUBSIDIARY OF CITIZENS UTILITIES COMPANY  
ELECTRIC, TELEPHONE, WATER AND GAS SERVICE TO CUSTOMERS IN OVER 500 COMMUNITIES IN MANY STATES ACROSS THE NATION



Proposed Microwave Tower  
Site - C.U.R.C. Telephone  
T. 23 N., R. 08 W., S. 14  
4764' Approx. Elev.

ROAD CLASSIFICATION  
 Heavy duty ————— Light-duty —————  
 Unimproved dirt -----  
 U. S. Route

VALENTINE, ARIZ.  
N3522.5 — W11337.5/7.5

324



Cyprus Minerals Company  
9100 East Mineral Circle  
Post Office Box 3299  
Englewood, Colorado 80155  
(303) 643-5638  
Fax: (303) 643-5181

Via Overnight Express Mail

April 11, 1991

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

C. Corwin Bromley  
Attorney

Comments to the Draft Resource Management Plan/Environmental Impact Statement for the Kingman Resource Area

Cyprus Bagdad Copper Corporation (Cyprus Bagdad) would like to take this opportunity to provide the Bureau of Land Management (BLM) with written comments to the Kingman Resource Area (KRA) Draft Resource Management Plan (RMP). Transcripts of verbal comments given during the January 23, 1991 public hearing held at Bagdad, Arizona were previously provided to BLM staff on April 11, 1991 and are incorporated herein by reference.

**I. GENERAL COMMENTS**

The Bureau of Land Management has a legal mandate to manage lands under its jurisdiction on the basis of multiple use and sustained yields, balancing the economic, ecological and social interests and concerns affecting such lands. Further, as stated at page 7 of the Draft RMP, the 1872 Mining Law, The Mining and Minerals Policy Act of 1970, the Federal Land Policy and Management Act of 1976, Research and Development Act of 1980, and the National Materials and Minerals Policy all direct BLM to actively encourage and facilitate the development of public land mineral resources by private industry to satisfy local and national needs and provide for economically and environmentally sound exploration, extraction and reclamation. Congress and these Acts and Policies promote the multiple use of the public lands and recognize that mineral exploration and development is a valid beneficial use of the lands and can occur consistently with the protection of the environment and other resource uses.

Cyprus Bagdad is concerned that the RMP's Plan Alternatives 2 and 3, as presently drafted and proposed, are unsuitable in view of BLM's legal mandate, are inconsistent with the stated planning criteria set forth in the Draft RMP and are inadequately supported by the EIS. More specifically, Cyprus Bagdad is concerned with respect to extent of unnecessary and inappropriate inclusion for special management and corresponding restrictions on multiple use and mineral development in the following areas: Burro and Francis Creeks (Cultural and Riparian ACECs, Riparian

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Management and Scenic and Wild River Nomination); Desert Tortoise Habitat Boundaries and Categories and the Poachie Desert Tortoise Habitat ACEC; and the Mineral Park and Carrow-Stephens Ranch Areas (Cultural ACEC and SRMAs). Under the proposed Plan Alternatives 2 and 3, each of these special management proposals have the potential to adversely impact or conflict with Cyprus Bagdad's present and future mineral development operations, permitting plans and water rights, as well as having corresponding economic and social impacts on the the Bagdad community, as well as on the County, State and Federal levels.

Accordingly, Cyprus Bagdad respectfully requests that BLM re-evaluate the Draft RMP and issue a final KRA RMP consistent with the comments submitted herein.

**II. ISSUES OF GENERAL APPLICABILITY**

**1. THE BUREAU OF LAND MANAGEMENT'S JURISDICTION TO REGULATE STATE OR PRIVATE LAND**

All references to State or private lands within the planning jurisdiction of BLM should be removed from the RMP, as the BLM lacks jurisdiction over such lands.

Section 1701(a) of the Federal Land Policy and Management Act of 1976 ("FLPMA") directs the BLM to promptly develop regulations and management plans for the protection of public land areas of critical environmental concern. 43 U.S.C.S. § 1701(a)(11). The term "public lands" means "any land and interest in land owned by the United States within the several States and administered by [the BLM]." 43 U.S.C.S. § 1792(e). Although courts give the BLM much deference regarding the content of RMPs, the BLM's planning jurisdiction is limited to public lands. See, *Natural Resources Defence Counsel v. Hodel*, 624 F. Supp. 1045 (D. Nev. 1986); *aff'd* 819 F.2d 927 (9th Cir. 1987); *American Motorcyclist Ass'n v. Watt*, 534 F. Supp. 923 (C.D. Cal. 1981); *aff'd*, 714 F.2d 962 (9th Cir. 1983).

77-1 | The Draft RMP appears to assume that State land exchanges will occur and that management and regulation of activities will extend to State land. See RMP at pages 5, 26, 38, 40, 99-100. However, in March of 1990, the Arizona Supreme Court ruled that State land exchanges are prohibited by Article 10 of the Arizona Constitution. *Fain Land & Cattle Company v. Hassell*, 790 P.2d 242 (1990). In that case, the Supreme Court stated that the statutory framework authorizing the State to exchange State land for public or private land violates the constitutional provision which requires all sales to be at public auction. *Fain Land & Cattle Company*, 790 P.2d at 248 (1990). In response to this Supreme Court decision, the Arizona legislature proposed a constitutional amendment in favor of State land exchanges and submitted the amendment to the qualified electors in November of 1990. A majority of the qualified electors voted against the

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proposed amendment. Thus, State land exchanges are prohibited by Arizona law and should not be incorporated in the RMP.

2. OTHER ISSUES

77-2 |

In Appendix 18 on page 214, the RMP erroneously states that the Burro Creek drainage has been contaminated by mine wastes along the Creek. There is insufficient data to support the RMP's statement that heavy metal contamination "has killed invertebrates and fish in the creek and in turn has adversely impacted the rest of the food chain, particularly raptors. Such pollution also creates hazards for people engaged in water-based recreation provided by Burro Creek." Cyprus Bagdad has and will continue to conduct its mine operations in a sound environmental manner, in compliance with all applicable laws and regulations. Cyprus Bagdad requests that this language be removed from the RMP, as it is without adequate foundation and is inflammatory and inappropriate.

III. SPECIFIC SPECIAL MANAGEMENT AREA ISSUES

1. DESIGNATION OF BURRO CREEK AS A CULTURAL AND RIPARIAN ACEC, AND NOMINATION OF BURRO AND FRANCIS CREEKS FOR WILD AND SCENIC RIVER DESIGNATION

A. ACEC Designation and Riparian Habitat Management.

In designating Burro Creek as an Area of Critical Environmental Concern ("ACEC"), the stated goal of the Bureau of Land Management is "to protect and enhance riparian, threatened and endangered species, and cultural resources, emphasizing total ecosystem management." See Appendix 18, page 214. Cyprus Bagdad believes that this goal can be fully achievable without the Burro Creek ACEC designation, with controls presently existing (a majority of the land is federally owned and controlled) and by use of alternative management practices in conjunction with the State of Arizona, private owners of lands within and surrounding the proposed ACEC area and with other interested parties, each of which have already expressed a willingness to work with the BLM in achieving these goals, without requiring the undue and overly restrictive conditions which would otherwise be imposed by designation as an ACEC.

As currently drafted, the Burro Creek Cultural and Riparian ACEC would not only prohibit mineral material disposal within the full area of the ACEC, but would also require mandatory bonding and Plan of Operations for all mineral exploration and development activities within the ACEC, as well as "elsewhere", and would restrict utility corridors and off-highway vehicular traffic in the area. See RMP Table II-5 at page 55, & Appendix 18 at page 214. Cyprus Bagdad Copper Company currently disposes mineral material, or tailings, on private lands and state leased lands adjacent to the proposed ACEC boundaries of the Burro Creek

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ACEC, but not in any cultural or riparian habitat areas. Future tailings disposal site plans indicate potential extension into the proposed ACEC boundaries, as was shown in the maps previously submitted to the BLM, but again not in any cultural or riparian habitat areas. The extensive areas proposed for the Burro Creek Cultural and Riparian ACEC designation in Alternative 2 and 3 of the RMP, and their potential effect outside the actual boundaries on permitting and operations, have the potential to severely restrict Cyprus Bagdad's operations and continued existence, without any corresponding benefit or achievement of the stated goals of the designation.

With respect to the need for designation of the Burro Creek ACEC or the Burro and Francis Creek nominations for Wild and Scenic River designation, cultural resources and riparian habitat protection should not in any way be affected by Cyprus Bagdad's operations. Cyprus Bagdad's operations are designed to avoid adverse impacts on water quality, avoid alteration of the free-flowing nature of creeks, and minimize future shoreline developments. If development of future tailings is of concern, Cyprus Bagdad has previously demonstrated willingness and ability to effectively stabilize inactive tailings ponds. During the late 1970's, Cyprus Bagdad voluntarily established a self-perpetuating and effective vegetative cover on the Kimberly Tailings that has successfully controlled erosion. The vegetation growing on the Kimberly Tailings is healthy and vigorous to this day. If water quality in Burro Creek and its tributaries is of concern, Cyprus Bagdad operates and maintains a network of collection ponds, pumpbacks with backup generators, a lined flood control basin, ditches, and other controls to prevent water discharges into surrounding streams. In other words, the tailings ponds and leach system are designed as a closed circuit that captures and recycles the water before it exits the property. Furthermore, Cyprus Bagdad operates the tailings pond and leach system in accordance with our National Pollutant Discharge Elimination System (NPDES) Permit and submits monthly reports documenting compliance to the Environmental Protection Agency (EPA) and Arizona Department of Environmental Quality (ADEQ).

Cyprus Bagdad agrees that it is important to protect sensitive resources and supports the Cliffrose and Black Butte ACECs. Cyprus also supports the protection and management of riparian habitat areas on Burro Creek, but believes that this habitat can be fully protected with existing controls and alternative management plans of cooperation. Designation as an ACEC and the corresponding restrictions on multiple use of the incorporated and surrounding lands unnecessarily conflict with Cyprus Bagdad's continued operations and is inconsistent with the stated goals and planning criteria set forth in the RMP for the ACEC.

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B. Nomination of Burro Creek and Francis Creek for Designation as Wild and Scenic Rivers.

The Draft RMP has proposed that Francis Creek and Burro Creek be nominated for designation as Wild and Scenic Rivers pursuant to the Wild and Scenic River Act, 16 U.S.C.S. §§ 1271, et. seq. The foregoing comments regarding general issues and the Burro Creek ACEC have applicability to this proposed nomination and are incorporated herein.

To be eligible for designation as a Wild and Scenic River, the "rivers" or segments thereof must be "free-flowing" and possess outstandingly remarkable scenic, recreational, geological, fish and wildlife, historic, cultural or other similar values. 16 U.S.C.S. § 1286(a). A "free-flowing" river is one that is "flowing free of the influence of dams or other major man-made alterations . . ." See 43 C.F.R. § 8351.0-6(b). A "river" is defined as a "flowing body of water . . ." (Emphasis added). 16 U.S.C.S. § 1286(a).

The RMP inaccurately describes the entire Francis Creek and Burro Creek as "free-flowing perennial streams with outstanding scenic qualities including riparian vegetation, cliffs, and largely undeveloped shorelines uncluttered by the activities of man." See Appendix 18, page 213. Contrary to this description, portions of Francis Creek and Burro Creek are intermittent in nature and do not "flow" during certain seasons of the year, and thus may not be within the definition of a "river" under the Act.

Additionally, the shorelines are not "largely undeveloped", so as to support a Scenic River Area designation. See, 16 U.S.C.S. § 1273(b)(2). The Cyprus Bagdad mining operation has existed for decades, making use of Burro Creek and Francis Creek water and conducting mining operations above the shoreline of the proposed Wild and Scenic Rivers. The present tailings are fully visible from the central segment of Burro Creek, and future planned tailings areas will likewise be visible. Moreover, Cyprus Bagdad is concerned about its existing utility facilities which cross both Burro Creek and Francis Creek. These utilities are critical to the Bagdad mine and community, are visible from the river, and require access in order to operate, maintain, upgrade and potentially replace the existing utility lines. These existing lines may also constitute an obstruction to the "free-flowing" requirement for designation of a Wild and Scenic River.

Because Francis Creek and Burro Creek do not meet the criteria for designation as Wild and Scenic Rivers, Cyprus Bagdad requests that the nominations, if any, be limited to an area that precludes individuals from viewing the tailings of the Cyprus Bagdad mining operation, and which is not impaired by Cyprus' use of existing utility corridors. Alternatively, Cyprus Bagdad requests that language be inserted in the final RMP that reflects

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the ineligibility issues identified above, that expressly recognizes the utility corridors as necessary and allowable, that permits the upgrade of the utility facilities within any Wild and Scenic River designation areas for Burro Creek and Francis Creek, and that permits mineral development in the areas presently used and those planned for the future, both during any study period and after any designation.

3. THE DESERT TORTOISE HABITAT BOUNDARIES AND CATEGORIES/ ACEC DESIGNATION REQUIRES FURTHER STUDY

The Draft RMP states in Appendix 6 at page 169 that "a suitable habitat for the desert tortoise is abundant" in the RMP study area. Cyprus Bagdad agrees that there is abundant habitat in the RMP study area, as well as a potentially large population of desert tortoise. The suitable habitat and proposed habitat boundaries and categorizations for the desert tortoise, however, were arbitrarily drawn. The data collected to determine the Poachie Desert Tortoise ACEC and other habitat boundaries and categories of the desert tortoise is insufficient to justify the proposed habitat boundaries.

Cyprus Bagdad supports the BLM in management of lands to protect the desert tortoise and its habitat, but sound scientific data must be used in defining areas essential to the perpetuation of this species, in order to ensure balanced and reasonable multiple use of public lands. Further studies regarding the extent of the desert tortoise population and habitat are necessary before establishment of boundaries which arbitrarily restrict other compatible and beneficial uses of public lands and resources.

Cyprus Bagdad will offer its cooperation in any studies or other efforts of the BLM with respect to the desert tortoise, but believes the RMP's proposed boundaries and categories are unsuitable, have insufficient support in the EIS and other studies, and unduly restrict use of public lands. The Category II Desert Tortoise areas shown in the RMP include approximately 400 acres of Cyprus Bagdad's active tailings area and an additional 300 acres previously approved for tailings deposition under a Plan of Operations issued to Cyprus Bagdad by the Arizona State Land Department. An additional 800 acres of State land included within Category II Desert Tortoise boundaries are being considered for future tailings sites. Cyprus Bagdad respectfully requests that the boundaries in the Poachie and Bagdad public land areas be re-evaluated with respect to conflict resolvability and amended to non-categorized or Category III, until further studies have been completed justifying otherwise, and that mitigation procedures be considered. Additionally, the RMP should also be amended to exclude private and state lands and cover only public lands until further studies are completed.

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4. MINERAL PARK SRMA AND CARROW-STEPHENS RANCH ACEC AND SRMA

77-7

The RMP has proposed a Special Recreation Management Area (SRMA) for the "Mineral Park Historic Mining Area". The proposed area for this SRMA is located upon patented fee land owned by Cyprus Mineral Park Corporation, and the mine located within in this area is in active operation. The mining operations are inconsistent with a SRMA area designation and development of same would pose a danger to the public. Accordingly, Cyprus urges that the Mineral Park Historic Mining Area SRMA be deleted.

The proposed Carrow-Stephens Ranches ACEC and SRMA incorporates lands east of Highway 93 and the Big Sandy River, portions of which are fee-owned by Cyprus and the ACEC extends over an existing well field and pipeline network owned and used by Cyprus Bagdad for its water supply. Access to the wells and pipeline for maintenance purposes is conducted off existing roads and trails by off-highway vehicles. Table II-5 at page 53 of the RMP indicates that right of ways are to be limited to the area west of Highway 93. OHVs will be limited to existing roads and trails, and that the BLM will file for water rights on springs and for instream flow. While Cyprus Bagdad generally supports the Carrow-Stephens Ranches SRMA, to avoid conflict, Cyprus Bagdad urges that the Carrow-Stephens Ranches ACEC and SRMA boundaries in the final RMP be confined to the areas west of the Big Sandy River, (Cyprus Bagdad is willing to continue management practices on its property to achieve substantial consistency with protection and preservation of resources), and urges that any water rights sought by BLM are limited to the water needed for the actual ranch and SRMA, and are consistent with Cyprus Bagdad's existing water rights and use. Additionally, Cyprus is interested and is willing to discuss land exchanges with BLM in order for BLM to obtain a contiguous area of land for its SRMA.

IV. CONCLUSION

Cyprus Bagdad appreciates the opportunity to comment on the KRA Draft RMP. Of the 2.5 million acres in the Kingman Resource Area, Cyprus Bagdad will require only 4,600 Acres, which is only 0.2% of the Kingman Resource Area, for present and future operations and tailings ponds over the remaining 35-year mine life. Of these 4,600 acres, only 2,400 acres, which is only 0.1% of the 2.5 million acres in the KRA, conflict with the Special Management Areas and Category II Desert Tortoise Management Areas proposed under Alternatives 2 and 3. Considering the small percentage of the Special Management Areas proposed under Alternatives 2 and 3 that conflict with the present and future operations and tailings sites, and the importance of these areas to the continued operation of Cyprus Bagdad beyond the next 10 years, Cyprus Bagdad hopes that BLM will reconsider many of the Draft RMP's positions to be more consistent with the multiple use policy, stated planning criteria and these comments.

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Should you have any questions concerning these comments, please do not hesitate to contact me.

Sincerely,

*C. C. Bromley*  
C. C. Bromley

cc: Henri R. Bisson  
Elaine F. Marquis  
Distribution List

R.M.P. COMMENTS MIKE GROSS AND NORMA GROSS  
RANCHERS OF THE CURTAIN AND MINERAL PARK ALLOTMENTS

I am going to comment on the allotments that's affecting my operation then I am going to comment on other areas that may affect the ranching industry.

The most critical affect that would cause me problems with my operation of the Curtain and Mineral Park Allotments would be the Land Disposals or Land Trades. My family had some discussion with the BLM Officials about these possible Land Disposals and Trades. At this time it was just a feeling out process. I've done alot of thinking on this, here are some of my opinions. First of all I don't think this ought to be consider for land disposal or trade. I have many reasons for this. There is so much land in the disposal areas in Golden Valley that isn't near fully develop. Why should the allotments be put up for disposals or trade when there is so much land in the disposal areas that isn't develop. There is a good block of land with the 30 sections in the Mud Springs Allotment and Curtain Allotment that would give BLM a good management area. For many uses like ranching, wildlife, and recreation. My family has been ranchers that's trying to improve the ranges with good management. The proof of this is that we are the only ranch in the K.R.A. that is practicing Holistic Resource Management. BLM and my family has put lots of time and money into this project. It would be ashame not to see what this kind of Range Management would do. If the land disposals or trades took affect we would never know the results that this could have on improving range conditions in this area. We are showing signs of improving conditions but it has been slow due to the drought conditions we've been face with the last five years. One major aspect that has accure with this kind of management is the increase in numbers of cattle, from the conventional way of grazing. Also the wildlife species are on the increase, mainly the quail. I had many comments from hunters about the quail, they said that this area has been the only place with any numbers of quail than any other areas that they hunted. This may be a good sign that we are doing some good with this kind of range management.

This isn't the only reasons why we went to Holistic Resource Management. Something I have seen in this kind of Range Management that I haven't seen in other Range Management System in the K.R.A. is the closeness of people. We have a very good management team form up of many interest groups. I don't think I would benefit any by going to another Land Agency. Since my family and BLM started this project I would still like to work with BLM. Why, my family and BLM took on this kind of range management is to improve the plant species and water cycle. Also to improve

profitable for my family and improve wildlife habitit. Just by improving the water cycle is going to benefit every one in Golden Valley, since all of the water comes from under ground reservoir. People also needs open space to get out in. For getting away from closed in develop areas, for recreation, for feeling apart of the land. These are my reasons why the allotments I operate on shouldn't go into the Land Disposal or Trades in the next 20 year R.M.F...

Another critical affect is going to be the wild horses in the Cerbat Mountains which Mineral Park Allotment is part of. Not only is it going to effect my operation also many other allotments. More so in the Mount Tipton Allotment. I know there is going to be wild horses, that I can accept. But not the numbers that is plan for at this time. My understanding there is plans to manage about 90 to 110 head of horses. This is way to many considering back in 1973 when the Wild Horses and Burros Act took affect it was only 14 head. Why a big increase? Our allotment doesn't get increase with cattle like that. If anything I fear a decrease in cattle numbers with the increase in horses.

Another specis its going to effect is the Mule Deer population. My opinion is the Cerbats has probably the best herd of Mule Deer than anywhere else in the K.R.A... I am not against an increase in horses, but there got to be an understanding numbers that won't affect my operation and other allotments. I am willing and probably most other permits that Wild Horses affect would sit down with the BLM and Wild Horse Interest Groups and come to an understanding numbers and management system. The horses that are there now are not managed. I have seen many In-breed Horses, and many old and sick looking horses. The horses are starting to roam into areas that I haven't seen horses in all of the years that I been in the ranching business. In the drought periods I seen horses down on the flats looking for feed and water. The numbers that are there now is to many for what I consider a manageaable numbers.

There are the two important effects that will have an impact on my operation on the Curtain and Mineral Park Allotments, that my family grazes cattle on. Here are my comments on areas that will affect cattle grazing in general.

First of all the R.M.P. Draft doesn't give very good details on grazing in these areas. That I am going to comment on such as; How is grazing going to be handle in critical areas, in Ripainan Areas and places where Desert Tortoise Habit.

I am going to start with the AC's and EC's. My feeling and many others is in the R.P.M. Draft nothing is mention about grazing in these areas. The feeling that I get is

grazing is going to be eliminated from these areas that are listed as critical. With my experience with Holitic Management grazing is a major effect for healing these lands if they are properly managed. It would be a terrible mistake not allowing grazing in these areas of critical concerns. I am also confused why these areas are listed as critical. Is all our land a critical concern? Why list these areas if only proper management would cure the problem to start with. If the Environmentally Impact Statements in our grazing regulations were implemented at the beginning there wouldn't be problems with the areas that are listed as critical. Bottom line is proper management with cattle grazing included.

The Riparian Areas is the most talked about with every Land Agency and Interest Group than any other areas. This is going to be a very tough area to manage with all of the private lands involved and the down stream water users. But the most effected is going to be the Livestock Grazers. Why, because every Land Agency and Interest Group are blaming the Livestock Grazing for the deterioration of the Riparian Areas. I think there is many other effects first. Lets take a look why. The drought is got to be a major effect with the amount of rain fall that has acquired in the last 5 years got to put a damper on the amount of water in these areas. Flooding also is effected. Look what happen to Burro Creek. Look what happen after proper management with livestock grazing done afterwards. These two effects is uncontrollable. But livestock shouldn't get all the blame.

Now, another effect that may be most destructive of all and is controllable is the water users. There are so many groups such as cities, mining, and farming that wants to take control of these areas only for the water. But the first thing that happens when people don't see anything growing either up stream or down stream is that livestock grazing is the problem. They don't think about all the water that's being pump out of the ground to supply all of the water users. I think stricter managing of the Riparian areas is going to put a burden on the rancher without help from our Land Agencies with Funds. The extra waters and fencing that's going to be needed. Also extra time managing the cattle. The management plan also could be a problem if not put together properly. I am for management but only if it done with lots of input and reasoning. I think a separate fund should be set aside from our Government to help the ranchers with funding for the extra waters and fencing and for any other unseen expenses. When I read articles about the Riparian Areas and reasons for there deteriorating overgrazing is always mention as the main cause. I think this is a false statement when many other effects can cause deterioration. In my opinion this is going to be a tough task for all affected groups to agree

on. How to manage these Riparian Areas. Know one has a good description of an Riparian Area. Many tried and every Land Agency or Interest Group has there own why of describing a Riparian Areas. Livestock Grazing should be included as a main tool in bringing back these Riparian Areas. Also, how is wildlife going to be managed in these areas. Wildlife are grazers too. There's so many variables and question that needs to be study before anyone can even start to managing these areas.

I think the Desert Tortoise is an effect that's got started from interest groups that wants to eliminate livestock grazing all together four or five years ago. Nothing wasn't hardly mention about Desert Tortoises then all of sudden it was brought on the National scene overnight. Some interest groups says this is a good way to eliminate livestock grazing. Put it on the Endanger Species List. There hasn't been any proven data on livestock grazing in Desert Tortoise Habitat to make a fair assessment. I don't think livestock grazing has any effects on Desert Tortoises. The biggest problem that faces Tortoises is predators and population growth. What I read about Tortoises is they come out when everything is green and flush. In that case there is more than enough forage for tortoises and cattle. People say they don't see tortoises all the time. How can they when tortoise spends 90% of its time in burrows. This is not a fair statement that there are not any tortoises. I think it would be a mistake to eliminate cattle grazing or cutting numbers. I don't believe cattle are overgrazing the Desert Tortoises Habitat that's being written in every article about the Tortoises. Cattle are not enemies of the Tortoises. Tortoises main enemies are predators and population growth. Over all, on all of my comments, livestock grazing is being blame for all the problems that special interest groups are saying, "Why the lands is deteriorating." This is very misleading. There's got to be a better education why livestock grazing is very important to our lands

Thank you

Mike Gross  
Rancher in the K.R.A.

**OFFICERS**  
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April 11, 1991

Mr. Bill Carter  
 Bureau of Land Management  
 Kingman Resource Area Office  
 2475 Beverly Avenue  
 Kingman, AZ 86401

Dear Mr. Carter:

Thank you for the opportunity to respond to the Kingman Resource Management Plan and Environmental Impact Statement draft.

In general observation of the entire plan, I have noticed an abyss of negativity in areas related to wild horses and burros. This negativity is deceptive and unfounded and leads to corrosion of trust and credibility of the BLM. It also creates an atmosphere of aversion to the Wild Horse and Burro program by employees and other parties who read the plan. It also adds fuel to the fire of those who are already species prejudice.

I encourage you to speak objectively about the Wild Horse and Burro program as you do your Wildlife program. There is no doubt that words create reality. The Wild Horse and Burro program is one of the most potentially positive programs that the BLM has.

You have stated that tourism may well become the number one industry of Mohave County. I would like to encourage you to include wild horses and burros in your recreation plan as watchable wildlife. The cost would be minimal with a few road signs to notify the public. By December, a book will be published showing HMAs and areas where tourists can view wild horses and burros. I would be happy to give you the necessary information so that Mohave County can be listed in this book. There is a growing demand for this, especially, by international travelers.

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 Velma B. Johnston  
 (Wild Horse Artist)  
 Lora Tolarski

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**PLAN ALTERNATIVES:**

Pages 24/25; Wild and Free Roaming Horse and Burro Management

- 79-1 | "made BLM responsible" has a very negative effect to mean that BLM was forced to do this. More positive wording would be "gives BLM the responsibility".
- 79-2 | "disposal" should be changed to "placement"
- 79-3 | "Horses and burros should be maintained at the lowest level needed". This statement is in direct opposition to Public Law 92-195. In the IBLA decision 88-678, appropriate management level (AML) was defined as "the optimum number of wild horses and burros that results in a thriving natural ecological balance and avoids a deterioration of the range".

AMLS set in the Black Mountains (400) and Big Sandy (135) were established in the Management Framework Plan (MFP) and were not established through monitoring by determining optimum levels; therefore, those numbers are not in accordance with the law. IBLA's decision, 88-678, states the following: "An appropriate management level established purely for administrative reasons because it was the level of wild horse use at a particular point in time cannot be sustained under 16 U.S.C. § 1333 (b)(2) (1982). The statute does not authorize the removal of wild horses to achieve an appropriate management level which was established for administrative reasons rather than in terms of the optimum number of animals which results in a thriving natural ecological balance and avoids a deterioration of the range."

79-4

**ALTERNATIVE I:**

Page 33; Big Game

- 79-5 | "lowest" possible number must be changed to "optimum".

Stated in this paragraph is "to mitigate impacts to bighorn sheep habitat" when actually quite the reverse should be the case. Bighorn sheep numbers should be managed to mitigate impacts to wild burro habitat. Introduction of Bighorn sheep into burro habitat has created serious conflict and disregard for Public Law 92-195 which protects wild horses and burros. Declaration statements by Don Martin, sports writer for a local paper, to the National Wild Horse and Burro Advisory Board's February '91 meeting clearly

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highlighted this conflict. He stated, "In the past 20 years, over 10,000 burros have been shot". He further explained that the deaths of the 54 burros in the Black Mountains were done by amateurs because professionals would only kill two to three burros at one time. The conclusion is that no suspicion of foul play would be aroused when smaller numbers would be eradicated.

79-6

The law does not imply that "burro numbers will be set at a level to protect the natural ecological balance of all wildlife species using the land". This unfounded statement again appears on page 35 under Wild Horse and Burro Management Objectives. Burro numbers must be set at optimum levels determined by monitoring. The law further define their range as the "amount of land necessary to sustain existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for public lands". (Principally is defined as chiefly; mainly; above all; according to Webster's new 20th century dictionary.)

ISPMB will not support Alternative I

ALTERNATIVE II:

Page 59; Wild Horse and Burro Management

79-7

Increased forage resulting from improved habitat should be allocated fairly to all wildlife species, including wild horses and burros. Public Law 92-195 states, "Any adjustments in forage allocations on any such lands shall take into consideration the needs of other wildlife species WHICH INHABIT such lands." Consideration means thoughtful regard for others and it does not mean at the expense of the party who does the considering.

79-8

In regard to the Cer bat Wild Horse herd, 90 does not constitute a viable herd. On page 117, viable horse herds are at least 120 animals.

This Cer bat Herd is unique in its genetic characteristics as stated by Dr. Gus Cothran of the University of Kentucky. Because of their unique characteristics, history, and genetic features, this herd should be declared an Area of Critical Environmental Concern (ACEC). More research will be coming from Dr. Cothran. This area should have closure to grazing of feral horses and burros.

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79-9

Deer populations of 875 on Cer bat mountain island are in excess according to the Cer bat/Black Mt. Grazing EIS. Deer populations should be approximately 200. There is no mention about reducing deer population, only inference that degradation of the range will happen if we wait for monitoring studies (page 138). The determination of 14 horses was an administrative decision in the MFP and therefore is invalid. The lack of mentioning an excess of 675 deer creates a void of trust and credibility with the BLM. It also appears that this RMP favors other wildlife over wild horses and burros.

79-10

Utilization levels for wild horse and burro use should not be at 30%, unless it is to be used for a specific unique purpose such as improving riparian habitat or changing the ecological condition status from early to mid or mid to high seral for a particular reason. You will need to show what type of criteria determines this such as: the amount of ground litter, frequency and composition, and diversity so that at the end of the stated time frame, you will know whether objectives have been met. If the objectives have been met at the time of the evaluation, then it would no longer be necessary to reduce grazing pressure from horses. The important factors are: having a specific objective, monitoring at regular intervals to determine if objectives have been met, determining where horses graze and numbers and seasons of use, and choosing a key area carefully that actually measures the impact of the horses on their habitat, and if other wildlife species inhabit the area than utilization of forage must also be limited to 30% for them, as well as any other user.

Although Alternative II is better than Alternative I or III, it still is not satisfactory for Wild Horse and Burro management and is in opposition to the 1971 law to protect wild horses and burros. ISPMB cannot support this Alternative unless satisfactory changes are made.

ALTERNATIVE III:

Page 78; Wild Horse and Burro Management

79-11

The Cer bat horses represent a unique herd of wild horses both historically and genetically. The number set in the MFP for 14 horses does not constitute a viable population nor is it in accordance with the 1971 law and the IBLA decision 88-678 as previously stated on page 2.

ISPMB strongly objects to Alternative III

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COMMENTS TO THE EIS:

Page 106: Rangeland

While I-C-M categorization appears to favor forage production, ISPMB encourages the BLM to look carefully at the ecosystem in terms of damage and degradation.

**79-12** | You have defined 83 grazing allotments, however your charts only show 82.

Page 117: Cer bat HMA

We agree that the Cer oat herd must be preserved because of their uniqueness. We believe that a viable population is 120 animals. Policy has not been approved to manipulate population through age and sex ratios. This is experimental and not proven.

**79-13** | The statement "to correct overobligation of forage" is inaccurate. Monitoring has not been carried out in the Cer bats and therefore this would fall under an administrative decision.

It is very important that the Cer bat herd be determined as an ACEC.

Page 123: Wild Free-Roaming Horse and Burro Mgm.

We agree that any concentration of animals in one area could degrade watershed conditions; however, under good management this will not happen.

Page 128 Wild Horse and Burro Mgm.

**79-14** | We agree that dispersed populations of animals at a light stocking rate will improve habitat. We believe that numbers must be set on Bighorn sheep and monitoring must be done to assure utilization levels are met for that range. Increased forage production must be shared by all users of the range.

**79-15** | The statement, "presence of large introduced, exotic species" is an affront to wild horse and burro advocates. Its use jeopardizes any efforts to resolve the continuing controversy between users of public lands. It greatly destroys the credibility of the BLM and erodes any trust.

Again, good management will not allow degradation of habitat.

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Page 129 Wild Horse and Burro Management

**79-16** | Concentrations of any animal will have an adverse affect on the environment. Under good management this will not happen. This statement is totally inappropriate.

Page 130 Cerbat HMA

**79-17** | This is a very true statement but needs to be applied to all animals using public lands. Boom or bust populations of any animal will create degradation to the environment. ISPMB demands that the BLM applies this philosophy to all wildlife.

Page 138 Wild Horse and Burro Management

**79-18** | Again this entire section is unfounded. Numbers of horses must be optimum. Monitoring is required by law. No mention has been made that deer population is in excess of 675 animals. Horses are made the scapegoat once again.

Page 140 Cerbat HMA

**79-19** | This is an untrue statement. Monitoring is required by law. Provisions are made within the law that requires the BLM to manage optimum numbers which will not result in deterioration of the range...

Page 145 Wild Horse and Burro Management

**79-20** | Eliminating wild horses when historically they have occupied a range prior to 1971 is against the 1971 law.

Page 146 Wild Horse and Burro Mgm

**79-21** | This statement is unproven because monitoring studies are lacking to prove it. Overgrazing if caused by cattle would not improve if horses were removed.

SUMMARY:

ISPMB is greatly concerned by the overall negativity that this plan has for wild horses and burros. We cannot support such a plan.

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CONSULTATION AND COORDINATION

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SUMMARY: CONT.

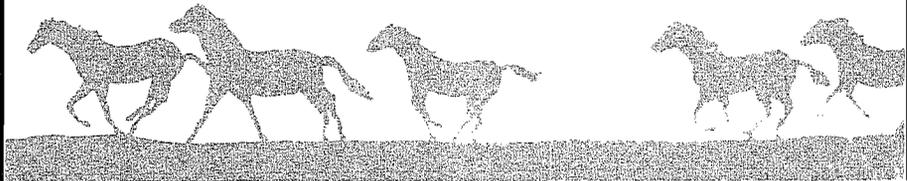
These are our following recommendations which we urge you to incorporated into the final RMP:

1. That the plan be written in accordance with the 1971 law amended, protecting wild horses and burros.
2. That the language regarding wild horses and burros be written in a positive manner which would reduce conflict and improve trust and credibility with the BLM.
3. That boom or bust populations of wildlife be prohibited and that utilization levels are enforced for all users.
4. That wild horses and burros be included in your recreation plan as watchable wildlife in areas prescribed by the Wild Horse and Burro Specialist.
5. That increased forage production be allocated fairly. Multiple Use precludes the increase of forage production for one species.
6. That the Cerbat Wild Horses HMA become an ACEC.
7. That reduction of deer population in the Cerbat mountain island be addressed.
8. That further clarification of reduction of utilization to 30% be addressed.
9. That statements which are unfounded be removed.
10. That the term "exotic species" not be used in reference to wild horses and burros. (Current research may now prove that horses never disappeared off the American continent).
11. That closure to livestock 4710.5 be enforced if conditions warrant in the Cerbat area.

Sincerely,

Ms. Karen A. Sussman  
President, ISPMB

cc: Mr. Les Rosenkrance, State Director  
Mr. Michael Penfold, Assistant to the Director  
Mr. John Boyles, Chief, Wild Horses and Burros



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April 10, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly  
Kingman, AZ 86401

Dear Elaine,

Thinking how to comment on the Kingman Resource Area Resource Management Plan, I reflect upon my experience with the evolution of planning over 27 years with the BLM. As I remember, planning in 1963 was on the basis of watershed areas. After that we went to describing planning units by physical boundaries (highways, mountain tops, railroads, etc.). I guess this better suited management needs from a political or ease of access viewpoint. Who knows? Then in the late 60's and throughout the 70's, we were in the Unit Resource Analysis and Management Framework Plan phase. Then in the 80's and on into the 90's, the Management Situation Analysis and Resource Management Plan phase was implemented.

I can remember saying to myself and probably others--Are we ever going to finish planning?? Of course the answer is no. To plan and replan is a necessity for all organizations from the family, to government, to the large corporation. It just seems the BLM has made the process extremely complicated. I always felt the old watershed plans made sense and I still do.

My frustration level since the coming of Management Framework plans has been high. Knowing the need for planning is one thing but having it drive you nuts is another. So what was bothering me. Yes, management of natural resources is complex. Yes, we had plenty of valuable data about each resource. Yes, we had knowledgeable, professional people to do the planning. Yet, when we got to that "spaghetti" overlay trying to mesh all the resource needs together into a plan of management, I felt totally frustrated. Something is wrong with a system where achieving the final solution is so cumbersome. And yet, inter-disciplinary sounds so good! That is the question that has been bugging me: and until recently eluded me. I only knew I was frustrated with the process. Planning should be simple and relatively easy, not complex and cumbersome. If anyone questions the complex and cumbersome statement, ask any stranger to read virtually any RMP Draft and observe his response.

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The inter-disciplinary team approach to planning for any ecosystem does not work because this approach fails to deal with a basic premise on which every ecosystem operates. That is the fact that the ecosystem is holistic. But don't take my word for it. Here is what two respected scientists had to say. In 1959 Eugene P. Odum wrote:

"I am more convinced than ever that the "ecosystem" or "whole-before-the-parts" approach with its functional emphasis is sound because it avoids several stumbling blocks which can make the presentation of ecology either to students or to scientists in other fields very difficult. That is to say, the reverse approach, which starts with individual environmental factors or organisms, often bogs down in details of description, sampling methodology and taxonomy; such details, of course, are vitally important in the carrying out of specific investigations, but they need not obscure the presentation of principles which must be understood by the beginner before he can possibly design research of his own or judge critically the work of others."<sup>1</sup>

"Probably the most important job in conservation for the immediate future is to establish the fact in the minds of the general public that man is a part of a complex environment which must be studied, treated, and modified as a whole and not on the basis of isolated 'projects.'"<sup>2</sup>

In 1941 Aldo Leopold wrote:

"Mechanized man, having rebuilt the landscape, is now rebuilding the waters. The sober citizen who would never submit his watch or his motor to amateur tamperings freely submits his lakes to drainings, fillings, dredgings, pollutions, stabilizations, mosquito control, algae control, swimmer's itch control, and the planting of any fish able to swim. So also with rivers. We constrict them with levees and dams, and then flush them with dredgings, channelizations and floods and silt of bad farming.

<sup>1</sup>Eugene P. Odum, Fundamentals of Ecology, p. VI.  
<sup>2</sup>IBID, p. 422.

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"The willingness of the public to accept and pay for these contradictory tamperings with the natural order arises, I think, from at least three fallacies in thought. First, each of these tamperings is regarded as a separate project because it is carried out by a separate bureau or profession, and as expertly executed because its proponents are trained, each in his own narrow field. The public does not know that bureaus and professions may cancel one another, and that expertness may cancel understanding. Second, any constructed mechanism is assumed to be superior to a natural one. Steel and concrete have wrought much good, therefore anything built with them must be good. Third, we perceive organic behavior only in those organisms which we have built. We know that engines and governments are organisms; that tampering with a part may affect the whole. We do not yet know that this is true of soils and water.

"Thus men too wise to tolerate hasty tinkering with our political constitution accept without a qualm the most radical amendment to our biotic constitution."

I know these quotes are lengthy, and I apologize, but they necessarily illustrate my point. The reverse approach to Holism discussed by Odum quite accurately describes the Bureau's Planning System.

Further, his concern for "the most important job in conservation for the immediate future," has 32 years later, yet to be accomplished. It is not just the general public but a large percentage of the resource management professionals that still do not understand that "man is a part of a complex environment which must be studied, treated, and modified as a whole."

I believe the reason the Bureau is still bogged down in details of a complex planning system stems, previously, from a lack of an alternative means of analyzing and managing the great complexity of the ecosystem, combined with a lack of broadbased understanding and belief in Holism by Bureau employees. This is totally understandable and perhaps we have not reached the point in our paradigm where we can go forward. But we won't know that unless someone asks.

IBID, p. 422, 423.

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Therefore, through these comments, I am asking the BLM in Kingman, Arizona, to step out of their paradigm of "parts before the whole" management and step forward to show the rest of the Bureau and others how to plan and manage Holistically. This would have been impossible ten years ago or probably five years ago, but it is possible today and in fact resource needs demand it. It is possible today because The Center for Holistic Resource Management has provided the tools necessary to enable us to view a complex ecosystem in a manner that focuses on the issues at hand without getting bogged down in detail. This is accomplished through the use of a Holistic Resource Management Model and an understanding of why management must be Holistic. (Read Chapter 4 of Holistic Resource Management by Allan Savory, especially the caption under Plates 1-4.)

I equate the inter-disciplinary approach to a family driving down the road with no destination (no goal) in mind and each member arguing about where they ought to go versus a Holistic approach where they all know Grandma's house is the destination (goal) and all agree that that is where they are going. They may go slower, faster, take a different route than normal, but they eventually get to Grandma's house. In other words, you have to know where you are going before you can decide how to get there. That illustration defines a basic flaw in the inter-disciplinary approach to resource management planning. Knowledgeable and dedicated resource specialists are asked to engage in three years of planning before management decides to let them know where they are going with a plan. How much better it will work when the goal is determined first and the resource specialists can concentrate their knowledge and expertise in mapping the best way to get there. This, in part, is how Holistic Management differs from conventional management.

Of course, it is too late to make this RMP Holistic in nature, but what can be done is to modify the end result and introduce Holistic Management as a planning and action tool to get the job done on the ground. For example, the end result of the RMP as it stands now will be the implementation of Allotment Management Plans, Wildlife Habitat Management Plans, Wild Horse and Burro Management Plans, Wilderness Management Plans, etc. How much better and simpler it would be to have only one Holistic Plan for a particular unit of land (whole).

The Whole I'm suggesting for management as a pilot project is the Sacramento Valley Watershed. The decision in the RMP would be to manage this area Holistically. You would be starting from scratch regarding planning for this particular Whole. This would require a concentrated effort and much commitment and support by the BLM for the concept. Also, this would entail the co-ordination with City, County, State, Landowners, and all citizens living within this area. With the current Community Unity push by the City and County, and the fact that Kingman's mayor is right now attending the

Ms. Elaine Marquis  
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Introductory Holistic Management Course, this could be an opportune time to launch such an initiative. I would not even suggest such an endeavor unless the Bureau would be willing to enlist the aid of The Center for Holistic Resource Management. Getting such a program done right would be a must or not start it at all.

The reason I suggest Sacramento Valley as the place to start is because of the rapidly expanding population with associated resource problems. Proper management of all the resources in that Valley should be important to all and goes back to Odum's thought about the most important job in conservation is to establish the need to manage the whole in the minds of the general public. What a better place to start than Sacramento Valley. Tackle the tough one first.

Elaine, on a personal note, I sincerely hope you will give my suggestion careful consideration. Such a bold move would pay dividends to the Bureau, not only in improved resource management, but in good public relations, and a realization in the public's mind that the BLM is an organization that gets the job done right. In all my years with the Bureau, I was always proud to be associated with a great organization. Although I do admit in recent times the coming of uniforms and the seemingly increased preservationist tendencies of some of the folks had me spooked.

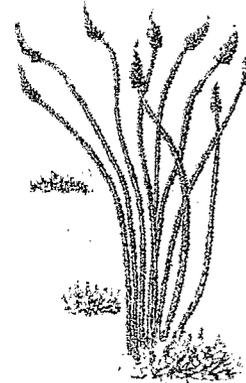
Holistic Management is the wave of the future, and the sooner the BLM gets on track the sooner they will be recognized as the leader in Natural Resource Management Planning worldwide.

Thanks for the opportunity to comment on this RMP.

Sincerely,

  
Elno Roundy

1 of 2 Comment Letters/KRA/RMP/1991



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April 11, 1991

Ms. Elaine Marquis, Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Elaine,

This is my second comment letter on the RMP. The first, as you know, dealt with Holistic Management, the importance of which goes way beyond what I may personally feel. I felt that issue should stand on its own merit, therefore the separate letter.

This comment letter will be specific to a few issues I personally feel should be considered in the final draft of the RMP.

Range Management

I realize the grazing program developed as a result of the two grazing EIS's were incorporated by reference as a part of Alternative 1, and I think this is great. We had a long, tough fight to get this program going and it was proper not to resurface this issue as a part of the RMP/EIS.

Since the grazing program is part of Alternative 1, it follows that the benefits of an implemented grazing program should be documented in the Environmental Consequences Chapter. This does not appear to be the case. Rather the adverse impacts of not implementing the grazing program on schedule were identified. I believe the benefits should be added.

ACEC's (Riparian/Tortoise/Bighorn Sheep)

Grazing management is essentially vegetation management and therefore the benefits of an implemented livestock grazing program in Alternative 1 will solve the habitat problems which the resource specialists evidently feel necessitated proposing Riparian, Tortoise, and Bighorn Sheep ACEC's in Alternatives 2 and 3.

81-1

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Further, I do not feel a careful reading of the definition of ACEC's in the Act or in the regulations support these particular designations. I suggest a reassessment based on the written criteria in BLM files.

I recommend the following ACEC's be dropped from consideration:

Black Mountain  
Wright Creek & Cottonwood  
Cherokee Point  
McCracken  
Poachie  
Burro Creek  
Aubrey Peak

I concur with the following ACEC's:

Western Bajada  
Hualapai Mountain  
Carrow-Stephens Ranches  
Silver Creek  
Black Butte

Vegetative Products

I strongly support private woodcutting on public land and ask that this use be provided for in the final draft. Woodcutters are KRA's single largest constituency with maybe the exception of miners. BLM's longstanding multiple use policy should prevail on this issue.

I appreciate the provision in all Alternatives for small-scale negotiated sales of vegetative products, and I support this provision being carried forward into the final draft.

OHV

I strongly oppose the designation of the majority of public land as limited, to roads, trails, and washes.

Such a designation restricts legitimate users of the land; i.e., Rancher can't go get the sick calf, Hunter can't drive cross-country to pick up his buck, BLM can't drive out to inspect section corners, Landowner can't inspect land he bought sight unseen 20 years ago, etc.

These types of one-time traversing of the land by vehicles harm nothing, and the tracks are quickly obliterated by wind and rain (Pictures will follow).

81-2

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I recommend the majority of the public lands be left open as they are now. Of course I do not support repeated, indiscriminate, OHV use. However, if this becomes a problem, then the BLM can act on it as they did near Grasshopper Junction several years ago. Use the old adage, "If it ain't broke, don't fix it."

Land Disposal

I oppose the disposal of public land within any area that is proposed for Allotment Management Planning as a part of the livestock grazing program. I suggest an analysis of this constraint be considered as the final disposal/retention boundaries are decided.

I specifically oppose any disposal in the Sacramento Valley Watershed, North of Old Highway 66. Exceptions would be scattered tracks within the solid block of private land. In particular, I oppose disposal of the Curtain Allotment where we have worked so hard to establish Holistic Management. But most importantly, I oppose further disposal in this Watershed because the primary importance of managing the public land surrounding the large block of private land is for Watershed protection to insure an improved water cycle to support ground water supplies for the exploding population. The people are not aware of this but the professional land managers should be, and it is their responsibility to look to the future for the benefit of all.

This matter should be carefully considered in all the other watersheds involved in the RMP Area, and I hope final decisions on disposal will be carefully considered. Watershed Management may be the single most important issue for the future. Now is the time to consider how land disposal may effect the BLM's ability to manage the water resource.

Bojorquez Natural Area

81-3

I would like to recommend the final draft contain a proposal to designate the area encompassing the old Silver Creek Allotment and the two areas reserved for Wildlife which adjoin the allotment to the south as the Bojorquez Natural Area.

Albert Bojorquez was one of the early pioneers in the Bullhead City area. He was a good friend to the BLM and before his death initiated an exchange in which he gave three 40-acre parcels in prime Big Horn Habitat in the Black Mountains for about 12½ acres on the bahada below. As a part of this proposal, he was going to relinquish his grazing privileges for the benefits of the wildlife and burros. After his death, his widow Marie carried the proposal forward to completion because as she told me, "Albert wanted it that way."

Ms. Elaine Marquis  
April 11, 1991  
Page 4

Long before the Wild Horse and Burro Act was even thought of, Albert was the burro manager for the area. Over the years, he achieved population control by gathering over 6,000 burros from the area. Most he sold to Sears & Roebuck for sale in their catalog. You might call this the first adoption program. Albert was the one who introduced the spotted burro to the Oatman herd. I could go on about his contributions to the growth of the Bullhead/Riviera area, etc., but enough for these comments. I have more in my notes if you wish to pursue this idea.

I just think it would be fitting to remember his contributions to the local history by recognizing his name for the area he spent so many hours, weeks, and years caring for before anyone else took notice. I know the regulations provide for several types of designations. If Natural Area does not fit, then perhaps another one would. I hope you will give this idea serious consideration. Thanks much.

Conclusion

I believe that once the benefits of an implemented livestock grazing program are identified in the document then Alternative 1 will emerge as the preferred Alternative. Selected portions of Alternatives 2 and 3 could be added to make a good plan of management for the public lands.

If any of my comments need clarification, please feel free to contact me. I would be glad to discuss any of these matters at any time.

Thank you for the opportunity to comment on the RMP.

Sincerely,

  
Elno Roundy

82

Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Ave.  
Kingman, AZ. 86401

Dear Mr. Carter,

It is reasonable to assume that the BLM as custodian of vast amounts of public lands has always made effort to implement the concept of "Highest and Best Use." It follows therefore, that the Kingman Resource Area in the planning of its RMP/EIS for the next 20 years, should continue this appropriate philosophy.

There was a time when the Highest and Best Use of Public Land was mining, cattle grazing and about anything else anyone wanted to do to make a dollar off of it. There was lots of space, plenty of land. "This is America-do what you want. No one cares." Well, not anymore. Those of us who have grown older, watching the changes, have become polarized, even impassioned. I have seen the (endless) wilderness vanish at frightening speed, the casual trashing of those areas accessible to motor vehicles. Constantly, there are the hot, sweaty hands of commercial developers.

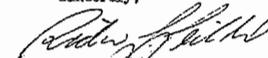
Our land must be preserved for use by the greatest number of people. This means Tourism, Recreation and Aesthetic Appreciation. How much pleasure was ever derived from the mining and cattle grazing on public lands? Furthermore, I suspect the financial contribution to the Kingman Resource Area from either mining or cattle is insignificant. There is alot of money in Tourism and Recreation though. There are the sellers of camping, hiking and backpacking equipment. Ask the businesses surrounding the access to Yellowstone and the Grand Canyon. So with Tourism, Recreation and Aesthetic Appreciation there is money to be made and enjoyment for the people. Surely this is the Highest and Best Use now and evern more so as time passes into your 20 year plan. Consider what it was like 20 years ago. People certainly care for the wild lands alot more now, don't they. Project this changing, more caring attitude into the next 20-years.

Tourism, Recreation and Aesthetic Appreciation can not co-exist with mining, cattle grazing, wood cutting and anything else that disfigures the land. A mining operation is ugly to see and creates noise, water and air pollution. There is a scar forever on the land. Cattle destroy the natural vegetation. They turn riparian areas into excretion covered, fly infested mud holes. The mooing of cows is not the preferred serenade in the wilds. A bull wandering through a camping area does not make for relaxation and a sense of well being. Wood cutting is simply unsightly mutilation.

Therefore, it is absolutely necessary you consider all lands that could conceivably be used for Tourism, Recreation and Aesthetic Appreciation as Areas Requiring Special Management.

It is there to see. Please don't miss the boat.

Sincerely,



Richard T. Leibold  
Environmental Chair  
Ramparts Chapter  
Sierra Club  
565-3213

83



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

12 APR 1991

Ms. Elaine F. Marquis  
Area Manager, Kingman Resource Area Office  
Bureau of Land Management  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

The Environmental Protection Agency (EPA) has reviewed the proposed Draft Kingman Resource Area Resource Management Plan and Environmental Impact Statement (DEIS). Our comments on this DEIS are provided pursuant to the National Environmental Policy Act (NEPA) and EPA's authorities under Section 309 of the Clean Air Act.

The Kingman Resource Area DEIS identifies and analyzes three alternatives for managing 2.5 million acres of land in western Arizona which are administered by the Bureau of Land Management (BLM). The alternatives are: Alternative 1 - No Action; Alternative 2 - the preferred alternative, which combines resource use with some environmental protection; and Alternative 3, which places smaller areas under special management, adds two disposal areas, increases recreation facilities, closes more areas to livestock grazing, and reduces wild horse numbers.

We have classified this DEIS as EO-2 -- Environmental Objections, Insufficient Information (see enclosed "Summary of Rating Definitions and Follow-Up Action"). EPA believes that the preferred alternative would perpetuate land management practices which adversely affect water quality, soils, vegetation, riparian habitats, and wildlife. According to the DEIS, livestock management, mineral development, vegetation harvest, and off-highway vehicle use in the planning area have had, and would continue to have, detrimental impacts on these resources. Changes to the proposed alternative appear necessary to provide adequate protection for the environment. We therefore recommend that BLM develop enforceable conditions to reduce or eliminate various practices' adverse impacts and where this is not feasible close additional areas to these activities.

We believe that this document contains insufficient information on which to base decisions regarding the long-term use of this planning area. Our rating reflects the need for additional information regarding the alternatives' potential impacts to the planning area's environmental resources as well as mitigation measures necessary to prevent or offset the potential impacts.

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-2-

We recommend that BLM consider preparing a draft supplemental EIS to address the needed information. We also recommend that BLM seriously consider preparing new grazing EISS for the planning area which would allow for needed revisions of current grazing practices and allotments. It does not appear appropriate to incorporate the existing 10- and 14-year-old grazing plans, which have not sufficiently protected water quality and riparian habitats, into this Resource Management Plan. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C., office. If you have any questions, please contact me at (415) 744-1015, or have your staff contact Jeanne Dunn Geselbracht, Office of Federal Activities, at (425) 744-1576.

Sincerely,

Deanna M. Wieman, Director  
Office of External Affairs

Enclosures

000639  
91-437

cc: Carol Russell, ADEQ

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CONSULTATION AND COORDINATION

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION\*

Environmental Impact of the Action

IO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Kingman Resource Area DEIS  
EPA Comments April 1991

Water Quality

1. Pursuant to Section 305(b) of the Clean Water Act, the Arizona Department of Environmental Quality (ADEQ) prepared a Water Quality Assessment Report for 1990. In addition, ADEQ prepared a Nonpoint Source Assessment Report (SAR) in 1988, pursuant to Section 319(a) of the Clean Water Act. Arizona's SAR, approved by EPA in 1989, provides the following information which should be cited in the Affected Environment section of the DEIS.

- ♦ Over 90 percent of Arizona's waters do not meet designated beneficial uses required by state water quality standards due to impacts from nonpoint sources.
- ♦ The most significant categories of nonpoint sources affecting Arizona's waters, by stream miles, are grazing, hydrologic/habitat modification, recreation and resource extraction.
- ♦ Waters which are affected in the Kingman Planning Area.

2. Pursuant to Section 319 of the Clean Water Act, states have the lead role in identifying and controlling nonpoint sources. In Arizona, ADEQ has been designated as the lead agency for implementation of the Section 319 Nonpoint Sources Program. Pursuant to Section 319(b) of the Clean Water Act, ADEQ prepared a State Nonpoint Source Management Program (SMP), which was approved by EPA on January 4, 1990. Arizona's SMP identifies federal programs and activities subject to the Federal Consistency review requirements of Sections 319(b)(2)(F) and 319(K) of the Clean Water Act. These sections require federal agencies to submit specific assistance programs and development projects to the lead state nonpoint source agency (ADEQ) for review for consistency with Arizona's SMP.

Specific BLM programs identified in Arizona's SMP include: watershed projects; mineral exploration and development; coal, oil and gas leasing; off-highway vehicle (OHV) activities; timber activities; grazing allotment/grazing management; chemicals/pesticides; area analysis/cumulative impacts; riparian management plans; and Area of Critical Environmental Concern (ACEC) plans. Further, it is BLM's responsibility to implement sufficient Best Management Practices (BMPs) to enable full protection of beneficial uses of surface waters, attainment of surface water quality standards, and compliance with the antidegradation provisions of 40 CFR 131.12.

83-1

We strongly encourage BLM to work closely with ADEQ to satisfy BLM's obligations under the Federal Consistency requirements of Section 319 and 40 CFR 131.12. We expect that BLM's development of a memorandum of understanding (MOU) with ADEQ would serve to facilitate this process and encourage BLM to establish this as a priority. The MOU should contain the procedures to be used in resolving conflicts between resource development activities and protection of surface water quality. Resolution of conflicts should ensure that beneficial uses of surface waters would be fully protected, that surface water quality standards would be attained, and that there would be no further degradation of surface water quality.

3. According to the DEIS (Table II-13), water quality in riparian areas in special management areas, unique waters, and scenic rivers would be monitored quarterly or biannually. The FEIS should identify the specific parameters that would be monitored at the testing sites as well as the appropriate water quality criteria or standards. We recommend that parameters to be monitored include appropriate parameters based on activities in each watershed (e.g., grazing, mining, vegetation harvest). At a minimum, these parameters should include nutrients, fecal coliform, total dissolved solids, and turbidity. In addition, waters potentially affected by mining activities should be monitored for metals and pH as well. BLM should consult with ADEQ in the design of the monitoring program.

We encourage BLM to also include appropriate bioassessment methods, such as the macroinvertebrate assessment method developed by the U.S. Forest Service, and any appropriate biological monitoring and assessment methods which have been developed by EPA pursuant to Section 304(a)(8) of the Water Quality Act of 1987. BLM should conduct bioassessments in surface waters that are potentially affected by nonpoint sources (e.g., Burro Creek). Bioassessments are particularly valuable in detecting effects of nonpoint sources of pollution including sediment loadings. Data collected should be entered into EPA's STORET database, to facilitate sharing data with other water quality managing agencies. We recommend that BLM enter biological data collected into STORET's BIOS database.

83-2 | 4. The FEIS should include baseline information regarding existing water quality for drainages in the planning area. This information is essential in a planning document for the purposes of identifying specific problem areas, tracking, and determining appropriate mitigation measures.

83-3

5. The FEIS should include a thorough discussion of the mitigation measures that would be implemented if it were determined that water quality had been or was being degraded in any of the drainages of the planning area.

#### Livestock Management Issues

1. According to the DEIS (page 129), rangeland management program priorities do not provide for needed revisions of AMPs on important areas supporting special status species. Continuation of existing grazing programs would result in further decline in conditions. It is unclear why BLM proposes to incorporate 10- and 14-year-old grazing plans and decisions into this Resource Management Plan (RMP), since these environmentally inadequate plans would be extended for another twenty years. We believe that these existing grazing plans should not be incorporated into this Resource Management Plan. We recommend that BLM seriously consider preparing new grazing EISs for the planning area which would allow for needed revisions of grazing practices and allotments. At a minimum, we urge BLM to incorporate into the FEIS provisions by which the existing rangeland management plans would be revised to protect the resources in the planning area.

2. We recommend that the FEIS briefly summarize the planning area's special livestock management practices currently implemented in sensitive watersheds or in watersheds in unsatisfactory condition. It is also unclear how, under this proposed RMP, AMPs could be revised to accommodate necessary allotment revisions based on resource needs of the planning area. The FEIS should discuss the parameters and standards that would be used to evaluate the need for revisions to AMPs for the purpose of protecting special status species, riparian areas, watershed resources, and areas of critical environmental concern (ACECS).

3. Livestock access to riparian areas has a significant negative impact on water quality due to trampling of stream banks and consumption of riparian vegetation. In light of the potential significant impacts to water quality from grazing in riparian and non-riparian areas, we suggest the following measures be identified for implementation in the FEIS:

- ♦ Include special provisions in grazing allotment plans to reduce the number of animal units in allotments during drought conditions.
- ♦ Develop and implement measures to discourage use of riparian areas by livestock (e.g., develop upland water

supplies; use fencing or other enclosure methods; implement appropriate rest-rotation grazing practices).

4. According to the DEIS (Appendix 18), BLM would manage livestock grazing in several ACECs to achieve goals and objectives of the ACECs. The FEIS should discuss the specific measures that would be implemented to achieve these goals and objectives (e.g., fencing, enclosures).

5. The upper Bill Williams watershed, the Bill Williams River, Wright Creek, and smaller creeks in the Hualapai Mountains have the best developed and most extensive riparian deciduous forest communities on the planning area and are valuable riparian resources (DEIS, page 115). In addition, areas of severe/critical erosion occur on alluvial fans near Wikieup, the Big Sandy River Valley, the Burro Creek area, lands adjacent to the Santa Maria River/Alamo Lake areas, the Dutch Flat area and small areas in the Sacramento, Detrital, and Hualapai Valleys, Hackberry, and Truxton. Erosion in these areas has been attributed in part to overuse by livestock. We urge BLM to consider closing all these outstanding riparian areas and areas of severe/critical erosion to livestock use. At a minimum, we recommend that BLM include Management Prescription #11 for the Hualapai Mountain Research Natural Area ACEC (DEIS, page 208) in other ACEC management prescriptions for ACECs with riparian preservation goals (e.g., Wright, Burro, and Cottonwood Creeks, and Three Rivers) and consider significantly reducing the animal unit months allowed on allotments in all areas of severe/critical erosion.

6. It appears that where public land would be acquired for ACECs, forage allocation as outlined on page 43 of the DEIS could conflict with the goals and objectives of ACEC plans. The FEIS should clarify this apparent discrepancy.

83-4 7. It is unclear from conflicting sections in the DEIS (page 143 and Table II-8) if Alternative 3 would close Poachie and McCracken ACECs while Alternative 2 would only limit grazing activities. We recommend that BLM include as a component of the preferred alternative greater protection for the desert tortoise habitat ACECs.

#### Mineral Development Issues

1. Surface disturbing activities associated with exploration and development of energy and minerals have the potential to increase soil erosion and loss of soil productivity and to cause declines in both groundwater and surface water quality and quantity (DEIS,

83-5 page 122). The DEIS discussions of the differences in potential impacts between the three alternatives is extremely vague. The FEIS should include more information on the impacts of mining in the district in the past and foreseeable future. It should specify for the entire planning area: mineral materials (including sand and gravel), mining activities, number of cases with each activity, and acreages disturbed or affected by each mineral material or activity. The FEIS should also provide this information for each ACEC, special management area, or riparian area within the planning area. The FEIS should also specifically evaluate the impacts of mining in these areas and discuss any mitigation measures that are necessary to protect water and air quality, soil resources, vegetation, and wildlife (including special status species).

83-6 2. Drainages such as Burro Creek are contaminated by mining waste. The FEIS should discuss the retroactive compliance program for existing mining activities in the planning area. The FEIS should also discuss in detail the Best Management Practices and mandatory mining regulations and bonding requirements for the State of Arizona and federally managed lands.

3. According to the DEIS (page 214), the Burro Creek riparian habitat supports the greatest recorded diversity of birds of prey anywhere in the United States. In light of the heavy metal contamination that has already occurred in the creek, we urge BLM to close the Burro Creek ACEC to mineral development. We also recommend that BLM close the McCracken and Poachie Desert Tortoise Habitat ACECs to future mineral development.

#### Special Management Areas

83-7 1. It is unclear why none of the rivers and creeks that are being considered for Scenic River designation has not been nominated for Wild River designation. The FEIS should distinguish between the different qualification criteria for Scenic and Wild designations, as well as the degree of protection that each designation would afford designated streams. In addition, these waters should be considered for Unique Waters designation through the State of Arizona standards process.

83-8 2. Approximately 60 percent of the riparian areas surveyed on the planning area are in unsatisfactory condition (DEIS, page 115). The FEIS should thoroughly discuss how riparian areas would be managed. BLM's riparian management plans should be consistent with Arizona's new Riparian Habitat Protection Policy (Executive Order 91-6: Protection of Riparian Areas, February 14, 1991). The FEIS should discuss this policy and address the goals

and objectives of riparian management on the planning district. The FEIS should identify monitoring parameters and methods and specific mitigation measures to ensure protection and/or enhancement of these areas.

Vegetation Management

1. The FEIS should discuss any vegetation management plans that are currently used by BLM on the planning area and whether new plans, subject to NEPA, will be drafted in the foreseeable future.
2. In light of the outstanding vegetation, fish, and wildlife resources in the riparian ACECs and other riparian areas on the planning area, we urge BLM to close all riparian areas to vegetation harvest.
3. The FEIS should discuss any pesticide use on the planning area with respect to its effect on fish and wildlife, particularly special status species, and on water quality. Appropriate precautions should be included in the discussion. The FEIS should discuss the use of pesticides or herbicides in relation to the following topics: cattle dip treatment; fire prevention programs; predator control programs; deer repellent programs; wood preservative treatment for fences; vegetation control near roads and right-of-way corridors; and control of disease vectors.
4. The FEIS should define "large-" and "small-scale" vegetation harvests (see DEIS, page 42). The FEIS should clarify whether large-scale vegetation harvest plans would be prepared as separate NEPA documents and whether small-scale harvests would be subject to decisions made in some other comprehensive vegetation management plan for the planning area.

83-9 | 5. The FEIS should thoroughly discuss the BMPs that would be implemented by BLM for all vegetation harvests.

Off-Highway Vehicle Use Issues

1. We urge BLM to consider closing washes to off-highway vehicle (OHV) use, particularly in light of the potential damage to watersheds, vegetation, and wildlife that would be posed by OHVs. In addition, it is uncertain that OHV users would prudently distinguish between washes and areas that may be marginal riparian areas or springs. We recommend that OHVs be limited to existing roads and trails and designated OHV use areas in the planning area.

2. Given the seasonally wet and dry conditions of Red Lake and the important habitat for raptors in washes surrounding Red Lake, we urge BLM to consider closing the playa and surrounding area to OHV use. The FEIS should discuss whether other areas are available for OHV designation, which may be less environmentally damaging.

Lands Actions

1. The FEIS should discuss the specific impacts to vegetative products, water quality, soil resources, wildlife, and other resources that would result from land withdrawals, recreation and public purpose uses, and right-of-ways under each alternative. For example, how many acres of various vegetative products would be impacted, or how many tons of soil could be lost due to erosion resulting from these actions? The FEIS should also discuss any mitigation necessary to prevent or offset adverse impacts.
2. The FEIS should discuss the purpose and need for the newly proposed utility corridors in the planning area. Alternatives to these corridors should be assessed, and the potential environmental impacts and necessary mitigation measures associated with each alternative should be discussed in detail.

Recreation Issues

1. According to the DEIS (page 122), intensive recreation activities would impact watershed condition by increasing erosion and reducing soil productivity. The FEIS should identify the potential environmental impacts of each alternative, where they would occur, and what mitigation measures would be implemented to protect resources from adverse impacts.

Special Status Species

1. The FEIS should identify the habitat improvement projects such as exclosures and spring developments that would be implemented to protect special status species.

84



## GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4312 (602) 942-3000

*Governor*  
**Fife Symington**  
*Commissioners:*  
 Thomas G. Woods, Jr., Phoenix, Chairman  
 Phillip W. Ashcroft, Eagar  
 Gordon K. Whiting, Klotzkye  
 Larry Taylor, Yuma  
 Elizabeth T. Woodin, Tucson  
*Director*  
 Duane L. Shreve  
*Deputy Director*  
 Thomas W. Spalding

April 12, 1991

Ms. Elaine F. Marquis  
 Area Manager  
 Bureau of Land Management  
 Kingman Resource Area  
 2475 Beverly Avenue  
 Kingman, AZ 86401

Dear Ms. Marquis:

Re: Kingman Resource Area, Draft Resource Management Plan and  
 Environmental Impact Statement

The Arizona Game and Fish Department has reviewed the Bureau of Land Management's (BLM) Kingman Resource Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS). We have provided comments below by management concern. Specific, page-referenced comments, and an errata are attached.

### FIRE MANAGEMENT

#### Common to All Alternatives

The Department believes that the BLM should adopt and identify prescription burn policies in the RMP. Our post burn management recommendations would include seeding with a mixture of native forbs and grasses, and prohibition of grazing within the burn area for a minimum of two years after the burn.

The fire suppression goals listed on page 25 appear too restrictive in that all fires would be suppressed by the BLM. If the BLM does not currently have a comprehensive fire suppression management plan, the Department recommends the development of a plan which would identify areas where reduced suppression would allow natural fires in targeted areas to burn a larger acreage before suppression. Additionally, other areas could be managed for no suppression.

The Emergency Fire Rehabilitation procedures may include seeding. Our Department recommends a mixture of native forbs and grass species for all seeding and reseeding efforts.

An Equal Opportunity Agency

Ms. Elaine F. Marquis

2

April 12, 1991

### WILDLIFE HABITAT MANAGEMENT

#### Alternative 2

The last paragraph in column 1 on page 33 and Table II-1 on page 33 should mention that the sheep numbers listed as proposed goals in 1981 were designed to increase bighorn numbers. However, we have recently determined that sheep numbers were already above these goals in the Black Mountains and on Mount Wilson when the Habitat Management Plans (HMP's) were written.

#### Movement Corridors

We support movement corridors for bighorn sheep on Highway 68 at Union Pass and on Highway 93 at Mile post 2.4.

We also support a movement structure on Highway 93 for mule deer at Coyote Pass. This should be an underpass or overpass associated with the 4-lane improvement proposal now under consideration.

### WILD HORSE AND BURRO MANAGEMENT

#### Alternative 2

Reference the Cerbat Herd Management Area (HMA), the Department believes that the maximum management level of 90 horses for the Cerbat horse herd should be subject to and contingent upon there being no detrimental impacts to wildlife or wildlife habitats as a result of this herd management level. Further, the EIS states on page 59 that "If the use limits are exceeded after the population limit of 90 horses has been reached, livestock and deer numbers would be reduced" (emphasis added). The Department maintains that the reduction of deer numbers is not a decision, nor is it an option that BLM can legally exercise and, therefore, should be deleted from the text.

84-1

We support BLM's goal of attaining wild horse and burro "management levels" for the Kingman Resource Area (page 117) by October 1992. Attainment and maintenance of this goal is imperative for maintaining healthy and sound wildlife habitat. We also enthusiastically support the Black Mountain HMA population attaining maintenance level by the end of FY91.

84-2

No mention of burro removals outside of authorized herd management areas is mentioned in the RMP. We suggest these areas be mapped and documented, and that an inventory and removal plan be developed with a goal of zero burros by a specified date.

Page 128 of the EIS states that "The current burro management philosophy is a dispersed population at a light stocking rate. Such burro management benefits wildlife habitat by resulting in increased forage production and availability, better habitat quality and condition, and reduced competition." The erroneous idea presented here is that burros are beneficial to wildlife, not

that a managed burro population is less detrimental to wildlife than an un-managed population. This paragraph needs rewording in order to more accurately express the merits of wild horse and burro management. Additionally, table II-13, page 89, should be modified so that burro population estimates are conducted at 3 year intervals.

84-3

**FUELWOOD MANAGEMENT**

Common to All Alternatives

Fuelwood cutting can be an effective and economically feasible management tool to improve wildlife habitat. The Department recommends that the BLM maintain fuelwood cutting as an option for wildlife habitat management.

**RANGELAND MANAGEMENT**

Alternative 2

The McCracken and Poachie ACECs are in both Alternative 2 and 3. Livestock grazing is eliminated from these areas in Alternative 3, but not in Alternative 2. Why isn't livestock grazing eliminated from these ACECs in Alternative 2?

Private and State lands are often over-allocated for livestock grazing and in poor condition. These lands should not be exposed to possible continued deterioration under federal management when they are acquired through the land exchange program. It seems only prudent that for each newly acquired block of land, BLM should determine proper forage allocation, and attempt to predict impacts to the environment from its actions, as prescribed by The National Environmental Policy Act. We recommend that all newly acquired lands should be inventoried and assessed before BLM administered land management practices are implemented.

**RECREATION MANAGEMENT**

Common to All Alternatives

Several of the proposed recreational sites would adversely affect wildlife and wildlife habitat. The Department questions the specific recreational needs identified in the RMP. We do not agree with the sites and types of recreational improvements identified.

84-4

For example, we think the Thimble Butte Campground in section 14 will be too close to the bighorn sheep ram pasture on Thimble Butte and too close to bighorn habitat near Baker Spring. We also think this campground would attract people to the prime desert tortoise habitat in this area to the possible detriment of the tortoise.

84-5

Also, we recommend that the campground at Pine Flat be developed at a different site at least 1/2 mile from the flat itself to lessen impacts to both Hualapai mountain voles and traditional campers.

84-6

Kingman Regional Park should take into account wildlife needs, such as two or three permanent waters and a movement corridor, to both enhance wildlife habitat and to mitigate human impacts to wildlife populations from the park itself.

We believe that the recreation management plan was not a result of a thorough and complete assessment of needs and impacts to these areas. The Department recommends that the BLM withdraw specific recreational management sites and proceed instead with a comprehensive recreational management plan based on identified demands and needs of user groups, as well as impacts to the environment.

**OHV USE**

Common to All Alternatives

The Department does recognize that significant impacts to wildlife habitat can occur through uncontrolled OHV use. However, we do not oppose OHV use in washes where no damage will occur to existing vegetation. We also recommend that the public have the option to drive off of designated roads and washes to retrieve legally killed game animals while hunting. This provision has been included in other RMP's, and we feel it should be made a part of the Kingman Resource Area RMP.

84-7

**AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)**

Alternative 2

The Department is strongly supportive of the ACECs specified in Alternative 2, provided that the Department will have an active role in development of the management plans for all ACECs in the Kingman Resource Area, and that ACEC management plans will be coordinated with, consistent with, and will not supersede existing HMPs, without concurrence of the Department.

Wright-Cottonwood Creeks Riparian and Cultural ACEC

84-8

Management prescriptions for wildlife and Threatened and Endangered species (T/E) should include an inventory to determine the presence or absence of native fish species. Inventory efforts should be coordinated with the Department.

Cherokee Point Antelope Habitat ACEC

84-9

Management prescriptions for wildlife (pronghorn) and T/E should include the following: 1) an inventory of existing and developed water sources; 2) identification of those areas not presently serviced by the availability of permanent water; 3) an inventory of existing fencelines; and 4) the development of a new and badly needed Allotment Management Plan for the Crozier Allotment currently operated by the Robinson family. Poor range conditions on this allotment have likely contributed to the overall decline of

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Ms. Elaine F. Marquis

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April 12, 1991

the area's pronghorn population and below-average pronghorn fawn survival. These efforts should be coordinated with a badly needed revision of the Cerbat-Music HMP.

Three Rivers Riparian ACEC

Any management efforts in this ACEC should be closely coordinated with the Department in regards to those activities which may be implemented in or adjacent to the Alamo Lake Wildlife Area. The Department (Region IV) is presently in the process of rewriting the management plan for this area. Our Department has the primary authority for management of wildlife and habitat in this wildlife area.

Black Mountains ACEC

Management prescriptions for wildlife (bighorn sheep and tortoise) and T/E should address the overall cumulative impacts of mining in critical bighorn sheep and desert tortoise habitat in the Black Mountains (refer to Minerals Management below).

MINERALS MANAGEMENT

The Department strongly reiterates the need for a comprehensive minerals management plan that will address the cumulative impacts of mining operations on bighorn sheep habitat in the Black Mountains. Piece meal evaluation of mining operations, on a case-by-case basis, is resulting in the segregation of critical habitat. Considering the importance of movement corridors for genetic exchange, management of mineral resources over the entire mountain range needs to be evaluated.

HABITAT MANAGEMENT PLANS

Common to All Alternatives

The Department stresses the importance of the HMP process for management and enhancement of wildlife resources. Historically, HMPs have been effective vehicles for improving wildlife habitat. The Department recommends that this RMP should not supersede or change priorities set forth in existing HMPs.

Overall, the BLM has done a commendable job with the enormous task of developing a RMP which will serve the public's myriad of interests. The Department believes that Alternative 2, when combined with recommendations and concerns referenced in this letter, would best serve wildlife and therefore the public. We accordingly recommend implementation of Alternative 2, after our concerns have been integrated.

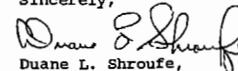
Ms. Elaine F. Marquis

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April 12, 1991

We appreciate this opportunity to comment on the Draft RMP/EIS for the Kingman Resource Area.

Sincerely,



Duane L. Shroufe,  
Director

DLS:KLY:ky

attachments

cc: Henry Bisson, Phoenix District Manager, BLM  
Steve Ferrell, Kingman Regional Supervisor, AGFD

## ATTACHMENT 1

## SPECIFIC PAGE-REFERENCED COMMENTS

PAGE	COMMENTS
13,22,31, 50,57,76, 78,80,85, 110,119	References to Wilderness - Wilderness Designations have been finalized and should be updated in the RMP.
17 <b>84-10</b>	Areas Requiring Special Management - "Provide for primitive motorized and non-motorized recreation". What is primitive motorized recreation ?
21	Existing Plans, Decisions, and Objectives - "Insecticides are also prescribed to control insects such as grasshoppers and crickets." The Department believes the BLM must consider more closely the detrimental impacts to wildlife caused by the use of pesticides on public land. The Department requests formal notification prior to any pesticide applications.
<b>84-11</b>	
25	Column 1, Paragraph 2, regarding Title 43 Subpart 4710.5b, a better explanation is needed to clarify the meaning of this paragraph.
34 <b>84-12</b>	State-listed Species Section - Reference is made to the "AGFD October Fish Count", This has been changed to the "AGFD Fall Fish Count" to allow more latitude in collecting dates.
35	Table II-2 - We question the rationale used in the priority ranking of riparian management areas listed in the table. Due to the existence of the State Listed Colorado roundtail chub <i>Gila robusta robusta</i> in Francis and Boulder Creeks, we feel these creeks merit a higher priority than that given. The Department would greatly appreciate being consulted in the development of management plans and priorities such as these. We feel that the expertise within our Department could enhance interagency management of important wildlife resources.
40 <b>84-13</b>	Communication Site Rights-Of-Way - We question the appropriateness of the Cherum Peak site when Windy Point already exists as a communication site. We recommend a less pristine site, such as Potato Patch or Hayden Peak which would likely meet these communication needs.
88 & 89 <b>84-14</b>	Table II-13 HAZMAT Element, Water Quality Item - It is not possible to use a "Visual" technique to measure units of "ppm". We suggest a more quantitative technique for this monitoring.

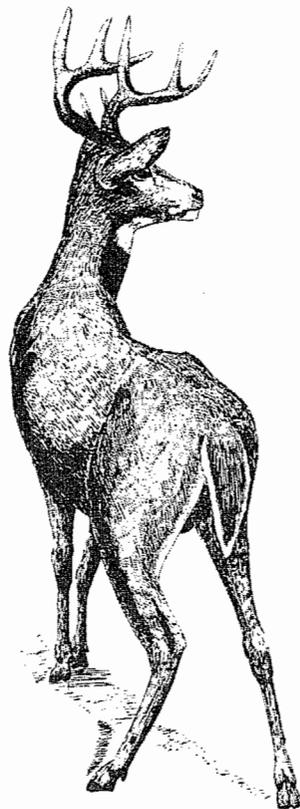
## ATTACHMENT 2

## ERRATA

PAGE	COMMENTS
ix	Introduction, paragraph 2 - correct "Federal Land Management and Policy Act of 1976 (FLMPA)" to "Federal Land Policy and Management Act of 1976 (FLPMA)".
12	Planning Criteria - correct "beforesurface" to "before surface".
19	Watershed Resources - correct "FLMPA" to "FLPMA".
23	1st line - correct "develop-ments" to "developments".
23	Column 1-HMP list, spelling of #3 Aquarius
45	Recreation Management Plan Actions Paragraph 8 - Reference to Table II-5 should be to Table II-9.
47	Plan Actions Section - correct "empha-sizing" to "emphasizing".
52	Table II-5, Western Bajada/Lands - correct "Acquire private" to "Acquire private".
66	Change Agent Mining Law, Alt.2 & Alt. 3 - correct "acquiredand" to "acquired and".
92	Table II-14 Wildlife Resource Alt. 3 - correct "...the sized of special..." to "...the size of special..." and "...eliminated from ACEC proposals..." to "...eliminated from ACEC proposals...".
93	Table II-14, Special Status Species, Alt. 2 - correct "limita-tions" to "limitations".
104	Table III-4 Category III - correct "...because of the soil temperature/moisture regime the soils..." to "...because of the soil temperature/moisture regime the soils...".
111	1st paragraph, 4th line from the bottom - correct "...on the Hualapai Mountains..." to "...on the Hualapai Mountains...".

## Errata cont'd

<u>Page</u>	<u>Comments</u>
113	Remarks Column for Javelina - correct "The present Havelina population..." to "The present Javelina population...".
126	Table IV, Mineral Park Area, Alt. 3 - align "Low" for Deterioration Type IV with those above for Type I-III.
134	3rd to last line - correct "Santa Maria (LGRA" to "Santa Maria (LGRA)".





April 11, 1991

Elaine F. Marquis  
Area Manager  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Re: Draft Kingman Resource Area Resource Management Plan and  
Environmental Impact Statement

Dear Ms. Marquis:

American Rivers, formerly named the American Rivers Conservation Council, is a national, public interest not-for-profit corporation with more than 15,000 members nationwide. American Rivers is the only national conservation organization dedicated exclusively to the preservation of free-flowing rivers. In its seventeen-year history, American Rivers has worked intensively to protect rivers under the federal Wild and Scenic Rivers Act and has actively assisted states and local groups with their river conservation efforts.

American Rivers has worked extensively with the Bureau of Land Management ("BLM") since 1987 in its planning efforts for the river resources on the public lands. American Rivers has assisted the planning staff in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and has reviewed and commented on numerous BLM plans. American Rivers has filed to date five Protests of Resource Management Plans. Each Protest alleged, *inter alia*, that the individual RMP failed to comply with the Wild and Scenic Rivers Act and explicit agency administrative requiring that BLM study potential wild and scenic rivers and provide interim management prescriptions for those rivers found eligible. On June 4, 1990, the Director agreed that the subject RMPs<sup>1</sup> failed to comply with the Wild and Scenic Rivers Act and advised the affected State Directors that additional planning was required to comply with established requirements.

American Rivers members live near, use and benefit from the

<sup>1</sup> The Director's decision resolved American Rivers' four Protests then pending. One more RMP has been Protested since June, 1990; no decision has yet been made.

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resources of the Kingman Resource Area ("KRA"), including its rivers and associated landscapes.

#### GENERAL COMMENTS

Section 5(d) of the Wild and Scenic Rivers Act, 16 U.S.C. section 1271 et seq., requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. 16 U.S.C. section 1276(d). The planning responsibility imposed by section 5(d) plainly requires the BLM to assess the values of potential Wild and Scenic Rivers during the preparation of resource management plans pursuant to the FLPMA. Recognizing that responsibility, BLM Manual Section 1623.41A2d identifies wild and scenic river recommendations as a possible determination to be made in such plans.

To provide further guidance for fulfilling BLM's planning responsibilities for potential wild and scenic rivers, the agency's Washington office on July 23, 1987 circulated Instruction Memorandum No. 87-615, containing draft guidelines for identifying, evaluating, and protecting potential wild and scenic rivers on BLM lands. That guidance was promulgated by the Director in final form in Instruction Memorandum No. 87-670 and the attached Guidelines for Fulfilling Requirements of the Wild and Scenic Rivers Act (the "Guidelines"), issued September 8, 1988 and renewed annually. In addition, the Director included a "Wild and Scenic River Act Plan Review Procedures Summary" ("Procedures Summary") with his June 4, 1990 Memorandum to State Directors concerning the resolution of existing American Rivers' Protests that clarified certain elements of the study process.

Under the directions established in the Guidelines, planning for potential wild and scenic rivers on BLM lands follows a relatively straightforward, three-step procedure. Each BLM resource management plan is to:

- (1) evaluate the eligibility of potential wild and scenic rivers within its planning area for inclusion in the National Wild and Scenic Rivers System in accordance with the criteria set forth in Section 1(b) of the Wild and Scenic Rivers Act (i.e., whether the river is free-flowing and possesses one or more "outstandingly remarkable" values);
- (2) determine the appropriate classification ("wild," "scenic," or "recreational") for rivers found to be eligible;
- (3) assess the suitability of such rivers for inclusion in

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the national rivers system, based upon the public values and uses that would be enhanced or foreclosed by such protection, the degree of public, state and local interest in designation, and practical concerns regarding costs and feasibility of administration.

Guidelines, Section VIII, at 9-12.

Until a final decision is reached by the agency and, for recommended rivers, by Congress, BLM is to protect river resource values and characteristics through specific management prescriptions established in specific or programmatic interim management plans. Guidelines, Section IV.C., at p. 7; Section IX, at p. 20.

I. Comments Concerning Eligibility

American Rivers commends the Kingman planners for their determination that segments of 5 rivers are eligible for inclusion in the national rivers system. Each of the rivers determined to be eligible possess extremely high resource values which would qualify them for inclusion in the national rivers system.

The commitment and sensitivity of the KRA to river issues is very striking. American Rivers is particularly pleased that the KRA planners did not limit their analysis merely to those rivers listed on the National Rivers Inventory, but instead conducted a resource inventory of all rivers within the KRA. Draft at 111. A solid foundation now exists from which the KRA planners may complete one of the finest rivers study of any BLM resource area.

The description of ineligible rivers, Draft at 111-112, is a very helpful component of the plan. The Final should specify whether other rivers, and which ones, were examined and found ineligible.

American Rivers questions the basis for the determination that certain segments are ineligible. The segment of the Santa Maria River that was determined ineligible should be reexamined. The presence of private or state land is not a factor of eligibility; it may be a factor in determining whether a river is suitable, but it is irrelevant to a determination of whether a river is free-flowing and possesses one or more outstandingly remarkable values. Similarly, lack of resource inventory data is not a proper reason to find a stream ineligible; the planners should obtain data necessary to make decisions of how to manage the land and its resources.

American Rivers believes also that the Kingman planners

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misinterpreted BLM guidance concerning study of rivers which flow through mixed ownerships. BLM guidance indicates that the percentage of BLM ownership, i.e., substantial control of 40-50 % of the total shoreline and adjacent lands, should be used as a guide in identifying segments for study. Guidelines, section VIII.A.1.c. The Guidelines also provide that "joint studies" should be followed, to the extent practical, where a river identified on the NRI touches only a small area of public lands. Id. at VIII.C.<sup>2</sup>

American Rivers believes that the appropriate procedure to be followed in situations of mixed ownership is to determine whether a stream and its adjacent area possesses outstandingly remarkable values. This determination may include the identification of particular segments, based upon land ownership, changes in river character and the other factors listed in Guidelines, section VIII.A.1.c. If a river segment is eligible, then it is subject to interim protection pending a determination of suitability.

BLM may defer suitability studies of particular streams, particularly in the case of a joint study, Guidelines, section VIII.B and C, however, the RMP must include decisions on eligibility and classification. Id.

Thus, in cases such as the Santa Maria River, where BLM administers 11 miles of a 17 mile long stretch of river, BLM should determine, at minimum, whether the river and lands it administers are eligible. BLM may choose to defer the suitability study to a joint study, however, the Plan should identify which streams may be eligible for the national rivers system and it should protect those streams, or stream segments, which do qualify until a decision has been made concerning the stream's suitability for federal designation.

The Final RMP should include descriptions of each river that document with greater specificity the particular outstandingly remarkable values possessed by each stream. Mere reference to ACEC descriptions is an inadequate substitute for descriptions of individual streams and their outstandingly remarkable values.

Only through full documentation of the basis for BLM's findings

<sup>2</sup> Although the Guidelines explicitly refer to "joint studies" only in the context of NRI rivers, American Rivers believes that the principle of interagency cooperation should not be limited to NRI-listed rivers. Rather, the BLM should pursue such interagency cooperative agreements whenever a river which possesses outstandingly remarkable values is identified.

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can the public be assured that the agency has in fact given these streams the consideration mandated by section 5(d) of the Wild and Scenic Rivers Act, and that rivers and streams with potential as additions to the national rivers system have not been rejected on a superficial examination.

The fundamental importance of such documentation is plainly expressed in the Guidelines: "The RMP record of decision (ROD) serves as the release document for river areas, or portions of river areas/segments, determined nonsuitable for WSR river designation." Section VIII.B.1.

Moreover, pursuant to the National Environmental Policy Act (NEPA), the planning documents must assess the potential environmental impacts of any decision not to recommend rivers for inclusion in the national rivers system. In *California v. Block*, 690 F.2d 753 (9th. Cir. 1982), the United States Court of Appeal for the Ninth Circuit held that the Forest Service is required to prepare a site-specific EIS when it decides in its planning process to release potential wilderness areas for nonwilderness uses. BLM decisions not to recommend designation for potential wild and scenic rivers, like decisions releasing potential wilderness areas, irretrievably commit the resources of such rivers and their adjacent lands, and require similar site-specific environmental analysis. Even where the BLM establishes relatively protective prescriptions for a river area in its RMP, such as an ACEC, the decision not to recommend Wild and Scenic River designation exposes the river to a continued risk of hydroelectric development that may degrade or destroy the river's free-flowing character, and to mineral development that may impair its outstanding natural values.

American Rivers' concern with the depth of the planners' eligibility analysis is not a mere academic concern. In addition to identifying eligible streams, the description of outstandingly remarkable values is a central component of any suitability study. The heart of the suitability determination is a consideration of the characteristics that make a river and its corridor a worthy addition to the national rivers system. Guidelines, section VIII.A.3. That analysis is crippled if the eligibility determination is incomplete. Also, streams not found eligible are subject to management activities which may impair or even preclude their later inclusion in the national rivers system.

American Rivers is concerned also that the planning team may have adopted a screen, either formally or informally, that resulted in the exclusion of streams of relatively small length or volume. Congress provided an expansive definition of "river" in the Wild and Scenic Rivers Act. See 16 U.S.C. §1286(a)

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("River" means a flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes."). The wild and scenic rivers system encompasses a wide range of rivers and streams, from Alaska's vast Fortymile River system to the North Fork Owyhee in Oregon to Louisiana's Saline Bayou River. The public lands planning activities of BLM and the Forest Service are leading to the identification of literally hundreds of rivers eligible for the national wild and scenic rivers system.

## II. Classification

It is impossible to provide detailed comments on particular classifications due to the sparse data provided in the plan. American Rivers questions, however, whether the planners have carefully and appropriately classified each of the eligible rivers. We have never reviewed a plan which has provided a single classification for every river mile found eligible.

## III. The Kingman RMP Fails to Establish Detailed Management Standards

In order to protect the resource values and character of its potential wild and scenic rivers until a decision is reached regarding their designation, BLM's Guidelines require agency planners to establish detailed management prescriptions. The Guidelines state: "... the RMP must prescribe the protection (interim management prescriptions) to be provided for the river and adjacent public land area pending the suitability and, when necessary, subsequent action by the Congress." Guidelines, Section VIII.A.3.a., at p. 11 (emphasis added).

The Guidelines address in detail the scope of management prescriptions that should be adopted:

Specific management prescriptions for river corridors identified from the NRI list, or otherwise identified for study, should provide protection in the following ways:

1. Free-flowing values. The free-flowing characteristics of such identified river segments cannot be modified to allow stream impoundments, diversions, channelization, and/or rip-rapping to the extent the BLM is authorized under law.
2. River values. Outstandingly remarkable values of the identified river segment or area must be protected (subject to valid existing rights) and, to the extent practicable, enhanced.

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3. Classification Impacts. Management and development of the identified river and its corridor cannot be modified, subject to valid existing rights, to the degree that its eligibility or classification would be affected (i.e., its classification cannot be changed from wild to scenic, or scenic to recreational).

Guidelines, IX, B., at 1-20.

85-3

Many of the management prescriptions listed for the relevant ACECs within which the rivers are located are adequate to protect significant resource values, however, there is no indication that the required 1/4 mile corridor is established, nor are there standards to ensure free-flowing values are maintained and enhanced.

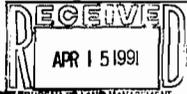
American Rivers suggests the planners contact the Bishop Resource Area in California or the Three Rivers Resource Area in Oregon. Both of these Resource Areas have included excellent management prescriptions in their Draft RMPs.

We trust these comments assist the planning team complete and improve the RMP. Please do not hesitate to communicate with us if you have any questions concerning any of the matters set forth above. American Rivers looks forward to working closely with the Kingman Resource Area.

Sincerely,

  
Thomas J. Cassidy, Jr.  
Public Lands Counsel





**Arizona Nature Conservancy**

300 East University Boulevard, Suite 230, Tucson, Arizona 85705  
(602) 622-3861 FAX (602) 620-1799

Bill Carter  
BLM Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

9 April, 1991

Dear Mr. Carter,

I am writing on behalf of the Arizona Nature Conservancy with comments on the Kingman Resource Area Draft Management Plan. We appreciate the opportunity to review and comment on your draft Plan. We offer the following comments to ensure that the Plan adequately addresses the management of rare and endangered species of plants and animals and their habitats, and the management of sensitive natural communities.

Our response to the RMP is organized in two parts; first, some general comments about several general issues that we feel are important in the plan, and second, page-by-page comments of a more specific nature where the text of the RMP could be clarified or improved.

Areas of Critical Environmental Concern:

In general we strongly support the ACECs and their management prescriptions as presented in the Preferred Alternative (Alt. 2). The Kingman Resource Area (KRA) is responsible for a variety of unusual and sensitive wildlife and natural community resources that require special management attention. Designation of special management areas such as ACECs is often the best way to ensure the protection of these high-priority natural areas.

Three Rivers ACEC -- The Cottonwood-Willow forest such as that found along the Big Sandy, Bill Williams and Santa Maria rivers is among the best of the remaining stands of this riparian forest type in the southwest, and may be the only viable stands in the Bill Williams drainage system. Cottonwood-Willow riparian forests have been found to have among the highest breeding bird densities of any natural community in North America. The high bird densities are the result of numerous nesting sites provided by structural heterogeneity of the riparian forest community, coupled with the diverse foraging habitats in the associated aquatic and adjacent upland communities.

The resource values of the Alamo Lake area are clearly of more than local significance. The Southern Bald Eagle is nationally recognized by the Fish and Wildlife Service as an endangered species requiring special management attention. Also, the Desert Tortoise is a candidate for listing and some populations of the tortoise already have been listed.

We support withdrawal of the riparian zone from mineral entry and limiting OHV use to designated roads and trails. One of the highest priority management actions here should be acquiring instream flow water rights.

Treating the Three Rivers area as a single ACEC is preferable to the treatment suggested in Alternative 3 in which Alamo Lake is excluded from the ACEC. Although the best riparian habitat is found along the rivers and not at the lake, the management of the lake is critical to many resource values that the ACEC is intended to protect. For example foraging of Bald Eagles on fish in the lake is directly affected by lake management, and management of dam releases are critical to stream flows on the Bill Williams River below the lake. For this reason, it makes sense to include the lake area in the Three Rivers ACEC to highlight the need for management coordination among the agencies involved in management of Alamo Lake.

Black Mountains ACEC -- The Cerbat Beard-tongue is a rare plant that is known only from north-western Arizona, north-eastern California and southern Nevada. This species is presently a candidate for listing as threatened or endangered with the U.S. Fish and Wildlife Service. Some known populations in California and Nevada have declined due to human activities. Management of the Black Mountain population may contribute significantly to the decision of whether or not to list this plant.

In Arizona this plant is known only from the Black Mountains in the Kingman Resource Area. This species was collected in the Black Mountains in 1937 and was not seen there again for fifty years, leading to speculation that it may have been extirpated. However, it was found again in 1989 and it is currently known from two locations.

We strongly recommend closing the canyon bottom habitat of this species to saleable mineral extraction, and we support restricting OHV use to designated roads and trails. The acreage of available habitat is sufficiently restricted that any additional disturbance in the canyon bottom areas would significantly impact the beard-tongue's population.

White-margined Beard-tongue ACEC -- The White-margined Beard-tongue is a rare plant that is known from only six locations in northwestern Arizona, southern Nevada and northeastern California. Of the six historically known locations, recent surveys have been unable to locate the plant at one site in California, leaving just five currently known populations of the

species. Of these, by far the largest is that near Yucca in the Kingman Resource Area. The White-margined Beard-tongue is a candidate for listing as threatened or endangered by the U.S. Fish and Wildlife Service.

The proposed ACEC is also good Desert Tortoise habitat that supports relatively high densities of tortoises. If the private parcels in the area are acquired by BLM, making the area more manageable, the area will qualify as Category 1 tortoise habitat. The Desert Tortoise is also a candidate for listing by the Fish and Wildlife Service.

This area has mixed ownership, so we recommend that BLM acquire land in the area to consolidate management. We recommend that the area be closed to mineral entry and OHV use be restricted to designated roads and trails. The Yucca population is by far the largest known population of this species, so the management of this species on the Kingman RA will have a major influence on whether this species is considered for listing by the U.S. Fish and Wildlife Service.

Joshua Tree Forest ACECs -- Joshua Tree vegetation is found in Arizona only on the Kingman RA, and some of the stands there rival any in the country, including those in Joshua Tree National Monument. The Joshua Tree stands in the proposed Grand Wash Cliffs ACEC are especially well developed, and are particularly scenic, with the back-drop of the Grand Wash Cliffs making the area a significant visitor attraction.

In addition, the McCracken Mountains and Poachie Mountains proposed ACECs support an unusual plant community that is transitional between Mohave and Sonoran desertscrub. The species assemblages found in these areas are known only from Arizona. Several characteristic species found there are among the most distinctive dominants of the two desert regions, giving the area a very unusual vegetative aspect. These species include columnar Saguaro cactus and spidery Ocotillo of the Sonoran Desert, combined with Joshua Trees, Bigelow Nolina, and Mohave Yucca of the Mohave Desert.

We support the management prescriptions presented in Alternative 2 for the three ACECs that include the Joshua Tree natural communities. The management prescriptions proposed provide a balanced approach for protection of the unusual ecological features of these areas, but without closing them to carefully managed commercial uses.

Burro Creek ACEC -- Burro Creek has been recognized for years as one of the most important riparian areas in western Arizona. It supports a healthy, diverse native fish fauna and it has the greatest number of nesting raptor species known from any comparable area in the country, including bald eagles and peregrine falcons.

We support the management prescriptions presented in Alternative 2. The two most important management prescriptions here are acquisition of instream flow water rights and closure of the riparian corridor to mineral entry and mineral materials disposal.

Clay Hills ACEC -- This site supports Arizona Cliffrose, a plant that is found only in Arizona and is known from just a handful of populations. It is found only on an unusual rock substrate, making it vulnerable to mineral development of its habitat.

The most important management prescription at this site is withdrawal from mineral entry to protect the population of cliffrose from further population declines due to loss of habitat.

Hualapai Mountain ACEC -- The high elevation meadows supported by springs in this area are home to the Hualapai Mountain Vole, a small mammal found only in mountains in the Kingman area. These small, specialized habitat sites are critical to the survival of this animal, and are vulnerable to several kinds of impacts, including grazing, recreational use, and water diversion. This area is one of the most critical management priorities on the KRA.

We support the management prescription in Alternative 2 for this area, and we emphasize that it may have the most urgent management needs of any area on the KRA. Instream flow water rights should be acquired for the springs, fencing should be installed and maintained to exclude grazing and recreational visitors, and the area should be closed to mineral entry.

#### Riparian Habitat:

As you correctly recognize in the draft Plan, riparian areas are the most significant ecological habitats on the district with regard to maintenance of biological diversity of all kinds. One of the most effective tools for protecting the plant and animal life associated with riparian and wetland areas is acquisition of instream flow water rights. Where management actions are prioritized for riparian wetland areas (pg. 35), acquisition of instream flow water rights should be included as the highest priority management action for all perennially flowing streams that support native fish or significant wildlife habitat.

A major threat to riparian areas is mineral extraction activities that can cause habitat destruction, erosion, and water quality problems. The riparian corridors for all perennial streams should be withdrawn from mineral entry and closed to sale of mineral materials.

It would be helpful to include a detailed description of riparian area management goals, including criteria used to

evaluate different riparian habitat conditions. This is an area of considerable discussion and confusion among various agencies and individuals, but objective descriptions of ecological goals are necessary to provide guidelines for monitoring and evaluation of progress toward management goals. An example of the confusion that can arise is the different terms used within the draft Plan to describe riparian area goals: pg. 15 - "good or better ecological status"; pg. 24 - "advanced ecological status"; and pg. 34 - "proper functioning condition." Do these terms all mean the same thing?

Page-by-page Comments:

pg.13, last paragraph -- One of the Hualapai Mountain meadows was dropped from consideration for ACEC status due to its inclusion in the Wabayama Peak WSA. A management prescription protecting the meadow habitat and the Hualapai Mountain vole that lives there should be included in the wilderness management plan. Two of the major threats to the site are grazing and recreational visitors, neither of which are excluded by wilderness designation.

86-1

pg.16, top of page -- In describing your goal of 10% of the RA in "early seral stage" it would be helpful to provide a definition of seral stage. Generally, seral stages are described in relation to some kind of disturbance. Your goal of a low percentage of the RA in an early seral stage could be interpreted to restrict the use of prescribed fire (another goal on the same page) that might create extensive areas of an "early seral stage."

pg.17, right column, third paragraph -- OHV events are mentioned here as a possibility on the KRA, but are not discussed elsewhere in the Plan under OHV management (i.e. pgs. 31, 45). In California OHV cross-country events have been shown to be very destructive, with major damage to watershed condition such as soil compaction and erosion. We recommend that OHV events not be permitted on the KRA.

pg.25 -- In your goals for Emergency Fire Rehabilitation, native plants should be used wherever possible for revegetation of burned areas.

pg.27 -- The lands indicated for disposal in Alternative 1 (Map II-1) include essential habitat for the White-margined Beard-tongue near Yucca, east of the Yucca-Lake Alamo Road. These lands should be retained and managed to protect this rare plant, as described in the ACEC prescription for this area.

pg.35, right column -- The list of streams for which instream flow rights will be acquired does not include Francis Creek, Grapevine Spring, and Upper Bull Flat. These significant riparian sites should be added to the list.

pg.43 -- We support the retirement of the Alamo and Chino Springs allotments. These ephemeral allotments have very low value for grazing, but include significant riparian habitat along the Big Sandy and Bill Williams rivers that has been damaged by improper grazing management in the past.

pg.49 -- Establishment of wildlife corridors is a good, innovative idea, however little information is currently available to guide the design of such corridors. We recommend that the Plan include a program to monitor wildlife use of corridor areas to establish background information for future wildlife corridor planning.

pg.167 subintegra is misspelled at top of page, Orobanche is misspelled at bottom of page.

pg.169 regalis is misspelled in middle of page.

pg.170 Choeronycteris is misspelled at top of page.

Thank you for the opportunity to comment on the draft Plan. If we can be of further assistance, please feel free to contact us.

Sincerely,

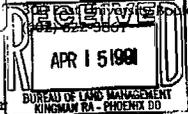


Peter L. Warren  
Public Lands Protection Planner



### The Arizona Nature Conservancy

1000 North McDowell Boulevard, Suite 230, Tucson, Arizona 85705  
FAX (602) 620-1799



Bill Carter  
BLM Kingman Resource Area  
2475 Beverley Avenue  
Kingman, AZ 86401

12 April, 1991

Dear Mr. Carter,

I am writing on behalf of the Arizona Nature Conservancy with comments on the Kingman Resource Area Draft Management Plan. This letter is a supplement to the letter sent earlier to address one point that was missed in the earlier letter.

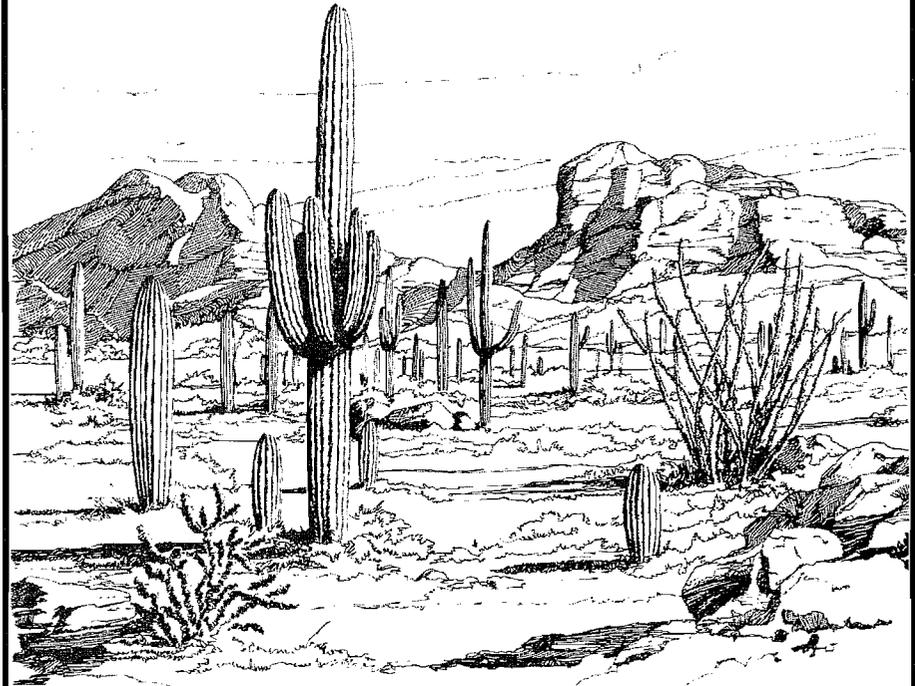
On page 43 in the first paragraph in the right-hand column, you state that when land is acquired from the State of Arizona, "forage will be allocated to livestock at the same grazing capacity as had been set by the State prior to exchange."

**86-2** | We strongly recommend that BLM conduct its own analysis of grazing capacity for all newly acquired land, and set stocking rates accordingly. The State does not have the same environmental protection mandates that BLM does, and it is not appropriate to assume that stocking rates determined by the State will meet the guidelines for sustainability and environmental protection that BLM must follow. Before an allotment plan is written and implemented on newly acquired land, the BLM should conduct a new grazing suitability and capacity analysis.

Thank you for the opportunity to comment on the draft Plan. If we can be of further assistance, please feel free to contact us.

Sincerely,

Peter L. Warren  
Public Lands Protection Planner



87



**FRIENDS OF ARIZONA RIVERS**

303 E. Medlock Dr.  
Phoenix, Az. 85012  
265-4325 (H)

April 13, 1991

US BLM Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Mr. Bentley:

This letter offers comments on the draft Kingman Resource Area RMP-EIS, Nov 1990.

I am pleased that you have placed an emphasis on the protection and restoration of riparian areas. In reviewing the impacts of the various alternatives, I recommend Alternative Two, the KRA Preferred Alternative, as the overall best approach.

There are a few specific proposals for modifications to the Preferred Alternative that I wish to make.

A. I recommend that you create one or two special riparian restoration zones (SRDZ) that can be compared to zones that are placed under no special management. The purposes of such a comparison would be 1) to demonstrate whether it is possible to restore riparian areas in the KRA, 2) to demonstrate what such a restored zone would look like, and 3) to generate information that may be useful in planning for restoration of other riparian areas listed in Appendix 7 (page 172). I recommend you select the SRDZs to be a comparable as possible to "matched control" areas not placed under special management. The three activities particularly needing to be excluded from the SRDZ are cattle grazing, vehicular use, and vegetative clearing. The SRDZ could be chosen from among the ACECs proposed under Alternative 2 or could be chosen from Appendix 7 and managed accordingly. Comparable, geographically sequential reaches of any of the longer riparian areas on Appendix 7 also would suffice as the SRDZ and "control zones." SRDZs would require appropriate fencing and land management. Evaluation of the effect could be performed on an infrequent basis, and would not require a great deal of resources.

B. I applaud your Wild and Scenic River (W&SR) evaluation of the five streams listed in Appendix 22. However, the entire length of the Santa Maria River should be considered for W&SR eligibility; the areas under state control should be planned for acquisition by trade. I am not familiar enough with the Big Sandy River to know whether it would be valuable to acquire the non-BLM lands through trade.

87-1

Page Two

C. On my mid March trip on the Bill Williams River I noted that the riparian quality downstream to the area near Reid Valley was in a much impacted condition. Tamarisk and salt cedar had choked out most native trees, fences were in a state of disrepair, cattle had heavily overgrazed, and wild burros and their tracks were all too common. Beaver appeared to have been active in the past. Proper management will require a multi-disciplinary, multi-agency effort. Not to be overlooked is the need for a more dependable flow of water from Alamo Dam. A flow more representative of the natural regime is needed.

D. The management objective for the 14 ACECs proposed under Alternative Two are reasonable. Perhaps Wright Creek in the north half, and Santa Maria River in the south half could be selected as the SRDZs I proposed above.

E. The Arizona Rivers Coalition recently produced its proposal for W&SR designations. Friends of Arizona Rivers, a member of the Coalition, asks the BLM-KRA to be cognizant of this proposal and to actively participate in the discussions to be generated during the political and legislative process to follow. We ask that BLM work with the Coalition in selecting the best remaining segments in Arizona for W&SR designation.

Thank you for the opportunity to comment.

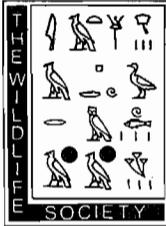
Sincerely,

*Tim Flood*  
Timothy J. Flood

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CONSULTATION AND COORDINATION

88



THE WILDLIFE SOCIETY, ARIZONA CHAPTER

P.O. Box 41337  
Phoenix, AZ 85080-1337

April 12, 1991

Ms. Elaine F. Marquis  
Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

Dear Ms. Marquis:

Re: Kingman Resource Area Draft Resource Management Plan and Environmental Impact Statement.

The Arizona Chapter of the Wildlife Society would like to thank the Bureau of Land Management (BLM) for the opportunity to review and comment on the draft Kingman Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The Society has been extremely active in environmental issues that may both potentially impact or protect Arizona's diverse natural wildlife and habitat heritage.

In review of the three alternatives considered for analysis by the draft RMP/EIS, we are strongly supportive of Alternative 2. We believe that Alternative 2 will provide the best tool for guiding management of both resources and various multiple uses on public lands within the Kingman Resource Area (KRA).

In recognizing that the planning process for this draft RMP/EIS was issue driven, the following specific comments by issue or management concern are offered for your consideration.

VEGETATIVE PRODUCTS MANAGEMENT

We are supportive of BLM's direction to inventory and develop management plans for fuelwood cutting. Properly designed fuelwood cutting can be one tool for creating a mosaic of wildlife habitat within dense stands of pinyon-juniper dominated plant communities. However, without proper management and enforcement, woodcutting areas are often littered and severely degraded by off-highway vehicles or other uncontrolled public uses.

RANGELAND MANAGEMENT

We are generally supportive of BLM's direction to develop and revise Allotment Management Plans (AMP's), especially as needed on those allotments to be affected by Areas of Critical Environmental Concern (ACEC) or Special Recreation Management Area (SMA) designation. However, we recognize the critical importance of properly managed public lands resource area-wide, to wildlife and habitat resources, and therefore, would recommend that the BLM prioritize it's AMP planning process after consideration is given to all grazing allotments within the KRA as based on need or condition.

88-1

All state or private lands acquired by BLM through exchange should be subject to the same range management principles as applied to public lands. Often state lands are of poor condition and should not be subject to continuation of existing grazing practices.

Additionally, we are strongly supportive of the change-in-kind of livestock action that would prohibit domestic goats or sheep within or adjacent to occupied bighorn sheep habitats. The potential consequences to bighorn populations, especially in the Black Mountains, from various disease vectors are far too great to consider otherwise.

RECREATION MANAGEMENT

We recognize the BLM's desire to increase public recreational opportunities within the KRA. However, we would recommend caution when identifying sites for permanent or developed campgrounds in remote outlying areas. Increased public use can often degrade surrounding or existing wildlife and habitat resource values. Developed facilities should be carefully planned and policed. We would suggest that the BLM develop a more comprehensive recreational management plan that would consider the needs and impacts of potential recreational sites.

We strongly support the BLM's attempt to intensively manage or regulate off-highway vehicle (OHV) use within the KRA. More control of OHV use will help to protect and enhance wildlife and habitat resource values without significantly impeding various non-consumptive or consumptive public uses or access. We recommend that the BLM adequately enforce and properly sign or post such areas.

SPECIAL AREA DESIGNATIONS

We strongly support the BLM's direction to identify and designate ACEC's within KRA. These special area designations should help to promote public awareness of sensitive or critical wildlife and riparian habitats in need of additional protection or enhancement.

ACEC designation should not detract from other resource values or multiple uses of these areas, but rather to develop and implement more intensive management and monitoring of past, present and future activities. Management plans for proposed ACEC's should be developed and coordinated with other management plans for the area, especially Habitat Management Plans (HMP's).

#### WILDLIFE HABITAT MANAGEMENT

We support and encourage the BLM in it's effort to continue with the development or revision and implementation of new or existing HMP's within the KRA. We view these documents as the essential and driving wildlife habitat management tool for KRA. BLM in Arizona currently has one of the most progressive and effective HMP programs in the United States. We realize the need for additional emphasis on special status or sensitive species and monitoring. However, the RMP should not supersede HMP's as the guiding wildlife management tool. We recommend that the HMP's be left intact and revised or developed to include these additional needs. Any additional funding realized from the designation of ACEC's for wildlife enhancement or improvements should be directed by approved HMP's.

#### RIPARIAN AREA MANAGEMENT

We strongly support the BLM's efforts to identify, inventory and classify riparian-wetland areas within the KRA and the overall RMP objective to restore and maintain 75 percent of these areas in proper functioning condition by 1997. However, we believe that this noble attempt will take a combination of decisive resource or multiple-use management actions and additional funding from BLM or other sources before it can be achieved. When the proposed Riparian Area Management Plans (RAMP's) are completed, additional funding may be more attainable.

Additionally, in reference to Governor Rose Mofford's Executive Order No. 91-6, dated February 14, 1991, we would encourage the BLM to coordinate their riparian management efforts very closely with the Arizona Game and Fish Commission (AGFC). The AGFC, per this executive order, has been tasked with the job of conducting a statewide inventory and classification of all riparian areas and to coordinate the drafting of a statewide riparian management plan.

#### WILD HORSE AND BURRO MANAGEMENT

We strongly support the BLM's direction to reduce excess wild horse and burro numbers to management levels in all herd management areas by October 1992. A reduction of these animals to management levels will result in increased habitat quality and forage availability for all species. This should alleviate the overall physiological stress often experienced by animals in feral v. wildlife

88-2

relationships as a result of competition for available habitat. This stress can be compounded when other environmental factors persist (e.g. prolonged drought), and may result in a number of detrimental effects to wildlife populations.

We recommend the BLM aggressively inventory and monitor wild horse and burro numbers in order to arrive at accurate population estimates. The lack of adequate population data for these species in various herd management areas has often resulted in fewer animals removed than allowed by previously set management levels.

#### FIRE MANAGEMENT

We would recommend that the BLM develop a fire suppression management plan that would identify and guide objectives for fire suppression, prescription burning, and post-burn management in the RMP. Fire can be an extremely effective tool to improve overall habitat quality and plant vigor in dense, decadent chaparral communities when properly designed and managed. Post-burn management should include reseeding with an adequate mixture of both palatable and nonpalatable native grasses and forbs compatible with existing native plant community. We recommend against the reseeding of exotic species. Exotics are very hardy and readily out complete native species, often becoming established in undesirable locations such as riparian areas.

Again, we would like to thank you for the opportunity to review and comment on this Draft RMP/EIS. The Arizona Chapter would appreciate receiving a final copy of this RMP/EIS when completed.

Sincerely,

*Denise L. Baker*  
Denise L. Baker  
Secretary/Treasurer

DLB:RWL:r1



ARIZONA RIPARIAN COUNCIL

Center for Environmental Studies  
Arizona State University  
Tempe, Arizona 85287-1201  
August 12, 1991  
(602) 822-3851  
(602) 870-6754  
(602) 965-2490

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Mr. Carter:

In response to the draft Kingman Resource Area Resource Management Plan and Environmental Impact Statement, the Arizona Riparian Council. The Council is a non-profit organization whose statement of purpose includes the protection and management of riparian systems.

The Council strongly supports your identification of riparian/wetland as an Issue. Overall, we support the Preferred Alternative, but offer the following comments and concerns for your consideration.

1. Riparian habitat condition goals and objectives are weak and do not provide sufficient objective criteria upon which to evaluate future condition. We strongly recommend that the final plan provide clearer guidance on what the terms "optimal riparian habitat condition", "good or better ecological status", and "properly functioning condition" are intended to mean. Possibly an Appendix which provides the public with information on RACE along with the numerical scores that would provide a measure as to whether the aforementioned objectives have been attained.

2. We strongly support your Three Rivers, Wright and Cottonwood Creeks and Burro Creek ACECs. In reading the Objectives in Appendix 18 we suggest that the word minimum be dropped when referring to acquisition of instream flow water rights. The word minimum in reference instream flow water rights is no longer considered appropriate. We also question the need to file a claim after 5 years of monitoring data. One year is generally sufficient with a 3 year monitoring period generally required "to prove" up on the claim. We recommend that instream claims be filed following one year of monitoring data for the Wright and Cottonwood Creek, Burro Creek, Three Rivers, and Hualapai Mountains ACEC.

We also want to commend the Bureau for the strength of their management prescriptions within these riparian ACECs, particularly the withdrawal of mineral entry from the riparian zones, the prohibition of mineral disposal and the restrictions on mineral leasing activity and the necessity for posting bonds.

3. The riparian goals and objectives are centered exclusively on the riparian zone with little or no attention to the watershed conditions. Enlightened approaches to riparian management recognize the close interrelationship between watershed condition and riparian habitat conditions. We strongly recommend that the Kingman Resource Area provide management guidance which recognizes this relationship.

In summary, we support the preferred alternatives and urge you to incorporate the aforementioned points in the final plan. Thank you for your time and consideration.

Sincerely,  
*Andy Laurenzi*  
Andy Laurenzi  
President

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The Arizona  
Native Plant  
Society

August 10, 1991

Mr. Bill Carter  
BLM - Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Box 41206 Sun Station  
Phoenix, Arizona 85071

Dear Mr. Carter:

The Arizona Native Plant Society submits the following comments in response to your draft Kingman Resource Area Resource Management Plan and Environmental Impact Statement. Our organization is a statewide, non-profit dedicated to a wide variety of issues related to the plant resources of Arizona.

In general, we support the proposed preferred alternative, and your attention to Issues #2, #3, #4 and #5 and management concerns #7, #8 and #10. With respect to these issues we address the following specific comments:

Resource Area goals

Page 15. We recommend that more precise language be included in the final plan to better elucidate your goal to restore and maintain 75% of riparian/wetland areas to properly functioning condition or good or better ecological status. Properly functioning condition and ecological status are jargonistic and provide no reasonable standard in a qualitative or quantitative sense that will allow the public to determine if properly functioning condition and good or better ecological status have been attained?

Page 16. We question the appropriateness of the guideline that only 10% of rangelands be maintained in an early seral stage. This guideline may be intended to reduce overgrazing by livestock which we strongly support, but may reduce opportunities to implement prescribed burning practices.

Page 16. We strongly support your goal to use prescribed fire, and recommend that this goal include watershed restoration as a stated purpose for prescribed burning. We also recommend that the plan specify some treatment level expressed in total acres, or a percentage during the next 10-15 years.

Management Guidance Common to all Alternatives

Page 25. We recommend that additional language be included to provide flexibility in assessing the need to suppress fires in T&E species habitat. Some plants species of concern may benefit from fire and management guidance should acknowledge the use of fire as an appropriate and necessary tool for species habitat management.

Alternative 2 (Preferred Alternative)

90-1

Page 43. We strongly object to the planned action within rangeland management that states that State lands that are acquired will be allocated to livestock at the same capacity established by the State prior to the exchange. This policy is in direct conflict with BLM's responsibility to develop appropriate grazing guidelines based upon an environmental analysis. The Arizona Native Plant Society believes that if the BLM does not wish to manage these lands subject to federal laws and regulations pertaining to grazing that they not acquire these lands. We also want to call your attention to the fact that if this language is not deleted from the final plan, that the Society believes this action to be sufficient grounds to consider remedying our concern through the appeals process.

Page 43. We strongly support your retirement of livestock grazing on the Silver Creek, Chino Springs and Alamo allotments.

Areas of Critical Environmental Concern

The Society strongly supports your proposed ACEC recommendations in Alternative 2. We are especially supportive of your management prescriptions that call for withdrawing the Clay Hills ACEC from mineral entry and leasing, and your restrictive minerals management prescriptions for the Black Mountain, White-margined Penstemon Reserve, Three Rivers Riparian and Burro Creek ACECs. Your analyses detailing the special values of these areas are well-done and provide strong support for the designations and management prescriptions listed in Alternative 2.

The Arizona Native Plant Society appreciates the opportunity to provide input to the public land management planning process.

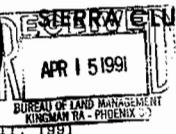
Sincerely,

*William R. Feldman*  
William Feldman  
President

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CONSULTATION AND COORDINATION

91



## SIERRA CLUB - GRAND CANYON CHAPTER

516 East Portland Street  
Phoenix, Arizona 85004

(602) 253-8633

April 11, 1991

BUREAU OF LAND MANAGEMENT  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

RE: Resource Management Plan

To Whom It May Concern:

Thank you for this opportunity to comment on your Resource Management Plan. I confess I have not been able to study the document in great detail, but I read enough to see that you are intending to take some management steps that I feel are quite appropriate. Frankly, I'm quite excited about some of the possibilities.

As the founder of the Mohave Wilderness Association, and as a member of the Steering Committee of the Arizona Wilderness Coalition, I had many opportunities to visit several remote locations in the greater Mohave County area over the past few years. In the Black Mountains, I visited the Warm Springs WSA, the Mount Nutt WSA, the Burns Springs/Black Mountains North WSA, Mount Davis, Mockingbird, and Van Deeman. I have additionally visited the Mount Tipton WSA and other parts of the Cerbat Mountains. I am familiar with the Hualapai Mountains and especially the Wabayuma Peak area. In the Grandwash Cliffs area, I have spent time from the Music Mountain area northward through the Grandwash Cliffs WSA as well as the areas surrounding and including the Grapevine Wash WSA.

As to the latter, I made perhaps two dozen visits. I found extensive evidence of prehistoric use (roasting pits), as well as a variety of beautiful scenery and the tremendous Joshua Tree forest. I helped prepare the proposal to create the Ramparts Wilderness Area which was suggested to Congress. I am sure a copy of that proposal was submitted to your office.

I am familiar with the riparian areas of Peeples Canyon, the Santa Maria River, the Bill Williams River, the Big Sandy, Burro Creek, Frances Creek, along with the surrounding countryside. After reviewing your Draft EIS, I made two trips to the Wright Creek area south and east of Valentine. We located historic and prehistoric sites in great abundance. We were privileged to spot the pronghorn herd (or a part of it) that makes that area its home.

Printed on 100% Recycled Paper

As you can see, I have extensive background in the areas you are responsible for managing. I can make the following general comments. These are all fairly remote and wild places. They all have remarkable scenery, prehistoric and historic sites, and abundant and varied wildlife and plants. The bighorn sheep population in the Black Mountains is thriving, and should be considered a national treasure. The raptor population in the Alamo Lake Complex is unique in all the world. Even my sighting of a desert tortoise at the southeast tip of the Warm Springs Wilderness is deserving of mention.

I laud your proposals to manage these special and sensitive areas. They are well deserving of special protection. I believe Areas of Critical Environmental Concern are a necessary and appropriate tool. I believe you should follow up on your studies and proposals for Wild and Scenic River designations. Wherever you encounter riparian habitats, please make special efforts to preserve these areas.

I look forward to your progress in the managing of our precious resources. Please make note of my new address, and keep me posted on any further developments. Thank you.

Sincerely,

*Craig R. Friesner*  
CRAIG R. FRIESNER  
Staff Lobbyist

CRF/crf

92

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MOHAVE SPORTSMAN CLUB

April 8, 1991

Elaine F. Marquis  
Area Manager  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Ms. Marquis:

The Mohave Sportsman Club has reviewed the Kingman Resource Area Resource Management Plan. We hope our brief comments will assist you with a few difficult decisions.

Our club has 125 members at this time. We also manage and maintain the local rifle range which was originally a BLM R&PP lease.

Regarding your ACEC proposals we strongly support your efforts to establish the following ACEC's listed under alternative II:

Black Mountain  
Western Bajada & Tortoise  
Wright and Cottonwood Creeks Riparian and Cultural  
Cherokee Point Antelope Habitat  
Hualapai Mountain Research Natural Area  
White-Margined Penstemon Research Area  
McCracken Desert Tortoise Habitat  
Poachie Desert Tortoise Habitat  
Aubrey Peak Bighorn Sheep Habitat  
Burro Creek Riparian and Cultural  
Three Rivers Riparian Area

Note! Many of our club members are senior citizens. We would like to keep the option of driving off the road to retrieve big game animals in those ACEC's where you plan to limit vehicle access.

In regard to wild horses and burros, we do not support the idea of a wild horse herd in the Cerbat Mountains. We also wish you would reduce burro numbers in the Black Mountains to 400 or less as soon as possible. Burros should also be removed in historic bighorn sheep habitat along the Santa Maria and Bill Williams rivers. Absent in this RMP is a plan to handle burros in non herd management areas. These animals should be removed immediately and not allowed to multiply and inhabit new areas.

Thank you for the opportunity to comment on this plan.

Sincerely,

*Herb Stipe*  
Herb Stipe  
President MSC

93

4-10-91

*In regard to the RMP for the  
Burro Creek area we are  
adamantly opposed to any  
wild & scenic river designation  
or ACEC designation.*

*Why is grazing not  
represented by the RMP team  
members?*

*Sincerely,*

*Ruth Brimhall  
P.O. Box 554  
Bagdad Az 86321*

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CONSULTATION AND COORDINATION

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Box 553  
Wickenburg, Az. 85358  
April 5, 1991

Kingman Resource Area  
Mgmt Plan  
Environmental Impact Dept.  
Bill Carter, Technical coordinator  
2475 Beverley Ave.  
Kingman, Az. 86401

Dear Area Manager and assistance:

1. No respect, or admission of the Old legal water rights are given on the grazing leases to the rancher.
2. Closing of roads in the wilderness area limits use to people being able to walk there a lot of people unable to walk- but can ride in motorized vehicles. plus a vehicle on the roads do not make that much noise or do damage- you can hear the hiway traffic on Hiway 93 better than you can hear a vehicle on the roads in the country.

94-1 | 3. Failure to show roads or vehicle ways on maps supplied with this draft when and where they exist.. A BIG BIG OMISSION!

4. There is a strong feeling this draft was prepared by wishers and dreamers with their own wishes and special interest in mind instead of the true picture or story of the facts. and NEVER was the weather element mentioned.

5. Water: Who had water even before the time of B.L.M. The rancher has developed and worked on the waters alone and it has been shared by livestock and wildlife and even people when they come along thirsty the B.L.M. comes along after the fact and maybe if you have water they come up with big ideas or funds. MAYBE??

94-2 | 6. WHY do you want to make the rancher the scrape goat?? and out the number of livestock on the McCracken- Poschie turtle habitat.? Cattle don't eat the damn things. It hasn't been proven they eat the same forage. you don't even consider the possible fact that the wild pigs in rooting around turn the turtles upside down and makes then lunch for crows, eagles and buzzards, Plus the coyote, foxes, lions and bobcats can destroy them.

7. Why is the Arrastra Mt. Allotment being used as first the wilderness and 2nd. the turtle habitat. It should be kinda equal- ?

8. Do the turtle pay a personal property tax?? Does the wilderness pay any thing to contribute to your salaries??

Respectfully

Art Rodgers,  
Arrastra Mt. Allotment

*Art Rodgers*

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April 12, 1991

Bureau of Land Management.  
Kingman Area Resource Office  
Gordon Bentley Team Leader

Mr. Bentley

I am in complete agreement with the Mohave Livestock Association in regards to the written comments on the DRAFT of Kingman Resource Management Plan and Environmental Impact Statement.

The DRAFT EIS Language should be rewritten, To continue with the multiple use concept that has worked very well for the last 10 years.

Thank you,  
Frank Allen Hunt  
P.O. Box 189  
Peach Springs, Az.  
86434

*Frank Allen Hunt*

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UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
ECOLOGICAL SERVICES  
3616 W. Thomas, Suite 6  
Phoenix, Arizona 85019

April 12, 1991

MEMORANDUM

TO: Area Manager, Kingman Resource Area, Bureau of Land Management, Kingman, Arizona

FROM: Field Supervisor, Fish and Wildlife Service, Phoenix, Arizona

SUBJECT: Review of Draft Resource Management Plan and Environmental Impact Statement for Kingman Resource Area (EC 90/137)

The Fish and Wildlife Service (FWS) has reviewed the subject draft Resource Management Plan (RMP) and offers the following comments for your consideration.

GENERAL COMMENTS

The draft RMP lays out the management goals for the Kingman Resource Area (KRA) that the Bureau of Land Management (BLM) will use to direct resources management over the next 20 years. We note that some of the documents adopted as part of the RMP/Environmental Impact Statement (EIS) are reaching the end of their expected life. This adoption has two main effects; 1) that of extending the effective lives of these documents without providing for adequate public comment, and 2) that of inhibiting the exploration of new management opportunities and possibilities since the old documents are included in their entirety. We recognize that some of these documents remain valid and include acceptable management practices, however, we suggest the older major EIS's included in the RMP be evaluated for revision at the end of their planning cycle, not at the end of the RMP cycle.

96-1 | Although not specifically mentioned under either Minerals, Wildlife, or Recreation sections of the RMP/EIS, safety of both visitors and animals on public lands is an area of management interest. In this respect, treatments to caves, mines, shelves and similar features to protect human health and safety, and cleaning up mining impacts may adversely affect wildlife use of these areas. Any comprehensive plan for these features should take into consideration wildlife impacts.

96-2 | The glossary needs to contain all words and phrases that are used to describe different management responsibilities. For example, leasable minerals is in the glossary but locatable and saleable minerals are not. What exactly is "mineral material disposal" as mentioned in Table IT-5? Other examples exist. Please revise accordingly. Providing descriptions of terms used in early chapters only in later chapters of the document has limited utility.

2

96-3 | The Areas of Critical Environmental Concern (ACEC's) that are included in the preferred alternative target important wildlife habitats and, if implemented, should provide for effective management of these resources. Were there other ACEC's that were not included? Why are the three cultural ACEC's in Alternative 3 not included in Alternative 2? We suggest all identified ACEC's be recognized and given special consideration.

Considering the range of alternatives presented in the draft RMP, for the most part there are few major differences between them, with the exception of ACEC designations. Perhaps some discussion of why the alternatives are so alike would be instructive. Also, while there were biodiversity and recreation alternatives eliminated from consideration, no mention is made of a commodity based alternative. Do the planning objectives preclude such an alternative?

SPECIFIC COMMENTS

Page 5; Issue 3. The Needed Decisions sections should include a re-evaluation of not only Habitat Management Plans (HMP's), but any decision-making documents or products of such documents that may exist. This is especially important for Area Management Plans (AMP's). Planning Criteria should also evaluate AMP's.

96-4 | Page 9; Management Concern 3. Under this concern, segregations, classifications, and withdrawals appear to be separate types of protective actions. However, in the glossary, segregation is defined as "Any action such as a withdrawal..." If segregation is a distinct protection action, this needs to be clarified. Also this concern appears to be biased toward getting rid of special-use designations such as withdrawal while putting more land under multiple use. We note no planning criteria that would evaluate establishing or enlarging current or potential withdrawals. This concern should be revised to reflect the need to determine what areas should be protected through segregation, classification, or withdrawal. Planning criteria should include provision for land reviews to establish segregation needs.

96-5 | Page 10; Management Concern 7. Should the 13th Planning Criteria read "watershed condition" rather than "watershed productivity?" What is the management strategy difference, if any, between the two terms? The issue of threatened and endangered species should be included in the opening statement.

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CONSULTATION AND COORDINATION

Page 11; Management Concern 9. It would appear to us that the first decision needed with regard to acquiring land would be to establish its best use, i.e., multiple use or withdrawal for special use. Forage allocations should be applicable to all lands and based on established criteria. We suggest a Management Concern be added to determine appropriate use of acquired land. The Needed Decision statement for this concern seems to imply there is no option available to not graze newly acquired lands. Is this true? If not, please alter wording to "Should forage allocations..." from "What forage allocations..."

Page 11; Management Concern 10. Again, the assumption is that ephemeral grazing on all lands is a given, not an option. We suggest the Needed Decision be changed to the following: "Which methods should BLM use in deciding if ephemeral and supplemental licensing of livestock should be allowed..."

Page 15; Introduction. By incorporating the previous grazing EIS's into the RMP, is the BLM extending the operational life of those EIS's? Is this an appropriate action given the changes in resource values, threatened and endangered species, and riparian priorities that BLM has made since the EIS's were finalized? How much longer will it be until these grazing EIS's can be reevaluated - an additional 20 years? At the next RMP revision, will grazing be an integral part? We would prefer to see the grazing EIS's re-evaluated at the end of their operational life and revised to fit the RMP timeframe for revision. For example, assuming a 20-year life, the Cerbat/Black Mountain EIS (1978) would be revised in 1998, then revised in 2011 as part of the RMP revision.

96-6 | Page 15; Resource Area Goals. We suggest inclusion of a specific goal for threatened and endangered or special status species.

Page 17; Management Guidance Common to all Alternatives. Other BLM actions under the RMP that would require Section 7 consultations include land sales or transfers out of Federal ownership.

Page 20; Air Resources. Use restrictions should be evaluated and applied when appropriate in areas of high airborne dust potential.

96-7 | Page 23; Special Status Species Management. We support BLM commitment to monitoring the status of and evaluating effects to listed and candidate species covered by the Endangered Species Act. Please note that the 1988 Amendments to the Endangered Species Act require Federal agencies to monitor category 1 and 2 species.

96-8 | Page 23; Plant Species. We recommend that the BLM develop a HMP for Arizona cliffrose in cooperation with the FWS. The Recovery Plan mentioned in the RMP is a FWS document and not considered binding to the BLM. We believe an aggressive recovery program for Arizona cliffrose could begin without a finalized FWS recovery plan. In the absence of an HMP, the BLM should state in the RMP what the goals of Arizona cliffrose management will be. In addition, we believe the RMP should state that the HMP for Arizona cliffrose, once developed, will be implemented by the BLM.

96-9 | Page 26; Alternative 1 - Public Land Exchange. The constitutional amendment needed for State-Federal land exchanges was defeated in November 1990.

96-10 | Page 30; Vegetative Products. Is there a recommended seed list for rehabilitation of commercial woodlots? Are nonnative species used, or are only native species allowed?

Page 31; Recreation Management - Off-Highway Vehicles (OHV). We believe the use of washes for OHV travel is incompatible with maintenance of natural diversity and wildlife and riparian vegetation management. Drainage systems and their associated vegetation and wildlife richness add an important element of community and species diversity to desert ecosystems. OHV traffic has potentially significant impacts which could severely degrade these critical riparian systems. We strongly recommend that the BLM exclude desert washes from OHV use.

Page 32; Map TT-3. The use of the word "open" for OHV areas on this map is misleading. Instead of "open," the word "limited" may more properly define the situation. There does not appear to be any areas on the KRA fully "open" to OHV use under this alternative.

96-11 | Page 33; Wildlife Habitat Management - Big Game. In determining permitted livestock numbers for a specific allotment, which animals have the highest priority and which have the lowest priority for available forage - livestock, burros, or game species? This priority needs to be addressed in new AMP's as well. What, if any, special management would be done for the elk herd in the Hualapai Mountains?

96-12 | Page 34; Endangered Species. A section on the endangered Arizona cliffrose (*Purshia subintegra*) should be included here. We believe addressing only the endangered animal species in this section is inappropriate.

Page 34: Riparian Area Management. Given that the inventory will not be completed until 1991 and there are constraints on implementation in documents incorporated into this RMP, can the goal of 75 percent or more riparian areas in proper functioning condition by 1997 be met? What is meant by "proper functioning condition?" What will the consequence be if this condition is not met?

96-13 | Page 35: Wild Horse and Burro Management - Plan Actions. For clarification, does the Cerbat HMP allow for 14 horses or is the level higher and is the current herd size in excess of 130 animals?

96-14 | Page 37: Minerals - Plan Actions. Is the approximately 400,000 acres not available for mineral development withdrawn or in land use categories preventing use of the mineral resource? Please identify this acreage.

96-15 | Page 38: Lands - Land Withdrawals and Classifications. Would all the land under PLO 492 be included in the new mineral withdrawal, or would portions become open to mineral entry? We recommend all lands surrounding Alamo Reservoir be retained in a mineral withdrawal status.

Page 40: Linear Rights-of-Way. Are rights-of-way designated for a particular company and/or function usable by other entities needing rights-of-way for other projects? Since the new routes shown on Map TT-6 are mostly (except for the span north of Red Lake) replaceable by existing corridors, why are new ones necessary?

96-16 | Page 42: Watershed Resources. We recommend plans to improve watershed conditions stress the use of appropriate native plant species. We believe use of nonnative plants, even if they are established in the area, is counter-productive to managing for natural diversity.

Page 43: Rangeland Management - Plan Actions. We believe rangeland trend and utilization studies should be implemented on more than newly acquired lands. Recognizing that there are BLM lands with such studies ongoing, our concern is to ensure that all sensitive lands be monitored if grazing (by livestock or burros and wild horses) is allowed. Why should an allotment not have an implemented AMP?

Concerning new lands and the continuation of grazing, we are concerned that the BLM plan does not allow for a timely resolution of grazing/resource issues. Lands being acquired by the BLM under this plan are likely to have high values for special resources. Maintaining livestock pressure at existing (State land) or comparable (private lands) levels for an undetermined period could be counterproductive to the intent of the exchange. We believe that a timetable for assessing

grazing on the lands should be set with a target date of no more than a one or two year post-acquisition period for completion of an AMP. A definition of "controlled" would be helpful to understand how the permittee and their legal and presumed rights fit into the decision. It may also be useful to note that not all newly acquired lands should be grazed because of their special values, regardless of whether they could be grazed.

Page 44: Recreation Management - Plan Actions. Is the Pine Flat picnic/campground site on private land that must first be acquired? How many other sites on the list are not on currently BLM owned lands? Note that the Hualapai Mountains National Back Country Byway (NBCC) is not yet established (as of February 1991).

Page 45: OHV Designation. Since much of the KRA would be given an OHV designation limiting OHV use to existing roads, trails, and washes; we would like to see a plan developed to assess hydrologic changes and degradation of wash banks, wash vegetation, and wildlife values of the area due to this use.

Page 49: Wildlife Habitat Management - Special Status Species Management. Management of the ACEC for Arizona cliffrose will have to contain a special, high-priority commitment by the BLM to prevent habitat and plant-destroying incidents as we have seen in the past. Priority for this ACEC management plan should be very high. Please note the name of this ACEC here for reference.

96-17 |

96-18 |

Page 51-55: Table TT-5. Why is mineral leasing allowed in some new ACEC's when there is a mineral withdrawal also proposed?

96-19 |

The Black Mountains, Clay Hills, and White-margined Penstemon Reserve ACEC's mention development of a "recovery plan" for the Cerbat beard-tongue, Arizona cliffrose, and White-margined penstemon. A recovery plan is the title of a FWS document. We recommend the RMP refer to developing a HMP, which is binding to the BLM, as well as implementing a FWS recovery plan to achieve downlisting and delisting criteria.

96-20 |

Why is grazing only removed from one of the three desert tortoise ACEC's?

We support mineral withdrawals for all of the ACEC's. As experience has shown us, requirements for Mining Plans of Operation (MPO's) do not prevent but only modify or manage impacts due to mining. Sometimes, these impacts can result in the loss of habitat or individuals of listed threatened or endangered species. For example, habitat and individuals of Arizona cliffrose have been lost to mineral exploration several times in the past. We believe it is inappropriate to recognize the outstanding natural and cultural features of these ACEC's, and only give them inadequate protection against mineral entry and destruction of habitat.

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- 96-21 | Page 59; Wild Horse and Burro Management. In the event of conflicts between horse, deer, and livestock use of resource; we would prefer that deer and wild horses be of higher priority than livestock in determining herd size reductions.
- Page 60; Vegetative Products. For an alternative that is termed less restrictive, eliminating firewood and yucca harvest seems inconsistent.
- 96-22 | Page 60; Cultural Resources. Why are these ACEC's only considered here and not in Alternative 2? We believe all ACEC's should be given special consideration/protection regardless of the alternative selected as the final action.
- 96-23 | Page 60; Table TT-8. Why do the three new ACEC's under this alternative have restrictions under the Mineral Materials Sales Act and other ACEC's do not?
- 96-24 | Page 66-75; Table TT-9 - Mineral Management; Item 3. What is mineral material disposal? We request a definition be included in the glossary.
- Lands; Item 3. We would prefer not to see the sale of trespass lands to the trespasser as the primary resolution tool for this concern, as we believe it does little to discourage future trespass.
- 96-25 | Lands; Item 6. Is there also a new right of way corridor for a waterline from Lake Mead to Kingman included in Alternatives 2 and 3?
- 96-26 | Special States Species Management Animal Species. Why are the endangered peregrine falcon and Hualapai Mexican vole not mentioned under Special Status Species Management? Why is implementation of the Desert Tortoise Rangeland Plan (Rangeland Plan) and Arizona Implementation Plan only mentioned as part of Alternative 1? The FWS is concerned that this may not fully represent the original intent of the Rangeland Plan's function and use.
- 96-27 | Page 84; Table TT-13 - Rangeland Vegetation. The 5-year interval on trend monitoring means that some sites may be surveyed less than four times in the 20 year planning horizon of the RMP. Given the ambitious goals for watershed improvement, riparian values, and other vegetative concerns; can an adequate plan to achieve these goals be implemented with such limited monitoring?
- 96-28 | Page 86; Table TT-13 - Wildlife. What monitoring is done on the Hualapai Mountains elk herd? Information on plans for this herd are absent from this RMP, though mentioned on page 113.

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- 96-29 | Page 91; Table TT-14 - Vegetative Products. The discussion for Alternative 3 does not mention the elimination of certain product harvests under the RMP.
- 96-30 | Page 104; Watershed Management. Appendix 15 deals with withdrawals, not grazing allotment condition. Would Category II watersheds be priority ones for improvement to excellent range condition? It seems that critical erosion areas includes some very sensitive habitats. Will these areas be priorities for intensive management to correct the erosion problems?
- Page 131; Impacts to Mineral Development. While we agree that the consolidation of lands in the KRA would benefit mineral operations, it also means that it is easier to lose wildlife habitats and natural vegetation communities to mining operations, some of which may not be reclaimed.
- Page 137; Impacts From Vegetative Products Harvesting. Mitigation of damage to wildlife habitats during harvest does not prevent losses. Hopefully, it trades present damage for future recovery. Since not all wildlife have the same habitat needs, altering the structure of the habitat benefits some species and adversely affects others.
- Page 137; Impacts From Recreation Management. With the limited waterfowl habitat on the KRA, we suggest seasonal use provisions be implemented to assist in the protection of wetland resources at Red Lake?
- 96-31 | Page 139; Impacts From Recreation Management. We are concerned about effects of the Pine Flat Campground on the endangered Hualapai vole. Vole habitat is within the existing campground and is very subject to degradation. Given the extremely limited habitat available for this species, development of this site may not be appropriate.
- 96-32 | Page 142; Impacts to Vegetative Products Management. How can the impacts be the same as those for Alternative 2 when firewood cutting and yucca harvesting, the two primary products, have been eliminated in this alternative?
- 96-33 | Page 145; Impacts From Vegetative Products Management. If erosion, loss of cover, and nesting habitat losses are potentially significant enough to mention here in Alternative 3; they should be more fully discussed in Alternatives 1 and 2.
- 96-34 | Appendix 1. Please include watershed category for each allotment. Is there anything that can be accomplished for custodial allotments? How many of these overlap areas where special management or resources have been highlighted in the RMP?

Appendix 6. The correct spelling of the genus of Broom Rape is Orobanche. The Candidate Category II Yuma puma (Felis concolor browni) should be included.

Appendix 18: ACEC Descriptions - Joshua Tree Forest-Grand Wash Cliffs. We recommend a management prescription to acquire existing claims in prime Joshua tree areas.

96-35 | Western Bajada Tortoise and Cultural. The Mohave Desert tortoise is listed as threatened, not endangered. Consideration should be given to a prescription to modify AMP's as needed for tortoise management. Newly acquired subsurface minerals should be withdrawn.

96-36 | Cherokee Point Antelope Habitat. One of the objectives for this ACEC is to provide high quality livestock forage. Is the primary forage user antelope or livestock? Which of these animals' needs will be given priority? The prescriptions indicate antelope do have priority, but the objectives seem to confuse the issue.

96-37 | Hualapai Mountains Research Natural Area (RNA). Grazing of introduced wildlife, especially elk, may also be affecting the Hualapai vole and its habitats. Occupied sites may not currently be in excellent condition and an objective should be to bring those areas to excellent condition. At this time, we do not support development of camping facilities at Pine Flat. Given the limited area for camping, keeping recreationists out of Hualapai vole habitat may be impossible.

96-38 | McCraken Desert Tortoise Habitat and Poachie Desert Tortoise Habitat. The Mohave Desert tortoise is threatened, not endangered. As a Category I habitat, consideration should be given to withdrawing lands without mining claims and newly acquired mineral rights.

96-39 | Clay Hills RNA. Management prescriptions to eliminate unnecessary roads and trails require that MPO's and mandatory bonding for all mining actions in the existing claims should be included. Due to past problems with BLM protective measures for the cliffrose, special attention to enforcement and implementation of stipulations in MPO's should be made.

96-40 | Appendix 20. Please define "satisfactory" and "unsatisfactory" in the glossary or in the definitions on page 223.

In summary, the direction of the preferred alternative to protect both special resources and fragile desert habitats is very positive and supportable by the FWS. We particularly support the designation of the

ACEC's which, when finalized, will provide management emphasis and direction appropriate for sensitive species and habitats. Please note that the FWS believes specific actions implemented under the RMP will require site-specific environmental compliance.

Thank you for the opportunity to review and comment on this draft RMP. If the FWS can be of further assistance, please contact Ms. Lesley Fitzpatrick or me (Telephone: 602/379-4720 or FTS 261-4720).



Sam F. Spiller

cc: Director, Fish and Wildlife Service, Washington, D.C. (BFA)  
Director, Arizona Game and Fish Department, Phoenix, AZ  
State Director, Bureau of Land Management, Phoenix, AZ  
District Manager, Bureau of Land Management, Phoenix, AZ  
Regional Director, Fish and Wildlife Service, Albuquerque, New Mexico (FWE/HC)

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April 12, 1991

Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401  
Attention: Mr. Gordon Bentley

Re: Draft Kingman Resource Management Plan (RMP)

Dear Mr. Bentley:

The Keith Companies represents parties with interests in more than 40,000 acres of private land in the north central portion of The Kingman Resource Area. The lands are located generally in the Detrital Valley and extending northeast into the Lake Mead National Recreation Area. These lands would be valuable additions to the federal government's holdings. Much of the land has substantial mineral resource potential and recreational values, and it would allow BLM to "block up" its holdings.

The purpose of this letter is to comment on the Draft Resource Management Plan and to propose amendments to the preferred alternative prior to adoption of a final plan. We have evaluated BLM's holdings and have identified three areas that we feel have good potential for private development. We would like to pursue discussions with the BLM to trade the lands mentioned above for lands located in the following areas:

1. BULLHEAD CITY (Township 19 North, Range 21 West, Sections 5,6,7 and 8) These lands are located directly adjacent to rapidly growing Bullhead City. The City is moving to construct a major highway bypass route in the near future which will bring access and urban development to this area. The highway will skirt the northwest corner of Section 6. The preferred alternative RMP designates these lands as an Area of Critical Environmental Concern (ACEC) in recognition of potential habitat for the Desert Tortoise and for the potential of finding cultural artifacts. We understand that your recent studies indicate that these sections are not in the prime habitat areas (Category I) for the tortoise, but are in Category II. Should an exchange involving these lands prove successful, we would work with the BLM to incorporate a habitat protection plan for the key habitat areas into our agreement with the BLM. In addition, we would also include the appropriate measures to insure that a thorough archaeological investigation is conducted prior to any development and that necessary provisions are made to protect any significant cultural

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Planning  
Engineering  
Environmental Services  
Landscape Architecture  
Land Surveying  
Public Works

Mr. Gordon Bentley  
Page Two

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resources. We request that these four Sections be deleted from the ACEC and be included in the list of lands proposed for future disposal.

2. GOLDEN VALLEY (Township 22 North, Range 18 West) Alternative 3 includes most of the BLM's holdings in this township on the list of lands proposed for future disposal, while the list in Alternative 2 contains only 2 sections. Alternative 3 also notes that the disposal of these lands would be through exchange to the State Land Trust. The State no longer has legal authority to exchange land. We request that the lands proposed for disposal in Alternative 3 be included in your final RMP and be made available for exchange to private land owners.
3. MOHAVE VALLEY (Township 18 North, Range 21 West) Alternative 2 calls for a small area along the western edge of this township to be made available for future disposal, whereas Alternative 3 lists 13 additional sections. Significant development activity is currently underway in the Mohave Valley and a great deal more is planned, particularly in light of the Fort Mohave Indian Reservation's plans for casino development on the Nevada side of the Colorado River and their plans for a major wastewater treatment system on the Arizona side. We request that the Alternative 3 list of lands proposed for future disposal be included in the final RMP and that they be made available for exchange to private land owners.

Thank you for the opportunity to comment on the Draft Resource Management Plan. We look forward to working with you to achieve the goals of the final Resource Management Plan.

Sincerely,

THE KEITH COMPANIES-NORTH COUNTIES, INC.  
dba THE KEITH COMPANIES-ARIZONA

*Ross Smith*  
Ross Smith  
Director of Planning



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April 13, 1991

Bill Carter  
B.L.M. Kingman Area Office  
2475 Beverly Ave.  
Kingman, AZ 86401

Dear Mr. Carter:

A few words in support of the Kingman Area B.L.M. draft Resource Management Plan, Alternative 2, inclusion of A.C.E.C. designation for some of western Arizona's most significant riparian areas.

In 1987 I was a student in a Desert Biology class at Yavapai College. A field trip took us to the Burro Creek area. That winter the water was so high that we were unable to continue on the back road from near Wikieup to Bagdad, so we were forced to stay on the west side of Burro Creek. How fortuitous this turned out to be! We stumbled upon a relic Pleistocene plant community of saguaro and one-seed juniper in Kaiser Spring Canyon. The area was so unusual and intriguing that the Biology Department thought it worth a more detailed look. In the fall of 1987, Biology of Pleistocene Deserts was offered. This offered students a chance to participate in a study of vegetation and animals in this unique area of time/space overlap. There did appear to be quite a bit of grazing (the washes were especially impacted, of course) and a good deal of destruction from feral burros. Though there was mining in the area, it did not seem to impact this particular area. This area would most likely not fall within the proposed "riparian" area as it lies approximately one mile west of Burro Creek. There are, reportedly, a few other such relics in Arizona. None of them are protected in any way.

I am aware that several other studies have been done in the Burro Creek area. Both Prescott College and the U.S. Forest Service have gathered some data on unusual plant associations and intrusions in this drainage.

The Burro Creek and Santa Maria River areas have traditionally been a Mecca for birders in Yavapai County. The Prescott Audubon chapter sponsors frequent field trips to those riparian areas. A wide variety of raptors in these drainages make this area unique and, most likely, very important ecologically. The pressure of grazing in these fragile ecosystems has become intense. From the reports of birders and hikers, and from personal observation, there have been very few seedling or sapling cottonwoods in the Kirkland Creek/Santa Maria River or the Burro Creek systems in the past few years. This and the accompanying streambank

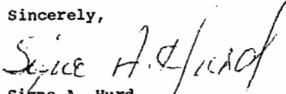
Bill Carter  
April 13, 1991  
Page 2.

destruction by cattle gravely jeopardize this fragile area that is all that remains of a once thriving riparian community along the Bill Williams River Basin in western Arizona. The required Plans of Operation from mining interests in A.C.E.C. areas would further protect these communities.

Short of Wilderness status, your A.C.E.C. proposal appears to be a hopeful approach to the most rapidly dwindling western commodity - riparian habitat.

Thank you, again, for addressing the importance of preserving and, hopefully, restoring these fragile riparian areas by recommending them for A.C.E.C. status.

Sincerely,

  
Signe A. Hurd  
415 W. Gurley St.  
Prescott, AZ 86301

cc: Senator John McCain  
Senator Dennis DeConcini  
Representative Bob Stump

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CONSULTATION AND COORDINATION

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Joseph M. Feller

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April 12, 1991

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

Re: Draft Kingman RMP

Dear Mr. Carter,

I have a few comments on the draft Kingman RMP issued in November, 1990. I regret that I did not have time to write more detailed comments. These comments are my professional opinions as an Associate Professor of Law and a teacher of environmental, natural resources, and public lands law at Arizona State University. They do not necessarily represent the views of the University or the College of Law.

1. I strongly support establishment of the Three Rivers Riparian ACEC. This extraordinary area, with which I am personally familiar, needs and deserves ACEC status.

99-1

ACEC management prescription 19 on page 217 should be extended to include livestock grazing. That is, the BLM should evaluate whether livestock grazing in the ACEC is compatible with the ACEC's goals and objectives, or whether it should be eliminated in part or all of the ACEC.

2. Under the multiple-use mandate of FLPMA, livestock grazing should not be permitted in those areas where its environmental and economic costs exceed its public benefits. Development of an RMP is the appropriate occasion for the BLM to evaluate the costs and benefits of grazing in individual areas to determine in which areas it should be continued and in which it should be discontinued. See 43 U.S.C. §§ 1752(c)(1), 1903(b); 43 C.F.R. § 4100.0-8, BLM Manual § 1622.31.A.1. In the draft RMP, however, the BLM does not perform such evaluations.

99-2

Reliance on determinations made in grazing EIS's that are ten years old or older is not satisfactory. The appropriateness of grazing in individual areas must be evaluated in light of current information, resource values, and public demands.

On page 43, the draft RMP states that allotments may be reserved for wildlife "as opportunities arise." The BLM should not wait for chance opportunities. If there are allotments that are more valuable for wildlife than for livestock, they should be identified in the RMP and retired from livestock grazing.

99-3

3. The draft RMP also states on page 43 that, on lands acquired from the state, the BLM will adopt the grazing capacity set by the state. I believe this provision to be unlawful and an abdication of the BLM's responsibility to manage acquired lands in accordance with applicable federal statutes and regulations.

On acquired lands, the BLM should first make an independent determination of whether livestock grazing would be in the public interest. If it would be, then the BLM should make its own, independent determination of the appropriate stocking level. The procedure that the draft RMP prescribes in the third paragraph on the right-hand column of page 43 would be appropriate.

The issue of livestock grazing on acquired lands is discussed at length in my Protest of a September 11, 1990, proposed decision concerning the Santa Maria Ranch Allotment in the Lower Gila Resource Area. I have enclosed a copy of the protest and I hereby incorporate it by reference into these comments.

Thank you very much for considering these comments.

Sincerely yours,

Joseph M. Feller

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Robert S. Lynch

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April 12, 1991

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, Arizona 86401

Re: Draft Resource Management Plan/Environmental Impact Statement  
(RMP/EIS) for Kingman Resource Area

Dear Mr. Carter:

The following comments on your draft RMP/EIS are directed specifically on the impact of your preferred alternative on the Cavalliere allotment. However, the principles underlying these comments may be applicable generally.

In your proposed alternative, you propose two areas of critical environmental concern (ACEC) that affect the Cavalliere ranch. The first is the Hualapai Mountain Research Natural Area ACEC. This would be established to provide habitat for the Hualapai Mexican vole. The Bureau would designate 3,300 acres of public land as an ACEC. In addition it would acquire 1,186 acres of private land and 1,004 acres of non-federal sub-surface estates (minerals). Your document acknowledges that you view cattle grazing in this area as in direct conflict with vole habitat and would exclude cattle grazing from the area, including the water sources in the area (Grapevine Spring and Upper Bull Flat).

The second area is the White-Margined Penstemon Reserve ACEC. For this ACEC, the Bureau would designate 17,493 acres, acquire 749 acres of private land without minerals and 15,289 acres of private lands with minerals. The Bureau would also acquire 2,114 acres of state land including minerals and an undisclosed amount of mineral rights underneath federal lands.

In both instances, a considerable amount of money would be required in order to block up the areas in question. Given the current financial condition of BLM and the Interior Department and the expected budgetary constraints for next year and the ensuing years in the near term, it is highly unlikely that funds will be available to make the acquisitions in question. The state land in question cannot be acquired by exchange because the State of

100-1

Mr. Bill Carter  
April 12, 1991  
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Arizona, by recent court decision, is no longer empowered to make land exchanges. The area is highly mineralized and has a long history of mining activity. The mineral estates in question are likely to be valued by appraisers at significant amounts. The private lands in question are not only going to be expensive but probably cannot be acquired in the near future except by eminent domain. Without the money appropriated by Congress, that avenue is impossible.

Additionally, the Penstemon is only a C-2 category plant. Thus, drastic efforts concerning its habitat in Arizona are unwarranted.

100-2

The alternatives you display in the draft EIS need to be modified. In cases like the two ACEC designations mentioned above, cooperative agreements could be negotiated with the ranchers that could have considerable beneficial effects for the management objectives pointed toward by ACEC designation. This seems a prudent alternative to a program that will require the infusion of considerable amounts of money for land acquisition and other activities when that money just isn't going to be available. The cost of improving waters and grazing control would be substantially less and such range improvements would not only benefit BLM objectives and the ranches in question but would make scarce financial resources go farther. Your final EIS should display a fourth alternative that bridges the gap between alternatives 1 (existing management) and 2 (preferred alternative) to designate areas where, recognizing limited available federal resources, the reasonable alternative is to negotiate more detailed management techniques with the ranchers in question. Recognizing budgetary constraints in an environmental impact statement is nothing new. Since it is your charge to display all "reasonable" alternatives, displaying an alternative that recognizes the fiscal difficulty of carrying out more expensive strategies is obviously displaying a reasonable alternative.

100-3

Thank you for the opportunity to comment on this important document. Please keep me apprised of future developments on this program and the development of the final EIS.

Sincerely,



Robert S. Lynch

RSL:psr  
cc: Jerre Cavalliere  
Arizona Cattle Growers Association

CONSULTATION AND COORDINATION

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**Santa Fe Pacific Railroad Company**

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April 23, 1991

Mr. Bill Carter  
 Bureau of Land Management  
 Kingman Resource Area  
 2475 Beverly Ave.  
 Kingman, Arizona 86401

Dear Bill:

This letter is in response to BLM's request for comments on its Kingman Resource Area Resource Management Plan and Environmental Impact Statement.

Santa Fe Pacific Railroad Company is the owner of some 1,650,399.04 acres of property interests in Mohave, Yavapai, and Yuma Counties. In Mohave County, 151,782.24 acres of our property is owned in fee. The majority of these lands are within the BLM's Kingman Resource Area. A review of the RMP/EIS indicates that a substantial amount of Santa Fe Pacific's property has been identified for acquisition by BLM.

Santa Fe Pacific has worked long and hard in past years with the BLM in Arizona, particularly in the Kingman Resource Area, with respect to land exchanges. Exchanges totalling some 210,000 acres of mineral interests were accomplished in October, 1988 involving lands in twelve BLM Wilderness Study Areas, the Shivwits Plateau region of the Grand Canyon National Park, the Havasu National Wildlife Refuge, and Navajo relocation ranches in Apache County. These exchanges were made on an acre-for-acre basis with an attempt being made to exchange Santa Fe Pacific into federal mineral interests of similar geologic potential where possible. On April 6, at the dedication ceremony for BLM's Arizona Wilderness system, we exchanged yet more mineral interests so the Upper Burro Creek Wilderness would have no private inholdings. Santa Fe Pacific supported the purpose and need for these exchanges and worked diligently with BLM for over six years in order to see that they were accomplished. The chief issue which caused this process to stretch for such a long time was the difficulty in locating suitable federal mineral interests with which to exchange with Santa Fe Pacific.

A Santa Fe Southern Pacific Company

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As this RMP/EIS calls on Santa Fe Pacific to conduct yet more exchanges with BLM, this document must identify the location of the federal mineral estate statewide in Arizona which BLM has identified to exchange with our company. This EIS will remain deficient until this step is taken. As we are a mining company, not a real estate firm, our requirements for exchange will be the same as they were in the exchange completed in 1988. Santa Fe Pacific will require to be exchanged into unencumbered federal mineral interests of similar resource character and mineral potential as that which Santa Fe Pacific would relinquish. Further, the federal mineral interests must have surface that is not subdivided or it will be unacceptable (the federal surface above our mineral estate which BLM has identified for acquisition now has only one owner-the Federal Government). Subdivided private surface presents an impossible situation when it is necessary to secure access and the proper permissions to conduct mineral exploration or development activities, or if we wish to lease our property to third parties. Further, Santa Fe Pacific is no longer willing to accept an exchange into scattered, unmanageable parcels as we did in Apache, Navajo, and Coconino Counties when we exchanged out of some of our solidly blocked mineral interests within a portion of the Navajo relocation ranches.

With proposed acquisitions of private fee lands and mineral interests as massive as these proposed by BLM, Santa Fe Pacific believes BLM can no longer be constrained in conducting exchanges simply because there may be insufficient federal mineral interest to exchange within a resource area or within a district. As indicated above, Santa Fe Pacific believes BLM must identify lands on a statewide basis. Should BLM determine that insufficient federal lands are available for exchange, then BLM must modify this draft RMP accordingly, and should not impose management prescriptions which will simply result in a de facto taking of the unacquired private property interests.

BLM has identified 336,460 acres for acquisition, yet has identified only 83,760 of federal interests for disposal. How does BLM intend to conduct exchanges with such a large disparity? Santa Fe Pacific believes that this draft RMP/EIS is deficient and will remain so until a sufficient acreage of suitable property interests is identified for disposal. If such an identification cannot be made, then Santa Fe Pacific must support Alternative 1 as the only reasonable alternative.

We would like to make some specific comments as well as our foregoing comments regarding the general deficiency of this document. First, Table 2-5 contains a major conflict with respect to the Black Mountains ACEC. The table indicates that the ACEC has high locatable mineral potential, yet calls for acquiring state and private lands and non-federal minerals. Santa Fe Pacific retained its mineral

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interests in the Black Mountains WSA and did not exchange them in 1988 because of the extremely high mineral potential in this area. To identify our lands now for acquisition, despite BLM's admitted high mineral potential of this area, is highly inconsistent. Simply put, it is as though there is an unwritten policy of removing from multiple use those areas which fail BLM's wilderness suitability test but which meet some highly subjective scenic or biological yardstick. It is disappointing that Santa Fe Pacific's past cooperation could be rewarded in this fashion.

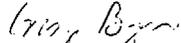
Next, Table 2-7 identifies some 56,758 acres to be withdrawn from mineral entry, much of which is in former WSA's supposedly now returned to multiple use. Given the high mineral potential of much of Mohave County, Santa Fe Pacific believes that this is far too much land which is proposed for withdrawal from potential mineral development. Again, this seems to be merely a mechanism for establishing de facto wilderness.

Enclosed is a just-completed map showing areas of high mineral potential in Mohave, La Paz, and Yavapai Counties. Santa Fe Pacific believes all of the areas so designated must be returned to multiple use and the private lands or interest in these areas be removed from the list of lands which BLM has identified for acquisition in this document.

Finally, Santa Fe Pacific would like to reiterate its support for Alternative 1, as it is the alternative which calls for the least impact to our company's private property.

Thank you for this opportunity to comment.

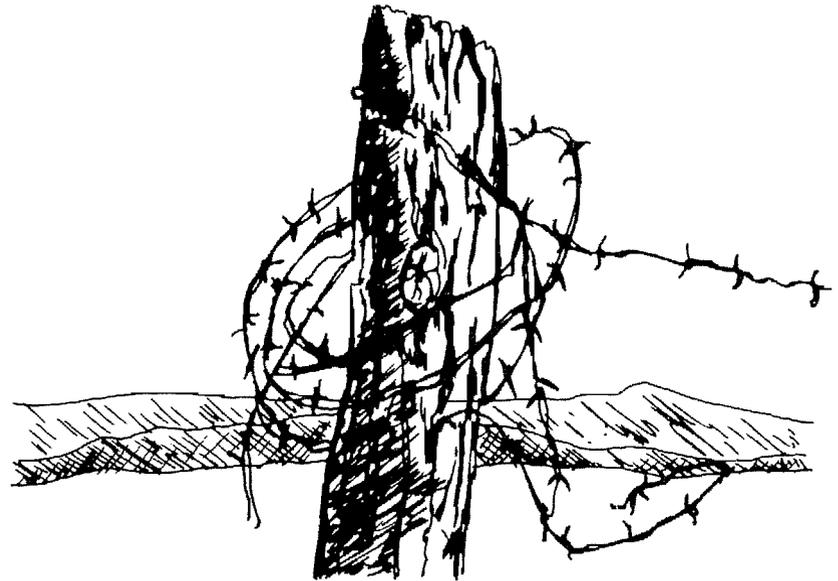
Sincerely,



George Byers  
Vice President-Government Affairs

GB:pt

Enclosure



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STATE OF ARIZONA  
DEPARTMENT OF MINES AND MINERAL RESOURCES

Mineral Building • State Fairgrounds • Phoenix, Arizona 85007  
(602) 255-3791

April 23, 1991

Mr. Bill Carter  
Bureau of Land Management  
Kingman Resource Area Office  
2475 Beverly Avenue  
Kingman, AZ 86401

Dear Mr. Carter:

The following comments are submitted with the hope that the BLM will give serious consideration to the damage to mineral development that is done by additional withdrawal of public lands from mineral entry. The recent inclusion of 1 million plus acres, much of which has high mineral potential, in the 1990 Wilderness Act was a travesty against multiple use doctrine. New withdrawals proposed in the Kingman Resource Area RMP/EIS simply adds to the burden.

To be specific, the following is a list of some of the comments the Arizona Department of Mines and Mineral Resources would like to make.

1. While it may not be intentional, the Kingman Resources Area RMP/EIS hides or at least confuses the plan's impact on present and future mineral resource development. There should have at least been a tabulation in each of the alternatives showing the numbers of acres already withdrawn from mineral entry, and how much additional acreage would be withdrawn by the RMP/EIS.
2. The BLM preferred alternative described in the RMP/EIS would circumvent the will of Congress in the Wilderness Act of 1990.
3. Most mineral entry withdrawals are unnecessary. Disturbances to local environmental conditions can and should be handled on a case by case basis. Those disturbances can be mitigated. For example, it puts an enlightened perspective on the situation, to learn from your Table III-2, page 99, that historically 864 acres have been disturbed by mining activity within the Resource Management Area. Of that, 436 acres have already been reclaimed. This compares to the 92,622 acres proposed for withdrawal from mineral entry.
4. The Arizona Cliffrose (*Pursha subintegra*) raises an example of warped values. Current information indicates that this species prefers to plant its feet in a particularly unique and valuable type of lithium-magnesium clay. There are a number of long standing mining prospect areas of this clay within the proposed withdrawal zone. To prevent the mining of this rare clay would be a travesty on property rights. This is especially true when a reclamation plan could be drawn that would allow for the continued presence and growth of the Arizona Cliffrose.

There are other examples of rampant preservation at the expense of multiple use. Those listed should be sufficient to support a recommendation by the Department of Mines and Mineral Resources that the BLM take another look at all of the resources that occur in the Kingman Management Area, and to give serious consideration to a plan under which all interests would be served.

Yours truly,

  
Leroy E. Kissinger  
Director

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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

FIFE SYMINGTON, GOVERNOR  
RANDOLPH WOOD, P.E., DIRECTOR

April 26, 1991

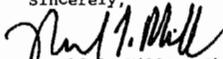
Mr. Bill Carter, Technical Coordinator  
Bureau of Land Management  
Kingman Resource Area  
2475 Beverly Avenue  
Kingman, Arizona 86401

RE: Comments on the Draft Environmental Impact Statements for  
Kingman Resource Area.

Dear Mr. Carter:

The Arizona Department of Environmental Quality, (ADEQ) has reviewed the Draft Environmental Impact Statement on Kingman Resource Area and has concluded that all alternatives represent potentials for unacceptable impacts to both water and land resources. The Department is the responsible agency for administration and implementation of the Arizona Environmental Quality Act and Section 319 of the Clean Water Act (CWA) in the State. However, under the provisions of the Nonpoint Source Water Quality Management Program, the Department can administratively delegate this responsibility through a formalized Memorandum of Understanding (MOU). Until an MOU is formalized the ADEQ requests that the Bureau of Land Management submit to the Department specific plans for activities subject to CWA Section 401 (A) certifications and/or review prior to implementation. The CWA Section 401(A) Program is designed to demonstrate that the proposed programs would not cause or contribute to the violation of State Water Quality Standards for surface water or aquifers.

Sincerely,



Ronald E. Miller, Ph.D.  
Assistant Director  
Office of Water Quality

RLM:MH:pjh

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CONSULTATION AND COORDINATION

## RESPONSES TO PUBLIC COMMENTS

- 1-1 The BLM is working with the Arizona Game and Fish Department and the U.S. Fish and Wildlife Service to determine the status of Mexican voles in the Music Mountains by collecting additional inventory data.
- 6-1 Site-specific actions, such the letter proposes, are addressed when activity plans are developed. No site-specific action will be approved until National Environmental Policy Act compliance procedures have been completed.
- 8-1 The presence of gypsum has been identified in Chapter 3 and on **Map 29**.
- 9-1 Monitoring is implemented on acquired lands as funds become available. The process for determining a grazing capacity for acquired land is outlined in the Range Management section of *Alternative 2*, Chapter II.
- 10-1 *Alternative 1* carries forward corridors designated in the management framework plan only. All of the corridors identified are included in *Alternative 2* and *Alternative 3*, as shown on Map 14.
- 12-1 In the preferred alternative, Cherum Peak and Mount Perkins have been identified; however, due to its proximity to the private site on Aubrey Peak just south of Chicken Springs Road, Groom Peak has been dropped in *Alternative 2*.
- 13-1 The section referred to in the draft document has been corrected. Wild equids will not be managed "at the lowest level needed..." The document now reads; "The herds are managed to assure their free-roaming character, health and self-sustaining ability" (see page 31).
- 13-2 "Management Guidance Common to all Alternatives" has been changed to read; "Where analysis of monitoring data indicates a need for change in the number of grazing animals in areas of multiple species use, allocations will be determined for each species on a case-by-case basis" (see page 31).
- 13-3 The wording has been changed to reflect the management strategy of maintaining a viable population of wild horses within the constraints of their habitat in an ecological balance. The population level will be defined by the level of what the habitat can support.
- 13-4 This document has been changed on page 88 to read; "If proper forage use limits are exceeded when the wild horses are at or below the minimum viable population limit, livestock numbers would be reduced and the BLM would recommend to the Arizona Game and Fish Department that deer numbers be reduced accordingly. If the wild horse population is above the minimum viable level, an equitable reduction in grazing allocation among wild horses, wildlife and livestock would occur."
- 13-5 Forage allocations in dual use areas would be prorated according to the ratios shown in **Table 10**.
- 13-6 Discussions of grazing management practices necessary to improve and maintain soil, watershed, vegetation and wildlife resources have been added to the Rangeland Management sections of Management Guidance, *Alternative 2* (pages 71 and 72) and the Riparian Management section of *Alternative 2* (page 86).
- 13-7 For an analysis of allotment categorization see page 24.
- 13-8 Categorization of watershed condition by grazing allotments is a sufficient enough change of action from existing management as governed by the Cerbat/Black Mountain and Hualapai/Aquarius grazing environmental impact statements to warrant inclusion into the proposed action (*Alternative 2*).
- 13-9 The schedule for inventories and monitoring will not change from one alternative to another. Monitor scheduling is a function of allotment category. Changes in category can occur with variations in the five standard criteria listed on page 24.
- 13-10 The management prescriptions for riparian habitat should provide greater protection for these resources. The proposed management is a significant change from current. Table 18 highlights the differences among the impacts for each alternative.
- 13-11 If proper utilization levels are exceeded in the Cerbat Herd Management Area, numbers of all ungulates would be reduced on an equitable basis.
- 13-12 Discussions about wild horse and burro habitat management have been expanded on page 87.
- 18-1 The text has been changed on page 20 to more accurately outline BLM policy concerning elimination of abandoned mine hazards.
- 19-1 The BLM manages the public lands under the multiple use concept. The various proposals for Upper and Lower Burro creeks represent a balanced management approach for the resource area.

## CHAPTER V

- 20-1 The proposed off-highway vehicle open area at Red Lake has been dropped and a statement made that an open area would be proposed in the future if private lands could be acquired in the playa (see page 76).
- 21-1 The cultural section of Chapter III has been expanded to provide additional information on the Yavapai tribe (see page 172).
- 22-1 On page 65, secs. 4, 5 and 6 are identified as suitable for exchange only with the state. Secs. 7, 8 and 9 are identified as suitable for exchange primarily to the state, but not exclusively. The lands requested under Item (1) in T. 22 N., R. 18 W. have been identified as suitable for exchange primarily to the state, but not exclusively, in *Alternative 2* and suitable only for state exchange in *Alternative 3*. Public lands in T. 22 N., R. 18 W. are within a disposal area, but not identified as being for state exchange only.
- 23-1 See Letter L-1 at the end of the Response to Comments section.
- 25-1 See Chapter III, page 99 of the draft Resource Management Plan/Environmental Impact Statement for a discussion of the Payments in Lieu of Taxes Act funds provided to Mohave County.
- 25-2 Decisions in this document will apply only to public lands administered by the BLM and will not be enforced in any way, either directly or implied, on private, state, other federal or Indian lands (see page 20 and also Letter L-2 at the end of the Response to Comments section).
- 26-1 Wildlife corridors are shown on **Map 20**.
- 26-2 See Letter L-3 at the end of the Response to Comments section.
- 26-3 See Letter L-3 at the end of the Response to Comments section.
- 26-4 The Western Bajada was dropped from consideration as an area of critical environmental concern in *Alternative 2*.
- 26-5 See Letter L-3 at the end of the Response to Comments section.
- 26-6 See Letter L-3 at the end of the Response to Comments section.
- 26-7 The discussion of desert tortoise on page 54 has been expanded to read; "Monitoring data showing a downward population trend, an increase in mortality or a downward trend in key forage plants would trigger a review of grazing management actions in desert tortoise habitat."
- 26-8 Impacts to Special Status Species from Mineral Development on page 204 has been changed to read; "Long-term cumulative impacts could occur on small areas. These impacts could be mitigated."
- 26-9 See Letter L-3 at the end of the Response to Comments section.
- 27-1 See Letter L-4 at the end of the Response to Comments section.
- 28-1 See Letter L-5 at the end of the Response to Comments section.
- 28-2 See Letter L-5 at the end of the Response to Comments section.
- 29-1 See Letter L-6 at the end of the Response to Comments section.
- 29-2 See Letter L-6 at the end of the Response to Comments section.
- 29-3 This document was prepared by an interdisciplinary team represented by all BLM resource specialists at the resource area, district and state office levels. It also reflects the ideas and wishes of many of the general public, user groups, environmental groups and other agencies.
- 29-4 See Letter L-6 at the end of the Response to Comments section.
- 30-1 See Letter L-7 at the end of the Response to Comments section.
- 31-1 See Letter L-8 at the end of the Response to Comments section.
- 39-1 **Initial** forage allocation for desert bighorn sheep and other ungulates in the Black Mountains would be determined based on the ratios shown in **Table 10**. The terms "optimum habitat potential" and "optimum numbers" for bighorn sheep have been removed. Forage would be managed to all ungulates in an equitable fashion.
- 39-2 Desired plant community descriptions would be developed for important wild burro habitat.
- 39-3 See response 39-1.
- 39-4 The term "optimum potential" has been defined in the glossary.
- 39-5 **Page 182** shows the present population of wild burros in the Black Mountains at 890 animals.

## CONSULTATION AND COORDINATION

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|------|---|-------|--|
| 39-6 | This statement has been deleted.  | 53-5  | See response 13-3.   |
| 39-7 | This statement has been changed to state "activity plans."  | 53-6  | The disposal area boundary shown on <b>Map 13</b> has been changed to move it out of the herd management area.   |
| 39-8 | See response 39-1.  | 53-7  | These lands have been proposed for disposal to meet the needs of growing communities nearby. Management of public lands in checkerboard areas is difficult for the public land manager and private landowners. Consolidation of public landownership in areas containing a higher percentage of public lands and higher value natural resources is in the best interest of the public. |
| 39-9 | This suggestion has been incorporated on page 55.   | 53-8  | The discussion of grazing in timber stands has been changed on page 71 of this document to read: "Consideration of the physiological needs of ponderosa pine and mixed conifer stands for regeneration would be incorporated into environmental documents necessary for the approval and development of a coordinated resource management plan."                                       |
| 41-1 | See Letter L-9 at the end of the Response to Comments section.  | 53-9  | Ecological site inventory data have revealed inconsistencies. The location of true ephemeral rangeland, areas containing no more than a minor amount of desirable perennial forage, needs to be defined. Designation of ephemeral range will be consistent with the Special Ephemeral Rule of 1968.  |
| 43-1 | See Letter L-10 at the end of the Response to Comments section.   | 53-10 | A revised eligibility assessment of river segments is shown on pages 174 through 176.  |
| 45-1 | See Letter L-11 at the end of the Response to Comments section.   | 55-1  | Retention areas are based on resource values and are not subject to change. This does not mean the project will not be considered.   |
| 46-1 | See Letter L-12 at the end of the Response to Comments section.   | 55-2  | The herd management area plan boundary is based on the area used by the horses and is not subject to change.   |
| 47-1 | See Letter L-13 at the end of the Response to Comments section.   | 55-3  | This type of project in wilderness is strictly prohibited and it would take an Act of Congress to change the boundary.   |
| 50-1 | See Letter L-14 at the end of the Response to Comments section.   | 60-1  | See Letter L-15 at the end of the Response to Comments section.  |
| 53-1 | BLM planning regulations 43 CFR 1610.3-2(a) require planning documents to be compatible with state policy and plans. The BLM is further mandated by the Federal Clean Water Act of 1989, Public Law 101-144 as amended, to assist states in controlling non-point source pollution from rangelands through the development of Best Management Practices. Grazing management procedures fall into the category of Best Management Practices and guidance is given for range management on pages 24 and 72.           | 62-1  | Management of public resources east of the planning area boundary has been addressed on pages 19.  |
| 53-2 | The Burro Creek Riparian Management Plan and the Bill Williams Riparian Management Area Plan were written subsequent to the Hualapai/Aquarius Grazing Final Environmental Impact Statement. Both riparian plans conform to the grazing environmental impact statement. These three documents, incorporated into this document by reference, are available for review at the Kingman Resource Area office. The question of grazing management in riparian areas has been more adequately covered on pages 72 and 86. | 62-2  | The Minerals section of <i>Alternative 2</i> has been revised to more clearly identify acreages open to mineral development and acreages closed to development.  |
| 53-3 | The reference to state land exchanges has been deleted, see page 34.  | 62-2a | Site-specific environmental analysis and public comment are part of all disposal actions.  |
| 53-4 | The Arizona Desert Wilderness Act of 1990 designated nine wilderness areas in the planning area. <i>Alternative 1</i> would not designate additional special management areas (as defined by the BLM planning regulations).   | 62-2b | Corridors are established in previously disturbed areas where future actions may be directed.  |

## CHAPTER V

- 62-3 See response 53-1.
- 62-4 **Table 16** has been revised to read that grazing systems will comply with state water quality standards.
- 63-1 See response 25-2.
- 71-1 This apparently refers to Section 8 of the Public Rangelands Improvement Act of 1978, Public Law 95-514, which amends Section 402 of the Federal Land Policy and Management Act of 1976. Section 8 of Public Law 95-514 stipulates that development of allotment management plans will be done through consultation, cooperation and coordination with involved parties; it is discussed on pages 25 and 71.
- 72-1 The three complete plans proposed represent a reasonable range of alternatives. Other alternatives were considered, but the interdisciplinary team did not do a further analysis, as stated on page 120.
- 72-2 This proposed alternative would not comply with the intent of the Federal Land Policy and Management Act of 1976, which requires the BLM to manage public resources on a multiple-use basis.
- 72-3 A soil survey has been completed for the southern half of the Kingman Resource Area (see page 28 of the draft Resource Management Plan/Environmental Impact Statement).
- 72-4 Impacts to vegetation are addressed in terms of losses due to surface-disturbing activities, without specifically identifying the species being impacted. On pages 71 and 72 of this document is a discussion of how grazing systems will benefit vegetative conditions.
- 72-4a Public lands are blocked up to enhance and protect resource values. State lands are blocked up to maximize revenue-producing development that supports the state schools, etc., as required by state law.
- 72-4b Corridors are one to two miles wide to allow for expansion and required separation between utilities and topography.
- 72-5 See response 13-7.
- 72-6 Changes have been made on page 71 to reflect that permits would only be issued within limits of sustained use.
- 72-7 The term "wash" has been defined in the glossary.
- 72-8 The proposed stipulations outlined on pages 49 and 204 of the draft Resource Management Plan/Environmental Impact Statement would protect bighorn sheep by restricting mineral lease operations from December 1 to May 31, during the lambing period. Other restrictions controlling road construction, living on-site and reclamation are designed to reduce interaction between humans and bighorn sheep. The information in this document will be used to guide the preparation of site-specific stipulations when a lease is issued.
- 72-9 **Table II-7** on page 58 of the draft Resource Management Plan/Environmental Impact Statement shows the acres of no surface occupancy for each area of critical environmental concern. The management prescriptions listed for each of the areas of critical environmental concern indicate that a no surface occupancy stipulation would be applied to Hualapai vole and Arizona cliffrose habitats, the Carrow and Stephens ranches and one-fourth of a mile on either side of important streams (see Appendix 18 of the draft Resource Management Plan/Environmental Impact Statement).
- 72-10 Map II-12 on page 79 of the draft Resource Management Plan/Environmental Impact Statement indicates that the areas of critical environmental concern for Wright and Cottonwood creeks would be one mile wide, as described in aliquot parts.
- 72-11 Limited and closed off-highway-vehicle designations are defined on page 277 of the draft Resource Management Plan/Environmental Impact Statement. The limited designation closes the area to cross-country travel. Travel on roads and trails under normal conditions is nonimpairing, as is travel in navigable washes. The term "navigable wash" is defined in the glossary.
- 72-12 The focus throughout Chapter IV was on the analysis of environmental impacts of implementing the alternatives. No significant environmental impacts occurring from the implementation of any of the alternative plans were found.
- 74-1 Only the NE1/4 of sec. 7, T. 18 N., R. 21 W. has been identified for recreation and public purposes; however, there are 1,708 acres identified for these actions in Mohave Valley.
- 75-1 As shown in Appendix 12, many of those lands near Yucca would only be exchanged for specific lands with much higher resource values.
- 76-1 This site would be considered a single use site and not potentially valuable for commercial development; therefore it has not been designated, but may be applied for.
- 77-1 See response 53-3.

## CONSULTATION AND COORDINATION

- 77-2 The subject statement is based on water quality data and U.S. Geological Survey information cited in the following reports.
1. Arizona Department of Health Services, 1984.
  2. BLM Technical Note 352.
  3. Aquatic Inventory of the Upper Bill Williams Drainage, Yavapai and Mohave Counties, Arizona, 1979.
  4. Burro Creek Watershed Background Survey and Proposed Intensive and Survey Design. Arizona Department of Health Services, March 1982.
- 77-3 The Wild and Scenic Rivers Act of 1968 defines a river as "a flowing body of water or estuary or a section, portion or tributary thereof, including rivers, streams, runs, kills, rills and small lakes." The Act also defines free-flowing as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping or other modification of the waterway." A river need not have perennial flow in order to meet the eligibility criteria. Intermittent streams already exist within the National Wild and Scenic Rivers System.
- 77-4 See response 53-10.
- 77-5 Factors relating to ineligibility have been included in the revised eligibility assessment on page 176.
- 77-6 Desert tortoise habitat boundaries and categorizations have been delineated based on all known information from historic records, inventory reports and BLM and Arizona Game and Fish Department databases. Map 34 reflects a shift of the tortoise boundary to the south of the Cyprus Bagdad copper mine tailing piles.
- 77-7 The proposed special recreation management area around the Mineral Park historic mining area has been deleted.
- 78-1 Grazing is discussed under proposed management prescriptions for each area of critical environmental concern, including those for the protection of riparian values and tortoise habitat; these are shown on pages 97 through 111 and Table 11. Grazing management is also discussed on pages 71 and 72.
- 79-1 The phrase has been changed to read: "... established policy regarding management of wild free-roaming horses and burros on the public lands."
- 79-2 This paragraph has been rewritten on page 31.
- 79-3 A change has been made on page 31 to state that wild horses and burros will be maintained on public lands to assure the herds' free-roaming character, health and self-sustaining ability.
- 79-4 See responses 13-1 and 13-4.
- 79-5 This statement has been rewritten to read: "Desert bighorn sheep and other ungulates in the Black Mountains and Mount Wilson would be managed at a level which would ensure the continued existence of all ungulate species."
- 79-6 The following sentence has been added: "Monitoring data would continue to be collected and numbers of animals adjusted according to condition of key forage species" (see page 56).
- 79-7 See response 39-1.
- 79-8 The discussion of wild horse numbers in the Cerbat Mountain Herd Management Area has been greatly expanded in two paragraphs on page 87 (also, see response 13-4).
- 79-9 See response 79-8.
- 79-10 See response 13-4.
- 79-11 This alternative has been revised as shown on page 120.
- 79-12 Changes have been made to Map 32 to include several allotments which had been missed in the draft.
- 79-13 This statement has been deleted on page 182.
- 79-14 This statement has been changed to read: "Implementation of the herd management area plans included in the Current Management Alternative would result in a dispersed population at a light stocking rate. This, and the implementation of the wild horse management provisions of the Current Management Alternative, would achieve a thriving natural ecological balance in wild horse, burro and wildlife populations which the BLM considers to be a significant benefit".
- 79-15 This statement has been removed from the discussion on page 203.
- 79-16 On page 205, this statement has been replaced with: "Wild horses and burros managed within an ecological balance should have no impact on special status species."
- 79-17 This discussion has been revised as shown on page 206.
- 79-18 This discussion has been revised on page 217.

## CHAPTER V

- 79-19 The text has been changed on page 220 to remove the statement considered to be inaccurate.
- 79-20 The BLM's Wild Free-Roaming Horse and Burro Program Guidance, January 1983, IIC 5b(1)(a) and (b) states: "Decisions to remove wild horses and burros from herd areas may be appropriate if horse or burro management is found to be incompatible with planned uses of the area... Removal may also be appropriate from herd areas too small to support populations of acceptable effective size... Although wild horses and burros may be totally removed from herd areas, the areas retain their status as herd areas."
- 79-21 The text has been changed on page 228 to state: "Same as under *Alternative 2*."
- 81-1 The benefits accruing to existing grazing management have been described in a more positive light under *Alternative 1* of Chapter IV to reflect this comment.
- 81-2 Based on this comment, changes have been made on page 79 to provide for authorized permit holders to travel off roads, trails and washes to fulfill their permits.
- 81-3 The area encompassing the old Silver Creek Allotment is being proposed as the Bojorquez Wild Burro Range in the Wild and Free-Roaming Horse and Burro Management section under *Alternative 2* in Chapter II.
- 83-1 See response 53-1.
- 83-2 Baseline water quality data found in the Kingman Resource Area office files are incorporated into this document by reference in the Management Situation Analysis. Response 77-2 lists some reports containing water quality data. Water quality is not significantly impacted by any of the alternatives in the Resource Management Plan/Environmental Impact Statement.
- 83-3 See response 6-1.
- 83-4 **Tables 14 and 16** have been revised to show the proposed elimination of livestock grazing on the McCracken and Poachie areas of critical environmental concern under *Alternative 3*.
- 83-5 See response 6-1. Also, potential impacts were analyzed and no significant impacts were identified.
- 83-6 Guidance for preparation of Best Management Practices is given for minerals management on pages 20.
- 83-7 See responses 53-10, 85-2 and 85-3.
- 83-8 The stretch of Burro Creek between Francis and Boulder creeks (mostly within wilderness) has been designated a unique water by the state of Arizona. The Big Sandy, Santa Maria and Bill Williams rivers have been evaluated and were found to not meet water quality standards necessary for designation.
- 83-9 See response 62-3.
- 83-9a Before any actions occur on public lands, a site-specific environmental analysis must be completed addressing impacts of specific projects and may require mitigation to protect resources.
- 83-9b Purpose and need for corridors are discussed in Chapter 1. Site-specific environmental analysis is done on each project.
- 83-10 See response 6-1.
- 84-1 Page 88 now reads that the BLM would "recommend" to the Arizona Game and Fish Department that deer numbers be reduced.
- 84-2 Based on the comment, changes have been made on page 31 to state that wild horses or burros in areas outside of designated herd management areas will be removed as soon as possible after consulting with the landowner.
- 84-3 **Table 17** has been changed to show population census of burros at three-year intervals.
- 84-4 The facilities proposed for the Thimble Butte area have been changed to a wilderness trailhead and day use area (see **Table 8**).
- 84-5 Pine Flat has been dropped from consideration.
- 84-6 A wildlife corridor has been included on Coyote Pass. The suggestions for specific wildlife habitat improvement projects will be considered when an activity plan is developed in cooperation with the city of Kingman, Mohave County and the Arizona Game and Fish Department.
- 84-7 See response 81-2.
- 84-8 Page 30 has been changed to add: "As additional wildlife information is gathered, existing habitat management plans would be updated or revised."
- 84-9 See response 6-1.
- 84-10 The terms have been changed to "semiprimitive motorized and nonmotorized recreation" and are defined in the glossary.

## CONSULTATION AND COORDINATION

- 84-11 See response 6-1.
- 84-12 The change from an "October Fish Count" to a "Fall Fish Count" has been made on page 54.
- 84-13 See response 12-1.
- 84-14 A sampling technique will be used to determine parts per million (ppm) of contamination in water (see Table 17).
- 85-1 See response 53-10.
- 85-2 Interim guidance to protect river segments is discussed on pages 42, 44 and 48 through 51.
- 85-3 The one-quarter-mile corridor and standards to ensure free-flowing values are discussed on pages 42, 44 and 48 through 51.
- 86-1 Seral stage is defined in the glossary.
- 86-2 The process used to determine a grazing capacity for acquired land is outlined on page 72.
- 87-1 See response 53-10.
- 88-1 See response 86-2.
- 88-2 The discussion of emergency fire rehabilitation has been revised to state that burned areas would be seeded with approved native and naturalized seed mixtures (see page 32).
- 90-1 See response 86-2.
- 94-1 The North and South planning area maps in map pockets 1 and 2 in the back of the draft Resource Management Plan/ Environmental Impact Statement are the most detailed maps available to the BLM.
- 94-2 Elimination of grazing was not proposed in the Preferred Alternative, nor is it made a part of the Proposed Plan.
- 96-1 See response 6-1.
- 96-2 Mineral terms are defined in the glossary.
- 96-3 The three cultural areas of critical environmental concern shown in *Alternative 3* were included as part of the larger acreages for the Black Mountains, Wright-Cottonwood creeks and Burro Creek areas of critical environmental concern under *Alternative 2*.
- 96-4 Segregation, classification and withdrawal are defined in the glossary.
- 96-5 Watershed productivity has been changed to watershed condition in the second to last planning criteria of Management Concern 7 on page 11.
- 96-6 A new resource area goal dealing with threatened and endangered species has been added on page 18.
- 96-7 Category 1 and 2 species have been added to Management Guidance on page 29 and to Table 17.
- 96-8 The recovery plan, when finalized, will be incorporated into a habitat management plan, which will then be implemented (see page 30).
- 96-9 See response 53-3.
- 96-10 The discussion of seeding cutover areas on page 39 has been changed to clarify that native and naturalized plant species will be used.
- 96-11 See response 79-4.
- 96-12 A discussion of Arizona cliffrose has been added to the Special Status Species Management section of *Alternative 1* on page 53.
- 96-13 The current situation is a draft Cerbat Herd Management Area Plan which proposed 90 horses, a grazing environmental impact statement which proposed 14 horses and approximately 130 horses actually using the area in 1990.
- 96-14 The acres of publicly owned minerals open to various minerals actions or closed to activity are more accurately discussed on page 60.
- 96-15 All federal minerals proposed for release from withdrawal by Public Land Order 492 would be proposed for withdrawal when the area is returned to full management of the natural resources by the BLM.
- 96-16 Plans to improve watershed conditions would stress the use of appropriate native and naturalized plant species (see page 70).
- 96-17 The name of the Clay Hills Area of Critical Environmental Concern has been added to page 85.
- 96-18 Mineral leasing in riparian areas of critical environmental concern refers to a no surface occupancy stipulation for oil and gas, potassium, sodium, phosphates, etc., while withdrawal for mineral entry refers to locatable minerals such as gold, silver, copper, lead, etc. Extraction of leasable minerals can occur without damage to protected resources, because of the no surface occupancy stipulations.

## CHAPTER V

- 96-19 An area of critical environmental concern plan will be developed for the areas containing the *Cerbat beard-tongue*, *white margined penstemon* and *Arizona cliffrose*. Management prescription for these three species will be incorporated in these plans. For Arizona cliffrose, the specific provisions in the draft recovery plan will be incorporated in the area of critical environmental concern plan (see page 110 and **Table 11**).
- 96-20 In the Western Bajada region, the Resource Management Plan is formalizing a long-term existing action to close the area to livestock grazing.
- 96-21 See responses 13-1 and 13-4.
- 96-22 See response 96-3.
- 96-23 **Table 14** has been changed to remove the language concerning the Mineral Materials Sales Act in the lands column. The proper language existed in the minerals column for the Cottonwood Mountains and Black Butte areas of critical environmental concern. This language has also been added to the minerals column of the Silver Creek Area of Critical Environmental Concern.
- 96-24 The term "mineral material disposal" is defined in the glossary.
- 96-25 The corridor for the Lake Mead to Kingman water pipeline has been added to **Table 16**.
- 96-26 The Special Status Species section of *Alternative 2* directs the reader to the Special Management Areas section of *Alternative 2* for a discussion of how management prescriptions in specific areas of critical environmental concern would protect the peregrine falcon and Hualapai Mexican vole. Actions in *Alternative 1* are brought forward in *Alternative 2* by the statement: "This alternative is the same as under *Alternative 1* with the additional ..." **Table 16** has been updated to include a discussion of changes affecting the Hualapai Mexican vole, bald eagle and peregrine falcon.
- 96-27 Changes in vegetation occur very slowly in arid regions. Monitoring more frequently than at five-year intervals has been shown to provide little additional information. Trend in riparian areas is monitored on a yearly basis (see **Table 17**).
- 96-28 A discussion has been added to page 83, stating that the BLM would work with the Arizona Game and Fish Department and the U.S. Fish and Wildlife Service to incorporate new information on elk management into the existing habitat management plan in the Hualapai Mountains.
- 96-29 **Table 18** has been changed to include the impacts of eliminating firewood cutting and yucca harvest.
- 96-30 The citation in Chapter III has been changed to Appendix 19. The discussion of watershed categorization in the Watershed section of *Alternative 2* on page 70 has been changed to state: "Highest priority would be given to Category IV allotments, followed by allotments in category II."
- 96-31 See response 84-5.
- 96-32 The discussion of the Impacts to Local Economy has been eliminated in Chapter IV and replaced by Impacts to Socioeconomic Factors. Impacts to Vegetative Products Management from the elimination of firewood cutting and yucca harvest are discussed on page 223.
- 96-33 Impacts of vegetative harvest on wildlife habitat have been more thoroughly discussed in *Alternative 1* on page 202. The discussion for *Alternative 2* on page 215 has been further clarified.
- 96-34 A discussion of Category C allotments in areas of critical environmental concern is shown in the Rangeland Management section of *Alternative 2* on page 72.
- 96-35 The word "threatened" has been substituted for "endangered" in the relevance statement for the Western Bajada Area of Critical Environmental Concern.
- 96-36 The Cherokee Point Area of Critical Environmental Concern has been dropped from consideration in *Alternative 2* and moved to *Alternative 3*. Area of critical environmental concern objectives have been clarified in *Alternative 3* (see **Table 14**).
- 96-37 The BLM will monitor the impacts of elk, deer and livestock grazing on vole habitat as stated on pages 102 and 103 (see also comment 84-5).
- 96-38 The word "threatened" has been substituted for "endangered" in the relevance statement for the McCracken and Poachie areas of critical environmental concern.
- 96-39 Mining plans of operations and mandatory bonding have been added to the management prescriptions for the Clay Hills Area of Critical Environmental Concern.
- 96-40 The terms "satisfactory" and "unsatisfactory" referring to watershed condition have been defined in the glossary.
- 97-1 See response 22-1.

- 99-1 Livestock management is discussed in Management Prescription 13 of page 217 of the draft Resource Management Plan/Environmental Impact Statement. The statement that livestock would be managed to achieve goals and objectives of the area of critical environmental concern means grazing must be compatible with the unique values found in the area.
- 99-2 Grazing as an appropriate use in riparian areas was evaluated in the grazing environmental impact statements. They are brought forward into the Resource Management Plan and incorporated by reference, an appropriate tiering technique.
- 99-3 See response 86-2.
- 100-1 See response 13-3.
- 100-2 See response 71-1.
- 100-3 The alternative suggested is not necessary as any specific action analyzed in the Resource Management Plan/Environmental Impact Statement alternatives can be selected for the proposed plan by the decisionmaker.
- 101-1 BLM land use plans must identify lands "suitable" for acquisition based on natural resource values and manageability with adjacent public lands before an exchange can take place. This does not mean that the lands must be acquired. Private landowners must be willing parties to any proposed exchange.
- 102-1 Existing withdrawals are discussed under Land Withdrawals and Classifications on page 38 of the draft Resource Management Plan/Environmental Impact Statement and in Table 1 under Wilderness Management of this document. Mineral withdrawals in the proposed alternative are shown in Table 12 and discussed in the Minerals section on page 60 of this document.



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THE DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

DRAFT RESOURCE MANAGEMENT PLAN/  
ENVIRONMENTAL IMPACT STATEMENT  
for the  
KINGMAN RESOURCE AREA

REPORTER'S TRANSCRIPT OF PROCEEDINGS

**ORIGINAL**

Public hearing  
January 15, 1991  
7:00 p.m.

Maricopa Board of Supervisors  
Auditorium  
205 West Jefferson  
Phoenix, Arizona

SOUTHWEST REPORTING

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MR. BRADY: Ladies and gentlemen, this public hearing will now come to order. My name is Ray Brady, Bureau of Land Management District Manager in Safford District here in Arizona. I've been requested to assist with this hearing this evening.

Tonight's hearing is being conducted under the authority of the Federal Land Policy Management Act and in accordance with established Land Management procedures. This formal public hearing is being held to obtain comments on the draft Kingman resource area resource management plan and the environmental impact statement prepared by the BLM's Kingman resource area, Phoenix district. Release of the draft resource management plan and the environmental impact statement marks the beginning of a 90-day comment period which ends on March 8th, 1991.

Public notice of the hearing this evening in Phoenix and on Thursday evening in Kingman has been advertised in the local media. Notice was also published in the Federal Register. Additional informal public meetings will be held in Bullhead City, Bagdad and Dolan Springs. Written comments on this draft resource management plan and environmental impact statement can be provided to BLM in addition to any oral statements that will be provided at this oral hearing this evening.

The official Court Reporter who is seated

SOUTHWEST REPORTING

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BE IT REMEMBERED that heretofore on the 15th day of January, 1991, commencing at 7:10 p.m., at the Maricopa Board of Supervisors Auditorium, 205 West Jefferson, Phoenix, Arizona, the Public Hearing on the Bureau of Land Management Kingman Draft Resource Management Plan/Environmental Impact Statement was held.

Mr. Ray A. Brady, Hearing Officer, and Ms. Elaine Marquis presided.

\* \* \* \* \*

(Whereupon, the following proceedings ensued.)

SOUTHWEST REPORTING

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on my right is Melinda Songstad. She will prepare a verbatim transcript of everything that is said this evening. If you wish to obtain a copy of the complete transcript, you should make your own arrangements with the reporter after the hearing this evening.

The purpose of this hearing centers on two issues: first, are the proposed actions as depicted in the draft resource management plan suitable; second, is the draft environmental impact statement adequate. Your comments on either issue will be appreciated. Although the draft plan includes a preferred alternative, the final plan will consider all public comments that are received.

Now, for a few words about procedure, I hope most of you have signed the attendance sheet as you came into the room. If you have not done so, I would like you to sign it before you leave. Also, if you would like to make a statement this evening, we would like to have a record of that on the attendance sheet. This hearing is not a debate, a trial, or a question and answer meeting; it is an advisory hearing, and all interested parties may present statements or provide other information pertinent to the draft plan.

There will be no cross-examinations from the audience, but if anyone fails to understand any statement from any speaker, you may direct a clarifying question to me and I will determine if it is pertinent. This may seem

SOUTHWEST REPORTING

1 overly formal, but it is intended to give everyone a fair and <sup>5</sup>  
 2 reasonable opportunity to present his or her views.  
 3           When I have finished with my opening  
 4 statement, I will call on a Bureau of Land Management  
 5 representative to say a few words about BLM's proposed  
 6 action. That presentation should take about five minutes.  
 7 Then I will call upon individuals who have indicated that  
 8 they wish to make a statement this evening.  
 9           In view of the limited number of people  
 10 that we have this evening, if you could limit your statements  
 11 to about ten minutes, that would be appropriate. If you  
 12 cannot express all of your comments in that length of time,  
 13 you may submit further comments in writing. Any written  
 14 statements submitted this evening will be included in the  
 15 official transcript and will be considered on the same basis  
 16 as any oral comments.  
 17           You may also submit follow-up written  
 18 comments until March 8th, and these will also be considered  
 19 fully. Written comments should be addressed to the BLM  
 20 Office, Kingman Resource Area, 2475 Beverly Avenue, Kingman,  
 21 Arizona, and the zip is 86401.  
 22           Now, I would like to introduce Elaine  
 23 Marquis, who is the BLM Kingman area manager, for a few  
 24 comments. Elaine.  
 25           MS. MARQUIS: Thank you, Mr. Brady. The

SOUTHWEST REPORTING

1 increase in population in Mohave County, we have an increased <sup>7</sup>  
 2 desire or impact, I should say, on recreation uses. On one  
 3 of them we have identified some trails for hiking and biking.  
 4 There are campgrounds, both primitive and concessions,  
 5 interpretive sites, three back-country byways, seven special  
 6 recreation management areas. And we would establish, or the  
 7 plan would establish a Kingman regional park, which is a  
 8 joint venture to the city, the county, and the BLM.  
 9           There is also an additional 84,000 acres  
 10 identified on the third alternative for disposal, land  
 11 disposal through exchange recreation and public purpose or  
 12 sale. Our preferred method is identified as exchange of  
 13 recreation and public purpose. The resource area plan also  
 14 designates the off-highway use for the whole resource area.  
 15 It identifies two areas. It's completely open, covering  
 16 about 5700 acres. The designation of wilderness, actually  
 17 closes 350,000 acres to vehicular use in all. We have not  
 18 identified any additional acreage closed beyond what is  
 19 designated by wilderness. So that leaves about 2.1 million  
 20 acres designated as limited. And we have designated a  
 21 limitation to existing roads, trails, and washes. In some of  
 22 our critical tortoise habitat areas we have actually  
 23 identified certain washes as closed to vehicles also.  
 24           And this is more or less just a synopsis  
 25 and a brief highlight of our preferred alternative.

SOUTHWEST REPORTING

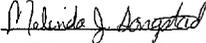
1 preferred alternative is alternative number 2, and it <sup>6</sup>  
 2 represents a continued use in management of the natural

1 Alternative 3 also identifies most of these uses and items <sup>8</sup>  
 2 that I have just spoken of, but we have a different degree of

1 MR. BRADY: Would you like to respond to <sup>9</sup>  
 2 that, Elaine?  
 3 MS. MARQUIS: Scott, my understanding is  
 4 that you had desired to provide a recorder --  
 5 MR. LEWIS: Yes. That was the intent.  
 6 MS. MARQUIS: -- at your expense.  
 7 MR. LEWIS: Yes, at our expense.  
 8 MS. MARQUIS: We did not see any reason why  
 9 that couldn't occur. We were trying to decide this day as to  
 10 the format. If a recorder would be there, did you want that  
 11 recording submitted to BLM for us to incorporate into the  
 12 document?  
 13 MR. LEWIS: Yes, sir. That is our  
 14 intention, yes.  
 15 MS. MARQUIS: We will work out the details  
 16 on how to form that meeting on the phone lines. So there is  
 17 no problem with that.  
 18 MR. LEWIS: Will there be a need then for  
 19 public notice too?  
 20 MS. MARQUIS: We are looking into that.  
 21 MR. LEWIS: Okay.  
 22 MS. MARQUIS: I don't think so, but we will  
 23 certainly look into it.  
 24 MR. LEWIS: Okay.  
 25 MR. BRADY: Could you state for the record

SOUTHWEST REPORTING

11

1 STATE OF ARIZONA }  
 2 COUNTY OF MARICOPA } SS.  
 3  
 4 BE IT REMEMBERED that heretofore, on the 25th day  
 5 of January, 1991, at the time and place aforesaid, the  
 6 foregoing proceedings were stenographically recorded by me or  
 7 under my direction into the 10 foregoing pages of printed  
 8 matter, and that the same contain a full, true and accurate  
 9 transcription of said proceedings all to the best of my skill  
 10 and ability.  
 11  
 12 DATED at Phoenix, Arizona, this 30th day of  
 13 January, 1991.  
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 16 MELINDA J. SONGSTAD  
 17 Notary Public  
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SOUTHWEST REPORTING

1 the date that meeting in Bagdad will take place? <sup>10</sup>  
 2 MR. LEWIS: Yeah. Wednesday, January 23rd,  
 3 1991, at 7:00 p.m. in Bagdad, Arizona. I will reserve  
 4 further comment until either the Kingman or Bagdad meetings.  
 5 Thank you, Mr. Brady and Miss Marquis.  
 6 MR. BRADY: Thank you, Mr. Lewis.  
 7 Are there any other individuals that would  
 8 like to make a statement this evening?  
 9 (Pause.)  
 10 Bill Carter, do we have anyone else  
 11 indicated on the sign-in sheet who would wish to make a  
 12 statement?  
 13 MR. CARTER: No.  
 14 MR. BRADY: I see no other individuals that  
 15 have indicated a willingness to make statements this evening.  
 16 I would like to make an announcement that there will be  
 17 another hearing in Kingman on Thursday evening at 7:00 p.m.  
 18 to hear additional statements on the draft resource  
 19 management plan and environmental impact statement.  
 20 There being no other people wishing to  
 21 testify, I hereby close the hearing. Anyone wishing to ask  
 22 questions of the BLM people that are here this evening are  
 23 welcome to do so, and I thank you for your attendance this  
 24 evening. Thank you very much.  
 25 (Whereupon, hearing concluded at 7:25 p.m.)

SOUTHWEST REPORTING



**B**

**ORIGINAL**

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1 BUREAU OF LAND MANAGEMENT HEARING  
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 12 TAKEN ON THURSDAY, JANUARY 17, 1991  
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 14 AT 400 GRANDVIEW  
 15 KINGMAN, ARIZONA  
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 17 AT 7:06 P.M.  
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 24 REPORTED BY: JANICE MINER, COURT REPORTER  
 25

*Associated Reporting of Mohave County*  
 PO BOX 1236  
 LAKE HAVASU CITY, ARIZONA 86403  
 (602) 855-1356

3

1 MR. BRADY: LADIES AND GENTLEMEN, THIS PUBLIC  
 2 HEARING WILL NOW COME TO ORDER. I AM RAY BRADY, B.L.M.  
 3 DISTRICT MANAGER, WITH THE SAFFORD DISTRICT IN ARIZONA. I  
 4 HAVE BEEN REQUESTED TO ASSIST IN THIS HEARING THIS EVENING.  
 5 TONIGHT'S HEARING IS BEING CONDUCTED UNDER THE  
 6 AUTHORITY OF THE FEDERAL LAND POLICY AND MANAGEMENT ACT AND  
 7 IN ACCORDANCE WITH ESTABLISHED B.L.M. PROCEDURES.  
 8 THIS FORMAL PUBLIC HEARING IS BEING HELD TO OBTAIN  
 9 COMMENTS ON THE DRAFT KINGMAN RESOURCE AREA RESOURCE  
 10 MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT PREPARED  
 11 BY THE BUREAU OF LAND MANAGEMENT'S KINGMAN RESOURCE AREA,  
 12 PHOENIX DISTRICT.  
 13 RELEASE OF THE DRAFT RESOURCE MANAGEMENT PLAN AND  
 14 E.I.S. MARKS THE BEGINNING OF A 90-DAY COMMENT PERIOD WHICH  
 15 ENDS ON MARCH 8TH, 1991.  
 16 PUBLIC NOTICE OF THE HEARING THIS EVENING IN  
 17 KINGMAN HAS BEEN ADVERTISED IN THE LOCAL MEDIA. NOTICE WAS  
 18 ALSO PUBLISHED IN THE FEDERAL REGISTER. ADDITIONAL INFORMAL  
 19 PUBLIC MEETINGS WILL BE HELD IN BULLHEAD CITY, BAGDAD, AND  
 20 DOLAN SPRINGS.  
 21 WRITTEN COMMENTS ON THE DRAFT RESOURCE MANAGEMENT  
 22 PLAN AND ENVIRONMENTAL IMPACT STATEMENT CAN BE PROVIDED TO  
 23 B.L.M. IN ADDITION TO ANY ORAL STATEMENTS THAT YOU WILL  
 24 PROVIDE THIS EVENING.  
 25 THE OFFICIAL REPORTER, WHO IS SEATED ON MY RIGHT,

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 (602) 855-1356

2

1 APPEARANCES:  
 2  
 3 HEARING OFFICER: RAY A. BRADY, DISTRICT MANAGER  
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 5 B.L.M. REPRESENTATIVE: ELAINE F. MARQUIS, AREA MANAGER  
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 8 I N D E X  
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 10 WITNESSES  
 11 FRANK HUNT 10  
 12 ELNO D. ROUNDY 13  
 13 ROBERT HARRISON 17  
 14 MIKE GROSS 21  
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1 IS JANICE MINER. SHE WILL PREPARE A VERBATIM TRANSCRIPT OF  
 2 EVERYTHING THAT IS SAID THIS EVENING. IF YOU WISH TO OBTAIN  
 3 A PERSONAL COPY OF THE COMPLETE TRANSCRIPT, YOU SHOULD MAKE  
 4 YOUR OWN ARRANGEMENTS WITH THE REPORTER AFTER THE HEARING.  
 5 THE PURPOSE OF THE HEARING CENTERS ON TWO ISSUES.  
 6 FIRST, ARE THE PROPOSED ACTIONS AS DEPICTED IN THE DRAFT  
 7 RESOURCE MANAGEMENT PLAN SUITABLE? SECOND, IS THE DRAFT  
 8 ENVIRONMENTAL IMPACT STATEMENT ADEQUATE?  
 9 YOUR COMMENTS ON EITHER ISSUE WILL BE APPRECIATED.  
 10 ALTHOUGH THE DRAFT PLAN INCLUDES A PREFERRED ALTERNATIVE,  
 11 THE FINAL PLAN WILL CONSIDER ALL PUBLIC COMMENTS RECEIVED.  
 12 NOW, FOR A FEW WORDS ABOUT PROCEDURE. I THINK  
 13 EVERYONE HAS SIGNED IN THE ATTENDANCE SHEET AS YOU ENTERED  
 14 THE ROOM. IF YOU'VE NOT DONE SO, I WOULD LIKE ANYONE WHO  
 15 DID NOT DO THIS TO SIGN THESE SHEETS OR THE ONE OUT BY THE  
 16 FRONT DOOR.  
 17 THIS HEARING IS NOT A DEBATE, A TRIAL OR A  
 18 QUESTION AND ANSWER MEETING. IT IS AN ADVISORY HEARING AND  
 19 ALL INTERESTED PERSONS MAY PRESENT STATEMENTS OR PROVIDE  
 20 OTHER INFORMATION PERTINENT TO THE DRAFT PLAN.  
 21 THERE WILL BE NO CROSS-EXAMINATION FROM THE  
 22 AUDIENCE, BUT IF ANYONE FAILS TO UNDERSTAND THE STATEMENT OF  
 23 ANY SPEAKER, IF YOU COULD DIRECT THE CLARIFYING QUESTION TO  
 24 ME, THEN I WILL DETERMINE WHETHER IT'S A PERTINENT QUESTION  
 25 TO BE RESOLVED.

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1 THIS MAY SEEM OVERLY FORMAL, BUT IT IS INTENDED TO  
2 GIVE EVERYONE A FAIR AND REASONABLE OPPORTUNITY TO PRESENT  
3 HIS OR HER VIEWS.

4 WHEN I FINISH MAKING MY OPENING STATEMENT, I WILL  
5 CALL UPON A BUREAU OF LAND MANAGEMENT REPRESENTATIVE TO SAY  
6 A FEW WORDS ABOUT THE PROPOSED ACTION. THAT PRESENTATION  
7 SHOULD TAKE ABOUT FIVE MINUTES. THEN I WILL CALL UPON  
8 INDIVIDUALS WHO HAVE INDICATED THEY WISH TO MAKE A STATEMENT  
9 THIS EVENING.

10 IN VIEW OF THE NUMBER OF PEOPLE THAT WE HAVE HERE  
11 THIS EVENING, I WOULD REQUEST THAT YOU LIMIT YOUR TIME TO  
12 ABOUT FIVE MINUTES. IF YOU CANNOT EXPRESS ALL OF YOUR  
13 COMMENTS IN THAT LENGTH OF TIME, YOU MAY SUBMIT FURTHER  
14 COMMENTS IN WRITING.

15 ANY WRITTEN STATEMENTS SUBMITTED THIS EVENING WILL  
16 BE INCLUDED IN THE TRANSCRIPT AND WILL BE CONSIDERED ON THE  
17 SAME BASIS AS ANY ORAL COMMENTS PROVIDED. YOU MAY ALSO  
18 SUBMIT FOLLOW-UP WRITTEN COMMENTS UNTIL MARCH 8TH AND THESE  
19 ALSO WILL BE CONSIDERED FULLY.

20 ANY WRITTEN COMMENTS SHOULD BE ADDRESSED TO THE  
21 B.L.M. KINGMAN RESOURCE AREA OFFICE, 2475 BEVERLY AVENUE,  
22 KINGMAN, ARIZONA 86401.

23 NOW, I WOULD LIKE TO INTRODUCE ELAINE MARQUIS, THE  
24 KINGMAN RESOURCE AREA MANAGER, FOR A FEW COMMENTS.

25 MS. MARQUIS: THANK YOU, RAY. I'D LIKE TO

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2

1 TORTOISE AND RIPARIAN HABITATS THAT WE HAVE.

2 WE'VE IDENTIFIED FIVE RIVERS AND STREAMS AS  
3 ELIGIBLE TO BE STUDIED FOR WILD AND SCENIC RIVER  
4 DESIGNATIONS. WE HAVE ALSO DESIGNATED TEN WILDLIFE MOVEMENT  
5 CORRIDORS TO TRY TO ENSURE THAT ANY ACTIONS THAT WE TAKE OR  
6 THE PUBLIC REQUIRES OR REQUESTS FROM US IN THE FUTURE DOES  
7 NOT ACTUALLY FORM AN ISOLATED OR ISLAND HABITAT FOR WILDLIFE  
8 BUT THAT WE HAVE CONTINUAL MOVEMENT THAT IS SO GREATLY  
9 NEEDED.

10 THE PASSAGE OF THE ARIZONA WILDERNESS ACT IN  
11 NOVEMBER ACTUALLY FURTHER PROTECTS ABOUT 350,000 ACRES IN  
12 THE RESOURCE AREA WITH THE DESIGNATION OF NINE WILDERNESS  
13 AREAS.

14 NOW, IN ADDITION WITH THESE PROTECTION MEASURES,  
15 WE CONTINUE WITH ALMOST ALL AS IT IS--THE CURRENT MANAGEMENT  
16 AS IT IS WITH SOME ADDED USES TO THE PUBLIC LAND OR  
17 MODIFICATION TO THESE USES.

18 NOW, THE CURRENT MANAGEMENT IS REFLECTED IN THE  
19 DOCUMENT AS ALTERNATIVE ONE; AND TO THIS CURRENT MANAGEMENT,  
20 WE'VE ADDED SOME RECREATIONAL MEASURES. MOHAVE COUNTY HAS  
21 GROWN TREMENDOUSLY IN THE LAST FEW YEARS. THERE'S A  
22 DEFINITE INCREASE IN RECREATIONAL USE BY THE INHABITANTS OF  
23 MOHAVE COUNTY AND NEIGHBORING CALIFORNIA AND LAS VEGAS IN  
24 PARTICULAR.

25 WE'VE IDENTIFIED SOME DAY USE AREAS, SOME

*Associated Reporting of Mohave County*

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(602) 855-1368

1

1 TAKE A FEW MOMENTS TO TALK ABOUT OUR PREFERRED ALTERNATIVE  
2 THAT WE HAVE IN THE DRAFT DOCUMENT THAT I THINK MOST OF YOU  
3 PROBABLY HAVE SEEN BY NOW.

4 THE PREFERRED ALTERNATIVE ACTUALLY REPRESENTS A  
5 COMBINATION OF CURRENT USES THAT ARE GOING ON ON PUBLIC  
6 LANDS RIGHT NOW THAT REFLECT MULTIPLE USE ON PUBLIC LAND AND  
7 ADDS TO IT A FEW ADDITIONAL MEASURES THAT PROVIDE SOME  
8 ADDITIONAL PROTECTION TO THE ENVIRONMENT.

9 WHAT I'D LIKE TO DO IS JUST GIVE YOU A REAL  
10 QUICK SUMMARY ON SOME OF THESE MEASURES THAT WE'VE ADDED TO  
11 THE CURRENT MANAGEMENT IN THIS RESOURCE AREA.

12 WE'VE IDENTIFIED 14 AREAS OF CRITICAL  
13 ENVIRONMENTAL CONCERNS THAT ARE LISTED AS A.C.E.C.'S THAT DO  
14 ADD ADDITIONAL PROTECTION TO SOME CRITICAL RESOURCES THAT WE  
15 HAVE.

16 WE HAVE TAKEN ABOUT 56,000 ACRES PROPOSED AS  
17 CLOSED TO MINERAL ENTRY, MOST OF IT IS IN THE BOTTOMS OF  
18 RIPARIAN AREAS, TO PROTECT THE RIPARIAN ZONE AND OTHER  
19 CRITICAL ENVIRONMENTS.

20 WE'VE ALSO PROPOSED ABOUT 355,000 ACRES AS CLOSED  
21 TO MINERAL MATERIAL DISPOSAL. AT THE SAME TIME, TRYING TO  
22 ENSURE THAT THERE ARE MATERIAL SITES OF SAND AND GRAVEL  
23 PRIMARILY AVAILABLE TO THE COMMUNITIES AND THE NEEDS AROUND  
24 THE RESOURCE AREA; AND AT THE SAME TIME, TRYING TO PROTECT  
25 SOME OF THE CRITICAL HABITATS, ESPECIALLY SOME OF THE DESERT

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2

1 CAMPGROUNDS, BOTH PRIMITIVE AND MORE DEVELOPED WITH  
2 CONCESSIONS. WE'VE IDENTIFIED TRAIL HEADS AND SOME TRAILS  
3 FOR HIKING, BIKING, AND EQUESTRIAN USE.

4 WE HAVE INTERPRETIVE SITES WHERE WE HAVE SOME VERY  
5 NATURAL AND--I'M LOST FOR WORDS--NATURAL AND PROBABLY VERY  
6 RARE, I GUESS, FEATURES IN THIS COUNTY THAT COULD BE USED  
7 FOR INTERPRETIVE SITES AND FOR VISITORS TO VISIT.

8 WE HAVE THREE BACK COUNTRY BYWAYS, WHICH MOST OF  
9 YOU KNOW ABOUT ALREADY, AND WE HAVE ALSO IDENTIFIED SEVEN  
10 SPECIAL RECREATION MANAGEMENT AREAS; AND THESE ARE JUST  
11 AREAS THAT HAVE BEEN IDENTIFIED TO MANAGE FOR RECREATIONAL  
12 USES; AND IT ALSO EXHIBITS-- ALTERNATIVE TWO ACTUALLY  
13 ESTABLISHES THE KINGMAN REGIONAL PARK THAT WE'VE TALKED  
14 ABOUT BEFORE WHICH IS A JOINT VENTURE BETWEEN THE CITY, THE  
15 COUNTY, AND B.L.M. TO GET A REGIONAL PARK IN THE VICINITY OF  
16 GOLDEN VALLEY AND KINGMAN FOR THE USE BY CITIZENS IN THIS  
17 AREA.

18 THERE'S AN ADDITIONAL 84,000 ACRES IDENTIFIED AS  
19 SUITABLE FOR DISPOSALS THROUGH LAND EXCHANGES, RECREATIONAL  
20 AND PUBLIC PURPOSES FOR THE COMMUNITIES FOR SALE. THE  
21 DOCUMENT DOES STATE THAT THE PREFERRED METHOD IS EXCHANGE OF  
22 RECREATIONAL AND PUBLIC USE.

23 ONE OTHER ITEM I WANT TO MENTION IS THE--THE  
24 DOCUMENT DOES DESIGNATE OFF-HIGHWAY VEHICLE USE FOR THE  
25 WHOLE RESOURCE AREA, AND WE DESIGNATED THE WHOLE RESOURCE

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1 AREA AS EITHER OPEN, CLOSED OR LIMITED TO OFF-HIGHWAY  
 2 VEHICLE USE.  
 3 WE HAVE TWO AREAS IDENTIFIED AS COMPLETELY OPEN.  
 4 THAT MEANS CROSS COUNTRY USE AND THE WILDERNESS ACT DID  
 5 CLOSE ABOUT 350 ACRES TO ANY VEHICLE USE AND DID NOT  
 6 IDENTIFY ANYTHING IN ADDITION TO THIS AS CLOSED TO VEHICLE  
 7 USE.  
 8 THE REST OF THE RESOURCE AREA ABOUT 2.1 MILLION  
 9 ACRES, IS IDENTIFIED AS LIMITED AND THAT IS LIMITED TO  
 10 ROADS, TRAILS, EXISTING ROADS, TRAILS, WASHES, WHATEVER.  
 11 THERE ARE A FEW WASHES THAT WE DID SPECIFY AS  
 12 CLOSED AND THIS IS IN THE CRITICAL DESERT TORTOISE HABITAT  
 13 AREAS WHERE THE TORTOISES ARE USING THE WASHES, BUT OTHER  
 14 THAN THAT, IT'S COMPLETELY OPEN.  
 15 THIS IS A QUICK HIGHLIGHT. IT'S VERY, VERY QUICK  
 16 AND I DON'T WANT TO TAKE UP YOUR TIME, SO WITH THAT, IF  
 17 YOU'RE READY TO PROCEED.  
 18 MR. BRADY: THANK YOU VERY MUCH, ELAINE.  
 19 WE WOULD NOW LIKE TO PROCEED WITH THE PUBLIC  
 20 HEARING. AS I CALL YOUR NAME, I WOULD LIKE YOU TO COME TO  
 21 THE MICROPHONE SO THAT THE OFFICIAL REPORTER AND OTHER  
 22 MEMBERS OF THE AUDIENCE CAN HEAR YOU THIS EVENING.  
 23 PLEASE STATE YOUR NAME AND WE MAY ASK YOU TO SPELL  
 24 THE NAME FOR THE COURT REPORTER AND WHETHER OR NOT YOU ARE  
 25 REPRESENTING SOME GROUP.

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3

1 IN THE HEADLINES.  
 2 \*THESE MATTERS WERE BROUGHT OUT IN THE  
 3 CERBAT/BLACK MOUNTAIN AND HUALAPAI-AQUARIUS ENVIRONMENTAL  
 4 IMPACT STATEMENTS WRITTEN FOR THE PUBLIC LANDS IN THE  
 5 KINGMAN RESOURCE AREA IN THE LATE '70'S AND EARLY '80'S.  
 6 \*ADMITTEDLY, THERE WAS SOME BUMPY RANCH ROAD  
 7 TRAVERSED AT HIGH SPEED DURING THE DEVELOPMENT OF THESE TWO  
 8 DOCUMENTS, BUT SUBSEQUENT TO THEIR COMPLETION, THE ROAD  
 9 SEEMS TO HAVE SMOOTHED OUT AND A COOPERATIVE SPIRIT BETWEEN  
 10 RANCHER AND PUBLIC LAND MANAGERS HAS PREVAILED.  
 11 \*WE IN THE LIVESTOCK INDUSTRY, AS REPRESENTED BY  
 12 MEMBERS OF THE MOHAVE LIVESTOCK ASSOCIATION, WOULD LIKE TO  
 13 SEE THIS COOPERATION CONTINUE THROUGH THE 1990'S AND INTO  
 14 THE 21ST CENTURY.  
 15 \*ALTHOUGH THE TWO LIVESTOCK GRAZING E.I.S.  
 16 DOCUMENTS AND THE LIVESTOCK GRAZING PROGRAM DEVELOPED FROM  
 17 THEM HAVE BEEN INCORPORATED INTO THE NEW RESOURCE MANAGEMENT  
 18 PLAN BY REFERENCE, WE ARE CONCERNED THAT MANY ACTIONS  
 19 PROPOSED IN THE DRAFT R.M.P. WOULD ADVERSELY AFFECT  
 20 INDIVIDUAL GRAZING PERMITTEES AND PERHAPS CHANGE THE  
 21 COOPERATIVE SITUATION TO AN ADVERSARIAL ONE. WE WOULD LIKE  
 22 TO PREVENT THIS BY ADDRESSING OUR CONCERNS NOW AND HOPEFULLY  
 23 AFFECT THE OUTCOME OF THE FINAL R.M.P./E.I.S.  
 24 \*THIS STATEMENT--THIS ORAL STATEMENT WILL  
 25 SUMMARIZE SOME OF OUR CONCERNS. HOWEVER, DETAILED WRITTEN

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1 THE FIRST PERSON WHO'S INDICATED A DESIRE TO MAKE  
 2 A STATEMENT THIS EVENING IS MR. FRANK HUNT.  
 3 FRANK, COULD YOU COME TO THE MICROPHONE, PLEASE.  
 4 MR. HUNT: DO YOU WANT ME TO STAND AND  
 5 ADDRESS YOU?  
 6 MR. BRADY: YOU CAN FACE THE AUDIENCE.  
 7 THAT'S FINE. WHEREVER YOU FEEL COMFORTABLE.  
 8 MR. HUNT: I AM NOT COMFORTABLE.  
 9 MY NAME IS--EXCUSE ME. MY NAME IS FRANK HUNT.  
 10 I'M REPRESENTING THE MOHAVE LIVESTOCK ASSOCIATION. I HAVE A  
 11 LETTER I WOULD LIKE TO READ.  
 12 \*TO THE B.L.M.: WE APPRECIATE THE OPPORTUNITY TO  
 13 COMMENT AND GIVE INPUT INTO THIS RESOURCE MANAGEMENT PLAN.  
 14 LIVESTOCK GRAZING IS ONE OF THE MOST IMPORTANT AND, ALONG  
 15 WITH MINING, IS ONE OF THE EARLIEST COMMERCIAL USES OF THE  
 16 PUBLIC LAND.  
 17 \*INTERMINGLED LAND AND CONSULTATION AND  
 18 COOPERATION PER F.L.P.M.A. IS IMPORTANT TO THE LIVESTOCK  
 19 GRAZING TO PUBLIC LAND MANAGEMENT, IMPORTANT TO THE  
 20 LIVELIHOOD OF THE INDIVIDUAL RANCHER AND THE INDUSTRY  
 21 CONTRIBUTES SIGNIFICANTLY TO THE LOCAL ECONOMY.  
 22 \*THE GRAZING ANIMAL PERFORMS A VITAL FUNCTION IN  
 23 MAINTAINING A HEALTHY RANGELAND ENVIRONMENT. HEALTHY  
 24 RANGELANDS EQUAL HEALTHY WATERSHEDS AND THIS ISSUE CONCERNS  
 25 ALL OF US. LOCAL DECISIONS ON WATER ISSUES ARE CONTINUALLY

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1 COMMENTS WILL BE SUBMITTED PRIOR TO THE MARCH 8TH, 1991  
 2 DEADLINE.  
 3 \*OUR FIRST CONCERN IS THAT LIVESTOCK GRAZING WAS  
 4 NOT CONSIDERED AN ISSUE IN THE R.M.P. ALTHOUGH THIS IS  
 5 EXPLAINED ON PAGE 1, IT IS DIFFICULT TO UNDERSTAND SINCE  
 6 GRAZING IS REFERRED TO AND CURSED AND DISCUSSED THROUGHOUT  
 7 THE DOCUMENT.  
 8 \*BECAUSE IT WAS NOT CONSIDERED AN ISSUE, WE ASSUME  
 9 THIS WAS THE REASON THAT BETWEEN NOVEMBER 1988 THROUGH MARCH  
 10 1990 REPRESENTATIVES OF THE R.M.P. TEAM MET WITH 15  
 11 DIFFERENT INTEREST GROUPS BUT NOT THE MOHAVE LIVESTOCK, AND  
 12 THE MAILING OF THIS DRAFT WENT TO 57 INTEREST GROUPS PLUS  
 13 ALMOST 600 OTHERS BUT NOT THE MOHAVE LIVESTOCK ASSOCIATION.  
 14 \*IF IT IS DETERMINED THAT ALL PERMITTEES WERE NOT  
 15 SENT A COPY, THEN IT NEEDS TO BE INSERTED HERE. BELIEVE US,  
 16 WE ARE INTERESTED AND RESPECTIVELY REQUEST TO BE PUT ON THE  
 17 MAILING LIST. WE ALSO REQUEST A PERSONAL MEETING WITH THE  
 18 R.M.P. STAFF PRIOR TO MARCH 8TH SO WE CAN PRESENT AND  
 19 DISCUSS OUR WRITTEN COMMENTS.  
 20 \*THE SECOND CONCERN REGARDS THE GRAZING  
 21 PERMITTEES' RIGHT TO GRAZE THE PUBLIC LAND. ALTHOUGH THESE  
 22 RIGHTS ARE GIVEN BY LAW AND BY VESTED INTEREST IN WATER  
 23 RIGHTS, LIVESTOCK GRAZING IN THE DOCUMENT SEEMS BLURRED WHEN  
 24 COMPARED TO THE WIDE VARIETY OF PUBLIC LAND USES CONSIDERED.  
 25 \*PERHAPS THIS IS BECAUSE GRAZING WAS NOT

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1 CONSIDERED AN ISSUE, BUT IT DOES NOT ESCAPE THE FACT THAT  
 2 LIVESTOCK GRAZING IS THE MOST WIDESPREAD USE OF THE LAND AND  
 3 ALONG WITH MINING IS ONE WHICH HAS THE MOST VESTED INTEREST.  
 4 AS REPRESENTATIVES OF THE LIVESTOCK INDUSTRY IN MOHAVE  
 5 COUNTY, WE SIMPLY ASK THAT OUR VOICE BE HEARD.  
 6 "FURTHER CONCERNS REGARD TO THE EXCLUSIONARY TRENDS  
 7 IN THE DOCUMENT REGARDING AREAS OF CRITICAL ENVIRONMENTAL  
 8 CONCERN, RIPARIAN AREAS, AND SPECIAL STATUS SPECIES.  
 9 IT APPEARS THE WAY SOME OF THESE SECTIONS ARE  
 10 WORDED THAT LIVESTOCK GRAZING COULD BE ELIMINATED OR  
 11 SEVERELY RESTRICTED IN SUCH A MANNER THAT WOULD BE CONTRARY  
 12 TO THE APPROVED LIVESTOCK GRAZING PROGRAM DEVELOPED AS A  
 13 RESULT OF THE TWO E.I.S.'S. THESE CONCERNS WILL BE  
 14 DEVELOPED FURTHER IN OUR WRITTEN COMMENTS.  
 15 "AGAIN, WE APPRECIATE THIS OPPORTUNITY TO COMMENT  
 16 AND RESPECTIVELY REQUEST THAT OUR CONCERNS BE ADDRESSED AND  
 17 THAT THE FINAL DOCUMENT REFLECT THE CHANGES NECESSARY TO  
 18 ASSURE CONTINUED COOPERATION AND COORDINATION BETWEEN THE  
 19 BUREAU OF LAND MANAGEMENT AND THE LIVESTOCK INDUSTRY.  
 20 SPECIFIC WRITTEN COMMENTS WILL FOLLOW."  
 21 MR. BRADY: OKAY. THANK YOU VERY MUCH,  
 22 FRANK. APPRECIATE IT.  
 23 THE NEXT INDIVIDUAL THAT HAS INDICATED AN INTEREST  
 24 TO MAKE A STATEMENT IS ELNO ROUNDY.  
 25 IF YOU COULD SPELL YOUR NAME.

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1 THINK, BECAUSE WE CAN USE HISTORY TO ILLUSTRATE A POINT  
 2 USEFUL AS WE ATTEMPT TO MANAGE NATURAL RESOURCES ANYWHERE IN  
 3 THE WORLD.  
 4 "IT IS MY UNDERSTANDING THAT GREAT ANCIENT  
 5 CIVILIZATIONS WERE LOST IN THE MIDDLE EAST DUE TO A PROCESS  
 6 CALLED DESERTIFICATION. THE REASON FOR THIS, WE ARE JUST  
 7 BEGINNING TO UNDERSTAND, WAS A LACK OF UNDERSTANDING OF HOW  
 8 OUR ECOSYSTEMS OPERATE.  
 9 "EVEN AS SCIENCE HAS DEVELOPED THAT UNDERSTANDING,  
 10 WE HAVE BEEN UNABLE TO PUT THAT UNDERSTANDING TO USE IN MOST  
 11 OF OUR NATURAL RESOURCE PLANNING PROCEDURES. THE MISSING  
 12 ELEMENT IS THE FACT THAT NATURE OPERATES FROM A HOLISTIC  
 13 STANDPOINT.  
 14 "IT WOULD BE IMPOSSIBLE FOR ME TO EXPLAIN WHAT  
 15 THAT IS DUE TO LACK OF TIME AND BECAUSE I DO NOT TOTALLY  
 16 UNDERSTAND ALL OF THE RAMIFICATIONS MYSELF. HOWEVER,  
 17 SUFFICE IT TO SAY THAT ANY PROPERLY-FUNCTIONING ECOSYSTEM  
 18 OPERATES AS ONE UNIT COLLECTIVELY.  
 19 "THIS RESOURCE MANAGEMENT PLAN IS BEING DEVELOPED  
 20 TO MANAGE THE PUBLIC LAND WITHIN THE KINGMAN RESOURCE AREA  
 21 WHICH BOUNDARY LARGELY CONTAINS MOHAVE COUNTY SOUTH OF THE  
 22 COLORADO RIVER; THEREIN LIES THE INITIAL PROBLEM.  
 23 "IF THE ECOSYSTEM IS DESCRIBED WITH, LET'S SAY,  
 24 SOUTHERN MOHAVE COUNTY AS THE BOUNDARY, THEN PUBLIC LANDS  
 25 ARE ONLY ONE PART OF THAT ECOSYSTEM. ALREADY THE PLAN HAS

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1 HR. ROUNDY: E-L-N-O.  
 2 THE COURT REPORTER: AND WHAT'S YOUR LAST  
 3 NAME?  
 4 MR. ROUNDY: ROUNDY, R-O-U-N-D-Y. I'LL--I'LL  
 5 HAVE A COPY-- YOU CAN HAVE ONE WHEN I GET DONE HERE. I  
 6 USUALLY DON'T LIKE TO READ STUFF, BUT BEINGS IT'S KIND OF  
 7 INTO THE RECORD, THAT'S WHAT I'M GOING TO DO.  
 8 "AS I THOUGHT ABOUT THIS MEETING YESTERDAY, I  
 9 WASN'T REALLY SURE WHETHER I EVEN WANTED TO COME. MY  
 10 SPIRITS WERE DAMPENED BY THE BREAKOUT OF WAR IN THE MIDDLE  
 11 EAST AND I JUST DIDN'T FEEL THAT A PUBLIC MEETING WAS WHERE  
 12 I WANTED TO BE.  
 13 "THEN LAST NIGHT AS I WATCHED T.V., I VIEWED A MAP  
 14 OF IRAQ SHOWING THE HEART OF THAT COUNTRY TO BE A BIG VALLEY  
 15 WITH TWO LARGE RIVERS FLOWING THROUGH IT INTO THE PERSIAN  
 16 GULF.  
 17 "REVIEW OF MY GLOBE SHOWED THESE TO BE THE TIGRIS  
 18 AND EUHRATES RIVERS. AFTER READING THE MORNING PAPER, I  
 19 REALIZED IRAQ IS LOCATED IN THE AREA REFERRED TO AS THE  
 20 CRADLE OF CIVILIZATION.  
 21 "I GUESS I KNEW IN GENERAL THAT SOMEWHERE IN THE  
 22 MIDDLE EAST WAS THE ORIGINAL GARDEN OF EDEN, BUT I HAD NEVER  
 23 REALLY STUDIED THE GEOGRAPHY OF THE AREA.  
 24 "AND WHAT DOES THIS HAVE TO DO WITH A RESOURCE  
 25 MANAGEMENT PLAN MEETING IN KINGMAN, ARIZONA? A LOT, I

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1 FAILED FROM A HOLISTIC VIEWPOINT.  
 2 "YOU ALSO HAVE INTERMINGLED PRIVATE LAND, STATE  
 3 LAND, CITY LAND, OTHER FEDERAL LAND, AND ALL THE RESOURCE  
 4 USES ON THOSE LANDS. YOU HAVE WILDLIFE, DOMESTIC LIVESTOCK,  
 5 AND PEOPLE USING THE VARIOUS RESOURCES, THE  
 6 INTERRELATIONSHIP OF ALL NATURE'S BOUNTY FORMS THE ECOSYSTEM  
 7 WE LIVE IN.  
 8 "SO WHAT, YOU'RE PROBABLY THINKING AND I WOULDN'T  
 9 BLAME YOU. TO GET A LITTLE MORE SPECIFIC, LET'S TAKE THIS  
 10 PROPOSED MANAGEMENT PLAN. MUCH HARD WORK AND GOOD  
 11 INFORMATION HAS GONE INTO THIS DOCUMENT DEVELOPED BY A LOT  
 12 OF GOOD PEOPLE.  
 13 "HOWEVER, EACH RESOURCE IS LARGELY GUIDED BY ITS  
 14 OWN AGENDA, AND THIS IS GOING TO MAKE IT EXTREMELY DIFFICULT  
 15 FOR MANAGEMENT PERSONNEL TO SORT OUT WHAT THE BEST MIX OF  
 16 LAND USE WILL BE.  
 17 "WILDLIFE PROPONENTS HAVE THEIR WANTS, LIVESTOCK  
 18 PROPONENTS HAVE THEIR WANTS, MINING PROPONENTS HAVE THEIR  
 19 WANTS. WILD HORSE AND BURRO PROPONENTS HAVE THEIR WANTS,  
 20 WOODCUTTERS HAVE THEIR WANTS, AND WATER USERS HAVE THEIR  
 21 WANTS. EVERYONE HAS WANTS AND WHAT A DIFFICULT JOB IT WILL  
 22 BE TO SORT THESE OUT AND COME UP WITH A PLAN THAT EVERYBODY  
 23 WANTS; NO DOUBT IMPOSSIBLE.  
 24 "THIS DIFFICULTY COULD BE AVOIDED IF THE ECOSYSTEM  
 25 INVOLVED WAS MANAGED HOLISTICALLY WHERE ALL RESOURCE

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1 COMPONENTS AND USES ARE INTERTWINED TO OPERATE AS ONE  
 2 FUNCTIONING UNIT, THE WAY NATURE INTENDED BEFORE MAN MUCKED  
 3 IT UP.  
 4 "THERE IS A WAY TO GET OUT OF THIS MESS WE'VE GOT  
 5 OURSELVES INTO WITH THIS OCCUMENT. I SAY MESS, NOT IN A  
 6 DEROGATORY SENSE, BUT IN A FACTUAL SENSE. THE FAULT LIES,  
 7 NOT IN THE PEOPLE INVOLVED IN DEVELOPING THE R.M.P. OR  
 8 DETAILED INFORMATION WITHIN IT, BUT RATHER IN THE PROCESS  
 9 ITSELF.  
 10 "IN MY WRITTEN COMMENTS, WHICH WILL BE SUBMITTED  
 11 BEFORE MARCH 8TH, 1991, I WILL BE SUGGESTING A PROCESS THAT  
 12 WOULD MAKE THE FINAL OUTPUT OF THIS PLANNING OCCUMENT  
 13 HOLISTIC IN NATURE AND THEREBY SATISFYING THE WANTS OF ALL  
 14 OF US WHO LIVE WITHIN THE CONFINES OF THIS ECOSYSTEM WE CALL  
 15 MOHAVE COUNTY."  
 16 THANK YOU.  
 17 MR. BRADY: THANK YOU VERY MUCH, ELNO.  
 18 THE NEXT PERSON WHO'S INDICATED AN INTEREST TO  
 19 MAKE A STATEMENT IS MR. ROBERT HARRISON.  
 20 MR. HARRISON: THANK YOU FOR THE OPPORTUNITY  
 21 TO ADDRESS YOUR HEARING. MY NAME IS ROBERT HARRISON. I  
 22 DON'T HAVE A FORMAL LETTER FOR YOU AT THIS TIME. I WILL  
 23 HAVE ONE BEFORE THE DEADLINE.  
 24 AS A NUMBER OF YOU KNOW, I WAS THE B.L.M.  
 25 GEOLOGIST FOR THE KINGMAN RESOURCE AREA FOR FOUR YEARS. I

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1 THE SUPPORT OF THE DEVELOPMENT OF THE MINERAL  
 2 RESOURCES ON PUBLIC LANDS IS FURTHER ENCOURAGED BY THE  
 3 B.L.M.'S MULTIPLE RESOURCE USE CONCEPT AND THE B.L.M.  
 4 MINERAL RESOURCE POLICY OF MAY 29, 1984.  
 5 THESE STATEMENTS ARE DIRECTLY FROM THE R.M.P.  
 6 THEY ARE STRAIGHTFORWARD DEFINITIONS OF POLICY COMPATIBLE  
 7 WITH THE NEEDS OF THE MINERALS INDUSTRY, LOCAL, STATE, AND  
 8 NATIONAL REQUIREMENTS AND ALLOW FOR THE PROTECTION OF ALL  
 9 OTHER RESOURCES UNDER THE EXISTING UMBRELLA OF THE NATIONAL  
 10 ENVIRONMENTAL PROTECTION ACT.  
 11 RATHER THAN COMPLYING WITH EXISTING FEDERAL LAWS  
 12 AND POLICIES AND B.L.M. POLICY STATEMENTS, K.R.A. HAS CHOSEN  
 13 TO REMOVE LANDS FROM MINERAL ENTRY BY DEFACTO WITHDRAWALS  
 14 UNDER THE GUISE OF PROTECTING THE SPECIES OR POTENTIAL  
 15 SPECIES THAT MAY NOT BE IN DANGER; IN FACT, ARE NOT ON ANY  
 16 STATE THREATENED OR ENDANGERED LIST. EXCUSE ME A MOMENT.  
 17 THE PRIMARY SPECIES INVOLVED IS BIG HORN SHEEP.  
 18 BIG HORN SHEEP IS A VERY BEAUTIFUL SPECIES, BUT, IN FACT, IT  
 19 IS NOT ON AN ENDANGERED LIST, ANY ENDANGERED LIST.  
 20 THE GAME AND FISH ANNUALLY HOLD HUNTS FOR BIG HORN  
 21 SHEEP, AND IN APPENDIXES 18, PAGE 203 OF THE R.M.P, IT IS  
 22 STATED THAT "THE BIG HORN SHEEP IS EXTREMELY VALUABLE  
 23 ECONOMICALLY AS WELL AS PROVIDING REVENUE TO MOHAVE COUNTY.  
 24 HUNTERS ANNUALLY CONTRIBUTE OVER A HUNDRED AND TWENTY-FIVE  
 25 THOUSAND DOLLARS FOR ONE AUCTION AND ONE RAFFLED HUNT

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1 ASSISTED IN THE INITIAL PREPARATION OF THIS DOCUMENT. I  
 2 HAVE SINCE LEFT THE BUREAU AND I AM A PRIVATE CONSULTANT.  
 3 AFTER READING THE DOCUMENT, I FELT THAT THERE WAS  
 4 A NUMBER OF MAJOR PROBLEMS. THE FIRST MAJOR PROBLEM THAT I  
 5 SAW WAS THERE WERE TOO MANY PERSONAL AGENDAS, PERSONAL  
 6 AGENDAS THAT SIGNIFICANTLY DESTROY THE EFFECTIVENESS OF THE  
 7 FEDERAL LAWS, POLICIES, B.L.M. POLICIES AND PRETTY MUCH--  
 8 OH, I LOST MY LINE HERE. THE POLICIES IN POINT ARE  
 9 PRIMARILY THE A.C.E.C.'S.  
 10 I'D LIKE TO READ A COUPLE OF LINES OUT OF THE  
 11 E.I.S., THE DRAFTED E.I.S. "THE MINING MINERAL"-- LET'S  
 12 SEE. EXCUSE ME. "THE MINERALS INDUSTRY HAS HAD A LONG AND  
 13 PROFITABLE RELATIONSHIP WITH THE COMMUNITIES AND CITIZENS OF  
 14 THESE PORTIONS OF MOHAVE, YAVAPAI, AND COCONINO COUNTIES  
 15 WITH K.R.--WITHIN THE K.R.A. BOUNDRIES. MOUNTAIN RANGES AND  
 16 INTERVENING VALLEYS THROUGHOUT THE AREA CONTAIN A WEALTH OF  
 17 MINERALS," AND IT GOES ON TO SAY, "THE MINING AND MINERALS  
 18 POLICY ACT OF 197D, F.L.P.M.A., RESEARCH AND DEVELOPMENT ACT  
 19 OF 1980, NATIONAL MINERALS AND MINERALS POLICY ACT--EXCUSE  
 20 ME--NATIONAL MATERIALS AND POLICY ACT ALL DIRECT B.L.M. TO  
 21 ACTIVELY ENCOURAGE AND FACILITATE THE DEVELOPMENT OF OUR  
 22 PUBLIC LAND MINERAL RESOURCES BY PRIVATE INDUSTRY TO SATISFY  
 23 LOCAL/NATIONAL NEEDS AND TO PROVIDE ECONOMICALLY AND  
 24 ENVIRONMENTALLY SOUND EXPIRATION, EXTRACTION, AND  
 25 RECLAMATION." IT SAYS MUCH MORE BEYOND THIS.

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1 ALONE."  
 2 A HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS FOR ONE  
 3 HUNT ALONE. THAT'S A LOT OF MONEY. BUT WHERE DOES THAT  
 4 MONEY ACTUALLY GO? DOES THAT MONEY COME TO THE COUNTY? NO.  
 5 I KNEW IT DIDN'T, BUT JUST TO MAKE SURE, I CALLED  
 6 THE ARIZONA GAME AND FISH FINANCIAL DEPARTMENT YESTERDAY AND  
 7 THAT GOES DIRECTLY TO THEIR COFFERS. IT DOES NOT COME TO  
 8 THE COUNTY. THE-- IF, IN FACT, THIS MONEY GOES TO GAME AND  
 9 FISH, HOW DOES THIS SPECIES BENEFIT THE COUNTY?  
 10 IT IS NICE AND I WOULD NOT REMOVE THAT BIG HORN  
 11 SHEEP FROM THIS COUNTY UNDER NO MEANS. THE A.C.E.C.'S, AS  
 12 DESIGNED WITHIN THIS R.M.P., REMOVE APPROXIMATELY 308,216  
 13 ACRES FROM EFFECTIVE MINERAL ENTRY, NOT ENTIRELY, BUT FROM  
 14 EFFECTIVE MINERAL ENTRY.  
 15 THEY HAVE NUMEROUS DEFACTO WITHDRAWALS. OCCUPANCY  
 16 OF THE LAND WITHIN THESE AREAS, IN CERTAIN AREAS, FROM  
 17 DECEMBER 1 TO MAY 31. THAT MEANS YOU CAN OPERATE THE MINE  
 18 FOR THREE--SIX MONTHS OF THE YEAR. SOME OF THE LANDS, 30  
 19 SOME ODD THOUSAND ACRES, WHICH I DON'T HAVE HERE IN FRONT OF  
 20 ME, NO SURFACE OCCUPANCY. YOU CAN'T MINE IF YOU CAN'T GET  
 21 ON THE GROUND AND MANY OTHER CONSTRAINTS.  
 22 WE'VE HEARD HOW MUCH VALUE, A HUNDRED AND  
 23 TWENTY-FIVE THOUSAND DOLLARS, ANNUALLY FOR ONE HUNT. THAT'S  
 24 HOW MUCH VALUE A SHEEP IS WORTH--HOW MUCH A SHEEP IS WORTH.  
 25 CYPRESS/BAGOAD, THAT'S A VERY LARGE MINE. THERE'S

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1 NOT THAT MANY MINES AROUND THAT ARE THAT LARGE, BUT WE DO  
 2 HAVE ONE THAT SIZE. TAVAPAI COUNTY, ANNUALLY, THE TOTAL TAX  
 3 REVENUE IS APPROXIMATELY \$10 MILLION. SIXTY PERCENT COMES  
 4 BACK TO THE COUNTY. THE MINE LIFE VALUE TAX MONEY FOR THAT  
 5 PARTICULAR MINE IS APPROXIMATELY \$300 MILLION. THAT'S A LOT  
 6 OF BIG HORN SHEEP.  
 7 THE A.C.E.C.'S, AS DESIGNED IN THIS R.M.P.,  
 8 BASICALLY REMOVE ALL OF THE MAJOR MINERAL POTENTIAL AREAS IN  
 9 MOHAVE COUNTY FOR MINERAL ENTRY. THAT IS A TERRIBLE  
 10 INJUSTICE TO THE MINERAL'S INDUSTRY. THAT IS AN ABUSE OF  
 11 THE A.C.E.C. PROVISIONS.  
 12 THANK YOU.  
 13 MR. BRADY: THANK YOU VERY MUCH, BOB.  
 14 I DID NOT SEE ANY OTHER INDIVIDUALS THAT HAD  
 15 INDICATED AN INTEREST TO MAKE A STATEMENT ON THE SIGN-IN  
 16 SHEET.  
 17 ARE THERE ANY OTHERS IN THE AUDIENCE THAT WOULD  
 18 LIKE TO MAKE A STATEMENT THIS EVENING?  
 19 (AN AUDIENCE MEMBER RAISES HIS HAND.)  
 20 MR. BRADY: YES, SIR.  
 21 IF YOU COULD PLEASE STATE YOUR NAME AND IF YOU ARE  
 22 ASSOCIATED WITH SOMEONE.  
 23 MR. GROSS: MY NAME IS MIKE GROSS. I'M A  
 24 RANCHER OUT IN THE GOLDEN VALLEY/SACRAMENTO VALLEY. I COME  
 25 UP HERE TO MAINLY TALK ABOUT LAND DISPOSALS AND HOW I'M

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1 WE ARE ALL TRYING TO IMPROVE THE LIFE STYLE OUT  
 2 THERE. WE'VE BEEN INVOLVED WITH B.L.M. THEY PUT A LOT OF  
 3 TIME IN THIS, TOO; AND I HATE TO SEE THIS LAND DISPOSAL GO  
 4 THROUGH. THEN--THEN WE HAVEN'T REALLY--REALLY JUST BARELY  
 5 GET INTO THIS. NOW WE'RE SHOWING SOME SIGNS OF VARIOUS  
 6 PLANT--DIFFERENT KIND OF PLANT SPECIES.  
 7 VERY-- WE'RE ALSO FINDING OUT THAT WE'VE HAD VERY  
 8 LITTLE EROSION AND WE'RE FINDING OUT WE CAN RUN A LOT OF  
 9 CATTLE IN A LITTLE AREA THAT WE HAD FIGURED MANY, MANY YEARS  
 10 AGO WE COULDN'T NEVER DO THIS; AND I HATE TO SEE THIS GO  
 11 OVER TO ANOTHER PRIVATE OR A STATE BECAUSE B.L.M. HAS REALLY  
 12 WORKED CLOSE WITH US.  
 13 I HAVE A VERY GOOD RELATIONSHIP WITH THE B.L.M.  
 14 OFFICE AND I WANT TO CONTINUE THIS. THEY PUT A LOT OF TIME  
 15 AND A LOT OF MONEY INTO THE RANCH IMPROVEMENT OUT THERE  
 16 ALONG WITH MY--MY FAMILY, SO I'M DEFINITELY AGAINST THIS  
 17 DISPOSAL, THIS LAND DISPOSAL.  
 18 IT'S ALSO GOING TO AFFECT THE MINERAL PARK  
 19 ALLOTMENT, WHICH I'M RIGHT UP AGAINST THE CYPRESS/BAGDAD  
 20 MINE OUT THERE; AND I WANT TO BRING UP ONE OTHER THING ABOUT  
 21 THE WILD HORSE.  
 22 I THINK THE NUMBERS FOR MANAGING MY HORSES OUT  
 23 THERE ARE A LITTLE HIGH, AND BACK IN 1971, THERE WAS A--  
 24 WHEN THE ACT WENT IN, THE NUMBER WAS SUPPOSED TO HAVE BEEN  
 25 14 HEAD AND, ALL OF A SUDDEN, THEY WANTA JUMP UP TO 90 HEAD.

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1 REALLY GOING TO BE AFFECTED BY LAND DISPOSALS.  
 2 ALL ALONG IT SEEMED LIKE THE DEVELOPMENTS JUST  
 3 KEEPS PUSHING, PUSHING, AND PUSHING; AND IN MY OPINION IS  
 4 WHAT IS HAPPENING IS I THINK A LOT OF REAL ESTATERS, LAND  
 5 DEVELOPERS ARE TRYING TO GET GREEDY REAL FAST.  
 6 THERE'S A LOT OF LAND LAYING OUT THERE IN THAT  
 7 GOLDEN VALLEY THAT HASN'T NEVER BEEN DEVELOPED YET. THEY  
 8 SEEM LIKE THEY WANTA KEEP ON PUSHING AND PUSHING AND PUSHING  
 9 TO GRAB UP MORE AND MORE AND MORE LAND, AND IT'S A VERY BIG  
 10 CONCERN TO ME BECAUSE WHAT'S IS IN THIS R.P.M. IF IT GOES TO  
 11 ALTERNATE TWO OR THREE, I'M REALLY GOING TO BE PROBABLY PUT  
 12 OUT OF THE CATTLE BUSINESS.  
 13 NOW, ELNO MENTIONED SOMETHING ABOUT HOLISTIC. MY  
 14 FAMILY ABOUT FOUR YEARS AGO PUT IN A HOLISTIC RESOURCE  
 15 MANAGEMENT OUT THERE. WE ARE THE FIRST RANCHER IN MOHAVE  
 16 COUNTY TO DO THIS.  
 17 I'VE--MY FAMILY HAS--IN THE LAST FIVE YEARS HAS  
 18 REALLY PUT A LOT OF TIME IN LAND MANAGEMENT WITH OUR CATTLE.  
 19 WE DON'T INTEND TO RAPE THE LAND.  
 20 WE ALSO WANT TO IMPROVE THE LAND FOR MANY REASDNS.  
 21 ONE THING IS WATERSHED. IT'S VERY IMPORTANT IN THIS DESERT.  
 22 IT'S A VERY BIG BACKFIRE OUT THERE, BUT THAT BACKFIRE DIDN'T  
 23 GET GOIN' JUST BY DEVELOPING LAND. IT-- YOU KNOW, IT  
 24 HAPPENED BY NATURE, HOLISTIC, AND WE ARE TRYING TO IMPROVE  
 25 PLANT SPECIES.

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1 THAT SEEMS AWFUL HIGH IN JUST A SHORT PERIOD OF  
 2 TIME OF WHAT THEY WANT TO MANAGE. THESE HORSES ARE REALLY  
 3 GOING TO BE INVOLVED WITH THE DEER POPULATION. THE CERBATS  
 4 DOES GOT A FINE DEER POPULATION; AND IF THAT HAPPENS, I  
 5 THINK IT'S GOING TO BE IN COMPETITION WITH--WITH THE DEER  
 6 POPULATION AND ALSO WITH--WITH MY--MY ALLOTMENT AND OTHER  
 7 ALLOTMENTS IN THE CERBAT.  
 8 I THINK THERE'S GOT TO BE A BUFFER ZONE TO THESE  
 9 HORSES AND TO THE BIG HORN SHEEP IN THE BLACK MOUNTAINS, SO  
 10 I THINK WE'RE REALLY SERIOUSLY GOT TO BE THINKING ABOUT THIS  
 11 LAND DISPOSAL SITUATION 'CAUSE THERE'S GOT TO BE A BUFFER  
 12 ZONE AND ALSO THERE'S GOT TO BE LAND FOR PEOPLE TO HUNT, TO  
 13 BUILD AND, YOU KNOW, TO DO OTHER--OTHER THINGS BESIDES JUST  
 14 CHOP IT UP IN DEVELOPMENT.  
 15 THANK YOU.  
 16 MR. BRADY: THANK YOU VERY MUCH, MIKE.  
 17 IS THERE ANY OTHER INDIVIDUAL THAT WOULD LIKE TO  
 18 MAKE A FORMAL STATEMENT THIS EVENING?  
 19 (NO RESPONSE.)  
 20 MR. BRADY: THERE BEING NO OTHER PEOPLE  
 21 WISHING TO TESTIFY THIS EVENING, I HEARBY CLOSE THE HEARING.  
 22 ANYONE WISHING TO ASK QUESTIONS OF THE B.L.M.  
 23 PEOPLE THAT ARE HERE THIS EVENING ARE WELCOME TO DO SO AFTER  
 24 THE HEARING.  
 25 AGAIN, I THANK YOU FOR SHOWING UP THIS EVENING AND

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1 YOUR ATTENDANCE IS DEEPLY APPRECIATED.  
 2 THANK YOU.  
 3 (THE TAKING OF THE HEARING WAS CONCLUDED AT  
 4 7:50 P.M.)  
 5  
 6  
 7  
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1 CERTIFICATE OF REPORTER  
 2 STATE OF ARIZONA )  
 3 ) SS.  
 4 COUNTY OF MOHAVE)  
 5  
 6 I, JANICE MINER, COURT REPORTER, DO HEREBY CERTIFY  
 7 THAT I TOOK DOWN IN SHORTHAND (STENOTYPE) ALL OF THE  
 8 PROCEEDINGS HAD IN THE BEFORE-ENTITLED MATTER AT THE TIME  
 9 AND PLACE INDICATED, AND THAT THEREAFTER SAID SHORTHAND  
 10 NOTES WERE TRANSCRIBED INTO TYPEWRITING AT AND UNDER MY  
 11 DIRECTION AND SUPERVISION AND THE FOREGOING TRANSCRIPT  
 12 CONSTITUTES A FULL, TRUE AND ACCURATE RECORD OF THE  
 13 PROCEEDINGS HAD.  
 14 IN WITNESS WHEREOF, I HAVE HEREUNTO AFFIXED MY  
 15 HAND THIS 31ST DAY OF JANUARY, 1991.  
 16  
 17   
 18 JANICE MINER NEE BROWER, COURT REPORTER  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 also like to have enough time afterwards for, like  
 2 I said, anyone having questions or answers that  
 3 they wish on any part of the document, have that  
 4 time available for you also. It's nice to see this  
 5 kind of turnout, and I hope we can have a  
 6 productive evening.

7 I'd just like to give you a little bit  
 8 of information on the plan. I have a map here to  
 9 my left which is in the back of your document. If  
 10 any of you did not receive a document and you'd  
 11 like to have one, I think we only have two left.  
 12 We brought a whole box of them and people have been  
 13 picking them up as they have been walking in, but  
 14 there are a couple left. If you would like one,  
 15 please give us your name and address. We'd be more  
 16 than happy to mail you one tomorrow, but this map  
 17 is in the back of the plan, and we have an overlay,  
 18 an onion paper overlay to show some of the more  
 19 significant areas that we are addressing in the  
 20 plan.

21 I will give you just a quick synopsis of  
 22 the color coding that we have here.

23 The blue -- dark blue areas, solid blue  
 24 areas are the city centers. Kingman in the center  
 25 and Bullhead City and Lake Havasu City. This map

SOUTHWEST REPORTING

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1 management as we are doing it right now. It  
 2 incorporates all the old plans, what we are  
 3 operating under.

4 Alternative number two we have  
 5 designated as our preferred alternative. It  
 6 includes just about all the same prescriptions that  
 7 we are currently doing; however, we have added or  
 8 modified some of the prescriptions. We have  
 9 increased some of the areas for land disposal.  
 10 We've provided some areas for additional  
 11 protection. The areas of critical -- excuse me --  
 12 environmental concern are some of those  
 13 prescriptions.

14 And the third alternative more or less  
 15 reflects some changes or some alternatives, I  
 16 guess, to our preferred alternative. Some of these  
 17 areas are either greater or some of the  
 18 prescriptions are less in acreage, so there are  
 19 some differences.

20 With that -- I think I will just leave  
 21 it at that. I don't want to take up all of your  
 22 time. What I'd like to do is call you up in the  
 23 order that you signed in to speak. I do have a  
 24 list and I would like you to come to the  
 25 microphone, and I know that's not particularly what

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1 represents more or less the Kingman Resource Area  
 2 planning area, so that's the boundary that you're  
 3 more or less seeing on this map.

4 The blue-checked areas are areas that  
 5 we have identified as suitable for disposal of  
 6 federal lands to go into private ownership.

7 And the dark green areas are those  
 8 wilderness areas that have been designated in the  
 9 last -- in the Wilderness Bill that was signed by  
 10 the President on November 28, so we have nine  
 11 wilderness areas in our resource area that are now  
 12 designated as wilderness. Those are final.

13 The green slash mark areas are areas  
 14 that we have identified in our plan as containing  
 15 some sensitive resources or habitat areas or  
 16 features that need some kind of special management  
 17 above and beyond the normal management of the  
 18 Bureau of Land Management. Those are identified in  
 19 the document. We have 14 of them, and we actually  
 20 outlined specifically what type of management  
 21 prescriptions we would be proposing for those  
 22 areas. I think that more or less covers what's on  
 23 the overlay.

24 There are three alternatives in the  
 25 plan. The first alternative reflects current

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1 you might want to do, but it's important that the  
 2 court reporter gets your name, so if you could  
 3 state your name and what you do or what you're  
 4 representing so that she has an idea of -- can  
 5 record, you know, what position or from where  
 6 you're coming from and then just -- we'll limit you  
 7 to about five minutes so that we have enough time  
 8 to get everybody to speak. Most people don't  
 9 usually take five minutes, but if you need it, you  
 10 will have it, okay?

11 Okay. First speaker I'd like to call up  
 12 is John -- is it Pettit?

13 MR. PETTIT: Pettit.

14 MS. MARQUIS: Pettit.

15 MR. PETTIT: First of all, my name is  
 16 John Pettit. I'd like to state that I'm  
 17 representing myself as a Bagdad citizen, an avid  
 18 outdoorsman, and also as an employee of Cyprus  
 19 Bagdad.

20 I'm thoroughly appalled at the  
 21 underhanded attempts of BLM to hamper current and  
 22 long-term operation of the Bagdad copper mine. It  
 23 frustrates me to witness the political ploys that  
 24 have become such an essential part of our  
 25 democratic bargaining process. Was it not enough

SOUTHWEST REPORTING

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1 that Congress by way of our citizens voted as they  
 2 did on the Arizona Wilderness Bills Number 2570 and  
 3 10807. In my opinion, the people have decided.  
 4 I have always been under the impression  
 5 that the Bureau of Land Management's mission was to  
 6 promote multiple-use land management. It is my  
 7 opinion that the BLM is being awayed by special  
 8 interest groups. These special interest groups are  
 9 striking at the very heart of Arizona's highly  
 10 mineralized mining sectors. Media coverage and the  
 11 well-planned strategies of wilderness activists are  
 12 effectively turning the tide and shifting the  
 13 advantage to the side of preservation. It is  
 14 special interest groups who are surely behind these  
 15 management proposals, are successfully converting  
 16 high-potential, highly mineralized lands into areas  
 17 of critical environmental concern, desert tortoise  
 18 areas, or wild and scenic designated areas. The  
 19 mining industry, specifically Bagdad, would be  
 20 forced to compete in world markets while incurring  
 21 greatly increased production costs or worst yet,  
 22 forced out of business entirely.  
 23 What this entire issue really boils down  
 24 to are two separate factions attempting to  
 25 prioritize economy and ecology. True resolution

SOUTHWEST REPORTING

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1 and abide by very strict environmental codes and  
 2 federal regulations. Compliance with these  
 3 regulations coupled by efficient multiple land use  
 4 management on the BLM's part is, in my opinion,  
 5 sufficient to guarantee absolute minimal disruption  
 6 of the surrounding ecology. I strongly urge the  
 7 BLM to remove from consideration the various  
 8 proposed designations located within the Upper and  
 9 Lower Burro Creek areas. Thank you.  
 10 MS. MARQUIS: Thank you, John.  
 11 Jerry Brimhall.  
 12 MR. BRIMHALL: My name is Jerry  
 13 Brimhall. I'm representing the Upper Burro Creek  
 14 cattle allotment. We have a ranch in Upper Burro  
 15 Creek. Also a school teacher. And I am also an  
 16 environmentalist.  
 17 I'd like to state at this time that over  
 18 the last ten years, we have enjoyed an improved --  
 19 improving relationship with the BLM. As we  
 20 started, there was many disagreements. There was  
 21 many kinds of negotiations that had to be gone  
 22 through to arrive at our present position with the  
 23 BLM, but at this moment, period in time, we do have  
 24 a good relationship with the BLM and we do have --  
 25 and I thank them for that. I think they have a

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1 can only be achieved through balance. It is  
 2 ludicrous to think that a government agency would  
 3 attempt to place such a big restriction on a  
 4 well-established, profitable, and significant  
 5 tax-contributing company and community. This is  
 6 actually a much bigger issue than one of ecology.  
 7 We must continue to maintain our country's economic  
 8 superiority if we are to continue to provide a  
 9 balance of world peace. Granted, we are one cooper  
 10 producer among many, but we must set a precedent.  
 11 Though preservation is needed and appropriate in  
 12 some circumstances, multiple land use, properly  
 13 administered, can provide the balance needed to  
 14 succeed and to survive.  
 15 My thoughts are summed up by a quote  
 16 from Aldo Leopold, a pioneer in the preservation  
 17 movement. This particular quote comes from his  
 18 writings titled "The Sand County Almanac," and the  
 19 quote goes as follows:  
 20 "The hulk of all land relations hinges  
 21 on investments of time, forethought, skill, and  
 22 faith, rather than on the investment of cash." As  
 23 a land thinker -- "As a land user thinketh, so is  
 24 he."  
 25 Here at Cyprus Bagdad, we are governed

SOUTHWEST REPORTING

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1 sincere -- they have put forth as much effort as we  
 2 have to try to get along and cooperate and I think  
 3 this shows that through cooperation you can  
 4 accomplish more than through fighting and for  
 5 disagreeing and all kinds of disruptions of any  
 6 managerial program.  
 7 In response to the Kingman Area Resource  
 8 Management Plan and Environmental Impact Statement,  
 9 I would like to submit the following comments:  
 10 I recommend the proposal alternative one  
 11 with the exclusion of the ACEC plan stated in  
 12 Table II-2 on page 35 of the document. The present  
 13 management is doing an adequate job and leaves  
 14 present tax-based land in the use of local  
 15 citizens. The selection of alternatives to be  
 16 pursued must take into consideration the following  
 17 three criteria. These are three criteria that I  
 18 would suggest that be looked at in developing and  
 19 selecting any criteria.  
 20 First, the criteria selected must hold  
 21 each party involved in the managerial system  
 22 personally responsible for his or her decisions.  
 23 Those with the most to lose are going to be more  
 24 responsible. In a bureaucratic environment, it's  
 25 difficult to hold anybody responsible for the

SOUTHWEST REPORTING

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1 consequences.

2       Number two, the plan selected must

3 manage the area in a holistic unit -- or as a

4 holistic unit. One species cannot be protected to

5 the detriment of others. We have seen this in many

6 areas.

7       Number three, the alternative also needs

8 to be supported by the local citizens. They're the

9 ones whose livelihoods will be threatened. No

10 program will be successful without their support.

11       Alternatives two and three will

12 basically eliminate the cattle and mining industry

13 which are basic sources of lifestyle and income in

14 this area. In comparing -- in comparing the

15 present Burro Creek area management with other

16 which uses multi-use, comparing this with the

17 Arivaipa and San Pedro areas, which do not use

18 multi-use, there is a significant comparison that

19 all three areas are being improved and being

20 developed in the many, many different ways and they

21 are all successful.

22       So this proves to me that multi-use can

23 be successful. It can be used as a management plan

24 to fulfill the requirements and the development in

25 any area. Any change in management will cause more

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1 fluid retention aids, organoclad clays, and

2 thickeners.

3       We hold 720 acres of State mineral

4 leases in East Burro Creek and 1680 acres of mining

5 claims on federal land in West Burro Creek. This

6 is a saponite deposit, a very peculiar clay

7 deposit.

8       About 740 acres at the West Burro Creek

9 deposit were excluded from the Lower Burro Creek

10 WSA. In fact, the boundary was redrawn to exclude

11 the area being explored and mined. Both the Upper

12 Sonoran Pinal Wilderness Impact Statement and the

13 Mineral Resources of the Lower Burro Creek

14 Wilderness Study Area Mineral Land Assessment Open

15 File Report -- long words -- recognized that the

16 saponite deposit contains an inferred resource of

17 approximately 577,000 tons and has a greatest

18 commercial potential of a mineral deposit in the

19 area.

20       Since 1983, eight years ago, we and our

21 venture partners have drilled over 100 exploration

22 holes to define the extent and purity of the

23 deposit. In addition, we have done extensive --

24 and I might add expensive -- analytical work,

25 research and development. The plant runs new

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1 problems than it will benefit. For this reason, I

2 support alternative one without the ACEC plan.

3 Thank you.

4       MS. MARQUIS: Thank you, Jerry.

5       James Patterson.

6       MR. PATTERSON: Just about what John

7 Pettit said just covers it all, as far as I'm

8 concerned.

9       MS. MARQUIS: Okay. Thank you, James.

10       John, did you know you were speaking for

11 multiple people?

12       Ted, you're going to have to help me.

13 Is that Eyde?

14       MR. EYDE: My name is Ted Eyde. And for

15 the benefit of our court recorder, it's a

16 four-letter word, E-y-d-e. I reside at 1235 East

17 Moon Ridge Road in Tucson. My statement is made

18 for myself and the Southwestern Minerals

19 Exploration Association, a group of professional

20 geologists and engineers engaged in mineral

21 exploration in Arizona. My background includes 35

22 years of professional experience in the exploration

23 and production of industrial minerals. Currently,

24 I'm president of USA Resources, a family-owned

25 company which producee clays used in dessicants,

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1 product development. Over \$500,000 or half a

2 million dollars has been spent on the project to

3 date.

4       We ship saponite from Burro Creek to

5 Bentec, Incorporated; Technical Minerals,

6 Incorporated; the R. T. Vanderbilt Company

7 Incorporated; English China Clays. Saponite is

8 used as a viscosifier and thickener for water-based

9 paints and coatings, which is a rapidly growing

10 market because of the EPA-mandated reduction in use

11 of salt and paints. It is used as organoclad

12 clays to recover and stabilize hazardous toxic

13 organic compounds such as PCBs. The most important

14 use, however, is in its application as a fluid

15 retention aide in the processing of recycled fine

16 paper products like this.

17       The Burro Creek saponite appears to be

18 one of the largest deposits in the world of

19 high-brightness, high-viscosity saponite. The

20 other deposits are in Turkey and the United

21 Republic of Tanzania in East Africa. And I would

22 say that neither of these deposits is in a

23 particularly politically stable area at this

24 moment.

25       The Lower Burro Creek wilderness area

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1 was released for return to multiple use by the  
2 United States Congress; nevertheless, about half of  
3 the West Burro Creek deposit and, of course, the  
4 East Burro Creek deposit on State land were outside  
5 the wilderness study area and could be mined.

6 It appears we have won the battle and  
7 lost the war because alternative two for the Clay  
8 Bills research natural area, the ACEC calls for  
9 withdrawal of 1,113 acres of mining claims.  
10 Clearly, this would be a taking of our West Burro  
11 Creek deposit. The proposed land exchange with the  
12 State of Arizona would be a taking of the State  
13 mineral leases of the Burro Creek deposit. These  
14 are being proposed for land swaps of the mineral  
15 state.

16 Alternative two effectively would wipe  
17 out our entire investment in the acquisition,  
18 exploration, product development of the entire  
19 Burro Creek saponite deposit. The mining operation  
20 in full production would mine about 30,000 tons of  
21 saponite a year. Surface disturbances from such a  
22 small operation is minimal. And reclamation would  
23 immediately follow the mining operation. The  
24 mining operation really would have no impact on  
25 either thrsatened or endangered species. In fact,

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1 and inanimate matter? I certainly hope not.  
2 Therefore, we recommend management alternative one,  
3 which will allow us to develop this unique mineral  
4 resource which has applications in recycling and  
5 the treatment of hazardous wastes.

6 MS. MARQUIS: Thank you, Ted.

7 Harry Cosner, C-o-s-n-e-r.

8 MR. COSNER: I'm Harry Cosner,  
9 vice-president and general manager for Cyprus  
10 Minerals Company at the Bagdad Copper Corporation  
11 mine in Bagdad, and I'm speaking on behalf of the  
12 company.

13 I'd like to welcome Elaine Marquis and  
14 other representatives of the BLM's Kingman Resource  
15 Management Area. We appreciate the opportunity to  
16 discuss the alternatives relative to future use of  
17 public lands. I also thank the citizens of Bagdad  
18 for their participation in this discussion.

19 Cyprus Bagdad Copper Corporation and  
20 Byner Cattle Company have a long-standing record of  
21 close and harmonious working relationships with the  
22 Bureau of Land Management. We intend to continue  
23 in the spirit of cooperation and would like to  
24 point out that the 4600 acres that are of greatest  
25 concern to us comprise only two-tenths of 1 percent

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1 past experience has shown that the survival of  
2 threatened and endangered species is greatly  
3 improved by a corporate -- cooperative program  
4 between private companies and government land and  
5 wildlife management agencies.

6 The unavailability of saponite from  
7 Burro Creek would not have any devastating economic  
8 consequences of a cutoff similar to the cutoff of  
9 imported oil supply; nevertheless, the Gulf War  
10 which erupted on January 16th is a tragic lesson on  
11 the dependences of foreign supplies and minerals and  
12 mineral fuels.

13 Clearly, saponite is available from the  
14 United Republic of Tanzania and Turkey; however,  
15 the land it cost in east and gulf coast ports is  
16 almost \$500 a ton or 25 cents a pound. That's for  
17 the dried and screened crude product.

18 The choices are do we want to pay this  
19 money to overseas producers when we have minable  
20 deposits here in the United States which support  
21 our State and local economy, purchase goods and  
22 services, and most important, pay taxes to support  
23 our educational system? Or are we, as Iran writes,  
24 in the new left, the anti-industrial revolution  
25 being asked to sacrifice for the sake of seaweeds

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1 of the acreage managed by the Kingman Resource Area  
2 group. This 4600 acres is critical to us as an  
3 economical future tailings area if the Bagdad  
4 operation is to survive beyond the next ten years.

5 Considering our current \$30 million  
6 annual tax burden and our \$20 million annual  
7 unburdened payroll, we are making a considerable  
8 contribution to the economies of the United States  
9 and Arizona. It is critical that we successfully  
10 attain permits for new tailings facilities in the  
11 Mammoth Wash area.

12 Alternative one modified biological  
13 changes in the desert tortoise management boundary  
14 is the only resource management plan that is not a  
15 dire threat to the future of our mine beyond the  
16 year 2000. Based on our proven ore reserves and at  
17 a copper price of 75 cents per pound, we have a  
18 minimum 35-year mine life with the expansion of the  
19 Mammoth Wash tailings area.

20 Other Bagdad staff members will present  
21 more detail of our current operation and future  
22 mining plans. At the conclusion of the prepared  
23 statements, we'd encourage audience participation.  
24 Thank you.

25 MS. MARQUIS: Thank you, Harry.

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1           Bob Cunningham.

2           MR. CUNNINGHAM: My name is Robert

3 Cunningham. I'm manager of administration for

4 Cyprus Bagdad Copper Corporation.

5           Ladies and gentlemen of the audience,

6 members of the panel, the Cyprus Bagdad mining

7 operation, which is a division of Cyprus Minerals

8 Company, has a significant economic impact upon the

9 Bagdad community, Yavapai County, the State of

10 Arizona, and the U.S. government. Drawing the year

11 end at 12/31/90, Cyprus Bagdad paid property taxes

12 in the amount of \$3.4 million to Yavapai County,

13 \$7.6 million for various taxes to the State of

14 Arizona, and \$23.7 million in federal income

15 taxes. In addition, Cyprus employees' tax payments

16 to federal and state agencies should approximate

17 \$3.7 million.

18           By projecting these annual contributions

19 over the anticipated mine life of 35 years, Cyprus

20 will be paying unescalated dollars, 115 million to

21 Yavapai County, \$266 million to the State of

22 Arizona, and \$830 million to the federal

23 government, while Cyprus employees would contribute

24 130 million for state and federal income taxes for

25 the same period.

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23

1 Thank you.

2           MS. MARQUIS: Thank you, Bob.

3           Janette Bush.

4           MS. BUSH: Good evening. My name is

5 Janette Bush. I'm manager of human resources for

6 Cyprus Bagdad Copper Corporation. In that respect,

7 I'm representing Cyprus. I will be speaking on the

8 social, economic, and the employment impact of

9 BLM's current proposal.

10           Cyprus Bagdad directly employs almost

11 700 workers. We are considered one of the largest

12 employers within Yavapai County. With a project

13 mine life of 35 years, we can conservatively

14 estimate more than 20,000 person years of high

15 quality, highly paid employment. More

16 realistically, however, is the total life of mine

17 job opportunities which would significantly exceed

18 30,000 person years of Cyprus Bagdad and statewide

19 employment, as Mr. Cunningham just mentioned.

20           Our community, Bagdad, evolved from a

21 pioneer mining camp more than a century ago, and it

22 is now a peaceful, family-oriented community hidden

23 away in western Yavapai County.

24           Our copper deposit has provided jobs to

25 hard-working individuals since the beginning of the

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1           These projected contributions do not

2 include any indirect impact on the Arizona economy

3 nor direct or indirect purchases of goods and

4 services for the Bagdad operation. For example,

5 the 700 employees on the Bagdad payroll at 12/31/90

6 resulted in 2254 jobs in the State of Arizona. The

7 largest source of direct spending in this regional

8 economy are the Bagdad purchases.

9           There are three major types of

10 purchases: Goods and service, smelting and

11 refining, and utilities, which amounted to \$159

12 million in 1990. Over 79 percent or \$126 million

13 worth of the purchases were made in Arizona. 15

14 percent or \$25 million directly in Yavapai County

15 with a remaining 6 percent or \$9 million occurring

16 outside the state. The forecast for goods and

17 services purchased over the mine life of 35 years

18 can be approximated in current dollars to total

19 \$5,600,000,000.

20           In closing, any changes to the use of

21 public lands which would result in the closing or

22 stoppage of mining and milling activities in the

23 Bagdad operation would have a substantial negative

24 economic impact on the community, Yavapai County,

25 the State of Arizona, and the federal government.

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1 1900s. It is not unusual to see employees retiring

2 after 30 years of service. One recent retiree

3 started working at the mine 42 years ago in 1948.

4 Many of our current employees -- and I see some of

5 you in the audience tonight -- in their 20s, 30s,

6 40s, and 50s look forward to retiring from Cyprus

7 Bagdad just as their fathers and grandfathers

8 have.

9           Many individuals also want to move into

10 this beautiful community to build a future for

11 themselves and their families. Each year several

12 hundred people come from areas throughout the

13 United States just for the opportunity to apply for

14 a job hoping that they may be one of the very few

15 selected for employment.

16           The average weekly earnings including

17 benefits at Cyprus Bagdad along with the rest of

18 the Arizona copper industry are the highest in the

19 state compared with manufacturing, transportation

20 and utilities, public utilities, and government

21 earnings. Annually, payroll and benefits at Cyprus

22 Bagdad are close to \$32 million. We can safely

23 project that well over a billion dollars in wages

24 and benefits can be paid out over the next 35

25 years.

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1           These facts speak for themselves.

2   That's why I found it very unusual that the BLM's

3   draft Resource Management Plan and Environmental

4   Impact Statement totally ignores the potential

5   catastrophic impact that its proposed alternatives

6   could have on jobs and families not only in Bagdad,

7   but throughout the state. By not including the

8   social and economic impacts such a decision would

9   have, makes the EIS inadequate. Thank you.

10           MS. MARQUIS: Dan Mead.

11           MR. MEAD: Good evening. My name is

12   Daniel Mead, manager of Byner Cattle Company. We

13   own and operate an active cow, calf and cattle

14   ranch in Mohave and Yavapai Counties. We are

15   speaking here this evening because of the Kingman

16   Resource Area Management Plan and Environmental

17   Impact Statement.

18           Alternatives two and three will have a

19   negative impact on our operation. Burro Creek

20   splits our ranch, the Bagdad Allotment, in half.

21   One-third of the ranch is now an Upper Burro Creek

22   wilderness area passed by Congress on November 28,

23   1990. The Bagdad Allotment Ranch has been an

24   active cattle ranch for close to 100 years.

25   Previous owners and operators have always worked

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1   hours. And it is virtually noiseless.

2           Modern technology is not cheap. The

3   cost to Byner over the last years has been in

4   excess of \$25,000 for drilling and installation.

5   The money spent on the ranch from the 1970s to

6   date, with the exception of \$1200, has been out of

7   pocket by owner/operator of the ranch. Many, many

8   thousands of dollars.

9           The practices and attitudes mentioned so

10   far -- and I'd like to restate this, please -- the

11   practices and attitudes mentioned so far is why

12   Burro Creek is what it is today, an area of great

13   desirability by its many different users.

14           Byner's willingness to work with the BLM

15   is also orchestrated in other forms. We have had

16   extensive land slots, over 3400 acres, traded to

17   the BLM to allow for better management of their

18   land and to control areas that are sensitive.

19           Example: Six-Mile Crossing on the Burro

20   Creek for recreation and camping, the Carrow Ranch

21   Historical Site at Wikieup on the Big Sandy River

22   in which we traded land and gave historical

23   buildings for preservation. Byner withdrew from

24   grazing on the allotment, over 640 acres, for the

25   preservation of the endangered Arizona cliffrose

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1   very closely with the BLM in the preservation of

2   its natural resources. Its environmental concerns

3   had always kept it open throughout the years.

4           Beginning in the early 1970s, the owners

5   and operators of the ranch took a proactive

6   attitude establishing a number of windmills,

7   earthen tanks, drinkers, and salt licks to

8   encourage uniform livestock distribution and ensure

9   proper utilization of the Burro Creek riparian

10   area.

11           The plan for the livestock grazing

12   through these years of the '70s and '80s was to

13   always stock lightly, never to overstock or take

14   unfair advantage or encourage heavy grazing when

15   years of good vegetation and water were available.

16   The trend from the '70s and '80s has not stopped,

17   but intensified.

18           In 1987 Byner with the BLM developed

19   additional waters to encourage grazing away from

20   the Burro Creek. Byner, in establishing the new

21   water, has installed solar water pumping units

22   instead of the traditional windmills. The low

23   profile of the solar unit makes it blend with the

24   environment. It's very efficient, which stimulates

25   water conservation, pumping only in daylight

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1   plant. An enclosure was built around the acreage,

2   and livestock and burros are now kept from entering

3   the area.

4           On December 1st, 1989, Byner listened to

5   the proposal for an ACEC in the Burro Creek

6   region. No mention of wild and scenic rivers, no

7   mention of tortoise designation one, two, and

8   three. We were asked by the BLM to have input into

9   ACEC designations on Burro Creek. We did so in

10   person and in writing on January 25, 1990,

11   objecting to the total acreage -- the total ACEC

12   acreage concept and presenting site-specific

13   areas. It was a point of which we -- the BLM and

14   Byner could start from.

15           We were told we would be contacted after

16   the BLM had reviewed our material. When we left

17   the BLM on January 25th, 1990, to today's date, no

18   further verbal discussions ever occurred. Byner

19   made several contacts with the BLM to see what was

20   going on, but were put off. Our conclusion today

21   is that our input was not needed, and our reply is

22   in the one and three-quarter inch thick book

23   stating alternative two is the most desirable.

24           Byner today wishes to express deep

25   concern for the unassessed impact on ranchers by

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1 the highly restrictive management proposed for the  
 2 ACBC, wild and scenic rivers, and categories one  
 3 and two, tortoise management areas. Elimination of  
 4 grazing and vehicular access to wells, springs, and  
 5 range improvements could put not only Byner but  
 6 many ranchers out of business. The tortoise  
 7 habitat is extremely widespread through about 60  
 8 percent of Arizona, and there is no valid  
 9 scientific data indicating that the Sonoran Desert  
 10 tortoise is threatened or in danger.

11 The closing of washes to motor vehicles  
 12 would virtually eliminate access to immense  
 13 acreages of ranch land effectively establishing  
 14 huge wilderness, which would join to the north the  
 15 Upper Burro Creek wilderness area in lands that  
 16 were designated for multiple use by Congress on  
 17 November 28, 1990.

18 On page 1 of the KRA RMP/EIS, the last  
 19 paragraph, left-hand column, states the RMP and EIS  
 20 does not address livestock grazing. Because the  
 21 EIS fails to address the impact on ranching and  
 22 mining, the two most important industries in the  
 23 Kingman Resource Area, alternatives two and three  
 24 are totally unacceptable. Alternative one, with  
 25 reasonable modification to the proposed categories

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1 approximately ten years of storage in Mulholland  
 2 and Mammoth tailing storage areas. That's the only  
 3 capacity left in those storage areas; therefore,  
 4 expansion of present and development of new tailing  
 5 storage areas will be required for approximately 25  
 6 more years of mine production.

7 The primary concern with this draft  
 8 Resource Management Plan and Environmental Impact  
 9 Statement is the land use restrictions specified  
 10 and implied by alternatives two and three.

11 Category II desert tortoise management areas  
 12 combined with special management areas proposed by  
 13 the BLM in alternative two and three have a real  
 14 potential to reduce mine life from 35 to 10 years  
 15 due to restrictions on future tailing storage area  
 16 sites.

17 If tailing stabilization and reclamation  
 18 is a concern to the BLM, Cyprus Bagdad has  
 19 previously demonstrated a willingness and ability  
 20 to effectively stabilize inactive tailing areas.

21 During the late 1970s Cyprus Bagdad  
 22 voluntarily established a self-perpetuating and  
 23 effective vegetative cover on an area called  
 24 Kimberly tailing and that has successfully  
 25 controlled erosion.

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1 one, two, and three, tortoise habitat management,  
 2 is the only supported alternative. Here again, it  
 3 requires our input.

4 We wish to conclude our statements by  
 5 stating our doors are always open for discussion.  
 6 Much work could be accomplished on the Burro Creek  
 7 and Wikieup with Byner and the BLM continuing joint  
 8 efforts working on water improvements, fencing and  
 9 grazing, land exchanges, and range improvements.  
 10 The key to success is through open minds and open  
 11 communications of both parties. Thank you.

12 MS. MARQUIS: Thank you, Dan.

13 Guy Granger.

14 MR. GRANGER: Thank you.

15 Good evening. My name is Guy G.  
 16 Grainger, junior plant department manager for  
 17 Cyprus Bagdad Copper Corporation. I'd like to  
 18 speak on behalf of Cyprus Bagdad Copper  
 19 Corporation. My department is responsible for the  
 20 operation and maintenance of the tailing storage  
 21 areas and the reclaim water return systems.

22 Cyprus Bagdad Copper, as mentioned  
 23 earlier, has 35 years of ore that's economical to  
 24 mine and process at 75-cent-a-pound copper prices.  
 25 Presently, Cyprus Bagdad Copper Corporation has

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1 If water quality of Burro Creek and its  
 2 tributaries is a concern to the BLM, Cyprus Bagdad  
 3 operates a network of collection ponds, pump backs  
 4 with standby power generators, flood control basins  
 5 and ditches to prevent process water discharge into  
 6 surrounding streams. The leach and tailing storage  
 7 areas are operated as zero discharge system. All  
 8 process water is recycled back to the leach SXEW  
 9 and the mill for reuse.

10 Also Cyprus Bagdad operates leach and  
 11 tailing storage areas in accordance with our  
 12 National Pollutant Discharge Elimination System --  
 13 that's NPDES -- permit and submits monthly reports  
 14 to the Environmental Protection Agency, EPA, and  
 15 Arizona Department of Environmental Quality, ADEQ.

16 Of the two and a half million acres in  
 17 the Kingman Resource Area, Cyprus Bagdad requires  
 18 about 4600 acres or two-tenths of 1 percent for  
 19 future tailing storage areas. That's for the  
 20 35-year mine life plan. Of those 4600 acres, only  
 21 2400 acres, which is about a tenth of 1 percent of  
 22 the two and a half million acres conflict with the  
 23 special management areas in Category II desert  
 24 tortoise management areas in alternatives two and  
 25 three.

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1 In conclusion, Cyprus Bagdad Copper  
2 Corporation recommends adoption of alternative one  
3 with modifications to the desert tortoise  
4 boundaries to insure we have a long-term future.  
5 The special management areas in Category II desert  
6 tortoise areas proposed by the BLM in alternatives  
7 two and three do not adequately address or consider  
8 alternative land uses such as tailing storage.  
9 Thank you.

10 MS. MARQUIS: Thank you, Guy.  
11 Kent Watson.

12 MR. WATSON: Good evening. My name is  
13 Kent Watson. I'm a mine manager at Cyprus Bagdad  
14 Copper Corporation. My department is responsible  
15 for planning and development of the ore reserve and  
16 extraction of the ore. In addition, we have the  
17 responsibility of maintaining the Francis Creek  
18 Water System.

19 My comments tonight refer to the  
20 responsibility of the BLM regarding the stewardship  
21 of public lands. In this case, specifically, to  
22 encourage mineral exploration and development as  
23 mandated by the 1872 Mining Law.

24 It seems that the BLM recognizes  
25 responsibility to the public in the resource

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1 potential negative effect upon is our water  
2 supply. The special management area as outlined  
3 could eventually cut off the mine, the mill, and  
4 town site from existing water sources. Both the  
5 Francis Creek and Wikieup water lines cross  
6 portions of Burro Creek that have been designated  
7 as areas of critical environmental concern and  
8 nominated for inclusion in the wild and scenic  
9 river system under alternatives two and three. The  
10 proposed alternatives would not allow necessary  
11 access to these systems for required maintenance  
12 and/or replacement of various components in these  
13 systems.

14 Further, we are very concerned that if  
15 condemnation proceedings took place under the Wild  
16 and Scenic Rivers Act, we would lose a critical  
17 primary source of water from Francis Creek. To put  
18 all this into perspective regarding lost mineral  
19 reserves now, that production through the end of  
20 the currently anticipated 35 -- excuse me --  
21 35-year mine life at the Bagdad is estimated to be  
22 6.5 million pounds of copper, 290 million pounds of  
23 molybdenum, and 20 million troy ounces of silver.

24 At today's metals prices, this life of  
25 mine production -- keeping in mind we're talking a

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1 management plan where on page 7 there are listed  
2 four more recent acts or policies, and I quote,  
3 "that direct the BLM to actively encourage and  
4 facilitate the development of public land mineral  
5 resources by private industry, to satisfy local and  
6 national needs, and provide for economically and  
7 environmentally sound exploration, extraction, and  
8 reclamation. This policy recognizes that mineral  
9 exploration and development can occur while  
10 insuring protection of other resource uses and  
11 promotes multiple use of public lands." End of  
12 quote.

13 We actively support this philosophy, but  
14 it appears that the BLM may not when you consider  
15 the very negative implications to Cyprus Bagdad  
16 that the BLM's preferred alternatives two and three  
17 would have. These alternatives would severely  
18 restrict continued economic development of  
19 minerals. These alternatives would also curtail  
20 exploration and therefore restrict future mineral  
21 development. This would hold true not only in the  
22 Bagdad area, but could affect other operations  
23 within the Kingman Resource Area.

24 Another aspect of the Bagdad operation  
25 the alternatives two and three could have a

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1 35-year life of mine -- would be valued at  
2 approximately \$8.1 billion. Combined with wages,  
3 benefits and taxes, outside purchases, and so forth  
4 that you already heard about, you can understand  
5 that this represents a significant contribution to  
6 local, county, and state economies.

7 Alternatives two and three would prevent  
8 us from extending our mine life by curtailing  
9 required exploration of surrounding areas, but most  
10 importantly, it could cut the mine life by  
11 two-thirds. By restricting the development of  
12 tailings disposal area and possibly even more  
13 drastic shortening of the mine life would occur if  
14 our sources of water were removed.

15 In conclusion, considering the  
16 implications of alternatives two and three, the  
17 future metals production of Cyprus Bagdad Copper  
18 Corporation and the potential ramifications to our  
19 water supplies, alternative one, modified  
20 biological changes to the desert tortoise  
21 management boundary, is the only plan that would  
22 not adversely impact the mine and Bagdad's future.  
23 Management -- special management areas and Category  
24 II desert tortoise areas proposed under  
25 alternatives two and three do not adequately

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1 address or consider alternatives -- alternative  
 2 land uses such as our existing water supply  
 3 systems. Thank you.

4 MS. MARQUIS: Thank you, Kent.  
 5 Scott Lewis.

6 MR. LEWIS: Good evening. My name is  
 7 Scott Lewis. I'm the environmental coordinator  
 8 here at Cyprus Bagdad Copper Corporation. I would  
 9 like to thank the BLM for scheduling this meeting  
 10 in Bagdad and agreeing to a hearing format followed  
 11 by an informal question-and-answer period.

12 During my review of the Kingman Resource  
 13 Area draft Resource Management Plan and  
 14 Environmental Impact Statement, I asked myself two  
 15 questions: First, is the draft EIS adequate, and  
 16 second, is the BLM's preferred alternative two  
 17 suitable. Upon completing my review of the  
 18 document, I was convinced that the draft EIS is not  
 19 adequate and that both alternatives two and three  
 20 are unacceptable. Let's explore why I drew these  
 21 conclusions.

22 Several of the previous speakers have  
 23 indicated the draft RMP and EIS is inadequate  
 24 because it does not address the significant  
 25 economic and social impacts of alternatives two and

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1 acres of Bagdad's active tailings and an additional  
 2 300 acres previously approved for tailings  
 3 disposition under a plan of operations issued to us  
 4 by the Arizona State Land Department.

5 An additional 800 acres of State lands  
 6 included within the Category II desert tortoise  
 7 boundaries are being considered for future tailings  
 8 sites. Most of these 800 acres were previously  
 9 described and/or shown to the BLM during the public  
 10 hearings held on the wilderness study areas within  
 11 the past year. Approximately 5500 acres of  
 12 existing tailings, pit area, dumps, and town site  
 13 are included within the Category III desert  
 14 tortoise boundaries.

15 Considering these discrepancies, the BLM  
 16 should, at a minimum, reevaluate the Category I,  
 17 II, and III boundaries relative to criterion two,  
 18 "Conflict Resolvability," in the publication titled  
 19 Desert Tortoise Habitat Management on Public Lands.  
 20 A Range-wide Plan. Preferably, the BLM should hold  
 21 off on designating any desert tortoise category  
 22 boundaries until a decision is made by the U.S.  
 23 Fish and Wildlife Service on whether to list the  
 24 Sonoran population of the desert tortoise in  
 25 Arizona as a threatened species. The reason for

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1 three on the mining industry, livestock industry,  
 2 Yavapai or Mohave Counties, or the State of  
 3 Arizona.

4 The document is inadequate since it is  
 5 essentially devoid of technical data required to  
 6 evaluate and needed to justify alternatives two and  
 7 three.

8 The RMP/EIS is also inadequate because  
 9 it adopts numerous other documents by reference  
 10 which complicates review, evaluation, and  
 11 understanding of the document.

12 Alternatives two and three are not  
 13 acceptable because multiple, unjustified, and in  
 14 some areas, conflicting special management area  
 15 designations occur in the same area.

16 Now I would like to specifically address  
 17 the desert tortoise management areas proposed under  
 18 all three alternatives in the RMP/EIS.

19 This map to my left essentially is a  
 20 blowup of the Bagdad area that has a few familiar  
 21 landmarks. Town site. The pit area. Blue is our  
 22 existing tailings. Let's look at the blue first.

23 The Category II desert tortoise area  
 24 shown in the Kingman Resource Area draft RMP/EIS,  
 25 which is this red line, include approximately 400

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1 holding off is that there will inevitably be  
 2 conflicts between critical habitat as defined in  
 3 the Endangered Species Act and the four criteria  
 4 used to delineate the I, II, and III areas.

5 Specifically, the three category  
 6 delineations are not based on physical or  
 7 biological features used to define critical  
 8 habitat. Furthermore, a review of the information  
 9 available at the BLM's Kingman office revealed that  
 10 a very limited amount of field data, most of which  
 11 dates back to 1978, was used in delineating the  
 12 category boundaries.

13 Based upon the sparse amount of transect  
 14 data available in this area, we believe that  
 15 insufficient data exists to accurately delineate  
 16 the Category I, II, and III desert tortoise  
 17 boundaries in the vicinity of the Bagdad mine. We  
 18 do recognize and appreciate the concerns related to  
 19 the management and protection of the desert  
 20 tortoise, but sound, scientific data must be used  
 21 in dividing the areas essential to the perpetuation  
 22 of the species in order to insure multiple use of  
 23 our public lands.

24 Another section of the RMP I would like  
 25 to address is the wild and scenic rivers

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1 nomination. Alternatives two and three of the  
 2 draft RMP/EIS proposed to nominate Burro Creek and  
 3 Francis Creek for inclusion in the wild and scenic  
 4 river system with minimal justification. We do not  
 5 understand why these two creeks are being nominated  
 6 for the following reasons:

7       The majority of the land along Burro and  
 8 Francis Creeks is federally owned and controlled.  
 9 The segments of land along these two creeks that  
 10 are owned by CBC and managed by Byner Cattle  
 11 Company are grazed in a manner designed to protect  
 12 and enhance the riparian habitat. Since the BLM  
 13 has direct control over activities on the federal  
 14 land along these two creeks, and our operations  
 15 here at Bagdad are designed to avoid adverse  
 16 impacts on water quality and avoid alteration of  
 17 the free-flowing nature of these two creeks, we see  
 18 no reason for including Burro and Francis Creeks in  
 19 the wild and scenic river system.

20       The majority of the protection of the  
 21 two creeks afforded under the Wild and Scenic --  
 22 Wild and Scenic River Act will be accomplished by  
 23 implementing the riparian management plan described  
 24 under alternative one. We are extremely concerned  
 25 that the visual impact analysis methods used by the

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1 management area proposed under alternatives two and  
 2 three. Essentially, what I would like to say is --  
 3 look at the map here -- in this Six-Mile Crossing  
 4 Burro Creek area there are three so-called layers  
 5 of management prescriptions: Wild and scenic  
 6 rivers, special recreation, and ACEC raises, I  
 7 think, a logical question, and that is, how exactly  
 8 does the BLM intend to manage an area with three  
 9 potentially conflicting designations?

10       In summary, the draft EIS is not  
 11 adequate to do several important issues that are  
 12 not addressed. And alternatives two and three of  
 13 the RMP/EIS are not acceptable because of the  
 14 multiple, unjustified, overly restrictive, and in  
 15 some, conflicting special management areas  
 16 designated in a particular location. Alternative  
 17 one, with appropriate modifications to the desert  
 18 tortoise management boundaries, is the only  
 19 acceptable alternative. Thank you.

20       MS. MARQUIS: Thank you, Scott.  
 21       Phil Blacet.  
 22       MR. BLACET: My name is Phil Blacet.  
 23 I'm senior geologist here at Cyprus Bagdad, and I  
 24 wish to speak on behalf of not only Bagdad, but I  
 25 hope a lot of the people in the room.

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1 BLM will severely restrict or prohibit the  
 2 development of future tailing sites within the area  
 3 visible from these two creeks if designated as wild  
 4 and scenic rivers; particularly since the Wild and  
 5 Scenic River Act does not contain the no buffer  
 6 zone provision included in the Arizona Desert  
 7 Wilderness Act of 1990.

8       Another area that I will briefly discuss  
 9 are the areas of critical environmental concern.  
 10 The extensive areas of critical environmental  
 11 concern proposed under alternatives two and three  
 12 of the RMP/EIS are not acceptable because they have  
 13 the potential to severely restrict maintenance,  
 14 operation, and future replacement of existing power  
 15 lines, gas lines, and water lines that are vitally  
 16 important to the continued existence of the mine,  
 17 mill, and town site. The ACEC's limit of  
 18 off-highway vehicle use to designated roads,  
 19 trails, and crossings in the Burro Creek and  
 20 Francis Creek riparian areas are with no definition  
 21 of, quote, designated roads or delineation of  
 22 riparian areas on the -- in the maps -- on the maps  
 23 in the RMP/EIS.

24       Another designation that I would like to  
 25 briefly discuss is the special recreation

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1       Only a few months have passed since  
 2 Congress and the President enacted the historic  
 3 Arizona Desert Wilderness Act of 1990. After  
 4 exhaustive deliberation of all the issues and  
 5 massive documentation of resource data, as well as  
 6 written comment and testimony given at public  
 7 hearings throughout the state, our congressional  
 8 delegation specifically rejected the BLM's  
 9 recommendation to designate a Lower Burro Creek  
 10 wilderness area.

11       Over a two-year period, the Arizona  
 12 delegation reviewed the facts and considered the  
 13 expressed opinions of thousands of people on the  
 14 Burro Creek issue. Their decision to delete the  
 15 Lower Burro Creek area from the Wilderness Act was  
 16 based, primarily, on the devastating long-range  
 17 impact that wilderness designation could have on  
 18 the Cyprus Bagdad operation, the people of Bagdad,  
 19 and the state and regional economy.

20       Cyprus Bagdad is the largest tax-paying  
 21 employer in Yavapai County. And with a future life  
 22 expectancy of at least 35 years, the Bagdad mine is  
 23 developing one of the largest copper deposits in  
 24 North America. Bagdad's currently active Mammoth  
 25 Wash tailings facility, as we have heard, will be

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1 full to capacity in about ten years. If  
 2 unnecessarily restrictive BLM's special management  
 3 areas are designated in the Burro Creek area, for  
 4 example, their proposed wild and scenic river ACEC  
 5 and tortoise habitat management areas, Cyprus  
 6 Bagdad may be denied the permits needed to  
 7 construct new tailings facilities, forcing a  
 8 shutdown in about ten years.

9           Such a forced mine closure would result  
 10 in at least 25 years of lost mineral production and  
 11 a loss to Arizona and the Nation's economy  
 12 estimated at somewhere between \$8 and \$9 billion.  
 13 The total loss of personal income and much-needed  
 14 tax revenues alone would probably exceed \$1  
 15 billion.

16           By rejecting the BLM's recommendation  
 17 for Lower Burro Creek wilderness and by adding a  
 18 precedent-setting no buffer zone clause to the 1990  
 19 Wilderness Act, Congress has made clear its intent  
 20 to preserve and protect the vast mineral and  
 21 economic resources of the Bagdad area.

22           Now, however, the BLM is recommending a  
 23 management plan, specifically alternative two of  
 24 its Kingman Resource Area Resource Management Plan,  
 25 that would circumvent congressional intent to

1 most important resources industries in the region,  
 2 that is, mining and ranching, but it recommends  
 3 management changes that would curtail or eliminat  
 4 mining throughout large areas.

5           Having served as a resource specialist  
 6 for the Department of Interior for 16 years, I can  
 7 appreciate the apparent dilemma facing the BLM.  
 8 They, no doubt, feel caught between the proverbial  
 9 rock and a hard spot; multiple land use advocates  
 10 on one side, environmental proponents on the  
 11 other. In the case of the Burro Creek area,  
 12 however, this dilemma has been clearly resolved, at  
 13 least in my thinking, by the recent congressional  
 14 decision to return these public lands to  
 15 multiple-use management.

16           In conclusion, with the enactment of the  
 17 1990 Arizona Desert Wilderness Act subsequent to  
 18 the publication of the Kingman Resource Area's  
 19 draft RMP/EIS, the BLM now needs to reevaluate and  
 20 revise their management proposals, especially  
 21 alternatives two and three and tortoise habitat to  
 22 conform to recent congressional mandate and the  
 23 best interests of the people of Arizona. In their  
 24 final RMP/EIS, I urge the BLM to address impacts on  
 25 all of the important resources in the Kingman

1 protect these resources and could reverse the  
 2 Wilderness Act's provision that these Lower Burro  
 3 Creek public lands be returned to multiple-use  
 4 management. The BLM's preferred course of action,  
 5 that is, alternative two, is in direct conflict  
 6 with new federal law established under the 1990  
 7 Wilderness Act and appears to defy the expressed  
 8 will of Congress and the people.

9           In addition to the BLM's plan under  
 10 alternatives two and three, the plan which would  
 11 close large areas to mining and mineral  
 12 development, they are proposing tortoise habitat  
 13 management which would outlaw or drastically reduce  
 14 ranching and mining and recreational use of very  
 15 large areas within the Bagdad region and elsewhere  
 16 in Mohave County.

17           Alternatives two and three and proposed  
 18 tortoise habitat management are unnecessarily  
 19 restrictive and do not represent a return to  
 20 multiple-use land management. Under federal law,  
 21 the BLM is directed, and I quote, to promote the  
 22 development of the mining resources of the United  
 23 States.

24           The BLM Kingman Resource Area's draft  
 25 RPM not only fails to adequately address the two

1 Resource Area.

2           The BLM should be commended for a  
 3 thorough job in providing special management areas  
 4 relating to scenic, cultural, and wildlife  
 5 resources. Unfortunately, management to protect  
 6 and again to promote the development of the mining  
 7 resources seems to have been entirely overlooked.  
 8 Thank you.

9           MS. MARQUIS: Thank you, Phil.  
 10           Manford Swain.

11           MR. SWAIN: Good evening, ladies and  
 12 gentlemen and members of the panel. My name is  
 13 Manford Swain. I'm here this evening as a local  
 14 resident, a representative of Cyprus Bagdad, and  
 15 also a member of the Bagdad homeowners.

16           My main concern is the proposed  
 17 boundaries of the Category I and Category II desert  
 18 tortoise management areas; specifically, that area  
 19 lying north and east of Highway 93 and south of  
 20 Burro Creek to its intersection for the Burro Creek  
 21 bridge. What I'd like to do is kind of outline it  
 22 on this map. We don't have a complete map of the  
 23 area, but basically, we are covering this area  
 24 right here.

25           In the late '50s and early '60s there

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1 were a few old prospectors and other people living  
2 out in this area and quite a bit of activity in  
3 developing mineral resources and water for the  
4 cattle. Roads were constructed to many of these  
5 sites and the use of the dry sand washes was  
6 extensive. Due to the rugged nature of this  
7 terrain, access to land is highly dependent upon  
8 these roads and truck trails following these  
9 washes. The proposed Category I and II desert  
10 tortoise habitat management would outlaw vehicular  
11 access along these washes, effectively eliminating  
12 access to land and creating a de facto wilderness  
13 throughout huge areas west and southwest of  
14 Bagdad. Historic access roads, including the old  
15 highway to Burro Creek at Six-Mile Crossing could  
16 be closed because a major portion of its route is  
17 in a dry sand wash. Another item to consider is  
18 because of these proposed closings, the only public  
19 access to Burro Creek above the high bridge on  
20 Highway 93 could be only from the Mikieup area.

21 At this point in time, I do not  
22 understand why the BLM is proposing to outlaw motor  
23 access along these washes. They have been and will  
24 continue to be very important thoroughfares for  
25 access to hundreds of valid mineral mine claims,

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1 been asked to come here to add a couple comments on  
2 behalf of Cyprus Bagdad, and I really do not have  
3 much to add to the previous comments.

4 I think they have summed up the issues  
5 fairly well and the main thing that I would like to  
6 do is state for the record that it's Cyprus'  
7 position that based on the points presented this  
8 evening, that the only supportable alternative  
9 presented in the management plan is alternative one  
10 with appropriate modifications to the desert  
11 tortoise habitat categories and their boundaries.  
12 Cyprus feels that the proposed actions of the  
13 preferred alternative two or even alternative three  
14 is unsuitable in view of BLM's legal mandate to  
15 manage federal lands on the basis of a balanced and  
16 multiple use and sustained yields.

17 Further, Cyprus finds inadequate support  
18 in the BIS for proceeding with alternative three or  
19 alternative two.

20 Additionally, as a point not yet  
21 addressed in any of the earlier speakers'  
22 statements, we direct the BLM's attention to the  
23 fact that the plan fails to address how the BLM  
24 will acquire the private and State lands that is  
25 stated as necessary to implement alternative one --

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1 most of the windmills, and developed water  
2 resources of the area.

3 If I were a betting man, I'd bet that  
4 there is far more impact to the desert tortoise  
5 population along Highway 93 than there is in all  
6 the sand washes in this area. In 35 years I have  
7 been traveling these same washes, and I do not  
8 recall ever seeing a desert tortoise in the wash,  
9 and to my knowledge, I have never ran over one.

10 In closing, I urge the BLM to reconsider  
11 their preference for alternative two, which would  
12 eliminate access to very large areas of  
13 multiple-use public land, and in effect, would  
14 create wilderness in the same areas that Congress  
15 has rejected for wilderness designation. And  
16 instead, take another look at alternative one with  
17 sensible changes to these Category I and Category  
18 II desert tortoise management areas, which I would  
19 believe to be a more conservative and level-headed  
20 approach. Thank you.

21 MS. MARQUIS: Thank you, Manfred.

22 Cory Bromley.

23 MR. BROMLEY: Good evening, ladies and  
24 gentlemen. My name is Cory Bromley. I'm from  
25 Cyprus Minerals Company out of Inglewood. I have

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1 excuse me -- alternative two and alternative three,  
2 especially in light of the fact that the Arizona  
3 Supreme Court has held that the land exchange or  
4 the exchange of State lands is unconstitutional and  
5 that the subsequent result of the ballot issue that  
6 would allow the exchange of State lands was  
7 rejected by the voters of this state.

8 In summation, Cyprus requests that  
9 the BLM reevaluate its plan based on the comments  
10 given this evening and place more emphasis on the  
11 mandate -- that legal mandate of management for  
12 multiple use and encouraging mineral production and  
13 to give a more balanced view to the overemphasis on  
14 the ecological concerns stated in the management  
15 plan as present.

16 Cyprus would urge that the BLM take into  
17 account tonight's comments and conclude that  
18 alternative one with the appropriate and logical  
19 modifications to the desert tortoise habitat  
20 boundaries be the preferred alternative and take  
21 into account that the mining interest as stated  
22 over and over tonight are something that needs to  
23 be addressed in this plan. Thank you.

24 MS. MARQUIS: Thank you, Cory.

25 Joe Mortimer.

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1 MR. MORTIMER: Good evening. My name is  
2 Joseph Mortimer, and I'm here as a citizen of  
3 Bagdad.

4 And my primary concern is the expansion  
5 of the wilderness boundaries as ACEC or desert  
6 tortoise habitat. I first looked on the wilderness  
7 area several years ago, and I'm sure that it was a  
8 wilderness then. The designation of wilderness has  
9 changed that area very little. It has always been  
10 difficult to penetrate and a very rugged area.

11 Mining has gone on in the Bagdad area  
12 for over 100 years. And has neither this  
13 wilderness nor the wildlife nor the desert tortoise  
14 been harmed by the mining or ranching in the area.

15 When I look at Bagdad, I see a community  
16 of approximately 2500 people. And they make a  
17 productive and worthwhile contribution to the  
18 American way of life in Arizona and in the United  
19 States. And the town is clean. And the mine is in  
20 compliance with all the environmental laws.

21 And it concerns me and it frightens me  
22 even to think that the wilderness programs and  
23 wildlife protection programs that are allegedly --  
24 people who are in the programs would threaten to  
25 potentially send 2500 people down to the streets of

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1 washes from the use of retired people, it's going  
2 to cause a hardship on them and hardship on the  
3 County.

4 We have been talking about the money  
5 that's coming from the company. I'm talking about  
6 the money coming from outside. I think that a  
7 wilderness areas is the biggest waste of natural  
8 resources you can possibly put -- burden people  
9 with. It's very discriminatory -- very  
10 discriminatory against aged and cripples and the  
11 young people. There is a few people and I have  
12 names for them, but I won't tell, they put packs on  
13 their back. I did that when I was 25 years  
14 younger. But I'm going to be very unhappy with the  
15 tortoise when I have to get out of my vehicle and  
16 start walking. It's as fat as I am. I think you  
17 should look at other things, rather than just the  
18 money being lost from the company. You should take  
19 a wider look at the people actually using the  
20 washes and roads you want to cut off. Thank you.

21 MS. MARQUIS: Thank you. For your  
22 record -- For our record, can we have your name?

23 MR. VAUGHN: Troy Vaughn, resident of  
24 Bagdad for last 42, 43 years.

25 MS. MARQUIS: V-a-u-g-h-n?

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1 Phoenix as homeless and a burden on society. And I  
2 think it's imperative to prevent this formal  
3 designation of a wilderness in the Burro Creek area  
4 destroy the American way of life here in Bagdad.  
5 Thank you very much.

6 MS. MARQUIS: Thank you, Joe.

7 That is the total list that I have for  
8 people who have indicated they'd like to speak, but  
9 in case there is anyone else that would like to  
10 formally speak or make a statement with the court  
11 reporter here. I open it up to anybody else that  
12 would like to come up and make a statement.

13 Well, with that, I think we can conclude  
14 the formal portion and recorded portion of the  
15 meeting, and I thank you all for participating.  
16 And I'd like to open it up for informal questions  
17 or comments and clarification of any points that  
18 you may have.

19 MR. VAUGHN: I'd like to speak on the  
20 behalf of the entire east. I just came from  
21 Quartzite. Spent a week down there.

22 Quartzite retirees bring a lot of money  
23 to this state and this area. They use a four-wheel  
24 vehicle to look at the country to see their scenic  
25 views. If you cut out these roads and these sand

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1 MR. VAUGHN: Yes.

2 MS. MARQUIS: Thank you. Anyone else  
3 wishing to make a statement?

4 MR. JACKSON: Nate Jackson, resident  
5 here for almost ten years. My dad worked for the  
6 National Park Service. I know what a pristine area  
7 is. It is not an area for roads. It is not an  
8 area that has cattle graze on it. Not an area  
9 where there is power lines, gas lines, water  
10 lines. You can't make a wilderness area, whatever  
11 you want to call it. That's what it's turning out  
12 to be. You can't make a wilderness area out of  
13 something that is not one already. You can't make  
14 wilderness. Wilderness has to be there. There is  
15 places in the Mogollon Rim, other areas that man  
16 has hardly been in there at all, that the only way  
17 in is by foot. That's wilderness.

18 There's been countless trucks and people  
19 in that area. It's not a wilderness area, and like  
20 he said, it should be open to other people. There  
21 is a lot of other things to consider besides -- our  
22 concern is our basic, but just to try and make a  
23 wilderness area out of something that isn't is  
24 something --

25 MS. MARQUIS: Thank you. Could you

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1 repeat your name, please?  
 2 MR. JACKSON: Nate Jackson.  
 3 MS. MARQUIS: Nate Jackson?  
 4 A SPEAKER: I think I get really  
 5 disappointed if I get up hiking in a wilderness  
 6 area. You get a lot of letters from people that  
 7 thought they were coming from a wilderness area.  
 8 MS. MARQUIS: Any other comments before  
 9 we close off the formal portion?  
 10 MR. BIPES: Vernon Sipes, resident for  
 11 42 years here in the Bagdad area. I would like to  
 12 make a statement referring to what someone said  
 13 about the desert tortoise. I have seen desert  
 14 tortoises probably from here to Wickenburg, from  
 15 here to Hillside, past Hillside. Seen them  
 16 everywhere. Seen a lot of them over on the  
 17 highways. Never seen one in the washes. So if we  
 18 are going to shut anything down, we can shut the  
 19 highways down. That's what's killing the desert  
 20 tortoises.  
 21 MS. MARQUIS: Thank you.  
 22 I will address the issue of desert  
 23 tortoise, their habitat in washes. There seems to  
 24 be a confusion of the different habitats and I will  
 25 go through that. And you're right, in this area,

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1 categories were designated -- information  
 2 designated these areas as critical areas. I have  
 3 not seen a concentration of desert tortoise in the  
 4 Burro Creek area any more so than I have seen them  
 5 out towards Hillside or anywhere, and as you  
 6 mentioned, the trails, washes, and things will be  
 7 designated for travel.  
 8 We will make these designations once  
 9 these regulations go into effect, and also, who  
 10 will burden the cost of monitoring these areas and  
 11 policing these areas to see that everything is  
 12 carried out? I think the areas have done quite  
 13 well under the present management system.  
 14 As far as the riparian areas, 25 years  
 15 ago or so I very seldom saw an eagle in the Lower  
 16 Burro Creek area and now every time I visit that  
 17 area, I have seen eagles. I think that they have  
 18 increased in population. I think that is due to  
 19 proper education that these fine birds should not  
 20 be destroyed when spotted.  
 21 MR. MURPHY: My name is Lloyd Murphy. I  
 22 have been here for 40 years. And I enjoyed Lower  
 23 Burro Creek crossings, Upper Burro Creek as a kid.  
 24 And I'm just wondering how far we are  
 25 going to go as far as people in taking things away

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1 they do not inhabit the washes. And we are not  
 2 proposing the washes to be shut down. Our ORV,  
 3 which is off-highway vehicle use in our document --  
 4 if you can take a real close look at it -- for this  
 5 whole area is designated for roads, washes, trails,  
 6 et cetera that are currently being used for  
 7 vehicles. And I will be more than happy to explain  
 8 that even further, but I'd rather wait and just do  
 9 it informally because we don't need my portion on  
 10 the record.  
 11 MR. COLVILLE: I'm Mike Colville. I'm a  
 12 concerned citizen. I lived in Bagdad most of my  
 13 life. I've wandered up and down the Burro Creek  
 14 area for the last 42 years and I've enjoyed it. I  
 15 realize Burro Creek has had its ups and downs.  
 16 There has been floods that have devastated the  
 17 area. There have been overpopulation of wild  
 18 burros, quite a bit of damage in the area, also  
 19 there is very little water available in Lower Burro  
 20 Creek. I believe now that the beavers have  
 21 returned to Upper Burro Creek, you will have a hard  
 22 time finding water, except in very limited pools.  
 23 As for the desert tortoise habitat,  
 24 being an outdoorsman and traveling the washes,  
 25 roads, and trails, I don't see how -- where the

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1 from us as people. The reason I say that is, if  
 2 you cut it off to a vehicle, when are you going to  
 3 cut it off when we can't go in there at all? Are  
 4 you going to tell us you can't walk in there  
 5 anymore, you can fly over it? Are you going to  
 6 take the plane away from us too? I'd just like to  
 7 see it settled down and be a multiple-use area so  
 8 we can mine it, we can live it, and enjoy it.  
 9 MS. MARQUIS: Thank you.  
 10 A SPEAKER: I have been here four  
 11 years. I work out on a tailing maintenance crew.  
 12 Our crew's primary work is right there in the  
 13 desert tortoise habitat, whatever you want to call  
 14 it. There are between nine or ten members on our  
 15 crew. Between us we got 75, 80 mining years  
 16 experience. Between all of us, all the experience  
 17 we have in the area, we have seen one tortoise.  
 18 Between all of us in all that time. I don't know  
 19 where you guys think all these tortoises are. We  
 20 are out there constantly. We don't see them. You  
 21 say all these roads in washes and everything are  
 22 going to be left open for access. I'd like you to  
 23 tell me how long do you think those roads are going  
 24 to be accessible.  
 25 MS. MARQUIS: Any other comments?

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1 MR. MILLS: Wayne Mills. My main  
 2 concern is my job. I don't really want to lose it  
 3 to a bunch of turtles, and I have been in that area  
 4 a lot. I haven't seen any more turtles there than  
 5 anywhere else. I also work in the mill. I know  
 6 how we take care of our water spillage and stuff.  
 7 I know there is no chance of hurting the turtles.  
 8 I can drink the water. If it ever came out, I  
 9 would be willing to come out and drink the water  
 10 any time because I don't think it hurts them. I  
 11 don't know where this idea came up from. It looks  
 12 like someone who just wants to do something against  
 13 mining and that's the only thing I can justify of  
 14 the whole deal, so I think it's cutting off the  
 15 public land basically to the public and taking away  
 16 our jobs. That's all I have.

17 MR. RANKA: Mario Ranka (phonetic).  
 18 From my experience in Idaho as an area of  
 19 wilderness. I worked for the Forest Service there  
 20 after wilderness came into effect. I also worked  
 21 for the Forest Service. It affected how -- what  
 22 machine we could use. We could not use a chain  
 23 saw. Many of the people, mostly workers that I  
 24 talked to did not like the law or the ways we had  
 25 to work after the law came into effect. When it

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1 per square acre?

2 MS. MARQUIS: It varies. The different  
 3 category -- the categories that are identified in  
 4 the plan indicate areas that do support --  
 5 currently support tortoise. Based on the number of  
 6 tortoise, they run transects and the number of  
 7 tortoise per square mile plus the health of the  
 8 vigor of the habitat plus management capability by  
 9 BLM, whether we have total acreage or it's very  
 10 checkerboard will indicate whether it's a Category  
 11 I, II, or III. Category I is usually where BLM has  
 12 a solid land pattern, so we have manageability of  
 13 the area, high numbers of tortoise and good  
 14 habitat.

15 Category II is usually an indicator of  
 16 two things; one, lower number in tortoise and/or  
 17 very checkerboard about land pattern with state or  
 18 private.

19 And Category III is usually a low number  
 20 of tortoise. We are primarily concerned or  
 21 focusing our efforts on the Category I habitat.  
 22 Mainly because we have greater manageability in the  
 23 area, and two, if we can sustain Category I where  
 24 there is a large enough population genetically,  
 25 there is a good pool, there is something good going

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1 came time to fire fighting, it made it difficult.  
 2 You could hardly lay in the helicopter near the  
 3 fire fighting because of this law, wilderness. I  
 4 support all the statements that have been made.  
 5 Thank you.

6 MS. MARQUIS: Thank you.

7 MR. WHITE: My name is Bob White, and I  
 8 haven't lived here quite as long as these other  
 9 fine people. I have been here 10 years, and unlike  
 10 a lot of them, I have seen desert tortoises. As a  
 11 matter of fact, for ten years every summer I have  
 12 seen the same one in my backyard. It doesn't seem  
 13 to appear to be in any danger. I have heard a lot  
 14 of talk here tonight about endangered species and  
 15 endangered habitat.

16 I'd like to make one observation and  
 17 that is I think the real endangered species and  
 18 endangered habitat is the Arizona miner and miners  
 19 of the United States and the endangered habitat is  
 20 the places we work and live. I would just  
 21 respectfully like to ask if this wilderness area or  
 22 environmental area and environmental concerns is  
 23 not as you said. Thank you.

24 MS. MARQUIS: Thank you.

25 A SPEAKER: How many turtles are there

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1 on there, we can study that even further to improve  
 2 that area.

3 A SPEAKER: Do you have any specifics of  
 4 how many turtles you tagged?

5 MS. MARQUIS: In our office, in our  
 6 files.

7 A SPEAKER: Is it possible there is more  
 8 people than we have?

9 MS. MARQUIS: It could be possible, yes.  
 10 Yes, ma'am?

11 A SPEAKER: With the designation, what  
 12 does that tell you more that you get to do that you  
 13 can't do now?

14 MS. MARQUIS: Let me just -- are we done  
 15 with statements? Are we into the formal question  
 16 and answer? Don't forget that question.  
 17 Yes, sir. You want to make a  
 18 statement?

19 A SPEAKER: I first came here in 1945,  
 20 and like some of these other people, I don't think  
 21 this is a heavily populated area for tortoises,  
 22 however, you can correct me if I'm wrong, I think  
 23 tortoises have been around longer than human  
 24 beings. They're going to be here a lot longer than  
 25 we are. They have learned how to survive.

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1 MS. MARQUIS: Any other statement before  
 2 we go to question and answer?  
 3 MR. LEWIS: Could I make a brief  
 4 statement, another one? Just in response to this  
 5 other question. Let me get this on file here.  
 6 The data that I have looked at available  
 7 from Kingman give us a relative number of tortoise  
 8 in this Category II area.  
 9 From my review today, it appears to be  
 10 four transects. It represents the three-mile  
 11 transect and transects the meandering or straight  
 12 line over the ground. I don't know the numbers. .  
 13 There is another transect in here. There were two  
 14 tortoise. There is another transect, and these are  
 15 in the premium part of town, south part of Bagdad.  
 16 No tortoise. The only other transect in this  
 17 immediate area is till you get down here in the  
 18 transect by this line, because this is where the  
 19 State line ends, and the BLM control line begins  
 20 this area right here. There are no live tortoise  
 21 in 28. I think that will clarify that.  
 22 MS. MARQUIS: Based on not only  
 23 transects but sightings that are reported to us are  
 24 also included in our -- in this data and they're  
 25 all mapped. I don't know if you got a chance to

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1 Are we in the question-and-answer  
 2 period?  
 3 MR. GILL: My name is Denton Gill, and I  
 4 received this in the mail from BLM upon request. I  
 5 requested it. And the reason why I did was I was  
 6 firstly concerned about the wilderness area that  
 7 got passed.  
 8 Well, in my opinion, the wilderness area  
 9 was a rope. Now we got the noose. And the more I  
 10 look at it, the more it's getting taken away. We  
 11 got no place to run. We have to fight, stand up  
 12 for it and keep them out. In this book -- I can't  
 13 find it at the moment -- but it has people who help  
 14 out and support and go out where you get your  
 15 information. There is not a single area in the  
 16 book from the people of Bagdad. It's Phoenix.  
 17 It's Kingman is where they're coming from. They  
 18 got no idea what is up here. There was no concern  
 19 before all this started. The land was in better  
 20 condition before everybody else started coming up.  
 21 The people in Bagdad took care of the property.  
 22 That's all. Thank you.  
 23 MS. MARQUIS: Thank you. Any more  
 24 statements? Okay. I guess we can officially close  
 25 this formal portion, and I will open it up to any

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1 see that, Scott, or not or just the transects.  
 2 MR. LEWIS: What I looked at was -- it  
 3 was a composite map Betty Berge did, plus it had  
 4 large circular areas. I got it. I have that with  
 5 me, if anybody wants to see it.  
 6 MS. MARQUIS: We have -- and I don't  
 7 know why you didn't see that, but we do have a map  
 8 indicating all sightings, live, dead, hit,  
 9 sightings by ranchers, by our staff or people out  
 10 there who call us and tell us they have seen them  
 11 and we record that on a map also.  
 12 A SPEAKER: What are you talking about?  
 13 MS. MARQUIS: Sightings of tortoise  
 14 that's on a map, whether it's by our folks, our  
 15 ranchers, people just out there who report to us  
 16 that they have seen tortoises in the area. We  
 17 record all sightings.  
 18 A SPEAKER: Do you think there is a lot  
 19 more tortoise than what is recorded?  
 20 MS. MARQUIS: It depends. It depends.  
 21 In some areas, yes. In other areas, I think we are  
 22 pretty secure. We have plots in the resource area  
 23 where we have done extensive, extensive, just  
 24 transects one after the other, and we have pretty  
 25 good data there.

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1 questions.  
 2 (Whereupon, the proceedings were  
 3 concluded at 8:50 p.m.)  
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1 STATE OF ARIZONA )  
 2 COUNTY OF MARICOPA ) ss.  
 3 CERTIFICATE

4 BE IT KNOWN that the foregoing  
 5 proceedings were taken before me, Sonia Y. Felix, a  
 6 Notary Public in and for the County of Maricopa,  
 7 State of Arizona; that the proceedings were taken  
 8 down by me in shorthand and thereafter transcribed  
 9 by a computer under my direction; that the  
 10 foregoing 68 pages are a true and correct  
 11 transcript of all proceedings, all done to the best  
 12 of my skill and ability.

13 I further certify that I am in no way  
 14 related to nor employed by any of the parties  
 15 hereto nor am I in any way interested in the  
 16 outcome hereof.

17  
 18 Dated at Phoenix, Arizona, this 5<sup>th</sup> day  
 19 of February, 1991.  
 20  
 21  
 22 *Sonia Y. Felix*  
 23 SONIA Y. FELIX  
 24 Notary Public  
 25 My Commission Expires:  
 April 24, 1992

SOUTHWEST REPORTING



**D**

**ORIGINAL**

BUREAU OF LAND MANAGEMENT HEARING

TAKEN ON TUESDAY, MARCH 5, 1991

AT 2475 BEVERLY AVENUE  
KINGMAN, ARIZONA

AT 9:05 A.M.

REPORTED BY: JANICE MINER, COURT REPORTER

*Associated Reporting of Mohave County*  
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MR. KELLIS: THE ADVISORY BOARD WILL COME TO ORDER. THE FIRST THING WE WOULD LIKE TO DO IS FOR EACH PERSON TO INTRODUCE THEIRSELVES, SO LET'S START RIGHT ON THE FRONT ROW WITH DAN.

MR. MEAD: GOOD MORNING. DANIEL MEAD, BYNER CATTLE COMPANY, BAGDAD, ARIZONA.

MR. NEAL: JOHN NEAL, JOHN NEAL RANCH.

MR. WILSON: BOB WILSON. I'M WITH THE ARIZONA FARM BUREAU.

MR. WILSON: JACK WILSON REPRESENTING THE BAR "S" RANCH.

MR. NEELY: CHUCK NEELY, CAME SPRINGS RANCH.

MS. NIKEL: BEATRICE NIKEL. I'M WITH THE X-ONE RANCH.

MR. CAMPA: MIKE CAMPA WITH THE LAZY "YU" ON THE WALAPAI MOUNTAIN. MY PLACE IS THE SPEAR "X" RANCH OF NIGHT CREEK.

MR. HAMILTON: BILL HAMILTON, QUAIL SPRINGS RANCH.

MR. HUNT: FRANK L. HUNT, MUSIC MOUNTAIN.

MR. KNISELY: DAVE KNISELY, MOUNT TIPTON.

MR. KELLY: CHESTER KELLY, CAME SPRINGS RANCH.

MR. GROSETA: ANDY GROSETA, REPRESENTING YOLO RANCH.

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APPEARANCES:

B.L.M. AREA MANAGER: ELAINE MARQUIS

PHOENIX DISTRICT MANAGER: HENRY BISSON

ADVISORY BOARD MEMBERS: ED KELLIS  
FRANK STEPHENS  
MIKE GROSS  
JOHN NEAL  
FRANK HUNT

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MR. MENGES: JEFF MENGES, VICE-PRESIDENT OF THE B.L.M. PUBLIC LANDS COMMITTEE OF THE ARIZONA CATTLE GROWERS.

MR. LANE: DOC LANE WITH THE ARIZONA CATTLE GROWERS.

MR. MC REYNOLDS: KEN MC REYNOLDS, COFER RANCH AND MOHAVE COUNTY CATTLE GROWERS.

MR. BOLES: PAT BOLES, STATE LAND DEPARTMENT.

MR. BLANTON: MIKE BLANTON, RANGE CONSERVATIONIST, B.L.M. HERE IN KINGMAN.

MR. DRENNEN: GRANT DRENNEN, RANGE CONSERVATIONIST WITH B.L.M., KINGMAN.

MR. JUDD: JESS JUDD WITH THE B.L.M. HERE IN KINGMAN.

MR. QUERTA: JOEL QUERTA WITH THE HUALAPAI TRIBE.

MR. ELEFRITZ: SCOTT ELEFRITZ. I'M A RANGE CONSERVATIONIST HERE IN KINGMAN.

MR. CALLOWAY: HERB CALLOWAY. I'M ALSO A RANGE CONSERVATIONIST HERE IN KINGMAN.

MR. GRISHAN: KELLY GRISHAN, B.L.M., KINGMAN.

MR. HUNT: FRANK HUNT, B.L.M. ADVISORY BOARD.

MR. NEAL: JOHN NEAL, JOHN NEAL RANCH.

MR. GROSS: MIKE GROSS, GROSS RANCH.

MR. STEPHENS: FRANK STEPHENS, ADVISORY

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BOARD.

MR. KELLIS: I'M ED KELLIS.

MR. ASBJORN: BRUCE ASBJORN, B.L.M., KINGMAN.

MS. RUSSELL: DIANE RUSSELL, B.L.M., KINGMAN.

MR. BENTLEY: GORDON BENTLEY, B.L.M., KINGMAN.

MR. BISSON: I'M HENRY BISSON. I'M THE DISTRICT MANAGER FOR THE PHOENIX DISTRICT.

MS. MARQUIS: AND I'M ELAINE MARQUIS, AREA MANAGER FOR THE KINGMAN RESOURCE AREA.

MR. KELLIS: NOW, DO YOU WANT TO INTRODUCE YOURSELF?

COURT REPORTER: DO YOU WANT ME TO?

MR. KELLIS: YEAH. SURE.

COURT REPORTER: OKAY. MY NAME IS JANICE MINER. I'M THE COURT REPORTER HERE TODAY.

MR. BISSON: GREAT.

MR. KELLIS: WE WANT TO WELCOME EVERYONE HERE; AND THE FIRST ORDER OF BUSINESS IS HENRY IS GOING TO GIVE SOME OPENING REMARKS.

HE'S GOT DOWN OPENING REMARKS, SO I GUESS THAT GIVES HIM THE RIGHT TO SAY ANYTHING HE WANTS TO.

MR. BISSON: WELL, THE OPENING REMARKS ARE GOING TO BE REAL SHORT. HERE COMES ANOTHER STRAGGLER. ART ROGERS JUST WALKED IN.

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YOU KNOW, THIS IS NOT YOUR ONLY CHANCE TO GET COMMENTS IN TO US. IF YOU'VE GOT SPECIFIC CONCERNS, WE'LL ACCEPT COMMENTS UNTIL APRIL 13TH.

WE, IN FACT, EXTENDED THE COMMENT PERIOD 30 DAYS TO GIVE EVERYBODY A CHANCE TO SPEND THE TIME WITH THE DOCUMENT THAT IT NEEDS GIVEN HOW SIGNIFICANT AND HOW IMPORTANT IT IS TO EVERYBODY.

ELAINE AND HER STAFF OR MYSELF PERSONALLY WILL BE AVAILABLE AND ARE AVAILABLE TO MEET WITH ANYBODY AND EVERYBODY THAT WANTS TO TALK ABOUT THE R.M.P.

THROUGHOUT THE COMMENT PERIOD AND EVEN AFTER WE GET THROUGH THE COMMENT PERIOD, IF--IF SOMETHING STRIKES YOU THAT YOU FORGOT ABOUT OR DIDN'T UNDERSTAND AND WANT SOME MORE CLARIFICATION, I JUST URGE YOU TO COME IN AND TALK WITH ELAINE AND TALK WITH THE STAFF. OKAY.

UNTIL THIS THING GOES FINAL, NOTHING IS SET IN CONCRETE AND EVERYTHING IS OPEN FOR DISCUSSION, AND I WANT YOU ALL TO KNOW THAT.

WHAT WE ANTICIPATE HAPPENING AND THE WAY I WOULD LIKE TO PROCEED WITH THE R.M.P. ONCE THE COMMENT PERIOD IS OVER IS I INTEND FOR ELAINE AND HER STAFF TO SIT DOWN AND GO THROUGH ALL THE COMMENTS. TO LOOK AT THEM AND TO LOOK AT THE EXISTING PREFERRED ALTERNATIVE THAT'S IN THE R.M.P. AND THEN MAKE ANY ADJUSTMENTS THAT THEY FEEL ARE APPROPRIATE BASED ON COMMENTS WE'VE RECEIVED.

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MR. KELLIS: THIS IS ART ROGERS.

MR. BISSON: WE REALLY HAVE SEVERAL PURPOSES FOR THIS MEETING TODAY, AND I'M EXTREMELY PLEASED THAT WE'RE ABLE TO HOLD THIS MEETING.

WE HAVE A COURT REPORTER HERE TODAY WHO CAN TAKE DOWN THE COMMENTS OF ANYBODY THAT WOULD LIKE TO SAY SOMETHING ABOUT THE KINGMAN R.M.P.

WHAT WE HOPE TO DO IS TO HAVE KIND OF A FORMAL OPPORTUNITY TO RECEIVE COMMENTS FROM THE BOARD IF YOU'RE PREPARED TO DO IT TODAY OR FROM ANYBODY ELSE WHO WOULD LIKE TO PROVIDE US COMMENTS, AND THEN WHAT WE WOULD DO IS CLOSE THE FORMAL PART OF THE MEETING, ED, AND OPEN IT UP TO ANY QUESTIONS ANYBODY MIGHT HAVE ABOUT ANY ASPECT OF THE R.M.P.

I WANT ALL OF YOU TO KNOW THAT WE DIDN'T COME HERE TODAY WITH CLOSED MINDS. WE HAVE OPEN MINDS. WE ARE HONESTLY HERE TO LISTEN TO YOUR CONCERNS.

THE R.M.P. THAT'S OUT RIGHT NOW IS A DRAFT DOCUMENT. IT'S NOT A FINAL. THEY ARE-- YOU KNOW, THERE ARE GOING TO BE SOME CHANGES WHEN WE GO TO THE FINAL. WE CAN ANTICIPATE THAT ALREADY BASED ON COMMENTS THAT WE'VE RECEIVED AND DISCUSSIONS I'VE HAD WITH ELAINE AND STAFF.

WE ANTICIPATE THAT THERE WILL BE SOME CHANGES IN THE R.M.P., SO THIS THING IS NOT SET IN CONCRETE. WE WILL ACCEPT ANY COMMENTS, EITHER VERBAL OR PREFERABLY WRITTEN AFTER THE MEETING.

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THEN ELAINE AND I, WE'LL SIT DOWN AND WE'LL GO THROUGH HER RECOMMENDATIONS. I WILL MAKE SOME DECISIONS AS TO WHAT THE FINAL DOCUMENT WILL LOOK LIKE. WE WILL THEN GO AND MEET WITH OUR STATE DIRECTOR, LES ROSENCRANTZ, AND GET HIS BYLAW BEFORE WE GO OUT WITH THE FINAL DOCUMENT.

WHEN WE COME OUT WITH A FINAL DOCUMENT, ALL IS NOT LOST IF YOU STILL HAVE CONCERNS WITH IT; AND FRANKLY, I ANTICIPATE THERE MAY BE SOME CONCERNS WITH SOME PARTS OF IT.

I THINK THAT WHILE WE ANTICIPATE A NUMBER OF CHANGES IN THE DOCUMENT, AS WITH ANY PLANNING DOCUMENT, IT'S NEVER PERFECT IN EVERYBODY'S EYES; AND I ANTICIPATE THERE WILL BE SOME CONCERNS WITH THE FINAL PRODUCT, BUT I SUSPECT THAT THE FINAL PRODUCT WILL COME A LOT CLOSER TO MEETING PEOPLE'S EXPECTATIONS THAN MAYBE IT DOES RIGHT NOW ON ALL SIDES.

AT THAT POINT IN TIME, YOU WILL HAVE AN OPPORTUNITY TO PROTEST AND APPEAL THE DOCUMENT TO THE DIRECTOR OF THE B.L.M.

IT GOES RIGHT OUT OF ARIZONA'S HANDS RIGHT TO THE DIRECTOR'S HANDS AND THERE WILL BE A 30-DAY PERIOD THAT YOU CAN DO THAT IN AND YOU CAN SEND-- WELL, THERE WILL BE ADDRESSES PUT OUT AND YOU CAN APPEAL AND PROTEST THIS DOCUMENT RIGHT TO THE DIRECTOR OF THE B.L.M., SO EVEN AT THAT POINT, IT'S NOT A FINAL DOCUMENT.

THE DIRECTOR IN-- MY EXPERIENCE WITH OTHER

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1 R.M.P.'S IS THE DIRECTOR WILL WORK TO TRY TO RESOLVE THE  
2 CONCERNS AND WILL TRY TO REACH SOME COMPROMISES AT THAT  
3 POINT. IF IT'S POSSIBLE, BEFORE A RESPONSE TO THE PARTICULAR  
4 PROTEST IS ISSUED, BUT THE DIRECTOR'S WORD IS FINAL.  
5 ON THESE PLANNING DOCUMENTS, THE EXPERIENCE IN THE  
6 APPEAL'S PROCESS IS THAT IN THE WAY THE REGULATIONS ARE  
7 STRUCTURED, THE DIRECTOR HAS THE FINAL SAY ON THE DOCUMENT.  
8 IT IS NOT APPEALABLE OR PROTESTABLE TO I.B.L.A. AS OTHER  
9 B.L.M. DECISIONS.  
10 I.B.L.A. WON'T DEAL WITH THIS KIND OF DOCUMENT.  
11 GOD FORBID WE SHOULD GET TO THAT POINT. IF YOUR--IF  
12 THERE'S--IF THERE'S A DISSATISFACTION WITH THE FINAL  
13 OUTCOME, THEN AT THAT POINT IN TIME, THIS KIND OF A DOCUMENT  
14 OR THE DECISIONS IN THE DOCUMENT WOULD HAVE TO GO RIGHT TO  
15 COURT.  
16 THERE'S NO INTERIM PROCESS WITHN I.B.L.A. AS YOU  
17 MIGHT BE USED TO ON GRAZING DECISIONS AND SO ON.  
18 MR. NEAL: WHAT'S I.B.L.A.?  
19 MR. BISSON: THE INTERIOR BOARD OF LAND  
20 APPEALS.  
21 USUALLY WHEN THERE'S A GRAZING DECISION, JOHN,  
22 WHEN IT GETS APPEALED, IT GOES BEFORE AN ADMINISTRATIVE LAW  
23 JUDGE, AND THEN IF THAT GETS APPEALED-- AND SOME OF YOU ARE  
24 FAMILIAR WITH IT, WE DON'T--WE USUALLY GET THINGS WORKED  
25 OUT. WE DON'T HAVE MANY DECISIONS GO THAT ROUTE, BUT ONCE

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1 R.M.P. I WOULD ASSUME EVERYBODY HAS HAD A CHANCE TO LOOK AT  
2 IT AND THINK ABOUT IT AND SO WITH THAT, I'LL--I'LL BE QUIET.  
3 MR. KELLIS: ALL RIGHT. YOU HAVE GOT ON  
4 "DISCUSSION TOPICS," ELAINE WAS SUPPOSED TO--  
5 MR. BISSON: YEAH.  
6 MR. KELLIS: --DISCUSS.  
7 DO YOU WANT TO SAY SOMETHING BEFORE WE OPEN IT UP?  
8 MS. MARQUIS: THE ONLY THING THAT I WANTED TO  
9 SAY, I THINK MOST OF YOU HAVE READ THE DOCUMENT, HAVE HAD  
10 SOME QUESTIONS, HAVE ALREADY TALKED TO US OR ATTENDED SOME  
11 OF OUR MEETINGS WHERE YOU'VE GOTTEN A SUMMARY OF THE R.M.P.,  
12 SO I DON'T WANT TO BELABOR THAT POINT HERE.  
13 HOWEVER, I DID WANT TO SAY THAT WHAT I'D LIKE TO  
14 DO IS--WE HAVE A COURT REPORTER NOW--IS GIVE EVERYONE AN  
15 OPPORTUNITY WHO WANTS TO MAKE A STATEMENT--A FORMAL  
16 STATEMENT THAT IS RECORDED, CAN DO SO AT THIS POINT; AND  
17 AFTER EVERYONE SPEAKS THAT WANTS TO SPEAK, WE CAN JUST OPEN  
18 IT UP TO QUESTIONS AND ANSWERS IF ANY OF YOU HAVE ANY  
19 QUESTIONS OR WANT TO DISCUSS ANYTHING AS PART OF THE R.M.P.;  
20 AND SO I THOUGHT WE WOULD HAVE THE TWO PORTIONS OF THE  
21 R.M.P. DISCUSSION; ONE, THE FORMAL ONE WITH THE COURT  
22 REPORTER AND THEN ANY INFORMAL QUESTIONS AND ANSWERS OR  
23 DISCUSSION PERIOD AFTER--AFTER THAT.  
24 MR. KELLIS: ALL RIGHT. THE FLOOR IS NOW  
25 OPEN FOR THE FORMAL STATEMENTS ON IT, SO ANYONE THAT WANTS

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1 IT GETS TO--TO THE ADMINISTRATIVE LAW JUDGE, IF EITHER PART  
2 IS NOT HAPPY WITH THE DECISION, THEN IT GETS APPEALED TO THE  
3 INTERIOR BOARD OF LAND APPEALS AND THEY MAKE THE FINAL  
4 DECISION ON IT.  
5 I AM VERY OPTIMISTIC THAT IN 95 TO 99 PERCENT OF  
6 THE CASES WHERE WE HAVE CONCERNS ON ALL SIDES WITH THE  
7 R.M.P. THAT WE CAN RESOLVE MOST EVERYTHING THAT PEOPLE ARE  
8 REALLY CONCERNED ABOUT. I HOPE THAT IN SOME CASES WE'RE  
9 ABLE TO REACH SOME COMPROMISES, BUT IN MOST CASES, I THINK  
10 WE CAN RESOLVE EVERYTHING.  
11 THERE'S A COUPLE OF DECISIONS IN THERE, AND I  
12 DON'T WANT TO KIND OF GET INTO THEM RIGHT NOW, BUT THERE'S A  
13 COUPLE OF DECISIONS THAT FRANKLY WE'RE GOING TO BE BACKED  
14 INTO A CORNER AND THERE MAY NOT BE ANYBODY HAPPY WITH WHAT  
15 WE COME OUT WITH, AND THERE'S JUST-- I DON'T KNOW WHAT WE  
16 CAN DO ABOUT IT AT THIS POINT.  
17 IT'S JUST SOMETHING THAT WE HAVE TO DO AND WE HAVE  
18 TO PROCEED WITH, BUT BEYOND THAT, I THINK EVERYTHING IS  
19 OPEN. EVEN THAT IS OPEN TO THE EXTENT THAT WE CAN OPEN IT  
20 AND DEAL WITH IT, SO WITH THAT, ED, WHAT I WOULD PROPOSE  
21 THAT WE DO IS PROVIDE AN OPPORTUNITY FOR THE BOARD, EITHER  
22 AS MEMBERS OR AS A GROUP, AND THE MEMBERS IN THE AUDIENCE TO  
23 PROVIDE US WITH ANY COMMENTS THEY MIGHT WANT TO MAKE ON THE  
24 R.H.P.  
25 WE'RE NOT GOING TO HAVE A PRESENTATION ON THE

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1 TO MAKE A FORMAL STATEMENT, I'M SURE THE COURT REPORTER  
2 WOULD LIKE TO HAVE YOU PREFACE IT WITH YOUR NAME.  
3 (INFORMAL DISCUSSION OF THE RECORD.)  
4 MR. MEAD: FIRST OF ALL, I'D LIKE TO THANK  
5 MR. KELLIS AND THE BOARD AND MR. BISSON AND THE B.L.M. FOR  
6 THIS OPPORTUNITY TO SPEAK HERE THIS MORNING.  
7 MY NAME IS DANIEL MEAD, MANAGER OF BYNER CATTLE  
8 COMPANY. WE OWN AND OPERATE AN ACTIVE COW/CALF CATTLE RANCH  
9 IN MOHAVE AND YAVAPAI COUNTY.  
10 I AM SPEAKING HERE THIS MORNING BECAUSE THE  
11 KINGMAN RESOURCE AREA RESOURCE MANAGEMENT PLAN AND  
12 ENVIRONMENT--ENVIRONMENTAL IMPACT STATEMENT, ALTERNATIVE 2  
13 AND 3, WILL HAVE A NEGATIVE IMPACT ON OUR OPERATION.  
14 BURRO CREEK SPLITS OUR RANCH, THE BAGDAD  
15 ALLOTMENT, IN HALF, AND ONE-THIRD OF THE RANCH IS NOW AN  
16 UPPER BURRO CREEK WILDERNESS AREA PASSED BY CONGRESS ON  
17 NOVEMBER 28, 1990.  
18 THE BAGDAD ALLOTMENT RANCH HAS BEEN AN ACTIVE  
19 CATTLE RANCH CLOSE TO 100 YEARS. PREVIOUS OWNERS AND  
20 OPERATORS HAVE ALWAYS WORKED VERY CLOSELY WITH THE B.L.M. IN  
21 THE PRESERVATION OF ITS NATURAL RESOURCES, ITS ENVIRONMENTAL  
22 CONCERNS, AND ALWAYS KEPT IT OPEN TO MULTIPLE USE.  
23 BEGINNING IN THE EARLY 1970'S, THE OWNERS AND  
24 OPERATORS OF THE RANCH TOOK A PROACTIVE ATTITUDE IN  
25 ESTABLISHING A NUMBER OF WINDMILLS, EARTHEN TANKS, DRINKER'S

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1 AND SALT LICKS TO ENCOURAGE UNIFORM LIVESTOCK DISTRIBUTION  
 2 AND TO ENSURE PROPER UTILIZATION OF THE BURRO CREEK RIPARIAN  
 3 AREA.  
 4  
 5 THE PLAN FOR LIVESTOCK GRAZING THROUGH THESE YEARS  
 6 OF THE '70'S AND '80'S WAS TO ALWAYS STOCK LIGHTLY, NEVER TO  
 7 OVERSTOCK OR TAKE UNFAIR ADVANTAGE OR TO ENCOURAGE HEAVY  
 8 GRAZING WHEN YEARS OF GOOD VEGETATION AND WATER WERE  
 9 AVAILABLE. THE TREND FROM THE '70'S AND '80'S HAS NOT BEEN  
 10 STOPPED BUT INTENSIFIED.  
 11  
 12 IN 1987 BYNER WITH THE B.L.M. DEVELOPED ADDITIONAL  
 13 WATERS TO ENCOURAGE GRAZING AWAY FROM BURRO CREEK. BYNER IN  
 14 ESTABLISHING THE NEW WATERS HAS INSTALLED SOLAR WATER  
 15 PUMPING UNITS INSTEAD OF THE TRADITIONAL WINDMILLS.  
 16  
 17 THE LOW PROFILE OF THE SOLAR UNITS MAKES IT BLEND  
 18 WITH THE ENVIRONMENT. IT'S VERY EFFICIENT, WHICH STIMULATES  
 19 WATER CONSERVATION PUMPING ONLY DURING DAYLIGHT HOURS AND IS  
 20 VIRTUALLY NOISELESS.  
 21  
 22 MODERN TECHNOLOGY IS NOT CHEAP. THE COST TO BYNER  
 23 OVER THE LAST TWO YEARS HAS BEEN IN EXCESS OF \$25,000 FOR  
 24 DRILLING AND INSTALLATION. THE MONEY SPENT ON THE RANCH  
 25 FROM THE 1970'S TO DATE WITH THE EXCEPTION OF \$1,200 HAS  
 BEEN OUT-OF-POCKET BY THE OWNER/OPERATOR OF THE RANCH MANY,  
 MANY THOUSANDS OF DOLLARS.  
 THE PRACTICES AND ATTITUDES MENTIONED SO FAR, AND  
 I'D LIKE TO RESTATE THIS. THE PRACTICES AND ATTITUDES

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1 COULD START FROM. WHY WEREN'T WE CONTACTED AFTER THE B.L.M.  
 2 REVIEWED OUR MATERIAL?  
 3  
 4 WHEN WE LEFT THE B.L.M. ON JANUARY 25, 1990 TO  
 5 TODAY'S DATE, NO FURTHER VERBAL DISCUSSIONS EVER OCCURRED.  
 6 BYNER MADE SEVERAL CONTACTS WITH THE B.L.M. TO SEE WHAT WAS  
 7 GOING ON, BUT WERE PUT OFF. IS THAT OUR INPUT WAS NOT  
 8 NEEDED?  
 9  
 10 BYNER TODAY WISHES TO EXPRESS DEEP CONCERN FOR THE  
 11 UNASSESSED IMPACT ON RANCHERS BY THE HIGHLY RESTRICTIVE  
 12 MANAGEMENT PROPOSED FOR THE A.C.E.C., WILD AND SCENIC RIVERS  
 13 AND CATEGORIES 1, 2 AND 3 TORTOISE MANAGEMENT AREAS.  
 14  
 15 ELIMINATION OF GRAZING AND VEHICULAR ACCESS TO  
 16 WELLS, SPRINGS AND RANGE IMPROVEMENTS WOULD--WOULD PUT NOT  
 17 ONLY BYNER BUT MANY RANCHERS OUT OF BUSINESS.  
 18  
 19 TORTOISE HABITAT IS EXTREMELY WIDESPREAD  
 20 THROUGHOUT ABOUT 60 PERCENT OF ARIZONA AND THERE IS NO VALID  
 21 SCIENTIFIC DATA INDICATING THAT THE SONORAN DESERT TORTOISE  
 22 IS THREATENED OR ENDANGERED.  
 23  
 24 TORTOISE CATEGORIES OF 1, 2 AND 3 HAVE BEEN MADE  
 25 IN THE KINGMAN RESOURCE AREA CONSISTING OF SOME 50,000  
 ACRES. HOW CAN ANY CATEGORIES BE MADE IF SCIENTIFIC DATA IS  
 NOT AVAILABLE SUPPORTING SUCH CATEGORIZATION?  
 THE CLOSING OF WASHES TO MOTOR VEHICLES WOULD  
 VIRTUALLY ELIMINATE--WOULD VIRTUALLY ELIMINATE ACCESS TO  
 IMMENSE ACREAGES OF LAND. EFFECTIVELY ESTABLISHING HUGE

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1 MENTIONED SO FAR IS WHY BURRO CREEK IS WHAT IT IS TODAY. AN  
 2 AREA OF GREAT DESIRABILITY BY ITS MANY USERS.  
 3  
 4 BYNER-- BYNER'S WILLINGNESS TO WORK WITH B.L.M.  
 5 IS ALSO ORCHESTRATED IN OTHER FORMS. WE HAVE HAD EXTENSIVE  
 6 LAND SWAPS, OVER 3,400 ACRES TRADED TO THE B.L.M. TO ALLOW  
 7 FOR BETTER MANAGEMENT OF THEIR LAND AND TO CONTROL AREAS  
 8 THAT ARE SENSITIVE.  
 9  
 10 EXAMPLE: SIX-MILE CROSSING ON THE BURRO CREEK FOR  
 11 RECREATION AND CAMPING; THE CARROW RANCH, HISTORICAL SITE IN  
 12 WIRIEUP ON THE BIG SANDY RIVER, IN WHICH WE TRADED LAND AND  
 13 GAVE HISTORICAL BUILDINGS FOR PRESERVATION.  
 14  
 15 BYNER WITHDREW FROM GRAZING ON THE BAGDAD  
 16 ALLOTMENT, OVER 640 ACRES, FOR THE PRESERVATION OF THE  
 17 ENDANGERED ARIZONA CLIFFROSE PLANT. AN ENCLOSURE WAS BUILT  
 18 AROUND THE ACREAGE AND LIVESTOCK AND BURROS ARE NOW KEPT  
 19 FROM ENTERING THE AREA.  
 20  
 21 ON DECEMBER 1, 1989, BYNER LISTENED TO THE  
 22 PROPOSAL FOR AN A.C.E.C. IN THE BURRO CREEK REGION. NO  
 23 MENTION OF WILD AND SCENIC RIVERS, NO MENTION OF TORTOISE  
 24 DESIGNATION 1, 2 AND 3.  
 25  
 26 WE WERE ASKED BY THE B.L.M. TO HAVE INPUT INTO THE  
 A.C.E.C. DESIGNATIONS ON BURRO CREEK. WE DID SO IN PERSON  
 AND IN WRITING ON JANUARY 25TH, 1990 OBJECTING TO THE TOTAL  
 ACREAGE A.C.E.C. CONCEPT AND PRESENTING SITE SPECIFIC.  
 IT WAS A POINT OF WHICH WE, THE B.L.M. AND BYNER,

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1 WILDERNESS IN THE KINGMAN RESOURCE AND THE BURRO CREEK AREA  
 2 WITH BAGDAD ALLOTMENT WOULD JOIN NOW TO THE NORTH THE UPPER  
 3 BURRO CREEK WILDERNESS AREA AND LANDS THAT WERE DESIGNATED  
 4 FOR MULTIPLE USE BY CONGRESS ON NOVEMBER 28, 1990.  
 5  
 6 ON NOVEMBER 28, 1990, CONGRESS SIGNED A WILDERNESS  
 7 BILL DESIGNATING CERTAIN LANDS IN ARIZONA FOR WILDERNESS.  
 8 CONGRESS ALSO MANDATED ON THAT DATE THAT ALL THE W.S.A.'S  
 9 THAT DID NOT MAKE WILDERNESS BE RETURNED TO MULTIPLE USE.  
 10  
 11 HOW CAN THE B.L.M. NOW INTRODUCE MANAGEMENT PLANS  
 12 THAT RESTRICT, DICTATE, AND ISOLATE LANDS FROM ALL MULTIPLE  
 13 USERS? DID CONGRESS SAY TO MANAGE FOR SPECIALIZED GROUPS  
 14 AND CONCERNS OR FOR ALL PEOPLE TO USE THE LAND ACCORDINGLY?  
 15  
 16 ON PAGE 1 OF THE K.R.A./R.M.P./E.I.S., THE LAST  
 17 PARAGRAPH, LEFT-HAND COLUMN STATES: "THE R.M.P. DOES NOT  
 18 ADDRESS LIVESTOCK GRAZING," BECAUSE THE R.M.P. FAILS TO  
 19 ADDRESS THE IMPACT ON RANCHING, ONE OF THE KINGMAN  
 20 RESOURCES--KINGMAN AREA RESOURCE'S MOST IMPORTANT INDUSTRIES  
 21 IN THE KINGMAN AREA, ALTERNATIVES 2 AND 3 ARE TOTALLY  
 22 UNACCEPTABLE.  
 23  
 24 ALTERNATIVE 1, WITH REASONABLE MODIFICATIONS, IS  
 25 THE ONLY SUPPORTABLE ALTERNATIVE; AND THERE AGAIN, IT  
 REQUIRES EVERYONE'S INPUT.  
 THANK YOU.  
 MR. KELLIS: ARE YOU GOING TO PUT THAT--GIVE  
 THAT IN WRITING. TOO, DAH?

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1 MR. MEAD: YES, SIR, I AM, BEFORE THE 15TH OR  
 2 THE 13TH.  
 3 MR. KELLIS: I KNEW THEY WERE GOING TO ASK  
 4 THAT IN JUST A MINUTE.  
 5 MR. MEAD: YES, SIR, I AM.  
 6 MR. KELLIS: ANYONE ELSE? THANK YOU.  
 7 (INFORMAL DISCUSSION OFF THE RECORD.)  
 8 MR. MENGES: I'M JEFF MENGES. I'M  
 9 VICE-CHAIRMAN OF THE PUBLIC LANDS COMMITTEE FOR THE ARIZONA  
 10 CATTLE GROWERS ASSOCIATION. I'D LIKE TO JUST MAKE A COUPLE  
 11 OF BRIEF COMMENTS ON BEHALF OF THE CATTLE GROWERS  
 12 WHILE--WHILE WE'RE HERE.  
 13 FIRST OF ALL, WE'D LIKE TO SAY THAT WE--WE  
 14 STRONGLY SUPPORT THE IMPLEMENTATION OF THE LIVESTOCK GRAZING  
 15 E.I.S. INTO THE RESOURCE MANAGEMENT PLAN AND HOP: THAT'LL  
 16 BECOME PART OF THE FINAL DOCUMENT.  
 17 WE-- I ASSUME THAT THAT DOCUMENT'S BEEN UPDATED  
 18 ON A REGULAR BASIS AND IS BEING KEPT CURRENT SINCE IT  
 19 ORIGINALLY WAS DRAFTED.  
 20 MR. BISSON: WE--WE CAN TALK ABOUT THAT  
 21 AFTER--  
 22 MR. MENGES: OKAY.  
 23 MR. BISSON: --AFTER THE FORMAL PART.  
 24 MR. MENGES: OKAY. ASSUMING--  
 25 MR. BISSON: IT'S--

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1 ARE OPPOSED TO THE OFF-VEHICULAR RECREATIONAL AREA. THAT'S  
 2 BEEN DESIGNATED AT THE RED LAKES AREA, SO OUR LETTER OF THE  
 3 14TH--FEBRUARY THE 14TH STATES THAT VERY CLEARLY.  
 4 MR. KNISELY: GOOD MORNING, MY NAME IS DAVE  
 5 KNISELY, MOUNT TIPTON RANCH; AND I'D LIKE IT TO BE KNOWN  
 6 THAT I'M OPPOSED TO THE ENLARGEMENT OF H.M.A. IN THAT AREA.  
 7 THANK YOU.  
 8 MR. KELLIS: ANYONE ELSE? WHAT ABOUT THE  
 9 MEMBERS OF THE ADVISORY BOARD? DO THEY WANT TO MAKE A  
 10 FORMAL STATEMENT OR ANYTHING ON IT?  
 11 MR. HUNT: I DON'T AT THIS TIME.  
 12 MR. NEAL: I DO.  
 13 MR. KELLIS: OKAY.  
 14 MR. NEAL: MY NAME IS JOHN NEAL, AND I WANT  
 15 TO MAKE IT CLEAR THAT--AND I GUESS MAYBE WE--WE COULD HAVE A  
 16 VOTE, BUT THE ADVISORY BOARD IS OPPOSED TO THIS DOCUMENT,  
 17 THE A.M. RANGE--RANGE MANAGEMENT PLAN. WHAT DO YOU CALL IT?  
 18 MR. BISSON: RESOURCE MANAGEMENT PLAN.  
 19 MR. NEAL: RESOURCE MANAGEMENT PLAN, AND I  
 20 WOULD LIKE TO ALSO MAKE YOU KNOW THIS-- I GUESS I COULD  
 21 WAIT AND DO IT LATER, BUT I'M GOING TO GO AHEAD AND ASK IT  
 22 NOW.  
 23 IS-- SHOULDN'T THIS DOCUMENT ANSWER THE QUESTION  
 24 THAT--THAT THE ORGANIC ACT HAS PLACED ON ALL OF US TO NOT  
 25 HAVE ANY RANGE MANAGEMENT PLANS WITHOUT COOPERATION AND

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1 MR. MENGES: ASSUMING THAT THAT'S BEEN DONE,  
 2 WELL, WE STRONGLY SUPPORT THE IMPLEMENTATION OF THAT INTO  
 3 THE--INTO THE R.M.P., BUT BECAUSE OF THE-- WE'VE BRIEFLY  
 4 LOOKED THROUGH THE DRAFT R.M.P. AND BECAUSE OF THE LENGTH  
 5 AND THE COMPLEXITY OF THE--THE DOCUMENT, WE WILL BE  
 6 REQUESTING IN WRITING FROM THE KINGMAN RESOURCE AREA THAT  
 7 THE B.L.M.--A SUMMARY--A SUMMARY FROM THE B.L.M. OF ANY  
 8 CHANGES THAT ARE GOING TO OCCUR WITH REGARDS TO GRAZING ON  
 9 THE AREA IF--IF THE--IF THE DRAFT--THE PROPOSAL OF THE DRAFT  
 10 WERE IMPLEMENTED. SO THAT'S ALL I HAVE.  
 11 MR. KELLIS: ANYONE ELSE IN THE AUDIENCE WANT  
 12 TO MAKE A FORMAL STATEMENT?  
 13 MR. MC REYNOLDS: KEN MC REYNOLDS, COFER  
 14 RANCH. ON THE DESERT TORTOISE CATEGORY 3, TOWNSHIP 20,  
 15 RANGE 13 WEST AND TOWNSHIP 19 NORTH, RANGE 13 WEST. THESE  
 16 AREAS ARE STATE AND PRIVATE LANDS AND WERE INCLUDED IN THE  
 17 DESERT TORTOISE CATEGORY, AND WE WOULD SURELY HOPE THAT THEY  
 18 COULD BE REMOVED FROM THE CLASSIFICATION.  
 19 THANK YOU.  
 20 MR. KELLIS: NEXT.  
 21 MR. NEELY: MY NAME IS CHUCK NEELY WITH THE  
 22 CANE SPRINGS RANCH. DN FEBRUARY 14TH, I SENT A LETTER TO  
 23 MR. CARTER STATING OUR CONCERNS WITH THE DRAFT THAT WAS SENT  
 24 TO US.  
 25 FOR THE RECORD, I WOULD LIKE TO REITERATE THAT WE

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1 COORDINATION AND CONSULTATION?  
 2 ALSO, I WOULD LIKE FOR EVERYONE TO LOOK AT THE MAP  
 3 THAT WE HAVE THAT SHOWS THE PRIVATE LAND AND I DON'T KNOW  
 4 HOW MANY ALLOTMENTS THERE ARE ON THERE, ELAINE, ABOUT  
 5 PROBABLY 90, 80, OR HOW MANY?  
 6 MR. ASBJORN: EIGHTY.  
 7 MR. NEAL: ABOUT 80. WE WANT TO MAKE A  
 8 FORMAL REQUEST, AND WE'RE VERY CONCERNED ABOUT THE NAME  
 9 THAT'S GIVEN TO THESE ALLOTMENTS, THESE B.L.M. ALLOTMENTS;  
 10 AND WE WOULD LIKE TO REQUEST B.L.M. TO CHANGE THAT AND IF  
 11 THEY--THEY-- I AM SURE THEY HAVE SOME B.L.M. ALLOTMENTS.  
 12 BUT IF THEY'RE NOT ALL B.L.M. ALLOTMENTS, THEN THEY SHOULD  
 13 BE NAMED AND ALL THE LITERATURE THAT GOES OUT TO DIFFERENT  
 14 PEOPLE SHOULD SAY INTERMINGLED ALLOTMENTS WITH PRIVATE AND  
 15 B.L.M.; AND WE SHOULD USE OUR BASE PROPERTY RIGHT, WHICH IS  
 16 THE WATERS AND THE IMPROVEMENTS, AS A PART OF THAT ALLOTMENT  
 17 BECAUSE IT'S REAL MISLEADING TO PEOPLE ALL OVER THE COUNTRY  
 18 WHEN THEY TALK ABOUT A B.L.M. ALLOTMENT.  
 19 OR THEY'LL SAY, "WELL THIS ALLOTMENT IS 70 PERCENT  
 20 B.L.M." WELL, THAT DOESN'T CONSIDER ALL THE PRIVATE RIGHTS,  
 21 THE BASE PROPERTY RIGHTS, THE WATER AND THE IMPROVEMENTS;  
 22 AND I THINK THAT REALLY NEEDS TO BE CLARIFIED AND MAY HELP  
 23 US A LOT IN THE FUTURE TO KEEP DOWN PROBLEMS.  
 24 MR. KELLIS: WAIT--WAIT JUST A MINUTE. I'LL  
 25 GET BACK TO YOU IN JUST A MINUTE, ART.

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1 MIKE, DO YOU WANT TO SAY--MAKE A STATEMENT?  
 2 MR. GROSS: I WANT TO MAKE A LITTLE STATEMENT  
 3 TO THE GRAZING SITUATION. I GOT A LITTLE DEAL HERE. I HAVE  
 4 BEEN TO A LOT OF MEETINGS SITTING AROUND AND LISTENING AND  
 5 EVERYTHING AND I BELONG TO THE ARIZONA BRANCH OF THE CENTER  
 6 FOR HOLISTIC RESOURCE MANAGEMENT.  
 7 I WANT TO READ A LITTLE DEAL HERE AND I THINK IT'S  
 8 PRETTY IMPORTANT. AND THIS HAPPENS TO BE RUKIN JELKS.  
 9 THEY'RE TALKING ABOUT RUKIN JELKS' PLACE AND I WANT TO READ  
 10 THIS; AND THEN I WANT TO GO ON AND, YOU KNOW, THEN I'M GOING  
 11 TO LEAD OFF INTO THIS.  
 12 "WELL, THE RAINS CAME. A FEW PEOPLE ADMITTED THEY  
 13 WERE BEGINNING TO LOSE HOPE FOR A WHILE. BUT HERE IS A  
 14 LESSON WORTH LEARNING. A RANCHER FROM THIS AREA, WHO WOULD  
 15 PREFER TO REMAIN ANONYMOUS, BUT WHO ACTUALLY IS YOUR STATE  
 16 BRANCH PRESIDENT, RUKIN JELKS THE THIRD, HAD REALLY MOVED  
 17 INTO HIGH GEAR WITH ANIMAL IMPACT LAST YEAR.  
 18 "WITH HERD CONSOLIDATION, WE WERE FINALLY GETTING  
 19 TO SEE SOME SOIL DISTRIBUTION AND RESULTS. HOWEVER, AS TIME  
 20 WENT ON AND NO MOISTURE FELL, MOST OF THE RANCHING INDUSTRY  
 21 WAS WEARING LONG FACES, TIGHTENING BELTS AND SELLING OFF  
 22 EXCESS STOCK; NOT RUKIN.  
 23 "IT'S GOING TO RAIN SOMEDAY," HE SAID, AND "I'M  
 24 GOING TO BE READY." IT DID. HE WAS; AND THE RESULT WAS  
 25 VIRTUALLY NO RUNOFF.

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1 IN GRAZING IN THESE AREAS, BUT IT'S GOT TO BE WITH  
 2 MANAGEMENT PLANS.  
 3 I HAVE A SYSTEM AND IT'S WORKING OUT REAL WELL.  
 4 WHEN I STARTED THIS-- WHEN MY FAMILY STARTED THIS, WE  
 5 HAVEN'T HAD A DECENT RAIN SINCE WE STARTED THIS.  
 6 WE HAVE BEEN IN A DROUGHT EVER SINCE I PUT THE  
 7 FIRST COW ON HOLISTIC RESOURCE MANAGEMENT. I STARTED 40  
 8 COWS AND WENT TO 60 HEAD OF COWS, AND I'M MANAGING THEM  
 9 THROUGH A DROUGHT; AND I'M STILL MANAGING THEM. THINGS ARE  
 10 LOOKIN' GOOD OUT THERE.  
 11 MY--HY COWS STAYED FAIRLY WELL AND IN GOOD  
 12 CONDITION, SO I KNOW IF--IF--IF WE JUST DO SOME MANAGEMENT,  
 13 EVERYBODY SITS DOWN AND FIGURE OUT A MANAGEMENT PLAN, EVEN  
 14 WITH THE A.C.E.C.'S, THE DESERT TORTOISE HABITAT, RIPARIAN  
 15 AREAS, AND ANY OTHER CRITICAL ENVIRONMENT, I THINK IT CAN BE  
 16 DONE. I KNOW IT CAN BE DONE.  
 17 WE HAVE TO HAVE THE ANIMAL IMPACT TO HEAL THE  
 18 LAND. THE LANDS ARE REALLY GETTING--I MEAN, JUST GOING TO  
 19 DESERT DESERTIFICATION. PLANT SPECIES ARE--WE'RE LOSING  
 20 THEM; AND WHEN WE START LOSING OUR PLANT SPECIES, WE'RE  
 21 GOING TO LOSE OUR WILDLIFE, OUR WATER CYCLE, AND ALL OF THE  
 22 OTHER THINGS, YOU KNOW, THAT GOES--GOES--GOES WITH THIS  
 23 SYSTEM.  
 24 THANK YOU.  
 25 MR. KELLIS: DID YOU WANT TO SAY ANYTHING?  
 26

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1 "BY ANYBODY'S ESTIMATION, THE RANCH LOOKS BETTER  
 2 THAN IT EVER HAS. NEARBY ALLOTMENTS WHO FOLLOWED THE  
 3 CONSERVATIVE APPROACH AND REDUCED STOCKING RATES HAD NO  
 4 MEASURE--NO MEANS TO SET UP THE SOIL SURFACE FOR RAIN AND SO  
 5 MUCH OF THE MOISTURE HAS RUN OFF."  
 6 THAT LEADS ME TO THIS PROCESS OF REDUCING NUMBERS  
 7 AND MANAGING YOUR COWS THROUGH A DROUGHT. IN THIS BOOK, IT  
 8 DON'T MENTION ALL OF YOUR A.C.E.C.'S AND RIPARIAN AREAS.  
 9 YOUR DESERT TORTOISE HABITATS AND--AND YOUR OTHER CRITICAL  
 10 ENVIRONMENT.  
 11 THIS BOOK DON'T SAY "LET'S IMPLEMENT GRAZING IN  
 12 THEM AREAS." I THINK IT'S IMPORTANT. GRAZING HAS TO BE  
 13 DONE. WE HAVE-- MOST-- SOME OF US HAVE BEEN TO THIS  
 14 SAVORY (PHONETIC) SCHOOL; AND I THINK AFTER WE COME OUT OF  
 15 IT, I'M PRETTY WELL CONVINCED WE HAVE TO HAVE GRAZING, AND I  
 16 THINK WE'VE GOT TO BE A BETTER MANAGEMENT.  
 17 WE HAVE TO HAVE MANAGEMENT PLANS. WE CAN GRAZE IN  
 18 THESE DESERT TORTOISE AREAS. WE CAN GRAZE IN THESE  
 19 ENVIRONMENT--I MEAN, THESE A.C.E.C.'S RIPARIAN AREAS.  
 20 WE--WE--WE HAVE TO BE ABLE--TO BE ABLE TO GET THE PLANT  
 21 GROWTH, THE IMPACT AND THE ECOLOGICAL SYSTEM. JUST RECENTLY  
 22 YOU GUYS GAVE AN AWARD TO THE BRIMHALLS FOR--FOR WHAT THEY  
 23 DID DOWN THERE IN THE BURRO CREEK AREA WHERE IT'S WASHED  
 24 OUT REALLY BAD AND THEY WENT IN THERE AND DID SOME  
 25 MANAGEMENT; AND I THINK WE NEED TO GET IN THIS BOOK TO PUT

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1 MR. STEPHENS: NO, NOT AT THIS TIME.  
 2 MR. KELLIS: FRANK, YOU DIDN'T HAVE ANY  
 3 STATEMENT TO MAKE?  
 4 MR. HUNT: I HAVE NONE. I HAVE A QUESTION I  
 5 WOULD LIKE TO ASK.  
 6 MR. KELLIS: WAIT JUST A MINUTE, FRANK.  
 7 LET'S GET THESE FORMAL STATEMENTS BEFORE WE START THE  
 8 QUESTIONS.  
 9 MR. HUNT: ALL RIGHT.  
 10 MR. KELLIS: ART ROGERS WANTS TO MAKE A  
 11 FORMAL STATEMENT BACK THERE.  
 12 MR. ROGERS: I'M ART ROGERS FROM THE ARRASTRA  
 13 MOUNTAIN ALLOTMENT, AND GOING THROUGH THIS DRAFT STATEMENT  
 14 PERTAINING TO THE OLD LEGAL WATER RIGHTS ON THESE RANCHES,  
 15 THAT'S BEEN THERE FOR CENTURIES, YOU MIGHT SAY, THE  
 16 IMPROVEMENTS.  
 17 TO MY UNDERSTANDING THERE IS FORESEEABLE  
 18 FORECLOSURE OF GRAZING, AND IS THERE ANY AMOUNT OF  
 19 RESTITUTION TO BE MADE TO THOSE RANCHERS THAT HAS PUT THEIR  
 20 LIFEWORX IN DEVELOPING THESE PLACES, DEVELOPING THE WATERS?  
 21 SOME OF THEM ARE NEW; SOME OF THEM ARE THE OLD  
 22 LEGAL RIGHTS GOING BACK TO 1916. I INTEND TO MAKE A WRITTEN  
 23 COMMENT ON THIS AND PRESENT IT WITHIN THIS TIME PERIOD, AND  
 24 I THANK YOU VERY MUCH.  
 25 MR. KELLIS: DO WE HAVE ANY OTHER FORMAL

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1 STATEMENTS FROM THE AUDIENCE?  
 2 MR. WILSON: OKAY. I'M BOB WILSON. I'M WITH  
 3 THE ARIZONA FARM BUREAU, AND THESE RANCHERS HERE TODAY HAVE  
 4 A NUMBER OF CONCERNS.  
 5 I HAVE NOT HAD A CHANCE TO REALLY LOOK THROUGH THE  
 6 DOCUMENT TO ASK QUESTIONS. I'LL PROBABLY BE ASKING SOME  
 7 LATER, BUT I WOULD LIKE TO SAY THAT THE 4,000 MEMBERS IN  
 8 ARIZONA AND ALMOST 4 MILLION MEMBERS NATIONWIDE ARE VERY  
 9 CONCERNED ABOUT GOVERNMENT ACTION; AND I--I JUST READ AN  
 10 EXCERPT FROM OUR POLICY: "WE BELIEVE ANY ACTION BY  
 11 GOVERNMENT THAT DIMINISHES AN OWNER'S RIGHT TO USE HIS  
 12 PROPERTY, CONSTITUTES THE TAKING OF THE OWNER'S PROPERTY  
 13 THEREFORE, THE GOVERNMENT SHOULD PROVIDE DUE PROCESS AND  
 14 COMPENSATION TO THE EXACT DEGREE THAT AN OWNER'S RIGHT TO  
 15 USE HIS PROPERTY HAS BEEN DIMINISHED BY GOVERNMENT ACTION,"  
 16 SO WE WILL BE LOOKING AT THIS VERY CLOSELY AND WE'LL  
 17 PROBABLY BE MAKING A WRITTEN COMMENT ON THE PLAN.  
 18 MR. KELLIS: ANY MORE FORMAL STATEMENTS OR  
 19 COMMENTS? HOW ABOUT YOUR PEOPLE, HENRY, ANY OF THEM WANT TO  
 20 MAKE A COMMENT?  
 21 MR. BISSON: IF THEY DO, I'LL SHOOT THEM.  
 22 MR. KELLIS: I THOUGHT MAYBE WE MIGHT DRIVE A  
 23 WEDGE HERE OR SOMETHING.  
 24 MR. BISSON: HOW ABOUT IT? DOES ANYBODY WANT  
 25 TO MAKE A FORMAL COMMENT? THIS IS YOUR ONE TIME CHANCE.

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1 SOME CONCERNS; AND I'M SURE THAT YOU'LL HAVE A LOT OF  
 2 QUESTIONS THAT YOU'LL WANT TO ASK US THAT WE CAN--IF WE  
 3 CAN'T ANSWER THEM TODAY, WE'LL DO THE BEST WE CAN TO GET YOU  
 4 ANSWERS TO THE QUESTIONS YOU HAVE.  
 5 I URGE YOU TO GET COMMENTS IN. I THINK ONE OF THE  
 6 THINGS THAT YOU NEED TO UNDERSTAND, THAT'S IMPORTANT, IS  
 7 THAT, IN FACT, WHEN WE GO TO THE FINAL, TO BE ELIGIBLE TO  
 8 PROTEST THE FINAL, YOU NEED TO HAVE SHOWN SOME PARTICIPATION  
 9 IN THE PROCESS; AND I THINK ALL OF YOU WHO SHOWED UP TODAY  
 10 AND WILL SIGN UP CAN EASILY DO THAT.  
 11 I THINK THAT IF YOU'RE A MEMBER OF THE RANCHING  
 12 COMMUNITY, CLEARLY YOU'RE A PARTICIPANT IN THE LAND USE  
 13 PLANNING PROCESS AND CAN PROTEST YOUR APPEAL AT FINAL  
 14 DOCUMENT, BUT THOSE INDIVIDUALS, WHETHER THEY'RE  
 15 ENVIRONMENTAL GROUPS OR ANYBODY ELSE, THAT COME IN AT THE  
 16 LAST MINUTE WILL BE PRECLUDED FROM PROTESTING IF THEY CAN'T  
 17 SHOW THAT THEY SOMEHOW PARTICIPATED IN THE PROCESS, SO IT'S  
 18 REAL IMPORTANT THAT YOU MAKE SURE YOU SIGN THAT SHEET TODAY;  
 19 AND AGAIN, WE TAKE YOUR CONCERNS AND COMMENTS VERY  
 20 SERIOUSLY, AND I PROMISE YOU WE'LL CONSIDER EVERYTHING THAT  
 21 WAS SAID TODAY.  
 22 OKAY. THAT'S ALL I HAD, ED.  
 23 MR. KELLIS: YOU'RE GOING TO HAVE AN  
 24 OPPORTUNITY TO DO THAT. WE'RE GOING TO OPEN UP FOR  
 25 QUESTIONS AND ANSWERS HERE IN A FEW MINUTES, BUT IT WON'T BE

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1 MR. KELLIS: HENRY WANTS YOU TO SIGN YOUR  
 2 NAME TO A SHEET JUST BEFORE YOU DO IT, BLANK, THOUGH.  
 3 (INFORMAL DISCUSSION OFF THE RECORD.)  
 4 MR. KELLIS: NOW, WE'RE--WE'RE GOING TO CLOSE  
 5 THE COURT RECORDS HERE OR THE COURT REPORTER IS GOING TO  
 6 CLOSE HER RECORDS--LET'S PUT IT THAT WAY--WITH THE FORMAL  
 7 COMMENTS; AND WE'RE GOING TO HAVE SOME QUESTIONS AND ANSWER  
 8 PERIOD, BUT THEY WON'T BE ON A FORMAL RECORD.  
 9 NOW, DOES ANYONE ELSE HAVE A FORMAL STATEMENT THAT  
 10 THEY WANT TO GET INTO THE RECORD?  
 11 JUST BE SURE AND SIGN YOUR NAME TO THE LIST THAT'S  
 12 GOING AROUND AND EVERYBODY THAT MADE A COMMENT BE SURE THAT  
 13 JANICE GETS YOUR CORRECT NAME AND WHO YOU'RE REPRESENTING TO  
 14 PUT INTO THE RECORD.  
 15 WE'LL HAVE A FIVE-MINUTE RECESS AND YOU CAN GIVE  
 16 HER THOSE NAMES.  
 17 MR. BISSON: BEFORE WE DO THAT, I WANT TO  
 18 MAKE JUST ONE CLOSING REMARK.  
 19 MR. KELLIS: GO AHEAD.  
 20 MR. BISSON: AGAIN, I WANT TO REITERATE THAT  
 21 I SINCERELY APPRECIATE YOU TAKING THE TIME TO COME AND MAKE  
 22 THESE STATEMENTS.  
 23 WE'RE VERY CONCERNED ABOUT THE THINGS YOU'VE SAID.  
 24 SOME OF THEM I HOPE WE CAN ADDRESS WHEN WE GET INTO THE  
 25 COMMENT AND ANSWER PERIOD AND MAYBE ALLEVIATE SOME FEARS AND

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1 MADE A MATTER OF RECORD.  
 2 MR. BISSON: YEAH.  
 3 MR. KELLIS: WELL, WE'LL TAKE A FIVE-MINUTE  
 4 BREAK THEN.  
 5 MR. BISSON: OKAY.  
 6 (THE TAKING OF THE HEARING WAS CONCLUDED  
 7 AT 9:46 P.M.)  
 8  
 9  
 10  
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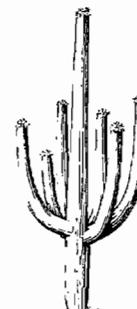
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1 CERTIFICATE OF REPORTER  
 2 STATE OF ARIZONA )  
 3 ) SS.  
 4 COUNTY OF MOHAVE )  
 5  
 6 I, JANICE MINER, COURT REPORTER, DO HEREBY CERTIFY  
 7 THAT I TOOK DOWN IN SHORTHAND (STENOTYPES) ALL OF THE  
 8 PROCEEDINGS HAD IN THE BEFORE-ENTITLED MATTER AT THE TIME  
 9 AND PLACE INDICATED, AND THAT THEREAFTER SAID SHORTHAND  
 10 NOTES WERE TRANSCRIBED INTO TYPEWRITING AT AND UNDER MY  
 11 DIRECTION AND SUPERVISION AND THE FOREGOING TRANSCRIPT  
 12 CONSTITUTES A FULL, TRUE AND ACCURATE RECORD OF THE  
 13 PROCEEDINGS HAD.  
 14 IN WITNESS WHEREOF, I HAVE HEREUNTO AFFIXED MY  
 15 HAND THIS 18TH DAY OF MARCH, 1991.  
 16  
 17 *Janice Miner*  
 18 JANICE MINER, COURT REPORTER  
 19  
 20  
 21  
 22  
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 24  
 25

*Associated Reporting of Mohave County*

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RESPONSES TO TRANSCRIPTS

C-1 See response 29-3.

C-2 The concerns expressed by the Cyprus Bagdad Copper Corporation and Byner Cattle Company in January 1990 were incorporated into changes in the Burro Creek Area of Critical Environmental Concern boundary. The boundary was moved substantially away from existing and proposed future tailing piles of the Cyprus Bagdad copper mine. The revised area of critical environmental concern boundary was shown on maps in the draft Resource Management Plan published in November 1990.

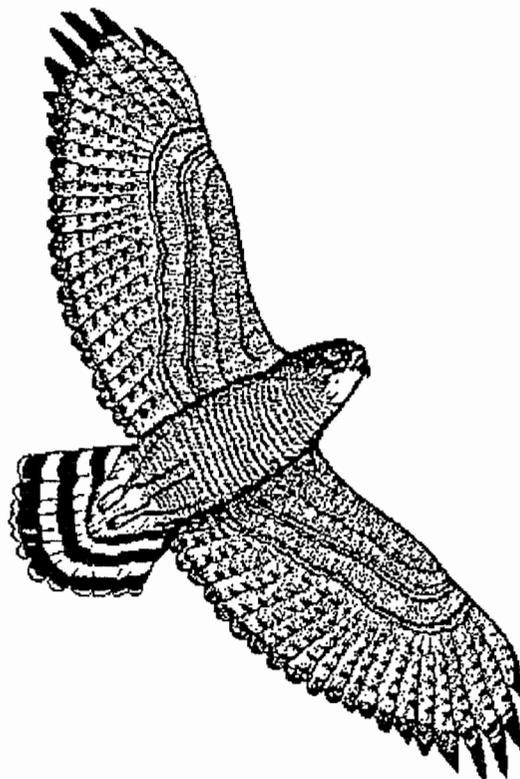
C-3 BLM technical data used in developing the alternatives are found in the Management Situation Analysis, filed in the Kingman Resource Area office and available for public review. The Management Situation Analysis incorporated applicable decisions from the management framework plans. The Management Situation Analysis is incorporated into this document by reference on page 19.

C-4 BLM Manual 1601.05C, 1620.01D and 1622.11A1 require delineation of important wildlife habitat. This is based on existing data in the Kingman Resource Area office files and outlined in the Management Situation Analysis. BLM Manual 1601.08E requires the use of available inventory data in preparing resource management plans.

C-5 The BLM is complying with specific provisions in the Wild and Scenic Rivers Act of 1968 by making eligibility determinations. The BLM does not have the option of not making these determinations.

C-6 Specific provisions in Section 202(C)(3) of the Federal Land Policy and Management Act of 1976 and Section 5(d) of the Wild and Scenic Rivers Act require classification of an area for several unique values. BLM Manual 1623.41A2d requires eligibility determinations and BLM Manual 1601.08C requires the BLM to give priority to identification, designation and protection of areas of critical environmental concern. In the case of a riparian area of critical environmental concern and a wild and scenic river, these values are compatible. The area of critical environmental concern management prescriptions include proposing to Congress that the riparian zone be withdrawn from mineral entry. The several unique values of each area will be addressed when site-specific management plans are completed.

D-1 See response C-2.



L-1



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
KINGMAN RESOURCE AREA
1475 BEVERLY AVENUE
KINGMAN, ARIZONA 86401



March 22, 1991

Sandy Naughton
Executive Vice President
Arizona Cattle Growers' Association
1401 N. 24th Street, Suite #4
Phoenix, Arizona 85008

Dear Ms. Naughton:

Thank you for your letter to Henri Bisson, Phoenix District Manager, concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). He has asked me to respond to your questions and the following information is in answer to them. We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements. This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

New AMPs will be written according to a schedule to be included in the next updated Range Program Summary (RPS), to be published within a year. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). The presence of Areas of Critical Environmental Concern (ACEC) within allotments will be an important factor in determining priorities for AMP development. Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Specific Management Prescriptions for each ACEC proposed, are shown in Appendix 18. The proposed management prescriptions for each ACEC are designed to protect and enhance important or unique values such as the Joshua tree forest, bighorn sheep, Hualapai Mexican vole, bald eagle, black-hawk, desert tortoise, riparian areas, cultural and paleontological resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices. Most Management Prescriptions in the Preferred Alternative do not exclude livestock, exceptions are the Hualapai Mountain, Carrow-Stephens, and Clay Hills ACECs.

The following are the management prescriptions for each ACEC, which apply to livestock grazing. You will note these prescriptions are in concert with the desired plant community objectives for range management, identified in the grazing EIS documents.

Joshua Tree Forest - Grand Wash Cliffs ACEC (see page 202)

Includes allotments Diamond Bar A (0029) and Gold Basin (0037).

Mgt. Presc. 16. Review current management to assure livestock grazing is in accordance with goals and objectives of the ACEC. Develop desired plant community descriptions for Joshua tree sites and include these in AMP objectives and design grazing management techniques to achieve them.

Black Mountains ACEC (see page 204)

Includes allotments Big Ranch A (0007), Black Mountain A (0010), Fort MacEwen A (0034), Cediondia (0036), Mud Springs (0056), Portland Springs (0061), Thumb Butte (0068), Big Ranch B (0081), and Fort MacEwen B (0082).

Mgt. Presc. 12. Develop desired plant community descriptions for important bighorn sheep habitat and include these in AMP and HMP (Habitat Management Plan) objectives, and design specific management actions to achieve them. Manage livestock grazing to prevent excess utilization.

Mgt. Presc. 13. Review the existing burro Herd Management Area Plan (HMAP) to ensure it conforms with goals and objectives of the ACEC. Keep burro numbers within 320 to 480.

Wright and Cottonwood Creeks Riparian and Cultural ACEC (see page 207)

Includes allotments Crozier Canyon (0026), Hackberry (0042), Truxton Canyon A (0070), and Valentine (0072).

Mgt. Presc. 13. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions for the riparian zone and design grazing management objectives and grazing systems to achieve them.

Cherokee Point Antelope Habitat ACEC (see page 207)

Includes allotment Crozier Canyon (0026).

Mgt. Presc. 8. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into the AMP. Manage pronghorn antelope habitat at its optimum potential.

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CONSULTATION AND COORDINATION

page 3

Hualapai Mountain Research Natural Area ACEC (see page 208)

Includes allotments Boriana A (0011), Hualapai Peak (0047), Hibernia Peak A (0050), La Glenega (0051), and Yellow Pine (0078).

Mgt. Presc. 10. Exclude livestock from occupied and historic vole habitat (2,114 acres). Note: Occupied sites are currently fenced to exclude grazing. Current rangeland management goals are to restore all riparian areas, which includes historical vole habitats.

Mgt. Presc. 11. Review existing allotment management plans and incorporate objectives designed to protect and enhance watersheds surrounding the ACEC. Develop desired plant community descriptions and design specific management actions to achieve them.

White-Margined Penstemon Reserve ACEC (see page 209)

Includes allotments Boriana A (0011), Happy Jack Wash (0043), and La Glenega (0051).

Mgt. Presc. 10. Develop and implement a livestock management plan to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and include these in the AMP.

Carrow-Stephens Ranches ACEC (see page 210)

Includes allotments Big Sandy (0008) and Diamond Joe (0028).

Mgt. Presc. 6. Fence the ACEC and remove it from consideration of public livestock grazing (1,107 acres). Note: The permittee is currently excluding livestock from the portion of the ACEC east of Highway 93 in order to maintain the historical character of the ranch houses. This action is voluntary, because of their interest in protecting the area, and the permittee agrees with this management prescription.

McCracken Desert Tortoise ACEC (see page 211)

Includes allotments Artillery Range (0003), Bateman Springs (0006), and Chicken Springs (0021).

Mgt. Presc. 10. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

Chicken Springs 0021  
Bateman Springs 0006  
Artillery Range 0003

Mgt. Presc. 11. Manage livestock grazing to ensure adequate and suitable perennial and ephemeral forage and cover for tortoises throughout the year, especially during the spring and late summer-fall.

Page 4

Mgt. Presc. 12. Conduct tortoise inventory, monitor habitat condition, and assess impacts of livestock grazing. Make necessary adjustments in livestock numbers and grazing season.

Note: These Management Prescriptions are consistent with BLM policy as outlined in the document - Desert Tortoise Habitat Management on the Public Lands: A Range-wide Plan and BLM Arizona State and Phoenix District Instruction Memoranda.

Poachie Desert Tortoise Habitat ACEC (see page 212)

Includes allotments Arrastra Mountain (0002), Black Mesa A (0009), Burro Creek Ranch (0014), Greenwood Community (0039), and Black Mesa B (0110).

Mgt. Presc. 10. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

Greenwood Community 0039  
Burro Creek Ranch 0014  
Arrastra Mountain 0002

Mgt. Presc. 11. Manage livestock grazing to ensure adequate and suitable perennial and ephemeral forage and cover for tortoises throughout the year, especially during the spring and late summer-fall.

Mgt. Presc. 12. Conduct tortoise inventory, monitor habitat condition, and assess impacts of livestock grazing. Make necessary adjustments in livestock numbers and grazing season.

Note: These Management Prescriptions are consistent with BLM policy as outlined in the document - Desert Tortoise Habitat Management on the Public Lands: A Range-wide Plan and BLM Arizona State and Phoenix District Instruction Memoranda.

Aubrey Peak Bighorn Sheep Habitat ACEC (see page 213)

Includes allotments Artillery Range (0003) and Planet Ranch (Lake Havasu Resource Area).

Mgt. Presc. 13. Develop desired plant community descriptions for bighorn sheep habitat and include these in AMP and HMP objectives, and design management objectives to achieve them. Manage habitat at its optimum potential for bighorn sheep.

Burro Creek Riparian and Cultural ACEC (see page 215)

Include allotments Bagdad (0005), Black Mesa A (0009), Burro Creek (0013), Burro Creek Ranch (0014), Greenwood Community (0039), Greenwood Peak Community (0040), and 7L Cattle Company (0111).

Mgt. Presc. 11. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

Bagdad 0005  
Greenwood Peak Community 0039  
Burro Creek Ranch 0014  
Artillery Range 0003

Mgt. Presc. 12. Review the existing burro HMAP to ensure it conforms with goals and objectives of the ACEG. Keep burro numbers within the limits set in the HMAP.

Clay Hills Research Natural Area ACEC (see page 216)

Includes allotment Bagdad (0005).

Mgt. Presc. 8. Continue to exclude grazing by livestock and burros. Note: Much of the ACEC is currently fenced to exclude grazing by livestock.  
Mgt. Presc. 9. Monitor the effects of browsing by deer and modify fences if necessary.

Three Rivers Riparian ACEC (see page 217)

Includes allotments Alamo Crossing (0001), Artillery Range (0003), Chicken Springs (0021), DOR (0031), Greenwood Community (0039), Alamo (3001), Palmerita (3063), Primrose (3069), Santa Maria Community (3074), Santa Maria Ranch (5046).

Mgt. Presc. 13. Manage livestock and burro grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into AMPs and HMAPs.

Desired Plant Community (DPC)

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

The RMP calls for a reexamination of perennial - ephemeral allotments, to identify areas producing too small a volume of perennial forage to carry livestock throughout the year. Areas primarily producing ephemeral forage will be designated as ephemeral rangeland, to protect the small population of perennial plants, dependent wildlife, and soil-watershed values. Classification of ephemeral rangelands will be accomplished by collecting Ecological Site Inventory data, utilization and trend data through monitoring studies, and evaluating current grazing practices. All data will be analyzed and the results used to classify rangelands, as mandated in regulations defined in the "Ephemeral Rule." Season of use, livestock preference, and pasture rotation may be affected on some allotments.

We will continue to work closely with the individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to prepare new AMPs and update existing AMPs.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or Gordon Bentley, at (602) 757-3161.

Sincerely,

/S/ ELAINE F. MARQUIS

Elaine F. Marquis  
Area Manager

cc:  
Henri Bison  
Ken McReynolds

L-2



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2473 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025  
0479r

March 26, 1991

James L. Nelson  
Secretary-Treasurer  
Grapevine Springs Ranch, Inc.  
P.O. Box 1016  
Wickenburg, Arizona 85358

Dear Mr. Nelson:

We have received your comments on our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). Thank you for participating in this public document and for your interest in making it the best possible plan for managing the public lands in this resource area for the next 20 years.

The proposed decision in the draft RMP/EIS which deals with acquiring private lands along the Santa Maria River is a management prescription in the proposed Three Rivers Riparian Area of Critical Environmental Concern (ACEC), as shown on page 217. Management Prescription number 8, states, "Acquire 14,496 acres of private and 3,655 acres of state (surface and subsurface) and close to mineral entry." All proposed actions in the Resource Management Plan are analyzed to determine their impacts on the natural environment of public lands, through the Environmental Impact Statement process. The RMP sets forth general guidelines for the management of public lands for twenty years in the future. Plans for specific actions for each resource will then be developed in activity plans.

This is only a proposed action and does not represent in any way a taking of private property. If the decisions outlined in the draft RMP become the plan for management of public lands in the resource area, nothing would be done without the desire and consent of private land owners. We recognize your rights as a land owner. However, exchange of private and public lands cannot occur in the future, even if both parties desire such an action, if it has not been analyzed in an environmental document and made a part of a resource management plan.

Another management prescription which would affect your livestock grazing operation is Management Prescription number 13, "Manage livestock and burro grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into AMPs (Allotment Management Plans) and (Herd Management Area Plans, for wild horses and burros) HMAPs." Development of AMPs and HMAPs for livestock and wild horse and burro management along the Santa Maria River is a standard BLM process, which was discussed in our two existing grazing EISs. Decisions in the EISs are being brought forward and made current in the RMP.

Page 2

The presence of ACECs within an allotment will be an important factor in determining priorities for AMP development and new range improvements. Construction of new range improvements will follow schedules built into new and existing AMPs. Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

The proposed management prescriptions for the Three Rivers ACEC are designed to protect and enhance important or unique values such as the bald eagle, riparian resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

We will continue to collect Ecological Site Inventory data and data from utilization and trend monitoring studies, to evaluate the effectiveness of current grazing practices and to propose changes for the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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Your comment letter will be published, along with all letters received, in the proposed Resource Management Plan and final Environmental Impact Statement.

After the comment period ends on April 13, 1991, we will analyze all comments. Those comments which provide new information, or address the adequacy of the RMP/EIS or the merits of the alternatives, or both, will be incorporated into the proposed Resource Management Plan and final Environmental Impact Statement. We hope to have this second document completed by late summer.

You will receive a copy of the document when it has been printed and is ready for distribution to the public.

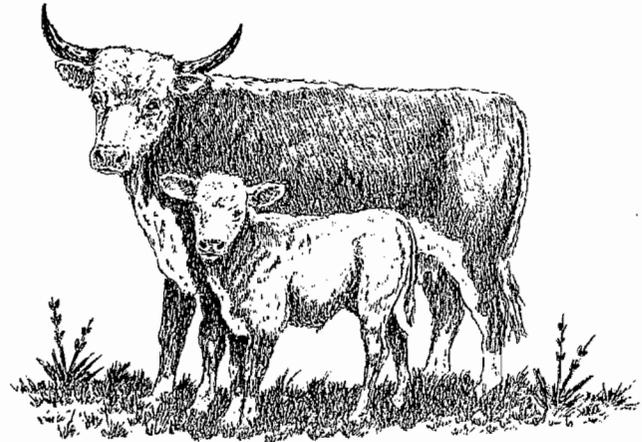
We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you if you desire to make further comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161. Again, thank you for your help and interest.

Sincerely,

*Elaine F. Marquis*

Elaine F. Marquis  
Area Manager



L-3



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



April 1, 1991

Dan Pearson  
Senior Co-chairman  
The Desert Tortoise Council  
5319 Cerritos Avenue  
Long Beach, California 90805

Dear Mr. Pearson:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The following information is in response to your specific comments and questions.

Answers to Comment in First Paragraph

All Areas of Critical Environmental Concern (ACEC), proposed for desert tortoise habitat in the Kingman RMP, contain lands classified as Category I desert tortoise habitat, except for the Western Bajada ACEC. The criterion for Category I classification includes the existence of a habitat area essential to the maintenance of large, viable populations of desert tortoises, and areas where BLM can effectively resolve conflicts. Based on the best available information, the ACECs proposed in the RMP, meet these criteria...they do support viable populations. The ACECs are often adjacent to other tortoise habitats classified in a lower category, due to lower tortoise densities and/or a reduced capability to resolve conflicts, usually due to scattered land ownership patterns.

We have received criticism that we have tried to include too much of the tortoise habitat in our resource area within ACECs. We feel this criticism is not valid. We have attempted to only include the most productive tortoise habitat, where BLM has a high percentage of management authority. On the other hand, we have not left tortoise habitat outside of ACECs without protection. Livestock grazing and other rangeland uses on Category II and III habitat will be managed under specific guidelines outlined in the "Desert Tortoise Habitat Management on the Public Lands: A Range-wide Plan", which we are using as a guide when making management decisions on proposed activities in tortoise habitat.

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Answers to Comment for Page 47 (Wildlife Corridors)

A map showing the location and width of wildlife corridors will be included in the proposed Plan and final EIS. We do not know where tortoises traditionally migrated before their habitats were fragmented by roads, powerlines, residential developments, and towns. What we have attempted to do in the RMP is to promote wildlife movement corridors connecting major mountain ranges. Corridors were proposed based on topography, land status, and known movement routes for big and small game (animals with existing data). Movement corridor width ranged from one to four miles based on the same factors, with amount of public land being one of the most limiting factors.

Answers to Comment for Page 50 (Candidate Species)

Proposed actions under this RMP focused on federally listed threatened and endangered plants and animals. Actions involving candidate species were less intensive, except for species of particular concern, as identified by the general public, and BLM resource management specialists. Two plant species and the desert tortoise were the only candidate species identified as issues for this RMP.

Answers to Comment for Page 51 (Black Mountains ACEC)

The Black Mountains were proposed as an ACEC because of the extent and quality of habitat for one of Arizona's premier herds of desert bighorn sheep and rare and unique cultural resources. According to the best available information and the experience of our wildlife biologists, this ACEC provides only marginal habitat for desert tortoise. Much of the Black Mountains ACEC, as well as the surrounding area, is non-habitat or classified as Category III tortoise habitat. Most of the southern portion of the original proposed ACEC is now in wilderness, and only the Eastern Bajada area is classified as Category I habitat, which will be well protected by wilderness designation.

Answers to Comment for Page 52 (Western Bajada)

We agree the Management Prescriptions in the Western Bajada ACEC are adequate to protect desert tortoise in this area. The area is used only lightly or not at all by burros. However, we are considering dropping this ACEC in the proposed Plan and final EIS. Additional inventory data collected last summer was more extensive than in the past and resulted in fewer animals and sign. This data caused us to reclassify this area as category II desert tortoise habitat. Again, we believe we can adequately protect the habitat in this area through our normal management procedures. The area is not within a grazing allotment and has not been grazed for many years. Two sections along the Mojave Trail-Beale Road would be designated as a cultural resources ACEC.

Answers to Comment for Page 53 (White-Margined Penstemon)

Because of the checkerboard land status in Dutch Flat, the area is classified as Category II and III habitat. If we had more significant management control and thereby the ability to resolve conflicts, some of the area might have been

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classified as Category I. We have designated an expanded area to the west for disposal, using the scattered public land in the disposal area as land suitable for exchange for important tortoise habitat on private land in the Category II area. Once these lands become well-blocked public ownership, they can be reclassified as Category I habitat and possibly considered for ACEC status. Until this time, we will manage the Category II habitat according to Bureau procedures outlined in the tortoise rangewide plan. This area provides the best habitat in the entire resource area for the unique white-margined penstemon and this is why it was considered for ACEC designation.

The Eastern Bajada was originally proposed as an ACEC by BLM wildlife biologists, but managers felt very confident the Warm Springs Wilderness Study Area would be designated wilderness by Congress. Most of the desert tortoise habitat now lies within wilderness. ACEC designation was dropped with the understanding the proposed ACEC goals, objectives and management prescriptions would be incorporated into the Wilderness Management Plans.

Answers to Comment for Page 54 (McCracken ACEC)

OHV use has not been documented as a problem in the McCracken Mountains because of the rugged, steep topography. Within the ACEC very few of the washes are navigable. Also, desert tortoise do not make significant use of the washes in areas where boulders are a significant feature of the environment. The Sonoran population of the desert tortoise is much more dependent on boulder-strewn hillsides and knolls than the Mohave desert population. They are not principally inhabiting wash ecosystems as in the Mohave. There is no evidence of OHV destruction of habitat or tortoises in washes anywhere in the resource area.

Answers to Comment for Poachie ACEC

We are considering dropping the proposed closure of washes in the Poachie ACEC for the reasons given above. We agree that Mining Plans of Operation and mandatory bonding is important for the protection and mitigation of impacts on desert tortoise habitat for all ACECs.

Answers to Comment for Aubrey Peak ACEC

The Aubrey Peak area has not been determined to be "significant" tortoise habitat. The only evidence of tortoise in the Aubrey Peak area is one scat and one carcass reported by BLM and Arizona Game and Fish Department biologists. Transects conducted by BLM tortoise biologists have resulted in no tortoise sign.

Answers to Comment for Page 78 (Closure to Livestock)

We see no need to close ACECs to livestock grazing at this time. Existing research literature does not support damage to desert tortoise habitat when livestock are managed properly. It would be legally impossible for us to restrict livestock completely from desert tortoise habitat without sufficient research evidence that moderate grazing is harmful. On the other hand, we have the laws, regulations, and policy necessary to properly manage livestock grazing in desert tortoise habitat. We also have a large volume of research

and practical application data which points to livestock and wildlife being compatible on rangelands, as long as grazing occurs properly, according to established rules of good grazing principles. Our challenge is to continue to collect scientific data needed to make sound management decisions, and to graze arid rangelands moderately, even during years of exceptional rainfall.

Disposal of "Coverrite" Boulders

Both the McCracken and Poachie ACECs are closed to mineral material disposals. This includes a closure to removal of boulders, as well as sand and gravel, and clay.

Answers to Comment for Page 87 (Factors Triggering Review of Management Actions)

We agree that downward population trends, increases in mortality, and reductions in forage (i.e., drought, overgrazing, etc.) should trigger a review of management actions in desert tortoise habitat. This wording can be incorporated into the proposed Plan and final EIS.

Answers to Comment for Page 128 (Impacts From Mineral Development)

We will change the wording on page 128, under "IMPACTS TO SPECIAL STATUS SPECIES--from Mineral Development" to include animal species in the last sentences of paragraphs 1 and 2. The sentence would read, "Review and possible modification...causing a plant or animal species to be listed ..."

We agree that mineral development would have long-term cumulative impacts on desert tortoise habitat, but this would occur on very small areas and impacts could be mitigated. This wording can be added to page 128.

Answers to Comment for Page 137 (Alternative 1 Versus Alternative 2)

We do not agree that impacts of mineral development on wildlife under Alternative 2 are "slightly less" than under Alternative 1. We believe MPOs and mandatory bonding will allow us to mitigate impacts to wildlife and result in significantly less cumulative impacts. We have not singled out any one species in this analysis, but have implied this is true for all wildlife species.

Answers to Comment for Last Paragraph

The RMP is designed to provide general guidance and direction to management, there is not sufficient room in one volume to satisfy the needs of all resources for specific guidance. Specific guidance is provided by activity plans, which adhere to the guidance given in an EMP. The statements on page 34, "Desert Tortoise:" follow the desert tortoise rangewide plan and Arizona State and Phoenix District guidance in Instruction Memoranda. These statements provide adequate guidance to the Area Manager to prepare resource activity plans (e.g., AMPs, burro Herd Management Area Plans (HMAP), and recreation plans), which include protection of desert tortoise habitat.

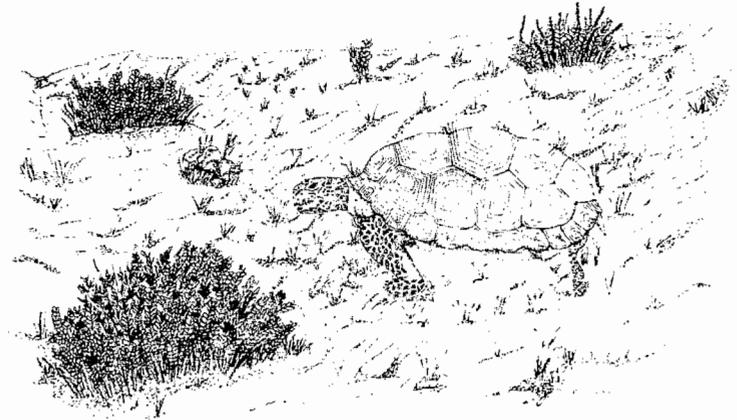
We want to continue to work closely with you and other interested environmental groups, individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and recreation groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you better understand the RMP development process and the actions we are proposing for the protection of desert tortoise habitat. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

/s/ ELAINE F. MARQUIS

Elaine F. Marquis  
Area Manager



L-4



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY, REFER TO:  
1510  
025

March 25, 1991

Lois J. Hubbard  
Supervisor, District 4  
Chairman, Board of Supervisors  
Mohave County  
P.O. Box 390  
Kingman, Arizona 86402

Dear Ms. Hubbard:

Thank you for your letter expressing concern for the Kingman Resource Management Plan (RMP) and continued livestock grazing as an important use on public lands. I would like to take this opportunity to state that I am also committed to doing all I can, as a public land manager, to ensure the continuation of livestock grazing on allotments within the resource area.

Grazing was not identified by any person or group as an issue, during the public scoping process, at the beginning of the development of the Kingman RMP. Livestock grazing has been identified as impacting other resources and uses and, therefore, has been discussed in the RMP. Council on Environmental Quality (CEQ) regulations and BLM planning manual procedures do not allow us to cover subjects in a proposed Plan and final Environmental Impact Statement, which were not discussed in the draft RMP/EIS.

Through the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, Congress has directed the Secretary of the Interior to:

- \* promptly develop plans and regulations for the protection of Areas of Critical Environmental Concern (ACEC), see Section 102(a)(11);
- \* give priority to ACECs in developing and maintaining inventories of the public land, see Section 201(a);
- \* give priority to the designation and protection of ACECs in developing and revising land use plans, see Section 202(c)(3).

The Bureau of Land Management has incorporated the ACEC regulations in its planning regulations. These regulations require that "...areas having potential for ... ACEC designation and protection management shall be identified and considered throughout the resource management planning (RMP) process..." see 43 CFR 1610.7-2. The BLM's intent is not to identify and designate all areas that have special values, but to focus on those requiring special management attention.

The Arizona Natural Areas Protection Act of 1986 states "It is, therefore, the public policy of the State of Arizona to secure for the people of present and future generations the benefit of an enduring resource of natural areas by establishing a system of natural area preserves, and to provide for the protection of these natural areas." The Governor set up the Riparian Habitat Task Force, Executive Order 89-16, to begin complying with provisions of the Act and begin a Natural Areas Study. The Department of the Interior has four bureaus in the core group of the Natural Areas Study, including the Bureau of Land Management (BLM). Some of the recommendations made by the Study are:

- \* Additional state statutes including protective policies and mechanisms for the protection of streams, wetlands, and riparian systems, threatened fish and wildlife species and their critical habitats, and endangered plant species are urgently needed.
- \* Natural areas represent ecological systems that include soil, rocks, minerals, water, air, plants, animals, and human influences. A more holistic educational approach including all aspects of the environment should be implemented, reaching all segments of the public.

The Department of the Interior fully supports the goals of the Arizona Natural Areas Program as stated in the 1989 Arizona Statewide Comprehensive Outdoor Recreation Plan.

The Arizona Riparian Council has stated that Arizona has lost a significant percentage of its original riparian areas and remaining areas are in only fair to poor condition. Protection of riparian areas is extremely important in a state where arid and semi-arid climatic conditions cause streams and wetlands to be jewels in the desert. An extremely high percentage of wildlife indigenous to the desert, or using the desert in the winter, or as a stop on a seasonal flyway, rely heavily upon the water, cover, and forage produced by riparian areas.

BLM has been severely criticized by the General Accounting Office (GAO) for their lack of dynamic leadership in managing riparian areas on public lands, (Public Rangelands - Some Riparian Areas Restored, But Widespread Improvement Will Be Slow GAO/RCED-88-105).

In 1986, Charles H. Callison, Director of the Public Lands Institute of the Natural Resources Defense Council (NRDC) stated, "There are ... many areas of exceptional scenic beauty, or having life-sustaining springs and riparian zones, or holding archaeological or botanic treasures in the arid lands of Arizona ... Yet not a single ACEC has been designated within the 12.2 million acres of BLM lands in Arizona, ..."

The Bureau of Land Management designates ACECs only through its resource management planning process. To be considered in an RMP, a potential ACEC must first pass a screening process by meeting specific criteria of being both relevant and important. This is a public participation process.

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CONSULTATION AND COORDINATION

The following are the objectives of Areas of Critical Environmental Concern outlined in BLM Manual 1613.02:

- \* "ACEC designation highlights areas where special management attention is needed to protect, and prevent irreparable damage to, important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards.";
- \* "Designation may also support a funding priority."
- \* "... indicates to the public that the BLM recognizes that an area has significant values and has established special management measures to protect those values.";
- \* "... serves as a reminder that significant value(s) or resource(s) exist which must be accommodated when future management actions and land use proposals are considered near or within an ACEC." and;

BLM Manual 1613.11A3 states, "A natural process or system (includes) endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features."

Protection of ACECs is accomplished by special management prescriptions which, "... would not be necessary and prescribed if the critical and important features were not present. ... Management prescriptions providing special management attention should include more detail than prescriptions for other areas and should establish priority for implementation." (BLM Manual 1613.12)

"ACECs may be designated within wilderness areas." However, "ACEC designation shall not be used as a substitute for a wilderness suitability recommendation." An ACEC should be able to stand on its own relevance and importance. (BLM Manual 1613.33D)

The Joshua Tree Forest-Grand Wash Cliffs ACEC was proposed by the Phoenix District Advisory Council (multiple use council), a citizens group in Meadview, and BLM biologists, and is supported by the National Park Service - Lake Mead National Recreation Area. In 1967, the area was designated as a National Natural Landmark by the Secretary of the Interior. The area contains the most outstanding examples of the Joshua tree community.

The Black Mountains ACEC contains outstanding habitat for one of Arizona's premier herds of desert bighorn sheep and extremely rare and important cultural resources. As human activities increase at a tremendous rate, suitable habitat of adequate size for bighorn sheep is becoming very scarce. This ACEC is supported by the Arizona Desert Bighorn Sheep Society, Arizona Game and Fish Department, The Desert Tortoise Council, and The Arizona Nature Conservancy.

The McCracken and Poachie ACECs for desert tortoise have been proposed by The Arizona Nature Conservancy and the Desert Tortoise Council. These areas are classified as category I desert tortoise habitat. The U.S. Fish and Wildlife Service is currently analyzing whether the desert tortoise in Arizona should be listed as threatened or endangered. BLM managers are developing plans to manage desert tortoise habitat to reduce the need for listing.

The proposed ACECs on Wright Creek, Cottonwood Creek, Burro Creek, Big Sandy River, Santa Maria River, and Bill Williams River have been proposed by The Arizona Nature Conservancy and the U.S. Fish and Wildlife Service and are supported by the Maricopa and Prescott Audubon societies and the general public. These areas contain rare and unique riparian areas, rare cultural resources, such as threatened and endangered or state listed species as the bald eagle and black-hawk, and unique scenic values.

Kingman Resource Area personnel recognize the importance of livestock grazing in these ACECs. Specific management prescriptions in each ACEC provide for continued grazing through specific grazing prescriptions now existing, or to be developed in future Allotment Management Plans. We are committed to helping in every way possible to ensure grazing operations can continue. We are also committed to protection of natural resources.

In the past several weeks I and my staff have met with Kingman and Bullhead City and Mohave County personnel, Council members from the four Indian Tribes surrounding public lands in our resource area, National Park Service personnel, the Cyprus Bagdad Copper Company, Byner Cattle Company, Kingman Resource Area Grazing Advisory Board, Mohave Livestock Association, and mining industry representatives working in Mohave County.

We have discussed the RMP in detail and through cooperation with all interested parties, we have been able to solve a number of communication problems and clarify confusing language in the RMP. We will continue to seek opportunities to work with user groups and the general public. We have scheduled meetings in the near future with Cyprus Bagdad Copper Company, Byner Cattle Company, several members of the Grazing Advisory Board, and the Mohave Livestock Association to discuss changes in the RMP, as we incorporate the comments we have received.

We appreciate the help we have received from the public to improve our Resource Management Plan. Again, we appreciate your interest in improving management on the public lands in Mohave County. If you have further questions, or would like to discuss this further, please give me a call at 757-3161.

Sincerely,

*Elaine F. Marquis*

Elaine F. Marquis  
Area Manager

L-5



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025

March 22, 1991

Cecil H. Miller, Jr., President  
Arizona Farm Bureau Federation  
3401 E. Elwood Street  
Phoenix, Arizona 85040-1625

Dear Mr. Miller:

Thank you for your letter to Henri Bisson, Phoenix District Manager, concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). He has asked me to respond to your questions and the following information is in answer to them. We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Gerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements. This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

New AMPs will be written according to a schedule to be included in the next updated Range Program Summary (RPS), to be published within a year. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). The presence of Areas of Critical Environmental Concern (ACEC) within allotments will be an important factor in determining priorities for AMP development. Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Page 2

Specific Management Prescriptions for each ACEC proposed, are shown in Appendix 18. The proposed management prescriptions for each ACEC are designed to protect and enhance important or unique values such as the Joshua tree forest, bighorn sheep, Hualapai Mexican vole, bald eagle, black-hawk, desert tortoise, riparian areas, cultural and paleontological resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices. Most Management Prescriptions in the Preferred Alternative do not exclude livestock, exceptions are the Hualapai Mountain, Carrow-Stephens, and Clay Hills ACECs.

The following are the management prescriptions for each ACEC, which apply to livestock grazing. You will note these prescriptions are in concert with the desired plant community objectives for range management, identified in the grazing EIS documents.

Joshua Tree Forest - Grand Wash Cliffs ACEC (see page 202)

Includes allotments Diamond Bar A (0029) and Gold Basin (0037).

Mgt. Presc. 16. Review current management to assure livestock grazing is in accordance with goals and objectives of the ACEC. Develop desired plant community descriptions for Joshua tree sites and include these in AMP objectives and design grazing management techniques to achieve them.

Black Mountains ACEC (see page 204)

Includes allotments Big Ranch A (0007), Black Mountain A (0010), Fort MacEwen A (0034), Gediondia (0036), Mud Springs (0056), Portland Springs (0061), Thumb Butte (0068), Big Ranch B (0081), and Fort MacEwen B (0082).

Mgt. Presc. 12. Develop desired plant community descriptions for important bighorn sheep habitat and include these in AMP and HMP (Habitat Management Plan) objectives, and design specific management actions to achieve them. Manage livestock grazing to prevent excess utilization.

Mgt. Presc. 13. Review the existing burro Herd Management Area Plan (HMAP) to ensure it conforms with goals and objectives of the ACEC. Keep burro numbers within 320 to 480.

Wright and Cottonwood Creeks Riparian and Cultural ACEC (see page 207)

Includes allotments Crozier Canyon (0026), Hackberry (0042), Truxton Canyon A (0070), and Valentine (0072).

Mgt. Presc. 13. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions for the riparian zone and design grazing management objectives and grazing systems to achieve them.

Cherokee Point Antelope Habitat ACEC (see page 207)

Includes allotment Crozier Canyon (0026).

Mgt. Presc. 8. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into the AMP. Manage pronghorn antelope habitat at its optimum potential.

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CONSULTATION AND COORDINATION

Hualapai Mountain Research Natural Area ACEC (see page 208)

Includes allotments Boriana A (0011), Hualapai Peak (0047), Hibernia Peak A (0050), La Cienega (0051), and Yellow Pine (0078).

Mgt. Presc. 10. Exclude livestock from occupied and historic vole habitat (2,114 acres). Note: Occupied sites are currently fenced to exclude grazing. Current rangeland management goals are to restore all riparian areas, which includes historical vole habitats.

Mgt. Presc. 11. Review existing allotment management plans and incorporate objectives designed to protect and enhance watersheds surrounding the ACEC. Develop desired plant community descriptions and design specific management actions to achieve them.

White-Margined Penstemon Reserve ACEC (see page 209)

Includes allotments Boriana A (0011), Happy Jack Wash (0043), and La Cienega (0051).

Mgt. Presc. 10. Develop and implement a livestock management plan to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and include these in the AMP.

Carrow-Stephens Ranches ACEC (see page 210)

Includes allotments Big Sandy (0008) and Diamond Joe (0028).

Mgt. Presc. 6. Fence the ACEC and remove it from consideration of public livestock grazing (1,107 acres). Note: The permittee is currently excluding livestock from the portion of the ACEC east of Highway 93 in order to maintain the historical character of the ranch houses. This action is voluntary, because of their interest in protecting the area, and the permittee agrees with this management prescription.

McCracken Desert Tortoise ACEC (see page 211)

Includes allotments Artillery Range (0003), Bateman Springs (0006), and Chicken Springs (0021).

Mgt. Presc. 10. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

- Chicken Springs 0021
- Bateman Springs 0006
- Artillery Range 0003

Mgt. Presc. 11. Manage livestock grazing to ensure adequate and suitable perennial and ephemeral forage and cover for tortoises throughout the year, especially during the spring and late summer-fall.

Mgt. Presc. 12. Conduct tortoise inventory, monitor habitat condition, and assess impacts of livestock grazing. Make necessary adjustments in livestock numbers and grazing season.

Note: These Management Prescriptions are consistent with BLM policy as outlined in the document - Desert Tortoise Habitat Management on the Public Lands: A Range-wide Plan and BLM Arizona State and Phoenix District Instruction Memoranda.

Poachle Desert Tortoise Habitat ACEC (see page 212)

Includes allotments Arrastra Mountain (0002), Black Mesa A (0009), Burro Creek Ranch (0014), Greenwood Community (0039), and Black Mesa B (0110).

Mgt. Presc. 10. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

- Greenwood Community 0039
- Burro Creek Ranch 0014
- Arrastra Mountain 0002

Mgt. Presc. 11. Manage livestock grazing to ensure adequate and suitable perennial and ephemeral forage and cover for tortoises throughout the year, especially during the spring and late summer-fall.

Mgt. Presc. 12. Conduct tortoise inventory, monitor habitat condition, and assess impacts of livestock grazing. Make necessary adjustments in livestock numbers and grazing season.

Note: These Management Prescriptions are consistent with BLM policy as outlined in the document - Desert Tortoise Habitat Management on the Public Lands: A Range-wide Plan and BLM Arizona State and Phoenix District Instruction Memoranda..

Aubrey Peak Bighorn Sheep Habitat ACEC (see page 213)

Includes allotments Artillery Range (0003) and Planet Ranch (Lake Havasu Resource Area).

Mgt. Presc. 13. Develop desired plant community descriptions for bighorn sheep habitat and include these in AMP and HMP objectives, and design management objectives to achieve them. Manage habitat at its optimum potential for bighorn sheep.

Burro Creek Riparian and Cultural ACEC (see page 215)

Include allotments Bagdad (0005), Black Mesa A (0009), Burro Creek (0013), Burro Creek Ranch (0014), Greenwood Community (0039), Greenwood Peak Community (0040), and 7L Cattle Company (0111).

Mgt. Presc. 11. Develop and implement livestock management plans incorporating desired plant community descriptions to achieve goals and objectives of the ACEC on the following allotments:

- Bagdad 0005
- Greenwood Peak Community 0039
- Burro Creek Ranch 0014
- Artillery Range 0003

Mgt. Presc. 12. Review the existing burro HMAP to ensure it conforms with goals and objectives of the ACEC. Keep burro numbers within the limits set in the HMAP.

Clay Hills Research Natural Area ACEC (see page 216)

Includes allotment Bagdad (0005).

Mgt. Presc. 8. Continue to exclude grazing by livestock and burros. Note: Much of the ACEC is currently fenced to exclude grazing by livestock.

Mgt. Presc. 9. Monitor the effects of browsing by deer and modify fences if necessary.

Three Rivers Riparian ACEC (see page 217)

Includes allotments Alamo Crossing (0001), Artillery Range (0003), Chicken Springs (0021), DOR (0031), Greenwood Community (0039), Alamo (3001), Palmerita (3063), Primrose (3069), Santa Maria Community (3074), Santa Maria Ranch (5046).

Mgt. Presc. 13. Manage livestock and burro grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into AMPs and HMAPs.

Desired Plant Community (DPC)

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

The RMP calls for a reexamination of perennial - ephemeral allotments, to identify areas producing too small a volume of perennial forage to carry livestock throughout the year. Areas primarily producing ephemeral forage will be designated as ephemeral rangeland, to protect the small population of perennial plants, dependent wildlife, and soil-watershed values. Classification of ephemeral rangelands will be accomplished by collecting Ecological Site Inventory data, utilization and trend data through monitoring studies, and evaluating current grazing practices. All data will be analyzed and the results used to classify rangelands, as mandated in regulations defined in the "Ephemeral Rule." Season of use, livestock preference, and pasture rotation may be affected on some allotments.

Information concerning the extent of public, state, and private land acres in each of our 83 livestock grazing allotments is contained in the file of each individual grazing permittee. The consolidation of this data would place a tremendous workload on my staff. With our current priorities, we cannot provide you with this information at this time. These files are located in the Kingman Resource Area office and they are available for your examination during regular business hours (7:30 a.m. to 4:30 p.m.).

Your request that we delineate and rename the allotments as BLM or co-mingled allotments cannot be accomplished in the RMP process. This would represent a bureauwide change in procedures and can only be initiated by our Director in Washington.

We will continue to work closely with the individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to prepare new AMPs and update existing AMPs.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or Gordon Bentley, at (602) 757-3161.

Sincerely,

/s/ ELAINE F. MARQUIS

Elaine F. Marquis  
Area Manager

cc:  
Henri Bisson  
Ken McReynolds

L-6



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025  
0488r

April 9, 1991

Robert L. Harrison  
Registered Professional Geologist  
P.O. Box 7228  
Brookings, Oregon 97415

Dear Mr. Harrison:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

I would like to respond to your specific comments with the intent of clarifying your questions and concerns about our proposed actions affecting mineral development in the resource area.

The specific actions we have proposed in the RMP are consistent with federal laws and Department and Bureau policy. We are responding to our legal mandate to encourage and facilitate the development of public land mineral resources by private industry. The actions proposed in the RMP do meet this mandate and the following information taken from the RMP highlights and summarizes our proposals for better understanding.

Map IV-1 on page 121, shows the location of areas where locatable minerals are expected to have a high potential to occur. Map III-2 on page 98, shows the location of areas where sand and gravel are expected to have a high potential to occur. I would ask you to compare these two maps with the map of Special Management Areas - Alt 2 (see map pockets), showing the boundaries of Areas of Critical Environmental Concern (ACEC), and the specific Management Prescriptions listed for each ACEC in Appendix 18. Let us take the Black Mountains ACEC as an example.

Locatable Minerals

No land within the area of high potential for locatable minerals, in the Black Mountains ACEC, has been withdrawn from mineral entry. Management Prescription number 3, page 203, states "Mining Plans of Operation (MPO) and mandatory bonding would be required for all mineral exploration and development activities." This does not restrain any individual or corporation from continuing their normal mining activities on valid claims on public lands. By requiring an MPO and mandatory bonding on all operations, including those with soil disturbing activities of less than five acres, BLM can better monitor compliance with regulations and ensure rehabilitation is adequate and complete after mining ceases. In our meetings with representatives of the mining industry, we have received no negative comments about the requirement

of MPOs and mandatory bonding for small operations. On the contrary, we have been told by larger operators they are glad of this requirement, because operators who act irresponsibly give the entire industry a bad image. They believe everyone should be required to comply with the same procedures.

The Management Prescriptions for minerals on the Black Mountains ACEC, are not "defacto withdrawal(s) under the guise of protecting a species ..." They are designed to protect the solitude and habitat of bighorn sheep. We agree bighorn sheep are not an endangered species. The relevance and importance statements in the Black Mountains and Aubrey Peak ACECs address only their uniqueness and value as an important natural component of the Arizona desert, worthy of protection and enhancement.

You made no mention of the withdrawals from mineral entry along the stream channels in the several riparian ACECs. An area one-eighth mile on either side of the stream has been proposed for withdrawal from mineral entry in order to protect the riparian habitat from degradation. These areas generally do not have a high potential for occurrence of locatable minerals. One exception is the central portion of Burro Creek, adjacent to the Gyprus Bagdad copper mine. We have tentatively discussed removing this area from our ACEC proposal in the proposed Plan and final EIS.

All withdrawals are subject to valid existing rights.

Saleable Minerals

Map III-2 shows little potential for sand and gravel within the Black Mountains ACEC, but high potential along Detrital Wash and just east of Bullhead City. The Black Mountains do contain areas of sand and gravel, but the deposits in Detrital Wash and near Bullhead City are more extensive and closer to where the material would be used. Management Prescription number 6 for the Black Mountains ACEC, page 204, states "Do not allow new areas for mineral material disposals." However, no restrictions are placed on the removal of mineral materials in Detrital Wash. We have proposed Management Prescription number 6 to prevent unnecessary disturbance to bighorn sheep.

Mineral material disposals would not be allowed in desert tortoise habitat to keep boulders from being removed for urban landscaping. Boulders provide critical habitat for the tortoise and these areas generally have a low potential for sand and gravel. Riparian areas would be closed to mineral material disposals, to protect stream channels and streambank vegetation from destruction caused by sand and gravel removal. Most of these areas do not have a high potential for large deposits of sand and gravel, and other suitable sources are readily available in the same general areas.

Leasable Minerals

The Black Mountains ACEC, as well as the entire resource area, have a low to zero potential for occurrence of oil and gas.

Management Prescription number 4, page 204, states "Mineral leasing would be allowed, subject to the following stipulations designed to protect resource values:

- No activity in lambing grounds from December 1 through May 31.
- To avoid harassment and undue disturbance of bighorn sheep, workers would not be allowed to live on-site."

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Other stipulations deal with restricting public access on roads used by drillers and rehabilitating roads no longer needed.

Management Prescription number 5 states "Prohibit oil and gas production facilities inside the boundaries of lambing grounds."

These restrictions are designed to minimize conflicts between people and bighorn sheep and allow lambing to occur in solitude, which is essential for the health and maintenance of bighorn sheep. The lambing grounds are very site specific and small in size, in relation to the rest of the mountain range and other areas open to lease. They should have little negative impact on the oil and gas industry. Extensive oil and gas exploration and development activities occurring in areas of high potential, in states such as Wyoming and New Mexico, have proven these stipulations are not a deterrent to production of oil and gas. As you are well aware, these restrictions do not apply to locatable mineral activities.

As you can see, the proposed actions in the Black Mountains ACEC do not withdraw large areas from lease, or place them under a "no surface occupancy" (NSO) restriction. They do, however, remove the existing 327,000 acre NSO restriction currently covering the Black Mountains.

Riparian zones have a NSO restriction one-eighth mile on either side of the stream channel to protect riparian habitat. Slant drilling for oil and gas can logically occur at this distance. There is no NSO restriction in any other area.

We believe our RMP proposed actions are designed to actively encourage and facilitate "environmentally sound exploration, extraction,..." of mineral resources and "reclamation" of mined lands in the resource area. These ACECs are designed to protect critical resources, while still allowing a multitude of uses such as mining, livestock grazing, camping, hiking, picnicking, swimming, hunting, fishing, ORV use, rights-of-way, to occur on the land.

I am enclosing a table we are preparing for inclusion in the proposed Plan and final EIS, listing the acreages of proposed mineral closures for each ACEC. As you can see, the acreages of withdrawal are small for locatable and leasable minerals. As I pointed out earlier, areas where we will not allow mineral material disposals do not occur in high value areas near major use centers. In addition, we are planning to eliminate the Western Bajada ACEC and its proposed withdrawals, further lowering the acreages shown in the table.

I hope this letter has addressed and clarified your concerns. We are committed to completing a RMP, which accurately reflects the use and protection of the varied resources occurring on the resource area. We are also committed to protecting the valid existing rights of all users of the public lands and encouraging development of public mineral resources.

If you have further questions or want more information, please contact me or Gordon Bentley, to schedule a day and time when we can visit with you. Again, thank you for your interest in management of the public lands and your help in developing the Kingman RMP/EIS.

Sincerely,

**/s/ JESSE J. JUAN**

Jesse J. Juan  
Assistant Area Manager

Enclosure (1)  
Mineral Closure Table

### Preferred Alternative Mineral Closures by Area of Critical Environmental Concern

ACEC Name	Federal Mineral Estate*				Total Federal Surface Acres
	Mineral Material Disposals	Withdrawn from Mineral Entry	Mineral Leasing with No Surface Occupancy	Withdrawn from Mineral Leasing	
Joshua Tree Forest- Grand Wash Cliffs	22,896	5,596	0	0	39,085
Black Mountains	95,938	0	0	0	122,832
Western Bajada Tortoise & Cultural	8,909	8,909	0	8,909	15,866
Wright-Cottonwood Creeks Riparian & Cultural	3,925	3,925	3,925	0	27,300
Cherokee Point Antelope Habitat	0	0	0	0	54,457
Hualapai Mountain	2,183	2,183	2,183	0	3,300
White-Margined Penstemon	13,980	0	0	0	17,493
Carrow-Stephens Ranches	1,172	1,172	1,172	0	1,795
McCracken Desert Tortoise Habitat	19,039	0	0	0	22,354
Poachie Desert Tortoise Habitat	31,388	0	0	0	32,118
Aubrey Peak Bighorn Sheep Habitat	2,391	0	0	0	2,391
Burro Creek Riparian & Cultural	8,850	6,850	6,850	0	28,089
Clay Hills Research Natural Area	1,113	1,113	0	1,113	1,113
Three Rivers Riparian	9,880	9,880	9,880	0	32,089
Campgrounds	320	320	320	0	320
<b>Total Federal Mineral Acres**</b>	<b>219,984</b>	<b>39,948</b>	<b>24,330</b>	<b>10,022</b>	
<b>Total Federal Surface Acres</b>					<b>400,602</b>

\*Acreages *do not* include Closures for Wilderness

\*\*Acreages computed by Geographic Information System (GIS)

L-7



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025

March 26, 1991

Frank L. Hunt  
P.O. Box 58  
Peach Springs, Arizona  
86434

Dear Mr. Hunt:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

The presence of Areas of Critical Environmental Concern (ACEC) within an allotment will be an important factor in determining priorities for AMP development and new range improvements. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

Woodcutting would be allowed in areas found suitable for removal of woodland trees, through a site analysis, and after a management plan has been prepared. A management plan will outline program objectives, long-range goals, and mitigation practices needed to minimize resource conflicts and potential resource damage. In other words, the site must contain trees of sufficient size for harvest, be on slopes and soils which will not be damaged and cause deterioration of the watershed, harvest will not create an eyesore to people on well traveled roads, and will not cause damage to cultural resources or to threatened and endangered plants or animals.

Manipulation of vegetation would continue to be considered on areas found suitable for such treatment through site-specific analysis of important site factors such as slope, aspect, climate, soil type and depth, potential natural community, and existing vegetative type. The type of vegetative manipulation treatment suitable for the site would be determined by analyzing the impacts of possible treatment procedures. Prescribed fire, plowing and seeding, chaining, brush-beating, land imprinting, and herbicides are treatments which would be considered. An environmental analysis would be done on each area to determine impacts.

442

We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

*Elaine F. Marquis*  
Elaine F. Marquis  
Area Manager



L-8



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
4610  
025

March 22, 1991

W. J. Robinson  
P.O. Box 200 Star Route  
Peach Springs, Arizona 86434

Dear Mr. Robinson:

Thank you for your letter to Henri Bisson, Phoenix District Manager, concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). He has asked me to respond to your questions and the following information is in answer to them. We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Gerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

The presence of Areas of Critical Environmental Concern (ACEC) within an allotment will be an important factor in determining priorities for AMP development and new range improvements. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Page 2

Specific Management Prescriptions for each ACEC proposed, are shown in Appendix 18. The proposed management prescriptions for each ACEC are designed to protect and enhance important or unique values such as the Joshua tree forest, bighorn sheep, Hualapai Mexican vole, bald eagle, black-hawk, desert tortoise, antelope habitat, riparian areas, cultural and paleontological resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices.

The Wright and Cottonwood Creeks Riparian and Cultural ACEC and Cherokee Point Antelope Habitat ACEC have been proposed for the Crozier allotment (0026), see pages 206 and 207 of the draft RMP/EIS. The management prescriptions which most affects your livestock operation are shown as follows:

Wright and Cottonwood Creeks Riparian and Cultural ACEC

Mgt. Presc. 13. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions for the riparian zone and design grazing management objectives and grazing systems to achieve them.

Note: As Walt and I discussed during our meeting with the Mohave Livestock Association on March 20th, these are the same objectives we are currently working on with you, in developing the Crozier allotment AMP.

Cherokee Point Antelope Habitat ACEC

Mgt. Presc. 8. Manage livestock grazing to achieve goals and objectives of the ACEC. Develop desired plant community descriptions and incorporate these into the AMP. Manage pronghorn antelope habitat at its optimum potential.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DFC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

We will continue to collect Ecological Site Inventory data and data from utilization and trend monitoring studies, to evaluate the effectiveness of current grazing practices and to propose changes for the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

/s/ ELAINE F. MARQUIS

Elaine F. Marquis  
Area Manager

cc:  
Henri Bisson  
Ken McReynolds



L-9



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025

April 1, 1991

Howard Grounds  
W.F. Cattle Co.  
P.O. Box 270  
Kingman, Arizona 86402

Dear Mr. Grounds:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

The presence of Areas of Critical Environmental Concern (ACEC) within an allotment will be an important factor in determining priorities for AMP development and new range improvements. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future.

Page 2

Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

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A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

/s/ Elaine F. Marquis

Elaine F. Marquis  
Area Manager

cc:  
Ken McReynolds

446

L-10



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025

March 28, 1991

William L. Nugent  
2634 Airway Avenue  
Kingman, Arizona 86401

Dear Mr. Nugent:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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Specific Management Prescriptions for each ACEC proposed, are shown in Appendix 18. The proposed management prescriptions for each ACEC are designed to protect and enhance important or unique values such as the Joshua tree forest, bighorn sheep, Hualapai Mexican vole, bald eagle, black-hawk, desert tortoise, antelope habitat, riparian areas, cultural and paleontological resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices.

The Hualapai Mountain Research Natural Area ACEC has been proposed for the Hibernia Peak A allotment (0050), see page 208 of the draft RMP/EIS. The management prescriptions which most affect your livestock operation are shown as follows:

Hualapai Mountain Research Natural Area ACEC

Mgt. Presc. 10. Exclude livestock from occupied and historic vole habitat (2,114 acres). Note: Occupied sites are currently fenced to exclude grazing. Current rangeland management goals are to restore all riparian areas, which includes historical vole habitats.

Mgt. Presc. 11. Review existing allotment management plans and incorporate objectives designed to protect and enhance watersheds surrounding the ACEC. Develop desired plant community descriptions and design specific management actions to achieve them.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

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447

CONSULTATION AND COORDINATION

BLM defines "desired plant community" as -

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We will continue to collect Ecological Site Inventory data and data from utilization and trend monitoring studies, to evaluate the effectiveness of current grazing practices and to propose changes for the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

/s/Elaine F. Marquis  
Elaine F. Marquis  
Area Manager

cc:  
Ken McReynolds



L-11



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025  
0486r

April 2, 1991

Charles Earle  
Laughlin Land and Cattle Co.  
P.O. Box 6303  
Kingman, Arizona 86402

Dear Mr. Earle:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Monitoring of water quality is a State of Arizona responsibility. It is the responsibility of each land owner to ensure that runoff or stream discharge from their lands meets quality standards set by the state. As the agency in charge of management of the public lands, BLM is responsible for maintaining the quality of water discharged from public rangelands.

Specific Management Prescriptions for each ACEC proposed, are shown in Appendix 18. The proposed management prescriptions for each ACEC are designed to protect and enhance important or unique values such as the Joshua tree forest, bighorn sheep, Hualapai Mexican vole, bald eagle, black-hawk, desert tortoise, antelope habitat, riparian areas, cultural and paleontological resources, and scenic values. The desired plant communities we plan to reach through grazing management will be tied directly to these unique values. Livestock are a very important component of the public lands and are an extremely important tool in helping us to reach ACEC objectives, since vegetative communities can be improved through proper grazing practices.

The Hualapai Mountain Research Natural Area ACEC has been proposed for the Yellow Pine allotment (0078), see page 208 of the draft RMP/EIS. The management prescriptions which most affect your livestock operation are shown as follows:

Hualapai Mountain Research Natural Area ACEC

Mgt. Presc. 10. Exclude livestock from occupied and historic vole habitat (2,114 acres). Note: Occupied sites are currently fenced to exclude grazing. Current rangeland management goals are to restore all riparian areas, which includes historical vole habitats.

Mgt. Presc. 11. Review existing allotment management plans and incorporate objectives designed to protect and enhance watersheds surrounding the ACEC. Develop desired plant community descriptions and design specific management actions to achieve them.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

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449

CONSULTATION AND COORDINATION

BLM defines "desired plant community" as -

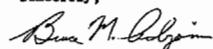
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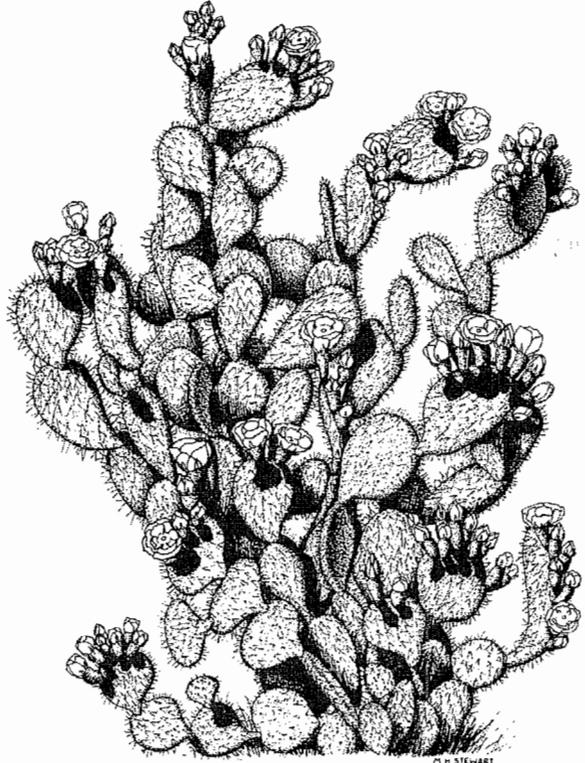
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Sincerely,



Bruce M. Asbjorn  
Acting Area Manager

cc:  
Ken McKeynolds



450

L-12



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025  
0487r

April 2, 1991

Dave Knisely  
P.O. Box 455  
Dolan Springs, Arizona  
86441

Dear Mr. Knisely:

Thank you for your letter to Henri Bisson, Phoenix District Manager, concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). He has asked me to respond to your questions and the following information is in answer to them. We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

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We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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We want to continue to work closely with all individual permittees, the Kingman Grazing Advisory Board, Mohave Livestock Association, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

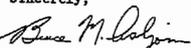
451

CONSULTATION AND COORDINATION

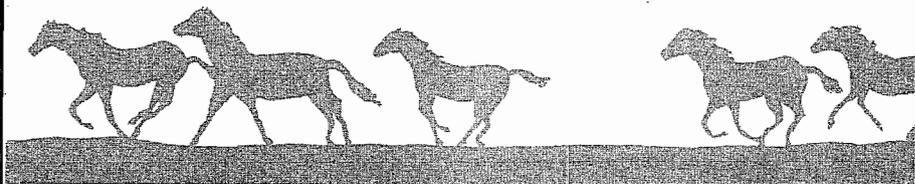
The Bureau will manage wild horses on the Gerbat Mountains Herd Management Area, to achieve and maintain a thriving natural ecological balance on the public lands, in compliance with the Wild and Free-Roaming Horses and Burro Act of 1971. This thriving ecological balance includes domestic livestock, as well as wildlife and wild horses. We will work with you and other affected permittees to manage livestock and wild horse grazing in accordance with provisions to be outlined in the approved Resource Management Plan (RMP), when it has been accepted and signed by the Arizona BLM State Director. A Herd Management Area Plan (HMAP) will then be completed, finalizing the management specifications necessary to maintain a viable wild horse population. The weight of a viable wild horse herd will not fall entirely on the Mt. Tipton allotment, but it will be an integral part of the herd area. The HMAP will be completed after the RMP is approved.

We will manage wild horses, livestock grazing, and other uses, on the Mount Tipton Wilderness Area in accordance with the Arizona Desert Wilderness Act of 1990 and the Wilderness Act of 1964. We will work with you and other affected permittees to assist, and facilitate movement of livestock and maintenance of waters, fences, and other range improvements within the Mount Tipton Wilderness Area. An Allotment Management Plan (AMP) for your allotment, will be developed in consultation with you, in order to meet the objectives in the Gerbat/Black Mountain Grazing Environmental Statement, the approved RMP, and the wilderness legislation.

I hope this information will help you to understand the impacts an approved Kingman RMP might have on your cow-calf operation. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,  
  
 Bruce M. Asbjorn  
 Acting Area Manager

cc:  
 Ken McReynolds



452

L-13



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2425 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY  
PLEASE REFER TO:  
025  
0484r

April 2, 1991

Clinton C. and Sandra J. Cofer  
Cofer Ranch  
H C 30 Box 230  
Kingman, AZ 86401

Dear Mr. and Mrs. Cofer:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Gerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

The presence of Areas of Critical Environmental Concern (ACEC) within an allotment will be an important factor in determining priorities for RMP development and new range improvements. Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

Actions needed to improve access would follow the decisions outlined on page 59 and as shown in Appendix 24. The Bureau's intent is to pursue access acquisitions with the agreement of the private land owner.

Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Monitoring of water quality is a State of Arizona responsibility. It is the responsibility of each land owner to ensure that runoff or stream discharge from their lands meets quality standards set by the state. As the agency in charge of management of the public lands, BLM is responsible for maintaining the quality of water discharged from public rangelands.

We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

The concept of "desired plant communities" takes the "potential natural community", or climax seral stage of Ecological Site, one step further. BLM recognizes it may not always be feasible, or desirable, to manage for a climax seral stage, in order to achieve livestock or other resource management objectives.

BLM defines "desired plant community" as -

A plant community which produces the kind, proportion, and amount of vegetation necessary for meeting or exceeding the land use plan goals and activity plan objectives established for the site. The DPC becomes the vegetation management objective for the site and must be consistent with the site's capability to produce the desired vegetation through management, land treatment, or a combination of the two.

We want to continue to work closely with all individual permittees, the Kingman Grazing Advisory Board, Mohave Livestock Association, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

Bruce Ashbjorn  
Acting Area Manager

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CONSULTATION AND COORDINATION

L-14



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:  
1610  
025  
0485r

April 2, 1991

Ken and Cristi McReynolds  
Cofer Ranch  
H C 30 Box 230  
Kingman, AZ 86401

Dear Mr. and Mrs. McReynolds:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

The RMP summarizes the decisions in the Cerbat-Black and Hualapai/Aquarius final grazing Environmental Impact Statements (EIS). This information is found in Appendix 1, pages 155 through 158 of the draft RMP. Preference on each individual allotment, either active or suspended, is shown in the table on pages 155 and 156, along with information on allotment management plans, base property, management category (management priority in response to resource values), and forage availability (perennial versus ephemeral). Preference will only change in response to monitoring data obtained from utilization and trend studies. This is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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Monitoring of water quality is a State of Arizona responsibility. It is the responsibility of each land owner to ensure that runoff or stream discharge from their lands meets quality standards set by the state. As the agency in charge of management of the public lands, BLM is responsible for maintaining the quality of water discharged from public rangelands.

We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

I believe it would be helpful for me to explain and define the Desired Plant Community (DPC) concept.

The Bureau of Land Management conducts ecological site inventories to identify ecological sites and the ecological status of the plant communities occurring on them. A particular ecological site may support several unique communities (seral communities), which may be relatively similar, or entirely dissimilar from the potential natural community (PNC), or climax stage of plant community development. At the same time, two seral communities in "early" or "mid" seral status may be as dissimilar to each other as they are to the PNC. Most importantly, these seral plant communities often differ markedly in their relative value for providing cover, habitat, forage, or other desired "products" identified in the land use plan.

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We want to continue to work closely with all individual permittees, the Kingman Grazing Advisory Board, Mohave Livestock Association, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

I hope this information will help you in preparing your specific comments on the Kingman draft RMP. If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

Bruce Ashjorn  
Acting Area Manager

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L-15



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
KINGMAN RESOURCE AREA  
2475 BEVERLY AVENUE  
KINGMAN, ARIZONA 86401



IN REPLY REFER TO:

1610  
025  
0490r

April 9, 1991

Jean Linn  
2130 Airway Avenue  
Kingman, Arizona  
86401

Dear Ms. Linn:

Thank you for your letter concerning our Kingman Resource Area draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate your willingness to participate in helping BLM to develop the best possible plan for managing the public lands in Mohave County for the next 20 years.

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Rangeland management actions proposed for the Preferred Alternative, Alternative 2, are summarized on pages 20, 21, and 43 of the draft RMP. Other than being site specific for the individual ACECs, these proposed management actions are "business as usual", as outlined in the grazing EISs.

Construction of new range improvements will follow schedules built into new and existing Allotment Management Plans (AMP). Maintenance of existing range improvements will continue to be the responsibility of the party deriving the primary benefit from the improvement, in accordance with BLM policy.

In general, the cost to construct improvements needed to implement land use plans, would probably be born by the federal government, when those projects are necessary to protect and improve natural resources enjoyed by the general public. Maintenance of projects which benefit livestock and allow the permittee to continue to graze livestock on the public lands, would continue to be the responsibility of the permittee. Improvements will be constructed as funding permits. Implementation of land use plans cannot create a burden on the federal government or the land user. This is only general information, given for the purpose of discussing your general questions. Specific decisions will be made at the time an AMP is developed on your allotment.

We will manage livestock grazing, and other uses, on the Wabayuma Peak Wilderness Area in accordance with the Arizona Desert Wilderness Act of 1990 and the Wilderness Act of 1964. We will work with you and other affected permittees to assist, and facilitate movement of livestock and maintenance of waters, fences, and other range improvements within the Wilderness Area. Following priorities set by management, an Allotment Management Plan (AMP) for your allotment, will be developed in consultation with you, in order to meet the objectives in the Hualapai-Aquarius Grazing Environmental Impact Statement, the approved RMP, and the wilderness legislation.

Your allotment does contain category II and III desert tortoise habitat and improvement and maintenance of this habitat will be a consideration in developing objectives for management of livestock grazing. However, the Walnut Creek allotment (0073) does not contain a proposed Area of Critical Environmental Concern (ACEC) for either desert tortoise or the Hualapai Mexican vole.

When an analysis of monitoring data indicates forage utilization exceeds the carrying capacity of forage plants, or if the pattern of utilization is unacceptable, the Area Manager must take action to prevent deterioration of rangeland resources. The manager has several options, depending on the cause(s) of overutilization, including (1) a change in livestock season of grazing, (2) rotation of grazing (including rest from grazing), (3) additional range improvements, (4) a reduction in livestock numbers, or (5) a reduction in big game animals. If, for example, the overutilization of forage is being caused by livestock and wildlife, the number of grazing animals would be reduced in proportion to the population of all such animals.

The number of each kind of grazing animal using the area would be determined through actual count, actual use data supplied by the livestock permittee, or census data provided by the Arizona Game and Fish Department (AGFD). The Area Manager would work with the livestock operator to affect his/her proportion of the total reduction, in a manner causing the least impact to their ranching operation. BLM would then recommend to AGFD that they affect their proportionate share of a reduction in wildlife populations, through the most appropriate methods available to the agency, i.e., hunting, transplant, etc. to achieve a total balanced reduction for the area.

We are presently conducting an Ecological Site Inventory throughout the resource area. Using this data, the Bureau will set objectives for desired plant communities. Changes in desired plant communities will be monitored along with the degree of forage utilization. This data will be analyzed and the results will be used to make livestock use adjustments in the future. Season of use, livestock preference, and pasture rotation may be affected on some allotments. Again, this is standard BLM policy, and is outlined in the grazing EISs and the draft RMP/EIS, with no changes.

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Page 3

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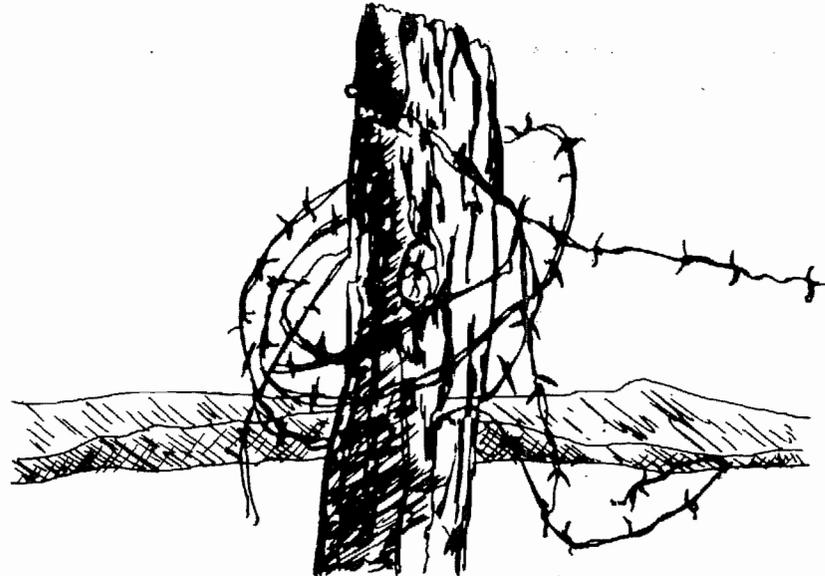
I hope this information will help you to understand the impacts an approved Kingman RMP might have on your specific livestock operation. We want to continue to work closely with you and all the other individual permittees, the Kingman Grazing Advisory Board, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and interested environmental groups to properly manage all uses, including livestock grazing, on the public rangelands in the Kingman Resource Area.

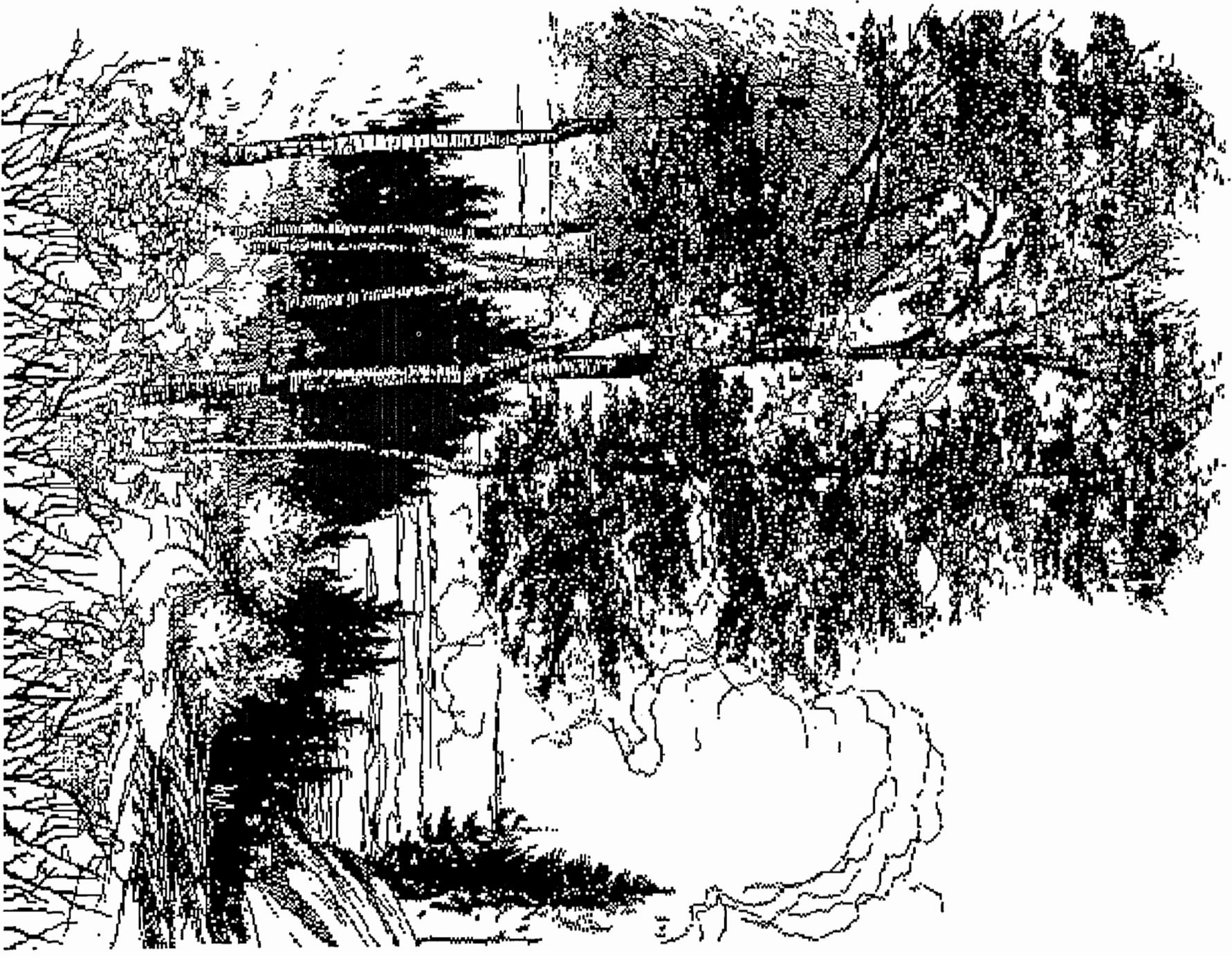
If you have any further questions please contact me, or any of our range conservationists, or Gordon Bentley, RMP Team Leader, at (602) 757-3161.

Sincerely,

/s/ JESSE J. JUEN  
Jesse J. Juen  
Assistant Area Manager

cc:  
Ken McReynolds







Substantial modifications have been made to the Appendices section of this document. Changes from the 1990 Draft Resource Management Plan are highlighted below. Unless otherwise noted, an appendix was not substantially altered.

#### APPENDIX CHANGES

1. Allotment Status and Summary of Rangeland Program
2. Cultural Resources Management Guidelines
3. **Alternative 1 Public Lands Identified for Disposal**
4. **Alternative 1 Recreation and Public Purposes Disposal Areas**
5. Alternative 1 Communication Sites
6. **Special Status Species**
7. Riparian Areas
8. Alternative 1 Legal Vehicular Access Acquisitions
9. Alternative 1 Resource Acquisitions
10. Alternative 2 Mineral Closure for Special Values
11. Alternative 2 Mineral Closure in Riparian Area
12. **Alternative 2 Proposed Disposal Area**
13. **Alternative 2 Lands Removal from Management Framework Plan Disposal Areas**
14. Public Lands in Coconino County
15. **Withdrawals and Classifications**
16. Public Water Reserves
17. **Alternatives 2 and 3 Proposed Recreation and Public Purposes Disposal Areas**
18. **Alternative 2 Designated Communication Sites**
19. **Allotments and Watershed Categories**
20. **Acquisitions for Resource Values**
21. Acquisitions for Regional Park and Wildlife Corridors
22. **Alternative 2 Acquisitions for Areas of Critical Environmental Concern**
23. **Alternative 2 Legal Vehicular Access Acquisitions**
24. **Alternative 2 Roads and Trails to be Improved**
25. **Alternative 3 Proposed New Disposal Areas**
26. **Alternative 3 Mineral Closures in Riparian Areas**
27. **Alternative 3 Acquisitions for Areas of Critical Environmental Concern**
28. **Mineral Potential Classification System**
29. **Production Totals by Mineral Districts**
30. **Management Framework Plan Decisions with Resource Management Plan Proposals**

Appendices 18 and 22 In the draft document were incorporated into Chapter 2 of this document. Appendix 27 from the draft was deleted. Appendix 30 in this document is new material.

