Introduction

The Safford District Resource Management Plan/ Environmental impact State ment was prepared by an interdisciplinary team of resource specialists from the Gila Resource Area, the San Simon Resource Area, and District Resources Staff. Writing the Resource Management Plan/Environmental Impact Statement began in September 1988 following a process beginning in 1987 that included a series of public scoping meetings, interagency coordination and the preparation of the management situation analyses. Coordination and consultation efforts have continued throughout the planning process.

Scoping and Public Participation

The District invited public participation throughout the development of this Resource Management Plan/ Environmental Impact Statement. The following list summarizes the actions taken.

September 1987 Mailout and news release advising public of intent to develop a plan and Environmental Impact Statement and to invite them into the process.

September 1987	Notice of Intent to Prepare the Saff ord District Resource Management Plan published in *Federal Register.*
Oct. 27 Nov. 5, 1987	Public scoping meetings held in Safford, Willcox, Bisbee, Tucson, Winkelman and Mesa, Arizona.
January 21, 1988	Scoping meeting with Arizona Game and Fish Dept.
February 12, 1988	Safford District Grazing Board briefing.
March 11, 1988	Safford District Advisory Council briefing.
April 1, 1988	Draft issues and concerns sent to public for review.
November 1988	Final issues and concerns sent to public.
December 1989	Draft Resource Management Plan/Environmental Impact Statement sent to public for comment.
February 1990	Public meetings held in Safford, Bisbee, Tucson and Winkelman.
September 1990	Safford District Advisory Council to review comment letters and responses.
December 1990	Safford District Grazing Board meeting.

In addition, BLM specialists have met with interested parties in the field and other locations. Consultations with Arizona Game and Fish Department, Arizona State Land Department, Forest Service and Soil Conservation Service to coordinate data collection, planned actions and to exchange information have taken place on a routine basis.

List of Agencies, Organizations and Persons to whom copies of this document have been sent

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
- Animal and Plant Health Inspection Service
- Forest Service
- Soil Conservation Service

Department of Defense
- US. Army Corps of Engineers
- U.S. Air Force

Department of Energy
Department of the Interior
- Bureau of Mines
- Bureau of Indian Affairs
- Bureau of Land Management, Phoenix District, Arizona
- Bureau of Land Management, Las Cruces District, New Mexico
- Bureau of Reclamation
- Fish and Wildlife Service (Ecological Services)
- Geological Survey
- National Park Service

Department of Transportation
- Federal Aviation Administration

Environmental Protection Agency

Arizona State Agencies

Arizona Commission of Agriculture and Horticulture
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 Game and Fish Department
Arizona Natural Heritage Program
Arizona Office of Economic Planning and Development
Arizona Oil and Gas Commission
Arizona Outdoor Recreation Coordinating Commission
Arizona State Clearinghouse
Arizona State Historic Preservation Off ice
Arizona State Land Commissioner
Arizona State Parks Board
Arizona State University
Arizona Water Resources Department
Bureau of Geology and Mineral Technology
Governor of Arizona
Governors Commission on Arizona Environment
Mineral Resource Department
Northern Arizona University
University of Arizona

New Mexico State Agencies

New Mexico State Historic Preservation Officer

Local Agencies

City of Benson
City of Bisbee
City of Clifton
City of Douglas
City of Duncan
City of Morenci
City of Safford
City of Sierra Vista
City of Tombstone
City of Willcox
City of Winkelman
Cochise County Board of Supervisors
Cochise County Planning and Zoning Department
Gila County Board of Supervisors
Gila County Planning and Zoning Department
Graham County Board of Supervisors
Graham County Planning and Zoning Department
Greenlee County Board of Supervisors
Greenlee County Planning and Zoning Department
Pinal County Board of Supervisors
Pinal County Planning and Zoning Department
Southeast Arizona Governments Organization

Indian Tribes and Councils

Ak-Chin (Maricopa) Papago
Gila River Pima Tribal Council
San Carlos Apache Tribal Council
Salt River Pima Tribal Council
Tohono O'odham (Papago) Tribal Council
White Mountain Apache Tribal Council

Other Organizations

Abel's Guiding and Outfitting
Alamo Ranch Company
American Motorcyclist Association
American Rivers
Aravaipa Homeowners Association
Arizona Archaeological Council
Arizona Cattlegrowers Association
Arizona Desert Bighorn Sheep Society
Arizona Desert Racing Association
Arizona Mining Association
Arizona Native Plant Society
Arizona Riparian Council
Arizona Small Miners and Prospectors Association
Arizona Trail Riders
Arizona Whitewater Expeditions
Arizona Wildlife Federation
ASARCO, Inc.
Bat Conservation international
Bella Vista Ranches, Ltd.
Bisbee Women's Action Group
Bob's Bargain Barn
BP Minerals America
Cochise-Graham County Cattlegrowers Association
Columbia Gas and Development Corporation
Cyprus Minerals Company
Defenders of Wildlife
Earth First!
El Paso Natural Gas Company
Friends of Arizona's Rivers
Gila River Tours
Graham County Electric Cooperative
Greater Arizona Bicycling Association
Greenlee County Cattlegrowers Association
Homestake Mining Company
Huachuca Audubon Society
Huachuca Hiking Club
J&J Cattle Company
Kennecott Exploration
Kerr-McGee Corporation
Magma Copper Company
Maricopa Audubon Society
McDonald Cattle Company
Missouri Department of Conservation
Muleshoe Ranch
Museum of Natural History, Univ. of II. Urbana-Champaign
National Audubon Society
National Off-Road Bicycle Association
National Parks and Conservation Association
National Public Lands Task Force
National Wildlife Federation
Natural History Museum of Los Angeles County
Natural Resource Defense Council
Nevada Outdoor Recreation Association

Northern Arizona Audubon
Oak Ranch
Pacific Western Land Company
Phelps Dodge Corporation
Pima Trails
Preserve America's Wolves
Public Service Company of New Mexico
Reevis Mountain School of Self Reliance
San Manual Arizona Railroad Company
Sierra Club
Sierra Cycles
Sierra Ready Mix
Sonoran Resources
Southern Arizona Hiking Club
Southwest Gas Company
Southwestern Research Station (American Museum of Natural History)
Sulphur Springs Valley Electric
Tenneco Arizona Property Corporation
The Amerind Foundation
The Desert Tortoise Council
The Nature Conservancy
The Wilderness Society
True Oil Company
Tucson 4-Wheelers
Tucson Audubon Society
Tucson Electric Power Company
Tucson Rod and Gun Club
Valley Telephone Cooperative, inc.
Whole Earth Adventures, Inc.
Wick Broadcasting, Inc.
X-X Partnership
ZR Hereford Ranch
Yuma Audubon Society

Elected Representatives

Federal

Representative Jim Kolbe
Representative Jon Kyl
Representative John Rhodes
Representative Bob Stump
Representative Morris K. Udall
Senator Dennis DeConcini
Senator John McCain

State

Representative Bart Baker
Representative Bill English
Representative Reuben Ortega
Representative Mike Palmer
Senator Gus Arzburger

List of Preparers

Al Alvarez, Realty Specialist, Gila Resource Area — has worked for BLM for 14 years and has a B.S. degree in Animal Science from the University of Arizona. Al was responsible for the Fire Management portion of the Draft Resource Management Plan/Environmental Impact Statement and for the Lands and Realty portion of the Final Resource Management Plan/Environmental Impact Statement.

Al Bammann, Wildlife Biologist, Gila Resource Area — has worked as a Raptor Research Biologist for BLM for six years, Wildlife Biologist for nine years. Al has B.S. and MS. degrees in Wildlife Biology from Humboldt State University. He is a member of the core team and developed the wildlife, riparian and Area of Critical Environmental Concern portions of the Resource Management Plan for the Gila Resource Area.

William Brandau, Supervisory Range Conservationist, Gila Resource Area — has worked for BLM 13 1/2 years. He received a B.S. degree in Recreation and Parks and an MS. degree in Range Management from Texas A & M University. Bill served on the core team.

Jerrold Coolidge, Assistant Team Leader, District Manager's Staff — has been with BLM 19 years. He has both a B.S. and M.S. in Botany from the University of Idaho. He wrote the Resource Management Plan/Environmental impact Statement and assisted in the direction of the planning team.

Olga Diaz, Editorial Clerk, Division of Administration — has 13 years experience with BLM. She attended Eastern Arizona College for three years and one year at the University of Arizona. Olga was responsible for word processing and editing.

Diane Drobka, Natural Resource Specialist, Gila Resource Area — has worked for BLM for nine years and for the Forest Service for one year. Diane has a B.S. in Wildlife Ecology from the University of Arizona. She provided many of the illustrations and photography for the document and was responsible for input for portions of the text for wildlife habitat in the Gila Resource Area.

James Gacey, Wildlife Biologist, San Simon Resource Area has 12 years experience with the Forest Service and over four years with BLM. Jim has a B.A., Biological Science degree from Northwest Nazarene College and an M.S. degree in Zoology from Arizona State University. He developed the wildlife portion of the Resource Management Plan for the San Simon Resource Area.

Darlene Haegele, Realty Specialist, San Simon Resource Area — has 11 years experience with BLM, four of which have been as a Realty Specialist. Darlene attended the University of Utah. She prepared the lands and realty portions of the Resource Management Plan for the San Simon Resource Area.

John Herron, Archaeologist, San Simon Resource Area — has four years experience with BLM and worked at the Museum of Northern Arizona for two years. John has B.A. degree in Archaeology from the University of Arizona. He developed the archaeology and paleontology parts of the draft plan for the San Simon Resource Area.

Larry Humphrey, Natural Resource Specialist, San Simon Resource Area — has worked three years for Soil Conservation Service and 17 years for BLM. Larry has a B.S. degree in Animal Science from the University of Arizona. He served on the core team and developed the soils, watershed and vegetation parts of the Resource Management Plan/Environmental Impact Statement.

Steve Knox, Team Leader, Division of Resource Management — has worked for BLM for 14 years. Steve has a B.S. degree in Watershed Management from the University of Arizona. He directed development of the Resource Management Plan.

Roland Loomis, Mining Engineer, Division of Resource Management — has worked for BLM for 13 years. He received a B.S. in Engineering from the U.S. Coast Guard Academy and from the University of Arizona. Ron provided geological and minerals input to the draft.

Kathy McQuestion, Archaeologist, San Simon Resource Area — has five and a half years experience as an archaeologist with BLM. Kathy has a B.A. degree from the University of Wisconsin-La Crosse in Anthropology. She has done graduate work in Archaeology at Eastern New Mexico University and the University of Utah. Kathy developed the archaeology and paleontology sections of the draft plan for the San Simon Resource Area.

Kenneth Mahoney, Outdoor Recreation Planner, Gila Resource Area — has worked 11 years for BLM. Ken has a B.S. degree in Leisure Studies from the University of Utah. He prepared the recreation, visual resources, wilderness and wild and scenic rivers portions of the draft plan for the Gila Resource Area.

Randy Massey, Realty Specialist, Gila Resource Area — has worked for BLM for a total of 14 1/2 years, 11 1/2 as a range conservationist and three years as a realty specialist. Randy attended Brigham Young University, graduating with a B.S. degree in Range Science. He developed the lands and realty portions of the draft plan for the Gila Resource Area.

Greg Merchant, GIS Specialist, Division of Administration -has worked for over six years for BLM as a range technician and as a computer (GIS) technician. Greg attended the University of Nevada-Las Vegas, Northeast Nevada Community College and Eastern Arizona College. He provided GIS support for the entire plan.

Delbert Molitor, Hydrologist, Division of Resource Management — has worked seven years for the Forest and Range Experimental Station in Boise, Idaho and 12 years for BLM. Del has a B.S. degree in Hydrology from Utah State University. He provided hydrologic and air quality input for the water resources, watershed and air quality portions of the plan.

Robert Pascoe, District Engineer, Division of Operations — has worked for BLM for over five years and has had four years experience in private industry in mining operations. Bob has a B.S. degree in Mining Engineering from the University of Arizona. He provided input to the minerals portions of the draft plan.

Sandra Phillips, Legal Clerk, Division of Resource Management — has worked for BLM for 12 years. Sandy received an AAS degree in Office Services from Eastern Arizona College. She was responsible for word processing and editing.

Elaine Rowley, Accounting Technician, Division of Administration — has 19 years experience with BLM. Elaine was awarded an AA degree in General Education from Eastern Arizona College. She also attended Northern Arizona University and Arizona State University. Elaine was responsible for word processing and editing.

Darrell Sanders, Archaeologist, Gila Resource Area — has five years experience with BLM and two years with the Forest Service. Darrell was awarded a B.A. degree in Anthropology from California State University at Chico and has completed the classroom requirements for an M.A. in Anthropology from the same university. He also attended Medocino Community College and the University of Nevada-Las Vegas. He developed the archaeological and paleontological portions of the plan.

Tom Schnell, Outdoor Recreation Planner, San Simon Resource Area — has worked for BLM for three years. Tom received a B.S. degree in Resource Management from University of Wisconsin-Stevens Point. He provided recreation, visual resources, wild and scenic rivers and wilderness input to the document for the San Simon Resource Area.

Deb Smith, Outdoor Recreation Planner, Gila Resource Area — has worked for BLM for five years. Received a B.S. degree in Recreation Administration from the University of Idaho. She provided recreation, visual resources, wild and scenic rivers and wilderness input for the Gila Resource Area.

Larry Thrasher, Geologist, Division of Resources — has worked for BLM for four years. Larry received a B.S. degree in Geology from the University of Maryland and an MS. degree in Geology from the University of North Dakota. He provided geological, minerals and energy input.

Pete Zwaneveld, Outdoor Recreation Planner, San Simon Resource Area — has worked for the National Park Service and nearly 12 years for BLM. Pete has a B.S. degree in Outdoor Recreation from Utah State University. He developed the recreation, Areas of Critical Environmental Concern, wilderness, wild and scenic rivers and visual resources portions for the San Simon Resource Area.

Saff ord District Off ice Assistance

John Augsberger, Wildlife Biologist
Ray Brady, District Manager
Meg Jensen, Gila Resource Area Manager
Gay Kinkade, Archaeologist
Lynn Saline, San Simon Resource Area Manager
Tom Terry, Realty Specialist

Arizona State Off ice Assistance

Bob Archibald, Realty Specialist
Beverly Ashbrook, Cartographic Technician
Sue Richardson, Wilderness
Eugene Dahlem, Wildlife Biologist
Mike Fisher, Fire Management Officer
Jim Renthal, Hydrologist
Steve Meszaros, Cartographic Technician
Keith Pearson, Planning and Environmental Coordinator
Alan Rabinoff, Geologist
George Ramey, Range Conservationist
Sue Richardson, Wilderness
Gary Stumpf, Archaeologist
Larry Taddia, Supervisory Cartographic Technician
Bruce Talbot, Outdoor Recreation Planner

Public Comments and Responses

Public comments were received from the following individuals, organizations, agencies or companies. They are displayed in two formats, the first being in the order of receipt and the second in an alpha-numeric arrangement.

Public Comment Register

The following is a list of the public comment letters in the order of receipt. *Denotes a response was made to letter.

*1. Bailey, Rex
*2. State Historic Preservation Officer
3. Southern Arizona Guides and Outfitters Association
*4. Bureau of Mines
*5. Holladay, Bobbie
*6. Serafine, Ellen and John Brumage
7. Klump, Wayne D.
8. Lazaroff, Cheryl S.
*9. Aravaipa Property Owners Association
*10. Owens, Rex
11. Notestine, Jim
*12. Preserve Arizona's Wolves
13. Tucson Rod and Gun Club
*14. San Carlos Apache Tribe
15. Escott, Carol
16. Tetreault, Rheal
17. Curry, L.B.
18. Stevenson, Mark
19. Cabin, Sue Wallace
*20. Patrick, Vernon W.
21. Martin, Ronald P.
22. Iser, Jerry
23. Newton, Lola T.
24. Zinsli, Gabriel
25. Frye, Harry D.
26. Huston, Jack V.
27. Drown, Julie
28. Carter, Frances C.
29. Coleman, Kristen
30. Necker, William C.
31. Stevenson, Dorothy
32. Creeden, Sharon
33. Zaukas, Helen
34. Ritch, June K.
35. Schramm, Marian
36. Tilsch, John W.
37. Juhasz, Andrew J.
38. Fritz, William D.
39. Calder, Dr. William A.

40. Pelech, Walter and Dorothy
41. McCauley, William J.
42. Schwab, Robert G.
43. Furniss, W. Todd
44. Pfaff, Kenneth
45. Foster, Milton P.
46. Ackerman, T.R.
'47. San Carlos Apache Tribe
48. Ayers, Daniel D.
49. Partin, Margery and Marvin
50. Klump, Wayne
'51. The Nature Conservancy New Mexico
*52. The Warne Company
53. Hayward, Bruce J.
54. Kuihen, Helen S.
55. Dow, Jane
56. Lund, Robert E.
57. McMurray, William J.
58.
59. Bowie Chamber of Commerce
60. Buchsbaum, Robert
*61. Alder, Rodney
62. Ferguson, Ray
*63. Knostman, R.W.
*64. Wolf, Jack
65. Kole, Marion
*66. Notestine, Jim
67. Miller, Dorothy and Jack
*68. Schanz, Mary C.
69. Safford District Grazing Advisory Board
70. Arizona Department of Environmental Quality
71. Lambrechtse, Rudi
72. Janis, June and Harry
73. Shafer, Winifred J.
*74. Swanson, John R.
75. National Speleological Society
*76. National Museum of Natural History
77. Poulos, Bonnie
78. Foster, Catherine L.
79. Uhl, Louise S. and John H.
*80. Mayercek, Daniel R.
81. Petition signed by 21 people
82. Fischer, Dan
*83. Arizona Earth First
84. Hollender, Tom
85. Siwek, Erwin
*86. Sidner, Ronnie
87. Pamperin, John
88. Denver Wildlife Research Center
*89. Pima Trails Association
90. Sidner, Ronnie
*91. GSA Resources, Inc.
92. Taylor, Thomas J.
*93. California Department of Health Services
94. Arizona Department of Environmental Quality
95. Hoffmeister, Donald F.
*96. Pima Trails Association
*97. Geldmacher, Don and Bev
*98. Werner, Frances W.
99. Fish and Wildlife Service
*100. Fish and Wildlife Service
101. Gasser, Margaret E.
*102. Van Gasse, Jerry
*103. Whole Earth Adventures
104. Gila River Tours
● 1 05. Davis, Russell
106. Arizona Trail Riders
107. Straley, P.E.
108. Bell, L. Stephen
109. Vetault, Sarah C. and Robert E.
*110. d'Orgeix, Alva
*1 11. Phelps Dodge Mining, Inc.
*112. American Rivers
*113. The Desert Tortoise Council
114. Petition signed by 7 people
115. McDonald, Pratima
*116. Meyer, Francie and Walter
*117. Bagnara, Joseph T.
*118. Indiana Bat/Gray Bat Recovery Team
*119. Rodda, Gordon
*120. Bureau of Reclamation
121. Graham County Board of Supervisors
122. Petition signed by 21 people
123. San Carlos Apache Tribe
● 124. Huachuca Audubon Society
*125. Cox, Kenneth D. Sr.
126. Cochise-Graham Cattle Growers Association
*127. Pamperin, John
128. Wuerthner, George
*129. Maricopa Audubon Society
*130. DeNormandie, Phillip Y.
*131. Rolls, Judi
*132. Arizona Desert Bighorn Sheep Society, Inc.
133. Bat Conservation International, Inc.
134. Atlee, William S.
● 135. Bisbee Women's Action Group
136. Pressel, Douglas
137. Frey, Don
138. Fish, Cathe'
139. Burgess, Jeff
140. Ciaramitaro, Mr. and Mrs. Joseph
● 141 . Heiser, Noel
*142. Pokorny, Martin
*143. Beckel, Bettina
*144. Schell, Amy E.
*145. Daily, Kathy
● 146. Friends of Arizona Rivers
*147. Fischer, Dan
● 148. Pamperin, John
● 149. Hage, Mary Jean
● 150. Flood, Timothy J.
151. Platts, Geoffry
● 152. San Carlos Apache Tribe
*153. Coronado National Forest

154. Fonseca, Julia
*155. Williams, Steven M.
*156. Sierra Club
157. Los Angeles Natural History Museum
158. Levick, Lainie
159. Walsh, Jim
160. Kagan, Randy S.
*161. Adams, Larry D. and Frances Werner
*162. Environmental Protection Agency
*163. The Arizona Native Plant Society
*164. Menges, Jeff
*165. Leupke, John and Norma Tapia
*166. Arizona Cattlegrowers Association
*167. Tucson Rod and Gun Club
166. Brown, Matthew R.
169. Williams, Caryl Mary
170. Woodin, Elizabeth T.
*171. El Paso Natural Gas Company
172. The Arizona Nature Conservancy
*173. The Wildlife Society
*174. Arizona Game and Fish Department
175. Wells, Linda K.

This second list is alpha-numeric.

46. Ackerman, T.R.
*161. Adams, Larry D. and Frances Werner
*61. Alder, Rodney
112. American Rivers
*9. Aravaipa Property Owners Assocociation
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72. Janis, June and Harry
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160. Kagan, Randy S.
50. Klump, Wayne
7. Klump, Wayne D.
*63. Knostman, R.W.
65. Kole, Marion
54. Kuihen, Helen S.
71. Lambrechtse, Rudi
a. Lazaroff, Cheryl S.
165. Leupke, John and Norma Tapia
158. Levick, Lainie

157. Los Angeles Natural History Museum
56. Lund, Robert E.
*129. Maricopa Audubon Society
*21. Martin, Ronald P.
*80. Mayercek, Daniel R.
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*164. Menges, Jeff
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*11. Notestine, Jim
'66. Notestine, Jim
*10. Owens, Rex
*127. Pamperin, John
*148. Pamperin, John
87. Pamperin, John
49. Partin, Margery and Marvin
'20. Patrick, Vernon W.
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122. Petition signed by 21 people
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114. Petition signed by 7 people
44. Pfaff, Kenneth
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'96. Pima Trails Association
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*142. Pokorny, Martin
77. Poulos, Bonnie
'12. Preserve Arizona's Wolves
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*119. Rodda, Gordon
*131. Rolls, Judi
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*144. Schell, Amy E.
35. Schramm, Marian
42. Schwab, Robert G.
*6. Serafine, Ellen and John Brumage
73. Shafer, Winifred J.
86. Sidner, Ronnie
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92. Taylor, Thomas J.
16. Tetreault, Rheal
*163. The Arizona Native Plant Society
*172. The Arizona Nature Conservancy
*113. The Desert Tortoise Council
*51. The Nature Conservancy New Mexico
*52. The Warne Company
*173. The Wildlife Society
36. Tilsch, John W.
58. Triplett, DeWayne
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*167. Tucson Rod and Gun Club
79. Uhl, Louise S. and John H.
*102. Van Gasse, Jerry
109. Vetault, Sarah C. and Robert E.
159. Walsh, Jim
175. Wells, Linda K.
'98. Werner, Frances W.
*103. Whole Earth Adventures
169. Williams, Caryl Mary
*155. Williams, Steven M.
64. Wolf, Jack
*170. Woodin, Elizabeth T.

1

(April 1984)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LARD MANAGEMENT

RECORD OF PUBLIC PARTICIPATION IN THE PLANNING PROCESS

Plan Name: Safford District RMP

Date of Contract: 1-4-90

Name(s) of Individual(s) or Group(s): Rex Bailey

Location of Contract: Safford D.O.

Bureau Interviewer(s) or Moderator(s): Al Bammann

INTERVAL OF PUBLIC INVOLVEMENT

- [ ] Phase I – Review Schedule and Projected New Starts
- [ ] Phase II – Scoping to Guide Planning (Issue Identification. Planning Criteria, Information)
- [x] Phase III – Review of Draft Plan and Draft Environmental Impact Statement
- [ ] Phase IV – Review of Management from Protests and Governor Review
- [ ] Phase V – Review of Plan Use and Implementation

TYPE OF PUBLIC PARTICIPATION (CHECK AS MANY AS APPLICABLE)

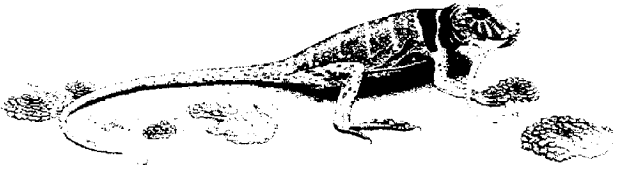
- [x] Individual Contact
- [ ] Small Group Discussion
- [ ] Public Meeting
- [ ] Written Statements or surveys
- [ ] Other (specify)

Summarize briefly public input. (Use additional sheets if necessary. Attach worksheets, rosters, press releases, etc. as appropriate.)

1-1 He was in the office to coordinate volunteer activity and said he'd seen an area open to wood cutting in the middle of the San Simon and wanted to know how we could justify cutting out there. I explained that it would be allowed as part of a revegetation effort - the soils were stable and we thought we could get better vegetation - grasses - to come in. He was concerned about the impact to wildlife

Prepared by: A Bammann

Date: 1-4-90



2

ARIZONA STATE PARKS

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

ROSE MOFFORD
GOVERNOR

STATE PARKS BOARD MEMBERS

JONI BOSH
CHAIR
PHOENIX

WILLIAM G. ROE
VICE CHAIR
TUCSON

RONALD PIES
SECRETARY
TEMPE

DEAN M. FLAKE
SNOWFLAKE

DUANE MILLER
SEDONA

ELIZABETH TEA
DUNCAN

M. JEAN HASSELL
STATE LAND COMMISSIONER

KENNETH E. TRAVOUS
EXECUTIVE DIRECTOR

COURTLAND NELSON
DEPUTY DIRECTOR

Frank Rowley
Acting District Manager
Bureau of
Safford District Office
425
Safford, A2 85546

RE: Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS), DOI-BLM

Dear Mr. Rowley:

I have reviewed the referenced above and am submitting the following comments pursuant to Section 110 of the National Historic Preservation Act:

1. Regarding cultural resources. all four alternatives (Alternatives A through D) are similar lo the extent will in high impacts to 37 archaeological sites in localities of proposed dam construction and repair. most notably construction of me Turkey Draw Dam. The states that the Bureau of Land Management is committed to developing measures to mitigate me effects of such undertakings on properties determined eligible for the National Register of Historic Places

2. The sections describing specific cultural resources management actions under each of the alternatives are excellent. They are clearly written and reflect extremely responsible stewardship on the part of the BLM.

3. The tour alternatives differ with respect to specific actions will undertake to preserve or otherwise enhance cultural resources. In Alternative A offers program for cultural resources; for Alternative A is our "Preferred Alternative"

2-1 4 We would like to suggest that you add to Alternative A one of the actions proposed under Alternative mar the BLM nominate a, leas, six eligible in the to Register of Historic Places within me lifespan of me Resource Management Plan. Presently, Alternative A demonstrates no clear commitment to the nomination to the National Register. By placing eligible properties on the Register. me BLM would resources in an advantageous position lo receive enhancement funds. should such funds be available in the future and restricted to Register-*listed* properties.

Thank you for providing us the opportunity to comment on this resource management plan/environmental impact Statement draft. Your in complying with the provisions of the National Historic Preservation Act is appreciated

Sincerely,

Pa, H. Stein
Preservation Planner

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

3

Southern Arizona Guides and Outfitters Rssociation

"Outdoor Adventures bg

1/26/90

Steve Knox, RMP Team Leader
BLM
425 E 4th St.
Safford, Ariz. 85546

Dear Steve,

After reviewing your "Resource Management Plan", I would like to make my comments in a general sense.

I am in favor of all your larger alternatives as to wilderness proposals. There are plenty of places to go in a vehicle if someone desires and these lands you designated need future protection.

After spending many years on the Kulenkae, which has not been grazed for years, I must admit I fall into the group that would rather see indigenous wildlife on BLM lands rather than cattle. Much of the land administered by the BLM that is grazed, looks like hell and I think you know it. The time has come to respond to the public demand for less cows and less degradation of our land.

2534 N. Treat Ave.. Tucson. Arizona 85716 . 602-325-4166

2

Southern Arizona Guides and Outfitters Rssociation

"Outdoor Adventures bg True Professionals"

If any fee increases or cattle reductions are in your plan, then I am for these proposals.

Hope I've been of some help.

Yours,

Gary Abel, President

2534 N. Treat Ave. • Tucson, Arizona 85716 • 602-325-4166

4

United States Department of the Interior

BUREAU OF MINES

P. O.
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

February

Memorandum

To: Mr. Steve Knox. RMP team Leader. Bureau of Land Management. Safford District Office, 424 E. Fourth Street. Safford. Arizona 85546

From: Chief. Intermountain Field Operations Center

Subject: Review of Draft Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS)

Personnel of the Bureau of Mines, Intermountain Field Operations Center, reviewed the subject draft Safford District Resource Management Plan and Environmental Impact Statement as requested by Frank Rowley. District Manager.

4-1 The draft is fairly complete concerning minerals within the Safford District; however, the Bureau of Mines (BOM) believes that a gold deposit at the Table Mountain Mine area. near the Table Mountain RNA ACEC, has not been adequately considered. In 1989. BOM personnel identified a portion of the Table Mountain RNA ACEC as having geologic conditions favorable for occurrences of base and Precious metals. The Table Mountain nine is on two patented mining claims within sections 15 and 22. T. 7 S., R. 18 E. We identified a subeconomic resource of at least 35.500 short tons of jasperoid breccia averaging 0.034 oz gold/st at the mine. The jasperoid breccia which hosts the gold mineralization extends into the Table Mountain RNA AEC. Closing mineral entry to this area would affect future exploration and possible development of this deposit. Also. the two patented claims do not show up as private land on any of the maps in the draft.

We believe that alternative have the least effect on future minerals exploration and development. The Stafford District is an area where world-class copper deposits occur. There is the possibility that other yet-undiscovered world-class deposits exist within the district and that the document should discuss that possibility. We suggest careful Planning be done so that future deposits will not be closed to mineral entry and thereby deny future exploration and development. It is encouraging to see evidence that BOM input on minerals appears to have helped land-planners determine boundaries in the Aravaipa and Mule Shoe study area additions.

William Cochran

5

February 5. 1990

John Augsburger
District Biologist
BLM - Safford District
425 East 4th St.
Safford, A2 85546

Dear John,

I tried contacting you by phone but I guess you never received my message. I will be unable to attend the February 13 meeting dealing with the RMP but had some concerns I warded to express I just received me copy of me RMP so have not bad an opportunity to review it. My questions may be answered in that document.

I am me Founder Director of preserve Arizona's Wolves (P.A.WS.) a coalition of citizens working for me preservation and eventually me reintroduction of the Mexican wolf. We work closely with me Arizona Game and Fish Department and me U. S. Fish and Wildlife Service in following me Mexican Wolf Recovery Plan. At the present time our prime focus is on public education and as you may have heard we are presenting a major symposium on March 23 and 24 at ASU entitled Arizona Wolf Symposium '90. See enclosed flier

5-1 Because me Safford District includes lands within me former range of me Mexican wolf (*Canis lupus baileyi*) it is possible in me future mat certain lands might be considered as potential reintroduction sites. My question is, doss me RMP take into consideration management of habitat and prey to enable a recovery program to take place? Naturally, me main prey base would be deer with me addition of rabbits and smaller rodents. Naturally, the ideal site would have a minimum of conflict from livestock operations There are still some fairly remote, pristine areas from which unsubstantiated reports of wolf sitings occur Whether these are large coyotes, escaped wolf-dogs or actually Mexican wolves mat may range up from Mexico remains to be determined.

Please let me know what plans, if any, are in progress to provide for a future reintroduction of this endangered species

Thank you,

Bobbie Holaday

Bobbie Holaday, Founder Director
1413 East Dobbins Rd.
Phoenix, Arizona 85040

(602) 268-1089

6

Ellen Serafini and John Brumage
ZEKE'S GENERAL STORE
CENTRAL, ARIZONA 85531

(602) 428-4426

February 12. 1990

BUREAU OF LAND MANAGEMENT
SAFFORD DISTRICT
425 East Fourth Street
Safford, A Z 85546

Gentlepersons:

This letter is to comment on the management plan for the Safford District. One of the objectives of the plan is to improve assess to B:LM lands by the public. We feel that this is a very important goal, for, although we cannot all mine copper or range cattle, everyone can go out and enjoy nature.

Unfortunately, many of the private interests to whom government lands have been leased are attempting to restrict public passage through their lands.

6-1 We therefore suggest that the BLM, as a REQUIREMENT for the leasing of public land, or the granting of an easement roads through public land, demand that that the public be permitted to pass freely across any connecting roads in order to make "se of BLM areas.

In order for the public to be informed, the ELM should post all roads entering public land. When the road passes through private the signs should read:

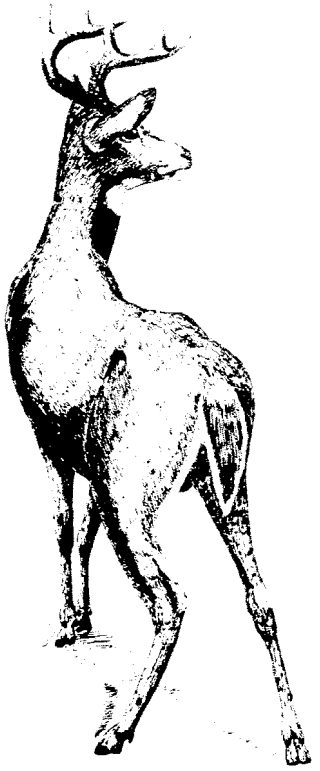
BLM ACCESS ROAD
passing through
PRIVATE LAND
next .5 miles
do not leave road

Of course this is just an idea for the wording. but the abusive sign posted by the BRYCE cattle co. 'Private Property, gate may be locked at any time" is just an example of how the public is being excluded from our own land

Thank you for your attention to this matter.

Yours Truly,

Zeke's General Store



7

PROTEST

We protest the Safford District Resource Management Plan and Environmental Impact Statement, in its entirety and intent.

The intent of the Government and Bureau of Land Management is to manage, control, steal, acquire, and take our Private Property.

We Protest the Governments power and so called legal avenues to propagandize, brainwash, manipulate, control, manage, steal, take away, and acquire our Property and Rights.

We protest the creation of Javelina Peak, Peloncillo Mtns., and Dos Cabezas Mtns., Wilderness Areas, as all three are within our ranch and would cause an undue hardship on us, and adversely effect our lives and livelihood.

This is to serve notice on the Government or anyone that might turn loose or plant any Animal or Preditor within a 500 mile radius of Bowie, Arizona, That they are responsible and liable for any and all damages that said Animal or Preditor might do.

All thru the RMP/EIS, the B. L. M. plans to acquire or steal Private Property and access across Private Property in Coch ise and Graham County.

This is to serve notice on the Government and B. L. M. that we own a big portion of this area, and h ave Grandfathered Rights since 1880.

We OBJECT vehemently to the Government taking away our property and Rights.

Wayne D Klump 2/8/90

Klump Bros. by Wayne D. Klump Date
Box 316, Bowie, Arizona 85605

State of Arizona, County of Cochise
Subscribed and sworn to before me on this
8th Day of February 1990

Notary Public

Notary Expiration Date June 6, 1993

FEB 09 1990 11AM E 2
5.00

CLAIM

The Klumps claim the following describ ed real property in Cochise County Arizona in its entirity .

All of Sections 1,12,13,14,15,16,22,23,24,25,26,35,36 S½ Sec.8; S½Sec.9; S½Sec.10; S½Sec.11; SE¼Sec.17; E½NE¼Sec.21; N½, SE¼Sec.27; NW¼, N½SW¼Sec.34;
All in T.13S. R.31E.
All of T.13S. R.32E.
All of S½, 2,3,4,5,6,7,8,9,10,16; S.P.R.R. R.O.W.
E½Sec.32; W½Sec.35; All in T12S. R.32E.
All of Sec. 2,3,4,5,6,7,8,9,10,16; N½Sec.18,
N½Sec.21, All in T.14S. R27E.
All of Sec. 1,12,15,16,17,20,21,22,28,29,32,33, N½,N½S½Sec.13;N½Sec.14;
S½, E½NE¼ Sec.11; SW¼Sec.23; W½, W½NE¼Sec.34; S½S½Sec.30; NW¼, N½SW¼,
N½NW¼Sec.31 All in T.14S. R.26E.
All of T.13S. R27E.
All of T.12S. R27E.
All of Sec. 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,20,21,22,23,24,25,26,27,
28,34,35,36, N½, SE¼Sec.19; N½NE¼, SE¼NE¼Sec.29; N½Sec.33; All in T.13S. R26E.
All of Sec. 31,32,33,34,35,36, S. of S.P.R.R. R.O.W. All in T.12S. R26E.
All of Sec.36 S. of S.P.R.R. R.O.W. in T12S. R25E.
All of Sec. 1,12,23,26,27,33,34,35, All of Sec. 2 S. of S.P.R.R. R.O.W.;
N½Sec.11; S½Sec.14; S½S½Sec.13; S½, NW¼, S½NE¼Sec.24; E½, E½W½, SW¼NW¼Sec.22;
S½, S½N½Sec.28; SE¼Sec.29; E½NW¼, S½NE¼,N½SE¼,SE¼SW¼Sec.32 All in T13S. R25E.
N½NW¼, NW¼NE¼, SW¼NW¼Sec.3; NW¼Sec. 4; N½W¼, E½NW¼, N½E½W¼, SW¼SW¼Sec. 5;
SE¼SW¼Sec.6 All in T14S. R.25E.
All of Sec. 1,3,6,7,8,9,10,18,19,30,31, S½, NE¼Sec.2; W½Sec.4; E½Sec.5; N½Sec.11;
N½Sec.12; SE¼,SE¼NE¼, S½SW¼Sec.13; NW¼, N½NE¼Sec.16; S½NW¼Sec.17; SW¼Sec.20;
N½, SE¼Sec.24; W½Sec.29; NW¼Sec.32 All in T.12S. R.28E.
All of Sec. 22,26,27,35, E½Sec.21; E½Sec28; S½Sec. 32; W½, W½E½Sec.33;
S½Sec.23 All in T.12S. R.32E.
SEE NEXT PAGE
SE¼Sec.19; SW¼Sec.20; all of Sec.29,30, All in T.14S. R.28E.
All of Sec. 18,30; N½ Sec.19 All in T12S. R.29E.
W½Sec.6; SW¼,W½SE¼Sec.5; W½, NW¼NE¼Sec.8; E½SW¼, SW¼SE¼Sec.10; SW¼, S½SE¼Sec.11;
S½SW¼Sec.12; NE¼NW¼, SE¼SW¼Sec.14; NW¼, SW¼, NE¼ Sec.15; N½Sec.25; S½Sec.27; All
of Sec. 34; SW¼, S½NE¼Sec.35; SW¼, S½SE¼NE¼Sec.36 All in T.13S. R28E.
N½, N½SW¼Sec.10; W½Sec.17; N½, N½N½, S½N½, E½NE¼, E½SW¼NE¼Sec.18; NW¼, SW¼,
S½NE¼, N½SW¼Sec.19; NE¼Sec.21; S½SE¼Sec.25; S½Sec.26; S½NW¼Sec.27; S½Sec.28;
NE¼, E½NW¼, N½NW¼, NE¼SW¼Sec.29; W½, W½E½, E½SE¼, S½NE¼E½Sec.30; All of Sec.31,
33,35,36; N½, SW¼Sec.34 All in T.13S. R.29E.
All of Sec. 5,6,7,12,13,14,15,20,21, W½Sec.11; S½, NW¼Sec.16; E½, N½NW¼Sec.17;
E½E½Sec.19; NE¼Sec.30; N½Sec.29 AllinT.14S. R.29E.
S½Sec.6; All of Sec.7,18, All in T14S. R30E.

900202570
OFFICIAL RECORDS
DATE 02/09/90 HOUR 11
OF
REQUEST
KLUMP, WAYNE
CHRISTINE RHODES-RECORDER
FEE : 9.00 PAGES : 2

900202570

CLAIM page 2

Our claim and rights date back to 1880 (Eighteen hundred eighty) and are legally acquired and grandfath ered. We claim this property as our private property. We claim all minerals, coal, oil, gas, water, geothermal, gravel, and all known and all unknown substances to the center of the earth. We claim the air, air space, water, gasses, all living things, all dead things, and any and all substances to th e heavens and beyond. We claim the right to store and use any and all substances on, above, and under said lands.
We declare that this land is outside of any government or governmental agencys control or jurisdiction. Th e government , city, local, county, state, or federal sh all h ave no claim whatsoever to any of the above described property. This Land shall not be subject to eminent domain, taking, seizure, steal, or whatever name or method that the government might use to take our property away. Legal access shall be on a temporary and lease basis only.
There shall be no h unting, fishing, trapping, or trespassing without prior written permission. Klumps shall not be liable or responsible for damages to anyone. We base our claim on continuous and uninterrupted use , and the intent of th e Constitution of the United States of America and the homestead act was to put all lands into private ownership.

W. Klump
W. KLUMP

State of Arizona, County of Cochise
Subscribed and sworn to before me this
8th day of February 1990
Notary Public
Notary Expiration Date June 6, 1993

900202570

FEB 09 1990 11AM E 2
5.00

PROTEST

We protest the Safford District Resource Management Plan and Environmental Impact Statement, in its entirety and intent.
The intent of the Government and Bureau of Land Management is to manage, control, steal, acquire, and take our Private Property.
We Protest the Governments power and so called legal avenues to propagandize, brainwash, manipulate, control, manage, steal, take away, and acquire our Property and Rights.
We protest the creation of Javelina Peak, Peloncillo Mtns., and Dos Cabezas Mtns., Wilderness Areas, as all three are within our ranch and would cause an undue hardship on us, and adversely effect our lives and livelihood.
This is to serve notice on the Government or anyone that might turn loose or plant any Animal or Freditor within a 500 mile radius of Bowie, Arizona, That they are responsible and liable for any and all damages that said Animal or Freditor might do.
All thru the RMP/EIS, the B. L. M. plans to acquire or steal Private Property and access across Private Property in Coch ise and Graham County.
This is to serve notice on the Government and B. L. M. that we own a big portion of this area, and h ave Grandfathered Rights since 1880.
We OBJECT vehemently to the Government taking away our property and Rights.

Wayne D Klump 2/8/90
Klump Bros. by Wayne D. Klump Date
Box 316, Bowie, Arizona 85605

State of Arizona, County of Cochise
Subscribed and sworn to before me this
8th Day of February 1990
Notary Public
Notary Expiration Date June 6, 1993

FEE # 900202571
OFFICIAL RECORDS
COCHISE COUNTY
DATE HOUR
02/09/90 11
REQUEST OF
KLUMP, WAYNE
CHRISTINE RHODES-RECORDER
FEE : 9.00 PAGES : 1

900202571

8

Draft Safford District Resource Management Plan

Public Comment Form

Issue/Management Concern: Issue 2 (ACEC), 3 + 4

Comment: I support your designation of several ACEC's in the Safford District and your efforts to protect T+E species. Please continue to preserve + improve as many large areas of habitat as you can.

Riparian areas must have cattle excluded to preserve/replace riparian vegetation. Riparian areas/washes are unsuitable for gravel pits.

As for ORV's - please confine them to established roads + do not allow any entry to threatened areas. Tortoises and other wildlife/plants cannot tolerate ORV use.

Congratulations on your recognition of + protection for paleontological / archeological resources

Name: Cheryl S. Lazaroff

Representing:

Address: 5942 E Waverly Pl.
Tucson AZ 85712

Date: 2-14-90

9

ARAVAIPA PROPERTY INC.

February 12, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E.
Safford, AZ 85546

RE: BLM DRAFT PLAN FOR THE SAFFORD DISTRICT

Dear Mr. Knox:

The Aravaipa Property Owners Association (APOA) appreciates the opportunity to review and comment on the BLM Resource Management Plan (RMP) for the Safford District. The plan obviously represents a tremendous amount of work, and our membership applauds the BLM for the increasing awareness of environmental conservation reflected in most of the plan objectives.

APOA members agree, however, that certain proposed BLM actions will erode, rather than maintain, environmental integrity and conservation in Aravaipa Canyon.

APOA'S major concerns are the proposals in alternatives A, B, and C to open for public access; Oak Spring Canyon Road, Whittaker Ranch Road, Wagner Ranch Road, and Wood Ranch Road.

Aravaipa Canyon and its approaches are an extremely fragile environment. APOA members feel that the road openings would have a highly negative impact on the entire area. These and other specific APOA concerns are appended to this letter.

APOA members **STRONGLY OPPOSE** opening Oak Spring Canyon Road, Wagner Ranch Road, and Wood Ranch Road. We do understand, however, that BLM is under pressure to provide access into the high country. Of the proposed roads, we feel Whittaker Ranch Road would have the least negative impact on the Canyon. Therefore, we would consider supporting BLM efforts to gain access through Whittaker Ranch Road in return for dropping access through the other three roads.

Because the "open house" format for the public meeting, February 15, does not appear to present an adequate forum for discussion of our concerns, APOA respectfully requests that the BLM respond in writing or send a representative to meet with association members.

Most residents of this end of the Canyon feel that the BLM has been a good neighbor. In the projected Pinal County plan for our area, a major consideration will be to coordinate our plan with the BLM plan for the Wilderness. We are certain that both the

Bureau and APOA wish to continue this amicable relationship.

Sincerely,

Lola T. Newton, Vice-President

Susan Luebbermann, Secretary
Aravaipa Property Owners Association

ATTACHMENT

CC: Ray Brady, BLM District Manager
DeConcini, senate
Hon. John McCain, U.S. Senate
Hon. Jim Kolbe, U.S. House of Representatives

Aravaipa Property Owners Association, Inc.
c/o Lola T. Newton
AC Star Route Box 4205
Winkelman, AZ 85292

602/357-6247

ARAVAIPA PROPERTY OWNERS ASSOCIATION - COMMENT, CONCERNS, OBJECTIONS REGARDING THE DRAFT BLM SAFFORD DISTRICT RESOURCE MANAGEMENT PLAN

APOA'S MAJOR CONCERNS ARE THE PROPOSALS IN ALTERNATIVES A, B, AND C TO OPEN CURRENTLY PRIVATE ROADS IN THE CANYON (Oak Spring Canyon Road, Whittaker Ranch Road, Wagner Ranch Road, Wood Ranch Road) FOR PUBLIC ACCESS.

Opening these roads will defeat BLM conservation objectives for Aravaipa Canyon and can seriously affect the health and lifestyle of Canyon residents.

ENVIRONMENT - (Management Concern 9) The BLM is concerned about air quality. So is the APOA.

Opening the roads will

Significantly intensify dust pollution due to increased traffic on Aravaipa Road and on the roads leading to the high country. In the past two years we have already experienced a heavy increase in traffic and dust particulates.

Increase fire danger. As more people use the roads the potential rises for careless smoking and failure to adequately extinguish cooking fires.

WATER RESOURCES - (Management Concern 8) The BLM is concerned about water quality. So is the APOA.

Opening the roads will

Increase the amount of trash and garbage that will directly and indirectly pollute creek water. Residents already "police' the areas along the road and creek, where everything from disposable diapers to old chair frames are discarded. With more people using roads to the table lands, there will also be more picnickers and more unhealthy garbage along the creek. Garbage in the back country can pollute through runoff.

CULTURAL RESOURCES - (Management Concern 5) The BLM is concerned about destruction of cultural resources. So is the APOA.

Opening the roads will

Increase the destruction and vandalism of prehistoric sites in the area as more "treasure hunters" have access. Given the terrain, it would obviously be impossible to monitor and prevent such activities.

CRIMINAL ACTIVITIES - APOA is concerned

Opening the roads

Will encourage criminal activity, particularly activity that is drug related. Drug incidents have already occurred in the Canyon, and unquestioned access to the high country can only provide an open invitation for drug dealing and other types of criminal behavior.

DAMAGE TO PRIVATE PROPERTY - APOA is concerned

Opening the roads

Will further aggravate an already existing problem of property damage, stock management, and vandalism on private land. Land owners have an ongoing problem with cut fences, gates left open, branding wood supplies burned, and damage to equipment. Open access will exacerbate current problems.

Over many years, residents have had problems with picknickers. At one time problems were so severe that Pinal County Sheriff's Department sent personnel to camp at the creek during holiday weekends.

MAINTENANCE, MONITORING, SAFETY - APOA is concerned

If the roads are opened

Who will maintain them? Currently, the ranchers who own the properties maintain the roads to manage their lands.

Does the BLM propose to improve and maintain the roads?

APOA members can see only an increase in the problems cited above if public access is facilitated through road improvement.

Who will monitor for unlawful use and activities?

Given the existing national economic situation, monitoring activities in the high country would undoubtedly be a very low funding priority. Additionally, as previously cited, nature of the terrain makes monitoring extremely difficult.

Is the BLM prepared for increased search and rescue?

As more people use the high country, potential rises that there will be accidents and individuals becoming lost. Search and Rescue is expensive and often dangerous.

OTHER CONCERNS

1. On page 23 of the RMP, item 6 states, "Obtain legal access, for public and administrative use, across private lands in 37 locations Districtwide ... and across other ... **private lands as determined in the future."**

Most property owners are willing to provide access for BLM administrative use and to a limited extent to known public; however, we object to both the currently recommended road openings and to any projected future openings in this area of Aravaipa Canyon.

S-1

2. On page 34, item 12, Brandenburg Mountain is designated VRM III, which on page 257 provides only that BLM would **"partially retain the existing character of the landscape."** Brandenburg Mountain is an important visual resource in the Canyon, as well as the habitat of big horn sheep. **APOA requests BLM to designate Brandenburg Mountain, VRM Class I.**

10

1
l/15/1990

Rex Owens
"CO-l Box 3219
Eden, AZ. 85535

Bureau Of
425 E. 4th Street
Safford, Az. 85546

Mr. Steve Knox, RMP Team Leader:

In reviewing the RMP/EIS document and draft, I would like your Alternative A (The Preferred Alternative). but with a few minor considerations. Allotment Management Plans should include input from permit holder (Rancher) to BLM on wildlife monitoring and habitat areas. We seem to have hunting seasons over lapping and extended, such as regular hunting season, Black Powder, Pistol, Bow and Arrow and etc., for different species of wildlife. ""ma" activities should somehow be restricted for periods, more so that habitat degradation or loss does not take place. The permitee and BLM should have high priority when establishing these seasons. AMP establishes objectives and priorities for management Of livestock use, but the rancher can only complain about cattle being driven away from water and grazing, gates being left open and etc., for extended hunting seasons. As I continue, note I also hunt and feel the Ariz. Fish and Game need some help. It seems that during these extended seasons the cultural resources are found to be damaged. The rancher or permitee will more the" likely help patrol the cultural resources when they are brought to his attention.

10-1

10-2

I

BLM studies along vith AMP development, monitoring water and wildlife habitat are proving to be satisfactory. The present management should be congratulated in the development of the RMP/EIS along with the interdisciplinary teams of Resorce Specialists that brought the RMP/EIS about.

I feel after reviewing the alternatives (Preferred Alternatives) as identified, that the Alternative A provides a balanced approach to multiple use and should be implemented. The Management Concern 5 - Cultural Resorces is most important and the actions to accomplish the objectives very good. I would like to see this as planned implemented.

The Safford District Resource Management Plan and Environmental Impact Statement Draft provides comprehensible information to all concerned.

Yours truly

Rex Owens

Rex Owens

11

February 15, 1990

Bureau of Land Management
Safford District Office
Safford, AZ 85546

Ref: Safford District RMP/EIS dated December 1989

Gentlemen:

While better than most BLM RMP's, this Draft EIS still falls far short of adequate protection of important natural resource values in the Safford District. Alternative B was far better than the Preferred Alternative for ACEC's but still provides less than minimal protection of District resources. Alternative B and the Preferred Alternative should also recommend Fishhook Canyons, Markham Creek, Mescal Mountains and Turtle Mountain as ACEC's. The Dos Cabezas Peak ACEC should be at least 200 acres in size.

All the ACEC's should have livestock grazing eliminated, be withdrawn from all mineral activity and prohibit OHV's except on roads. There is no way to protect special values such as flora, fauna, paleontological and archaeological; and continue to allow the above activities. For the most part, ACEC's need more rigid protection than Wilderness, especially livestock grazing.

Wild and Scenic River recommendations were pretty good in Alternative B but Wilderness recommendations were totally inadequate. All the studied WSA's have outstanding wilderness values and should have been recommended. It is Congressional responsibility to decide after you have reviewed them for their Wilderness characteristics. Day Mine, Gila Box, Turtle Mountain, Javelina Peak, Peloncillo Mountains, Bowie Mountain, Baker Canyon including additions, Apache Box and Hoverrocker all have exceptional Wilderness values.

11-1

All private land in Guadalupe Canyon should be acquired and it along with Baker Canyon and the adjacent Forest Service Bunk Robinson should be designated Wilderness and the BLM lands should be ACEC status.

Multiple use does not mandate that all public acreage must be used for all potential uses. Far too many Safford District acres are dedicated to maximizing livestock and mining uses and OHV recreation - a disproportionate amount. There is no way to avoid inadvertent damage to cultural resources, minimize soil erosion and optimize wildlife and biological diversity; and allow livestock grazing, mining and OPEN OHV use on the same lands.

11-2

The Savory (Holistic?) grazing method should not be permitted in the Safford District. This area never had the large herds that Savory is predicated on. Savory was a failure in Africa. It is just another smokescreen for additional overgrazing in the Southwest.

Although only Congress can eliminate grazing on public lands, the BLM should notify Congress in this RMP/EIS of the severe damage being done to public lands by livestock grazing and the impossibility of continuing grazing levels and meeting the resourte protection objectives.

11-3

I do applaud your plan to get 75% in good to excellent condition by a 15 year plan, I urge you to go c 95% Excellent by 2002. You will nc if you continue to allow grazing i seasonally.

The Timber Draw Retention Dam shou archaeological surveys and mitigat be much diminished if livestock gr eliminated in it's watershed.

In summary, although this Plan is I've perused, it still falls far s District's natural resource base. commodity production over resource grazing; it is heavily subsidized that we have surpluses from free a better weak Pre many ACEC's, the have minimal to no protection from That yields pseudo ACEC's. I urge in your plan.

Sincerely,

Jim Notestine

Jim Notestine

PO Box 461
Sonoita, AZ 85637

12

February 18 1990

District Biologist
BLM-Safford District
42 5 East 4th Street
Safford, A2 85546

Dear John,

Thank you for mailing me a copy of the Safford RMP for my review The document identifies four chief issues of concern on which I will comment briefly.

1 Access I should like to see access in sensitive areas limited to authorized use only to prevent further descrecation of resource values

2 ACECs and other types of special management designate all identified candidate ACECs as official ACECs to preserve important resource values The two segments of the Gii and San Francisco Rivers should as wild and I have not seen the final list of wilderness areas designated in the current BLM Wilderness Bill, but I believe that the areas adjacent to Aravaipa Canyon and Galiuro Wilderness areas were included as wilderness areas

3 vehicles - recreational use of these vehicles should be restricted in ACECs and other sensitive lands, including riparian areas

4. Riparian areas priority protection should be afforded these important areas Arizona has already suffered loss of many riparian areas and we must protect ALL remaining riparian areas for the presevation of wildlife species and for our own water sources All watersheds must be protected from overuse from recreational use, overgrazing of livestock and destruction from OHVs

I would like to comment specifically on the objectives and actions to be implemented to resolve the Wildlife Habitat Management Concern The proposed Alternative A omits highly important species under item 1 on page 30 Subitem b only identifies "Species identified for reintroduction in Fish and Wildhfe Service plans - aplomade falcon and woundin" It is crucial to future reintroduction of endangered species that this be replaced with subitem b under Alternative B on page 50 which reads "Species extirpated from the Safford District - aplomado falcon, woundfin, grizzly bear, wolf*

12-1

Colorado River squaw fish, black-tailed prairie dog and river otter " *(Italics supplied)

Future reintroduction of the endangered Mexican wolf (*canis lupus baileyi*) is the also the responsibility of the Fish and and if found to be feasible, would be administered by the Arizona Game and Fish Department Commenting specifically on the Mexican Wolf Recovery Plan of 1982, it is imperative that all candidate potential reintroduction sites be maintained with emphasis placed on preserving habitat suitable for reestablishment of the Mexican wolf. Studies by the Arizona Game and Fish Department identified 15 potential reintroduction sites, several of which fall under the administration of the District These studies were done in conjunction with the Fish and Wildlife Services request that Arizona and New Mexico come up reintroduction sites While m-depth feasibility studies of these sites have yet to be made, these habitats must be maintained to encourage large deer populations, healthy vegetative cover and supplies The AGFD is currently conducting a survey to determine how various segments of the pubhc perceive the wolf Following the completion of this tidy. it is hoped by many who believe in reestablishment of endangered species, that further be made of the potential sites by qualified biologists. It is therefore imperative that every effort be made in the Safford District RMP to make this a priority item

Thank you for your consideration of this important matter Please notify me of taken to correct this matter For your information, I enclose information a forthcoming Arizona Wolf Symposium which you may be

Sincerely,

Bobbie Holaday
Founder/Director
Preserve Arizona's Wolves

1413 East Dobbins Rd
Phoenix, Arizona 85040

copies Ken Russell, Assistant Deputy Director, USFWS
Terry Johnson, Endangered Species Coordinator, AGFD

13

Draft Safford District Resource Management Plan
Public Comment Form

Issue/Management Concern: All the issues

Comment: Access without it we can not use our BLM Lands. We urge you to Trade or Buy out right or get ingress-egress conservation easements in to our BLM Lands so we can all enjoy them. We feel that if a lessee denies the public from that land that he or she is leasing from the BLM then, that person or corporation should be terminated from leasing that BLM land in the future.

We support the ACEC and other types of special management purposed.

We support the Off-Highway Vehicles use as purposed. staging it in some areas and letting it be in others.

We support the protection of all Riparin areas as purposed.

We support the Gila Wild and Scenic River (Coolidge Dam to Winkelman) and (Gila Box). Please look into at least foot access from Hwy to Dam along river.

We appreciate the right to comment on these issues. And we appreciate the use of our BLM Land.

Name: Albert R. Wentz
Representing: Tucson Rod & Gun Club
Address: Conservation chairman
P.O. Box 12921 Tucson AZ 85732
Date: 2-21-90

14

THE SAN CARLOS APACHE TRIBE

0
SAN CARLOS, ARIZONA 85550

(602) 475-2361

Buck Kitcheyan
Tribal Chairman
Ronald Edwards
Tribal Vice Chairman

February 21, 1990

Mr. Ray A. Brady, District Manager
Bureau of Land Management
Safford District
425 E. 4th Street
Safford, AZ 85546

Dear

Apache Tribe requests that you present to Apache Tribal Council, as part of your trust responsibilities to the Tribe. a brief overview of the Safford District's draft Resource Management Plan. In this overview of the RMP, we desire that you specifically address the issues and concerns which affect the Tribe or its resources.

As I am sure that you are well aware. the reservation shares a large border with the Safford District: San Carlo* Apache Tribal Members compose a significant and unique group of public land users within your district. However, I am concerned that you do not appreciate the full dimension of the Federal/Indian trust relationship. This is a government-to-government relationship and is not the sole domain of the Bureau of Indian Affairs. More specifically. it is the Department of the Interior which is charged with the responsibility of upholding this trust, including the Bureau of Land Management where its management affects the trust obligations of the Federal government toward trust lands and resources of Native Americans.

Some of the specific areas which we desire addressed are :

14-1 1. How does the plan address the issues and concerns associated with the common boundary that we share and the management of resources common to both management

14-1 jurisdictions? (ie. watersheds, wildlife habitats, Areas of Critical Environmental Concern, wilderness areas, livestock trespass, fuelwood trespass, etc.)

14-2 2. Does the RMP create a format for resolving questions concerning the legal boundaries of the reservation (where it borders the Safford District) as established through the Executive Orders of November 9, 1871, December 14, 1872, and August 5, 1873?

14-3 3. mat common border areas, because of common resource* management concerns, does the BLM wish to develop Cooperative Management Agreements with the San Carlos Apache Tribe and are these addressed in the RMP?

14-4 4. How did the Bureau of Land Management involve the Tribe, Tribal Authorities and Tribal Members in the planning process and how does the Safford District intend to involve these groups in the continuing RMP process?

14-5 5. How are needs Of Apache Tribe and members addressed (ie. the need to gather emory oak acorns, pinyon nuts, and medical, ceremonial and religious materials)? Were attempts made to involve San Carlos Apaches in the identification and protection of important Apache historical, religious or ceremonial sites or other ethno-historical uses of the natural resources within the Safford District?

14-6 6. Were environmental education plans included within your RMP and if so were the San Carlos, Pt. Thomas, and Globe School Districts included within these plans?

14-7 7. Was an attempt made to determine if the San Carlos Apache Tribe has or is developing a resource management plan which would affect the resources management on the Safford District?

Tribal Council meetings are held the first Tuesday of every month: there are two council meetings scheduled before the end of your comment period. Please arrange a briefing for one of these meetings by contacting myself or my secretary, Mrs Barbara Manulito, at 475-2361 and requesting to be placed on the Agenda.

The San Carlos Apache Tribe wishes to foster a spirit of cooperation in which the resource management goals of both parties can be achieved and one in which the trust obligations of the Federal government CM be met. In light of these requirements, the San Carlos Apache Tribe has recently begun a similar resource planning project which we refer to as the Integrated Resource Management Plan (IRMP). Many similar issues and concerns will be addressed in our planning process. We welcome your agencies full participation in the development of this management framework.

Sincerely,

TRIBAL CHAIRMAN
SAN CARLOS APACHE TRIBE

xc: Mr. Wilson Barber, Phoenix Area Director, BIA
Mr. Allen Anspach, Superintendent, San Carlos Agency, BIA
Mr. Lynn Engdahl, Acting Arizona State Director, BLM

15

Draft Safford District Resource Management Plan
Public Comment Form

Issue/Management Concern: Reparian areas and marginal habitate areas.

Comment: I want to thank you for your presetation of the work BLM has done and inviting the public to make comment. I also wish to thank you for th. moratoriam on cattle grazing in the San Pedro Reoparian Area. The River has blossumed In those particula- areas.

I am aware that you can repair all reparian areas because that is your job. I would love to se. you manage all the reparian areas as you have do". with the San Pedro for the purpose these precious spots of nature back to its prestine state. The reparians areas can not be preserved without keeping cattle off of them. For they graze the native plants into extinction and destory the wildlife habitate just by being there doing what cows do.

15-1 I'm asking you to put along term moratorium of livestock grazing on all reparians areas that BLM I cannot stress this enough. Do it before we completely loose all of those precious areas. I understand there is only of the total south vest which still has "Prestine" conditions. Thats not much. In addition no livestock grazing on marginal habitat. areas.

I also strongly oppose all A.D.C. "predator" killing o" BLM land. Altho Rabies Control is necessary if the animal is acting like it has rabies.

I am part of the "public" and we have a decision on ho.' the will be used because it is public land. I speak strongly againly killing of "predators on BLM land.

Again, I appreciate your good management land use. I do have a concern about the us. and Pesticides. The scientist try and tell us that the poisons break down quickly. This is not true. They don't break dawn that quick and as they do some breaking dawn they leave toxic residue. If you want to rid certain plants on your land, let me knw, I co" get a volunteer group to purl the noxious plants much easier and quick than you could spraying.

Name: ~~Representative~~ name, C. nl Escott
Address: P. O. Box 1560
Bisbee, Ariz. 85603
Date: March 3rd. 1990
432-4292

16

District Manager
Bureau of Land Management
425 E. 4th Street
afford, AZ 85546

Feb 28,1990

I have read your RMP with interest. Being a member of the Tucson Rough Riders my concerns are with the effects of the plan on roads and trails. I can see alot of hard work went into preparing this plan. It provides protection for environmental areas and allows vehicle access at the same time. Of the four plans I find plan C to be most suitable. Plan B is totally unacceptable due to the restrictive nature of the plan. I applaud your plan to obtain legal access across private lands.

Sincerely

Rheal Tetreault

Rheal Tetreault
1960 W. Brittain Dr.
Tucson, AZ 85705

17

L. B. Curry
1040 Pueblo Place
Lake Havasu City AZ
86403

March 3, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E 4th St. Safford AZ 85546

Regarding the Safford District Resource Management Plan and Environmental Impact Statement draft of January 1990. Even "Alternative D" (No Action) is far too much action. Please leave everything just as it is — close no roads — withdraw no mining areas - no artificial game cover - no wildlife studies - no more erosion control structures etc. Please re-read the "BLM Mission" printed inside the front cover - particularly the last sentence bearing in mind that yield means income not outgo! In these austere times we cannot afford your grandiose restoration. Wildlife is being adequately managed and provided for by the State of Arizona. Many of your erosion control structures have failed and at most inopertune times, causing greater havoc than if they had never been built. Your archeological examination of sites with a backhoe have utterly destroyed the site for archeological study.

Copies of this letter are being sent to Arizona's Congressional delegation and in accompining letters I am volunteering to guide them or their delegates to numerous failed erosion control structures, destroyed archeological sites, numerous failed transplantations etc.

L. B. Curry

In other words its time to get the BLM back down to earth! Your mission is not to restore the desert to what it may have been before the white man came. Its time to get your budget into the world of reality and live within your means. No expenditures above or beyond the income from the land.

Taxpayers have had enough of your "Empire Building" — cut your budget - cut your staff. BLM employees contribute nothing to the GNP but do make a substantial contribution to the Trade imbalance.

I know that asking the BLM to be profit making is too much to hope for, but bear in mind we cant afford the way you are operating now.

cc
Senator Dennis D. Concini
Senator John McCain
Rep. John J. Rhodes II
Rep Morris K Udall
Rep. Bob Stump
Rep John Kyl
Rep Jim Kolbe

Sincerely

L. B. Curry

18

Dear Mr. Knox, 3-5-90

I write in support of limitation of ORV access to BLM land. ORV use is nearly synonymous with desert destruction. Give ORV users non-critical areas to use, observe the results, and rest assured that limitation is the best policy.

I also support your plan to establish Areas of Critical Environmental Concern. Arizona has lost so much habitat already that BLM needs to expand its recent efforts at protection. Preservation benefits everyone. Your efforts are appreciated. Sincerely,

Mark Stevenson
4320 E. Monte Vista #J207
Tucson, AZ 85712

19

March 6, 1990

Mr. Steve Knox
BLM
Safford District
425 E.
Safford, AZ 85546

Dear Mr. Knox:

Many of the areas that you manage are quite sensitive to human use and abuse, in particular from off-road vehicle use. I urge you to establish the necessary Areas of Critical Environmental Concern to protect in eastern Pima County from further abuse by off-road vehicles.

Sincerely,

Sue

Sue Wallace Cabin
8780 E. Placita Bolivar
Tucson, AZ 85715

20

These are my comments for the record regarding your pending RMP. Here's hoping you moderate your anti-mountain bicycle views. -r.p.

Dear Sirs:

I've had a chance to look over your current Draft Resource Management Plan, and I must say that I'm very unhappy with your attempts to deny reasonable access to mountain bike riders.

20-1 First, I object strongly to your lumping mountain bicycles in with "ORV'S" like jeeps, trucks and motorcycles in a transparent attempt to curtail our trail access. Mountain bikes, unlike "ORV'S", have only a minimal environmental

impact -- certainly horse, and virtua typical hiker -- an bicycles don't dis from using most lands horses and

Further, I obj apparently held by them that mountai incompatible with ot. Nothing could be f Successful mutual mountain bikers and trail users has been

3

western U.S., and there is no valid reason why mountain bikers should not be able to share the trails with other users in the Safford District. This view is not popular with some environmental and equestrian groups, but they need to be exposed for the selfish elitists that they are.

In short, mountain bikers want to be treated fairly -- not only because our tax monies support your activities as much as any other groups, but primarily because allowing mountain bikers fair access to public lands is simply the right thing to do.

Sincerely, Vernon W. Patrick

21

3/6/90

District Manager

Dear Sir:

21-1 I

As an avid mountain bike enthusiast, I was very disappointed by reading your current draft Resource Management Plan for the Safford District. I believe that it is very unfair to group mountain bikes in with off-road vehicles such as 4-wheel drives As far a comparative damage is concerned. it is apparent by looking at various trails that mountain bikes cause far less degradation than a shod horse, and only slightly more than a person hiking in heavy hiking boots. By classing mountain bikes with motorized vehicles, the BLM is denying us access to important areas of southern Arizona's back country. We *believe* that we have just as much right to enjoy these tax-supported areas as others groups who, it should be noted, have their own narrow interests served by keeping us out. Mountain bikes are a fun and low impact way to enjoy the outdoors which the BLM is protecting and managing for all of us--not just the select and influential few. With the ever increasing interest and support of mountain bikes, as indicated by the now 5 million being sold every year, more and more people are choosing off-road bicycling as their primary means of recreation. and will soon be a force that must be dealt with equitably. Conflicts between interest groups can best be dealt with through increased education, not by blatantly discriminating against one group or another. I would be pleased if my concerns as well as those of other biking enthusiasts were given more attention in any revisions of the Safford District RMP.

Sincerely,

Ronald P. Martin

Ronald P. Martin
9210 E. Calle Kuehn
Tucson, AZ 85715

22

Draft Safford District Resource Management Plan

Public Comment Form

Issue/Management Concern: ACEC - Access

Comment: If any access is to be considered at all it must be allowed only to hikers or horse back riders. Off-road vehicles would be fatal to the Aravaipa ecology.

Name: JERRY ISER

Representing: ~~AROA INC.~~

11000 Aravaipa Canyon Rd

WINKELMAN AZ 85292

Date: 3-1-90

23

LOLA T. NEWTON
AC STAR ROUTE BOX 4205 WINKELMAN, AZ 85292

COMMENT: DRAFT SAFFORD DISTRICT RESOURCES MANAGEMENT PLAN

Issue: Public access to roads in western Aravaipa Canyon

Comment: The BLM proposal to open roads to public access in this area can have only negative impact on a sensitive environmental area and current residents. Over the past three years, there has already been a steady increase in; traffic, dust pollution, and vandalism -- including damage to a windmill, corrals, and fences.

Further, until the sheriff's office sent personnel to patrol on several holiday weekends, we had incidents of blatant trespassing, threats, and every type of human garbage tossed on the stream banks, into the water, and along the road. We have an onging problem with trash and garbage as it is.

Opening the roads to the public will not only increase the number of people and vehicles coming to the area, but will also exacerbate all the problems. Individuals who have so little regard for the environment are not going to behave any better when they have open access to the high country. Moreover, open access will be an invitation to use the more remote areas for all types of illegal activities, especially drug related.

The BLM is certainly not going to monitor problems along Aravaipa Road; and, obviously, the Agency could never have enough staff to enforce regulations for use of access roads or land in the high country. Currently, property owners do, at least, provide some control of persons using their private roads for access.

We recognize that federally owned lands belong to the public and that the public should have reasonable access. Nonetheless, we feel that the BLM should be looking at other routes of access, even if it entails future road building to the north of Aravaipa Canyon and in from the San Pedro River valley.

We respectfully request that proposals to purchase or acquire right-of-way over private roads in western Aravaipa be deleted from the Resource Management Plan.

Finally, we appreciate that the BLM has been a good neighbor in the Canyon.

March 10, 1990

24

8425 Avenue
Glendale, Arizona 85302
(602) 937-6536

March , 1990

Knox
RMP Team Leader
BLM
425 E. 4th street
Safford, Az. 85546

Dear

I am in receipt of the Safford District RMP/EIS. I congratulate you and your co-workers on this good piece of work.

I have a couple of comments regarding your preferred alternative.

Alternative B should be the preferred alternative because it:
- has higher number of ACEC acres
- greater number of acres closed to OH"
- recommends the San Francisco river as suitable for inclusion in the Wild & Scenic River System
- this alternative stresses conservation more than A or C

I like the definition of limited OHV use, whereas these vehicles will be confined to existing roads and jeep trails as identified in your review process. Option C is unacceptable as far as OHV use is concerned.

I like your management of the San Pedro RNCA and the building Timber Draw Dam on the San Simon. I approve your filing for as many in-stream water flows as possible.

Please continue to emphasize recreation and wildlife protection and reduce grazing and mining activities. You are the stewards of the nicest BLM lands Thank you.

Sincerely yours,

Gabriel Zinsli

25

3/12/90

Steve Knox RMP Team Leader
Bureau of Land Management
425 E. 4th St
Safford, Az 85546

I obtained and have studied the RMP.
Of the four alternatives outlined in detail I support alternative B

I support alternative B because:

1. It benefits 4000 acres of riparian vegetation.
2. It restricts OHV use, closing 1,400,000 acres
3. Improves wildlife habitat in 151,739 acres
4. Closes Bighorn Sheep lambing areas
5. Protects archeological & paleontological sites
6. Restricts cattle grazing in critical areas.

I support alternative B because it best protects the aravaipa and Malpais areas. Our grandchildren and their children will be able to hike and camp there as we have.

I strongly urge the BLM to work closely with the Nature Conservancy and accept their help and advice.

Sincerely
Harry Frye

FRYE
130 EL MEMBRILLO
GREEN VALLEY, AZ 85614

26

3-10-90

DEAR R.M.P. TEAM LEADER

I WOULD LIKE YOU TO KNOW THAT I SUPPORT ALTERNATIVE B OF THE CURRENT RESOURCE MANAGEMENT PLAN.

THE WILD AREAS AND THE WILDERNESS NEED ALL THE PROTECTION THAT WE CAN GIVE. THERE ARE PLENTY OF JOBS AND PLACES TO LIVE. WE DON'T NEED ANY MORE DEVELOPEMENT OF ANY KIND.

I WOULD ALSO LIKE TO GET RID OF THE COWS.

YOURS FOR A FUTURE
Jack V. Huston

JACK V. HUSTON
RT #1 BOX 694
MIAMI ARIZONA
85539

27

Mr Knox: 3-12-90

In regards to the Safford Dist Resource Mgt Plan, I have 2 comments:

1) Do not open up & improve roads in the Muleshoe & Aravaipa areas. These are critical habitat areas & shouldn't be accessible to off-road vehicles.

2) Do establish "Areas of Critical Environmt'l Concern" to protect important cultural & environmt'l sites.

Jule Brown

28

March 16, 1990

Dear Mr. Knox,

Please support Alternative B in your RMP. It provides the best protection for the Aravaipa & Muleshoe - as well as other areas.

Arizona is rapidly becoming over-populated & now is the time to preserve important environmental areas - & protect dwindling wildlife.

Altho I drive a Bronco, I feel it is important to restrict OHV use.

I hope the BLM will work with the Nature Conservancy & act wisely.

Sincerely yours,

29

March 16, 1990

U.S. Department of the Interior
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Gentlemen:

I am writing to you regarding the high country south of Aravaipa Creek; specifically the old Woods Ranch Allotment at the West End.

As a horse owner. I feel that this area has great potential for trail riding. It is within a reasonable distance from Tucson and many riders would welcome the use of trails in this area.

We hope that it will not be opened to ORV use. There ate roads that occasional 4-wheel-drivers can use. There are roads that could stand some ORV use, but any unlimited opening could prove to be extremely detrimental to the land. These watersheds above the Creek are important to this riparian area. if erosion is caused by off-road driving the area could be ruined.

We hope you will think favorably about horseback and hiking use.

Sincerely,

Kristin Coleman

Kristin Coleman
Member, Pima Trails Association

30

Mr Wm C Hacker
[illegible]
Green Vly AZ 85614

March 17, 1990

Mr Steve Knox
R.M.P. Team Leader
B.L.M
425 E Fourth St.
Safford AZ 85546.

Dear Sir,

I have been able to examine your proposed Resource Management Plan both from a copy obtained from the AZ Nature Conservancy and the Summary published in Desert Sky - Spring 1989 (Summit Hut, Tucson AZ). I do not think your Alternative "A" gives adequate protection to Aravaipa Canyon and Creek. After all Aravaipa Canyon is the most beautiful canyon in the USA after the Grand Canyon. It should be preserved as much as possible as is for your and my children, grandchildren etc.

My opinion is that Alternative "B"

Page 2

will provide much better management & protection of both natural and cultural resources while allowing for use and development.

I feel that BLM along with National Forests, and National Parks should be very concerned with preservation of our resources as well as developing practical uses.

Thank you for giving me this opportunity to inform you of my feelings.

Yours Truly

Hilla Hacker

31

1745 W. La Calandria
Green Valley, AZ 85614
March 15, 1990

Dear Mr. Knox,

As a member of the Nature Conservancy and an active hiker and nature photographer, I am writing to urge you to adopt Alternative B of the Resource Management Plan. I hope you will work closely with the Nature Conservancy and listen to their reasons why this is the best plan for protecting our precious wilderness habitat, wildlife and vegetation from thoughtless or selfish abuse and exploitation. The Aravaipa and Muleshoe areas are very special! It is so important to protect them — not only for the wildlife who are dependent on that area and for the human beings who enjoy seeing nature unspoiled, but also for our children and grandchildren! We must learn to care for all the creatures of God's creation and live in harmony with them, for their sake and also for our own in the long term. Too long we have thought only of our own financial gain or selfish use. We must become responsible stewards — care-takers — of the earth and all kinds of life.

Support Alternative B!

Sincerely yours,
Dorothy Atkinson
(Mrs Arthur Atkinson)

32

1507 Placita Travis
Green Valley. AZ 86514

March 17, 1990

Steven Knox, RMP Team Leader
Bureau 01 Land Management
425 E. 4th Street
Safford, A2 85546

Dear Mr Knox,

I am writing to support Altemative B for the Resource Management Plan I think It will be the best alternative to protect the Aravaipa areas because It restricts cattle grazing and off use.

I am a hiker and a birdwatcher and I value any action to preserve the natural beauty of the Arizona wildlife and plants

Sincerely.

Sharon Creeden
Sharon Creeden

33

126 La Soledad
Green Valley, AZ 85614
March 16, 1990

MI. Steve Knox
RMP Team Leader
Bureau Of Land Management
425 E. 47th Street
Safford, AZ 85546

Dear Mr. Knox:

It has come to my attention that the BLM is considering several plans in regard to management of the wilderness areas of Aravaipa and Muleshoe.

My husband and I are avid hikers and have hiked in the Aravaipa Creek area both last year and this year. It is a beautiful wilderness area and we would be sorry of any plan that would change its present use.

I realize that you are always under pressure from special interest groups to change the use of the land to benefit them specifically. However, ii is important, too, to consider what is best for the land in the long term and what is best for the future generations of Americans who love the land for its sheer beauty.

Of the four alternative plans that have been proposed, I feel that Plan B would best protect the wilderness habitat, wildlife & flora. I would urge you to implement Plan B and to work closely with the Nature Conservancy and accept their help and advice.

Sincerely,

Helen Zaukas

Helen Zaukas

34

Steve Knox, RMP Team
Bureau of Land Manage
425 E 4th St
Safford, AZ 85546

Dear Sir:

I have reviewed
for resource manage
district & strongly a
I have hiked & en
in both the area
areas. Plan B is
in my opinion.

The Nature Conser
job helping to manag
areas. I hope the
with them & accep

35

221 W. La Canoa
Green Valley, Az. 85614
March 19, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, Az. 85546

Dear Steve Knox:

I strongly support Alternative B for the Aravaipa and Muleshoe Areas where it is most important that Off Highway Vehicles, as well as Cattle Grazing, be restricted.

Along with nine other people, I hiked Aravaipa Canyon in October after waiting a year to receive the permit. It was a rare and breathtaking experience. Aravaipa Canyon is a National Treasure that should be carefully protected from overuse and abuse because of Its riparian vegetation, archaeological sites and wildlife habitat so that future generations may enjoy them as we are now doing. I urge you to work closely with the Nature Conservancy---Accept their Advice and Help---Everyone will benefit.

Sincerely,
Marian Schuman
602-625-6644

36

MEMORANDUM from the desk of

JOHN W. TILSCH

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E 4th Street
Safford, Ariz. 85546

Dear Mr. Knox

As information, I am a member of the Green Valley Hiking Club and an active working member of Friends of Madera Canyon.

I am very interested in protecting and preserving the wilderness area of our beautiful State and strongly urge you to support alternative B.

The increasing use of off highway vehicles is particularly damaging to both wildlife and plant life.

Thank you
John Tilsch
2851 S. Camino Gabay
Green Valley Ariz
85614

37

17 MARCH 1990

MR. STEVE KNOX
RMP TEAM LEADER
BUREAU OF LAND MANAGEMENT
425 E. 4TH STREET
SAFFORD AZ 85546

DEAR MR. STEVE KNOX

REQUEST YOU SUPPORT ALTERNATIVE B SINCE IT BEST PRESERVES THE ARAVAIPA AND MULESHOE AREAS.

PROBABLY THE ~~MOST~~ MOST IMPORTANT FEATURES OF ALTERNAIVE B:

RESTRICTS OFF HIGHWAY VEHICLE USE - CLOSING 1,400,000 ACRES TO OHV USE.

IMPROVES WILDLIFE HABITAT BY MANAGEMEN OF 101,700 ACRES.

CLOSES BIG HORN SHEEP LAMBING AREAS DURING CRITICAL PERIODS

PROTECTS ARCHAEOLOGICAL AND PALENTOLOGICAL SITES.

THANK YOU

ANDREW A. TUHASZ

38

March 18, 1990

Steve Knox, RMP Team Leader

Bureau of Land Management
425 E. 4th St.
Safford. Az. 85546

Dear Sir,

I hare been privilaged with an opportunity to read the Safford District R.M.P. and E.I.S. It certainly appears to be a thorough study for your area of concern. As a frequent visitor to many of the areas covered by the study my analysis of the report leads me to urge you to reconsider the choice of Alternative A as the "preferred alternative': Other approaches are available which can be much more restrictive on some issues and still preserve the multiple use concept. Alternative B would be a great step forward in protecting archeological and paleontological sites, over-grazing in critical areas. Big Horn Sheep lambing areas and delicate riparian vegetation. It would also close additional sensitive areas to off highway vehicle use.

We must all act wisely and decisively now to protect our vanishing wild areas. This can be done without ignoring the rights of hunters, fishermen or OHV users. Alternative B will accomplish all these things much more effectively than the "preferred" alternative as designated in the RMP and EIS.

Sincerely,

William D. Fritz

William D. Fritz

909 Quail Dr.
Green Valley, Az. 85614

39

1322 Condesa Primera
TUCSON, ARIZONA 85718
17 March 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Knox:

I would like to make comment on the draft RMP/EIS for the Safford District. Through the 1980s, our nation went through an attempt to go back to the 1950s. It did not work. The world, the nation, and our state are not like they were four decades ago, and we cannot go back. The impossibility of the "good old days" is the compound product of population growth (from 151 to 251 million) and technological impacts. Those impacts do not stop at the state line, but are connected to global climate, demand for our products, and natural cycles of water, carbon, etc. The latest news of computer modelling of global climate envisions increasing heat and drought, the kind that grew little grass In the past summer, making intensive grazing eve" more impossible than it

Hence planning for use of a national resource in the form of public lands in southeastern Arizona cannot be limited to the viewpoint of traditional livestock grazing and hunting. Just as there is a BLM, the images of cowpokes in the saddle and gun racks in the pickup is fading to a last refuge in the movies. There is more demand for the service functions of natural lands than for the beef, more need for protection of natural systems than provision for vehicular access. There is also more need for information than what is currently available in the DEIS and the assumptions underlying the alternatives. The only alternative that approaches a" ecosystem view, alternative B, has in common with A and C the rebuilding of roads that caused previous erosion (e.g. Virgus Canyon Road,, erosion that is incompatible with "Management Concern 7- Vegetation", p. 40.

The Galiuro Mountain system has been the scene of not mere predator control, but if news accounts have been accurate, of prolonged agonizing deaths for black bear. body mutilations of killed cougar. The-causal-nature of the predator problem has not been addressed, so we have nothing to refute the grapevine notion that over-harvesting of native ungulates has left the predators without sufficient natural prey. hence a" aggrevated demand for domestic stcok as the food source. Open up more roads, increase deer harvest, and what will that do for predator and rancher?

Vehicular access to natural lands Is rendered obsolete by wider concerns of energy conservation, biological diversity, carbon dioxide Imbalance from excessive burning of fossil fuels and devegetation such as results from vehicular abuse and overgrazing by domestic stock.

To run bulldozers back into the south rim uplands above Arivaipa, which are already showing poor ability to heal from past insults, is to ignore the writing on the wall: brute force is no longer the solution to our needs. The hunting and grazing pressures cannot be sustained. There are simply too many of us to hunt, and any short-term alleviations will be seen in the longer run to have bee" unsustainable land degredation.

Similarly. the Arizona economy is no longer dependent on beef production, but on urban-based technologies. Quality of life will become increasingly a matter of natural contrasts and escapes, careful watershed management. protection of biotic diversity and natural heritage. This has, in part, been the thrust of recent Arizona wilderness legislation, which has provided another contrast to this RMP/DEIS which seems a nostalgic Safford of the 50s view: put cows on the limited grass and jeeps of hunters on the uplands.

Considering what we taxpayers must pay for, ultimately, in downstream flood control, recovery plans for T & E species, range-management subsidies to cover what grazing fees do not meet, and the host of social costs of land abuse, the time for the Bureau to leave the 50s is now. You have a very Important role in the national ecology, but not that envisioned in past land use patterns.

Hence I urge a modification of Alternative B to include the "no action" alternative as regards re-opening of rutted roads into the hills. Thank you.

Sincerely yours,

Dr. William A. Calder

40

5122 East Citrus Street
Tucson, Arizona 85712
March 19, 1990

Steve Knox
B.L.M. Safford District
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Knox:

We would like to comment on the Safford District Resource Management Plan.

No more roads should be opened to off-road vehicle use - there are enough of them already. Especially - no more roads in the Aravaipa Canyon and Muleshoe Ranch areas!

All important natural and cultural resources should be protected as Areas of Critical Environmental Concern.

Sincerely,
Walter + Dorothy Pelech

41

1742 N. Louis Lane
Tucson, Az. 85712
March 18, 1990

Mr. Steve Knox,
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, Az. 85546

Dear Mr. Knox:

It is my understanding that your office is soliciting public input regarding increased protection for the Eagle Creek area with its cave which serves as a maternity colony for Tadarida brasiliensis.

The Mexican free-tailed bat and the Eagle Creek Cave have special significance for me since I spent my early childhood in Morenci where my father was a mining engineer and the bulk of my professional life as a professor at the University of Arizona. There I was involved, with some of my graduate students, in research on bat physiology. In connection with that we joined Dr. Cockrum's students annually in a study trip to Eagle Cave for the purpose of banding bats. Thus, I have known of the cave and have been interested in the bats for most of my life.

I am now retired and have not been to the cave for quite a few years. It is my understanding, however, that the population is greatly reduced partly due to the excessive use of pesticides in the Yaqui and Mayo Valleys of Mexico and partly due to local factors in Arizona. I have seen the results of pesticides (presumably) in Mexico where the grounds in front of caves used for stop-overs during the Tadarida migration were virtually paved with bat bones and the populations of living bats within dropped alarmingly. If it were not for the fact that Tadarida is amazingly resistant to such poisons, the species would have been extinct long ago. Certainly it needs all the help we can give it now. The value in terms of insect control in the Safford Valley alone is enough reason aside from the many other considerations.

As a child I recall that the population of bats at Eagle Cave was very large though I had no way then of knowing how large. When I was last there we estimated it at somewhere between 20 and 30 million. This was based on the fact that they occupied all of the space down to our waist level. The number caught in a butterfly-net and estimates of the total area of occupation led to these figures -- and we didn't even count the area within the large crack in the roof of the cave because we had no way of measuring it even roughly !

The area has historic value that is also worth protection in my opinion. The fruit trees growing near the cave (I assume some still survive) belonged to a man by the name of Miguel Soto. I remember visiting him and staying several days in his open shack when I was about 9 years old. We walked down to the junction with the Gila River where he caught a mud turtle. The turtle was added to the pot of beans when we returned and proved to be pretty good eating ! I also recall camping with my parents in the grotto upstream from the pump station on Eagle Creek.

The canyon has unique beauty with its high conglomerate walls and riparian bottom. Not many years ago we saw signs of beaver cuttings on the edges of the stream and an impressive list of other wildlife regularly seen in the canyon could easily be compiled. I'm sure you are as aware of that situation as anyone.

If there is anything that I can do to help insure adequate protection for the Eagle Creek area and especially for the cave, I hope you will contact me. My telephone number in Tucson is (602) 326-5079

Very sincerely,

Wm. J. McCauley

Wm. J. McCauley
Professor emeritus
Biological Sciences

42

Form 1600–16
(April 1984)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RECORD OF PUBLIC PARTICIPATION IN THE PLANNING PROCESS

Plan Name: Safford District Draft RMP

Date of Contract: 3/21/90

Name(s) of Individual(s) or Group(s): Robert G. Schwab, UC-Davis, professor of wildlife

Location of Contract: telephone (916-752-3209) or (1245)

Bureau Interviewer(s) or Moderator(s): Diane Drobka

INTERVAL OF PUBLIC INVOLVEMENT

- [ ] Phase I – Review of Annual Schedule and Projected New Starts
- [ ] Phase II – Scoping to Guide Planning (Issue Identification, Planning Criteria, and Planning Information)
- [x] Phase III – Review of Draft Plan and Draft Environmental Impact Statement
- [ ] Phase IV – Review of Management Decisions including Changes from Protests and Governor Review
- [ ] Phase V – Review of Plan Use and Implementation

TYPE OF PUBLIC PARTICIPATION (CHECK AS MANY AS APPLICABLE)

- [x] Individual Contact
- [ ] Small Group Discussion
- [ ] Public Meeting
- [ ] Written Statements
- [ ] Questionnaires or Surveys
- [ ] Other (specify)

Summarize briefly public input. *(Use additional sheets if necessary. Attach worksheets, rosters, press releases, etc. as appropriate.)*

Mr. Schwab called to tell us he supports increased protection for Eagle Creek Bat Cave.

Prepared by: Diane Drobka

Date: 3/21/90

43

W. TODD FURNISS 3/20/90

3361 S PLACITA MESCOLICES GREEN VALLEY, AZ 85614

Dear Mr. Knox:

I'd like to go on record as supporting alternative B of the Safford District Management Plan because of its superior provisions for protecting the area for present and future non-destructive use. I encourage you to work with the Nature Conservancy in this, taking advantage of their help and research results.

Sincerely, W. Todd Furniss

44

FRIDAY
MARCH 16

Dear Sir;

I understand you are looking at different plans for managing the Safford District. It appears to me that the alternative B plan would best protect the Aravaipa and Muleshoe Areas not only for the present but for many years in the future.

Also the views of the nature [redacted] seem to always favor the best interests of our wildlife and land, so I think it is well worthwhile to include those people in your planning.

Thank You
Kenneth Pfaff
[redacted]
[redacted] VALLEY AZ.
85614

I realize cattle played a big part in building this country but times have changed and all cattle grazing should be removed from public land. It is a [redacted]

(over)

as the cattle dei
vegetation in Arizona.
a lot of money on
lakes and get thing
[redacted]
time for them to

45

3488 S. Via del Papagayo
Green Valley, Arizona 85614

March 21, 1990

Knox, RMP Team Leader
Bureau Of
425 East 4th street
Safford, Arizona 85546

Dear

Because I am deeply concerned about the condition of the Aravaipa and Muleshoe areas, I strongly urge you to adopt Alternative B for protecting these areas.

Alternative B will restrict the use of off-highway vehicles, improve wildlife habitats, protect the big horn sheep, and in many other ways preserve the beauty of this exceptional natural area. If the BLM will work with the Nature Conversancy and accept their help and advice and adopt Alternative B, these worthy goals can be achieved.

Your help will be greatly appreciated by this concerned citizen.

Sincerely yours,

Milton P. Foster

Milton P. Foster

46

3/21/90

Mr. Steve Knox
B.L.M.
425 E 4th st. Safford, AZ

Dear Mr. Knox:

Of the various BLM plans for future land usage I would like to urge the implementation of alternative B.

This plan appears to provide the greatest long term advantage to the largest number of people through protection of the area concerned.

There doesn't seem to be any urgent need in our state to further expand environmentally destructive practices.

I would hope the BLM would also work cooperatively with the Nature Conservancy on these proposals.

Thank you
T.R. Ackerman

Mr. Tracy R. Ackerman
1280 West Placita Quieta
Green Valley, AZ 85614

47

THE SAN CARLOS APACHE TRIBE
RECREATION & WILDLIFE DEPARTMENT
P.O. Box 97
San Carlos, Arizona 85550
(602) 475-2653

KITCHEYAN

RONALD EDWARDS
Vice Chairman

22 March 1990

Steve Knox. RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, AZ 85546

Dear Steve,

o f our discussion of 21 March 1990, here are the comments of the San Carlos Apache Tribe, Recreation & Wildlife Department, regarding the Safford District RMP:

47-1 1) The map that is included in the draft RMP should not be published in h e final report, unless it is modified to correct the southern boundary of the San Carlos Apache Reservation, specifically that portion bordering the Coronado National Forest.

47-2 2) The Ranch Creek road. or the road going south from Cutter to the reservation boundary. should not be open to the general public. It should remain under its present status, i.e., whereby any non-tribal member on it is required to have in possession a San Carlos recreation, hunting, or fishing permit. In addition, the road should be gated and locked (by either the BLM or the tribe) at the reservation boundary. to alleviate some of the surveillance/enforcement expense to the San Carlos same ranger program. Eliminating access at this point would also provide some insurance to the San Carlos wildlife management program that no poaching activities in the Mescals and Hayes Mountains would be aided by vehicular access from the south. The map, of course, should illustrate closures.

This recommendation should cause no hardship to anyone. as the area south of the reservation boundary is already accessible from highway 77 in the Dripping Springs area. Also, if the BLM permittee would benefit by frequent access from the north. the tribe could Provide that person with a key to the gate.

THE SAN CARLOS APACHE TRIBE
RECREATION & WILDLIFE DEPARTMENT
97
San Carlos, Arizona 85550
(602) 475-2653

BUCK KITCHEYAN
Chairman

RONALD EDWARDS
Vice Chairman

47-3 3) Cattle allotments should not be provided in Ranges 17-18E, Townships 5 and 6S, west of the confluence of Deer Creek and Aravaipa Creek. One of the most important herds (economically and aesthetically) of desert bighorns in the world frequents this area, both north and south of the reservation boundary.

Bighorns have been historically prone to decimation caused by cattle-spread diseases. The Aravaipa-San Carlos population suffered some type of (as yet unknown) disturbance in 1989-1990, possibly disease related. The San Carlos Apache Tribe invested approximately $50,000 in the well-being of this herd in 1989 alone. Willingness-to-pay for the privelege of hunting sheep of this population has been upwards of $70,000. The low-profit industry of cattle ranching should not be allowed to jeapordize this gemstone of wildlife ecology.

Sincerely,

Brian Czech

Brian Czech, wildlife biologist

cc: San Carlos Game & Fish Commissioners, San Carlos Recreation & Wildlife Department director Jim Higgs

48

3-20-90

Mr. Steve Knox
RMP Team Leader
BLM
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Knox

I have reviewed the Safford District RMP/EIS Draft and have the following comments:

- I support Alternative B instead of Alternative A as it would maximize benefits for wildlife habitat, riparian vegetation, and paleontological resources;
- Ref. ISSUE 2, Alt. A, I would like as much of the Gila River designated as Wild and Scenic as possible;
- Ref. ISSUE 4, Alt. A, I would like the BLM to try for 100% riparian areas to be in good or excellent condition and not settle for 75%;
- On ACEC's, I support the Nature Conservancy's nominations and encourage the BLM to work closely with this group.

Thank you for your consideration and keep up the good work

David D. Aryan, P.E.

49

Margery and Marvin **Partin**

3/22/99

Steve Knox, RMP Team Leader
Re: Comments on Safford District
Resource Mgmnt Plan

Concerning the above project my wife and I support alternative "B". We feel "B" benefits 4000 acres of Riparian Vegetation and restricts off Hiway vehicle use closing approx 1½ million acres to OHV use. #3 improves wildlife habitat by mgmnt of 101,739 acres. #4 closes Bighorn sheep lambing areas which is a plus. #5 protects archaeological & paleontological sites. #6 restricts cattle grazing in critical areas.

(over)

We strongly urge the BLM to work closely with the Nature Conservancy in this project.

We hikers (I'm a leader in the Green Valley Hiking Club) really hope alternative "B" is followed.

Sincerely

Marvin L Partin
3391 Placita Encinas
Green Valley, Az
85614

50

Box 316
Bowie Az 85605
3/20/90

Steve Knox
RMP Team Leader
Bureau of Land Management
Safford Ariz. 85546

Dear Mr Knox,

Enclosed are recorded copies of protest and claims. They are recorded in Cochise and Graham Counties.

Please include these in your Final RMP/EIS.

Sincerely,

Wayne Klump
Wayne Klump

Enc.
1 Protest
2 Claims

Certified Mail # P 121 301 026
Return Receipt Requested

PROTEST

We protest the Safford District Resource Management Plan and Environmental Impact Statement, in its entirety and intent.

The intent of the Government and Bureau of Land Management is to manage, control, steal, acquire, and take our Private Property.

We Protest the Governments power and so called legal avenues to propagandize, brainwash, manipulate, control, manage, steal, take away, and acquire our Property and Rights.

We protest the creation of Javelina Peak, Peloncillo Mtns., and Dos Cabezas Mtns., Wilderness Areas, as all three are within our ranch and would cause an undue hardship on us, and adversely effect our lives and livelihood.

This is to serve notice on the Government or anyone that might turn loose or plant any Animal or Preditor within a 500 mile radius of Bowie, Arizona, That they are responsible and liable for any and all damages that said Animal or Preditor might do.

All thru the RMP/EIS, the B. L. M. plans to acquire or steal Private Property and access across Private Property in Cochise and Graham County.

This is to serve notice on the Government and B. L. M. that we own a big portion of this area, and have Grandfathered Rights since 1880.

We OBJECT vehemently to the Government taking away our property and Rights.

Wayne D Klump 2/8/90
Klump Bros. by Wayne D. Klump Date
Box 316, Bowie, Arizona 85605

State of Arizona, County of Cochise
Subscribed and sworn to before me on this
8th Day of February 1990
Notary Public
Notary Expiration Date June 6, 1993

FEE # 900202571
OFFICIAL RECORDS
COCHISE COUNTY
DATE HOUR
02/09/90 11
REQUEST OF
KLUMP, WAYNE
CHRISTINE RHODES-RECORDER
FEE : 9.00 PAGES : 1
DOCKET 423 PAGE 674
900202571

Fee No 678 Fee 9.00

STATE OF ARIZONA, County of Graham--ss.
I do hereby certify that the within instrument was filed and recorded at the request of Wayne Klump
on Feb. 23, 1990 at 3:30 o'clock P M. Docket 423
Page 674 Records of Graham County, Arizona. Indexed in Misc.
Witness my hand and official seal the day and year first above written.
SHIRLEY ANGLE, County Recorder
By Shirley Angle Deputy

CLAIM

The Klumps claim the following described real property in Graham County Arizona, in its entirity:

All of Sec. 8,9,10,11,12,13,14,15,16,17,20,21,22,23,24,25,26,27,28,29,32,33, 34,35,36; E½E½ Sec. 7; E½E½ Sec. 18; E½ Sec. 19, E½ Sec. 30; E½ Sec. 31; SE¼ Sec. 1 All in T.11S. R.27E.
All of Sec. 32,33,34,27, SE½ Sec. 31; W½ Sec. 35; W½SW¼ Sec. 26; S½ Sec. 28 Allin T.10S. R.28E.
All of T.11S. R.28E.
All of Sec. 16,17,20,21,22,27,28,29,32,33,SW¼SW¼ Sec.4; S½SE¼ Sec.5; E½ Sec.8; W½SE¼ Sec.9; W½ Sec.15; SE¼ Sec.18; E½ Sec.19; E½ Sec. 30; E½ Sec. 31; W½, NE¼ Sec. 34; All in T.10S. R29E.
All of Sec. 3,4,5,7,8,9,10,11,13,14,15,16,17,18,19,20,29,30,31,32; SW¼, W½SE¼, S½SE¼SE¼ Sec.6; S½, NE¼, S½NW¼ Sec. 12 All in T.11S.R29E.
All of Sec. 7,18 in T.11S. R.30E.

Our claim and rights date back to 1880 (Eighteen hundred eighty)and are legally acquired and grandfathered. We claimthis property as our private property. We claim all minerals, coal, oil, gas, water, geothermal, gravel, and all known and all unknown substances to th e center of the earth. We claimthe air, air space, water, gasses, all living things, all dead things, and all substances to the heavens and beyond. We claim the right to store and use any and all substances on, above, and under said lands. We declare that this land is outside of any government or governmental agencys control or jurisdiction. The government, city, local, county, state, or federal, shall have no claim whatsoever to any of th e above described property. This land shall not be subject to emminent domain, taking seizure, steal, or wh atever name or method th at the government migh t use to take our property away. Legal access shall be on a temporary and lease basis only. There shall be no hunting, fishing, trapping, or trespassing without prior written permission. Klumps shall not be liable or responsible for damages to anyone. We base our claim on continuous and uninterrupted use. Th e intent of the Constitution of the United States of America and the Homestead act was to put all lands into private ownership.

STATE OF ARIZONA, County of Graham, as Fee $ 9.00 No. 527
I hereby certify that the within instrument was filed and recorded at request of L. Klump 2-8-90 3:15 P.M.
In Docket No. 423 Page 415 and indexed in Claims
Witness my hand and official seal the day and year aforesaid.
SHIRLEY ANGLE
COUNTY RECORDER BY Deputy

L. Klump
L. KLUMP Date

State of Arizona, County of Graham
Subscribed and sworn to before me on this 8th day of February 1990
Notary Public
Notary Expires 5/10/92

Book 423 Page 415

FEB 09 90 11AM E 2
5.00

CLAIM

The Klumps claim the following describ ed real property in Cochise County Arizona in its entirity .

All of Sections 1,12,13,14,15,16,22,23,24,25,26,35,&36 SE¼ Sec.8; S½Sec.9; [illegible] SE[illegible]; [illegible] All R.31E.
All of T.13S. R.32E.
All of Sec.5,6,10,11 N. of S.P.R.R. R.O.W. All in T.14S.R.32E.
S½Sec.32; W½Sec.35; All R.32E.
All of Sec. 2,3,4,5,6,7,8,9,10.16; W½Sec.15, N½Sec.17, N½Sec.18, NW¼Sec.21, All in T.14S. R27E.
All of Sec. 1,12,15,16,17,20,21,22,28,29,32,33, N½,N½SE¼Sec.13;N½Sec.14; S½, ; SW¼Sec.23; W½, W½NE¼Sec.34; S½S½Sec.30; ¼, N½NW¼Sec.31 All in T.14S. R.26E.
All of T.13S. R27E.
All of T.12S. R27E.
All of Sec. 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,20,21,22,23,24,25,26,27, 28,34,35,36, N½, SE¼Sec.19; N½NE¼, SE¼NE¼Sec.29; mstsee.33; T.13S. R26E.
All of Sec. 31,32,33,34,35,36, S. of S.Y.R.R. R.O.W. All R26E.
All of sec.36 S. Of S.P.I in T12S. R25E.
All of Sec. 1,12,23,26,27,33,34,35, All of Sec.2 S. of S.P.R.R. R.O.W.; N½Sec.11; S½Sec.14; S½SW¼Sec.13; S½, N½ SW¼Sec.21, E½, E½W½, SW¼NW¼Sec.22; S½, S½N½Sec.28; SE½Sec.29;E½NW¼, S½NE¼, N½SE¼, SE¼SW¼Sec.32 All in T13S. R25E.
N½NW¼, NW¼N½, S½NW½Sec.3; NW¼Sec. 4,E½NE¼,E½NW¼, 5; S½SW¼Sec.6 All in T14S. R.25E.
All of Sec. 1,3,6,7,8,9,10,18,19,30,31, S½, NE¼Sec.2; W½Sec.4; E½Sec.5; N½Sec.11; N½Sec.12; SE¼,SE½NE¼, S½SW¼Sec.13;NW¼, N½NE¼Sec.16; S½NW¼Sec.17; SW¼Sec.20; N½, SE¼Sec.24; W½Sec.29; NW¼Sec.32 All R.28E.
All of Sec. 22,26,27,35, E½Sec.21; E½Sec28; S½Sec. 32; W½, W½E½Sec.33; S½Sec.23 All in T.12S. R.32E.
S½NE¼Sec.1 T.15S. R27E.
SE¼Sec.19; SW¼Sec.20; all of Sec.29,30, All in T.14S. R.28E.
All of Sec. 18,30; N½ Sec.19 All in T12S. R.29E.
W½Sec.6; SW¼,W½SE¼Sec.5; W½, NW¼NE¼Sec.8; E½SE¼, SW¼SE¼Sec.10; SW¼, S½SE¼Sec.11; S½SW¼Sec.12; NE¼NW¼, SE¼SW¼Sec.14; NW¼, SW¼, NE¼ Sec.15; N½Sec.25; S½Sec.27; All of Sec. 34; SW¼, S½NW¼Sec.35; SW¼, S½SE¼NE¼Sec.36 All in T.13S. R28E.
N½, N½SW¼Sec.16; W½Sec.17; S½, E½NE¼, SW¼NW¼, E½NE¼, E½W½NW¼Sec.18; NW¼, SE¼, S½NE¼, N½SW¼Sec.19; NE¼Sec.21; S½SE¼Sec.25; S½Sec.26; S½NW¼Sec.27; S½Sec.28; N½, E½NW¼, NW¼NW¼, NE¼SW¼Sec.29; W½, W½E½, E½SE¼, SE¼NE¼Sec.30; All of Sec.31, 33,35,36; N½, SW¼Sec.34 All in T.13S. R.29E.
All Sec.5,6,7,12,13,14,15,20,21, W½Sec.11; S½,N16; E½, N½NW¼Sec.17; E½E½Sec.19; NE¼Sec.30; N½Sec.29 AllinT.14S. R.29E.
S½Sec.6; All of Sec.7,18.All in

PEE # 900202570
OFFICIAL RECORDS
COCHISE COUNTY
DATE HOUR
02/09/90 1 1
OF
REQUEST
KLUMP, WAYNE
CHRISTINE RHODES-RECORDER
FEE : 9.00 PAGES : 2

900202570

CLAM page 2

Our claim and rights date back to 1880 (Eighteen hundred eighty) and are legally acquired and grandfathered. We claim this property as our private property. We claim all minerals, coal, oil, gas, water, geothermal, gravel, and all known and all unknown substances to the center of the earth. We claim the air, air space, water, gasses, all living things, all dead things, and any and all substances to the heavens and beyond. We claim the right to store and use any and all substances on, above, and under said lands.
We declare that this land is outside of any government or governmental agency's control or jurisdiction. The government, city, local, county, state, or federal shall have no claim whatsoever to any of the above described property. This Land shall not be subject to emminent domain, taking, seizure, steal, or whatever name or method that the government might use to take our property away. Legal access shall be on a temporary and lease basis only.
There shall be no hunting, fishing, trapping, or trespassing without prior written permission. Klumps shall not be liable or responsible for damages to anyone. We base our claim on continuous and uninterrupted use, and the intent of the Constitution of the United States of America and the homestead act was to put all lands into private ownership.

W. Klump
W. KLUMP

State of Arizona, County of Cochise
Subscribed and sworn to before me on this
4th day of February, 1990.

Notary Public

Notary Expiration Date June 6, 1993

900202573

51

THE NATURE CONSERVANCY

New Mexico Field Office 107 Cienega Street, Santa Fe, New Mexico 87501 • (505) 988-3867

RECEIVED
BUREAU OF LAND MANAGEMENT
MAR 23 1990
SAFFORD DISTRICT

	ACTION	INFO	INITIAL	DATE
DIST. MGR				3/28
P.I.O.				
P.&E.C.				
ADM.				
OPERS.				
GILA				
SAN SIMON				
FILE		DISCARD		

March 20, 1990

Ray A. Brady, District Manager
Safford District Office
Bureau of Land Management
Safford, AZ 85546

Dear Mr. Brady:

Thank you for your letter of February 28 explaining your position on the San Simon Cienega.

As noted in the excerpt that I provided you from my 1990 report to the BLM, Potential Biological Special Management Areas in the Mimbres Resource Area (pp. 99-101), recommendations for protection designation for this site are complicated by the fact that the San Simon Cienega overlies two states and, therefore, is under the jurisdiction of two BLM Districts. The cienega, of course, should be considered as an integral biological unit, irrespective of political boundaries. Since the final decision on management of the cienega rests with the Las Cruces District and will be enunciated through the Mimbres Resource Area Management Plan which is due to be released in 1992, we ask that the Safford District RMP include a statement to the effect that the San Simon Cienega was considered for ACEC status but not designated pending further evaluation under the Mimbres RMP planning process.

The other concern of the New Mexico Nature Conservancy relates to the proposed Guadalupe Canyon ONA ACEC, the management of which, again, should involve both Arizona and New Mexico BLM Districts. Enclosed are copies of pages 82-84 from my 1990 report to the BLM cited above. You will note that we have recommended that the entire 3,691-acre existing Outstanding Natural Area be designated as an ACEC, with a boundary that would include both the New Mexico and Arizona portions of the ONA.

51-1 Apart from that recommendation, we urge that more of Baker Canyon and its drainage be included in the final RMP. My visit to Baker Canyon with Safford District personnel in May, 1986, convinced me that at least the lower three miles of the canyon contains important biological values that are complementary to the main Guadalupe Canyon. At a minimum we recommend that T24S R32E Sec. 2 and 11 and T23S R32E South 1/2 Sec. 35 be included in the final ACEC. This is a small portion of the much larger ACEC proposed under Alternative B in the Draft RMP. We do not have sufficient information to comment on whether more of the Alternative B ACEC lands should be included in the final designation.

Ray A. Brody
March 21, 1990
Page 2

51-2 We agree with the proposed management prescriptions for the Guadalupe Canyon ONA ACEC contained in your Preferred Alternative with the following exception. The livestock prescription should include additional language as underscored, "develop and implement an allotment management plan to manage livestock that will minimize impact on riparian zones." In general the Draft RMP appears to be well thought out and easily understood. We commend the planners for their careful consideration in recommending protection measures for critical biological resources.

We appreciate the opportunity to comment plan. Please retain the New Mexico Field Office of Conservancy on your mailing list for the Safford District.

Sincerely,

William W. Dunmire
Public Lands Coordinator

WWD/as

cc: Area Manager, Mimbres Resource Area, BLM
Peter Warren, AZFO

GUADALUPE CANYON, HIDALGO COUNTY

Guadalupe Canyon, located at the southern end of the Peloncillo Mountains in the southwest corner of New Mexico, is known as one of the premier areas in the U.S. for diversity of bird species including many that are only known from this canyon and a few other sites. The area was recommended for consideration for special management by virtually every biologist that was contacted in advance of the survey. A biological investigation was conducted for The Nature Conservancy by Esteban Muldavin in 1987 and the canyon was visited by Dunmire in May, 1986. Because of these visits and numerous other records from previous investigations, another site visit in 1989 was not deemed necessary.

[redacted]

The overlapping of Chihuahuan Desert, Sonoran Desert and Sierra Madrean bio[redacted]ic provinces coupled with perennial flowing water in Guadalupe Canyon results in extraordinary biological diversity and many sensitive or endangered species. The riparian zone at the bottom of the canyon is [redacted]ed by a gallery forest dominated by Arizona sycamore and Fremont cottonwood which border the creek bed and are occasionally found on small alluvial terraces. Netleaf hackberry and Arizona walnut are common along the perimeter of the gallery forest and velvet ash, soapberry, and Goodding willow are also common tree components. On the drier, more elevated terraces mesquite bosques are dominated by velvet mesquite. The immediate side slopes and uplands become woody shrublands dominated by redberry juniper and velvet mesquite in combination with numerous shrubs including sotol, beargrass, cholla, Yucca schottii, and Anisacanthus thurberi, among many others.

Vauquelina pauciflora, a State Endangered, Federal Candidate plant, is known in New Mexico only from this area. There are no known other Federal or State listed endangered plants but a number of State listed Sensitive plants occur here including Anisacanthus thurberi, Cerastium texanum, Ipomopsis macombii, Oxalis pilosa, Penstemon superbus, Sageretia wrightii, Senecio salignus, Sphaeralcea emoryi and Yucca schottii.

The listed animals in Guadalupe Canyon and vicinity are even more impressive. The area is noted for its high diversity of bat species including the southern yellow bat, a State Endangered mammal. But it is the avifauna for which Guadalupe Canyon is noted worldwide. The State Endangered birds that are regularly or occasionally found here include Bell's vireo, buff-collared nightjar, common black-hawk, elegant trogan, Gila woodpecker, four species of hummingbirds (violet-crowned, lucifer, broad-billed and Costa's), northern beardless-tyrannulet, thick-billed kingbird, and varied bunting. State Endangered amphibians include the Colorado River toad. State Endangered reptiles found here are the green rat snake, Gila monster, mountain skink, and giant spotted whiptail.

Other Resource Values

Undoubtedly archaeological and other cultural resources exist here but no survey

Relevance and Importance

This area clearly meets the relevance criteria because it has significant wildlife resources in the numerous species that enter the U.S. from Mexico including many threatened and endangered animals. The area meets the importance criteria because of the national significance of the avifauna and unique botanical and plant community resources. The area was evaluated for National Natural Landmark status in 1982 (Dick-Peddie, 1982) and was judged to have the highest national significance.

~~Special Management Attention~~

This area currently is designated as an Outstanding Natural Area which restricts energy mineral leasing (USDI, 1976). The New Mexico portion of Guadalupe Canyon is adjacent to an ACEC proposed in the Preliminary Draft Safford Resource Area Management Plan which is currently under public review. It is recommended that management prescriptions for this ACEC parallel those for the adjacent ACEC in Arizona. Private inholdings should be acquired as they become available.

~~Current Land Use~~

The proposed ACEC is surrounded by a combination of private and public land. Livestock grazing and public recreation, mainly birdwatching, is the principal land use. The proposed Guadalupe Canyon ONA/ACEC in the BLM Safford District is on adjacent land in Arizona to the west.

~~Boundary Recommendations~~

The entire area within the existing Outstanding Natural Area is recommended for ACEC designation, a total of 3,691 acres. This boundary includes both the New Mexico and Arizona portions of the ONA. The Draft Safford District RMP/EIS proposed the Arizona portion as an ACEC (USDI, 1989c). A map is not included in this report, since the boundary is contingent upon the final Safford District RMP.

Further Study Needed

None known at this time.

Evaluation Summary

This area is highly recommended for ACEC designation because of the extraordinary diversity of plant and animal species coupled with the great number of endangered animals, especially birds.

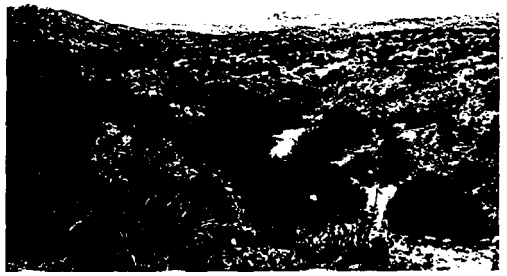


Photo 43. The overlapping of the Chihuahuan Desert, Sonoran Desert and Sierra Madrean biogeographic provinces results in extraordinary biological diversity Guadalupe Canyon ACEC.

Photo 44. The sycamore-dominated riparian area of Guadalupe a migration corridor for wildlife species.

BUREAU OF LAND MANAGEMENT
SAFFORD DISTRICT OFFICE
425 E. 4th STREET
SAFFORD, ARIZONA 85546

(602) 428-4040

1610
~~1600~~
(045)

FEB 28 1990

Mr. William W. Dunmire
The Nature Conservancy
New Mexico Field Office
107 Cienega Street
Santa Fe, New Mexico 87501

Dear Mr. Dunmire:

Thank you for your letter on the Safford District Resource Management Plan and, more specifically, on the San Simon Cienega.

As background information, the Safford District has never received any formal ACEC nominations from The Nature Conservancy on the San Simon Cienega. The listing in the Draft RMP was in reference to an informal in-house nomination for which no supporting documentation was ever supplied. Since this was an informal nomination, it probably should not have appeared in the Chapter 3 table.

We reviewed the area, however, and did not feel that the San Simon Cienega met the relevance and importance criteria. While we felt that there may be some wildlife values in the area that could meet the relevance criterion, we did not have enough hard data to confirm that. We did not know of anything that would meet the importance criterion. TNC's own nomination to the Mimbres Resource Area seems to reflect our conclusions. Our conclusions should have been included in the Draft RMP but were inadvertently omitted.

As to the request on background information on the Arizona portion of the San Simon Cienega, the Las Cruces District would be the best source. The Las Cruces District manages those public lands in Arizona that are part of the San Simon Cienega and they would be the source of any resource data. The Arizona Game and Fish Department in Tucson (Rick Gerhart (602) 628-5376) may have some additional information on this area.

I hope this letter gives you the information you need. If you have any additional information that might cause us to re-evaluate this area, please let us know. Also, if you have any further questions, please give me or Pete Zwaneveld a call.

Sincerely,

Ray A. Brady

P2WANEVELD/od:02/27/90:0444X

THE NATURE CONSERVANCY

New Mexico Field Office 107 Cienega Street • Santa Fe, New Mexico 87501

RECEIVED
BUREAU OF LAND MANAGEMENT
FEB 05 1990
SAFFORD DISTRICT
ACTION INFO INITIAL DATE
DIST MGR
P.L.O.
P.E.C.
RESOURCE
DIST. MGR.
RECEIVED

January 30, 1990

Mr. Steve Knox, RMP Team Leader
Bureau of Land Management
425 E 4th Street
Safford, AZ 85546

Dear Mr. Knox:

We appreciate receiving a copy of the Draft Safford District Resource Management Plan/EIS. Before we formally comment on the plan, I need some additional information.

The San Simon Cienega is a riparian wetland that was originally nominated for ACEC consideration. Table 3-5 (p. 150) of the draft states that the area is not qualified for ACEC study. There appears to be no explanation or rationale for this in Appendix 2-ACEC Evaluations.

The New Mexico Nature Conservancy has just completed an evaluation of the BLM Mimbres Resource Area for potential special management areas. The New Mexico portion of the San Simon Cienega was one of 29 sites identified and evaluated, per the enclosed copy from my report.

Please provide me with background information on the Arizona portion of the San Simon Cienega (including the CCC Lake area) which would have led to your conclusion that the relevancy/importance criteria for ACEC designation is not met here.

Sincerely,

William W. Dunmire
Public or

WWD/as

cc: Pete Warren, AZFO

Enclosure

POTENTIAL BIOLOGICAL
SPECIAL MANAGEMENT AREAS IN THE
MIMBRES RESOURCE AREA, BUREAU OF LAND MANAGEMENT

A survey to identify and evaluate sites within
the Mimbres Resource Area that may meet the
agency's relevance/importance criteria for designation as
Areas of Critical Environmental Concern

Prepared for the Bureau of Land Management

by
The Nature Conservancy
New Mexico Field Office
William W. Dunmire, Principal Investigator

January 15, 1990

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SAN SIMON CIENEGA, HIDALGO COUNTY

This area, about 15 miles north of Rodeo, NM, was once a productive waterfowl site. The New Mexico Dept. of Game and Fish constructed a lake and several ponds in the late 1940's but San Simon Creek stopped flowing in 1952, probably due to the pumping of the subsurface water table for agricultural irrigation. In 1966 NM G&F along with AZ F&G initiated a program aimed at restoring habitat for the Mexican duck which was Federally Listed at the time. When the Mexican Duck was removed from the Endangered Species List in 1978, the expensive pumping of water to fill the cienega was halted. Cottonwoods died, dikes were breached and the area gradually lost much of its riparian character. Today the only large body of permanent water is CCC Lake on San Simon Creek on the Arizona side. The area was recommended for consideration for special management largely based on a high degree of [redacted] in this site in the past and the numerous records of endangered animal species, mostly dating back to the time when true cienega conditions prevailed. The area was visited by Dunmire and Barlow on August 14, following the overflight of the area by Dunmire, Florence and Wootten, on July 12, 1989.

Biological Values

Today a few shallow ponds remain on the New Mexico side, most of which are silting in and being infiltrated by cattail and salt cedar. There are stands of Fremont cottonwoods on higher ground on the east side of the old cienega but there is no sign of younger trees or cottonwood reproduction. Bordering the shallow ponds and cattail marshes is a mesquite/alkali sacaton grass habitat type with a low diversity of forbs especially annuals such as sunflowers. Grazing impacts are heavy in this zone. The higher ground surrounding this cienega supports a mesquite/creosote bush habitat type typical of the desert pavement in this region.

In 1986 Dunmire observed a black-shouldered kite roosting in the cottonwoods at the southern end of the cienega. In 1989 Merhege (pers. comm.) reported three pairs of Harris hawks in the area, an increase over previous recent years. The area probably still supports a population of Bell's vireos, a State Endangered species, and the presence of State Endangered ground-doves, is still probable within the general area. However, it is unlikely that other endangered species formerly found here such as the Gila chub and olivaceous cormorant are present in the area today.

~~Other Resource Values~~

San Simon Creek is rich in pueblo period archeological
known survey for the cienega area.

Relevance and Importance

Because of deterioration of this the y- it is difficult to make a case for San Simon Cienega meeting the relevance

for a biological ACEC. If the 1/3 of the cienega that spills into Arizona were to be included, a stronger case could be made. However, the Safford Resource Area has declined to designate this as an SMA in their current Resource Management Plan, therefore only the New Mexico portion could be considered here. In 1974 the area was evaluated and recommended for designation as a National Natural Landmark (Potter, 1974) but changes here over the past 15 years surely have lowered the significance of this area.

Special Management Attention

The Las Cruces/Lordsburg MFP Amendment/EIS (USDI, 1983) established restrictions on energy mineral leasing in the cienega to protect wildlife and riparian habitat. In 1981 the San Simon Cienega Habitat Management Plan was revised with new objectives including waterfowl habitat management, terrestrial management for deer and javelina, emphasis on avifauna, and limited recreation. This plan called for the reduction of water use and discontinuation of pumping.

Current Land Use

The area surrounding the potential ACEC is a combination of public, state and some private land. Current general use of this are is low intensity ranching.

Boundary [redacted]

A precise boundary is not recommended here since the Safford, AZ, Resource Area has stated that the portion of the cienega in Arizona should not be included in any proposed ACEC (Zwaneveld, pers. comm.). The two Resource Areas need to come to some kind of agreement before a boundary can be proposed.

~~Evaluation Summary~~

The area is marginally recommended for ACEC designation because of the riparian and cienega community which supports a large number of waterfowl and other bird species, assuming that an agreement can be made with the Safford Resource Area to give the entire cienega special management attention.

52

the Warne Company

March 23, 1990

Bureau Of Land Management
425 E. 4th street
Safford, AZ 85546

Att": Steve Knox

I have reviewed the Safford District Resource Management Plan Environmental Impact Statement Draft dtd January 1990, and submit comments herein.

I am sympathetic to the desire for BLM to designate areas and to "block up" land ownership to accomodate/facilitate the federal programs and charge. However, as a" owner that has invested rather heavily in lands within two of the proposed areas I am a little more than concerned about the negative financial impact the BLM program will no doubt have on future values of private lands within the subject areas prescribed by BLM. Zoning and use of the properties will unquestionably be influenced by BLM presence along with their program(s), thereby stiffling opportunities for development within the private sector. It seems that such a" owner would have little or no option regarding the use of his property other than trade it, at a value controlled mostly through the market made primarily by BLM, for other properties that BLM has designated as disposable. Much of the disposable properties that remain available are light years from being of use to anyone, if ever. The present methodology of property appraising predicated on the free market system is abrogated under this plan, leaving the private land owner to decompose financially.

Other comments regarding the draft:

(1) Alternative A - Summary page iii 2nd pare:
. . . ..provide *moderate* benefits to vildlife habitat and high benefits to riparian vegetation.

52-1

Observation: Appears to me to be a somewhat contradictory statement.

4455 East Camelback Road • Suite 290E • Phoenix, Arizona 85018 • Telephone (602) 952-8312

(2) Alternative A - Summary page iii 4th pare:
. . ..restrictions on mineral material sales would have a low impact on segments of the local economy dealing with materials extraction and exploration.

Observation: This is a general statement which I'm sure with adequate research would be found to be Untrue in one or more specific instances.

Thank you for this opportunity to comment.

J.E. Warne, Jr.

JWJ/gg

53

Western New Mexico University

Faculty Senate

22 March, 1990

To Whom It May Concern:

I am writing in regard to protection of the Eagle Creek Bat Cave. I am familiar with the cave, having worked there in the early 1960's. We spent 3 or 4 days banding 35,000 Tadarida brasiliensis at that time. Band returns from these came from as far away as Sinaloa, Mexico; Carlsbad and Silver City, New Mexico. The evening flight was a spectacle that I shall never forget. We estimated about 6 to 8 million bats occupying the cave at that time. We calculated the amount of food consumed each night based on size, amount and kinds of insects. Our estimate was that 40 tons of insects were consumed each night. From the direction and heighth of flight, we suspected that the main feeding area was over the Safford Valley. The few food samples that we took included mostly weevils.

Keeping this in mind, I think it is important that an ACEC be established in the vicinity of the bat cave to protect this valuable resource. And, I think it is important that a fence as well as a very substantial gate be established around the cave entrance to exclude people. The preservation of this colony is obviously important, not only for esoteric and biological reasons, but for the benefit of the farmers and ranchers down stream. I urge the authorities in charge to do whatever is possible to keep the colony at maximum potential. There are relatively few large ~~Tadarida~~ roosts in the Southwest and each needs to be taken care of, left unmolested and protected. The larger the colony, the greater the benefit to nearby communities.

As an incidental aside, I applaud any effort to set aside a portion of the Eagle Creek riparian forest for protection. The other wildlife of these uncommon places are important to our culture and life. As human population increases more and more in Arizona and New Mexico, these places become increasingly important to our heritage and well being.

Thank you for your attention.

Sincerely yours,

Bruce J. Hayward

BRUCE J. HAYWARD
Prof. Biol. Sci.
Western New Mexico Univ.

P.O. Box 680 Silver City, New Mexico 88062

54

March 24, 1990
1038 Paseo Quinta
Green Valley, AZ.85614

Dear Mr.Knox:

Since you are the Safford District RMP Team Leader, I am addressing my letter to you. Of the four alternatives outlined in the latest RMP, I wish to tell you that I support Alternative B and why:

1) It would benefit and protect 4000 acres of reparian vegetation.

2) It would restrict the use of 1,400,000 acres to "off hiway vehicles"..

3) Through proper management, it would help to improve over 101,000 acres of wildlife habitat.

4) It would Close areas that are important to Big Horn Sheep lambing time and to their protection.

5) It would protect archaeological and palentological sites.

6) It would restrict and control the grazing of cattle in critical areas.

And since the Arivipa and Muleshoe areas are such unique places, I hope I can help preserve them for my grandchildren to enjoy in the future as I have enjoyed them at this time.

It is also my hope that the BLM and the Nature Conservency will work together closely to help preserve the issues on this bill. Please support the Alternative B.

Thank you.

Sincerely,

Helene S. Kuiken

55

JANE DOW
1413 W. Camino Del Pato
Green Valley, AZ. 85614

March 22, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ. 85546

Dear Mr. Knox:

I'm writing this letter in hope that it doesn't fall on "deaf" ears. My concern is that in today's world with the pressures to "progress" we overlook the "down-the-road" results.

The Alternative B plan, in my estimation, seems to best protect the wilderness habitat. The riparian areas, particularly in Arizona, are so important. The vegetation in them helps with the eco balance.

The wildlife would be protected during critical periods from harassment. The big horn need the undisturbed lambing-nurturing time free from human interference.

Unrestricted cattle grazing in critical areas also needs control. Since they roam freely they are able to graze and trample delicate growth needed in the future.

I also would be happy to see large scale restrictions placed on OHV use. Unfortunately many OHV owners do not care about the wonderful landscapes available to them. They are "pirating" many of the plants, shrubs, trees, cactus, etc., from these areas. Their tire tracks and litter are disgusting. As a hiker, I've seen what they do.

I support alternative B plan because it best preserves the ARAVAIPA and MULESHOE areas. Generations from now will be able to enjoy this area if we act wisely non.

I do urge the BLM work closely with the Nature Conservancy, accepting their advice and help.

Sincerely

- p - L - -

Jane Don

56

Robert E. Lund
1601 West Placita Embate
Green Valley, Arizona 85614

23 March 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 East Fourth Street
Safford, AZ 85546

Dear Mr. Knox:

I am writing relative to the Safford District Resource Management Plan (RMP).

Plan B is the best of the four alternatives. This plan protects the wilderness habitat, wildlife, and flora.

Perhaps its most important feature is that Plan B restricts off-highway vehicle use, closing 1,400,000 acres to such vehicles. It, also, closes bighorn sheep lambing areas (decreasing human harassment during critical periods), and restricts cattle grazing in critical areas.

Other important features of Plan B are that it benefits 4000 acres of riparian vegetation and improves wildlife habitat by management of over 100,000 acres.

In particular I support Plan B because it best preserves the Aravaipa and Muleshoe Reserves. If we act wisely now, future generations will benefit and be able to enjoy the outdoor experiences we have known.

In conclusion, I urge the BLM to work closely with the Nature Conservancy and accept their sage help and advice.

Sincerely,

Robert E. Lund

Robert E. Lund

57

W.J. McMURRAY, MBU 10111
3150 S. CALLE MADRID
GREEN VALLEY, AZ 85614

March 25, 1990

Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Attention: Steve Knox,RMP Team Leader

Dear Mr. Knox:

I read in yesterday's paper that BLM and the Nature Conservancy had signed a pact toward the goal of protecting our ecosystems on 270 million U.S. acres.

I hope that this means for Muleshoe and the Aravaipa areas that plan "B" alternative will be chosen. I am particularly concerned with the Off Highway Vehicles and the destruction to the land caused by those who use them.

Having been a volunteer with the Coronado Forest Service for five years I have discovered that each person seems to want his particular form of recreation every place he goes. I feel that if he wishes to ride horses or a roller coaster he should go to where those are available. Certainly once our natural resources are destroyed there is no way to get them back.

I SUPPORT RESOURCE MANAGEMENT PLAN "B". Thank you.

Yours truly,

Wm. J. McMurray

58

via Del Petirrojo
Green Valley, Arizona, 85614
March 26, 1990

Mr. Steve Knox
Bureau Of
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Knox:

I wish to express my concern regarding the Safford District Resource Management Plan. Of proposed for the future development of this district, I am in support of Plan B. Plan B appears to he the most viable alternative for protecting the wilderness habitat because it restricts off highway vehicle use, thus protecting vegetation which in turn stabilizes the environment for wildlife and flora. It also provides for the best protection of archaeological sites.

I would also urge the Bureau of Land Management to work closely with The Nature Conservancy to maintain these areas for us and future generations. If we act wisely now, everyone should benefit.

Sincerely yours,

DeWayne Triplett

59

March 5, 1990

Mr. Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Knox:

In reveiwing the Draft RMP, the Bowie Chamber of Commerce encourages the BLM to designate the Hot Wells Dunes as a special recreation management area.

In the proposal that the rancher, Pete Brawley has presented to you it appears that all interests could be met. The need for recreation would be limited to 1700 acres therefore protecting the rest of the resource from off road vehicles. Grazing rights would be secured with adequate water being placed on private land for cattle. And most importantly wildlife would be assured of less intervention by people as they would logically move out of the area and down into the San Simon to take advantage of the newly created water source.

Bowie Chamber of Commerce needs would be met also. Bowie is the gateway to the area and further recreation in our area would benefit our local economy.

In the future it will be compromises such as this by all interests that will maintain multiple use of our public lands as mandated by Congress.

Sincerely,

BOWIE CHAMBER OF COMMERCE

Bud Eyrich

Bud Eyrich, President

BE:tb

60

March 26, 1990

Steve Knox,RMP Team Leader
Bureau of Land Management
425 E 4th Street
Safford,AZ 85546

Dear Mr Knox,

I strongly support Alternative B for preservation of the Aravaipa and Muleshoe Areas. Also urge you to work closely with the Nature Conservancy of which I am a member.

Thank you.

Sincerely yours,

Robert Buchsbaum
POB 781
Green Valley,AZ 85622

61

Draft Safford District Resource Management Plan
Public Comment Form

Issue/Management Concern: BLACK ROCK WILDERNESS PROPOSAL

Comment: I would like to protest the inclusion of the area you refer to as Jackson Mountain Wilderness as part of the Black Rock Wilderness Proposal.

The reasons being:

61-1 1. I, as the lessee of Jackson Mountain allotment (which makes up 60% of the proposed wilderness) was not notified of the pending inclusion into a wilderness status.

2. In my opinion, it isn't suitably located to qualify for wilderness designation. There are several man made tanks and roads crossing into and out of the area in several directions. Also there are developed springs and pipe lines that need to be maintained for the benefit of cattle and wildlife. Older members of this family have helped on this ranch for the last thirty some years, but the change in status will pre- their participating in ranching activities if roads are eleminated.

In the Safford District Resource Management Plan, Environmental impact statement book, on page 92, Black Rock RNC-ACEC, alternative B, I think is very wise. The reason being it is a very scenic and sensitive area.

Name: Rodney Alder
Representing: Self
Address: P.O. Box 457
Pima, Arizona 85543
Date: March 27, 1990

62

March 27, 1990

District Manager, Safford District
Bureau of Land Management
425 East 4th
Safford, Arizona 85546

Dear District Manager:

The OsoLargo Detention Dam has done an excellent job in protecting a large part of Bear Springs flat from erosion. The two washes that run into it, Matthewsville and Tripp-Underwood, were huge cuts ten feet deep and one hundred feet wide before the dam was built. Now the Matthewsville wash is a three foot wide three foot deep grassy ditch; and Tripp-Underwood has nearly leveled out for one quarter mile upstream. It would be a terrible waste to allow this structure to fail completely, all improvements upstreat would be lost. Downstream, if the dam failed during heavy rains it could be dangerous to the Eastern Arizona railroad and highway 70 as well as Dodge Nevada Canal. I sincerely hope that Bureau of Land Management can maintain OsoLargo as it shoud be maintained.

Sincerely,
Ray Ferguson
Ray Ferguson

63

March 24, 1990

13760 Tabeguache Road
Nathrop, CO 81236

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Knox:

After reviewing the Safford District Resource Management Plan/Environmental Impact Statement Draft, I would like to make a couple of comments as a consulting geologist interested in the field of economic geology.

There are not many BLM districts in the United States that contain mining districts with cumulative metal production in excess of $81 billion such as exists in the Safford District, yet only a small amount of space is devoted in the Draft to such resources. This past production plus unspecified nonmetal output and the potential for additional discoveries indicate that the Resource Management Plan should maximize the area available for exploration and mineral development where warranted.

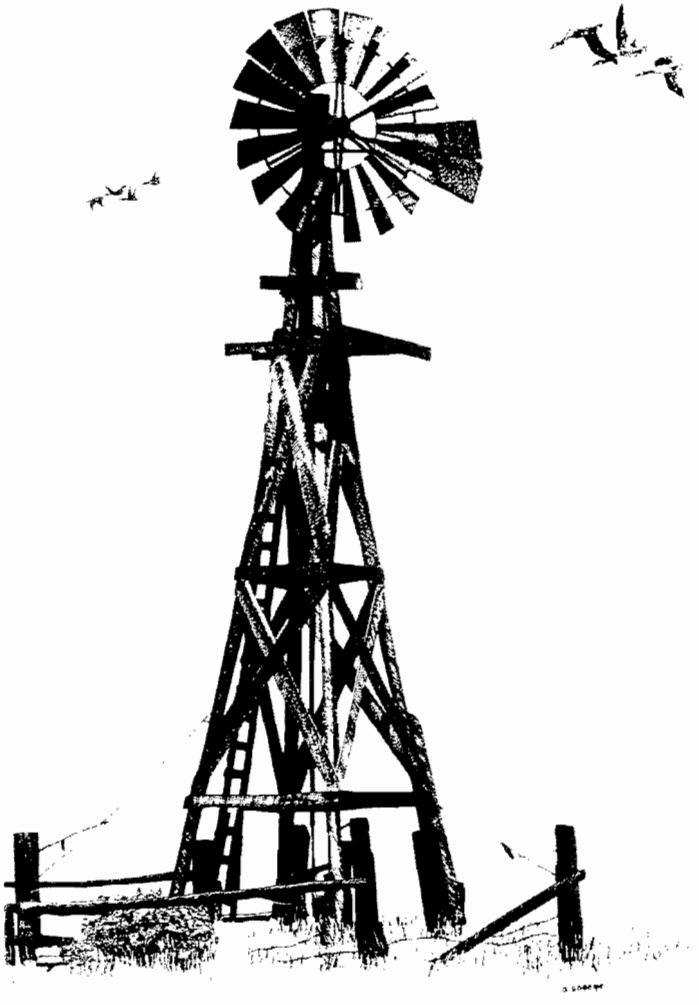
The value of mineral output cited in the Draft apparently does not include the significant amount of nonmetallic or industrial mineral commodities produced in the district. An example of this is the zeolite being mined in the San Simon Valley north of Bowie where production since 1962 is valued in excess of $40 million. This mineral resource is an important commodity for environmental cleanup and other beneficial uses, and its utilization should increase in importance with time.

63-1 I am uncertain from this Draft as to the impact a "Riparian Area" designation would have on future mining within that area. In particular, the zeolite resource occurring in San Simon Valley Riparian Area 37 warrants development as markets dictate, and I can see no justification to inhibit reasonable development in this area. Encouraging development of this unique resource should be a goal of this Resource Management Plan.

I am somewhat surprised at the large size of Riparian Area 37 shown by the "circle" on Map 34 compared with other so designated areas within the District. The area seems disproportionately large relative to the amount of stream drainage and man-made ponds in the area.

Sincerely,

R. W. Knostman



64

4754A La Villa Marina
Marina del Rey, Calif 90292
March 24. 1990

Steve Knox
RMP Team Leader
BLM, Safford AZ.

Dear Mr Knox:

Although I live in California. I visit Arizona often, and indeed plan to move there one of these days. Thus I feel I have a wee vested interest in all things Arizonian, including RMP reports. My normal Arizona wanderings take me to Organ Pipe, the Huachucas, the Chiricahuas, and to Aravaipa, the latter being one of the subjects in your RMP report.

One of the things that make Aravaipa so spectacular, is its remoteness and inaccessibility. If you want to see Aravaipa, you have to WALK!!. Although I am 58 years old, I still believe things worth seeing should take some effort, not a roll-by in a 4X4. And I am not against 4X4's...just the abuses which are sometimes horrendous. My motor home is a 4X4, and my city truck is also 4X4. I try and obey the rules, and wish most others did too. It is against the unthinking, uncaring empty heads that I rebel.

I applaud your earnest and well intentioned RMP effort. It is very ambitious. But just perhaps, given current manpower and budget realities, the loft of your goals could easily outstrip the reasonableness of their attainment. The report was very detailed, perhaps too much so to one outside the BLM and trying to get to the core issues. I would think it best to concentrate people and money on fewer goals and attain them. Wildlife habitat, not user/use, should be the primary goal for such a unique spot as Aravaipa.

64-1 I think the thing that strikes me the hardest about your Preferred Alternative insofar as Aravaipa is concerned, is on the matter of off road vehicle access. In your summary section, you talk of "the imprint of man's work is substantially unnoticeable throughout the [Aravaipa] wilderness area." It should be kept that way, which it will not if more and more peripheral areas are open to hunters and vehicular traffic. For example you propose closing sheep lambing areas from Feb 1 to April 30, and then reopening on a 'limited. basis. Why reopen at all. Why not close lambing areas year around so that the shy sheep know that they have some permanent territory. I also think your designation of the remaining 1.38mm acres to 'limited. OHV use opens up the possiblity of abuse on a grand scale. People in 4x4's in general LOVE getting off the roads and tracks to more remote areas. You cannot be expected to successfully patrol such a large area. I think more and more illegal roads will pop up, closing in on Aravaipa and its still pristine wildness.

On the other hand, I applaud your intent to include 6684 acres in the Rational Wilderness Preservation System.... to continue to file for instream flow rights....to consider Aravaipa Creek for Unique Waters designation (if A. Creek is not extra specially unique, I don't know what is!)...and your plans to purchase additional critical properties in the area. Those are all good and positive steps which could be easily overshadowed by the eventual

arrival of clouds of dust and new trails and destroyed habitat, all compliments of OHVs. The area surrounding Aravaipa is as sacred and needing of protections as the canyon itself. There are SO few Aravaipas in this world, please let's resist the political pressure to be all things to all people. Let's reshape our priorities a bit, giving the big nod to habitat and wildlife. Han can still walk. We have not lost that ability quite yet, although denizens of the earth in the middle of next century could well be born with 4X4 wheels where once there were legs.

I do not want to sound like a rabid environmentalist or elitist barring all People forever from wild habitat. Han has been part of the scene for thousands of years. But NOT his vehicles. I remember walking the canyon one early morning, and encountering a young family of four from Holland, who had camped overnight. They loved the spot, and the reason was because they heard no other people, and they had to make an effort to gain the pleasure. That's what the super unique wildlife areas are all about. The BLM and the Nature Conservancy have a sacred joint responsibility here. Please act as responsible conservators for the people of the next century, who hopefully will not have wheels permanently attached.

Thanks for your consideration,

Jack Wolf

65

Marion Kole

March 28, 1990

To: Steve Knox, RMP Team Leader

Re: Safford District Resource Management Plan

Dear Mr. Knox:

I urge you to support alternate B of the four alternative plans that were outlined to best protect the wilderness habitat, wildlife, and flora. My reasons are as follows:

1. Restricts off highway vehicle use, closing 1,400,000 acres to O.H.V. use.
2. Benefits 4000 acres of riparian vegetation.
3. Improves wildlife habitat by management of 101,739 acres.
4. Closes big horn sheep lambing areas reducing human harassment during critical periods.
5. Protects archaelogical & palentological sites.
6. Restricts cattle razing in critical areas.

Alternate B. which I support, best preserve the Aravipa & Muleshoe areas so our children & grandchildren can hike and camp as we have done. You must act wisely now.

I further urge the BLM to work closely with the Nature Conservancy & accept their help and advice.

Sincerely,

Marion Kole

Marion Kole
Green Valley, Az.

66

March 29, 1990

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Hello Steve,

In my comments on the Safford District RMP EIS dated Feb. 15, 1990 I neglected to include one very important input. I am strongly opposed to the opening the 1708 acre Hot Well Dune area to off highway vehicles. No studies have been done to determine the unique wildlife values of the area and unique values can be anticipated in dune areas. It is the only significant dune area in Southeast Arizona. The BLM has no obligation to permit destructive recreation activities on public land that will destroy other imortant values. 66-1

Thanks for the opportunity to comment,

Jim Notestine

Jim Notestine
PO Box 461
Sonoita, AZ 85637

67

march 29. 1990

Mr. Steve Knox. RMP Team Leader
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Knox

We are writing with regard to the Safford District Resource Management Plan.

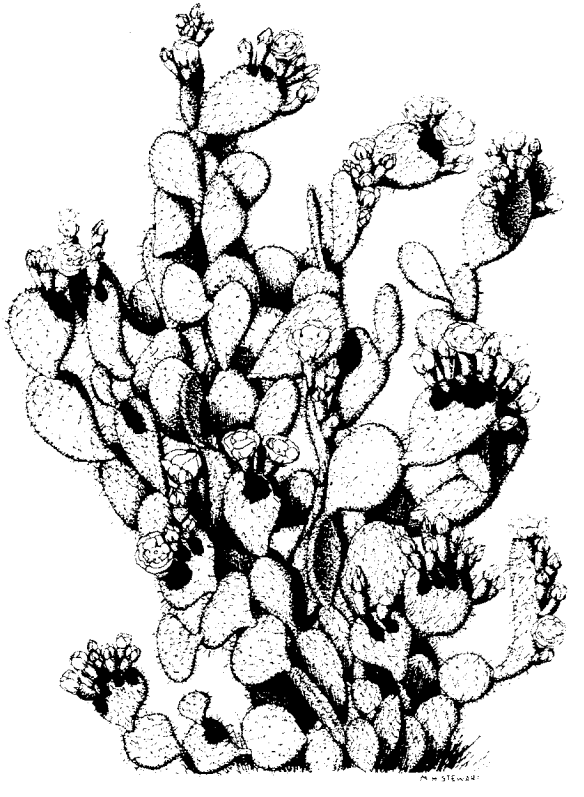
Of the four alternative plans outlined, we feel that alternate 8 best describes our interest in preserving the habitat. wildlife and flora of the Aravaipa and Muleshoe areas,

We are members of Friends of Madera Canyon and The Nature Conservancy and ask you to please work closely with the Conservancy and accept their help. As you know, Riparian areas need our protection NOW, for the sake of our future generations.

Sincerely,

Dorothy Miller
Jack Miller

Dorothy & Jack Miller
963 S. Las Lomas Circle
Green Valley. AZ 85614



68

March 28, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Knox,

I am writing this letter to comment on the Safford District Resource Management Plan and Environmental Impact Statement, which is the proposed plan for management of 1.4 million acres of public land in southeastern Arizona.

After reviewing the draft, I would like to say that I strongly support ALTERNATIVE B for the following reasons.

1. In general ALTERNATIVE B designates larger areas to Areas of Critical Environmental Concern and more protective management prescriptions, as well as recommending larger areas to Congress as wilderness and wild and scenic rivers.

2. Specifically I support the 179,220 acres of public land being designated for ACECs by Alternative B, as opposed to the 61,737 acres recommended by Alternative A.

3. I am opposed to "open" use of OHVs (off highway vehicles) on all public lands, and feel the limited use proposed by both alternatives of 1,300,000 plus acres should be sufficient for use by OHVs. However, I recognize the need of your organization to satisfy the needs of a variety of divergent interests, and could understand designating an area open to OHVs where the protection of wildlife and plant habitat was not a consideration.

4. I support the proposed acreage of 97,[illegible]6 acres recommended to be withdrawn from mineral entry by Alternative B as opposed to 29,104 recommended by Alternative A. I am especially interested here in the added acreage recommended for withdraw from mineral entry in Eagle Creek Canyon wherein lies Eagle Creek Bat Cave. I believe this Mexican free-tailed bat maternity cave needs maximum protection from outside disturbance, and I would support gating the cave with the appropriate gate to protect these bats from vandalism.

Recycled Paper

5. I further support the Alternative B recommendation to not provide firewood or other vegetative products for public use. While I favor cutting the tamarisk tree which is not native to AZ, I am not in favor of cutting mesquites for firewood. I believe the mesquites are important habitat for AZ wildlife species and should not be sacrificed for firewood.

68-1 6. I am concerned that both Alternative A and B designate over 800,000 acres to Visual Resource Management Class I. Although I do not understand the complete meaning of I would interpret "major modification of the existing character of the landscape" to include total destruction by mining. I believe over 800,000 acres designated for that classification is far too great.

7. Lastly, I would like to take this opportunity to comment on my feelings about livestock grazing on our public lands. Although I know this is a sensitive issue, I personally believe the 2% of beef provided nationwide by grazing on the BLM lands in eleven western states is a terrible tragedy to public lands. Destruction to BLM land by overgrazing, water competition between wildlife and cattle, soil erosion, wildlife destruction by the ADC and ranchers themselves, and loss of plant and animal habitat are all unjustifiable to my mind. I would support any means of lessening and finally eliminating cattle grazing on public lands. This may include everything from buying out ranchers directly, subsidizing them to have fewer cattle, or job retraining programs. I do not mean to oversimplify the problem, but I do believe there are ways of working the problem without continuing the status quo of destroying our public lands.

Thank you for the opportunity to voice my opinion about the use and management of our public lands.

Sincerely yours,

Mary C. Schanz
Benjamin M. Watkins

Mary C. Schanz
Benjamin M. Watkins
301 W. Spring Valley Pl
Tucson, AZ 85737

Recycled Paper

69

Safford District Grazing Advisory Board

R e s o l u t i o n
1990-01

WHEREAS, the economic survival of each rural community and county in each state depends on private property as a tax base; and,

WHEREAS, further taxes for rural counties and communities are derived from persona property tax on livestock; and,

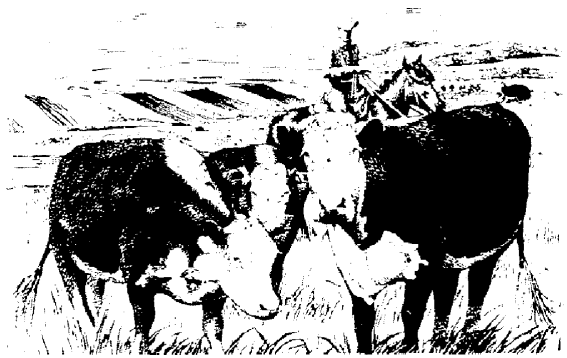
WHEREAS, the current Bureau of Land Management Resource management Plan Draft (preferred alternative) proposes to withdraw 22,883 acres from any possibility of future use by livestock grazing impairing and reducing the tax base of Graham and Cochise Counties;

THEREFORE, BE IT RESOLVED the Safford District Grazing Advisory Board is opposed to any withdrawal of lands in our two counties that would affect the tax base.

Adopted this 30th day of March, 1990

SAFFORD DISTRICT GRAZING ADVISORY BOARD

Allen Day, Chairman



70

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

GOVERNOR
RANDOLPH WOOD, DIRECTOR

March 30, 1990

Mr. Steve Knox, RMP Team Leader
Safford District office
Bureau Management
425 East 4th Street
Safford, Arizona 85546

Knox:

This letter is in response to your January 1990 request for a" air quality impact review, of the following project:

Safford District RMP/EIS

The planned project is partially located in a" air quality attainment area, that is, an area which currently meets federal health standards for air pollution levels. The Paul Spur Area in in nonattainment for PM_{10} (particulate matter less than 10 microns).

We have reviewed the submitted proposal and no adverse air quality impact is anticipated as a result of the project. However, during construction, we would request that steps are taken to minimize the amount of particulate matter (dust) generated, including incidental emissions caused by strong winds, as well as tracking of dirt off the construction site by machinery and trucks. Applicable state rules are contained in A.A.C. R18-2-404.

I" addition, please be aware that portable sources of air pollution such as rock, sand, gravel, and asphaltic concrete plants are required to receive Installation and Operating permits from the Office of Air Quality in order to operate in the State.

Thank you for the opportunity to comment. Should you have any further questions, please contact this office at 257-6965.

Sincerely,

Joe Gibbs
Office of Air Quality

JG/sds

Enclosure

The Department of Environmental Quality is An Equal Opportunity Affirmative Action Employer.

Central Palm Plaza Building 2005 North Central Avenue Phoenix, Arizona 85004

and development concerning the effects of forest burn programs on air quality. Such report shall include, where applicable, innovations in the management of prescribed burning using meteorological data, as well as special burning methods, or innovative equipment. Alternatives to burning shall also be considered. Research as to cost effectiveness of the various methods should also be included.

Historical Note

Former Section R9-3-403 repealed, new Section R9-3-403 adopted eff. May 14, 1979 (Supp. 79-1). Former Section R9-3-403 renumbered without change as Section R18-2-403 (Supp. 87-3).

R18-2-404. Open areas, dry washes or riverbeds

A. No person shall cause, suffer, allow, or permit a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, without taking reasonable precautions to limit excessive amounts of particulate matter from becoming airborne. Dust and other types of air contaminants shall be kept to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means.

B. No person shall cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne. Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means.

C. No person shall operate a motor vehicle for recreational purposes in a dry wash, riverbed or open area in such a way as to cause or contribute to visible dust emissions which thea cross property lines into a residential, recreational, institutional educational, retail sales, hotel or business premises. For purposes of this Subsection "motor vehicles" shall include, but not be limited to trucks, cars, cycles, bikes, buggies and three-wheelers. Any person who violates the provisions of this Subsection shall be subject to prosecution under A.R.S. § 36-1720.

Historical Note

Former Section R9-3-404 repealed, new Section R9-3-404 adopted eff. May 14, 1979 (Supp. 79-1). Amended by adding Subsection C. eff. Sept. 22, 1983 (Supp. 83-5). Former Section R9-3-404 renumbered without change as Section R18-2-404 (Supp. 87-3).

R18-2-405. Roadways and streets

A. No person shall cause, suffer, allow or permit the use, repair, construction or reconstruction of a roadway or alley without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Dust and other particulates shall be kept to a minimum by employing temporary paving, dust suppressants, wetting down detouring or by other reasonable means.

B. No person shall cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions, such as wetting, applying dust suppressants, or covering the load, to prevent particulate matter from becoming airborne. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

Historical Note

Former R9-3-405. Other industries, renumbered R9-3-406, new Section adopted eff. Sept. 17, 1975 (Supp. 75-3). Former Section R9-3-405 repealed, new Section R9-3-405 adopted eff. May 14, 1979 (Supp. 79-1). Amended eff. Oct. 2, 1979 (Supp. 79-5). Former Section R9-3-405 renumbered without change as Section R18-2-405 (Supp. 87-3).

R18-2-406. Material handling

No person shall cause, suffer, allow or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Former Section R9-3-405, renumbered eff. Sept. 17, 1975 (Supp. 75-1). Former Section R9-3-406 repealed, new Section R9-3-406 adopted eff. May 14, 1979 (Supp. 79-1). Former Section R9-3-406 renumbered without change as Section R18-2-406 (Supp. 87-3).

R18-2-407. Storage piles

A. No person shall cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled, or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.

B. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Adopted eff. May 14, 1979 (Supp. 79-1). Former Section R9-3-407 renumbered without change as Section R18-2-407 (Supp. 87-3).

71

3-29-90

Dear Folks,

It just came to my attention that the Safford range management plan calls for the rebuilding of the Aravaipa Canyon road.

In the vernacular of the day "get real, get a job". Certainly there is no need except for wilderness destruction. This area obviously needs the protection of closed ways, "Don't you have a wilderness area to manage", not create unregulated use to the canyon edge. ? yes!!

Better put (you) somewhere else. Why not hire some bear protectors, mountain lion guardians, and ORV road builder traffic cops. The wilderness needs more protection, not more roads.

I remain one willing to enjoy the wilderness resource without needing improved recreational access everywhere.

Sincerely,

Rudi Lambrechtse 4352 N. Baker #A Kingman, AZ 86401

72

Phone # 602/625-9063

HARRY JANIS, JUNE JANIS
1424 CAMINO DE LA OCA
GREEN VALLEY, AZ 85614

March 30, 1990

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, AZ 85546

Knox:

Ye have received a copy of the Draft RMP for the Safford District. We must admit to only a very brief review of the alternatives listed and their varying impacts.

Despite this brief review. come for Alternative B, the alternative which would supply greater protection to riparian, paleontological and other resources. We have worked for environmental protection for many years - mainly in the State of Michigan. We know the irreversible damage which can be done to fragile environments by improper use (misuse) by man.

Since any use, permitted or otherwise, will effect the area under consideration, we encourage the establishment of the strictest controls possible of the areas under your jurisdiction. There is so little damage which we can control, where control is possible it should be applied and monitored with great stringency.

Sincerely,

June Janis

Harry Janis

73

March 30, 1990

Dear Mr. Knox,

We support Alternative Plan B for the following reasons:

1. Restriction of cattle grazing in critical areas. Cattle grazing often destroys food for the wildlife.
2. We need to protect archaeological sites. These sites are important to the history of the region.
3. Restrict off road vehicles in the area. These vehicles are dangerous to wildlife & persons riding the vehicles.
4. Bighorn sheep lambing areas. Wild animals do not appreciate other animals or humans during these critical times.
5. Improves the habitat for wildlife by providing management of over 100,000 acres.
6. Provides protection for 4,000 acres of riparian vegetation.

Therefore, Mr. Knox we hope Plan B is the plan which is best for the animals & people using the areas for recreation. We urge you to consider the help & advice from the Nature Conservancy.

Minnie Shafer

226 D La Canada
Green Valley, Az. 85614

74

JOHN R. SWANSON
3400 Edmund Blvd.
Minneapolis, MN 55406

March 30, 1990

Bureau of Land Management
425 E 4th Street
Safford, Arizona 85546

Dear Sirs:

Please accept my following comments concerning the ~~Bureau Management Plan Environmental Impact Statement Safford District~~

I am acquainted with the Safford District Bureau of Land Management, and continue to agree that the public lands in this District contain outstanding wilderness, wildlife, biological, cultural and scientific resources, and an National Heritage resource.

As these lands, future images, varied and fragile natural attributes that fully justify Management, I would like to state that I oppose the Preferred alternative, as it will destroy a variety of natural features, including wilderness and wildlife - biological resources, as well as other natural and cultural resources.

Further, the Bureau of Land Management areas in this District must be properly managed so that they may not destroy Man, and all Life, on this endangered planet.

And to do so by designating the Safford District, Bureau of Land Management, Public Lands, as a National Natural Preserve, with no surface - subsurface activities - developments.

To select the following areas and areas as listed on the Bureau of Land Management areas, Safford District, as designated Wilderness and included in our National Wilderness Preservation System, as each area contains impressive wilderness attributes:

4-1

Aravaipa Canyon	Wilderness additions, only 22,000
Dutchman	23,000
Redfield Canyon	12,000
Black Rock	10,000
Fish Creek	18,000
Dry Mountain	22,000
Dry Creek	23,000
Santa Teresa Mountains	21,000
Devil Dive Peak	22,000
Galiuro Mountains	19,000
Galiuro Mountains	23,000
Beaver Mountain	7,000
Bakers Canyon	5,000
Aravaipa Canyon	1,000
Aravaipa Canyon	3,000

And to secure additional Wilderness areas - areas so as to function as Wilderness complex representing Bureau of Land Management areas, Safford District, to include (at least) 910,000 acres, National Wilderness Preservation System.

To classify the District as a National Critical Wildlife - Biological Habitat Area, so as to assure that all wildlife - biological resources may survive and flourish, and to preserve the Mountain Lion as a fully protected mammal, with the Desert Southwest as a biological complete protection, creature and habitat.

To include rivers - creeks in our National Wild and Scenic Rivers System.

To select a complete - maximum - complex of areas of Critical Environmental Concern and Recreation areas.

To not engage in ability sports, and to remove Animals Zoos to Nature areas.

To not allow off-road vehicles as their use destroys air and water.

To eliminate Grazing so as to save air and protect resources, as it has to be grazing is very destructive.

With the removal extraction so as to save land and water - resources.

And to reclaim all Buildings, along with the Lambs Dis-track.

Also, to develop a Wildlife Reintroduction Plan - Program with New Mexico and the Republic of Mexico.

Sincerely,

John R. Swanson

75

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

March 28, 1990

Re: Eagle Creek Bat Cave as proposed ACEC in BLM's Safford District Resource Management Plan

Dear Mr. Knox,

This letter is to comment on the Eagle Creek Bat Cave portion of the Safford District's proposed land management plan. I would like to see Alternative A accepted as the management strategy for this area due to the significance of the Mexican free-tailed bat population a* a maternity colony. As monies become available the lands in Alternative B should be acquired. The necessity for a management plan for protection of the bats is essential.

- There are very few major Mexican free-tailed maternity colonies in the United States. This maternity roost represents a significant percentage of the overall population.
- Regular human disturbance, especially in Alternative C would have an adverse impact on the colony. Thousands would die before a census could determine the decline.
- With such a large number of helpless young being raised in a single location during a specific time frame each year, the possibility of a catastrophic incident from careless or malicious humans is possible.
- As already stated in the management proposal, the Mexican free-tailed population has been in steady decline for several years across its entire range.

I have been to Eagle Creek Bat Cave three times, all on research oriented trips when the bats were not present to work on low impact population estimate*. During the most recent visit, January 27th. 1990 we observed the 'classic' scenario of three men riding up on ATV's, walking up the hill with their M-16, walking through the gate past the old "Do Not Disturb The Guano" sign and up onto the guano mountain. I went up and requested them to come back down. We had a polite conversation and they followed me down the slope. Later, farther up the canyon, we heard them target practicing with some 30 rounds in rapid succession. If this scenario occurred during the summer months it is quite possible the target practice would have been at the cave.

Please begin with the protection this sight with your Alternative B, the ACEC designation including the 3160 acres. If Alternative B is not achievable due to monitory restraints for the land acquisition then Alternative A should be taken. I would not like to see Alternative C taken. The chances of changing the micro-climatology through mining the guano inside the cave and thus effecting the bats is too great. I have shown an example of Alternative D above. Similar instances contribute to the current population decline.

Sincerely,

Raymond Keeler

Raymond Keeler
President, Arizona Region of the
National Speleological Society

76

United States Department of the Interior

FISH AND

National Museum of Natural History
Washington, D.C. 20560
(202) 357-1930

March 28, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Hr. Knox:

I was heartened to learn that BLM is contemplating protecting Eagle Creek Cave and the dwindling population of Tadarida brasiliensis that roost there. n response to the agency request for public input on the 1989 Resource Management Plan Draft Environmental Impact Statement, I would like to support efforts to protect Eagle Creek Cave as a" Area of Critical Environmental Concern.

During the 1970s, I studied declining populations of T. brasiliensis throughout the Southwestern U.S., including the population at Eagle Creek Cave (see enclosed reprints). At that time it was obvious that the Eagle Creek colony had already undergone a perilous decline. Our studies showed little support for the theory that the decline there was due to pesticides as we had demonstrated for the population at Carlsbad Caverns. Although there is some evidence of heavy metal contamination, there was also considerable evidence of continuing vandalism being a major contributor to the decline.

We routinely found empty shotgun shells and other evidence of human disturbance during our visits to the cave. I would really prefer your Alternative B, to protect the entire expanse of Eagle Creek. I think that would make it much easier to control access to the cave, and would provide significant protection for other important natural resources as outlined in the ACEC evaluation.

76-1 Regardless of the alternative ultimately selected, I hope you will consider posting a conservation message explaining why the public should be excluded from the cave, so that legitimate visitors to the Canyon will not be offended. The public could easily be accommodated to view the exit flight from below, providing an educational opportunity as well. In conjunction with this, I would urge a ban on the discharge of firearms within a quarter mile or so of the cave entrance.

76-2 If access to the area cannot be controlled effectively, it might be necessary to build a better gate across the entrance. The entrance is high enough that a" effective bar to human entry could be designed that occupied only the bottom 10 feet or so, leaving the bats ample room to exit normally through the higher part of the entrance. Should you eventually contemplate changes to the gate, I would recommend consulting the U.S. Fish and Wildlife Service Bat Recovery Team or Bat Conservation International for current guidelines on cave gating.

Thank you for your efforts on behalf of our natural resources. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Don E. Wilson
Research Zoologist

77

Denali (Mt. McKinley) National Park, Alaska.
Photo ©Carr Clifton

FROM: BONNIE POULOS
1208 E. SMOOT DR
TUCSON, AZ 85719

31 MARCH, 1990

TUCSON, AZ 85719 PM 1 APR 1990

RE: RMP FOR SE ARIZONA
ALTERNATIVE B

I WISH TO COMMENT ON THE PROPOSALS FOR FUTURE USE OF BLM PUBLIC LANDS IN S.E. ARIZONA. MUCH OF MY FREE TIME IS SPENT OUT IN ARIZONA WILDERNESS AND PUBLIC LANDS. I HIKE MORE THAN 300 MILES A YEAR AND MOST OF THOSE MILES ARE IN S. ARIZONA.

SOME BLM LAND SUCH AS ARAVAIPA CANYON ARE INCREDIBLE RESOURCES OF NATIVE VEGETATION, WILDLIFE AND GEOLOGY. SOME BLM LAND SUCH AS EMPIRE RANCH USES WELL-BALANCED GRAZING TECHNIQUES AND SUCCESSFULLY COMBINES COMMERCIAL USE WITH PRESERVATION OF THE NATURAL ENVIRONMENT. DUE TO LACK OF STAFFING, HOWEVER, ELGARE RANCH ALSO SUFFERS FROM ILLEGAL OFF-ROAD VEHICLE USE WHICH I HAVE PERSONALLY OBSERVED. THEN THERE IS SOME BLM LAND IN S. ARIZONA SUCH AS THE DARBY WELLS RUN AREA NEAR AJO THAT IS FULL OF TRASH, SPENT RIFLE SHELLS, VEHICLE TRACKS AND DEVASTATED WASH AREAS.

I THINK THE BLM SHOULD PUSH FOR BETTER STAFFING AND A HIGHER BUDGET IN ORDER TO PRESERVE MORE OF OUR PUBLIC LANDS. OUR PARKS AND NATURAL AREAS ARE JAM-PACKED FALL, WINTER AND SPRING WITH TOURISTS WANTING TO BE OUT OF DOORS. WE NEED MORE AREAS WHERE PEOPLE CAN FIND PEACE AND QUIET AND A NATIVE DESERT ENVIRONMENT AND WHERE PEOPLE CAN WALK OR RIDE THEIR HORSES.

I HOPE THE BLM WILL WORK FOR BETTER LAND STEWARDSHIP AND EMPLOY MORE PEOPLE TO CARE FOR AND MAINTAIN OUR NATURAL AREAS, DE-EMPHASIZING COMMERCIAL USE AND THE USE OF MOTORIZED VEHICLES WHICH LEAVE INDELIBLE SCARS ON THE DESERT.

THANK YOU. Bonnie J. Poulos

TO: STEVE KNOX
RMP TEAM LEADER
BUREAU OF LAND MANAGEMENT
425 E. 4TH ST.
SAFFORD, AZ 85546

78

Please [illegible]
of off highway vehicles
areas. I am in favor
Aravaipa and Muleste
Thank y
C

79

1149 Mountain View
Green Valley, Az.

Dear Mr. Ruex,

Having studied Safford District Resource management Plan etc. draft, We urge very strongly the ~~Alternative B plan~~. This alternative we believe recognizes the terrible damage that results from unrestricted off highway vehicles in desert areas. Our experience has been that partial restriction does not work unless you have a tremendous policing force which we neither have nor want. Closing lands to this use is the same answer. Give them specific places to play and save our irreversable lands.

We know from past history and see many examples today of the damage done the land by averagaging Alternative B speaks to this problem too, as well as the best protection for wonderful places like Arivaipa Canyon & Mesquite.

It was heartening to [illegible] that there was the prospect of even closer coordination between the B.L.M. and the Nature Conservancy. It seems that nothing but good can result from this combining of aims and know-how of two groups really working for the same purpose.

Sincerely,

Louise S. Uhl
and
John H. Uhl

1149 Mountain View
Green Valley
Az.

80

RE: Safford RMP

3/30/90

Gentlemen;

please do not re-open the Virgus Canyon road, and please do not open or build any more roads in the Arivaipa Canyon or Galiuro Mountains areas. Thank you for your time.

Daniel R. Mayercek
2316 N. Chrysler
Tucson, AZ 85716

81

PETITION

TO: Bureau of Land Management
U.S. Department of the Interior
425 E. 4th Street
Safford, A2 85546

RE: Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS)

THIS PETITION is in regard to the use of the high country above Aravaipa Canyon. We request that you do not open the mad across Virgus Canyon. The area west of Virgus should be open to equestrian and foot travel only. At present. there are many O-wheel drive roads in the Turkey Creek-Table Mountain area. There is a need for equestrian trails outside of the Aravaipa Creek itself and horses and ORVs are a dangerous combination.

NAME	ADDRESS		DATE
[illegible]	6571 N. Columbus	Tucson, AR 12 85718	3/21/90
[illegible]	2019 E. Silver	Tucson AL 85719	3/21/90
[illegible]	3572 E. River	Tucson, Az 85718	3/21/90
[illegible]	7812 N. La Canada (former address the [illegible])	Tucson Az	3/21/90
Cheri Chance	11431 E. Summerhill	Tucson Az. 85749	3/22/90
[illegible]	5701 E. Glenn #88	Tucson Az. 85712	3/22/90
[illegible]	1852 W. Record St	Tucson, Az 85705	3-22-90
Lynette Sebundy	6481 Avenida de Ponda	Tucson, Az 85718	3-23-90
Marian Matters	5661 E Kelso	Tucson Az 85712	
Ira Smith	1620 N Wilmot #E155	Tucson Az 85712	3-23-90
Felipe Collins	PO Box 1105	Oracle Az 85623	3-23-90
[illegible]	3572 E River	Tucson 85718	3-23-90
[illegible]	3572 E. RIVER	TUCSON 85718	3-23-90
Pat M. Celentano	3952 N. Sutton Ln	Tucson 85718	2-23-90
Margaret E. [illegible]	" "	" "	3-27-90
[illegible]	3631 E. Roger Rd	Tucson 85718	3-27-90
Richard [illegible]	3631 E Roger Rd	Tucson 85718	3/27/90
M. Villadi	5042 E Camino Alisa	T.A. 85718	3-27-90
Michelle Vizzos	3119 N. Palo Verde	Tucson Az 85716	3-27-90
[illegible]	1421 E Greenlee 85719	Tucson Az	3/27/90
[illegible] Miller	5212 E Camino [illegible]	Tucson, Az 85718	2/28/90

82

Dos Cabezas Route, Box 6309
Willcox, Az. 85643

March 29, 1990

MI. Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, Az. 85546

Re: Draft Safford District Resource Management Plan & Environmental Impact Statement

Dear Steve:

The document under review, with appropriate maps, provides a wealth of information in which to make a reasonably good judgement of the four alternative land use plans. The BLM has Properly identified four major issues and ten concerns to which most of the public recognizes.

Although the BLM prefered Alternative A provides for a basis to land use and management problems, I would strongly like to emphasize that Alternate B enables much more protection to the natural resources and the environment. I, therefore, recommend and support Alternate B.

The mild interests on the part of the public towards the Public Lands and the environment during the past have dramatically shifted in recent years to major concerns. Many realize that this is all that is left of the Public Lands and that they should be used and/or protected wisely. It is also becoming more apparent that the values of the natural and cultural resources as they are found or occur are of great interest and importance.

The BUM should be especially commended on the identification of several sensitive areas such as the ACEC, NCR, NRHP, ONA and RNA units. The enlargement of most of these critical areas as proposed in Alternate B would afford a greater buffer thus providing much more protection to these units.

I would also encourage the Peloncillo Mountains as a wilderness addition. The Scenic ACEC around Fort Bowie could also be transfered to the Nation1 Park System so as to enable this National Historic Site to be a larger and more complete Unit. I would strongly support the Gila Box as a Riparian National Conservation Area. Other wilderness areas mentioned are also encourged.

I stongly oppose the possible suggestion of vegetation manipulation in the future through the use of artificial methods such as chemical biocides on Public Lands. Similar control methods on insects would also be objectionable.

Sincerely,

Dan Fischer

Dan Fischer

83

March 29, 1990

Mr. Steve Knox
Bureau of Land Management
425 E. 4th St.
85546

The does not adequately address wolf reintroduction needs.

Al Bammann, who of the RMP's wildlife discussions, stated on March 24 to me that wolf reintroduction was not discussed because no agency has designated any reintroduction areas.

Addressing wolf reintroduction in the RMP should not be contingent upon designation of a reintroduction site. What are the impacts on wolf reintroduction if the RMP ignores the issue? Doesn't the BLM have a statutory obligation to consider the issue absent a specific proposal?

83-1 that he was unaware that in 1986, AGFD identified Safford District BLM lands for evaluation as wolf reintroduction sires. A copy of this document is attached. The EIS should include of the impacts of BLM's habitat management adjustments upon the suitability of these areas for wolf reintroduction.

Yours,

Julia Swanson

Julia Swanson
Arizona Earth First!

FILE COPY EMF

BRUCE BABBITT, Governor

COMMISSIONERS
W. LINN MONTGOMERY, Flagstaff, Chairman
FRED S. BAKER, Elgin
LARRY D. ADAMS, Bullhead City
FRANCES W. WERNER, Tucson
THOMAS G. WOODS, JR., Phoenix

Director
BUD BRISTOW

Assistant Director, Services
ROGER J. GRUENEWALD

Assistant Director, Operations
DUANE L. SHROUFE

ARIZONA GAME & FISH DEPARTMENT
2222 West Greenway Road Phoenix, Arizona 85023 942-3000

July 28, 1986

Michael J. Spear, Regional Director
U.S. Fish and Wildlife Service
Post Office Box 1306
Albuquerque, New Mexico 87103

Dear Mr. spear:

This letter is in response to your request of July 14 for a list of areas in Arizona that could possibly sustain reintroductions of the Mexican wolf (Canis lupus baileyi).

The enclosed list is not prioritized and the area boundaries are not defined. The areas listed are based largely on the habitat recommendations and considerations established by the Mexican Wolf Recovery Team and enclosed with your letter of July 14. We view this initial list as a basis to begin the process of delineating potential. reintroductions sites, and agree that many non-biological factors will guide the more rigorous site prioritization process and influence the final selection of release areas. The habitat considerations developed by the Recovery Team are adequate for commencing the reintroduction effort, and at this time we offer no considerations in addition to those.

I" considering candidate reintroduction areas it is difficult to separate the biological from the non-biological components. For example, the nearly statewide presence Of livestock will inevitably result in livestock-wolf conflicts. Even if releases are made in areas "here livestock are excluded, the wide-ranging nature of wolves will eventually bring them in contact with livestock far from the release area. However, we focused more on biological factors of relating to habitat expanse and condition and native prey populations. We think that some mechanism to handle livestock depredation must be outlined very soon, and refined later with local ranchers as specific release areas are selected.

We suggest that there be a series of meetings to specifically define and prioritize potential release areas. The initial meeting could be with the Recovery Team and responsible state and federal agencies, but soon afterward we should provide ample opportunity for public Involvement.

An Equal Opportunity Agency

Ye are looking forward to developing with the U.S. Fish and Wildlife Service a wolf reintroduction program that successfully fills a predator niche vacated by decades of persecution. At the same time we hope this project succeeds in revealing to the people of Arizona the true nature and tragic history of the wolf in our state. Indeed, both of these expectations must be met if we are to maintain this important element of southwestern fauna.

Please contact Rich Glinski, Nongame Biologist, or Terry Johnson, Endangered Species Coordinator, if you need additional assistance.

Sincerely,

Bud Bristow
Director

BB:RLG:rp
Enc.

cc: Lee Perry, AGFD
Mike Yeager, AGFD
Tom Britt, AGFD
Wes Martin, AGFD
Tom Spalding, AGFD
Don Turner, AGFD

84

3-31-90

DEAR BLM,

AS A MEMBER OF THE WHITE MOUNTAIN CONSERVATION LEAGUE, I AM AGAINST YOUR PLANS TO REBUILD THE VIRGUS CANYON ROAD.

PLEASE CONSIDER THIS LETTER WHEN MAKING YOUR DECISION.

THANK YOU-

TOM HOLLENDER
PO 72
NUTRIOSO, AZ 85932

85

March 17. 1990

Steven Term Leader
Bureau 01 Land Management
42s E. 4th street
Safford, AZ 85546

Dear Mr Knox,

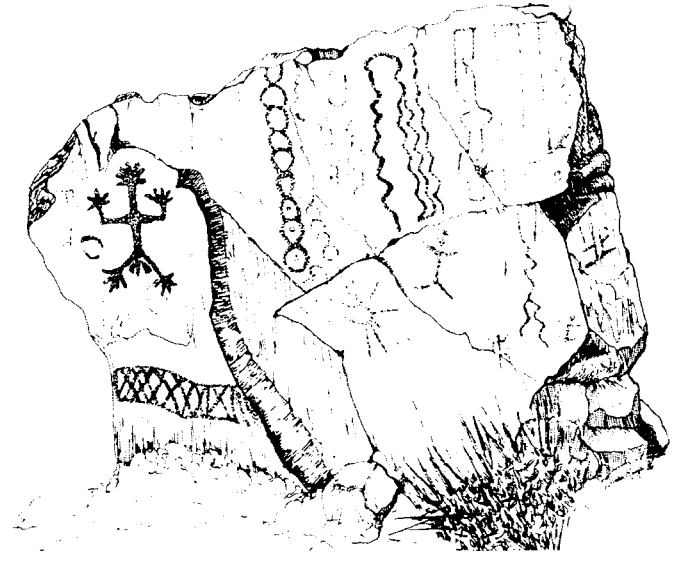
I to support Alternative B for the Plan.
I think it will be the to protect and Muleshoe areas because it protects archaeological sites and wildlife habitat.

I selected Arizona for my retirement years because of its natural beauty and I urge the BLM to help preserve the my grandchildren to enjoy.

Sincerely,

Erwin Siwek

Erwin Siwek



86

Science West
University of Arizona
Tucson, Arizona 85721

31 March 1990

Mr.
RMP Team Leader
Bureau of Land Management
425 E 4th Street
Safford, Arizona 85546

Dear Mr. Knox:

In another letter I have written my general comments about the BLM Safford District Resource Management Plan and draft Environmental Impact Statement (Dec 1989) and about a few of ACEC's. I have visited several of the areas that are being reviewed, but the area I am most familiar is Eagle Creek Bat Cave. I wanted to address it separately in this letter.

The significance of this cave cannot be overstated. Prior to 1966, estimates of peak numbers of Mexican Free-tailed Bats (*Tadarida brasiliensis mexicana*) occupying the cave during spring and summer ranged between 1 million (Constantine, 1958) and 100 million (Reidinger and Cockrum, 1978). After 1966, the oft-quoted opinion of population size during the 1960's has been given as 25 million bats (Cockrum, 1970; review in Sidner, 1986). More recently, estimating techniques based on guano accumulation and cave dimensions suggest that the population could have been as high as 6 million (McFarlane and Keeler, in review). Estimates of decreased numbers of bats are just as variable with one point in common: they all show a drastic reduction from the peak estimate, to say the least.

This cave once held the highest [redacted]ion of mammals (and perhaps any vertebrates) in our state. That is a resource of considerable value, especially when the benefits of bats are considered, and when their roles within the broader ecosystem are defined. This species of bat is a major predator of night flying insects including those that are considered to be economically harmful to agriculture. These bats are food for avifauna (including threatened and endangered species) in Eagle Creek and many other areas. For example, they have been observed to be captured by buteos and falcons in flight (Sidner, 1986), by peregrine falcons in flight and by turkey vultures inside the cave (Sidner, 1987; field notes), and by spotted owls in other areas in the state (review in Duncan and Sidner, in press). Their role as food items for many terrestrial vertebrates has been given in numerous references. Their guano and carcasses offer a critical refuge to a host of native invertebrates. They cause changes in microclimate within their roosts which undoubtedly aids other species of bats they cc-occur.

Like most other species of bats, Mexican freetails have an extremely low reproductive potential. They are not capable of recovering population losses rapidly. Natural mortality by catastrophic climatic events or insect cycling then can cause drastic decreases in their numbers. Evolutionarily they deal with these events. But the disturbances caused by human impact, those of habitat loss, pesticide introduction, scientific collecting, and disturbance at the maternity site, offer little hope of recovery. These bats must be protected.

86-1

I strongly favor Alternative B. My recommendations to this end are based upon evidence of disturbance by encroachment upon the cave. Much of this pitiful and illegal activity is undoubtedly due to ignorance. For this reason I **strongly recommend that educational [redacted] messages be placed in the canyon near the cave** for the public, imitation to enjoy the bat flight from the canyon bottom. And because such messages will never be understood by everyone who visits the area, I **more strongly recommend erecting a bat-protection gate** at the entrance. The existing fence will only keep who have already acquiesced to the posted conservation message. **Withdrawal of the cave from mining activities is a necessity** because every human visitation to the interior causes the loss of bats (either by those that abandon or by the loss of baby bats that drop to a guaranteed death). It is also probable that the removal of guano changes the microclimate enough to effect differences in bat behavior. In addition, because I have seen shells of shotguns and various caliber rifles at the entrance to the cave on every visit, I recommend a **restriction on the discharge of firearms in the vicinity of the cave.**

Alternative B would eventually lead to the joining of this section of Eagle Creek to the proposed Gila Box Riparian National Area. This would help to gain public awareness and appreciation for the bats, as well as demonstrating the effectiveness of the BLM in protecting public lands.

I am very pleased that the BLM has again noticed and singled out Eagle Creek Bat Cave for this renew, and I hope that you will do all that is possible to protect the site and its bats.

Sincerely,

Ronnie Sidner

Ronnie Sidner

References Cited:

Cockrum, E. L 1970. Insecticides and guano bats. Ecology, 51:761-762.
Constantine, D. G. 1958 Bleaching of hair pigments in bats by the atmosphere in caves. J. Mammalogy, 39:513-520
Duncan, R. B. and R. Sidner. In press. Bats in spotted owl pellets in southern Arizona. Great Basin Naturalist.
McFarlane, D. A and R C Keeler. In review. A proxy population record for the Mexican Free-tailed bat (*Tadarida brasiliensis*) at Eagle Creek Cave. Arizona.
Reidinger, R. F. and E. L Cockrum. residues in free-tailed bats (*Tadarida brasiliensis*) at Eagle Creek County, Arizona. pp. 85-96 in International Bat Research Conf. Olembo R J., J. B. Caselino, and R. A Mutere, eds. Kenya Literature Bureau, Nairobi. 328 pp.
Sidner, R. 19%. The significance of Eagle Creek Cave to Arizona's Mexican Free-tailed bats, *Tadarida brasiliensis mexicana*. Report to the Arizona Game and Fish Department, June 1986. 65 pp.

Potential Wolf Reintroduction Areas
compiled by
Arizona Game and Fish Department
July, 1986

Map #	Area Name	County	Principal Ownership
1	Blue Primitive Area	Greenlee	"SFS (Apache-Sitgreaves)
2	Gila Mountains	Graham	BLM, state (near San Carlos Indian Reservation)
3	North Kaibab-Saddle Mountain Wilderness	Coconino	USFS (Kaibab)
4	Redrock-Secret Mtn-Sycamore Wilderness Complex	Yavapai & Coconino	USPS (Coconino and Kaibab)
5	Coconino Plateau	Coconi" o	State and private
6	Aquarius-Mohon Mountains	Mohave & Yavapai	state, private, BLM
7	sierra Ancha Mtns.	Gila	USFS (Tonto)
8	Mazatzal Mountains	Gila	USFS (Tonto)
9	Hardscrabble/Polles Mesa	Gila	USFS (Tonto)
10	Timber Camp	Gila	"SFS (Tonto)
11	Pine Mountain	Yavapai	"SFS (Prescott)
12	Galiuro Mountains-Sulphur Springs Valley	Graham	"SFS (Coronado), BLM, private
13	Chiricahua Hountains-Peloncillo Hountains-San Bernardino Valley	Cochise	USFS (Coronado), BLM, private
14	Atascosa Mountains	Santa Cruz	"SFS (Coronado)
15	Huachuca Mountains-%" Rafael Valley	Santa Cruz-Cochise	"SFS (Coronado), private

87

Dear Mr. Knox:

After review of the Safford District RMP+EIS Draft, I have concluded that I am in favor of the Alternative "B".

I feel that this Alternative best suits the needs of my concern for the environment of this unique area.

We are very fortunate to have such a varied and unique landscape such as these areas in this plan, I would hope that by choosing Alternative "B" we can help protect these areas for many generations to come.

Thank you for allowing me to voice my sentiments on this issue

Sincerely,
John [illegible]

88

United States Department of Agriculture

Animal and Plant Health Inspection Service

Science and Technology

Denver Wildlife Research Center
Building 16, P.O. Box 25266
Denver Federal Center
Denver, CO 80225-0266

April 2, 1990

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ a5546

Dear Mr. Knox:

I strongly recommend the Eagle Creek Bat Cave be designated an Area of Critical Environmental Concern. Preferably it should b-e preserved as a 40-acre parcel under the management prescription as a Preferred Alternative.

Eagle Creek Cave is one of three known maturnity caves for the Mexican free-tailed bat (Tadarida brasiliensis). In the 1960's, I visited Eagle Creek Cave while a student at the University of Arizona. The 7 million bats in this ❑ aturnity cave not only were a zoologist's dream, but also had a tremendous impact on Arizona agriculture by consuming millions of insects nightly.

To learn this population has dwindled to an estimated 40,000 is alarming. I do not place the blame for this decline entirely on human encroachment. In fact, the mismanagement of pesticides in Mexico probably has had the greatest impact on this migratory species. But. I also feel we should protect this cave to ensure this population will continue to survive.

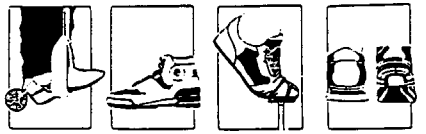
Sincerely,

G. Clay Mitchell

G. Clay Mitchell, Ph.D.
Wildlife Biologist

APHIS—Protecting American Agriculture

89



PIMA TRAILS ASSOCIATION
5660 Paseo de la Tirada
Tucson, Arizona 85715
(602) 577-2095

March 31, 1990

A. Brady
District Manager
Bureau of Land Management
Safford District Office
425 E. 4th street
Safford, AZ 85546

Dear Mr. Brady:

Enclosed is my Safford District RMP public comment form, which I completed after consulting with off-road bicyclists in my organization and around southern Arizona. As you can ascertain from the nature of my comments, mountain bicycle enthusiasts are less than thrilled with how the proposed RMP will treat them--particularly the decision to unfairly penalize mountain bikes by lumping them in with ORV's. Insamuch as we feel that mountain bicycles, with their proven minimal environmental impact, don't belong in the ORV category. we suggest the creation of a separate mountain bicycle classification to allow the fair consideration of mountain biking issues. 89-1

Please feel free to call on me if the Safford District is ever in need of assistance in dealing with mountain biking issues. I'm especially interested in working with the BLM to establish specially-designated mountain bike trails.

Thank you very much.

Sincerely,

Steve Anderson

Steve Anderson
Pima Trails Association Board Member Representing Off-Road Cyclists.

Draft Safford District Resource Management Plan

Public Comment Form

Issue/Management Concern: Mountain Bike Access

Comment: As the Pima Trails Association board member charged with representing the interests of off-road bicyclists, I feel compelled to comment on the rather unfair manner in which the issue of mountain bicycle access is treated in the Safford District Draft Resource Management Plan/E.I.S.

The most significant access-related concern enthusiasts have raised relates to the Safford Distrct staff's unfortunate decision to include mountain bicycles in the access-restrictive "Off-highway Vehicle" (OHV) category along with such motorized conveyances as as motorcycles, ATV's, and 4-wheel drive trucks. Obviously, the need for an "OHV" classification exists to facilitate the careful consideration of where potentially destructive motorized vehicles should be allowed to be used on public lands; however, mountain bicycles hardly belong in this group. A variety of trail-damage studies conducted in recent years, including the well-known 1987 Kepner-Trego Analysis, have concluded that off-road bicycles pose no more of an environmental "threat" than do hikers or equestrians. Given that such scholarly examination has shown that mountain bikes have a minimal impact at most, it is patently unfair to subject mountain bikers to the restricted access status that is part of being classified as an "OHV." The time has come to dispense with the myths about the "dangers" of mountain biking proffered by ill-informed, intentionally deceptive environmental interests and a selfish minority of other trail users and allow mountain bikers the fair access they deserve--access which should include the ability to recreate on all lands open to hikers and horsemen except for designated wilderness and wilderness study areas.

Another major access-issue concern for mountain bikers is the Safford District staff's belief, expressed in the Draft RMP and at public meetings, that mountain biking is inherently incompatible with other trail use activities and should be segregated from them. This belief is diametrically opposed to our multi-use trails experience in Pima County, where we have achieved a remarkable degree of respectful mutual accomodation between bicyclists, equestrians and hikers. From all indications, a similar level of peaceful coexistence exists among trail users throughout the vest. This is not to say that trail conflicts do not occur; occasionally they do. It appears, however, that as trail users learn their respective responsibilities and begin to apply proper trail etiquette on a consistent basis, conflicts are diminishing in both numbers and severity. With such conflicts now the becoming the rare exception, it would be decidedly unfair to prohibit mountain bicyclists from enjoying many of the same areas in the Safford District that hikers and horsemen have access to. And "unfair" may be putting it mildly. The unreasonable denial of access to mountain bikers would probably be more accurately characterized as an infringement upon their civil liberties.

Mountain bicyclists in southern Arizona are disappointed that the Safford District BLM office has shown a marked indifference towards accomodating their legitimate recreational needs. The enthusiasts I have spoken with enviously point to the cordial, cooperative relationship that has developed between the BLM and mountain bikers in eastern Utah and western Colorado--a relationship that has *resulted* in the establishment if the magnificent 115-mile Kokopelli mountain bike trail--and wonder why a similar cooperative relationship can't exist in southern Arizona. Regardless of how the Safford District staff may feel about mountain biking, it is an undeniable fact that more and more off-road bicyclists will be recreating in the Safford District in the years to come, and the possibility exists that mountain bikers may become the largest single group of sportspersons to utilize the Safford District for recreational purposes. As taxpayers who support these lands as much as any other recreational group, the responsible, environmentally aware mountain bike enthusiasts of southern Arizona would like to receive all of the access that they rightly deserve.

Steve Anderson

-Steve Anderson

Name: Steve Anderson

Representing: Pima Trails Association*

Address: 901 S. Santa Ana Drive

Tucson, AZ 85710

Date: March

*Board member representing off-road bicyclists.

Trailgrams

GRINDING TO A HALT

Dear *MBA*,

When reading bike tests, I always notice the comments regarding "good tire clearance." What is considered good tire clearance? Also, is there any advantage to using S-bend (also called double-bend) chainstays over single-bend (nine-degree) chainstays? Do they offer more strength or more tire clearance?

Rick Crowe
Troy, NY

To tell the truth, "good tire clearance" is approximately a half-inch; anything less than 3/8-inch is poor, and over a half-inch is excellent. Tire clearance is important for riders who might want to switch to wider tires, especially some of the new 2.5 tires, or who ride in mud, sand, wet leaves or mulchy terrain. The

advantages of S-bend stays are increased tire clearance and increased chainring clearance. The double bends weave in between the problem areas. They are not stronger than single-bend stays.

MINDING OUR Ps & Qs

Dear *MBA*,

I never expected to write a letter to a magazine, and I certainly never thought it would be to a magazine that I've neither read nor heard of until today. You see, I don't ride mountain bikes, I ride horses. I'm writing this letter because I want to express my appreciation to all those responsible for creating such a wonderful attitude in mountain bike riders. A few years back, when mountain bikes started appearing on the trails, we horseback riders were dismayed by their lack of courtesy and, in some cases, their outright rudeness. We all hoped that the park district would ban bikes from the trails. To my surprise and delight, mountain bike riders have somehow miraculously transformed themselves into the most pleasant, courteous and thoughtful group of trail users I have ever seen! Every bike rider I have encountered in the last year on the trails has been very understanding and thoughtful towards me and my horse, and I try to always thank them for their courtesy. I'm proud to share the trails with the mountain bikers now. I realize horseback riders can be inconsiderate and discourteous, too, so I wanted you to know that this horseback rider, at least, has noticed and thanks you all.

Sue Stewart
Lafayette, CA

Thank you, Sue. All mountain bike riders can learn a lesson from Sue's letter. When you see a horse and rider on the trail, pull over and let them pass. Bicycles, even ones moving very slowly, can spook a horse. Why risk injury to someone to save a few seconds? Stop and have a swig out of your water bottle. Be friendly, be positive and share the trails.

This letter strongly suggests that mountain bikes and other trail users can recreate together successfully.

-S.A.

Life behind Bars

hen you're serious about doing hard time on your mountain bike, you're ready for A-T Four handlebars from Scott USA.

A-T Four: that's short for all-terrain.

four-position handlebars. There's nothing else like them. Anywhere. The proof is U.S. Patent no. 4,750,754.

Only the A-T Four puts you in perfect position over any terrain. One position is just right for jamming up

hill, another streamlines you in an aero tuck, a third is ideal for climbing out of the saddle. As for the fourth, it's the only position other bars offer.

The way we figure it, standard bars are for standard mountain bikers. The A-T Four is for those of you committed to a life behind bars.

SCOTT

Post Office Box 2030 Dept. M
Sun Valley, Idaho 83353
208 726-7267

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Box 122 Bio Science West
University of Arizona
Tucson, Arizona 85721

31 March 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E 4th street
Safford, Arizona a5546

Dear Mr. Knox:

I have the following comments regarding the BLM Safford District Resource Management Plan and draft Environmental Impact Statement (Dec 1989).

1. I generally support the recommendations for ACEC's and hope to see rapid implementation of the prescribed actions to restore these areas.

2 Gila ACEC: I agree recommended prescriptions under Alternative A, except that I prefer the additional ones under Alternative B including the inclusion of more public lands and closing the river bottoms to off-highway vehicular we, but I am not in favor of suppression riparian areas.

3. Turkey Creek Riparian ACEC: I agree with the prescriptions in the Preferred Alternative except that I tthink you should include the suggestion from Alternative B about suspension of livestock grazing. In addition, I recommend clang more roads within the area and even blocking access to Turkey Creek at Aravaipa Creek. Turkey Creek is another of our with it Oak Grove Canyon. Within the steep-walled narrow sides of Oak Grove is beauty as magnificent as those In addition, Oak Grove held (and may still contain) one of Arizona's only Unfcknown roosts of Allen's Big-eared Bats (*Idionycteris phyllotis*). the canyon is Littered manure and human trash, evidence that disturbance comes too frequently to wildlife within the canyon.

4. Guadalupe Canyon Outstanding Natural Area ACEC: Because of its proximity to Mexico, this riparian area offers a corridor for individuals to move between populations living in both Mexico and the U.S. Such wildlife corridors are essential to restock dwindling islands of habitat. I prefer Alternative B.

5. Aravaipa Canyon Wilderness Additions. I prefer the addition of as much land to the Aravaipa Wilderness as is possible. I would then like to see it closed to livestock grazing and most vehicular use. In addition, I would like to see a decrease harvests of deer in the immediate areas to encourage predators into these areas.

6. Eagle Creek Canyon Outstanding Natural Area ACEC: I strongly recommend the suggestion in alternative B of the Eagle Creek Bat Cave ACEC to acquire 3160 acres of public land in Eagle Creek Canyon to join this parcel to the Gila Box ONA/Wilderness Area.

Thank you for preparing this document for review. I encourage you to protect our public lands in the and native ways possible for our present enjoyment in terms of conservation and preservation. Sincerely,

Ronnie Sidner

Ronnie Sidner

91

GSA Resources Inc.
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Cortaro, Arizona 85652
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April , 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, AZ 85546

Dear Mr. Knox:

I have reviewed the Safford District Draft Resource Management Plan EIS and have a number of comments. Most apparent is the inadequate coverage of Management concern 4 Energy and Minerals. The Safford District as reported in Table 3-1 an page 131 has a production in excess of $80 billion dollars. It is one of the largest mineral producing areas in the world, and it is reasonable to expect that other major mineral deposits will be discovered.

91-1 The Resource Management Plan also completely failed to cover the production of industrial minerals. None of the areas proposed for withdrawal, have had mineral evaluations, metallic or industrial minerals, none were noted in the Plan. The value of industrial mineral production Safford district was not noted, or included in Table 3-1.

The Ill Ranch RNA ACEC, for example, covers portions of the Whitlock Diatomite Deposit. I suspect there are valid mining claims in this area. The Compendium on Non-Metallic Minerals in Arizona notes "there are still several hundred acres of relatively undisturbed diatomite...faces of good diatomite 30 to 40 feet thick can be observed". No information on this deposit is included by the BLM, despite proposing this area for mineral withdrawal.

91-2 We are also concerned about Riparian Areas, particularly #37, shown on map 34. This covers all of the Bowie chabazite deposit, the only productive deposit of the zeolite mineral chabazite in the world. The Draft Management Plan has 3 statements concerning the Bowie deposit. Only one is correct, the deposit is north of Bowie in the San Simon Valley. However, the majority of chabazite production is from unpatented Federal mining claims, not from parented claims as stared in the Resource Plan.

Union Carbide Corporation, Letcher and Associates, The Norton Company, East-West Minerals, NRG, Incorporated, Geraldine Connell, and GSA Resources, Inc. all hold valid unpatented mining claims in this area. In addition, GSA Resources, Union Carbide and East-West Minerals also hold valid State Mineral Leases an split estate lands in which the surface is managed by the BLM. To date chabazite with a product value of about has been produced from this deposit. There must be some awareness of

this activity by the BLM, since this area has filed the largest number of notices and mining plans in the Safford District as noted on page 132 Map 31.

Finally, we have serious concerns about the misuse of ACEC's by the BLM. The ACEC's appear to be used to manage public lands as defacto wilderness areas without meeting the criteria mandated by Congress. The III Ranch RNA ACEC and the Bear Springs Badlands ACEC are good examples. Both contain identified resources of Industrial minerals. Neither to my knowledge has had a mineral inventory, but both are proposed to be closed to mineral entry.

91-3

The III Ranch RN4 ACEC has diatomite deposits and the Bear Springs Badlands ACEC contains deposits of clay and natural zeolites. There are no compelling reasons to close this area to mineral entry. The mechanisms which formed these valuable mineral resources, are also responsible for the fossil assemblages present in these areas. If is absurd to close an area to mineral entry, because of the common fossil assemblages found in the area. Clearly, this is not a unique resource. Similar fossil assemblages are found in tertiary basins throughout the western United States.

It would appear that the Resource Management Plan as proposed has serious deficiencies. It is unclear how mineral development will be impacted by the designated Riparian Areas. The proposed

81,000 acres of ACEC's constitute nearly 6% of the land managed by the BLM in the Safford district. This defacto wilderness designation is in addition to lands added to wilderness this year, and appears to include areas which were deemed unsuitable for wilderness. There does not appear to be a legislative intent by Congress to allow this type of withdrawal of mineral lands from the public domain.

Attached to this letter is information on the Bowie and Bear Springs deposits. A major problem in managing mineral resources on public lands is the use of mineral needs of the past, to project and allocate resources for the future. But, the minerals of tomorrow are still being discovered. Materials used to fill plastics, make advanced ceramics or build super conducting materials are still being developed. The unique minerals which will be needed supply these resource needs are still being identified.

New minerals like natural zeolites will also play an important role in solving current environmental problems. Zeolites from Bowie are being evaluated for use in the treatment of contaminated mine waters, and are used far the solidification and

disposal of hazardous and nuclear wastes. In fact, the Bowie chabazite was used to decontaminate the Three Mile Island reactor vessel.

Sincerely,

Daniel T. Eyde

DTE /mce

cc: Powell King
New Mexico State Office

Congressman Jon Kyle
Congressman Bob Stump
Congressman Jim Kolbe
Congressman John Rhodes
Senator Dennis DeConcini
Senator John McCain

Bill Epler
Paydirt

ZEOLITE DEPOSITS IN THE GILA AND SAN SIMON VALLEYS OF ARIZONA AND NEW MEXICO

Eyde, *Inc., Cortaro, Arizona 85230*

Abstract

Several deposits of zeolite minerals occur in Cenozoic rocks in the Gila and San Simon Valleys both in New Mexico and Arizona. Zeolite deposits occur not only in the lacustrine beds within the valleys but also in vitroclastic tuff beds intercalated with the volcanic rocks that form many of the mountain ranges bounding the valleys. Though the geological processes that formed these two types of deposits are diverse, the actual geochemical reactions involved in zeolitic alteration are nearly identical. Zeolite minerals in both types are alteration products resulting from the reaction between volcanic glass and saline-alkaline waters. The saline-alkaline lake deposits that are the subject of this paper are the most important of the two types. These deposits consist of one or more stratiform beds of high-purity zeolite minerals interbedded in lacustrine beds. The deposits are the alteration product of volcanic ash initially ejected into the atmosphere by distant volcanism during Pliocene–Pleistocene time. The vitric phase of the airborne volcanic ash was carried large distances by the prevailing winds and eventually deposited in shallow lakes in the Gila and San Simon Valleys. Following deposition, the ash reacted with the saline-alkaline lake waters to form zeolite minerals. Sedimentary processes in the shallow, saline-alkaline lakes were active before, during, and following the deposition of the vitric ash. Consequently, the degree of zeolitic alteration as well as the thickness and areal extent of the zeolite beds are directly related to the depositional history of the basins. Two zeolite deposits in the San Simon and Gila Valleys are in production. The zeolite deposit near Bowie, Arizona has produced chabazite used to purify sour natural gases and also to remove cesium 137 and strontium 90 from liquid nuclear reactor wastes. The zeolite deposit near Buckhorn, New Mexico, produces clinoptilolite used to denitrify sewage effluent and to produce organic fertilizer from poultry manure. The chabazite deposit in the Dripping Springs Valley has been explored by drilling. Several unexplored chabazite deposits occur in the vicinity of Bear Springs, near Pima, Arizona.

Introduction

Zeolites are a group of 34 separate mineral species which are crystalline, hydrated aluminosilicates that contain exchangeable alkali or alkaline-earth cations. Extensive deposits of high-purity zeolite minerals occur in both Cenozoic age volcanics and sedimentary rocks of volcanic origin. Both natural zeolite minerals and their synthetic counterparts, which are known as molecular sieves, are used in pollution control, radioactive-waste management, petroleum refining, and gas-purification processes. Natural zeolite minerals are also used in construction materials, in carriers, fillers, and coatings, aquaculture, and agriculture. Major future uses will include waste-water treatment, solar energy, and synthetic-fuel production.

Zeolite deposits of the Gila and San Simon Valleys

The zeolite mineral chabazite was tentatively identified by Lowe (1875) in an outcrop of volcanic tuff about 4 mi south of Whitlock Cienega. This is believed to be the first published account describing a bedded zeolite deposit anywhere in the world. Not until 1959 was this same chabazite deposit, now known as the Bowie deposit, rediscovered by geologists of the Linde Division of Union Carbide Corporation. The Dripping Springs, Bear Springs, and Buckhorn deposits were discovered during the same exploration program during 1960 and 1961. All of these deposits occur in the basins filled with late Tertiary lacustrine sediments in the Gila and San Simon River drainages in Arizona and New Mexico (fig. 1). A more de-

FIGURE 1—LOCATION MAP OF THE ZEOLITE DEPOSITS IN THE SAN SIMON AND GILA RIVER VALLEYS.

[New Mexico Bureau Mines & Mineral Resources, Circular 182, 1982]

tailed exploration program in these basins would certainly result in the discovery of additional bedded zeolite deposits.

Extensive deposits of the zeolite minerals clinoptilolite and mordenite occur in the Cretaceous and early Tertiary volcanics in the Whitlock Mountains, Blue Range, Mogollon Mountains, and Coronado Mountains. The deposits were formed from the alteration of thick vitrophyre, vitric tuff, and vitroclastic tuff members in the volcanics. Though the deposits are large, most of them would require extensive beneficiation to produce a marketable product. Even though the geochemical reactions involved in the zeolitic alteration are nearly identical, the origin of these deposits differs significantly from that of the deposits formed in a saline- or alkaline-lake environment. Discussion of these deposits is beyond the scope of this paper.

Several zeolite deposits occur in Tertiary lacustrine beds exposed in the San Simon and Gila River drainages of southeast Arizona and southwest New Mexico. The most important deposits are the Dripping Springs Valley chabazite deposit near Winkleman, Arizona, the Bear Springs chabazite deposits near Pima, Arizona, the Bowie chabazite deposit near Bowie, Arizona, and the Buckhorn clinoptilolite deposit near Buckhorn, New Mexico. These deposits formed during Pliocene–Pleistocene time when vitric ash ejected by volcanic activity in the far western United States was carried eastward by the prevailing winds and deposited in a series of saline-alkaline lakes that occupied the present San Simon, Gila River, and adjoining valleys.

The vitric ash reacted with the saline-alkaline waters contained in the lake to form zeolite minerals. The size of the vitric ash particles apparently is inversely proportional to the distance from the source. Thus, the more distant the source, the smaller the individual particles. In addition, the smaller the particle size, the larger the surface area of vitric ash available for reaction with the saline-alkaline water. In general, the zeolite deposits in the San Simon and Gila River valleys contain more chabazite and are significantly thinner than similar deposits in California, Oregon, and Nevada. This may be because the deposits in the San Simon and Gila River valleys were farther from the source of the volcanic ash and, consequently, the basins received a thinner fall of finer-grained ash. It may also explain why the zeolite deposits are generally thinner, the size of the individual crystals smaller, and the deposits of higher purity. However, it does not necessarily explain why chabazite is often the most common zeolite mineral in these deposits.

Dripping Springs Valley, Arizona Chabazite Deposit

A chabazite-bearing tuff horizon is exposed in a road cut on the east side of Arizona State Route 77 about 23 mi south of Globe, Arizona. The Anaconda Minerals Company acquired the deposit in 1978 and since then has drilled over 100 holes to explore it.

The chabazite horizon is interbedded in a section composed of brown mud, sandstones, and limestones of probable Pliocene–Pleistocene age. The lacustrine beds are nearly flat-lying but dip gently toward the center of the Dripping Springs Valley. In the roadcut the chabazite horizon consists of three lithologies: a lower thin-bedded to platy bed, a middle massive bed, and an upper thin-bedded to platy bed. Total thickness of the chabazite is nearly 2 ft. Sampling done in 1960 indicated that the middle massive bed averages approximately 67% chabazite. Drilling by the Anaconda Minerals Company revealed that the deposit consists of two chabazite-bearing horizons separated by what Anaconda geologists refer to as the red claystone bed which is about 5 ft thick.

The Anaconda drilling program showed that the lower zeolite horizon ranges from 0.50 to 1.74 ft thick and consists of three distinct lithologies that include a lower bed 0.15–0.87 ft thick consisting of zeolitically altered vitric ash and about 10% detrital matter. This bed is overlain by and in sharp contact with a bed 0.14–0.20 ft thick, consisting of a laminated, thin-bedded, zeolitically altered vitric ash containing a trace of detrital matter in addition to a trace of clay and calcite. Overlying this bed is a massive bed 0.30–0.67 ft thick of zeolitically altered vitric ash. The bed grades upward into the overlying red claystone.

The lower zeolite horizon grades from a clean unaltered vitric ash at the north end of the deposit to 90% chabazite at the south end of the deposit. The only other zeolite mineral present in the deposit is a trace of clinoptilolite. A system of paleo channels that flowed across the deposit has removed large portions of the deposit.

Bear Springs, Arizona Chabazite Deposits

Three chabazite-bearing tuff horizons crop out on the east side of the Gila River valley near Pima, Arizona. Two horizons crop out near Bear Springs in sec. 1, T. 7 S., R. 23 E. The other crops out in sec. 27, T. 6 S., R. 24 E. Heindl (1958) locates all three zeolite horizons in the Solomonsville beds (Pliocene–Pleistocene) which are lacustrine beds composed principally of brown mudstones with a few beds of limestone, sandstone, and conglomerate. Many of the brown mudstone beds contain unaltered, vitric-ash shards. The Solomonsville beds dip gently toward the center of the Gila River valley, the apparent center of the depositional basin.

The chabazite-bearing tuff horizons were vitric-tuff beds zeolitically altered to the minerals chabazite and erionite. As is the case at the Bowie chabazite deposit, the individual chabazite crystals are usually less than 0.20 microns in size. Because of this extremely small size, it is difficult to determine accurately the percentage of chabazite and erionite in the zeolite horizon. The most abundant zeolite mineral is chabazite followed by erionite, and occasionally small amounts of phillipsite.

Two chabazite-bearing tuff horizons separated by about 30 ft of brown mudstone with a few thin interbedded sandstone beds crop out at Bear Springs. The lower chabazite horizon averages about 1.5 ft in thickness, contains approximately 45% chabazite, and consists of two distinct beds. The lower is a massive, yellowish-white bed 0.50 ft thick that contains about 60% chabazite. Overlying this bed, but separated by a thin clay parting, is a massive yellowish-white bed 1.0 ft thick containing 40% chabazite. The best exposure of the lower chabazite horizon is in banks of the ditch that drains Bear Springs. The lower horizon can be traced by float and intermittent outcrops for nearly a mile along strike.

The upper chabazite horizon is a yellowish to grayish-white, platy to massive, zeolitically altered tuff bed that has an average thickness of about 1 ft and contains approximately 50% chabazite. In unweathered exposures along the road to Bear Springs, the chabazite horizon is composed of a lower massive bed 0.50 ft thick containing approximately 50% chabazite. The upper bed, which is separated from the lower by a thin clay parting, is also about 0.50 ft thick and contains approximately 60% chabazite. The upper chabazite horizon can be traced for about ½ mi along strike.

Another chabazite-bearing tuff horizon crops out about 4 mi northeast of Bear Springs and an estimated 100 ft downsection in the Solomonsville beds. The flat-lying horizon consists of a single yellowish to grayish-white tuff bed 1.0 to 1.5 ft thick that contains approximately 80% chabazite. The bed crops out continuously for about 500 ft along the strike.

Buckhorn, New Mexico Clinoptilolite Deposit

Two clinoptilolite-bearing tuff horizons crop out along the west side of Duck Creek valley in secs. 3, 4 and 10, T. 15 S., R. 18 W. The outcrops are visible approximately ¼ mi west of U.S. 180 from a point about 1 mi south of Buckhorn, New Mexico. Double Eagle Petroleum and Mining Company acquired part of the deposit in 1974 and installed crushing and screening equipment. A small tonnage of sized clinoptilolite produced from the deposit has been sold for use in advanced waste-water treatment (AWT) plants to denitrify sewage effluent. The clinoptilolite has also been used in the production of an organic fertilizer from chicken manure. Leonard Resources acquired a portion of the deposit in 1977 but has not produced any clinoptilolite. No mining has been done at the deposit since 1977.

The clinoptilolite beds are in a nearly flat-lying sequence of lacustrine beds composed of green and brown mud and claystones. Heindl (1958) placed these sediments in the Cactus Flat beds of Pliocene–Pleistocene age. Olander and Surdam (1979), who investigated the mineralogy and depositional environment of the Buckhorn deposit, correlate the deposit with diatomite deposits about 3 mi north of Buckhorn that have been dated at the boundary between early and middle Pliocene or approximately 3 m.y. ago.

These investigators recognized four distinct depositional environments at the deposit: 1) a soil horizon possibly developed along the edge of an alluvial fan, 2) an intermittent stream-channel and adjacent overbank deposits, 3) interchannel, flood-plain deposits, and 4) lacustrine or ponded deposits. This confirms what has been recognized at other zeolite deposits—that sedimentary processes were active in the depositional basins before, during, and following the deposition of the parent vitric ash and also following zeolitic alteration.

The clinoptilolite-bearing tuff horizons are separated by approximately 20 ft of green and brown mudstone. The lower horizon is a yellowish-white massive bed of zeolitically altered vitric tuff ranging from 3 to 5 ft thick (fig. 2). Sampling done in 1961 indicated that the bed contained 70–90% clinoptilolite. More detailed sampling of the zeolite horizon revealed that a lower 0.50 ft bed appears to have been an exceptionally clean vitric, tuff prior to zeolitic alteration and contains approximately 48% chabazite and an equal amount of clinoptilolite. Several samples of the bed contained from a trace to more than 23% erionite. Olander and Surdam (in preparation) also indentified the zeolite minerals heulandite and analcime in addition to smectite/illite, chert, calcite, quartz, and minor amounts of detrital hornblende and biotite.

The upper zeolite horizon is a single 1 ft thick bed of massive, yellowish to grayish-white, zeolitically altered vitric tuff that contains over 60% clinoptilolite and a trace of erionite. Both the lower and upper zeolitic-tuff horizons can be traced for over 1 mi along strike.

FIGURE 2—Lower clinoptilolite horizon at the Buckhorn, New Mexico deposit. The basal 0.50-ft-thick bed clearly visible to the left of the hand contains approximately 48% chabazite.

Bowie, Arizona Chabazite Deposit

The Bowie chabazite deposit is approximately 13 mi north of Bowie, Arizona. The marker-tuff horizon that contains the high-grade chabazite bed at its base crops out discontinuously along the 3,440 ft contour line for approximately 7 mi along both sides of the San Simon Valley. Most of the outcrops and areas being mined are on the southwest side of the valley. Only a few scattered outcrops occur on the northeast side of the valley.

Lowe (1875), in possibly the first reference to a bedded zeolite deposit, described an outcrop of what appears to be the chabazite-bearing tuff horizon approximately 4 mi south of Whitlock Cienega. He described the zeolitically altered tuff as a yellowish, soft, porous material that cropped out for about ¼ mi and concluded that the tuff was a mixture of quartz and a hydrous silica related to chabazite or stilbite. The deposit was literally rediscovered 84 yrs later in 1959 by geologists working for Union Carbide Corporation who were attempting to locate the source of a chabazite-bearing ornamental stone being quarried north of Bowie (Eyde, 1959).

Ernest Baugher, a retired railroad engineer from Buffalo, New York, found the outcrops of the chabazite-bearing tuff while rock-hounding in the area. He interested Frank Meadows and Paul Sanger, who both worked for the Southern Pacific Railroad, in the deposit, and the partnership staked the BMS claims that covered the outcrops in the central and northwest end of the deposit. Frank Clark, a butcher in Bowie and a part-time prospector, staked claims covering the southeast end of the deposit. Baugher and Clark quarried the lower massive bed of the marker-tuff horizon and fabricated bookends, lamps, paper weights, and pencil holders from it. These souvenirs made of what was known as "Arizona Tuffa-Tex" could be purchased during the 1950's and 1960's at stores and shops along the Tucson–El Paso highway.

The initial X-ray diffraction analyses of samples from the marker-tuff horizon indicated the presence of only small amounts of chabazite. However, oxygen adsorption analyses of several suites of samples collected from all the lithologies within the marker-tuff horizon revealed that the lower massive bed or the so-called high grade or ore bed was composed of high-purity chabazite (figs. 3 and 4). A subsequent field examination revealed that the lower massive bed could be traced intermittently for nearly 7 mi along the southwest side of San Simon Wash (fig. 5). A re-evaluation of the X-ray diffraction analyses revealed that the microcrystallinity of the chabazite in the marker-tuff horizon produced low, broad peaks that had been incorrectly interpreted in the initial

FIGURE 3—Chabazite (chain-like clusters of small crystals) and erionite (large crystals) from the high-grade bed at Bowie.

analyses as indicative of a low chabazite content. This microcrystallinity is apparent in scanning electron micrographs of the ore bed.

In April 1961, the Linde Division of Union Carbide Corporation staked claims covering most of the deposit behind the outcrops that were still covered by claims held by Baugher and Clark. In 1965, the Davison Chemical Division of W. R. Grace acquired the southeast end of the deposit. In subsequent years, the Norton Company, Letcher and Associates, *NRG Incorporated, Filtrol Corporation*, and the Anaconda Minerals Company purchased claim groups either not acquired or dropped by Union Carbide following the completion of the exploration drilling program in 1963.

FIGURE 4—Chabazite (chain-like clusters of small crystals) and clinoptilolite (large crystals) from the high-grade bed at Bowie.

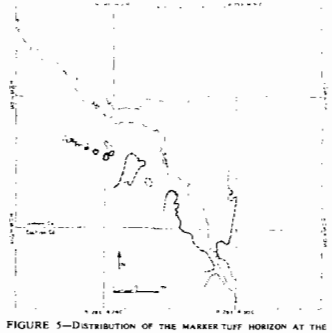

FIGURE 5—Distribution of the marker tuff horizon at the Bowie chabazite deposit.

Over 3,000 holes have been drilled to explore the deposit. Production records are unavailable. However, based on an estimate of the area mined since 1962, it appears that the deposit has produced about 12,000 tons of crude chabazite. Activated natural chabazite sells for $1.50 to $1.60 per pound. Therefore, after deducting moisture, mining, and processing losses, the estimated market value of the activated chabazite produced would be nearly $30,000,000. Reserves are adequate to sustain the current production rate of approximately 1,000 tons per yr indefinitely.

The Bowie deposit is mined by strip-mining techniques. In *order to produce the highest purity chabazite possible, it is* necessary to carefully remove all the overlying low-grade bed and the underlying green clay from the high-grade bed. This operation requires a great deal of hand labor. After mining, the chabazite is stored in warehouses in Bowie for drying and is then shipped out of state by rail for processing. The chabazite is crushed and ground to minus 200 mesh, mixed with a binder, extruded into rods or pellets and activated by calcining at a temperature of 800°F. Chabazite from Bowie, Arizona is superior to synthetic zeolites for certain specialized applications. Chabazite from the Bowie deposit is stable at a *pH as low as 2.5 which makes it suitable* for removing hydrogen chlorine from hydrogen streams, water from chlorine, and sulfur dioxide from stack gases (Mumpton, 1975). Chabazite from Bowie is used in a gas treatment plant at the Salt Lake oil field near Los Angeles, California to remove water, carbon dioxide, and hydrogen sulfide from casing-head gas. It is also used to purify methane at the Palos Verde, California land fill. Natural chabazite from Bowie has been used successfully to recover cesium 137 from nuclear-reactor effluents. Most recently, chabazite from the Bowie deposit has been used in a blend of natural and synthetic zeolites to remove the radioactive elements from the water at the damaged nuclear reactor at Three Mile Island, Pennsylvania.

The aerial view of the deposit taken in 1960 shows that the marker-tuff bed formed prominent outcrops that extended toward the center of the San Simon Valley (fig. 6). Most of these outcrops were removed by mining operations. These outcrops were along the southwest side of the valley. Only a few scattered outcrops occurred on the northwest side of the valley and these were nearly obscured by sand dunes.

An examination of the marker-tuff horizon (fig. 7) reveals two lithologies. A lower massive bed is known as the high-

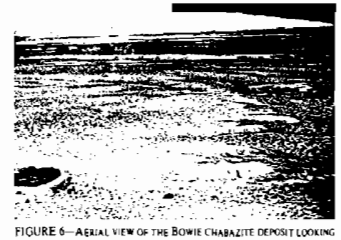

FIGURE 6—Aerial view of the Bowie chabazite deposit looking northwest. This photograph was taken in 1960 prior to the start of mining operations.

grade or ore bed (Sheppard and others, 1976) and the over*lying bed is known as the thin-bedded or low-grade bed. The* low-grade bed is a grayish or yellowish-white, zeolitically altered, vitric-tuff bed that contains numerous clay partings near the base and mud and sand partings toward the top. The upper bed grades into the overlying green and brown mudstones. Ripple marks are common particularly near the contact with the underlying high-grade bed. The upper bed, which is usually very thin or absent in the northwest part of the deposit, is from 3 to more than 5 ft thick near the center of the deposit and thins again to less than a foot thick at the southeast end of the deposit.

The mineralogy of the upper bed is not well known. Even though several hundred drill holes have penetrated the upper bed in the central part of the deposit, only a few intersections were collected and still fewer of these were analyzed. The mine operators regard the upper bed as a mining problem rather than a mineral resource because the bed is difficult to strip without disturbing the underlying high-grade bed. It is known that the upper bed contains several facies with distinct zeolite-mineral assemblages that can be correlated between drill holes across the central part of the deposit. The upper bed contains approximately 40% chabazite and significant amounts of erionite and clinoptilolite. Preliminary tests indicate that the upper bed can be beneficiated to a final product containing 85% zeolite minerals in about 50% of the original weight (Mondale and others, 1976). The upper bed is a potentially valuable mineral resource that is presently being wasted.

The lower massive bed is a yellowish- to brownish-white, zeolitically altered vitric tuff that ranges from less than 0.10 to 0.70 ft thick. It contains from 60 to 90% chabazite, from a trace to more than 15% erionite, and small amounts of clinoptilolite. The microcrystallinity of the zeolite minerals makes accurate estimates of the exact percentage of each mineral present difficult. Unquestionably, the principal mineral constituent of the high-grade bed is chabazite. The mine operators attempt to produce a consistently high-grade product. Consequently, those portions of the deposit that have a relatively higher erionite content and, therefore, a lower chabazite content exhibit a significantly lower adsorp*tion capacity. Depending on the adsorption capacity, the* operators either do not mine the bed or blend it with higher purity material to produce chabazite with a consistently uniform high-adsorption capacity.

The marker-tuff bed was deposited in a closed lacustrine basin that was confined to the present San Simon Valley. The bed is enclosed in green lake beds that consist of a section of green and brown clays having an unknown thickness. Edson (1977) has identified the clay minerals as a non-interlayered mixture of smectite and illite. He also reports that one of the holes drilled by the U.S. Geological Survey in 1972 intersected *another zeolitic tuff horizon within the green lake beds about* 77 ft below the marker-tuff horizon. This is not surprising, because more than one zeolitic-tuff horizon occurs at all of the other zeolite deposits in the San Simon and Gila River valleys.

The airborne vitric ash was deposited in a shallow saline-alkaline lake subject to large fluctuations in depth (fig. 8). During dry cycles, the marker-tuff bed was exposed at the surface when parts of the lake dried up. During wet cycles, this bed was again submerged and covered by green and brown clays when sedimentation resumed. Several areas occur within *the deposit where the marker tuff bed was exposed at the sur*face, eroded, and then covered by more green clay. Some of the changes in mineralogy that have affected the adsorption and cation-exchange capacities of the high-grade bed may be correlated with these weathered areas.

The northwest end of the lake was shallow. This interpretation is supported by the discovery of tracks of an extinct llama and camel in the clay beds beneath the chabazite bed (fig. 9). A network of small streams flowed into the shallow northwest end of the lake. These fresh-water streams distributed and reworked the vitric ash prior to zeolitic alteration. Zeolitic

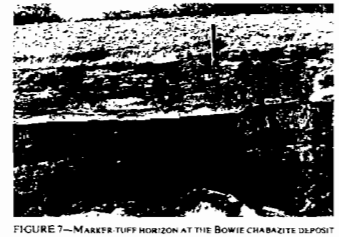

FIGURE 7—Marker-tuff horizon at the Bowie chabazite deposit showing the lower massive high-grade bed and the overlying, thin-bedded, low-grade bed.

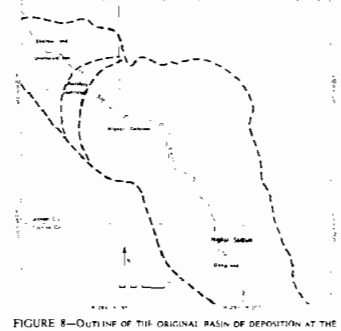

FIGURE 8—Outline of the original basin of deposition at the Bowie chabazite deposit.

FIGURE 9—CASTS OF LLAMA TRACKS IN THE HIGH-GRADE BED OF THE BOWIE CHABAZITE DEPOSIT.

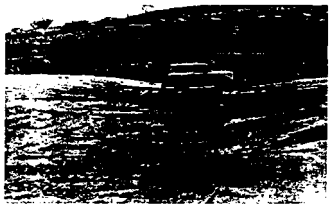

FIGURE 11—DEPRESSION IN LAKE BOTTOM AT BOWIE CHABAZITE DEPOSIT. The high-grade bed that has been cleaned but not mined was much thicker in the depression.

alteration apparently did not occur either in or adjacent to these stream beds. These so-called contemporaneous channels are filled with fine sand and unaltered vitric ash. In the northwest end of the deposit, closely spaced drilling is required to locate these channels prior to stripping and mining operations.

The initial ash fall after compaction appears to be about 0.1 ft thick and can usually be seen in the drill core as a thin white layer that approaches 100% chabazite at the base of the high-grade bed. Streams transported the ash deposited on the adjacent watershed into the lake where currents and the topography of the lake bottom controlled its distribution (fig. 10). The high-grade bed is thickest along depressions in the lake bottom (fig. 11).

The mineralogy of the high-grade bed in the marker-tuff horizon changes from the shallow northwest end to the deeper southeast end. Near Ryan Dam at the northwest end of the depositional basin, the marker-tuff horizon is a clean, white, unaltered vitric tuff that grades into a partially altered vitric tuff and then into the typical high-grade bed to the southeast. The northwest end of the deposit was a calcium-rich environment characterized by the occurrence of calcite concretions within the high-grade bed. The chabazite is a high-calcium variety that has a light-yellow color. Gypsum does not occur in the northwest end of the deposit. The southeast end of the deposit was a sodium-rich environment characterized by the occurrence of thenardite within the high-grade bed. The chabazite is a high-sodium variety approaching the composition of herschelite (Regis and Sand, 1967) which has a dark-orange-brown color. Both gypsum and analcime are common in the southeast end of the deposit.

FIGURE 10—A CONTEMPORARY CHANNEL FILLED WITH GRAY SAND AND UNALTERED ASH CUTTING THROUGH ORE BED AT BOWIE. Direction of flow was from the lower left toward the top of the photograph.

The change from a calcium-rich to a sodium-rich depositional environment is gradational over a distance of 7 mi. Interestingly, the increase in sodium content is also reflected by the color of the high-grade bed. High-calcium chabazite is a light-yellowish-white color and high-sodium chabazite is an orange-brown color. Previous workers believed that the orange-brown chabazite contained more iron than the yellowish-white chabazite. However, chemical analyses (Sheppard and others, 1976) show that the yellowish-white, calcium-rich chabazite has a higher iron content than the orange-brown, sodium-rich chabazite.

A system of younger paleochannels has cut through the green lake beds and removed most of the marker-tuff horizon. The deposit in fact consists of several erosional remnants separated by alluvium-filled channels. Subsurface information indicates that the paleochannels on the southwest side of the San Simon Valley flowed to the northeast. Less complete subsurface information from the northeast side of the valley suggests that the channels flowed toward the southwest. This indicates that the paleochannels drained into a major northwest-flowing drainage system near the center of the present San Simon Valley, which also drains to the northwest (fig. 12).

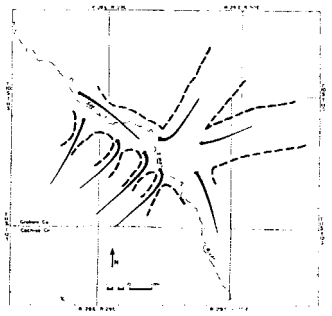

FIGURE 12—MAJOR PALEOCHANNELS AND DIRECTIONS OF FLOW AT THE BOWIE CHABAZITE DEPOSIT.

FIGURE 13—A PALEOCHANNEL (DARK-COLORED AREA NEXT TO BACKHOE) THAT CUTS THROUGH UNMINED, HIGH-GRADE BED AT THE BOWIE CHABAZITE DEPOSIT. Direction of flow is from the bottom of the photograph toward the top.

The channels are filled with sand, coarse gravel, and brown mudstone (fig. 13). Large angular fragments of chabazite from the high-grade bed are found in the channel gravels in areas where the channels intersect the marker-tuff horizon. Small, well-rounded chabazite fragments from the high-grade bed can be found in the channel gravels several miles downstream from the area where the channel cut the marker-tuff horizon. The paleochannels developed after the deposition of the green lake beds and of course after the zeolitic alteration of the marker-tuff bed was complete.

The brown lake beds overlie both the paleochannels and the green lake beds. Subsurface information from the northeast side of the San Simon Valley confirms that the brown lake beds overlie paleochannels that have cut through and removed the older green lake beds and the zeolitically altered marker-tuff horizon. On the southwest side of the valley, the brown lake beds overlie the green lake beds. The basin of deposition for the brown lake beds (fig. 14) appears to have been much smaller than that of the green lake beds. Possibly, the recent erosion associated with the formation of the present San Simon Valley may have removed the brown lake beds from the southwest side of the valley. The brown lake beds are characterized by clay beds that contain disseminated halite crystals. No zeolitic tuff beds are known to occur in the brown lake beds.

Conclusions

The zeolite deposits in the Gila and San Simon Valleys are the result of the alteration of vitric ash deposited in a series of saline-alkaline lakes. Geological evidence suggests that the vitric ash from distant volcanic eruptions did not simply fall into large quiescent lakes with stable levels of water and alkalinity. Instead, the ash appears to have been deposited in shallow lakes in which the water level and alkalinity were variable and sedimentation was active. The successful exploration and development of these zeolite deposits requires an understanding of how these geological processes control their formation.

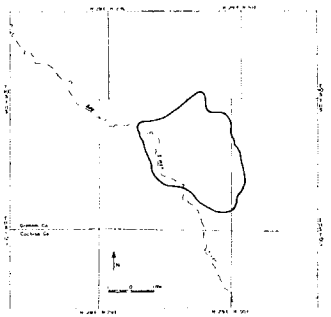

FIGURE 14—DISTRIBUTION OF THE BROWN LAKE BEDS AT THE BOWIE CHABAZITE DEPOSIT.

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Page 199: Eagle Creek Bat

III-23 In Item 4 under the special management prescription, the DEIS calls for acquisition of private lands at the auth of the cave as they become available. This land is not available and will not become available for sale or trade to the BLM Under item 5, alternatives considered, the plan indicates that an ACEC would be established on 3,160 acres of public land in Eagle Creek Canyon with the Eagle Creek Bat Cave included. However, what the plan does not state at this particular point is that this ACEC would include nearly 5,000 acres of private lands. An ACEC which includes 5,000 acres of private lands and only 3,000 acres of federal lands is unmanageable and is an improper ACEC. In addition, all of the riparian zones are included within the private lands and not in the federal lands.

Page 203. Red Knolls

'The Red Knolls geologic formation was evaluated for ACEC status based primarily on concern for human safety.' Ye are pleased to see BLN reject closing of areas to protect humans from their own unsafe actions.

Page 202. Trujillo and Turtle Mountain Desert Grassland

We are pleased to see BLN declining to run through a myriad of overprotective designations of an area until the area finally qualifies for inclusion into some protected classification.

Appendix 5: Wild and Scenic River Study Reports - Gila River Box Segment

III-24 The inclusion of the Yild and Scenic River report and recommendations within the resource ❑ nageaent plan reduces the importance of this action and should not be the only means of gathering comments on this particular issue. These studies and recommendations should be noticed separately and should have separate hearings.

In 1981, the U. S. Forest Service and U. S. Bureau of Land Management issued a 152 page study report and EIS regarding potential designation of the San Francisco River as a Wild and Scenic River. Quoting from the letter sent to the President, at the conclusion of that study by the responsible agency. 'Based on the river evaluation, the analysis of alternatives, and the public input, it was concluded that the San Francisco River should not be recommended for addition to the National Wild and Scenic Rivers System.'

The current seven page analysis placed in the Appendix of a 290 page Draft EIS for the Resource Management Plan is a far cry from the previous effort and essentially conceals the issue from all except those who carefully study the DEIS. Certainly the local man-on-the-street who will be affected by this decision (Alt. B) is not aware of the action. Accordingly, the preferred alternative, Alternative A, must be followed for this issue.

Page 232

Again the statement "referring to the last "freeflowing stretch of the Gila River in Arizona.' is used. This should be stated in different terms.

Page 234

III-25 Under the section 5 Local/Regional Social/Economic Considerations, the statement is made that "Designation of the river would not have an impact on this (livestock) activity or any other potential employment in the area." This is simply not true. Designation of wild and scenic rivers for these river segments would definitely have impacts es industry develops In the future and permit issues are raised. Delays in permitting, additional requirements for permitting, and work stoppages resulting from the increased regulation in this particular area irregardless of any real impacts will indeed cost jobs and could significantly affect the future economy of the area. This same section indicates in Graham County 60% of the income is related to government, retail and service sectors. However, this statement refers to dollars paid by businesses which operate in Graham County and not dollars to people who live in Graham county. For instance, it does not include the 450 employees who work at the industrial complex in Greenlee County but yet live in Graham County. This annual payroll of approximately 12 million dollars is excluded from the Graham County figures. If statements regarding economic impacts are to be made in this draft resource management plan, the numbers should be accurate.

The following comments apply to the maps.

Nap 3: Gila Box ONA ACEC. The outline of the ACEC should conform to the recently proposed NCA boundary.

III-26 Nap 21: The outline of Eagle Creek canyon ONA ACEC should include the outline of private lands within the ACEC. This display would graphically illustrate that nearly 5,000 acres of private patented fee lands lie within the ACEC boundary which includes only 3,000 acres of federal lands. This illustration would clearly point out the labored nature of this ACEC and the inability of BLN to manage such an area.

Nap 32: The Gila Box ONA ACEC boundary should be modified to conform to the recently developed Gila Box NCA boundary.

III-27 Nap 35: The map clearly indicates that sections 1 and 12 in T5S R29E are targeted for retention by BLN. These sections contain mining operations on public lands and should not be included in the retention base. They should be targeted for sale or exchange.

III-28 The large Safford district land status map included in the draft RMP inaccurately depicts property ownership in section 12 T5S R29E, by failing to show private land along the San Francisco River.

92

Thomas J. Taylor
Dr. Apt. C
Tempe, AZ 85281

April 2.1990

S teve Knox
RMP Team Leader
Bureau of Land Management
42.5
Safford, AZ 85546

Dear Mr. Knox:

I have recently had a chance to look over a copy of the "Safford District Resource Management Plan". I am writing this convey my comments and opinions on the. it affects Aravaipa Canyon _ areas. It is my view that the value of Aravaipa Canyon is because of its wildness and inaccessibility. These qualities are extremely rare in the modern world and becoming even more rare, so they deserve to be protected. For this reason I generally prefer Alternative B, the establishment of the Aravaipa Watershed ACEC of the RMP, rather than no action or emphasizing production. However, I would prefer to see some changes in this alternative.

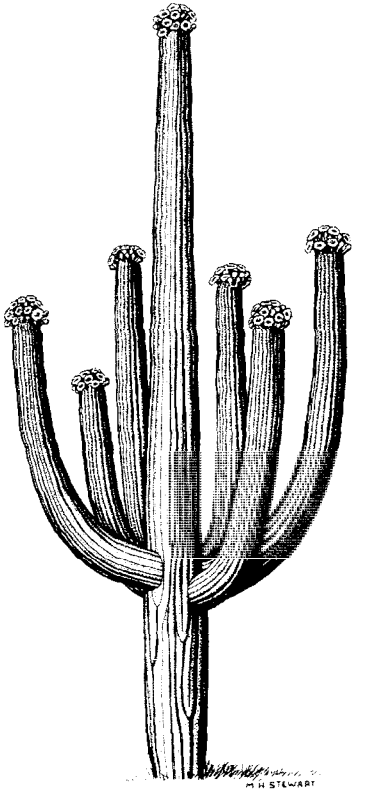
I see no reason for the suggested opening of Virgus Road,as this would increase off-road vehicle use in this area, which would air and noise pollution increasing sediment into Aravaipa creek (and hence impact wildlife and threatened and endemic fish). Surely, with so many Arizona roads already available to ORV navel, by opening balance against the negative environmental impact on this I can also find no benefit in obtaining to Hell Hole Canyon nail; this area is already perfectly reachable from the usual access points, into is simply not needed. I also favor the establishment of the Table Mountain RNA ACEC and the Desert Grasslands RNA ACEC (Pilares).

Thank you for the opportunity to express my thoughts on these matters

Sincerely yours,

Thomas J. Taylor

Thomas J. Taylor



93

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 Berkeley Way, Room 723A
Berkeley, CA 94704
(415) 540-2391

April 3, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. Fourth Street
Safford, AZ 85546

Dear Mr. Knox:

Reference is made to your bureau's 1989 Resource Management Plan, Draft Environmental Impact Statement, Areas of Critical Environmental Concern, Eagle Creek Bat Cave.

I have spent nearly the entirety of my professional career investigating the public health and economic impacts of bats, primarily Mexican free-tailed bats, Over 20 years were spent in the employ of the U. s. Health Service, followed by 14 years state of California Department of Health Services, preceded by over 15 years Of ecological studies on bats. Therefore, I feel justified I" commenting on your proposals.

It is in the best interests of humans to preserve Mexican free-tailed bats and other insect-eating bats. The immense quantities of insects consumed by these mammals reflect their contribution to of insect predators of man, his livestock, crops, forests, environment. Bats are practically alone this protection against the insects that are active from dusk to dawn.

Like all mammals, an occasional bat may develop rabies. But unlike other mammals, especially carnivores such as skunks or foxes, infected Mexican free-tailed bats only weaken and die, never becoming aggressive. Moreover, these bats never experience outbreaks of rabies as carnivores do, only from 0.1 to 0.5% being infected when the virus is present in a colony.

From the eastern United States to eastern Arizona, a generally-distributed soil fungus may multiply in fecal deposits of birds or mammals, including those of bats. When large doses of the fungus are inhaled in fecal dust, a disease may result. The fungus might be present in the cave guano.

93-1 It is [illegible] that man's best interests [illegible] be served by protecting the bats of Eagle Creek Bat Cave, a goal which can be achieved by installing a gate that will keep unauthorized people [illegible] the cave but not hinder passage of bats. Such a gate would have the added advantage of preventing potential exposure of unprotected people to the aforementioned Infections. The cave is especially important as a site of annual reproduction of Moreover, proposals to preserve the surrounding are.5 are equally important, since such areas provide the insect food to sustain the bats during the critical reproductive period when long-distance mobility cm be restricted due to pregnancy or the necessity to care for the nonflying baby bats that remain in the cave. Of course, measures should be taken to preclude molestation of the animals, such as by shooting, or handling of them except by authorized, protected persons.

You are to be commended for your timely proposals.

Sincerely,

Denny G. Constantine, PHW

Denny G. Constantine, DVM, M P H
Public Health Veterinarian
Veterinary Public Health Unit

94

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

ROSE MOFFORD, GOVERNOR
RANDOLPH

2655 E. Magnolia, Suite 2
Phoenix, Arizona 85034

April 4, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, Arizona 85546

Dear

The Arizona Department of Environmental Quality (ADEQ) has reviewed the Safford District Resource Management Plan and draft Environmental Impact Statement (RMP/EIS). We appreciate the opportunity to comment on the document.

The San Pedro and Upper Gila drainage basins would be affected by the changes in land management proposed by the RMP. The 1988 Nonpoint Source Assessment Report identifies the primary water quality problems in these systems as follows:

San Pedro River drainage basin:

Out of a total of 694 miles of stream reach in the San Pedro drainage basin the ADEQ has assessed almost a third, finding that 206 miles are in partial support of state water quality standards while 21 miles fail to meet minimum accepted levels. Principal contaminants include elevated sediment/turbidity, vith associated low levels of dissolved oxygen: high metal content and accompanying acidity problems; elevated nitrate levels. Grazing and mining are suggested as the probable contributors of these pollutants. A 1976 inventory showed accelerated soil erosion for over 15 percent of the grazing land in the San Pedro basin.

Upper Gila River drainage basin:

The upper Gila River drainage basin contains 920 miles of stream reach: the ADEQ assessed 378 miles for water quality problems, identifying 346 miles in partial support and 23 miles in nonsupport of state water quality standards. The Upper Gila basin is characterized by elevated turbidity and sedimentation, with grazing, agricultural irrigation, and silviculture the suspected sources. Mining and waste disposal also degrade water quality in the basin

Both the San Francisco and Blue Rivers, components of the Upper Gila Basin, show poor watershed conditions on 75,600 and 83,500 acres, respectively. Grazing and poor forest road conditions are responsible for the degradation.

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Central Palm Plaza Building 2005 North Central Avenue Phoenix, Arizona 85004

The ADEQ supports Alternative A, which acknowledges the need to protect the district's resources while accommodating the demands of multiple use. However, as identified in the RMP, the Safford District riparian areas account for only five percent of the district's land area. As these increasingly threatened riparian resources have a beneficial effect on water quality, serving as buffer zones that slow the influx of sediment and chemical contaminants into the stream system, the ADEQ recommends that the protection of riparian areas receive priority in water quality management schemes. In particular, the ADEQ believes the following riparian areas should receive the increased protection afforded by Alternative B:

Bonita Creek:

The unique qualities of this system, as a domestic water source, a habitat for diverse fish and wildlife populations, and a rich archaeological site are well documented in the RMP. From the standpoint of water quality protection, Bonita Creek would be best served by designating and managing the Bonita Creek Area of Critical Environmental Concern (ACEC) a s stipulated under Alternative B. This would increase the ACEC from 1.572 acres to 30,243 acres, thereby including the entire watershed into the ACEC management strategy. This would guarantee an increased level of protection for this valuable stream system.

Aravaipa Creek:

Under Alternative A a total of 2376 acres would be designated an ACEC, primarily to protect two riparian woodlands. Due to the importance of Aravaipa Creek, as a recreational resource, wildlife habitat, and domestic water source, the ADEQ urges the BLM to consider designating the entire 78,000 acre Aravaipa Watershed ACEC outlined in Alternative B. This would provide the greatest level of protection to the resources of Aravaipa, complementing the 6700 acres currently designated as wilderness.

As grazing, mining, and off-highway vehicles (OHVs) are significant contributors of nonpoint source pollution to waterbodies in the Safford District, the ADEQ recommends the BLM incorporate the following measures into the final EIS:

1) Close all riparian areas to OHV use and construct fencing to exclude livestock from all riparian areas. Both measures would preserve riparian vegetation and reduce erosion and sedimentation.

Knox
April 4, 1990
Page 3

2) Implement mining restrictions on 200,849 acres, as proposed in Alternative B. This action would significantly improve water quality, since water quality in the Safford District is adversely impacted by resource extraction activities at the present time. In addition! we recommend that mining restrictions, including prohibition of sand and gravel operations, be implemented in all riparian areas, due to the degrading effect these activities have on water quality.

The ADEQ commends the Safford District for its efforts to protect its resources, particularly soil and water, and to rehabilitate those areas currently in unsatisfactory condition. We hope our comments are useful.

Sincerely,

Carol Russell

Carol Russell
Manager, Nonpoint Source Unit

CR:csw

95

University of Illinois
at Urbana-Champaign

Museum of Natural History
438 Natural History Building
1301 West Green Street
Urbana, IL 61801

College of Liberal Arts and Sciences
217 333-2517

April 3, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
Safford, AZ 85546

Dear Mr. Knox:

The opportunity to protect a colony of bats should certainly be taked advantage of by all concerned. Colonial, cave-dwelling bats are the most susceptible to severe endangerment. These bats are in large numbers in a relative small area where man can harm them in a variety of ways.

The large concentration of free-tailed bats in Eagle Creek Cave is a good example. Many things that humans can and will do in such a cave can harm and destroy these bats.

The Indiana bat, _____ in winter is a colonial cave-dwelling bat. The entire species occupied a few caves in the winter. Disturbances in these cave* caused great destruction of these hats.

All efforts should be made to protect the colony of free-tailed bats in Eagle Creek Cave. The area should be fenced and gait-ed in such a fashion that humans do not have access to the bat area. Such fencing and gates should not hinder the free movement of the bats.

I urge all agencies involved to act quickly to protect Eagle Creek Cave in as natural a condition as possible for all wildlife, and from the foibles of humans.

Yours truly,

Donald F. Hoffmeister

Donald F. Hoffmeister
Professor of Ecology, Ethology and Evolution and Director, Museum of Natural History, Emeritus

96

PIMA TRAILS ASSOCIATION
5660 Paseo de la Tirada
Tucson, Arizona 85715
(602) 577-2095

Ray A. Brady, District Manager
u. s. Bureau of Land Management
Safford District Office
425 East Fourth Street
Safford, Arizona 85546

April 3.1990

Dear Mr. Brady,

We appreciate being given the opportunity to comment on the proposed Resource Management Plan for District. Four PTA members served on a committee to review this plan: Jan Nathanson, Steve Anderson and Janice Luepke. main focus of PTA is trails, we reviewed the aspect and did not address other issues.

We have the following recommendations/changes:

96-1 1. PTA is in favor of non-motorized multi-use of the trail system in Pima County. We also endorse the 700-mile long Arizona Trail, which is non-motorized We believe motorized OHV be limited in certain areas of the RMP. We have a very good relationship with the mountain biking Southern Arizona, and would like to see mountain bike to other is patently unfair to group mountain bikes motorized off-road vehicles. We request bikes be deleted from the OHV category instead put into There is no more environmental impact from these recreationists than from that of hikers or equestrians. The only damage that occurs is when any trail user strays from the established trails and goes "cross-country". We this. There can be compatibility on the trails if trail users follow proper trail etiquette.

2 Designation of certain trails as "suitable for mountain bikes" would offer these enthusiasts a wider opportunity to enjoy Arizona. Areas of steep slopes/switchbacks/obstructed views would not be multi-w with mountain bikes, as there are too many hazards involved. Adequate trail signage, etiquette guidelines, should at all trailheads. PTA Board Member biker, Steve Anderson, has agreed to help form a committee to meet with you staff to evaluate and designate mountain bike trails.

3. Adequate parking areas for horse trailers need to be established or expanded at trailheads and campgrounds. Corrals need to be erected where needed at campgrounds.

4. been much concern expressed in regards to the Virgus Canyon Road proposed reconstruction southwest of Canyon Wilderness Area. This is a pristine area and no encroachment by OHV use should be permitted this close to the wilderness area.

Thank you again for your support. We would appreciate being kept informed about this study. Please don't hesitate to call if you have questions or need help.

Sincerely,

Jan Nathanson

Jan Nathanson, Resident
Anne Britt, Vice-President
Steve Anderson, Board Member
Janice Luepke, Member

cc. PTA Board
Janice Luepke

97

Geldmacher
Holy Joe Ranch
ACSR Box 4262
Winkelman, AZ 85292
April 3, 1990

Steve Knox
RMP Team Leader
BLM, 425 E. 4th St.
Safford, AZ 85546

RE: Safford District Draft RMP/EIS; ARAVAIPA CANYON

Dear Mr. Knox:

Hopefully , the approach you have taken will permit public comment on wilderness expansion to proceed within, and concurrently with, the RMP. It was certainly confusing and confrontational in the past not to be able to dicuss their interrelationship during public comment periods devoted singularly to one or the other.

Alternative A, the preferred alternative, has demonstrated the wisdom of this approach. With some additional considerations, it is a reasonable plan for those lands which are now yours, as opposed to the MFP of ten years ago; which was a plan for those lands which were not yours. It involves only minimal acquisitions of private lands for administrative sites, which were acknowledged as necessary by Safford Dist. PLAC at that time. Additionally, you are certainly entitled to reasonable vehicular access where none exists.

97-1 The expanded wilderness and proposed vehicular recreational use of the table lands represents a critical social impact that was not addressed, and which requires additional consideration. Current use of the west end Pinal County access road is at the maximum permissible within EPA standards for ambient air quality as related to those who reside adjacent to the right of way.

The National Regional Recreational Facility which you are planning must address the reponsibility for health and safety on and along the west end access road as visitor use increases. It is reasonable that BLM should accept financial responsibility for that use which exceeds current use by owners of in fee lands. The following questions need to be addressed prior to the FINAL RMP/EIS:

97-2 1. Over the period of the RMP/EIS, what is the anticipated visitor day use? Year 1, year 2,.....year15?

97-3 2. Are you prepared to provide the funding necessary to bring the west access road to the safety standards necessary to accommodate this number of visitors?

97-4 3. Are you prepared to provide the funding necessary to bring the west access road within minimal EPA standards for ambient air quality to protect the health of adjacent residents as visitor use increases?

In December, 1979 District Manager Guy Baier agreed to prepare a budget request for funding in FY 1982, (EXHIBIT A).Land status, your ownership; recreational plans, ALTERNATIVE A; cooperative agreements, The Nature Conservancy; dictate that you proceed with this project.

If you are not able to provide for the health and safety of visitors and residents due to regulatory restraints, the only action for the Safford District RMP/EIS relative to Aravaipa Canyon must be ALTERNATIVE D (NO ACTION). A strong effort should then be made to place all Aravaipa public lands within the National Park System in a manner similar to The San Pedro Riparian National Conservation Area so that funding can be made available.

Wilderness expansion should not go forward until this issue is resolved.

Sincerely yours,

Don and Bev Geldmacher

cc: Bill Mathieson
Jim Kolbe
Dennis DeConcini
John McCain
John Rhodes III
Morris K. Udall
Bob Stump
Jon Kyl

United States Department of the Interior

IN REPLY REFER TO
2017

BUREAU OF LAND MANAGEMENT
District Office
425 E. 4th Street
Safford, Arizona 85546

FEB 8 1980

Dr. Donald E. Geldmacher
P.O. Box 668
Kearny, Arizona 85237

Dear Dr. Geldmacher:

As we agreed at our December meeting, I had our engineers do some prelinimary work on potential road locations for alternate solutions to the Aravaipa Canyon road problem. I presented our findings to the Pinal County Board of Supervisors and we have agreed that BLM will try to arrange funding for repair, reconstruction, and (some form of) surfacing of the road.

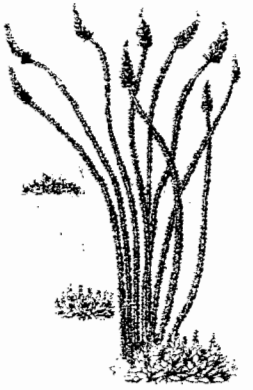
While we find that topography may provide an opportunity for an alternate road on the north side of the ridge, both the Board of Supervisors and I believe we will be most cost efficient if we use the present location.

Based upon this agreement, we are preparing a budget request to start the project. Most likely, our earliest funding will be in FY 1982. I will keep you and the Board advised of our progress.

Sincerely,

District Manager

cc: Arizona State Director (910)
Division of Technical Services (940)
Charles Guinn, Pinal Co. Bd. of Supervisors, Florence, AZ 85232
James Karan, " " " "
William Mathieson, " " " "
James Kerr, " " " "



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FAX MESSAGE COVER SHEET

TO: Steve Knox RMP Team Leader
COMPANY: Safford District BLM 425 E 4th St 85546
FAX#: (602) 428-4040 Ext 224

FROM: Frances W. WERNER
DATE: 4/6/90 TIME:
DESCRIPTION OF TRANSMISSION:
NO. OF PAGES INCLUDING COVER SHEET: 3
IF PROBLEMS OCCUR CALL: 325-7228 TUCSON

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SENT BY:A ; 4- 6-90 2:09PM ; 2763→ ;# 2

3216 N. Jackson Ave.
Tucson, Arizona 85719
April 4, 1990

Steve Knox, RMP Team Leader
Safford District Office
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

RE: Safford District Resource Management Plan - Environmental Impact Statement-Draft

I would like to support Alternative A (the preferred alternative as proposed in this document with the following comments.

Page 21 Management Concern 7 - vegetation

98-1 The statement is made, referencing the Fire Management Plan (in preparation, 1989), "wildfires will be put out". I am aware that since the Yellowstone Fire (1988) management direction has been given to agencies by those in authority at the Washington level, in part because of outcries from an ill-informed public. I would hope that the entire fire policy could be reassessed as fire historically has been very much a part of the natural processes of ecosystems. Philosophically it seems to me to be illogical to suppress fire in wilderness areas if these wilderness areas have been set aside to allow natural processes to occur. It is indicated (p. 22) that a "natural start" might be allowed if it is in an area that has been approved for a prescribed burn. I look forward to reviewing the proposed Fire Management Plan when it is released.

Page 23 Issue 1 - access

I would urge that the District Transportation Plan be developed within the immediate future. Access to the public domain lands is of increasing importance and concern to a number of citizens. Obtaining legal access for public and administrative use across private lands in 37 locations Districtwide and across other State and private lands as determined in the future should, in my opinion, be given the highest priority in District planning and funding. In effect, failure to obtain access creates de facto wilderness in many cases. Providing access is part of the Bureau's primary recreation role in providing dispersed and resource dependent types of outdoor recreation (Management Concern 3, page 19). I strongly support the Bureau's actions under this Issue.

Page 28 Issue 3 - off-highway vehicles

Item 1. I would like to support the proposal to designate the Hot Well Dunes area "Open" to off-highway vehicle use. This is an area that has historically been used for this type of recreation and, in my opinion, it is important to recognize that there is a growing segment of the population that enjoys the use of this area. Designating an area specifically for such use whould make it easier to close other areas to indiscriminate use.

Page 29 Issue 4 - riparian areas

98-2 Item 3. "Develop a riparian inventory system. Coordinate development and implementation of the system with other land managing agencies". You may be aware that as a result of Governor R. Moffard's Executive Order on Riparian Habitat (1989) there is now a Task Force made up of representatives of state agencies that is working to develop an inventory system. I would

urge that your office keep updated on the actions of this body as the proliferation of various "inventory systems" may not be in the best interests of expediting whatever protection may be warranted in this area.

Item 11. "Build Timber Draw Dam on the San Simon". I strongly support the implementation of this proposed action. I have first-hand knowledge of the value of the other structures that have been built by the Bureau along the San Simon and the rehabilitation of the lands along the River that has occurred. Soil erosion on the watershed has been diminished and wildlife habitat has been increased. I believe that the positive impacts of this action would far outweigh any negative impacts.

Page 29 Management Concern 1 - wildlife habitat
Item 2. "Inventory the District to determine the presence and abundance of priority species and their habitat". Would you consider adding language saying that this would be done in cooperation with Game and Fish? This language was included in Alternative D, Management Concern 1, #2, page 80. It would appear to be appropriate also for Alternative A. The same "cooperative" language might be considered also for #4, (page 30) which speaks to transplants of wildlife.

98-3

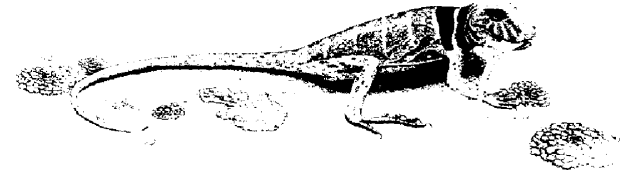
Page 31 Item 10. I would encourage the timely development of the Habitat Management Plans for the listed areas in cooperation with the Arizona Game and Fish Department. A close working relationship between the two agencies is vital for the BLM manages the habitat and the Game and Fish manages the wildlife. MUCH has been accomplished in habitat improvements state-wide in the past ten years as a result of the implementation of HMPs previously adopted. The development and implementation of new HMPs will continue the success stories.

Page 40 Management Concern 7 - vegetation
Item 3b. I am particularly interested in this proposal for it is in an area that historically has been neglected. The relationships of such creatures as harvester ants, grasshoppers, rodents and rabbits to the vegetation in their habitats is little understood because of lack of knowledge. I would suggest that consideration be given to working with the appropriate departments at the University of Arizona, the land-grant college, to develop graduate student projects that could provide needed base-line data.

A general comment - I believe that the approach taken in Alternative A in respect to ACECs and Wilderness expansion is appropriate. The continued expansion of "protected" areas is of increasing concern to a number of citizens who perceive the actions as an "elitist" movement. I firmly believe that the public WILL take care of their lands IF they are provided with information as to HOW to use them. The matter of educating the public in the wise use of the public domain and its resources is, in my opinion, one of the major issues facing us all.

I believe that Alternative A will fulfill the policy declaration of Section 102(8) Public Law 94-579 (1976). The Bureau has fulfilled its mandate to develop a plan, it is now the publics job to provide the political support to make sure that the funding and personnel are provided to the Bureau to implement the mandates of the plan.

Cordially,
Frances W. Werner
Frances W. Werner



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UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

3616 W. Thomas, Suite 6
Phoenix, Arizona 85019

2-21-88-F-114

April 5, 1990

MEMORANDUM

TO: District Manager, Bureau of Land Management, Safford. AZ

FROM: Field Supervisor

SUBJECT: Biological Opinion. Draft Safford District Resource Management Plan Impact Statement

This responds to your request of January 5, 1990, for formal consultation pursuant to Section 7 of the Endangered Species Act (Act) of 1973, as mended, on the draft "Safford District Resource Management Plan and Environmental Impact Statement" (RMP/EIS) for Bureau of Land Management (BLM) lands in Cocbise. Gila, Graham, Greenlee, Pima, and Pinal Counties, Arizona. Tbe species of concern are the spikedace (Meda fulgida), loach minnow (Tiaroga cobitis), Gila topminnow (Poeciliopsis occidentalis occidentalis). desert pupfish (Cyprinodon macularius), peregrine falcon (Falco peregrinus anatum), bald eagle (Haliaeetus leucocephalus), aplomado falcon (Falco femoralis septentrionalis), Sanborn's long-nosed bat (Leptonycteris sanborni). Cochise pincushion cactus (Coryphantha robbinsorum), and Arizona hedgehog cactus (Echinocereus triglochidiatus var. arizon 90-day consultation period began on January 8, 1990, the date your request was received in our office.

This biological opinion is based on infomation provided in the RMP/EIS, other infomation provided by the Safford District staff, data in our files, and other sources of infomation.

BIOLOGICAL OPINION

It is my biological opinion that implementation of the draft "Safford District Resource Management Plan and Environmental Impact Statement" is 1) not likely to affect the aplomado falcon; 2) not likely to jeopardize the continued existence of the Gila topminnow, desert pupfish, peregrine falcon. bald eagle, Sanborn's long-nosed bat. Cocbise pincushion cactus, or Arizona hedgehog cactus: and, 3) not likely to jeopardize the continued existence of the spikedace or loach minnow and not likely to adversely modify the proposed critical habitat of the spikedace or loach minnow.

BACKGROUND INFORMATION

Project Description

The proposed action is implementation by the BLM of the preferred alternative set forth in tbe Resource Management Plan for public lands of the Safford District in southeastern Arizona. The RMP/EIS provides overall

management guidance for administration of the District and makes specific land allocation decisions regarding identification of lands eligible for disposal, lands considered high priority for acquisition, designation of Areas of Critical Environmental Concern (ACEC's), and limitations on use of public lands by off-highway-vehicles (OHV's). The RMP/EIS also identifies which wildlife and plant species are to be considered as priority species in land management decisions. Decisions on allocation of resources for livestock grazing were not made in tbis document, with the exception of 6.521 acres of the San Pedro Riparian National Conservation Area (RNCA). Grazing decisions were made in two prior documents, the 1978 "Upper Gila San Simon Grazing Environmental Statement" and the 1981 "Eastern Arizona Grazing Environmental Impact Statement". Management of the existing Aravaipa Wilderness (1988) and the San Pedro RNCA (1989) was also addressed in prior documents

Species Description

The spikedace (Meda fulgida) was listed as a threatened species on July 1. 1986. Critical habitat was proposed on June 18, 1985, for portions of the Verde River and Aravaipa Creek in Arizona and the upper Gila River in New Mexico. The spikedace is a small, silvery a maximum size of about 2.5 inches (Minckley 1973) which inhabits the interface of fast and slow waters in shallow, flowing streams (Propst et al. 1986). Within the Safford District, the spikedace is presently found in Aravaipa and Eagle Creeks.

The loach minnow (Tiaroga cobitis) was listed as a threatened species on October 28. 1986. Critical habitat was proposed on June 18, 1985. for portions of the Gila, San Francisco, and Tularosa Rivers and Dry Blue Creek in New Mexico; and the Blue and San Francisco Rivers. Aravaipa and Campbell Blue Creeks in Arizona. Tbe loach minnow is bottom-dwelling inhabitant of fast rater areas (Propst et al. 1988). It is a slender, elongate fish reaching about 2.5 inches in length (Ninckley 1973). Within the Safford District, the loach m innow bas been documented only in Aravaipa Creek.

The Gila topminnow (Poeciliopsis occidentalis occidentalis) was listed as an endangered species on March 11, 1967. The Gila topminnow is a small, livebearing fish found in the Gila, Sonora. and del la Concepcion River drainages in Arizona, Ner Mexico, and Sonora, Mexico (Ninckley 1973, Vrijenhoek et al. 1985). Within the Safford District, the Gila topminnow has five extant reintroduced populations in Mescal Warm Springs, Cold Spring Seep, Big Spring, Watson Wash. and Martin Well.

The desert pupfish (Cyprinodon macularius) was listed as an endangered species on March 31, 1986. Critical habitat was designated at Quitobaquito Spring, Organ Pipe Cactus National Monument, Arizona and three locations in Imperial County. California. The desert pupfisb is a small fish historically c-n throughout much of the lower Gila River system,. the lover Colorado River system, and the Rio Sonoyta system in Arizona, California, and Mexico (Ninckley 1973). The Safford District has one reintroduced population of desert pupfish at Howard Well.

Rock ACEC, would benefit the species. Actions rbicb may adversely affect the peregrine falcon. such as vegetation manipulation, should be analyzed on an individual project basis to determine if effects would be adverse, neutral, or beneficial.

Protection of riparian areas and stream flows will, in general. have beneficial effects on the bald eagle. Continued grazing and allowance of OHV use in stream channels will negatively impact the bald eagle.

Sanborn's long-nosed bat would be Impacted by many of the actions proposed in the RMP/EIS due to the overall effects of the composition of the plant community. Actions such as livestock grazing and vegetation manipulation would be of particular concern for this species through depletion of food supply. Designation of ACEC's would have little impact on Sanborn's long-nosed bat due to management prescriptions which call for continued livestock grazing, vegetation manipulation, and some mining in many of the ACEC's. Establishment of an ACEC at Bat Cave on Eagle Creek may benefit some other bat species. but that cave is not known to be used by Sanhorn's long-nosed bat.

The proposed BLM acquisition of State lands west of Guadalupe Canyon would have a beneficial effect on the Cochise pincushion cactus. Because this cactus is not currently known from BLM lands. no other actions in the RMP/EIS would impact the species until and if the State lands on which it occurs are acquired. time. such actions as grazing, vegetation manipulation, mineral development. OHV access, etc., may be of concern.

Little effect is expected to the Arizona hedgehog cactus from actions and policies proposed in the RMP/EIS.

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 Fish and Wildlife Service (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. The following constitute FWS conservation recommendations:

1. Private lands along Eagle Creek should be identified as high priority areas for BLM acquisition.

2. We recommend adoption of the alternative B, Aravaipa Watershed ACEC boundaries. as a part of the preferred alternative.

3. The exclusion of grazing, closure to withdrawal from mineral and sales. and acquisition of private and State inholdings should in the management prescription for the Aravaipa Watershed ACEC.

4. If BLM does not already hold water rights, an attempt should be made to obtain them for Mescal Warm Springs, Martin Well, and Howard Well.

5. Public lands being considered for disposal should be analyzed for their value as fwd source for Sanborn's long-nosed bat and those with significant stands of agave or saguaro should be retained in public ownership or exchanged for other lands with similar value for the bat.

6. Any gating of caves should be done with bat-sensitive techniques to allow for full access to the caves for Sanborn's long-nosed bat and candidate bat species.

7. Plans for vegetation manipulation and treatment should be carefully analyzed for their effects, both direct and indirect, on listed species, and plans modified to eliminate any adverse effects.

INCIDENTAL TAKE

Section 9 of the Act prohibits any taking (harass, harm, pursue, bunt, shoot, round, kill, trap, capture or collect, or attempt to engage in any such conduct) of listed species without a special exemption. Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering. Under the terns of Sections 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 bounds of the Act provided that such taking is with the incidental take statement.

No take of spikedace, loach minnow, Gila topminnow, desert pupfisb, peregrine falcon, bald eagle, Sanborn's long-nosed bat, Cochise pincushion cactus, or Arizona hedgehog cactus is expected to occur as a result of general implementation of the incidental take of several of these species may occur as a result of various site-specific actions taken under the the RMP/EIS. Any action taken under this RMP/EIS that is expected to have any effect (beneficial or otherwise) on a federally listed species must undergo additional Section 7 consultation. At that time the potential for incidental take from such actions will be addressed.

In order for the FWS to be kept informed of actions that either minimize or avoid adverse effects or benefit listed species or their habitats, the FWS is requesting notification of the implementation of any conservation recommendations.

The peregrine falcon (Falco peregrinus anatum) was listed as an endangered species on October 13, 1970. It is a medium-sized, blue-gray falcon which inhabits rocky, steep cliffs, preferably near water. Documented nesting sites of peregrine falcon are found within or near the Safford District at Eagle Creek. Dos Cabezas Mountains, Galiuro Mountains. Pinaleno Mountains, Black Rock area., and Aravaipa Creek. Good peregrine falcon habitat also exists in the Mescal and Peloncillo Mountains and the Gila Box, although peregrine nests have not yet been found in those areas. The Willcox Playa area also provides excellent foraging area for migrating peregrine falcons.

The bald eagle (Haliaeetus leucocephalus) was listed as an endangered species on larch 11. 1967. This large. primarily fish-eating raptor is found in the southwest as two distinct populations, those which nest in the southwest and those which only winter in the southwest (USFWS 1982). An occupied bald eagle nest is located just below Coolidge Dam and the territory of that pair includes portions of the Safford District. Wintering bald eagles are known from several areas on the Safford District, most notably the Gila River in the Gila Box and below Coolidge Dam and along the San Francisco River.

The aplomado falcon (Falco femoralis septentrionalis) was listed as an endangered species on February 26., 1986. Although there • ay be potential reintroduction habitat for the aplomado falcon in southeastern Arizona, it is not presently known to occur there.

Sanborn's long-nosed bat (Leptonycteris sanborni) was listed as an endangered species on September 30, 1980. This bat feeds primarily on nectar from agave and saguaro blossoms. It winters south of the U.S. border and migrates into tbe United States in the spring and summer. No maternity colonies are Mom in the Safford District, but Sanborn's long-nosed bat has been recorded in several portions of southeastern Arizona, including the Mammoth, Muleshoe, Port Huachuca, San Pedro River. Paradise/Portal, Port Bowie, San Simon, and southern Pinaleno Mountains areas (Cockrum, In press). While roosting sites are most likely at higher elevations, much of the foraging habitat is located on lands of the Safford District.

The Cochise pincushion cactus (Coryphantha robbinsorum) was listed as a threatened species on January 9, 1986. A small, unbranched cactus, the Cochise pincushion cactus grows on gray limestone in the Semidesert Grassland at an elevation of about 4,200 feet (Benson 1982). It is not presently known from lands of the Safford District, but is found on State lands identified for BLM acquisition in the area east of Douglas.

The Arizona hedgehog cactus (Echinocereus triglochidiatus var. arizonicus) was listed as an endangered species on October 25, 1979. A dark green, single or multiple stemmed cactus growing 2.5 to 12 inches tall, the Arizona hedgehog cactus inhabits open slopes in the understory of shrubs of

the Madrean Evergreen Woodland/Interior Chaparral ecotone at 3,800 to 5,200 feet elevation (Rutman 1990). Populations of this cactus are known to occur vithin the Safford District in the Mescal Mountains.

IMPACTS OF THE ACTION

Environmental Baseline

The Safford District has many ongoing management activities including livestock grazing, mining, recreation, road construction and maintenance, wildlife management, water developments, vegetation manipulation, etc. These activities have resulted in various adverse and beneficial effects to federally listed species and together with *other* human activities in southeastern Arizona have contributed to the present threatened or endangered status of the species of concern in this opinion. General guidance concerning management of most categories of BLM management actions are addressed in tbe RMP/EIS. Management of the San Pedro RNCA, of most grazing in the District, and of the Aravaipa Wilderness will not change from the ongoing management as set forth by the existing documents listed earlier in this opinion.

Direct and Indirect Effects of the Proposed Action

Land use decisions and changes in management as a result of the implementation of the preferred alternative of the RMP/EIS will affect the nine federally listed species known to occur vithin the Safford District.

The spikedace and loach minnow will be similarly impacted by tbe RMP/EIS. While certain provisions of the RMP/EIS will effect potential recovery habitats for these two fisb, that is not within the scope of the Section 7 consultation process. Effects addressed in this biological opinion are limited to those which will affect the continued survival of the existing populations. On Aravaipa Creek the designation of an ACEC on Turkey Creek may have some positive effects; however, those effects would be limited by the small geographic scope of that ACEC and the continued grazing of the ACEC. Acquisition of State and private lands in the vicinity of Eagle and Aravaipa Creeks would probably result in overall beneficial affects to the spikedace and loach minnow as would various protections proposed for all riparian areas.

As ritb the loach minnow and spikedace, the Gila topminnow and desert pupfish will be addressed in this biological opinion only in regards to their existing populations. Continued livestock grazing and livestock and rildlife water developments would exert some adverse affects upon these two fish while the various protections proposed for all riparian areas would result in beneficial i-pacts.

The peregrine falcon would be impacted by various actions proposed in the RMP/EIS including OHV regulations, ACEC designation. and vegetation manipulation. Certain proposed actions. such as designation of the Black

This concludes formal consultation on this action. Reinitiation of formal consultation is required if the amount or extent of incidental take is exceeded. if new information reveals effects of the action that may impact listed species or critical habitat in a manner or to an extent not considered in this opinion, if the 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 if a new species is listed or critical habitat designated that may be affected by tbe action.

It we can be of further assistance, please contact Sally Stefferud or me (Telephone: 602/379-4720 or FTS 261-4720).

Sam F. Spiller

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

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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 5, 1990

MEMORANDUM

TO: District Manager, Bureau of Land Management, Safford, Arizona

FROM: Field Supervisor

SUBJECT: Review of Draft Safford District Resource Management Pla" and Environmental Impact Statement

1" response to your January 5. 1990 request. the Fish and Wildlife Service (FWS) has reviewed the draft "Safford District Resource Management Plan and Environmental Impact Statement" (RMP/EIS). This memorandum contains our general comments and review of overall wildlife concerns. The biological opinion which will conclude formal Section 7 consultation on the RMP/EIS will he sent under separate cover.

GENERAL COMMENTS

Land Exchanges

The FWS is strongly supportive of the Bureau of Land Management's (BLM's) land exchange efforts and believe that BLM acquisition of State lands in the Turkey Creek, Muleshoe, Babocomari River. and Guadalupe Canyon areas will he of great value in the protection and enhancement of wildlife and plant resources, including recovery of threatened and endangered species. In addition to those areas identified i" the preferred alternative. we suggest that State lands also be considered on the rest slope of the Santa Teresa Mountains to provide protection for the Aravaipa watershed and to join Aravaipa Creek BLM lands to the Santa Teresa Mountains and BLM lands beyond to form a large contiguous area of federally owned lands. Large contiguous areas. especially those combining lowland and mountain areas. tend to maintain a higher diversity of species and provide a greater degree of protection for ecosystems.

100-1

The RMP/EIS does not identify which private lands are to be acquired. Although we realize that specific parcels cannot be identified due to the need to find willing sellers or exchangers, we believe the RMP/EIS should identify areas in which such acquisition is considered desirable. For example, we recommend that under the stated objective of acquiring privately owned riparian lands within or adjacent to public lands, the following private lands be identified as high priority: inholdings in the San Pedro Riparian National Conservation Area (RNCA), lands between the Palominas portion of the RNCA and the downstream portion, lands along the Babocomari River, lands along the lover San Pedro River, and lands along Eagle Creek.

100-2

One minor question arises concerning the lands identified for disposal. I" T.13S., R.19E., Sec. 30 there are two lots (3 and 4) identified for disposal. A spring identified as potential Gila topminnow reintroduction habitat and included in the draft proposed rule for designation of experimental nonessential populations of that species is also located in T.13S., R.19E., Sec. 30. Our maps are not of sufficient scale to determine if the spring is on lands identified for disposal. If it is and is not deemed sufficiently valuable as reintroduction habitat, we would appreciate prompt notification so that it can be removed fra the draft proposed rule prior to publication.

100-3

1978 and 1987 Grazing Environmental Impact Statements

We believe the decision to exclude analysis of grazing as a" issue in the RMP/EIS is a serious flaw in this document. The majority of tbe grazing lands in the Safford District (District) were addressed in the 1978 "Upper Gila-San Simon Grazing Environmental Impact Statement" (Upper Gila EIS), which we believe is out of date and in need of review. This RMP/EIS may be the most effective place to update the grazing analysis and allow the District's master land use allocation decisions to be made with consideration of all major land use issues instead of excluding consideration of the single most pervasive land use.

Many things have changed since 1978; in particular, the District has acquired over 250.000 acres of additional lands and disposed of a similar amount. Alterations in grazing management due to the acquisitions and disposals need to be addressed. The 1987 "Eastern Arizona Grazing Environmental Impact Statement" may address some of those lands; however. since that document has no maps shoving specific areas being analyzed and refers to the areas by allotment number only, it is impossible to discern which of the new lands are addressed. Since 1978, several species found in or "ear the District have been added to the Federal list of threatened and endangered species, including Cochise pincushion cactus, Arizona hedgehog cactus, spikedace. loach minnow, Sanborn's long-nosed bat. and desert pupfish. In addition, the 1978 Upper Gila EIS shows that 91 percent of the range in the area of consideration was in fair to poor condition at the time of that document. The RMP/EIS reports only 63 percent of the range to be in fair to poor condition attributing this large increase in condition to reductions in livestock numbers, better livestock management, and increased rainfall. Thus, the Upper Gila EIS would appear to be out of date and inadequate for use as a baseline for master land use allocation decisions a" other resources.

100-4

We believe that balancing of all competing land uses. which is the purpose of a" RMP, cannot be accomplished if the allocation of resources for one land use were made prior to the RMP. Use of prior decisions on a single land use as the baseline for allocation of remaining resources to other land uses in a biased decision.

Priority Species

100-5 Each alternative in the RMP/EIS has a different list of species which will be considered to he priority species, and priority species are delineated only for animals. We recommend that all of the species listed on Tables 3-2 (pages 137 and 138) and 146), plus any species on the District which in the future become State or Federal threatened, endangered or candidate species, be adopted as priority species for the preferred alternative under both the wildlife and vegetation management concerns. This would be in keeping with BLM policy regarding listed and candidate species (BLM Manual Section 1622).

Riparian Areas

100-6 We support the emphasis which the RMP/EIS places an protection of riparian areas, their retention in public ownership, and their withdrawal from mineral entry. The goal of 75 percent of riparian areas in good or better ecological condition by 1997 is commendable. It would be helpful if information was furnished in the plan on percentages of riparian in each condition class at the present time. We also ask for clarification of what portion of the riparian resource of the District will be included in this protection. The RMP/EIS simply says "riparian" and refers the reader to map 34. Map 34 delineates the major riparian areas on stream courses. However, much of the riparian resource in the District is found in very small pockets around springs, seeps. and small perennial waters in otherwise ephemeral streamcourses. These small riparian areas are not shorn on map 34 and it should be made clear in the RMP/EIS whether they are included in the "riparian" which is recommended for retention and withdrawal from mineral entry.

100-7 We discussions of riparian areas be extended to also address the aquatic habitats which are interdependent with riparian habitats. Management of these two habitat types must be integrated in order to optimize protection and enhancement of each. Optimum management for one type will not necessarily result in optimum management far the other, and single-minded pursuit of riparian management without consideration of the aquatic habitat may result in damage to and loss of opportunity for aquatic habitats.

Grazing in the San Pedro Riparian National Conservation Area

100-8 We strongly object to continued grazing on the 6.521 acres of land which are part of the San Pedro Riparian National Conservation Area (RNCA), but which were not addressed in the San Pedro River Riparian Management Plan. We believe that grazing is not compatible with the congressionally mandated purpose of the RNCA. A portion of these lands lie along the Babocomari River and should be considered an integral part of the riparian lands which

100-a BLM is mandated to protect and restore under the RNCA. That protection and restoration cannot be fully realized in the presence of livestock grazing. Upland areas on the east side of the river are less vital to the overall purpose of the RNCA, but their removal from grazing would facilitate management of the RNCA and contribute valuable information about the impacts to the riparian area from protection of upland areas of the watershed. Such information would contribute greatly to the analysis of the pros and cons of grazing in the RNCA that will occur at the end of the 15 year grazing moratorium. We understand that grazing rights on these former State lands were guaranteed for the life of the existing leases as part of the exchange agreement with the State of Arizona. However. we recommend that the RMP/EIS stipulate that livestock grazing will be terminated at the expiration of the current leases. In addition, we recommend that the interim protective fencing far the Babocomari River riparian zone presently being considered by the District be added to the RMP/EIS as an action item of the preferred alternative.

Areas of Critical Environmental Concern (ACEC)

100-9 We commend BLM an the recommendation of 17 areas for ACEC designation. and recommend the following boundary changes. Because of their outstanding wildlife resources and their importance to preservation and recovery of threatened and endangered species, we recommend that the expanded boundaries set forth in alternative B be adopted for the Bonita Creek, Gila Box, Aravaipa Watershed, and Guadalupe Canyon ACEC's. We also recommend that the Swamp Springs-Hot Springs Watershed ACEC be expanded slightly to include all BLM owned areas within the Bass Canyon watershed. These additions would increase the amount of land to be designated as ACEC's to about 7 percent of the total BLM lands in the District: a relatively small allocation. Existing literature indicates that larger contiguous areas are generally more effective at than small isolated areas. In addition, the surrounding watershed is vital in the protection of aquatic and riparian resources and many impacts cannot be alleviated without protection of the watershed as well as the stream bottoms. For example, although the bottomlands of Aravaipa Creek have been protected for many years, the uplands are still subjected to multiple use practices and according to the Aravaipa Wilderness Management Plan have been heavily impacted by livestock grazing with vegetative condition in the side canyons cited as poor. As a result, uplands are still contributing sediment and water quality impacts to the stream and are in need of ❑ anageoeent to alleviate grazing impacts.

100-10 We changes in the management prescriptions recommended for the ACEC's. Under all alternatives, the majority of the ACEC's would remain open for *grazing*, mining. and off-highway vehicle (OHV) use. The definition of an ACEC states that their purpose is to provide special management to protect outstanding natural values. If all the same land uses are allowed as would be the case without ACEC designation, there

appears to be no purpose in the designation of ACEC's. In particular, we recommend that management prescriptions for the Bonita Creek. Aravaipa Watershed (including Turkey Creek and Table Mountain), and Swamp Springs/Hot Springs ACEC's specify no grazing. closure to OHV use, withdrawal from mineral entry, leasing and sales, and acquisition of private inholdings. We also recorend that the alternative B Gila Box ACEC management prescription recommending closure of the canyon bottom to OHV use, be brought forward into the preferred alternative: and that installation of a gate to *exclude* humans while still allowing free bat access be included in the management Prescription for the Eagle Creek Bat cave ACEC.

100-11 The RMP/EIS states that for ACEC's which are part of wilderness Study areas, their designation as wilderness would result in removal of ACEC status. We recommend retention of ACEC status even if the area is placed into wilderness. Designation as an ACEC allows more flexibility in management, and we believe the dual Status will help provide maximum protection to these areas.

Wild and Scenic Rivers

Of tbe areas Studied for Wild and Scenic River designation, we believe the single area recommended for designation in the preferred alternative is the least wild and scenic. Rationale far exclusion of the Gila River segment below Coolidge Dam is set out in the RMP/EIS, but no rationale is included for the exclusion of any portions of the Gila Box and San Francisco River. Lacking that rationale, it is difficult to understand why this outstanding example of the few free-flowing river segments left in Arizona should be judged not suitable for Wild and scenic designation. We recorend that conclusions reached in the Wild and Scenic River Report (appendix 5) regarding the Gila Box be adopted as part of the preferred alternative: with 17.95 miles of Wild designation on the Gila and San Francisco Rivers, 10.85 miles of scenic designation on the Gila River, and 4.95 miles of Recreation designation on the Gila River. Ye believe that designation would be beneficial to wildlife and threatened and endangered species in the Gila and San Francisco Rivers.

Unique Waters

Ye support your plan to evaluate several District streams for designation as Unique Waters. We believe such designation will help to protect those streams and their high value natural resources. The RMP/EIS indicates that Bonita Creek also qualifies for consideration for Unique Water designation. We recorend that Bonita Creek be identified under the preferred alternative for nomination for designation as a Unique later.

Water Rights

The RMP/EIS identifies eight perennial waters which BLM will evaluate as to their potential for BLM acquisition of State rater rights. We support this effort and recommend that many of the isolated Springs and Short perennial stretches in ephemeral stream channels be added to the list of sites to be evaluated.

Vegetation Manipulation

100-12 Land treatment and vegetation manipulation are listed as anticipated actions under all alternatives in the RMP/EIS. We recommend that the RMP/EIS specify that such treatment and manipulation will not occur in habitat for endangered. threatened. or candidate species, Such as Arizona hedgehog cactus, Sanborn's long-nosed bat, and desert tortoise. We also suggest that most types of vegetation treatment, such as prescribed burning and herbicides, be excluded from use in riparian zones.

Transplanting, Augmentation, and Reintroduction of Species

100-13 At several places in the RMP/EIS references are made to the potential for transplanting, augmenting, and reintroducing flora and fauna. The only specific reintroductions that are addressed are for woundfin and aplomado falcon. We would also like to see specific statements regarding the potential for reintroduction of other native Species into the District. In particular. the San Pedro RNCA Should be specifically identified as among the best remaining reintroduction habitat for several federally listed and other native species including the spikedace, loach minnow. roundtail chub, desert pupfish, Sonora sucker, and possibly the razorback Sucker. Gila topminnow, and Colorado squawfish. In addition. we recorend that the RMP/EIS include reintroduction of beaver into the San Pedro River as a major component of the historic native ecosystem of that river. recognizing that Such reintroduction would require management control. Bonita Creek should be identified as a potential reintroduction site for spikedace. loach minnow, razorback sucker, Gila topminnow, and beaver; and the Gila River upstream from Safford in the Gila Box area should also be identified as a potential native fish reintroduction area. Many of the isolated springs and Seeps in the District have been identified elsewhere as potential Gila topminnow and desert pupfish reintroduction sites. These need not be listed individually in the RMP/EIS, but reference to their identification should be included.

Non-native Species

Transplants and augmentation of Son-native species, both animal and plant, should be discouraged. All references in the RMP/EIS to transplants or augmentations should specify that it refers only to native species. The problem of non-native species and their adverse impacts on native species

100-14 is one of serious concern to the natural resources of the District. Introduction and invasion of non-native species have resulted in many adverse impacts to native species of the district, particularly native plants and fish. We would like to see the RMP/EIS recognize this problem and address at least general policy on bow the District intends to deal with it. We recommend that both the wildlife and vegetation portions of the RMP/EIS state that, in general. no non-native species will be transplanted. augmented, or seeded onto District lands. Although there are some circumstances in which that policy would not be applicable. those cases should be subject to careful scrutiny and coordination with the Arizona Game and Fish Department, FWS, and other appropriate parties.

100-15 In addition, we recommend that the RMP/EIS specifically call for construction of a barrier to upstream movement of non-native fish below the mouth of the canyon at Aravaipa Creek. Interagency efforts have been underway for some time to establish baseline information and to obtain funding far construction of such a harrier. Recognition of the need for this barrier in this plan would make clear the District's support for the project. Aravaipa Creek is one of the "jewels" of the District and the presence of the relatively intact native fish fauna is a major portion of the value of the area. To protect that fauna it will be necessary to prevent invasion of the creek by many of the "an-native fishes that are presently found in the lower San Pedro River.

Comparison of Alternatives

While alternatives A. B, and C are directly comparable, it is not possible to compare those alternatives with the no action alternative D. Alternatives A, B, and C are defined through conceptual approaches and broad-framed policies; specific action items apply only to major land allocation decisions such as lands far exchange and areas recommended for Wilderness, ACEC, or Wild and Scenic River *tat"*. Alternative D is defined through site specific action items. We recommend that Alternative D be rewritten to define the alternative "sing the same approach as was used for alternatives A, B, and C.

SPECIFIC COMMENTS

100-17 page 2. Issue 2. It is be confusing that the RMP/EIS refers to the Galiuro Wilderness without reference to the fact that it is on the Coronado National Forest and not an BLM land.

100-18 page 4. column 1, para. 4. It would be helpful to define here the difference between an issue and a management concern and whether that difference will give different end results during implementation of the RMP/EIS.

100-19 page 6, column 1, para. 2. and column 2, para. 4. We believe the references to "resource conservation areas" were actually intended to refer to research natural areas. If not. then the definition of a resource conservation area should be included in the glossary and reference should be made under the various alternatives as to what decisions were made regarding the designation of resource conservation areas.

00-20 page 7, column 2. para 6, and page 10, para. 3. Federal candidate species should also be considered for setting of management objectives. Another question to be asked efforts can be tailored to fulfill objectives of existing recovery plans for federally listed species.

100-21 page 9, column 2. Management Concern 6. "bat objectives should BLM establish for management of soils in other areas of special concern such as the San Pedro RNCA and the Aravaipa Creek watershed?

00-22 page 15. Alternative Formulation. The criteria for alternative formulation should also state that each alternative will provide for grazing as delineated in the two existing grazing EIS's and each will provide for mining pursuant to Mining Act. These are both baseline conditions of the RMP/EIS.

100-23 page 16, column 2, para. 1. This paragraph should also recognize the need for additional Section 7 consultation on specific actions.

100-24 page 30, column 3. Does the phrase "taking into consideration climatic changes" Indicate that data documenting a climatic change i" southeastern Arizona in the past 100 years?

100-25 page 30, column 2, item 4. This item should specify that transplant and augmentation of priority and other wildlife species should occur only within the historic range of the species being transplanted.

100- 26) page 30, column 2. item 7. Rationale for protection of springs and associated vegetation should also include the protection and enhancement of indigenous flora and fauna. Too often in the past, protection of springs for wildlife and livestock water has resulted in destruction of habitat for indigenous wildlife and plants.

100- 27 column 1, items 11 and 12. These items should also be accompanied by additional items providing far input into allotment management plans to ensure that opportunities are maximized for protection and recovery of all priority wildlife and threatened. endangered, and candidate plants. and to provide for sufficient quantity and quality of forage for desert tortoise.

100-28 page 31, column 1, item 13. Section 7 consultation will be required on all animal damage control activities that may affect Federal endangered and threatened species.

100-29 page 31, column 2. Management Concern 2. An additional action should be specified calling for evaluation of all lands, prior to disposal. for presence of candidate. threatened. or endangered wildlife and plants.

100-30 page 31. column 2 and page 32. column 1, Management Concern 2. We recommend that map 35 he amended to show the location Of all lands identified for disposal and to more specifically show the State lands listed on page 32 as high priority areas for acquisition.

100-31 page 33, column 2. Management Concern 3. Please define the term "Special Recreation Management Areas" and specify what special management such a designation would invoke.

100-32 page 34, column 1, item 5. What are the public safety hazards located on the Gila River from Coolidge Dam to two miles upstream from Dripping Springs Wash that justify a float-boating prohibition?

100-33 page 40, column 2. paragraph 2. Vauquelinia pauciflora is not a federally listed species. it is a federal category 2 candidate. It has also undergone taxonomic revision and should now be referred to as Vauquelinia californica ssp. pauciflora. Aster lemmonii is spelled ritb two m's and has now been determined not be a valid taxon. As a result. it is longer a category 1 candidate. but has been moved to category 3B. Rumex orthoneurus is unlikely to exist on BLM lands in the District. It is a high elevation species, found above 7,000 feet in ret areas.

100-34 page 44. Table 2-8. The third column is missing a portion of its title. We believe the title should correctly read "values and Hazards".

100-35 page 81. column 2. item 24. Please add the San Pedro River and Bonita Creek to the areas to be studied for reintroduction of beaver, subject to management control capabilities.

100-36 page 83, column 1, items 14 and 15. These two items are found only in alternative D. Does this mean that the withdrawals outlined in item 14 and the withdrawal revocation outlined in item 15 would not occur under any of the other alternatives7

100-37 page 86, column 1. Management Concern 7. item 4. Alternative D calls far review and revision of all existing allotment management plans. Ye recommend that this charge also be incorporated into the preferred alternative.

100-38 page 127, column 2. para. 4. The Timber Draw Detention Dam is not addressed in the Upper Gila-San Simon Grazing EIS. That EIS addresses only the Barrier. Tanque, and Slick Rock detention dams.

100 -39 page 131, Table 3-l. The Table Mountain Mining District was cited in the RMF/EIS as having an estimated value of $22.2 million. In Scott (1988), "Mineral Resources of the Aravaipa Study Area" that Mining District is said to have an estimated value of only about $0.5 million. Scott concludes that the Table Mountain Mining District is subeconomic for development of mineral resources.

100-40 page 135, column 1, para. 2. The list of riparian dependent species should also include the lowland leopard frog.

100-41 page 135, column 2, para. 4. Bat roosts include more than maternity colonies. The FWS requests that all known bat roosts be protected on BLM lands.

100-42 pages 137 and 138, Table 3-2.

Three federal candidate species were omitted and should be added to this table as known District occurrences with breeding populations:

Bylas springsnail (Apachecoccus arizonae), category 2
Gila tryonia snail (Tryonia gilae), category 2
Arizona grasshopper sparrow (Ammodramus savannarum ammolegus), category 2

- The thick-billed parrot is not listed as endangered in the United States. Only those populations found in Mexico are federally listed. The-united States population has no official status under the Endangered species Act.

100-43 page 146, Table 3-3.

Night blooming cereus (Cereus greggii) has been moved to category 3C.

Cochise pincushion cactus (Coryphantha robbingorum) is not currently found on BLM land but is on the State lands west of Guadalupe Canyon that are identified for BLM acquisition.

- Acuna cactus (Echinomastus erectocentrus var. acunensis) should be added to the table as a possible occurrence in the District. Acuna cactus is a category 1 federal candidate.

The Lemmon fleabane (Erigeron lemmonii) found at Turkey Creek has been submerged within a more c-n species, (Erigeron piscaticus).

100-43 The species and subspecies for the needle-spined pineapple cactus are misspelled and incorrectly cited. In addition the scientific name has been changed to Echinomastus erectocentrus var. erectocentrus.

Rosewood, also known as limestone Arizona rosewood, has been subsumed into another species as a subspecies. The correct name is now ssp. pauciflora.

100-44 page 159, column 1, Assumptions. Add the assumption that inventories for threatened, endangered, and candidate species will occur on areas of proposed land uses.

100-45 page 166, column 1, para. 2. Please specify what nine locations proposed for disposal under alternative C would result in low impacts to desert tortoise and Gila topminnow.

100-46 page 187, item 1. Bonita Creek also provides reintroduction habitat for the threatened spikedace and loach minnow and the endangered Gila topminnow.

100-47 page 232, column 2, para. 4. The loach minnow is not known to be present in the study area; however, W.L. Minckley in the 1919 "Resource Inventory for the Gila River Complex in Eastern Arizona" states tbat he believes that loach minnow may still be present in the area. although they were not found during sampling. Loach minnow is an elusive species and further survey of the Gila Box should be carried out

100-48 page 247, column 1, item i. This objective should be limited to native wildlife only.

100-49 page 247. column 1. We recommend that two other primary objectives be added: Protect native fish and wildlife by exclusion or removal of non-native species which may adversely affect natives. And, protect and restore springs and seeps and their native flora and fauna.

100-50 page 247. column 2. para. 2. The Mexican garter snake was still found on the San Pedro River in 1986.

If we can be of further assistance, please contact Sally Stefferud or me (Telephone: 602/379-4720 or FTS 261-4720).

Sam F. Spiller

Sam F. Spiller

cc: Regional Director. Fish and Wildlife Service, Albuquerque, New Mexico (FWE/HC)

101

Rio Linda Ca
5 April 1990

Bureau Land Mgt.
Mr Steve Knox
Dear Sir.

In receipt of your recent publication on the "Environmental Impact Stmt". I have thoroughly reviewed its contents and maps and find you work very detailed and pertinent and concise. I will watch with interest your further applications of these sources and have input from time to time on their progress.

My contact with Safford B.L.M. has been both informative and information with co-operation

Sincerely
Margaret E. Gasser
6637 Berman St
Rio Linda Ca
95673

102

ARIZONA WHITEWATER EXPEDITIONS

26028
Tempe, AZ. 85282
(602) 838-7428

April 5, 1990

TO: Mr. Steve Knox
SUBJECT: Safford District Resource Management Plan

102-1 The preferred alternative recommended by the BLM short- changes the natural attributes and environment of the district. While recommending the Lower Gila, below Coolidge Dam, as a suitable "Wild & Scenic River?, the BLM recommends against study of the free-flowing segment of the Gila River in Arizona the Gila Box. We insist that both segments meet all criteria as' Wild & Scenic Study Rivers and that other streams neglected in this draft plan(ie. San Pedro, Aravaipa,etc.) be included in the Final Plan.
In light of the imminent designation of the Gila Box as a National Conservation Area, we feel it would be negligent of the BLM to not consider this segment of river far Wild & Scenic protection. The Safford District has some of the best remaining riparian areas in Arizona and we wish to work with the District to fully protect these irreplaceable resources.

Sincerely,
Jerry Van Gasse
Jerry Van Gasse

103

WEA INC.
WHOLE EARTH ADVENTURES
P.O. Winkelman, Arizona 85292
(602) 899-6594

April 6, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Steve:

This letter is Whole Earth Adventures, Inc. (WEA) response to the Bureau of Land Management's (BLM) Resource Management Plan and Enviormental Impact Statement (RMP/EIS) of January 1990 #1610.

Our comments are based on the following facts:

1. WEA will not just be a river rafting company but will be a complete outdoor recreation company that in the future will offer river rafting, canoeing, kayaking, and inflatable kayak guided trips along with a river rental service that will rent river equipment to private river users. This rental equipment will consist of rafts, canoes, kayaks, inflatable kayaks, life jackets, throw bags, etc. WEA will also offer mountain and touring bicycling, horse and pack trips, back packing and hiking opportunities along with a complete experienced guide service.
2. All of the above mentioned activities will be supported by a 23 acre base camp in the Dripping Spring* area which will provide showers. sanitation facilities, camping, RV camping, food service, and other recreation facilities.
3. WEA is an environmentally and culturally aware company. Berger and Associates, a Phoenix based company. has recently completed a 32 page technical proposal to perform an intensive archaeological survey on our 23 acre base camp property which will result in the formulation of a plan to protect. explore, and develop 4 archaeological sites located on the property into small interpretive sites and/or visitors and guests can enjoy. All work c o Interior's Standards for Archaeology and Historic Preservation (48CFR44716).
4. WEA is a locally owned and operated company and will employ local people, when possible; support local businesses and government; and pay local property, school. and sales taxes.
5. WEA is an experienced outdoor recreation company having been located in West Virginia where commercial trips were operated on the New, Gauley, and Meadow Rivers for over 8 years.

With the above facts in mind, we wish to submit our evaluations on the proposed RMP/EIS.

1. WEA agrees with Alternative A, Issue 1, #6, part 31. The Gila River Road below Coolidge Dam should be acquired to provide access to the Gila River. As an experienced outfitter, WEA is aware of the necessity for quick, safe, and convenient access to river "put in" points.
2. WEA strongly disagrees with Alternative A, Issue 2,#4 but strongly supports Alternative B, Issue 2, #4, part C. WEA assumes this position as Alternative B would protect the Gila River below Coolidge Dam for the entire length of Segments 2, 3, and 4 from future developments of hydroelectric power facilities and new flood control structures. Alternative A merely protects Segment 4.
3. WEA opposes Alternative A and B, Issue 3, #6 not on the grounds that mountain bikes would be denied access to certain "Closed" or "Limited" area but on the grounds that all mechanized or motorized transportation could be denied access. As this is written, this would seem to include wheel chairs. WEA supports the right of all people to enjoy outdoor-recreation. 103-1
4. WEA strongly opposes Alternatives A and B, Management concern 3, reasons.
   a. No river in the world is safe. If is only through the knowledge, training. and experience of professional river outfitters that the chance of accidents. injuries, and other problems inherent in river trips can be minimized.
   b. Private boaters and tubers have run this section of the Gila before and will continue to do so regardless of what any Federal agency says.
   c. This section of the Gila can be cleared and shrubs just a* Segments 4 and 5 have been cleared. 103-2
   d. The remotness of Mountains would n o t significantly contribute co the hazardous nature of this section of the Gila if two way communication via radio-telephone would be used. This system currently operates in a satisfactory manner on the Gauley in West Virgina and the Salmon in Idaho.
   e. The economic impact of not allowing commercial river trips on this section of the probably reduce the number of river related jobs that WEA could offer the local community from about 30 to 35 part time

jobs to 17 to 20 and the number of full time jobs from 45 to 50 down to 30 to 35. This, WEA believes, would have a significant economic impact on the local area as opposed BLM statements on page 242, #5, paragraph 2, liner 8, 9, and 10.

5. WEA supports Alternative A, Management Concern 3, #9 especially on the access points to the Gila in Segment 4. At the present time these access points from HWY. 77 are designated by various means ranging from red rag flags, survey marking tap, hand made signs, etc. Not only is this a significant visual intrusion but contributes to unsafe auto traffic conditions. Also signs at the river "put in" points would prevent campers and river users from experiencing disagreements as the right to access.
6. WEA supports Alternative A, Management concern 5 over Alternatives B, C, or D because of historical. environmental and cultural prejudices.

We at WEA appreciate the opportunity to particiapate in this planning process and hope that our comments are useful and informative.

Truly,

Richard M. Hanley

Richard Hanley, President

104

April 6. 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E.
Safford, AZ 85546

Dear Steve:

This letter is Gila River Tours. response to the Bureau of Land Management's (BLM) Resource Management Plan and Environmental Impact statement (RMP/EIS)

Our comments are based on the following facts:

1. GRT will be a professional river company providing guided river rafting, kayaking, and canoeing trips on the Gila river. River Trips and tours will be our only business.
2. GRT is an experienced professional river company having performed commercial river trips in West Virginia on the New (Class and Meadow Rivers for over 8 years.

With the above facts in mind, we wish to submit our evaluations on the proposed RMP/EIS.

1. GRT agrees with Alternative A, Issue 1, #6, part 31. The Gila River Road below Coolidge Dam should be acquired to provide access to the Gila river at this access point. As an experienced outfitter, GRT is aware of the necessity for quick, safe, and convenient access to river "put in" points.
2. GRT supports Alternative B, Issue 2, #4, part C over a much weaker Alternative A. Issue 2, #4.
3. GRT strongly opposes Alternatives A and B, Management concern 3, #5 for historical, educational, economic. and practical reasons.
4. GRT supports Alternative A, Management Concern 3, #9 for safety, informational, and public relations reasons.
5. GRT supports Alternative A, Management Concern 5 over Alternatives B, C, and D for historical, environmental, and cultural reasons.

We at GRT wish to thank you for the opportunity to express our evluations in this planning process.

Truly,

W. E. P.

Winston E. Poston, President
Tours
Box C
Winkelman, AZ 85292

105

Steve Knox
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dept. Ecol. and Evol. Biology
University of Arizona
Tucson, Arizona 85721
6 April 1990

Dear Mr. Knox:

I am writing in support of protection for the Eagle Creek Bat Cave. I am an ecologist at the University of Arizona, and I was an assistant to Dr. Cockrum in much of the work that was done in the 1960s at this cave in determining the migrational patterns of the freetail bat (Tadarida brasiliensis) that uses this cave as a maternity roost. The exit flight of the millions of bats that were present at that time was an amazing and spectacular sight. It is much less so today, but this colony still remains one of the few large maternity roosts of this species anywhere, and certainly the greatest concentration of terrestrial vertebrates that exists in Arizona. It is a biological wonder that warrants all the protection that can possibly be provided.

105-1 In the Eagle Creek Bat Cave ACEC proposal, I strongly recommend Alternative B. I would like also to suggest the following: (1) a restriction against the discharge of firearms at least within 1/4 mile of this cave, (2) a large bronze, permanent, educational plaque positioned in some obvious location at the base of the opening of the cave (with an inscription that would describe the cave and its importance to the bats, indicate the importance of the bats, invite the public to watch the exit flight, but warn against disturbance).

I would prefer, of course, that the preservation of this cave and Lower Eagle Creek Canyon could be taken even further. I'd like someday to see vehicular travel banned, and I'd like to see this canyon somehow tied into some more major preservational plan -- one perhaps including the Gila Box. Meanwhile I'll gladly settle for protection at least of the Bat Cave. However, for this to occur steps must be taken that are much more extreme than simply a lock on the existing gate.

Sincerely,

Russell Davis

Russell Davis

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CableGraphix™ One East Camelback • Suite 550 • Phoenix, Arizona 85012 • (602) 263-6056
Fax (602) 265-0372

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

April 6, 1990

Dear Steve:

To begin, I wish to congratulate you and your team in the preparation and presentation of your plans(s). The information is easy to understand and well layed out.

I represent the Arizona Trail Riders. Inc, a non-profit motorcycle club which has existed for over 3 years. Our group is comprised of approximately 50 families who promote responsible use of trails through Arizona.

After careful review and consideration of your plans, our club feels plan "c" is the best offered. This alternate provides for the use of the land while still allowing existing wilderness areas and A.C.E.C. formation. Protection of needed variation areas will continue and development of cultural resources would be emphisezed/

We do not support the other two plans because they do no allow for the use of the land for the majority of the people. Instead, large areas would be limited or closed to satisfy the needs of a minority group. Do you really think that all that drive their motorized vehicles into the backwoods and camp, are now going to park & hike in? No way! Lets provide a plan that is realistic for the people and style of Arizonians.

Thank you for your time and consideration

Sincerely,

Peter Zepeda
President
Arizona Trail Riders

107

Dear BLM Representative, 4-5-90

A friend of mine told me last night that you are considering renewing several unused roads in the ARAVAIPA WILDERNESS AREA. This action would result in destruction of the Wilderness qualities for the area. I have special concerns of the use of 4-wheel drive vehicles having improved access to the area afterwards.

Wilderness areas are to be hiked, not driven in. Minimal impact is the reason. You are doing great disservice to the future of the United States of America by regrading roads in Wilderness Designated areas!

Please DO NOT rebuild roads, instead, you need to close MORE roads.

Sincerely,
P.E. Straley
PO Box 3537
Page, Arizona
86040

108

Apr 5, 1990

Steve Knox
RMP Team Leader
Bureau Of Land Management
425 E. 4th st.
Safford Az. 85546

Dear Mr. Knox:

I have the following recommendations and concerns: to the Safford District RMP/EIS

I urge you to adopt "Alternative B" as the most effective protection Of lands.

Allowing limited off-highway vehicle use on over a million acres of these lands would, however, not protect the land from unauthorized cross-country driving. Such a 'limited' designation would not be enforceable in such a widespread area. We recommend that you increase the number of closed acres by at least three-fourths of the 1.3 million presently planned to as 'limited' access.

Due to tha fragility and rarity of our riparian systems, you should also withdraw any fuelwood cutting areas from within one-half mile of any riparian (or intermittent stream> zone. In particular. tha Deer Creek fuelwood cutting area should be deleted from any plans.

The overall plan for Alternative B is excellent, and will serve to protect many of our resources for the future.

Very truly yours,

L. Stephen Bell

1425 N. Ridgeway Dr.
Tucson, Az 85712

109

Apr 5, 1990

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th St..
Safford

Dear Mr. Knox:

In reference to the Safford District RMP/EIS I have the following recommendations and concerns:

I urge you to adopt "Alternative B" most effective plan for environmental protection of the subject lands.

Due to the fragility and rarity of our riparian systems, you should also withdraw cutting areas from within one-half mile of any riparian stream) zone. I" particular, the Deer Creek fuelwood cutting area should be deleted from any plans.

The overall plan for Alternative B is excellent, and will serve to protect many of our resources for the future.

Very truly yours,

Sarah C. Vetault

Sarah C. Vetault

Robert E. Vetault

Robert E. Vetault

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Tucson, Az 85712

110

Draft Safford District Resource Management Plan
Public Comment Form

Issue/Management Concern: Economic Conversion Chart - Dr. Seymour Melman

Comment: Your Safford District RMP Draft exhibits extensive knowledge and is a mine of information. Also your research and energy as well as an admireable regard for public desires necessitates commendation.

Your detailed discussion and catorization in each of the viewpoints allows hope that a shift from the preferred alternative which permits a substantial amount of deterioration of natural resources to viewpoint B which allows for considerably less by, by and large, not expanding further development of recreational, mineral, ranching and other businesses that contribute to a deterioration of natural resources including air. By endlessly permitting even minimal deterioration, the cumulative effect of whatever it is always winds up hitting us exponentially; it never stays nicely packaged and within bounds.

110-1 Only one important factor was overlooked. On pages 152-156, you give Employment statistics and Economic Indicators for Greenlee, Graham, Gila, Pinal and Cochise Counties. By giving only these figures, the implication, because of peripheral limitation, is that we work with what is in front of us, or it's the "soup line." It certainly frightens anyone to think his/her way of life or job is on the line.

If on the same or opposite page as the above economic information for each county you had another set of figures describing opportunities presented by economic conversion charts done by experts in the field of economic

Name: Alva d'Orgeix
Representing: Box 451
Address: Bisbee, AZ 85603

Date: April 6, 1990

Draft Safford District Resource Management Plan
Public Comment Form

Issue/Management Concern: Economic Conversion Chart - Dr. Seymour Melman

Comment: conversion, then you would be showing some opportunities in alternatives. The cessation of one type of work, just because we are used to it, doesn't mean that another type might not prove to be limitless.

By the sin of omission, even though unintentional, it would appear that the economies of these counties (some more than others) would simply collapse if mining and grazing ceased. In 1990, this is simply not true. If there is no expert on economic conversion (not government employed, so he/she can be impartial) in this area, ask Seymour Melman, an economist and well-known conversion expert, at Columbia University, whom he would recommend as the most knowledgeable and helpful person for this kind of analysis for our area.

Again, I think your draft is outstanding. Thank you.

Name: Alva d'Orgeix
Representing:
Address: Box 451
Bisbee, AZ 85603

Date: April 6, 1990

111

phelps dodge Morenci Inc. P.O. Box 187, Morenci, AZ 85540 • (602) 865-4521

April 6, 1990

Hr. Steve Knox
RMP Team Leader
U. S. Department of Interior
Bureau of Land Management
Safford District Office
425 East 4th St.
Safford, Al 85546

Dear Mr. Knox:

RE: Safford District Resource Management Plan . Draft Environmental Impact Statement

I have reviewed the Safford District Resource Management Plan Draft Environmental Impact Statement ("DEIS") and offer the following comments for consideration in preparing the Final Environmental Impact Statement.

Before commenting on specific portions, I have the following general comments.

III-1 1. The RMP is almost entirely subjective; using estimates of impacts such as low, moderate, and high. These impact estimates do not appear to have any quantitative backing and are the personal opinion of the person preparing any particular section of the RMP.

III-21 2. You make the assumption that cost and personnel requirements of implementing a selected RMP alternative is not a consideration. To the contrary, costs of alternatives should be estimated up-front. It is, in our opinion, unwise to select a management scheme without this information. People do not do this in their personal lives, businesses cannot do this, and governing agencies should not make decisions without cost analysis.

3. Ye see a strong trend toward evaluating and reevaluating the same area for protection under various classifications until it finally meets the criteria. An example is Gila Box/Turtle Mountain WSA, Gila Box ONA ACEC, San Francisco/Gila River Wild and Scenic River Designation, Trujillo Canyon ACEC, Turtle Mountain Desert Grassland, Gila Box Riparian NCA. This continual duplication of effort is very counterproductive and breeds distrust of the BLM in the eyes of the public.

Specific comments are presented on the following pages. My comments will be referenced by page and general area for easy reference.

Page 6; Page 6. Paragraph 2; Page 231

III-3 "Two segments of the Gila and San Francisco Rivers as possible Yild and Scenic Rivers." The San Francisco and Gila Rivers south of Clifton have previously undergone analysis for inclusion into the wild and scenic river system. Following analysis of this segment, the Forest Service in 1981 chose a no action alternative. Growth of the Phelps Dodge tailings facility adjacent to the river, sights and sounds of mine operations, vehicular access for recreation purposes by residents of the local communities, and other reasons were cited in the decision. Furthermore, a portion of this area is proposed for inclusion in the Gila Box Riparian NCA. Further discussion of Wild and Scenic River designation of this segment of the San Francisco and Gila Rivers should be halted.

Page iv, Paragraph 2; Page 90.
Socioeconomic. Item 1: Page 162. Conclusions

III-4 'Mining and mineral leasing restrictions would cause low impacts to the economy.' This statement is very subjective and not quantifiable. The only thing quantifiable about mineral entry restrictions is that mining companies and individual prospectors will not locate new mineral resources if they do not have access to public lands to look for them. We agree with your statements like "Designation of wild and scenic rivers and ACEC's would provide low benefits to the economy of local tourism industries." This statement represents something proven and quantifiable. Your mining statement would only be true if mineral discoveries in virgin territory were never made, which is not supported by history.

Page 8: Management Concern 4 • Energy and Minerals

III-5 The DEIS states that 'It is Bureau policy to foster and encourage the development of energy and mineral resources." The section goes on to say that 'BLM has the authority and responsibility to ensure environmental degradation does not occur on public lands." The entire section would leave the reader to believe that it is the BLM directive that if mining causes any impact then it should not be allowed to take place on public lands. This is contrary to BLM's charge for multiple use in the development of energy and minerals on the public lands. The language should be modified to reflect language which occurs in appliable regulations. Specifically, the document should state that "BLM has the authority and responsibility to ensure that undue environmental degradation does not occur on public lands." [Underlined words should be added.]

Page 9: Management Concern 4 • Energy and Minerals

III-6 The fourth and fifth bullets from the top of the page in the left hand column appear to be contrary to the existing mining laws and the way that they function on public lands. Indeed, the questions are posed in such a fashion that indicate that the BLM is specifically trying to change the operation of the mining laws on public lands by the language which states "what terms, conditions or special stipulations should be applied to open areas that may constrain operations of the mining laws?' [Underline added for emphasis]. The resource management plan should properly plan for multiple use on public lands, not find ways to get around the existing laws so that there will be less use.

Page 11. "Wilderness"

'A district-ride re-evaluation is not warranted at this time.' Ye co"-cur with your statement. Ye would hope that there are more productive things to do than to continue to study and restudy Safford District public lands for the same purposes. It is time consuming for both BLM and interested and concerned public.

me 11. Issue 2

III-7 "Designate 17 ACEC's totaling 61,737 acres of public land to protect important natural and cultural resources." These 17 areas total 4.4 percent of the Safford District. Together with pending wilderness legislation, including National Conservation areas, a" alarmingly high percentage of the Safford District will be off limits to mineral prospecting activities, much less mineral development. How can this policy of continuing to restrict access be compatible with BLM's policy to foster and encourage the development of energy and mineral resources (page B)? The 43 CFR 3809 regulations governing mining activities on public lands are quite restrictive already. These should be adequate to protect public lands.

Page 25

III-8 "Bonita Creek ACEC monitor water quality." It does not appear that monitoring rater quality should be in BLM's realm of responsibility. The City of Safford probably already closely watches water quality at this location. Does BLN intend to contract for this service, develop in-house expertise, or add staff? What will be done if water quality declines or if it improves?

Page 25. Bonita Creek ACEC and Gila Box ONA ACEC

These study areas should be placed on hold pending designation of the Gila Box Riparian NCA and eliminated if so designated.

Page 26. Coronado Mountain RNA ACEC: Also Page 197

III-9 Designation of an ACEC adjacent to the United States' largest open pit mine is an invitation to possible future land use conflicts. Phelps Dodge currently has all or portions of seven unpatented lode mining claims in this ACEC, and is actively conducting road building and prospect drilling within 4,000 feet of the area boundary. As in the above comment, the 43 CFR 3809 regulations should be adequate to protect public lands from poorly managed or mismanaged mining exploratory work.

Page 27: Eagle Creek Bat Cave ACEC

III-10 The management prescription for the Eagle Creek Bat Cave ACEC indicates a mineral withdrawal will be instituted. However, a valid mining claim currently exists on that particular property, and will necessitate a change in the management prescription.

Page 32

III-11 'Retain all lands, not identified for disposal in public ownership " Although it is not extremely clear in this section. Phelps Dodge "assumes" the BLM will continue exchanges that are mutually beneficial and that lands 'not identified for disposal" in this section are still available for exchange as the specific need arises. For example, Phelps Dodge has been pursuing an exchange for 375 acres adjacent to its tailings facilities "ear Morenci since mid-1987 with very little response from BLM. This selected area with roads, tailings safety dams, and monitor wells is within the area proposed for retention by BLN. It appears to be in the public interest to relinquish these lands to Phelps Dodge in exchange for other private lands along the San Francisco River corridor also identified as "proposed retention*.

Page 33

III-12 'Withdraw 29,104 acres, including administrative sites and campgrounds, from mineral entry to preserve important resource values.* This alone is 2.1 percent of the Safford District and coupled with ACEC proposals in Alternative A results in closures or restrictions to mineral entry of 6.5 percent over and above wilderness and NCA areas.

Page 33: Management Concern 3 ▪
Outdoor Recreation and Visual Resource Management

The Bonita Creek and Gila Box Special Recreation Management Areas SRMA's should have boundaries modified to reflect the recently proposed Gila Box Riparian Area National Conservation Area boundaries.

Page 34: Item 11

Designation of Eagle Creek canyon, which is entirely privately owned, as a VRN class two area will not serve any real constructive purpose. Since the private owner can construct facilities along the canyon on private lands, the designation of any BLN land in the area has little to no effect on the total impact of the visual resource management in the area.

Page' :

Under alternative B, the recommendation of certain river segments as suitable for inclusion in the National Wild and Scenic River system shields the importance of this activity. These recommendations should be done in a separate action and not as part of a resource management plan in order to allow the local public a more full view and review of the process.

Page 53:

III-13 The reference to the AEPCO powerline corridor under item 4a and the exclusion of the Gila Box ONA ACEC for right-of-way areas are "at compatible since the AEPCO line traverses the Gila Box ONA ACEC under alternatives A and B. Furthermore, a subsidiary powerline which feeds the entire Morenci/Clifton and Black River area traverses the Gila Box ONA ACEC under alternative B.

Page : f ected Environment • Air Quality

III-14

This section suggests that the pH of rainfall in the Gila Valley is the result of smelters which operate "in the vicinity of Norenci. Globe. Mammoth, Hayden-Winkleman, and near the border area of southern . . . Cochise county'. However, the section doesn't recognize that the smelter at Norenci has been idle since 1984 (during nearly the entire period of measurement) and the smelter in Cochise County has been shutdown for nearly that same period of time. However, the statement is made that the "precipitation samples are collected weekly and have consistently been measured at pH 4.7 over a 6-year period.' If the pH of the rain were due to the copper smelters in these areas as suggested in the DEIS, it would appear that there would be some change as smelting ceases. The affect of automobiles in the Safford valley and the major metropolitan areas of Tucson and Phoenix should be considered as they have much greater impact on the air quality of the region than these single sources.

Page 131

III-15

The section dealing with Geology of the Safford district is deficient and should be expanded to indicate at least two activities. The statement is made that "Phelps Dodge has developed one underground orebody there but ceased mining in 1983." This sentence should be modified to state that Phelps Dodge "temporarily suspended" mining in 1983 rather than "ceased'. Although the section describes some development at the Sanchez Mine for the future. nothing is said of the large Lonestar deposit lying between Dos Pobres and Sanchez which will someday be mined. This particular deposit contains over 1 billion tons of ore and dwarfs both of the other mining developments which are mentioned in the section.

Page 148

III-161

Under Visual Resources, the impact of agricultural modification and modifications due to mining is described in some detail. However, there is no mention of the significant modification to visual resources which has occurred by the development of towns and infrastructure for towns in the area.

Page 149

III-17

.Table 3-5, which lists ACEC nominations and summarizes the decision regarding whether they are or are not qualified for ACEC studies, designates the Eagle Creek ACEC as qualified for study. However, the Eagle Creek ACEC contains predominantly private lands and the reasons for having special management are directly tied to all of the riparian lands which occur on the private lands. This area should not be studied for ACEC status.

Page 164: Socioeconomic Impacts: Alternative B • Environmental Consequences

III-18

The inference that increases in primitive recreation use would result in higher local sales from people using these areas is simply not documented in the literature. In fact, quite the opposite is true and has been documented by several authorities on the subject. The very uses that would be closed as a result of ACEC designation to vehicular traffic are the very ones which are currently used by people engaged in fishing and hunting activities and other recreation activities on the public lands. These vehicular accessed activities would no longer occur in the area and the people who use these areas for this type of activity would not be willing to hike in to do the same thing.

Page 183. Acquisition of Legal Access. Item 14

III-19

This item targets BLM gaining access on some parcels that have been offered to BLM in exchange for selected lands adjacent to the Morenci tailings storage facilities. It is assumed that this form of access. acquisition, is the desired form.

Pare 187. Bonita Creek ACEC

The ACEC designation should be placed "on hold' pending action on the Arizona wilderness bill. If the Gila Box Riparian NCA is designated, this ACEC should be dropped.

Page 188 ONA ACEC

III-20

This ACEC designation should be placed "on hold" pending action on the Arizona wilderness bill. If the Gila Box Riparian NCA is designated, this ACEC should be dropped. The statement is made "also included is the 'last free flowing stretch of the Gila River in Arizona'." This particular quotation is used in other places in this report, is not referenced, and is not true. It should be removed and described otherwise.

Page 9

III-21

Under section 4 • Special Management Provisions, the DEIS indicates that authorization of rights-of-way would be prohibited in the Gila Box ONA ACEC. Under certain alternatives, this could mean that the request for renewal for right-of-way for existing powerlines would be refused in the future and the towns of Clifton and Morenci and Point of Pines would be no longer able to have power supplied to them.

Page 190

III-22

Under item 5, Alternatives Considered section, it is stated that access by vehicle along the San Francisco River would be closed to off-highway vehicle use. This would essentially cut off recreation opportunities to all the residents in the area and would take away one of the few drawing cards for tourism and recreation which the town of Clifton has.

I appreciate the opportunity to comment on the Draft EIS of the Safford District Resource Management Plan. The document reflects a sincere effort to develop a plan to wisely use the resources of the Safford District. I trust that the multiple use management directive will be adequately reflected in the Final Draft.

Very truly yours,

EMS/FJM:sp

cc: J. G. Clevenger
J. L. Madson

112

American Rivers

April 6, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management Plan
425 E. 4th Street
Safford, Arizona 85546

Re: Draft Safford District Resource Management Plan and Environmental Impact Statement

Dear

Introductory Comments

American Rivers is a national, public interest not-for-profit corporation with more than 13,000 members nationwide. American Rivers is the only national conservation organization dedicated exclusively to the preservation of free-floving rivers. sixteen-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 federal agencies in planning for the river resources on the lands they administer. We have assisted the planning staff of the Bureau of Land Management ("BLM") in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and have reviewed, commented on, and protested numerous BLM plans. We have worked similarly with the U.s. Forest Service in developing administrative direction for the evaluation and management of potential wild and scenic rivers on the National Forests, and reviewed, commented on, and appealed numerous land and resource management plans issued by that agency.

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 "se 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.

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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 R quirements of the Wild and Scenic Rivers Act (the "Guidelines'): issued September 8, 1988.

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 eliaibility 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 the national rivers system, based upon the public values and "ses 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 more detailed recreation area management plans or project plans. Guidelines, Section IV.C., at p. 7, Section Ix, at p. 20. As a substantive decision regarding the appropriate management of a sensitive area, the planners' decision regarding suitability must be accompanied by environmental analysis pursuant to the National Environmental Policy Act ("NEPA"). Guidelines, Section VIII.B. at p. 15-16.

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: "[T]he 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.

Specific Comments

1. Eligibility

The eligibility analysis contained in Appendix 5 demonstrates the attention and sensitivity of the planners to the eligibility of the Gila River and San Francisco River for inclusion in the national rivers system. The planners have substantiated well their conclusion that these rivers possess outstandingly remarkable values. In particular, the planners have recognized that perennial rivers are very uncommon in the Southwest, and that this feature alone may indicate that a stream possesses outstandingly remarkable hydrologic values. RMP at 232. The importance of preserving the remnants of the Southwest's remaining riparian vegetation, particularly important for fish and wildlife, ecological and recreational values, is also recognized by the planners. Id.

American Rivers commends the Safford planners for evaluating the eight mile segment of the San Francisco River, a river not listed on the Nationwide Rivers Inventory (SRI). See Appendix 5. A failing common to other plans is an examination of rivers only on the NRI.

112-1

However, the RMP fails to examine the eligibility of other streams that are obvious candidates for inclusion in the national rivers system. There is no indication that other streams which flow across the Safford Resource Area were evaluated for their potential inclusion in the national rivers system. nap 34 identifies numerous streams within the Resource Area which possess riparian habitat, including Aravaira Creek. San Simon River, Bonita Creek, Eagle Creek and the San Pedro River. While the presence or absence of riparian habitat does not determine the eligibility of a river, it is en indicator that a stream in the desert Southwest may possess outstandingly remarkable ecological or fish and wildlife values. Also, Map 34 is one of the only sources of data within the Plan which identifies free-flowing streams.

Additional candidate rivers may be found among those areas nominated by the planning teem for ACEC consideration, including Bonita Creek, and Guadalupe Appendix 2. Bonita Creek, for example include* habitat for several threatened and endangered wildlife species and National Register quality cultural resource sites. RMP at 187. Either of these value* suggest the Creek is an eligible river. The stream and it* corridor supports one of the highest numbers of breeding bird specie* found in the United States and supports the greatest standing crop biomass of fishes recorded in a South-western stream can leave no doubt that this stream should not merely be found eligible, but should be recommended to Congress for designation. See id

Turkey Creek possesses regionally significant cultural and scenic values, riparian community and wildlife resources. RMP at 189. In fact, the Turkey Creek cliff dwelling is described es one of the most intact prehistoric structures of its kind in south-eastern Arizona. RMP at 52. These values suyyest strongly that Turkey Creek is an eligible stream.

The Dry Spring Research Natural Area ACEC should be included within the Gila River corridor. See RMP at 192 et seq. These springs comprise an exceptionally rare undisturbed desert resource. Id. American Rivers believes that the Gila corridor should be expanded to include this outstandingly remarkable area.

Guadalupe Canyon undoubtedly possesses outstandingly remarkable ecological and fish and wildlife values. see RMP at 195 et seq. This area is one of the premier birdwatching area* in the United States and also possesses unique botanical and wildlife values. Id. American Rivers believes strongly that Guadalupe Creek qualifies for inclusion in the national rivers system.

American Rivers wish to emphasize the fact, sometimes overlooked by individual planner*, that ecological values may qualify a river for inclusion in the national rivers system. see U.S. Departments of Interior and Agriculture, National Wild and Scenic Rivers System; Final Revised Guidelines ibility, Classification and Management of River Areas ("Interagency Guidelines"), 47 Fed. Reg. 39454, 39457 ("In addition to the specific values listed in Section 1(b) of the Act, other similar values, such es ecological, if outstandingly remarkable, can justify inclusion of a river in the national rivers system.").

The planning documents include a table of threatened, endangered and special status plants and wildlife species, Table 3-2 at RMP 137 and Table 3-3 at RMP 146, however, there is minimal information a* to where such species are to be found in the planning

area. When the planners assess the eligibility of individual rivers. serious attention should be given to the presence of such species, both es indicators of ecologic values and fish and wildlife values.

112-1 The planners must undertake a serious evaluation of the free-flowing streams in the resource area to determine whether they possess one or more outstandingly remarkable values that might qualify them for inclusion in the national rivers system. The failure of the Safford planners to consider all of the area's streams exposes those with high values that may be eligible for inclusion in the wild and scenic rivers system to development that can significantly degrade their values and to damming or diversion that could disqualify them for future consideration.

American Rivers suggests that assessment of other rivers. streams and creek*, including tributaries and headwaters, within the Safford Resource Area will result in the identification of other rivers, streams and creeks eligible for inclusion in the national wild and scenic rivers system.

112-1 The Final RMP should expand Appendix 5 and include a separate identifiable assessment of the various streams and their values examined by the planners.

2. River corridor*

112-2 The RMP states that the study corridor for Gila River did not extend to the one-quarter mile required by the Guidelines, but included only the canyon itself. see RMP at 231. The planners are mistaken in restricting the study corridor to less than the distance required by administrative direction. Further, American Rivers believes that such a restricted corridor fails to appreciate that many people enjoy the values of a river canyon from the canyon rim. Extension of the boundaries to include a full-quarter mile will meet the policy objective of the wild and rivers system, which is to preserve free-flowing rivers and their adjacent landscapes. Eligibility determinations are required to reflect the resource values of the stream itself and the lands within the study boundary; arbitrarily narrowing, or even ignoring, the required corridor of streamside lands may exclude resource values that should be evaluated together with the values of the stream itself.

American Rivers appreciates the recognition that the corridor may be larger if necessary to preserve resource values, and we commend the planners recognition of this by expanding the corridor to include the canyon walls where they are greater than one-quarter mile from the river. Id.

3. classification

American Rivers believes the classifications set forth in the "Classification Determination" of Appendix 5 are sensitive to the standards *et forth in administrative directive.

112-3 However, we are deeply concerned with the proposal to arbitrarily "under-classify' various segments as is set forth in the "Formulation of Alternative*." E.g., RMP at 236.

The Wild and Scenic Rivers Act provides that each component of the system shall be "administered in such a manner a* to protect and enhance the values which caused it to be included in said system.. ." Section lo(a); 16 U.S.C. section 1281(a). This section of the Act has been interpreted as stating a "nondegradation and enhancement policy for all designated river areas." se* Interagency Guidelines, 47 Fed. Reg. 39454, 39458.

112-3 American Rivers is concerned that a number of river segments will be exposed to inappropriate levels of development due to improper classifications. The Plan include* several examples of "under-classification" that threaten to degrade and impair the values Of eligible and suitable rivers pending Congressional consideration. Such "under-classification" is in plain violation of BLM policy which provides unequivocally that "[t]he potential classification of a river is based on the condition of the river and the adjacent lands as they exist at the time of the study." Guidelines, VIII.A.2.

the plan documents that segment 2 of the Gila Box qualifies as "wild" based upon the current level of stream-side development. RMP at 235-36. There are no roads along this portion of the river. Id. Despite the current wild character of this segment, two alternatives would inexplicably establish a scenic classification for this segment. RMP at 236. There are several similar examples of such inappropriate classification throughout Appendix 5.

For the reasons stated above, the decision to "under-classify" a river segment is in contravention of BLM administrative policy and the directive of the Wild and Scenic Rivers Act for federal agencies to enhance and maintain outstandingly remarkable river values.

112-4 Further, the RMP contains no analysis of the adverse impacts of development which would be permitted in a wild but not a scenic classification. Such development could foreclose congressional designation of the river as a wild rives.

Finally, the decision to "under-classify' merely to provide a range of alternatives fails to comply with the guidance for alternative classifications set forth in the Interagency Guidelines. See Interagency Guidelines, 47 Fed. Reg. at 38458. The Guidelines make plain that an analysis of alternative classifications is an unusual occurrence, and arises only on those occasions that there may be an "authorized but not yet constructed project[], which if constructed would alter the classification of the river area." Id. This very limited justification for analysis of alternative classifications is not the basis for the recommended range of alternative*.

4. 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: "[T]he 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.

The Guidelines address in detail the scope of management prescriptions that should be adopted:

> Specific management prescriptions for river corridor* identified from the NRI list, or otherwise identified for study, should provide protection in the following ways:
>
> 1. Free-flowins 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 right*) and, to the extent practicable, enhanced.
>
> 3. Classification Impacts. Management and development of the identified river and it* 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.

112-5 The Safford RMP fails to include any specific prescriptions and thereby fails to comply with agency directive. The Draft Three Rivers RMP recently issued in Oregon contains management prescriptions that are consistent with the BLM Guidelines and will provide appropriate guidance to BLM and the public of those actions that are appropriate within the relevant river corridor. American RIvers suggests that the Safford planners consult with the Three Rivers planners on this issue.

5. Preferred Alternative and Suitability Determination

American Rivers is deeply concerned with the proposal to recommend only a 10.2 mile segment of Gila River as a recreational river for Congressional designation. RMP at 28. we believe that the Plan has failed to demonstrate that the other eligible river segments are not suitable. We strongly urge that the Safford Final RMP reexamine closely the suitability issue and recommend appropriate eligible river segments for Congressional designation.

The RMP documents that the Gila River and San Francisco River remain free-flowing and possesses outstandingly remarkable values and is therefore eligible for inclusion in the nation wild and scenic rivers system. The Final RMP should reexamine whether these rivers (and other eligible streams) are suitable for inclusion by Congress in the national wiid and scenic river system. That decision necessarily requires a weighing of the relative public value of the streams as protected components of the national rivers system against the public values associated with other possible uses of the river. The Wild and Scenic Rivers Act mandates that inquiry and establishes a national policy that "certain selected rivers . . . be preserved in free-flowing condition, and . . . protected for the benefit and enjoyment of present and future generations." 16 U.S.C. section 1271 (emphasis added). The Act's policy of preservation of selected rivers balances the established national policy favoring dam and other development at appropriate sections of our nation's rivers. Id. The fundamental task that the BLM faces with respect to any potential wild and scenic river! therefore, is to balance properly the competing values of the river if preserved or developed.

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 management prescriptions for a river area in its forest plan, 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.

Further, the Plan documents well the outstandingly remarkable values of the remaining free-flawing streams in the resource area. Several are unquestionably suitable for inclusion in the national rivers system. We urge the planners to reexamine this issue during the preparation of the Final RMP.

We trust these comments are helpful during the Resource Management Plan process. We look forward to participating further in the RMP process. If you have any questions concerning any of the matters set forth above, please do not hesitate to communicate with me.

Sincerely,

Thomas J. Cassidy, Jr.
Public Lands Counsel

cc: Gary Marsh

113

THE I_*
DESERT TORTOISE COUNCIL

RECEIVED
BUREAU OF LAND MANAGEMENT
APR 9 1990
SAFFORD DISTRICT

	ACTION	INFO	INITIAL	DATE
DIST. MGR.				
P.I.O.				
P.&E.C.				
RESC. MGT.				
ADM.				
OPERS.				
SLA				
SAN SIMON				
FILE		DISCARD		

cc pla
cc made for file

March 30, 1990

Mr. Ray A. Brady, District Manager
Safford District Office
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Mr. Brady:

113-1 The Desert Tortoise Council has reviewed the draft Safford RMP. We have limited most review directly to the desert tortoise. The Desert Tortoise Council stands very disheartened at what is

With this introduction, we trust you will understand the adversarial and severely disappointed tone this comment letter takes. As regards the BLM's commitment toward management of desert tortoise habitat, Safford BLM seems content to stock this document with wordage having nothing to do with your own agency's Management of Desert Tortoise Habitat on Public Lands: A Rangewide Plan. This plan has been in existence for two years and the Safford Office has had sufficient time to prepare for dealing with the desert tortoise issue. Essentially, it appears the Safford Office does not regard the "Rangewide Plan" plan as real nor does it feel obligated to carry out the objectives and management actions detailed in the plan as a serious necessity.

113-2 We read the Rangewide Plan and the Supplemental Wildlife Program Guidance for Planning as requiring goals, objectives, prescriptions, descriptions of resources and their extent, conflicts, habitat opportunities for expansion, maintenance, or improvement for priority species. About the only thing positive this document does is identify the desert tortoise as a priority species (page 30). Then the tortoise and many other "priority

113-3 species" are dropped from subsequent consideration. Other items required in BLM Supplemental Program Guidance for Planning and the Rangewide Plan are disregarded.

113-4 We have been informed time and again for years that the Safford District has been performing desert tortoise "inventories". Quite a bit of effort, we've been led to believe. Yet the draft RMP proposes to do more INVENTORY (page 31)! On 29,000 acres? This is absolutely ridiculous! How much habitat does Safford District have compared to other BLM offices? Surely not that much.

113-4 We submit that if Safford District must spend two more years after that already spent with inventory to categorize a small amount of habitat, it has wasted a great deal of the taxpayers' money in the meantime. Additionally, the draft proposes to categorize the habitat two years from now! The "Rangewide Plan" says that RMP documents (land use plans) are where categorization will be made and largely how the Rangewide Plan will be implemented. How would

113-5 Safford District propose to formally categorize habitat outside this land use plan? We hereby demand that BLM incorporate the "Rangewide Plan" in this draft RMP and stop beating around the bush. How otherwise does Safford BLM propose to implement the "Rangewide Plan", please specify?

The areas identified in #14 on page 31 are too small to harbor viable populations of desert tortoises. Are they contiguous with other lands? Whose lands? What is BLM's analysis of these populations?

Where are the maps of the proposed interim Category 3 and Category 2 areas?

113-6 The alternatives seem poorly described and we can see little clear difference between them.

Management Concern 1 (wildlife) does not appear different between the In fact, Alternative D (No action), page 80, has more actions for wildlife than the other alternatives. Since the other alternatives really do nothing with respect to the desert tortoise, we recommend Alternative D for implementation, as no action would seem more appropriate than doing more of the same, which has been either a lot of nothing or not a lot of anything. If the tortoise and its habitat are significant, manageable resources in the Safford District, BLM should take decisive actions in the RMP. Otherwise, other BLM offices may make better use of the taxpayers' money, and Safford should get on with other resource management activities.

Page 159. Environmental Consequences. This is the worst section we have seen in any BLM EIS. The consequences for wildlife are extremely vague, without described cause-effect relationships nor with supporting documentation, that they are meaningless and do not significantly vary between alternatives. In fact, this supports the feeling expressed earlier that the alternatives are not

113-7 significantly different from each other. There is no wide range of alternatives listed described in this document. The Consequences section is so bad that the following atrocious quote from page 163, last paragraph, represents the entire chapter: "Disposal of public lands would result in low impacts to wildlife habitat since the land would no longer be under BLM management". Now that is a circular impact description if we ever heard one!

There is no way to tell in this document whether under any alternative BLM would plan on disposing or acquiring desert tortoise habitat. In addition, the desert tortoise is not mentioned in the Environmental Consequences section.

Mr. Ray Brady -3- March 30, 1990

113-8 We noticed in the Consultation and Coordination section the Desert Tortoise Council is not listed.

We thought BLM was serious about management of habitat to ensure the continued existence of the desert tortoise and to prioritize areas for intensive management. The draft RMP appears to refute that idea, in fact, flagrantly disregards the content and intent of the "Rangewide Plan". We hope other significant resource values were not treated as was the desert tortoise. If so, we fear for their future.

113-9 The Desert Tortoise Council is not only an affected party to decisions made as a result of this plan, but has an intense interest in the proposed natural resource management over desert tortoise habitat in the Safford District and the rest of the tortoise's range. We demand a copy of the Final Plan, when prepared, and a description of procedures for protesting the plan.

Sincerely,

J. A. St. Amant
Senior Co-chairman

cc: Acting Arizona State Director
BLM Director Jamison
BLM Chief, Division of Fish and Wildlife
Board of Directors

114

PETITION

TO: Bureau of Land Management
U.S. Department of the Interior
425 E. 4th Street
Safford, AZ 85546

RE: Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS)

THIS PETITION is in regard to the use of the high country above Aravaipa Canyon. We request that you do not open the road across Virgus Canyon. The area west of Virgus should be open to equestrian and foot travel only. At present, there are many 4-wheel drive roads in the Turkey Creek-Table Mountain area. There is a need for equestrian trails outside of the Aravaipa Creek itself and horses and ORVs are a dangerous combination.

NAME	ADDRESS			DATE
P.D. TILLMAN	6521 NCP FELIPE	TUCSON	18	3-29-90
Linda Brewer	3930 W. Pl. de Castellon	Tucson	85745	3-30-90
[illegible]	90 E Grant	Tucson	85719	3-31-90
Hannah Glassten	2419 E MABEL	Tucson	85716	4/5/90
Barbara Koenig	220 W. Corrina Fairbanks	Tucson	85704	4/5/90
Evelyn P. Lance	11420 E Escalante Rd	Tucson	85730	4/6/90
CLARE T. BONZAN	6170 E. 2ND ST	TUCSON	85711	4/7/90

115

April 7, 1990

Steve Knox
RMP Team Leader
Burear of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Steve Knox:

Grazing of cattle can no longer be ignored as a harmless industry. It is responsible for the desertification of Arizona. Please hear our plea. Our precious scarce resources are deminishing day by day. Encourage the keeping of cattle from the riparian zones in the Safford district. Alternative "B" is the most sensitive to environmental issues. We want cattle off our public lands not only for the sake of the wild animals which are destroyed each year by the ranchers but for the water shed which suffers, depleting the aqua fur. Now is the time to act. The greenhouse effect is upon us. We must work toward reforestation of the land. This can never be accomplished if private industry is allowed to cause the desert to become a wasteland.

Thank you for listening to the concerns of those who love this state and those who wish to preserve its beauty and usefulness for our children and theirs.

Sincerely,

Pratima McDonald, M.A.
1342 N. Camino Miraflores
Tucson, AZ 85745

1

116

FLYING U W RANCH
P.O. BOX 689
FLORENCE, ARIZONA 85232

April 1, 1990

Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford. AZ 05546

Dear Mr. Knox:

Ye hare studied the draft Safford District Resource Management Plan and Environmental Impact Statement and also attended your open house comment session. We comments to offer for your consideration. Although our feelings are pretty much the same for the whole Safford district. we would like to address our comments primarily to the areas within and surrounding the Aravaipa Wilderness.

After considering all the proposed alternatives, we probably favor Alternative D, but with several important exceptions.

First, and perhaps foremost, we strongly oppose the opening of any new areas to OHV use, whether restricted or unlimited. Such use would be extremely detrimental to the primary resource, the soil and water, causing increased erosion, a degradation of water quality in the creek and adjacent springs, and the destruction of vegetation. AS we all know, increased access will draw more users rho are less conscientious about littering and abiding by rules and laws. with no or inadequate provisions being made for enforcement

and supervision, these fragile areas will be ruined. Increased OHV use will seriously affect the adjacent private land owners who already are forced to cope with the ever-increasing burden that recreational use incurs.

Ye also object to any attempts to reintroduce beaver into Aravaipa Wilderness. This could cause potential for damage and problems to downstream property owners and water users. As far as there is no study to indicate what effect beaver may have on the endangered fish species in the creek. Beaver just might help to provide a more favorable habitat for the exotic species that have already invaded some areas.

Ye oppose BLM's acquisition of the 680 acres of private lands on the east and rest ends of Aravaipa Wilderness. Such an acquisition will only give BLM more freedom to increase recreational use in the area. attracting more visitors. Such use will force Pinal and Graham counties to spend more on road improvements putting a greater tax burden on these countyes' citizens.

116-1 Since we oppose increased recreation in the area, we naturally oppose BLM's development of an "activity plan" for the use aod acquisition of lands adjacent to Aravaipa Wilderness. A human daily "carrying capacity" for AWhas already been set. How do you propose to solve the problems that will be created by the greater numbers of visitors to the area?

One thing that was suggested at your open house at the Central Arizona College Aravaipa Campus was the possibility that BLM may be considering acquiring lands along the San Pedro

river between Winkelman and Benson to be turned into a special recreational use and wildlife area. Ye vehemently oppose this. The San Pedro is vital to the agricultural interests of Pinal county. Remove1 of these lands from county tax roles would place a further burden on an already economically depressed county. There already exists enormous problems with the public on the adjacent lands. We don't need any more. Also, it just doesn't make sense for BLM to reacquire lands it has traded away in the past.

Finally, perhaps our gravest concerns are with BLM itself. We are very concerned by BLM's lack of concern for the private land owners adjacent to BLM controlled lands. Also, like so many other land managing agencies, BLM makes no provisiona for enforcement and supervision of the increased numbers of users it attracts. The policies BLM is embracing are like a caneerous growth. There seems to be no end to the lands you attempt to acquire and control. BLM's main emphasis is on recreation and public use and access. BLM is speeding away from production and management of our public lands and at the same time building its own gigantic bureaucracy. Such policies are very dangerous, not only for the local people involved, but for the well-being of our nation.

We hope you will give consideration to our concerns. Thank you for your attention.

Sincerely,

Walter and Francie Meyer

117

College of Medicine
Department of Anatomy

THE UNIVERSITY OF
ARIZONA
HEALTH SCIENCES CENTER

Tucson, Arizona 85724
(602) 626-6084 or 626-6655

April 5, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E 5th Street
Safford, AZ 85546

Dear Mr. Knox,

In I have often heard of problems that relate to the Eagle Creek Bat Cave and I am writing to express my sincere concerns about its preservation. Some of its value as a wildlife resource has already been lost irreparably and we need to do all that is possible to preserve this unique place.

Late in the 1950's and on into the 60's, I was part of 8 group which made annual trips to the Cave to study the population dynamics of the Mexican free-tailed b e t colony that uses the cave e s a "maternity ward." To observe the daily flights of the millions of pregnant or lactating females to their feeding sites in the Gila drainage was a sight to behold! I realize that for many reasons the bat populations at Eagle Creek have fallen considerably and this is all the more mason to pay more attention to the factors that might be harmful to the colony. These bats need to be protected.

117-1 It would seem to me that a locked gate to the area would be almost a necessity. T h e idea of frequently posted conservation notices could also b a helpful. I would strongly support the idea of prohibiting fire arms discharge within a 1/4 mile circumference of the cave.

I hope that these comments will be helpful in the determination of measures to protect the Eagle Creek bat cave.

Sincerely,

Joseph T. Bagnara, Ph.D.
Professor

JTB/dd

118

INDIANA BAT/GRAY BAT RECOVERY TEAM

C/O Richard L. Clawson
Missouri Department of Conservation
1110 S. College Ave.
Columbia, MO 65201
6 April 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Knox:

I recently have learned that BLM is considering protection for the Eagle Creek Cave population of Tadarida brasiliensis. In response to the request for public input, I would like to support efforts to protect Eagle Creek Cave as an Area of Critical Environmental Concern.

Data collected by Dr. Don Wilson of the U.S. Fish and Wildlife Service indicate that vandalism is a major cause of decline of the bat population. In light of this, Alternative B, to protect the entire Eagle Creek canyon, would make control of access to the cave much easier. Construction of an effective gate in the entrance to the cave also should be considered. The Recovery Team would be pleased to offer advice regarding gate design. In addition, the Team recommends signing of all bat caves with an appropriate conservation message, so that the public will be informed of the reasons for protective measures instituted on behalf of bats. 118-1

Thank you for the opportunity to comment on this important matter. If I may be of further assistance, please do not hesitate to contact me.

Sincerely,

Richard L. Clawson
Team Leader

119

12 April 1990

4500 W. Speedway
Tucson, AZ 85745

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Knox,

This letter is in reference to the Safford District RMP and associated EIS. I wish to make two points in this letter. One is that everything possible should be done to further statutory protection of the Gila Box canyon. At present there seems to be movement toward a National Conservation Area designation for the priceless riparian zone, and I ask that the BLM do everything in its power to support this protection.

The second point I wish to make is that the Eagle Creek Bat Cave ACEC is a vital resource that is deserving of all the protection that can practically be applied. Towards that end I believe that it is desirable to acquire more of the land around the cave entrance and to enforce all possible protections against unnecessary harassment of the bats. By now there is a well developed methodology for gating cave entrances so as to exclude unqualified humans without impairing the cave environment for the bats. This should be done at the earliest possible opportunity. Part of management of this cave should also be an education campaign aimed at minimizing harassment of the bats. Additionally, a monitoring effort should be initiated to quantify the current rate at which the bats are disturbed. If it can be shown that the degree of solitude afforded the bats is sufficient for their needs, the BLM will be in a lot better position to justify only a small ACEC around the cave entrance. In the Safford RMP is an alternative (B) that maximizes protection of the cave resource through additional acquisition and protection of the canyon. While it may not be within the financial resources of the BLM to acquire the entire 3160 acres in timely fashion, it should be a land management objective to acquire whatever lands are needed for maximal protection of this unique and irreplaceable cave environment. The Preferred Alternative does not apparently do this.

119-1

Please note my support for full protection of the riparian and cave resources of the District, especially the Gila Box and the Eagle Creek Bat Cave ACEC.

Sincerely,

Gordon Rodda

120

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO:

LC-159
ENV-6.00

APR 12 1990

Memorandum

To: Mr. Ray A. Brady, District Manager, Safford District Office, Bureau of Land Management, Attention: RMP Team Leader, Mr. Steve Knox, 425 E. 4th Street, Safford AZ 85546

From: Regional Environmental Officer

Subject: Review of Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Safford District in Arizona (Your Letter of January 1990) (Environmental Impact Statement)

We have reviewed the draft RMP/EIS and have the following comments to offer.

Specific Comments

In the "Environmental Consequences" summary (page iii), it is stated that management of "Areas of Critical Environmental Concern" (ACEC) under "Alternative A" would provide high benefits to riparian vegetation, while ACEC management under "Alternative B" would provide moderate benefits to riparian vegetation. This appears to be conflicting since "Alternative B" proposes more intense management of significantly larger riparian areas than are recommended under "Alternative A" (the agency preferred alternative), which emphasizes multiple use and is subsequently less protective of ACEC's, riparian areas, etc.

General Comments

120-1

We find no mention in this document of the Bureau of Reclamation's (Reclamation) withdrawn lands within the Safford District. Public Land Order (PLO) 5269, dated October 11, 1972 (copy enclosed), withdrew 1,988.63 acres in Cochise County, Arizona, for the Central Arizona Project's proposed Charleston Dam and Reservoir. Enclosed is a map showing the location of the land withdrawn by this PLO.

Since the withdrawal, subsequent memoranda have been exchanged between the Bureau of Land Management (BLM) and Reclamation regarding withdrawal reviews, rejustification, requests from BLM, and Reclamation's request for the continuance of the withdrawal. A meeting was held on June 25, 1985, between BLM and Reclamation and it was agreed that Reclamation would reevaluate its need to retain all the land. BLM indicated a willingness to accept Reclamation's request for modification and continuation of the PLO, provided Reclamation would consider the release of any land not essential to the project, particularly those parcels which would not be subject to inundation by the reservoir.

On January 16, 1986, a memorandum (copy enclosed) was sent to the State Director, Arizona State Office, BLM, indicating that Reclamation had reevaluated and determined that certain lands could be relinquished and that the withdrawal review report be amended to delete 592.75 acres.

However, due to the National Wildlife Federation lawsuit, BLM has been unable to revoke any part of the lands and, therefore, all the lands are still carried on Reclamation records.

If you have any questions, please call Ms. Mary Laswell at FTS 598-7710.

William E. Rinne

Enclosures 3

72 17897

UNITED STATES
DEPARTMENT OF THE INTERIOR

CODE OF FEDERAL REGULATIONS
TITLE 43--PUBLIC LANDS: INTERIOR

CHAPTER II--BUREAU OF LAND MANAGEMENT
APPENDIX--PUBLIC LAND ORDERS

PUBLIC LAND ORDER 5269

(Arizona 822. 3753)

ARIZONA

WITHDRAWAL FOR PROPOSED RECLAMATION PROJECT

By virtue of the authority contained in section 3 of the Act of June 17, 1902. 32 Scat. -388, as amended and supplemented, 43 U.S.C. 8416 (1970), it is ordered as follows:

Subject to valid existing rights, and to the provisions of existing withdrawals, the following described public lands which are under the jurisdiction of the Secretary of the Interior are hereby withdrawn from all forms of appropriation under the public land laws, including the mining laws (30 U.S.C., Ch. 2), but not from leasing under the mineral leasing laws, and reserved for the proposed Charleston Dam and Reservoir, Central Arizona Project:

Gila and Salt River Meridian

T. 21 S., R. 21 E.,
sec. 1, lots 1 to 4, incl.;
sec. 12, lots 1, 2, SE¼NW¼, N½SE¼, S½NE¼.

T. 21 S., R. 22 E.,
sec. 5. lots 1, 2, S½SE¼, NW¼SE¼;
sec. 6. lots 3 to 9, incl., SE¼SW¼, excluding Mineral Patents 6967, 8968, 6969, 14930;
sec. 7. lots 1. 2, N½NE¼, SW¼NE¼, E½NW¼, NE¼SW¼;
sec. 9. S½NW¼;
sec. 33. lot 1, NE¼, E½NW¼.

T. 22 S., R. 22 E.,
sec. 4. lot 11, lots 23 to 33. incl.,
lots 36. 39, 46. so. 57, 59, 62. 63.
lots 67 to
lots 72. 73. 76. 77.
lots 82 incl.,
lots 87 to 90, incl.,
lots 93 to 103, incl.;
sec. 9, lots 1 to 4, incl., E½NE¼.

The areas described aggregate 1,988.63 acres in Cochise County.

Portions of the lands are affected by Powersite Classification No. 438, as established by the Departmental Order of Novembser 16, 1956.

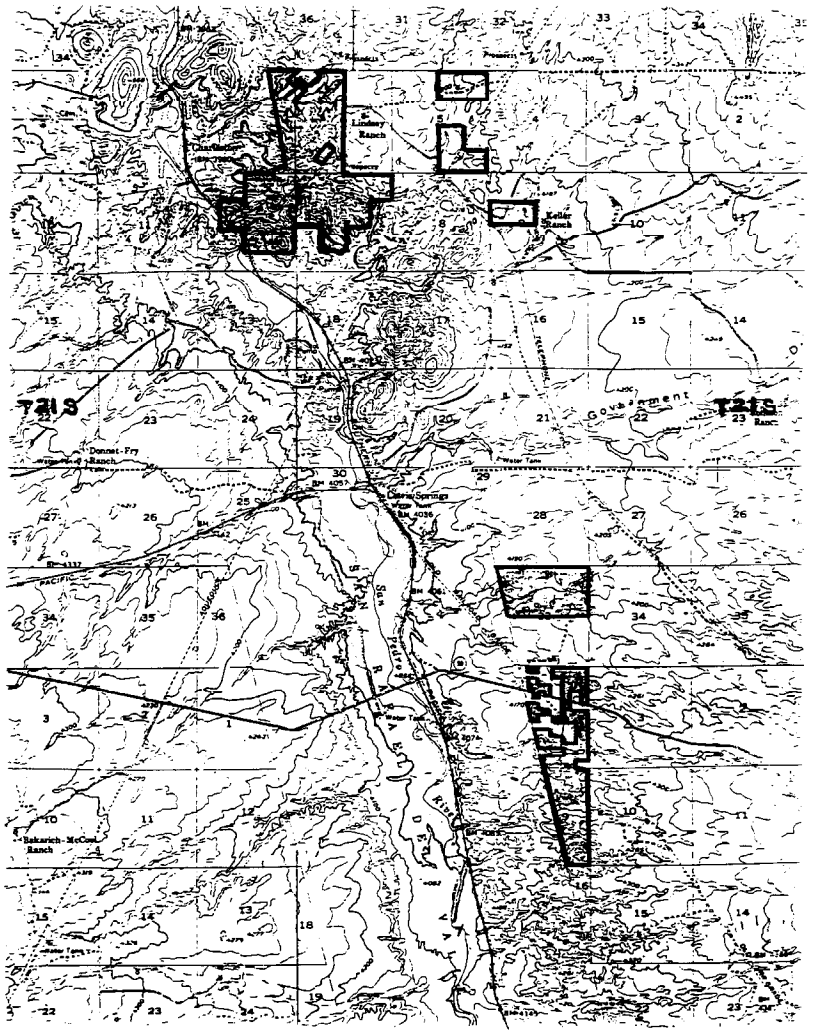
Harrison Loesch

Assistant Secretary of the Interior

OCT 11 1972

Certified to be a true copy of the original

Edward T. Fraume
Certifying Officer



7-1596 (6-81)
Bureau of Reclamation

BUREAU OF RECLAMATION

OFFICIAL FILE COPY		
DATE	SURNAME	CODE
1/15/86	[illegible]	420
1/15	Briggs	400
		105
		100

JAN 16 1986

LC-420

720.

Memorandum

To: State Director, Arizona State Office, Bureau of Land Management, P.O. Box 16563, Phoenix, Arizona 85011
Attention: Withdrawal Review Coordinator

From: Acting Regional Director

Subject: Review of Bureau of Reclamation Withdrawal for the Charleston Dam and Reservoir, Central Arizona Project (our memorandum of March 2, 1984)

The subject memorandum transmitted our withdrawal review of the land reserved for the proposed Charleston Dam and Reservoir, Central Arizona Project, as mandated by Section 204(1) of the Federal Land Policy and Management Act of October 21, 1976 (90 Stat. 2754). As a result of a Bureau of Land Management determination that the rejustification contained in the review was insufficient to warrant modification and continuation of the withdrawal order (Public Land Order No. 5269), a meeting was held in your office on June 25, 1985. During that meeting, it was agreed that the Bureau of Reclamation would reevaluate its need to retain all of the land withdrawn by the withdrawal order, particularly those parcels that would not be subject to inundation by the reservoir.

We have completed our reevaluation and determined that certain land can be relinquished. Accordingly, it is requested that the withdrawal review report be amended as follows:

I. Delete from the listing to be retained the following described land:

Gila and Salt River Meridian, Arizona

T. 21 S., R. 22 E.
section 5, lots 1 and 2, NW¼SE¼, S½SE¼
section 9, S½NW¼
section 33, lot 1, NE¼, E½NW¼

T. 22 S., R. 22 E.,
section 4, lot 11, lots 23 to 33, inclusive, lots 36, 39, 40, 45, 46, 50, 57, 59, 62, and 63, lots 67 to 70, inclusive, lots 72, 73, 76, and 77 lots 82 to 85, inclusive, lots 87 to 90, inclusive lots 93 to 103, inclusive

section 9, lots 1 to 4, inclusive, E½NE¼

Containing 592.75 acres in Cochise County, Arizona.

7-1596A (2-78)
Bureau of Reclamation

II. Add a new listing identified for relinquishment to include all of the land included in I. above. The information required by (43 CFR 2372.1(b)) is listed below:

1. Bureau of Reclamation, Lower Colorado Regional Office, P.O. Box 427, Boulder City, Nevada 89005
2. Public Land Order dated October 11, 1972.
3. See 1. above.
4. None.
5. There is no known contamination of the land.
6. Not applicable.
7. None.
8. None.
9. Not applicable.
10. No easements or other rights have been granted by the Bureau of Reclamation.
11. None.
12. None.
13. None.

ROY D. GEAR

cc: General Services Administration, Region 9, Real Property Division, Federal Property Resources Service, 525 Market Street, San Francisco, California 94105
District Manager, Safford District Office, Bureau of Land Management, 425 East Fourth Street, Safford, Arizona 85546

bc: Project Manager, Phoenix, Arizona, Attention: 330-1090

401
405-Chrono-424A/L2
Daily

RChualey: lm

GPO 876-469

121

GRAHAM COUNTY BOARD OF SUPERVISORS
GRAHAM COUNTY COURTHOUSE 800 MAIN STREET PHONE 428-3250
SAFFORD, ARIZONA 85546

SUPERVISORS
DELBERT HOUSEHOLDER, CHAIRMAN
REX BARNEY, MEMBER
MILTON REAY, MEMBER

JOE CARTER, COUNTY MANAGER
BARBARA FELIX, CLERK

April 16, 1990

Ray Brady
District Manager
Bureau of Land Management
425 E. 4th St.
Safford, Arizona 85546

RE: Draft BLM Management Plan

Dear Mr. Brady: Ray

Enclosed for your consideration is a copy of Resolution 1990-10 outlining the Board's position with respect to the removal of grazing acreage. Please consider this position as the Board's comment in this matter.

Sincerely,

Joe

Joe Carter, Manager
Graham County

/sh

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

RESOLUTION

1990-10

A RESOLUTION OF THE GRAHAM COUNTY BOARD OF SUPERVISORS IN OPPOSITION TO THE BUREAU OF LAND MANAGEMENT PROPOSAL TO WITHDRAW ADDITIONAL GRAZING LAND ACREAGE.

WHEREAS, the economic survival of rural counties and communities is dependent upon private lands as its primary tax base, and

WHEREAS, private lands within Graham County consist of less than seven percent of total land ownership, and

WHEREAS, a substantial portion of tax revenues are derived from personal property taxation on livestock, etc.. on public lands, and

WHEREAS, the proposed Bureau of Land Management draft plan, preferred alternative, calls for the additional withdrawal of twenty-three thousand acres (Swamp Spring/Hot Spring area) from possible future use for livestock grazing, and

WHEREAS, such withdrawals create financial hardships on retail trades and sales, businesses which support ranching, along with additional hardships on local governments in meeting- their responsibilities to provide minimum basic services.

NOW THEREFORE BE IT RESOLVED, that the Graham County Board of Supervisors is opposed to any additional withdrawal of land which has a direct negative impact on taxation.

PASSED AND ADOPTED by the Board of Supervisors of Graham County this 16th day of April, 1990.

GRAHAM COUNTY BOARD OF SUPERVISORS

Delbert Householder

Delbert Householder, Chairman

ATTEST:

Barbara Felix

Barbara Felix, Board/Clerk

122

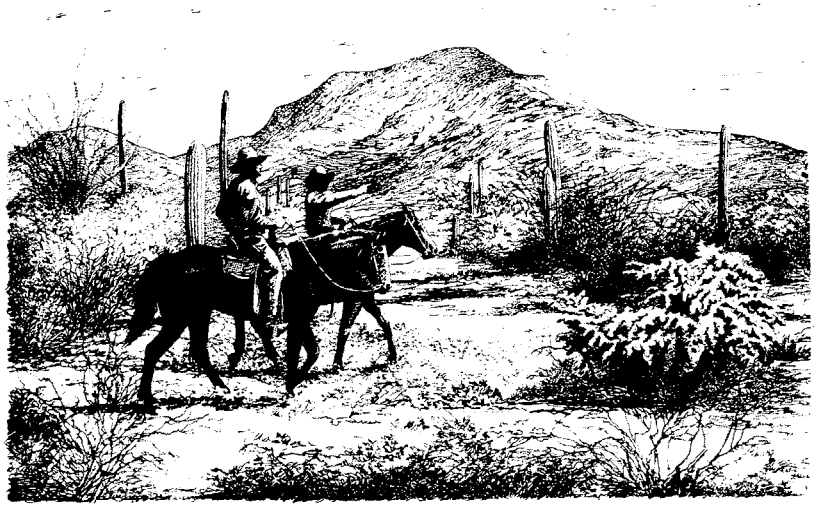
PETITION

TO: Bureau of Land Management
U.S. Department of the Interior
425 E. 4th Street
Safford. A2 85546

RE: Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS)

THIS PETITION is in regard to the use of the high country above Aravaipa Canyon. We request that you do not open the road across Virgus Canyon. The area west of Virgus should be open to equestrian and foot travel only. At present, there are many 4-wheel drive roads in the Turkey Creek-Table Mountain area. There is a need for equestrian trails outside of the Aravaipa Creek itself and horses and ORVs are a dangerous combination.

NAME	ADDRESS		DATE
Patricia A Rivain	2120 N Fair Oaks	Tucson Az 85712	4/6/90
Dick G. Korich	5825 E. Hawthorne	Tucson Az 85711	4-4-90
Nancy Costanza	6934 N. Northpoint Dr.	Tucson Az 85741	4-4-90
Emily Gyorch	129 E. 1st ST	Tucson, Az 85705	4-4-90
D.C. Weston	416 E. Lester ST	Tucson, Az 85705	4-4-90
[illegible]	2216 E. Waverly ST	Tucson Az 85719	4-4-90
Lisa Lattard	2350 E Water #C-206	Tucson Az 85719	040490
Karen Josephson	3244 C Cerda St	Tucson Az 85716	4-5-90
Patricia Dunstan	3810 W. Mossman Rd	Tucson Az 85746	4-5-90
Lorna Carrolla	8220 E. Kanyon Dr.	Tucson Az 85710	4/5/90
Tim Strauch	1 E River Rd #1910	Tucson Az 85704	4/5/90
Morteza Nakhforoosh	1901 N. Wilmot #109T	Tucson, Az 85712	4-5-90
Moussar T. Yahya	2221 E. 6th Street	Tucson, Az 85719	4-5-90
[illegible]	2724 E. Linden	Tucson, Az 85716	4-5-90
Geronimo Rodriguez	1231 E. Illinois St	Tucson, Az. 85714	4-5-90
[illegible]	5321 E. Linden	Tucson, Az 85716	4/5/90
Virginia Findley	1304 N. Euclid Ave	Tucson, Az 85719	4/5/90
Prakash Nair	6161 E. Grant #937	Tucson Az 85712	4/5/90
[illegible]	742 VE. Speedway Blvd	Tucson Az 85710	4/5/90
Patti Parker	7361 E. 24th St	Tucson, Az 85710	4/5/90
C. [illegible]	1525 N Euclid #126	Tucson, Az 85719	5Apr90



123

THE SAN CARLOS APACHE TRIBE

P.O. BOX 0
SAN CARLOS, ARIZONA 85550

(602) 475-2361

Buck Kitcheyan
Tribal Chairman

Ronald Edwards
Tribal Vice Chairman

April 18, 1990

Mr. Ray A. Brady, Safford District Manager
Bureau of Land Management
Safford District
425 R. 4th Street
Safford, AZ 85546

Dear

I have a growing concern that your office does not have an adequate understanding of the Federal/Indian trust relationship, th. BLM's responsibility stemming from this relationship, and how this responsibility relates to the Safford District Resource Management Plan (RMP). This concern upon the presentation by your staff and subsequent discussion of the draft the Natural Resources Committee of the San Carlo. Apache Tribe. As discussed in my previous letter, the trust relationship is government-to-government and is not of the Bureau of India" Affair.. It 1. the Department of th. Interior which is charged with th. responsibility of upholding including th. Bureau of Land Management where its management affects the fiduciary responsibility of the Federal government toward trust land. and resources of Native Americans. As this relationship is complex and oft." poorly understood by agencies inexperienced 1" this field, I ha". enclosed a packet of documentation on this topic for your review.

The first two documents are from a Federal District court case in which the Northern Cheyenne Trlb. sought a judicial review of the the Bureau of Land Management's trust responsibilities. The finding. 1" this case clearly indicate that the trust responsibility of th. Federal government born. by th. Bureau of Land Management.

The third and fourth documents state th. position of the Secretary of the Interior. In Secretary Lujan's speech before the Senate Select Committee on Indian Affairs he stated that th. Federal trust responsibility to Indians was the Department's "most serious responsibility." this commitment in hi. memorandum to all th. Department bureaus by requesting the consideration of the trust responsibility when conducting all program operations.

Th. final document was distributed (during a recent intertribal symposium) by J. Penfold, Assistant Director, Resources, Bureau Management, during . presentation Opportunities It is an advance copy Of BLM manual 8160, "Native American Coordination and Consultation." This document gives clear direction to District staff, concerning their responsibility for identifying and fully considering Native American issues during th. planning processes.

I believe that you will find the.. documents informative and a good starting point for further research into a quickly evolving policy within your agency.

Sincerely,

Buck

Apache Tribe

cc: Barber, Phoenix Area Director, RIA
Mr. All." Anspach, Superintendent, se" Carlos Agency, BIA
Mr. Lynn Engdahl, Acting Arizona Stat. Director, BLM

124

HUACHUCA AUDUBON SOCIETY
POST OFFICE BOX 63 SIERRA VISTA, ARIZONA 85636

1 May 1990

U.S Department of the Interior
Bureau of Land Management
Safford District Office
425 E. 4th Street
Safford, AZ. 85546

Dear Steve Knox:

On behalf of the 300-member Huachuca Audubon Society, I would like to thank the Bureau of Land Management for this opportunity to make comment on the Draft Resource Management Plan EIS for the Safford District. Our previous efforts an the San Pedro River management plan proved to be quite rewarding, and we are looking forward to having similar satisfaction with this District Plan.

To begin with, we basically support Alternative A, but would like to see modifications on the following concerns:

Issue 1. Access: Any road access in riparian areas should run parallel to stream flow and not in it. All crossings through riparian areas should be at right angles to stream flow, thereby keeping people from driving up and down the stream. Close off or avoid developing any switchback road access in all riparian areas. The following roads should be moved out of riparian areas: Virgus Canyon Road, left fork of Markham Creek Road, and Guadalupe Canyon Road.

Issue 2. ACEC's: We support Alternative B's Issue 2. All ACEC's should have class I VRM designation. and all new land acquisitions should be considered for ACEC designation. We also support NCA status for the Gila Box.

124-1 Issue 3. Off-Highway Vehicles: Alternative A. but suggest the following additions: Seasonal closures during nesting or breeding seasons in all sensitive areas for wildlife, for example near riparian areas.

Issue 4. Riparian Areas: The Bureau should consider

Issue 4. Riparian Areas con't:

establishing a buffer zone around all ACEC's, NCA's, and riparian areas where Animal Damage Control (ADC) efforts would be prohibited. To allow ADC to trap next to these protected areas would have a negative impact on the resources these areas were established to protect. We would also like more emphasis put on management of E species in riparian areas and less on livestock grazing. We congratulate the removal of cows from the San Pedro Riparian National Conservation Area and encourage the same policy in the following riparian habitat: Muleshoe, Aravaipa, Bonita Creek, San Francisco River Area, Gila Box, Gila River Area, Apache Box, Turkey Creek, Guadalupe Canyon, and other significant riparian areas in the Safford District. We also encourage no Administration site development on the San Pedro Riparian National Conservation Area, but,rather, would support a site development in Sierra Vista.

Management concern 2. Lands and Reality: We support Alternative B. The Swisshelm Mt. area, Portal area, and other sky islands serving as wildlife corridors should not be traded off for any less valuable lands for wildlife. Any land exchanges should be carefully assessed as to their impacts on wildlife, including migration routes.

Management concern 4. Energy and Minerals: We support Alternative B because it provides greater protection to sensitive areas from mining disturbance.

Management concern 6. Soil Erosion: We encourage building the Timber Draw Dam on the San Simon River because it would greatly reduce soil erosion and improve riparian habitat. We also encourage livestock removal from this area to facilatate vegetation regrowth.

We strongly urge you to incorporate our comments into the final Safford District RMP Plan, and we thank you for your consideration.

Sincerely,

Marty Cordano

Marty Cordano
President

125

Ken Cox, Sr.

CUSTOM MADE JEWELRY BY APPOINTMENT ONLY

1383 S. 1st Avenue
PHONE (602) 428 6980
THATCHER, ARIZONA 85552

May 8, 1990

Mr. Brady
Safford District - B.L.M.

425 East 4th Street
Safford, Az. 05546

Subject: District Management Plan

Dear Mr. Brady:

125-1 As an active member of our local gem and mineral club and the Graham County Chamber of Commerce, I would like to propose that you include in your new management plan a plan for ripping up (by bulldozer and ripper) a trial plot of one or two acres at the Black Hills fire agate bed and at the Round Mountain fire agate bed.

This would facilitate the finding of more and better material by the public; as these areas have been picked over for many years.

In mind a process that to by the state of Arkansas at their diamond mine at Murphriesboro Ark. This could be accomplished little (or perhaps to the Bureau of Land Management by donations of machinery and labor by County Chamber

125-2 I would also like to propose that another public rockhound area be established near the Graham - Greenlee County highway 70 east of Safford.

I have walked over a portion of that ground with two men from your office and they were impressed to say the least. Small geodes, agate nodules, and Quartz chrystals are quite plentifull over a wide area there. as rockhounding is growing quite rapidly it would be a boone tp the area, and it would be very good public relations for the B.L.M.

You could also count on cooperation from the Gila Valley Gem and Mineral Society in the form of helping police the area, as well as building bases for trash barrels and, perhaps collecting and emptying the trash containers.

I will greatly appreciate any help you could give to this matter.

Respectfully,

Kenneth D. Cox Sr.

Kenneth D. Cox Sr.

126

COCAISE-GRAHAM CATTLE GROWERS' ASSOCIATION

RESOLUTION

1990-

WHEREAS. the economic survival of each rural community and county in the state depends on private Property as a tax base: and

WHEREAS. further taxes for and communities are derived from personal property tax on livestock: and.

WHEREAS. the current Bureau of Land Management Resource Management Plan Draft <preferred alternative> proposes to withdraw 22.883 acres from use grazing. thus impairing and reducing the tax base of Graham and Cochise Counties: and.

WHEREAS. the current plan specifically states that private lands are to be acquired from time to time for various reasons which further would reduce the tax base.

THEREFORE. BE IT RESOLVED, the Cochise-Graham Cattle Growers' Association is opposed to the current proposed Resource Management Plan to withdraw grazing rights on Swamp-Springs-Hot Springs watershed Area of Critical Environmental Concern, better known as the Muleshoe Allotment.

BE IT FURTHER RESOLVED, the Cochise-Graham Cattle Growers' Association is opposed to any accumulation of private or state lands by the federal government that would affect the tax base in Graham and Cochise Counties.

ADOPTED THIS 21st day of April. 1990 by unanimous vote of the members of the Cochise-Graham Cattle Growers' Association.

127

127-1

Dear Director Brady:

I would just like to take a minute of your time to express my concern on the issue of the Mexican Gray wolf.

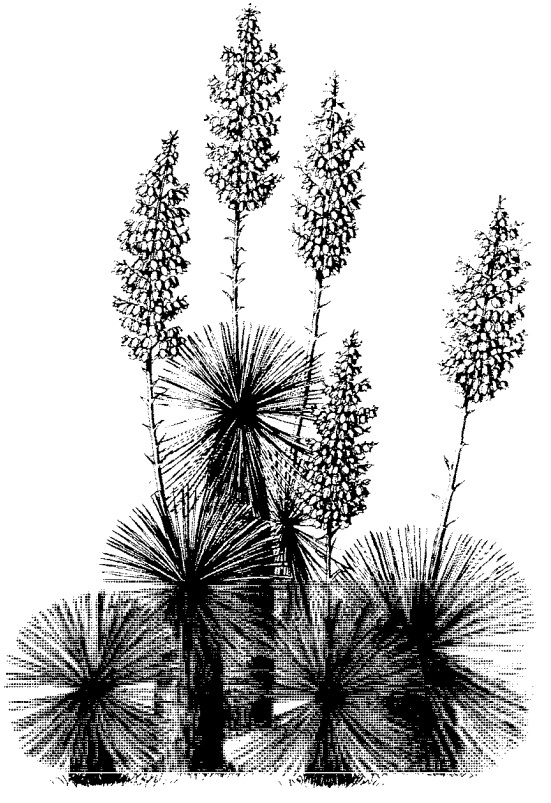
I would like to ask that the BLM please begin de-stocking wolf habitat in the Safford District so that wolf-cow conflicts can be avoided.

In a similar message to Coronado Supervisor Abbott, I asked him to please begin preparing the forest for the re-introduction of the wolf. I would urge you to please do the same so that these lands would be ready for the wolf at the appropriate time and thus avoid conflict with livestock.

I hope you can concur with me on the importance of this issue. Thank you,

Sincerely,

John Pampeni



128

District Manager
Stafford BLM
Stafford, AZ.

April 16, 1990

Dear District Manager:

I am writing out of frustration and I don't really think it will make any difference in the end. However, I once again visited the Stafford District and was appalled by the ecological damage done by livestock. I spent time in the Gila Box area including Eagle Creek, Bonita Creek, San Francisco River and the main river valley as well as on ridges. Everywhere there were beat out riparian areas. Little or no cottonwood reproduction. Dust. Sand. Trampled banks. Trampled vegetation. Cow shit everywhere. It's a disgrace. And for what?

And please spare me that crap about producing food for the Nation and all that BS. We both know that amount of meat produced on public lands is minisule. I know and I hope you know that in the Southwest the land would be much better without cows on it. And we really add up the ecological costs of grazing there would be no way to justify it.

How can you look yourself in the mirror knowing that you're supposed to be protecting the public trust and the public's land. Is this how you protect it? IS destroying riparian zone5 how you protect it? And please don't tell me that if the public would in a little more you could build more fences and spread the range maggots out. How about getting the range maggot ranchers to pay for it all if they want to ruin the public's lands? Pay for all that fencing, and even the cost of adminstration of the grazing allotments in the first place?

I also went up to the Needle's Eye Wilderness in the Gila Mts. and some fat slob of a rancher blocked the road with his big gas guzzling cow shit smeared truck on the public road-- and he tried to tell me that it was his land. "You're on my range" he said. And I said; "funny I thought I was on public lands" and I got out my BLM map. But he knew his bluff was up and he said he didn't believe in maps.

The only wonderful thing about this trip is that I got to visit Aravaipa Canyon where there are no range maggots and it was absolutely wonderful. It lets a person see what that landscape is supposed to look out-- if you did the job you are paid to do. Instead of being a lanky to the livestock industry, the Gila Box. Bonita Creek, the San Francisco River-- they would all resemble Aravaipa Canyon in time.

Yes this letter is insulting. It's meant to be. For I am sick and tire of seeing the public trust compromised. I am tire of seeing the American landscape destroyed and the agency charged

with protecting the American interest refusing to live up to their mandate.

Your recent Draft Management Plan refused to consider grazing even though one part of the district had not been reviewed in 12 years!! The law only says you have to consider grazing by domestic livestock (an alien species) as one potential use-- it's not imply that you have to graze livestock. And there far too many places that should have no cows what so ever.

I doubt you'll bother to answer and that's fine. I just hope you feel guilty about taking your pay check home each week knowing that you allow this to happen.

Get the cows off and bring back the cottonwood.

George Wuerthner
Box 273
Livingston, Mt. 59047

129

Maricopa Audubon Society
4619 EAST ARCADIA LANE • PHOENIX, ARIZONA 85018

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Dick Todd, Vice President
Alison McGowen, Secretary
Herbert S. Foel, Treasurer

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Elaine Meyer, Programs
Elizabeth N. Hatcher, Membership
Marian Eubanks, Education
Anthony B. Anthony, Publicity
Ken Smith, Editor

May 10, 1990

Steve Knox
US Dept. of the Interior
BLM- Safford District Office
425 E. 4th St.
Safford AZ 85546

Dear Sir:

The Maricopa Audubon Society and its 3000 members enthusiastically support Alternative A, but with the following suggestions:

Issue 1- Access: Any road access in riparian areas should run parallel to stream flow and not in it. All crossings through riparian areas should be at right angles to stream flow, thereby keeping people from driving up and down the stream. Close off or avoid developing switchbacks accessing riparian areas. Remove roads from riparian areas at Virgus Canyon Rd., left fork of Markham Creek Rd., and Guadalupe Canyon Rd.

Issue 2- Access: ACEC's: We support Alt. B's Issue 2. All ACEC's should have class I VRM designation, and all new land acquisitions should be considered for ACEC designation. Also we support National Conservation Area status for the Gila Box.

129-1 Issue 3- Off Hwy Vehicles: We support Alt. A, but suggest the following additions: Seasonal closures during nesting or breeding seasons in all sensitive areas for wildlife, for example near riparian areas.

129-2 Issue 4- Riparian Areas: Establish buffers around all ACEC's, NCA's, and riparian areas where Animal Damage Control efforts would be disallowed. Let us protect the wildlife in its more natural state in these environmentally important areas. Threatened and Endangered species should have more emphasis and less emphasis on livestock grazing. Our membership finds the grazing removal in San Pedro riparian area a great leap forward in the protection of such ecologically sensitive desert riparian areas and hope this will occur at Muleshoe, Aravaipa, Bonita Creek, San Francisco River Area, Gila Box, Gila River Area, Apache Box, Turkey Creek, Guadalupe Canyon and other key riparian treasure troves in the Safford District. We also encourage no Administration site development on the San Pedro Riparian National Conservation Area, but rather, would support a site development in Sierra Vista.

DEDICATED TO THE PROTECTION OF NATURAL WETLANDS IN AN ARID ENVIRONMENT

Management Cocnern 2- Lands and Reality: We support alt. B. The Swisshelm Mt. area, and other sky islands serving as wildlife corridors should not be traded off for any less valuable lands for wildlife. Any land exchanges should be carefully assessed as to their impacts on wildlife, including migration routes.

Management Concern 4- Energy and Minerals: Alt. B is desirable because it provides greater protection to sensitive areas from mining disturbance.

Lastly, we encourage Timber Draw Dam to reduce soil erosion and improve riparian habitat. we encourage removal of livestock from this area to facilitate vegetation renewal.

Thank you *or considering our recommendations for the final Safford District RMP Plan.

Sincerely,

Robert A. Witzeman M.D., Conservation Chairperson
MARICOPA AUDUBON SOCIETY

130

12 Marshall Street
Boston, Massachusetts
02108 (617) 523-2313
Fax (617) 523-2365
1-800-648-7695

Philip Y. DeNormandie

Nay 9, 1990

A. Brady
District Manager
United States Department of the Interior
Bureau of Land Management
Safford District Office
425 E.
Safford, Arizona 85546

Dear Mr. Brady:

As the owner of Trails End Ranch, The Painted Cave allotment and other properties in the RMP area I have the following concerns and suggestions.

The area north of the Aravaipa Canyon but South of the San Carlos India" Reservation is a long narrow property that drains into Aravaipa Creek. The area controlled by the BLM in this area is primarily The Painted Cave allotment owned by me and the Dry Camp allotment.

130-1 I have two means of access to The Painted Cave allotment, the primary one is through my Whittaker Property known as the Whittaker Ranch Road T6S R17E Sec. 17, 19, 20. Presently I allow vehicles over this road under a sign in sign out program totally at my descrection. Under no circumstances do I want unlimited and uncontrolled access by right. To date vandalism is minimal but trash continues to be a major problem also vehicles during wet periods do considerable damage to the roads. I also think vehicular access beyond The Painted Cave should be limited to ranch and BLM vehicles.

My second access is the Wagner Ranch Road T6S, R17E Sec. 23 and 24. This road is private, goes directly through my front yard, holding pens and ranch buildings and under no circumstances do I allow anyone other than BLM vehicles to travel over this road. Given my approach to the Wittaker Road no one has see" any need to utilize this access and I see no reason to open it to the public.

In general the area to the North of Aravaipa Canyon is extremely small and fragile and no roads should be opened up into this area beyond the limited access that presently exists. Hunting should be encouraged by foot or horseback and the same for hiking. This would greatly improve the enjoyment of this area for most of the people utilizing this small area while also protecting the environment for the small population of Desert Big Horn Sheep that traverses this area between Hell Hole and Bradenburg Mountain.

All opportunities for mining on the Dry Camp and Painted Cave allotment should be with&awn. This would assure protection of the Aravaipa drainage, protect the Big Horn Sheep terrain and assure the public of a continued unique environment that is extremely close to major mining operations at San Manuel, Winkleman and Dudleyville.

OHV's should not be allowed in this environmentally sensitive area, except with Landowner permission on the North Rim and all vehicles should be eliminated on South Rim property controlled by Nature Conservancy.

Grazing should be allowed under present permits on Painted Cave and Dry Camp. The cattle and sheep have gotten along successfully for many years. It is my understanding The Nature Conservancy wants to withdraw grazing on their leases which means grazing in the total Aravaipa Canyon area will be highly limited and its impact minimal.

Expansion of Wilderness: I have no objections to the expansion of the Wilderness area as proposed.

The Painted Cave homestead is a unique and historic property. The BLM should make sure that the lessee properly secures and maintains this property. The road down to Painted Cave should be kept lacked with only Ranch and BLM vehicular access.

Page Three

The Aravaipa area is a unique area and as such it cannot be all things to all people. The heart of this area is the Aravaipa Wilderness, the immediate surrounding areas north to the Reservation and South over the Nature Conservancy and East to Deer Creek should be looked at as support areas. Vehicles should be limited, hunting should be by foot and no new or closed roads should be opened up. This generally maintains the present situation and acknowledges the increasing role that passive recreation (non vehicular) is playing in the area. In keeping vehicles limited, this area become recreational area for hiking, hunting and camping in a non-wilderness area, while many uses for vehicular recreation exist in the remainder of the resource management area.

Thank you.

Sincerely,.

Philip

PYD/fm

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131

Ms. Jodi Rolls
P.O. box 4724
Apache Junction,
Az. 85278

May 16, 1990

RECEIVED
BUREAU OF LAND MANAGEMENT
MAY 17 1990
SAFFORD DISTRICT
ACTION | INFO | INITIAL | DATE
DIST MGR
A.D.
A.E.C.
AREA MGR
ADMIN
OPERS
SILA
SAN SIMON
DISCARD

Mr. Ray Brady, Director Safford District
Bureau of Land Management
425 E. 4th St.
Safford, Az. 85546

Dear Mr. Brady,

131-1 I am writing this letter to urge the BLM to begin destocking wolf habitat in the Safford District so that wolf-cow conflicts can be avoided when the mexican Grey wolf is reintroduced to Az.

I understand that the Safford Resource Management plan (RMP) is receiving comments until June 6. This seems to be an ideal mechanism through which we can begin to look at clearing the wolf's former S.E. Arizona range of cattle to avoid livestock conflicts.

Thankyou for your valuable help with this important project.

Sincerely yours,
Concerned citizen
Jodi Rolls

132

ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.
P.O. Box 5241 · 85010

May 20.1990

Mr. Steve Knox
RMP Leader
Safford District
Bureau of Land Managment
425 East 4th Street
Safford, Arizona 65546

Re: Draft Safford District Resource Management Plan
and Environmental Impact Statement

Dear Mr. Knox:

The Arizona Desert Bighorn Sheep Society, has reviewed the above referenced document. Please include the following comments as part of the official public record.

The primary concern of the *ADBSS* is the management and viability of desert bighorn sheep. Although we will address comments to the wildlife portion of the plan, we are interested in other portions because of their bearing on bighorn sheep management.

ISSUE 1 • ACCESS

ADBSS supports the preferred alternative action of obtaining public and administrative access to the public lands. We feel this is important for wildlife management functions as well as hunting.

We support obtaining legal access for those locations listed in Appendix 1 which provide access to bighorn sheep habitat.

We support the reconstruction of the Virgus Canyon Road and the East Turkey Creek Road to provide vehicle access for desert bighorn sheep management and hunting.

We support obtaining legal access for the Aravaipa Canyon Wilderness Trail from the west trailhead to the west boundary of the wilderness.

ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.
P.O. Box 5241 • Phoenix, Arizona 85010

ISSUE 2 • ACECs AND OTHER TYPES OF SPECIAL MANAGEMENT

The Gila Box ONA-ACEC, Turkey Creek Riparian ACEC, Swamp Springs Hot Springs Watershed ACEC and Peloncillo Mountains ONA-ACECs all list bighorn sheep as one of their values. One of the management prescriptions common to all of these is the limitation of off highway vehicle use If limitations means closing existing roads and trails to vehicle use, we cannot support it.

132-1 Aravaipa Canyon and Galiuro Wilderness additions are recommended as suitable for inclusion- in the National Wilderness Preservation System. ADBSS *does not* favor recommendation of or inclusion of these lands into wilderness clasificatian unless certain specific language is contained in the legislation designating these areas as wilderness. The specific language we would request relates to use of minimum tools in the forms of aircraft, motor vehicles, and hand held power tools. This equipment is absolutely essential to conduct the activities necessary in modern wildlife management. These activities are surveys. captures, transplants, waterhole construction and maintenance, and scientific study. The language for both the Interim Wilderness Guidelines and Wilderness Policy leave too much discretion to the manager to interpret use of minimum tool.

ISSUE 3 • OFF HIGHWAY VEHICLES

ADBSS is concerned about proposed closure of Oak Grove Canyon, above the Oak Grove Canyon Corral, for closure to off highway vehicle use We would prefer to see the closure changed to limited use.

We *support* designation of bighorn sheep lambing areas as "limited" to off highway vehicle use from May 1 to January 31, and dosed to vehicle use from February 1 to April 30.

132-2 We are surprised at the recommendation to include mountain bikes and other forms of mechanized transportation with off highway vehicle designations. What is the basis for such an inclusion? Unless resource damage, such as soil erosion, can be attributed to mountain bikes, why should they be restricted?

ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.

P.O. Box 5241 • Phoenix, Arizona 85010

MANAGEMENT CONCERN 1 • WILDLIFE HABITAT

ADBSS supports the establishment of both Desert and Rocky Mountain bighorn sheep as priority species and their habitats as priority habitats.

132-3 Managing habitat for optimum wildlife populations based on ecological conditions is a laudable goal. We are not sure what "optimum wildlife populations" are. It is not defined in the glossary. We *do support* the concept of managing. any wildlife species within the capabilities of the habitat.

ADBSS supports transplanting and augmenting populations of priority wildlife species, if necessary, to reach management objectives. Given the recent die off of bighorn sheep in Aravaipa Canyon, transplants could serve as important tools in sustaining a populatiion which has fallen below its potential.

In designating ACECs for species attention should be paid to limiting off highway vehicle use. As we commented earlier, we would limit vehicle use to existing roads end trails rather than close these areas to vehicle use.

MANAGEMENT ***CONCERN 4 - ENERGY AND MINERALS***

ADBSS supports conditions for energy *and* other leaseable minerals which would not allow surface occupancy in established bighorn sheep lambing areas from February 1 to April 30 each year.

Thank-you for the opportunity to comment on this plan.

Sincerely,

Pete Cimellaro, Chairman
ADBSS Legislation Committee

133

Bat Conservation International, Inc.

Box 162603 • Austin, Texas 78716 • 512/327-9721

Founder and Executive Director
Dr. Merlin D. Tuttle

Honorary Trustees
Gilbert M. Grosvenor
Dr. S. Dillon Ripley
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West Germany
Dr. Uwe Schmidt

May 20, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Knox:

Bat Conservation International was delighted to learn that BLM is interested in protecting Eagle Creek Cave and the remnant population of *Tadarida brasiliensis* that resides there. We are particularly concerned about this cave because in the early 1960's, it housed the world's largest known bat colony - approximately 30 million Mexican free-tailed bats. The 99.9% decline in this population in just six years is one of the most severe conservation losses in modern history. The loss exemplifies the high vulnerability of cave bat populations.

We would like to support the BLM efforts to protect and manage this important cave as an Area of Critical Environmental Concern. We strongly recommend *Alternative B* as described in the ACEC evaluations. This would facilitate controlling access to the cave as well as protecting other important natural and cultural resources of Eagle Creek Canyon.

We would also like to offer our assistance with BLM's efforts to protect this cave. BCI has worked with the U.S. Fish and Wildlife Service and The Nature Conservancy on their cave protection efforts. In particular, we would like to assist with the education and management endeavors. We have found that well-designed and informative conservation messages help gain public support, which is essential to the success of cave and bat protection projects.

Again, we applaud your efforts on behalf of Eagle Creek Cave. I've enclosed our recent prospectus, which may help with your negotiations to protect the cave. Please keep us posted about your progress and when we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Gary L. Graham
Associate Science Director

Bat Conservation International is supported by tax deductible contributions used for public education, research and conservation of threatened and endangered bats.
Printed on Recycled Paper

134

WILLIAM
Attorney at Law
3444 N. Country Club Rd.
Tucson, Arizona 85716
(602) 327-4787

May 24, 1990

Meg Jensen
Gila Resource Manager
Bureau of Land Management
425 E. Fourth Street
Safford, Arizona 85546

RE: RESOURCE MANAGEMENT PLAN--SOZA MESA

Dear Meg:

As I indicated in my telephone conversation, I was appointed as the successor conservator of the estate of Hope I. Jones and Letters of Conservatorship were issued to me on May 15, 1990. I am enclosing a copy of those Letters for reference purposes.

One of the assets of the conservatorship is the C-Spear Ranch. As you will recall, Johnny Lavin and I met and Bill Brandall at the ranch last summer to discuss house located on C-Spear Ranch property in Redfield Canyon

On Behalf of the C-Spear Ranch, we are definitely in support of a resource management plan which would result in the return of the land to grazing land. Further, we would be interested in being the lessee of that land when it became available to lease, or we would also he interested in being the operator of such leased acreage.

We would appreciate it if you could take note of our interest in this land and keep us informed as or when any progress in this matter occurs.

Sincerely,

William S. Atlee

WILLIAM S. ATLEE

WSA/pa

cc: Johnny Lavin

ARIZONA SUPERIOR COURT, PIMA COUNTY

In the Matter of the ~~Guardianship~~/Conservatorship of HOPE I. JONES, ~~Incapacitated~~ Protected Person	NO. 35625 LETTERS AND ACCEPTANCE __ GUARDIANSHIP OF AN INCAPACITATED PERSON X CONSERVATORSHIP FOR A PROTECTED PERSON (SUCCESSOR) COURT APPOINTMENT	FILED JAMES N. CORBETT CLERK, SUPERIOR COURT 90 MAY 15 PM 3:25

ISSUANCE OF LETTERS

WILLIAM S. ATLEE is hereby appointed

__ guardian of the person of
(SUCCESSOR) X conservator of the estate of HOPE I. JONES,
__ a protected person

pursuant to Court Appointment, but shall not exercise the following powers without prior order of the Court: NO RESTRICTIONS

JAMES N. CORBETT

WITNESS: May 15, 1990

CLERK OF THE SUPERIOR COURT
By Donald E. Sterling
Deputy Clerk

SEAL

ACCEPTANCE

STATE OF ARIZONA)
) SS:
COUNTY OF PIMA)

I hereby accept the duties of SUCCESSOR ~~Guardian~~ conservator of the estate of the above-named protected person, and do solemnly swear that I will perform, according to law, such duties.

William S. Atlee
~~Guardian~~/Conservator
WILLIAM S. ATLEE

SUBSCRIBED AND SWORN TO before me on May 14, 1990

Holly S. McKibben
Deputy Clerk/Notary Public

My Commission Expires: May 31, 1991

ATTORNEY'S NAME, ADDRESS, PHONE
Philip Hawley Smith
Jones, Edwards, Smith & Kofron, P.C.
P. O. Box 13326
Tucson, Arizona 85732-3326
(602) 747-4500

COMPUTER No. 53988

STATE OF ARIZONA } ss
COUNTY OF PIMA }
The foregoing instrument is a full, true, and correct copy of the original on file in this office. Letters issued on MAY 15 19 90 and said Letters have not been revoked.
May 15 19 90
JAMES N. CORBETT, CLERK
By Donald E. Sterling
Deputy Clerk

G-3

135

Steve
Bureau o f Land Management
Safford, A.? 85546

my 23, 1990

Dear Mr. Knox:

The Bisbee Women's Action Group. which Includes a network of approximately 200 people. wishes to express our interest in the Bureau of Land Management's Resource Management Plan.

We prefer Alternative "B" as It shows the most protection towards and the wisest "se of the public lands.

The following Is a list of suggestions to apply to the Issues covering Alternative "B" or whichever alternative Is selected.

135-1 Issue I, Access: Road access In Riparian Areas should run parallel to stream flow and not In It. Crossings through Riparian Areas should right angles to stream flow to prevent people from driving In the streams. Remove these roads from Riparian Areas: Virgus Canyon, Guadalupe Canyon and left fork of Markham Creek Road.

135-2 Issue 2, ACEC's: All ACEC's should have Class I VRM designation. This affords more protection for these critical areas.

135-3 Issue 3 , OHV's: All sensitive Areas should be closed Completely to OHV "se. or at least during nesting seasons.

135-4 Issue 4. Riparian Areas: Establish a "buffer zone" around Riparian Areas, NCA's and ACEC's which prohibits Animal Damage Control. The use of ADC near Such areas completely negates the protection Of the resources that these areas were established to protect.

Our group. and we believe the public in general, Is outraged at the destruction of our caused by ADC.

(2)

Issue 4 . continued: We congratulate you on of livestock from the San Pedro and encourage the same policy for these areas: Muleshoe, Aravaipa, Bonita Creek, San Francisco River Area, Gila Box. Gila River Area. Apache Box, Turkey Creek, Guadalupe Canyon and other significant Riparian Areas.

According to the U. S. Government's General Accounting Office Report on Rangeland Management of June. 1988, the key factor In restoration of Riparian Areas Is the removal of livestock.

135-5 We also suggest no development of the San Pedro. An administration building can be put In thereby drawing more tourism t o Interpretive displays can be put inside the already existing building at the San Pedro, leaving the landscope untampered with and in Its natural beauty for future generat Ions. to enjoy.

135-6 Management Concern 2, Lands Any land exchanges such as trading the Swisshelms, Portal Areas, or other sky Islands should have the consideration of the Impacts on wildlife and their migratory routes as a priority. Only exchange these areas with agencies who practice natural resource conservation management primary ethic and concern.

Management Concern 6. Soil Erosion: We support building the dam on the San Simon because it would help reduce soil eros ion. We strongly encourage removal of livestock from this area so that the land ha= to recover. Livestock caouses sail erosion by compacting the earth so that It cannot absorb water, thereby causing water run off and soil erosion.

Management Concern 7 . Vegetat ion: We "rqe you not to "se chemicals If It Is necessary to remove vegetation. It would not only be harmful to the soil, but could contaminate the water, be harmful to wildl ife and people camping or using such areas.

(3)

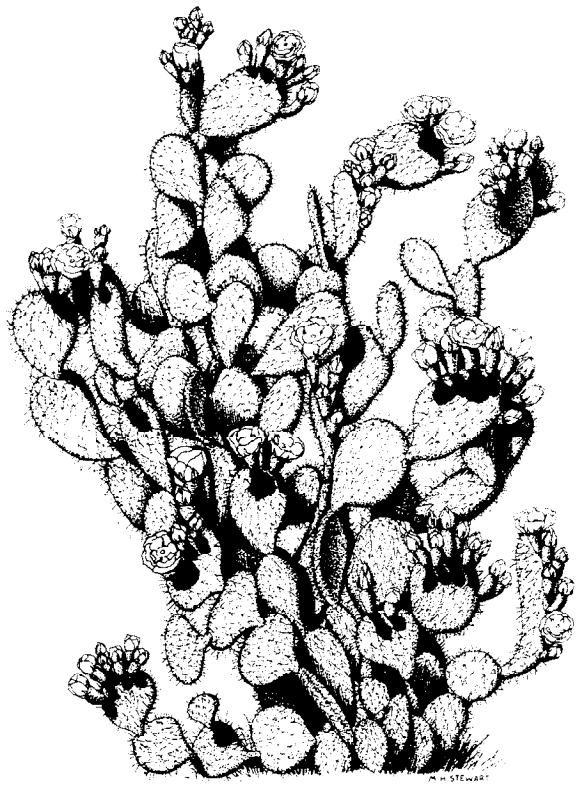
Management Concern 8, Water: We approve of the Timber Draw Dam, but hope you are also looking into ways in which to stabilize the watershed. We suggest looking into methods of Permaculture, a holistic and ecological approach to land management. Also, for the area of the San Pedro River where you are considering removal of the berms. We suggest this not be done until the land around that area sustains thicker vegetation. Removal of the berms now would result in furthering soil erosion.

In conclusion, we would like to emphasize the need to restore Riparian Areas at all cost. Riparian Areas are the life's blood of the western public lands. Without their restoration, severe desertification will result.

Sincerely,

Judith L. Marcsca

Judith L. Marcsca
Bisbee Women's Action Group
Box 953
Bisbee, AZ 85603



136

PO BOX S
BISBEE, AZ 85603
MAY 27, 1990

STEVE KNOX, RIP TEA" LEADER, BLM
RE: SAFFORD DISTRICT PLAN

Thank you for the great management your agency is already doing. In particular, Aravaipa Canyon and the San Pedro Riparian areas are gems, and BLM deserves national recognition for management practices in these areas.

Thank you for removing cattle from the San Pedro River Riparian Area. I ask you to insure their permanent removal.

I am aware that a compromise was worked out on the hunting issue. I support keeping hunters out of the entire San Pedro Conservation area.

I also feel strongly that no other buildings be placed on the San Pedro River. Let any interprative displays be placed in present buildings or in shopping malls in Sierra Vista and Tucson. Administrative buildings should be in present buildiings of in Sierra vista. No new construction please. Future generation will thank you for encouraging the 'natural-"ess ' of the River.

I feel very strongly about preserving what is left of riparian areas in the arid South West. I also feel it is time to revegetate and bring back those riparian areas that have see" serious abuse in the past 100 years.

I also support removing all livestock from all riparian areas in the Safford district. I" particular, I support removing cattle from the following riparian areas: the five drainages that comprise Muleshoe; Turkey Creek, Bonita Creek, Guadalupe Canyon, the Gila and San Francisco Rivers, Eagle Creek, Gila Box, Apache Box and all riparian areas in the District.

I believe that BLM needs to reassess the impact that 'multiple use' has made on our public lands. Much land has been abused by over-use, and is in critical condition compared to pre-white man days. The practice of comparing the current conditions to the severly abused conditions of the 1920s and 1930s must be stopped as it is a distortion.

Not all District land is fit at this time to be used for 'multiple use'. Certain sensitive District lands need protection from continued human centered over-abuse. I recommend that the above mentioned riparian areas be limited to 'non-consumptive use ' for at least thirty years.

In particular please keep cows off the District land adjacent to Muleshoe Nature Conservancy Preserve.

I support "on-game and non-consumptive values, using a resource without abusing or removing it. I support very long range planning, projecting protection of our public land into the next 500 years.

One 'use' that is just as important as 'consumptive use' is 'environmental use' whereby systems have a chance to regenerate without the interference of the consumptive uses of man. These areas can also become areas of 'educational use'.

I support alternative B of the RMP.

Access: Make people walk. Keeps roads away from riparian areas, parallel to stream beds, not in it. Prevent vehicles from driving in stream beds. Avoid switchbacks. As roads encourage erosion. avoid roads whenever possible. Remove the Virgas Canyon Road, Guadalupe Canyon Road and the left fork of Markham Creek Road,

ACECs: All ACECs must have Class designation. Please consider designating all new land aquisitions for ACEC designation.

OHVs: Please close all riparian areas to OHVs during critcal or sensitive times, such as during nesting season.

Riparian Areas: Please prohibit any activity of ADC on District land, in particular around all ACECs, NCAs and Riparian Areas. Riparian area management must have as the primary goal protection and regeneration of habitat of T&E species.

Lands and Realty: District land "ear the Sisbee area being targeted for disposal must not be sold or traded to anyone intending to use the land for consumptive use due to the sensitive nature of that land and the threat of increased erosion to our watershed.

The Swisshelms, Portal area and any other "sky islands' serving as wildlife corriders must not be traded off for any less valuable lands for wildlife. Any land exchanges must he carefully assessed as to their impacts on wildlife, especially migration routes and habitat.

Vegetation: No chemicals used to suppress vegetation, ever, for any reason.

Last, I would like to encourage the BLM to stop any practices that are 'cow-centric' and to keep the bigger ecological picture in mind. Your job is to protect the resources of all species' children, not just human children.

Please remove livestock from riparian areas.

Sincerely,
Douglas Pressel
Douglas Pressel

137

BLM
425 E. 4th St
Safford, Az.

Dear BLM,

I had the opportunity of hearing your presentation regarding the Safford District Resource Management Plan when Staff came to Bisbee.

It is my general perspective that the time has come for the American people - and their adjuncts, such as cattle - to walk much more lightly on the earth. The prevailing land ethic of this culture - of taming nature for humankind's purposes - has outlived whatever usefulness it had when this was a frontier. The time has come to let nature be as much as possible - especially in ecosystems as fragile as the Sonoran Desert.

Your decision to prohibit cattle grazing in the San Pedro Riparian Area is a step in the right direction. This policy should be extended to all other riparian areas in your jurisdiction. Whereas

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politically sacr
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the automobile.
feel the need to t
off established ro
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realize that it wo
to impossible to
people to get out
+ enjoy nature
Certainly, however
should be confin
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of OHVs in a una
subject to staff p

By the same token
in riparian area
out in such a m
discourage vehic
stream banks +

OHVs should be denied access to riparian + other sensitive areas during critical seasons such as wildlife nesting times. As much as possible, all human activities should be restricted in wildlife protection areas — this includes grazing, trapping by ADC, OHV use, locating administrative building, etc.

Finally, poisonous chemicals have no business being used anywhere near wildlife or water. Physical removal of plants is far preferable to the application of herbicide. The money usually spent on the latter would be far better spent on wages for any additional help needed to remove plants.

Thanks for listening, not just to me but, more importantly, to the earth.

Very truly yours,
Dan Frey
PO Box 1551
Globe, Az 85603

138

PO BOX 612
BISBEE, AZ 85603
MAY 22, 1990

STEVE KNOX, RMP TEAM LEADER, BLW
RB: SAFFORD DISTRICT RESOURCE MANAGEMENT PLAN

Thank you for the great management your agency is already doing. In particular, Aravaipa Canyon and the San Pedro Riparian areas are gems, and BLM deserves national recognition for management prctices in these areas.

Thank you for removing cattle from the San Pedro River Riparian Area. I ask you to insure their permanent removal.

I am aware that a compromise was worked out on the hunting issue. I support keeping hunters out of the entire San Pedro Conservation area.

I also feel strongly that no other buildings be placed on the San Pedro River. Let any interpratives displays be placed in present buildings or in shopping malls in Sierra Vista and Tucson. Administrative buildings should be in present buildiings or in Sierra Vista. No new construction please. Future generation will thank you for encouraging the 'natural-ness ' of the River.

I feel very strongly about preserving what is left of riparian areas in the arid South West. I also feel it is time to revegetate and bring back those riparian areas that have seen serious abuse in the past 100 years.

I also support removing all livestock from all riparian areas in the Safford district. In particular, I support removing cattle from the following riparian areas: the five drainages that comprise Muleshoe; Turkey Creek, Bonita Creek, Guadalupe Canyon, the Gila and San Francisco Rivers, Eagle Creek, Gila Box, Apache Box and all riparian areas in the District.

I believe that BLM needs to reassess the impact that 'multiple use' has made on our public lands. Much land has been abused by over-use, and is in critical condition compared to pre-white man days. The practice of comparing the current conditions to the severly abused conditions of the 1920s and 1930s must be stopped as it is a distortion.

Not all District land is fit at this time to be used for 'multiple use'. Certain sensitive District lands need protection from continued human centered aver-abuse. I recommend that the above mentioned riparian areas be limited to 'non-consumptive use" for at least thirty years.

In particular please keep cows off the District land adjacent to Muleshoe Nature Conservancy Preserve.

I support non-game and non-consumptive values, using a resource without abusing or removing it. I support very long range planning, projecting protection of our public land into the next 500 years.

One 'use' that is just as important as 'consumptive use' is 'environmental use' whereby systems have a chance to regenerate without the interference of the consumptive uses of man. These areas can also become areas of 'educational use'.

I support alternative B of the RIP.

Access: Make people walk. Keeps roads away from riparian areas, parallel to stream beds, not in it. Prevent vehicles from driving in stream beds. Avoid switchbacks. As roads encourage erosion, avoid roads whenever possible. Remove the Virgas Canyon Road, Guadalupe Canyon Road and the left fork of Markham Creek Road.

ACECs: All ACECS must have Class I VRM designation. Please consider designating all new land aquisitions for ACEC designation.

OHVs: Please close all riparian areas to OHVs during critcal or sensitive times, such as during nesting season.

Riparian Areas: Please prohibit any activity of ADC on District land, in particular around all ACECs, NCAs and Riparian Areas. Riparian area management must have as the primary goal protection and regeneration of habitat of T&E species.

Lands and Realty: District land near the Bisbee area being targeted for disposal must not be sold or traded to anyone intending to use the land for consumptive use due to the sensitive nature of that land and the threat of increased erosion to our watershed.
The Swisshelms, Portal area and any other 'sky islands' serving as wildlife corriders must not be traded off for any less valuable lands for wildlife. Any land exchanges must be carefully assessed as to their impacts on wildlife, especially migration routes and habitat.

Vegetation: No chemicals used to suppress vegetation, ever, for any reason.

Last, I would like to encourage the BLM to stop any practices that are 'cow-centric' and to keep the bigger ecological picture in mind. Your job is to protect the resources of all species' children, not just human children.

Please remove livestock from riparian areas.

Sincerely,
Cathe' Fish
Cathe' Fish

139

6605 N Foothills Dr.
Tucson, AZ 85718
May 30, 1990

Steve Knox
Safford District
Bureau of Land Management
425 E. 4th St., Safford AZ 85546

Dear Mr. Knox

I am writing to express my concern over the management of BLM land in the Safford District. I support the designation of Areas of Critical Environmental Concern as suggested by the Sierra Club. Within these areas cattle grazing should be eliminated, surface mining should be prohibited, ORV off-road use should be banned, and in general the riparian areas should be preserved in a natural state.

As you well know, riparian areas have all but been lost in the State of Arizona, and what few areas remain are critical to the native ecosystem. They provide a critical resource for the surrounding wildlife, as well as for endangered native fish. The activities that threaten this valuable resource, as described above, should be curtailed. Thank you for your attention to this matter

Sincerely,
Jeff Burgess
Jeff Burgess MD

140

5/29/90

Mr Knox

We are writing to comment on your EIS draft for your Resource Management Plan for your district.

Having hiked extensively throughout this area we feel you cannot overlook the impact of cattle grazing.

Grazing is one of the most devastating ~~to~~ threats to the many endangered ecosystems but it is just one of many threats including surface mining and off road vehicles.

We hope you will seriously consider banning these activities from the most sensitive areas of your district as you prepare your final EIS.

Thank You
Mr & Mrs Joseph Ciaramitaro

Mr & Mrs Joseph Ciaramitaro
6115 N Canyon Dr
Tucson 85704

141

5/29/90

Dear Ray Brady,

I am writing to urge you to support the BLM in destocking the wolf habitat in the Safford District so that wolf-cow conflicts can be avoided. I have written to Senator DeConcini and James Abbott, Forest Supervisor - Coronado National Forest - concerning the same issue. The Wolf is a vital part of our eco system - and a beautiful creature that we have taken for granted and I feel we have a responsibility to help preserve and encourage the growth of these intelligent wonderful creatures. I watch as the deserts and forests

141-1

slowly begin to disappear - and I think of our future generations. So please support this issue. Our children need the wilderness

Thank you

Sincerely

Neil Heiser

142

5/29/90
Martin Pokorny
390 E. Calle Arizona
Tucson, AZ 85705

Mr. Ray Brady
Director, Safford District
Bureau Of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Brady,

I am writing you this letter to express my concern for the preparations being made in the Safford District for the reintroduction of the Mexican Grey Wolf, and to inquire into some aspects of this process. I wholeheartedly support the reintroduction of the wolf onto our public lands in general, and the Safford District in particular. The wolf is an integral part of the ecosystem in southeastern Arizona which has been unfortunately missing from our lands for too long. I believe that except for a few interests (e.g. ranchers), the general public would accept bringing the wolf back onto the public lands if the facts were made well known. Any opinions which assert seeming drawbacks to such a plan can be shown to be shortsighted and misplaced if people learn and understand the true worth of predators to the health of the BLM lands' ecosystems. Any economic costs can likewise be absorbed if people are willing to accept a healthy and not necessarily anthropocentric management of the public lands. I myself am willing to incur some costs to have wolves on the public lands which, although I spend much time on these lands for recreational purposes, I am probably never going to see.

142-1 So I ask you, what preparations is the Safford District making for the reintroduction of the wolves? I hope that you would consider managing the lands in a manner consistent with the reintroduction and recovery of the Mexican Grey Wolf as soon as possible. Perhaps begin by removing cattle from suitable wolf habitat; an action which would minimize problems encountered between the wolf and ranchers when the time comes. Although wolf-cattle encounters would occur, I am sure that they can be minimized with good planning. Please consider making efforts for the purpose of bringing wolves back to the Safford District an integral part of the Safford District Resource Management Plan.

I appreciate your efforts in this process, and would like you to keep me informed of progress in this area. Please consider my opinions, and I hope that they do a bit in spurring you to greater action in this effort. If you could inform me of specifics regarding your plans in this effort, and regarding past actions or opinions, I would be grateful.

Sincerely,

Martin Pokorny

143

8825 W Monte Cristo
Glendale AZ 85306
May 30, 1990

Dear Mr Brady,

143-1 Regarding the Safford RMP, I hope you will cooperate with the Fish & Game Dept. to reintroduce the Mexican Wolf to Arizona. Areas suitable as wolf habitat should be managed as such and destocked of cattle.

Sincerely,
Bettina Beckel

144

5/31/90

Dear Mr. Knox,

I am writing in concern about the management of the Safford District. First I believe the impacts of grazing (presently overlooked) should be given a great deal of attention. Furthermore, the failure to consider grazing as a significant issue in the EIS is a violation of the NEPA. 144-1

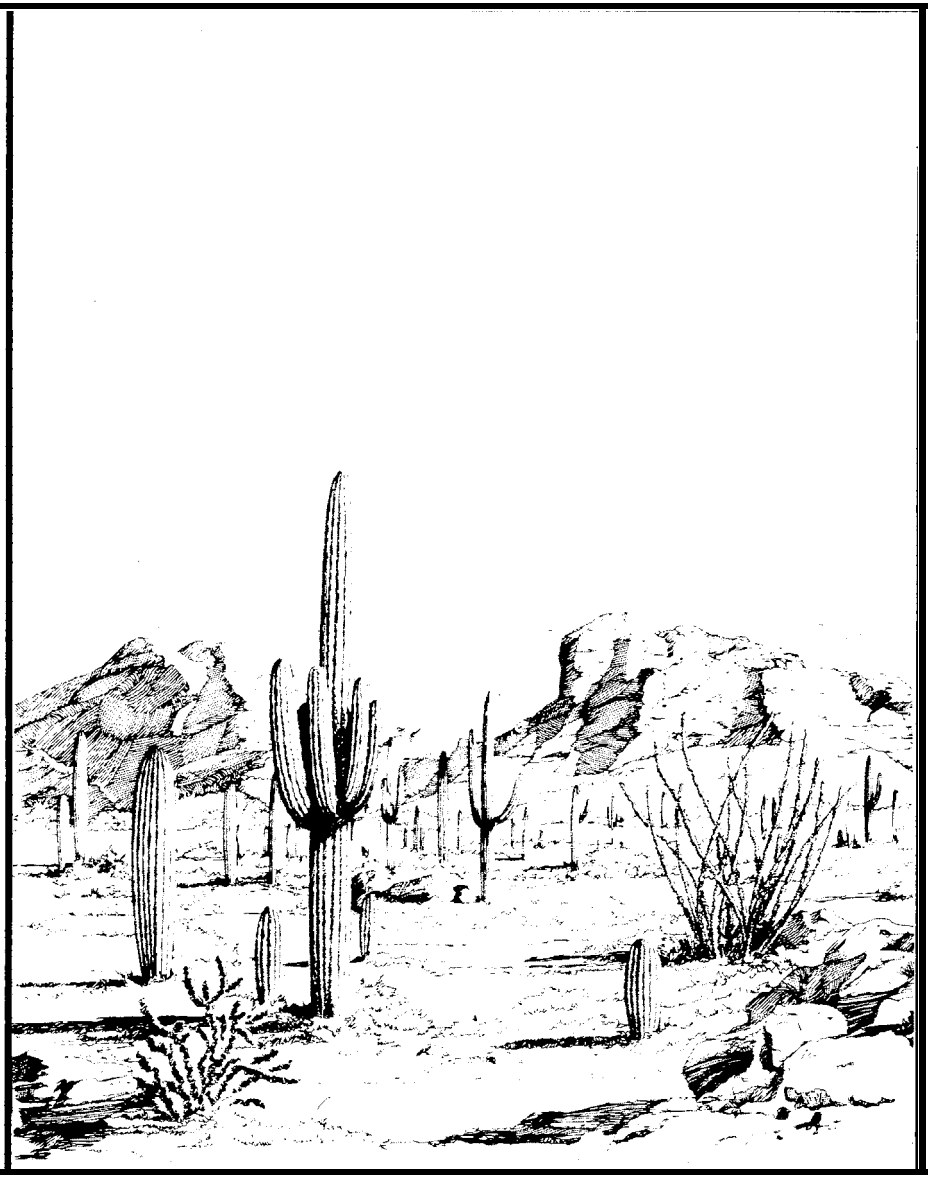
I would urge your organization to preserve all habitats where there are threatend or endangered species. Those habitats that have been effected should be restored as well. Also, the riparian areas are globally endangered ecosystems, and should be recognized as such within the Safford district. 144-2

Finally, I believe in the prohibition of surface occupancy mining as well as the use of off-road vehicles off pre-established roads and in all Areas of Critical Environmental Concern that Edward McCain and Ken Rait have recognized. I would like to see Resource Management Plan reflect these important suggestions. Thank you for your attention.

Again, thanks,

Amy E. Schell

Amy E. Schell



145

May 31,1990

Dear Mr.Knox,

Thank you for sending me the Safford District Resource Managment Plan. After having read the plan, I'd like to put my two cents in...

Even BLM prefers Plan A, I still prefer Plan these few changes:

Issue 4: A, I strongest about this issue, I"d like to comment on it first. I'd like to begin by congradulating you on your excellent decision to keep livestock out of th. San Pedro Riparian Area. I strongly encourage the BLM o enact the same □□•⊠ • s with tha San Pedro Riparirn District for the Muleshoe,

145-1 Aravaipa, Bonita Creek, San Francisco River Area, Gila Box, Gila River Area, Apache Box, Turkey Creek, Guadalupe Canyon, and other significant Riparian Areas in the Safford District.

145-2 Please consider establishing a buffer zone around all ACEC's, NCA's and Riparian Areas where ADC would be prohibited.

Issue 1: Any road access in the Riparian Areas should run parallel to stream flow and not in it. All crossings through Riparian Areas should be at right angles to stream flow helping

145-3 to discourage people from driving up and down the stream bed. Close off or avoid developing any switchback road acess in all Riprrian Areas. Please move Virgus Canyon Rd, left fork of Markham Creek Rd and Guadalupe Canyon roads out of Riprrian Areas.

145-4 Issue 2: All ACEC's should have cl... I VRM designation. All new land acquisition5 should be considered for ACEC designation.

Issue 3: All sensitive and Riparian Areas shouldhave seasonal closure to OHV's during nesting times for wildlife.

Management Concern 2.Lands and Realty: Do not trade off the Swisshelm Mt area, Portal area adn other sky islands serving as

145-5 wildlife corridors for any less valuable land for wildlife. Please carefully assess any land exchanges for the impacts they would have on wildlife, especially migration router.

145-6 Management Concern 6. Soil Erosion: I encourage the building of the Timber Draw Dam on the San Simon River as it would greatly reduce the soil erosion and improve Riparian habitat. REMOVE THE LIVESTOCK FROM THIS AREA so th. land has . chance to recover . . the silt accumulates. As the US Government's General Accounting Office states in their Report in Public Rangelands of June 1988- the key factor in restoring Riparian Areas has been through the removal of livestock.

Mangement Concern 7. Vegetation: I support the use of chemicals to, vegetation control I F ONLY they don't harm the soil, contaminate the water/ground or humans, in other words organically decompose shortly after contact.

Manage..nt concern 8, Water: In addition to building Timber Draw Dam, I strongly suggest look into methods of highly sucessful Permaculture land management. Pleas. do not remove the berms in the area of the San Pedro River until the area sustains thicker growth. Removing the berms could result in furthering soil erosion at this time.

Thank You,

Kathy Daily
PO B 622
Bisbee, Az
85603

146

FRIENDS OF ARIZONA RIVERS

May 30, 1990

Steve Knox, RMP Team Leader
Bureau of Land Management Plan
425 East 4th Street
Safford, Arizona 85546

RE: Draft Safford District RMP/EIS

Dear Steve,

My thanks to you, Meg, and all the others who made my visit to you with Tom Cassidy of American Rivers so informative and enjoyable. Even though we spent much time discussing the concerns that FAR has on some issues in the RMP, I wanted to emphasize some of the points to your team in writing.

Appendix 5 of the plan details very well the many outstandingly remarkable features of the Gila and San Francisco Rivers in the Gila Box, and identifies the best classification of the segments on pages 232-233. The plan finds that designation would not have a negative impact on existing income/employment in the area, but does not consider the possibility of increased tourism and recreation that a national Wild & Scenic River may encourage. Potential impacts on resources by designation are looked at, and, again, any negative impacts from designation are not found to be significant. However, the effects of non-designation, while not looked at in detail in the plan, seem to be significant. The loss of an outstandingly unique riparian area in the desert southwest is not something to be dismissed without further consideration. Your own findings in the plan would lead one to believe the entire Gila Box should be found suitable and recommended to Congress as such.

The first three alternatives given in Appendix 5 do not seem to reflect the prior findings of the plan. The plan should recommend the suitability of the Box on these findings. It is the job of Congress to decide the final determination of whether a river should be designated a Wild & Scenic River. Congress has not yet been presented with this option on the Gila Box. The legislation before them now on the Box deals with Wilderness issues on BLM lands, and no proposal was made regarding Wild & Scenic designation. I do not feel that the Safford District BLM should recommend non-suitability based on your concerns of possible dual designation, but find the area suitable, as it obviously is, and let Congress decide if further protection is warranted.

146-1 FAR feels that the plan should also consider the suitability of Bonita Creek, the San Pedro River, Turkey Creek, and Aravaipa Creek which would all meet the eligibility determination. While we understand your questions regarding the benefit of dual designation in some areas, we feel that the added protection a W&S designation would give may be needed and should be considered in these cases.

Please feel free to contact me for clarificartion or additional comments regarding the suitability of any of these streams.

Sincerely,

Gail A. Peters

1915 West Hazelwood Pkwy Phoenix, Arizona 85015 (602) 242-8478

147

Dos Cabezas Route, Box 6309
Willcox, Az. 85643

June 1, 1990

Mr. Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, Az. 85546

Re: Draft Safford District Resource Management Plan & Environmental Impact Statement

Dear Steve:

The BLM has an opportunity within this District to provide protection to areas which are unique with natural and cultural features. The identification of these areas by the BLM are designated as ACEC, NCR, NRHP, ONA, RNA and USA Units. I have visited many of these areas and have indeed found them to be exceptional; each for respective reasons. I hesitate to single out and name individual areas and therefore recommend all of these areas as a group to be protected with an extended buffer as indicated in Alternate B.

147-1 Several show signs of severe grazing, especially in the riparian areas. It is absolutely essential that these units are provided protection. Limited access to many areas should also be maintained.

I would also like to see an extended regional approach to include more drainage for units such as Aravaipa Canyon Wilderness, Bonita Creek and Gila Box, Muleshoe Ranch Coordinated Resource Area, Peloncillo Mtns. and Guadalupe Canyon.

147-2 Some additional concerns also include more protection around nesting birds such as Black and Lone-tailed Hawks. Campers should not be allowed to camp within the close proximity of nests during the breeding season'. Also, the discharge of weapons

147-3 in these areas should be eliminated.

147-4 I might also suggest the the eradication of exotic tamarisk in several areas such as Aravaipa Canyon, Hell Hole, etc. should be done before a foothold is secured.

I also encourage the additions of all the proposed wilderness areas including the Peloncillo Mtns.

Sincerely,

Dan Fischer

148

Dear Mr. Knox:

I'd just like to add a couple of comments to my previous remarks on the Safford EIS.

148-1 I would like to urge the BLM to recognize grazing as a devasting impact on the land, and the failure to consider grazing as a significant factor in the EIS as a violation of the N.E.P.A.

148-2 Please preserve all habitats where there are threatened or endangered species. Please also restore habitats for threatened and endangered species.

I hope you would also recognize the riparian areas as the globally endangered ecosystems that they are. The preservation, restoration and recognition can only be accomplished through the elimination of cattle grazing in the Safford District's sensitive areas.

Finally I would like to urge you to prohibit surface occupancy mining, and ban the use of ORVs off pre-established roads and in all ACEC's.

I hope we can save what's left of these unique areas to be enjoyed by our children as well theirs. Thank you.

Sincerely,
John Pampeian

149

1208 N. Swan Rd.
Tucson, AZ. 85712
June 2, 1990

Of M P

Bureau
425 E. 4th Street
Safford, AZ 85546

Dear

We are amateur ornithologists and photographers who travel into remote areas with our 4-wheel drive vehicle.

We recently camped at Tule Spring near Landsman Camp in the Aravaipa area and were delighted with the abundant birdlife there.

We were disappointed however to find that this beautiful primitive area is used to graze cattle. The signs of their presence detracted from the natural beauty of the area.

149-1 We are writing to ask that your Resource Management Plan eliminate cattle grazing in Tule Spring and other riparian areas which should really be inhabited only by indigenous animals and birds.

Thanks for your consideration of our ideas.

Yours truly,
Mary Jean Hage
Clive A. Green

150

503 E. Medlock Drive
Phoenix, Arizona 85012

June 3, 1990

Steven Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, Arizona 85546

Dear Mr. Knox:

I offer the following comments on the Safford District Resource Management Plan.

RIPARIAN AREA MANAGEMENT

150-1 I was pleased by the attention that the riparian issue received in the RMP. A long term plan for control of grazing in riparian areas is needed. Also, the District should develop long term plans for reintroduction of riparian species (flora and fauna) to achieve a diversity and restoration of what used to be. The tamarisk problem is very serious in certain areas. I hope that the District will be an active participant in whatever national effort there is to control and eliminate tamarisk. The 12-point management objectives described in the draft RMP are an excellent start for riparian management. Riparian designations should be maximized in the final RMP.

WILD AND SCENIC RIVER

BELOW COOLIDGE DAM

The Gila River below Coolidge Dam certainly is an outstandingly remarkable segment. The features include a dense riparian zone with mesquite bosques, stands of cottonwood and willow that choke the river, and a dazzling array of desert-dwelling birds. Other wildlife are found in the corridor as well. Tamarisk is relatively scarce in most segments. Recreational use of the water (rafting, kayaking and tubing) is limited because of the density of the vegetation, and the swift and numbingly cold water, even in the summer. I recommend that boating be allowed below Christmas, but discouraged because of the natural hazards. Navigation requires excellent equipment, good water reading skills, and a lot of luck to avoid the disasters associated with the numerous "strainers."

I have not visited Segments #2 or #3, which are quite remote and, I hear, unnavigable because of the density of vegetation.

Segment #4 is worthy of a Scenic classification. The shoreline is largely undeveloped; the road and trail system is not developed. and is very limited. Furthermore, no road crosses the rive; in this segment.

The vegetation should not be altered (e.g., cut back) to accommodate recreational users, as this would destroy some of the very reasons the river is unique. (I advocate this even though I am an avid kayaker.)

I have a more fundamental concern about considering this "Below Dam" portion for W&SR designation. The W&SR Act requires free-flowing as a prerequisite. The flow here is "quasi-free-flow" from the ephemeral contributions of the numerous side canyons, the intermittent flows of the San Pedro River,, and the releases from the Dam. The only truly free-flowing portion remaining on any of the Gila River is above the Dam through the Gila Box (see below). Fortunately, the releases from the Dam-have generally enhanced the riparian values of the "Below Dam" segments, at least as far as Winkelman.

I recommend Segments #2 and #5 for Recreational classification, Segment #3 for Wild classification, and Segment #4 for Scenic classification. I am not sure about any classification for Segment #1, given its proximity to the Dam.

THE GILA BOX

Having rafted and hiked the Gila Box and environs many times, I can verify the accurate and fairness of the descriptions of the river values (pages 232-233). As the draft RMP indicates, there are a number of outstandingly remarkable values along the Gila Box

The classification determinations (pages 233-234) are accurate and fair. River study Segment X4 also contains a small, fascinating set of reddish, ancient pictographs, the only set I have seen in the Gila Box, or in all of western Arizona.

The economic considerations (page 234) should mention that national Wild and Scenic River designation may increase tourism. Segment #5 (San Francisco River) is located relatively close to town and will be easily accessible by vehicle. This will be beneficial to the Clifton economy to a small degree and it will allow larger numbers of people to appreciate this component of the national Wild and Scenic River system.

The description of resources appears accurate, that is, most of the

current uses would continue unaffected. However, I would not consider uncontrolled, motorized, vehicular traffic within the riparian zone an appropriate use of a W&SR.

The effect of non designation (page 235) accurately describes the degradation to riparian values that will occur without Wild and Scenic River designation.

The five segments and their classifications, as described on pages 235-236, are well thought out and appropriate. That is:

Segment #	W&SR classification
segment 1 --	scenic
segment 2 --	Wild
segment 3 --	scenic
segment 4 --	Wild
segment 5 --	Recreational.

The classification of Segment 5 as Recreational is weak, but acceptable, as long as BLM exercises reasonable control of vehicles to minimize riparian impact. The thrust here should be not to totally exclude vehicles, but rather to maintain and enhance the very qualities that the local population and others come to see, experience, share, and enjoy. I would hope the BLM and Clifton would work together to maintain the natural attraction of Segment 5.

The Gila Box deserves more protection than just an administrative, "ACEC" designation. The Box contains the last, free-flowing, dam-free segments of the Gila/San Francisco Rivers in Arizona. It is clearly worthy and deserving of a Wild and Scenic River suitability recommendation by the BLM. Such rivers are what the Wild and Scenic River Act is all about!

The Safford District RMP should recommend all five segments of the Gila Box for Wild and Scenic River designation. The classification of the five segments, as proposed in the draft RMP, should be recommended to Congress.

OTHER AREAS

150-2 The RMP should study some of the smaller creeks and "ashes for their eligibility and suitability in the Wild and Scenic River system. At a minimum the RMP should acknowledge (on page 231) that other areas may be suitable/eligible but were not considered in the RMP. This will allow the public to propose additions, without BLM saying that other creeks will be considered only during a RMP

evaluation. This is the concept I am proposing: "Public nominations for W&SR will be considered on their own merits by the District if they are proposed in the period between planning cycles."

The reason for this is that the public and legislative effort for W&SR designation of Arizona rivers and creeks will extend past the deadline for this RMP document. Also, changes in the environment (due to many factors, natural and man-made) may favor eligibility of various segments, and we would not want to loose an opportunity for W&SR protection if it presents itself and the BLM deems such an interim management as appropriate.

OTHER COMMENTS

150-3 I tried to find a list of District's lands that are ungrazed. I consider it reasonable to have a certain portion of the District's lands available for the public to see what the land might look like without the impact of cattle. Could such a list be added to the final document? Could such lands be integrated into the riparian areas, so that entire ecosystems of relatively "natural looking" land can be experienced?

I was not familiar with the areas considered for ACEC but not designated (page 202).

I liked the management objectives for priority species and habitats as described in Appendix 6. To accomplish these objectives would demonstrate the District's strong commitment to conservation and stewardship. I recommend Alternative B for this issue because it offers the most benefits on this issue.

The "road" into Gillard Hot Springs in Sections 26 and 27 of the Gila Box W&SR should be removed from the map and instead shown as a foot trail.

150-4 The index of the RMP should show the page number (v) for "Abbreviations."

Thank you for reviewing these comments concerning the draft RMP.

Sincerely,

Timothy J. Flood

Timothy J. Flood

151

Mr. Steve Knox
BLM Safford
425 E. 4th St.
Safford, Az. 85546

Box 2568
Carefree
Az. 85377

Re. Resource Management Plan (RMP)
Safford District

Dear Mr. Knox:

With regard to the above RMP, I should like to make the following recommendations: 1) that cattle grazing be acknowledged as devastating to healthy habit and be eliminated from all the district's sensitive areas 2) that maximum protection be given to areas where threatened or endangered species exist 3) that riparian habitats be strongly safeguarded from deleterious impact (eg. cattle, ORVs..) 4) that ORVs/ATCs/ATVs be restricted to pre-established roads and tracks. 5) that surface occupancy mining be prohibited.

Yours, Geoffrey Platts

152

THE SAN CARLOS APACHE TRIBE

P.O. Box O
San Carlos, Arizona 85550
(602) 475-2361

BUCK KITCHEYAN
Chairman

RONALD EDWARDS
Vice Chairman

June 1, 1990

Mr. Ray Brady, Disnict Manager
Department of the Interior
Bureau of Land Management
Safford Disnict Office
425 E.
85546

Dear Mr. Brady:

Let me take this opportunity on behalf of the San Carlos Apache Tribe to extend my appreciation to your staff for the presentations they provided on the Safford Disuict Resource Management Plan (draft) at the Tribal Council meeting of May 8.1990, and at the March 22.1990, Natural Resource Committee Meeting. These presentations were of interest to the Trite and assisted us in preparing our response to the RMP. I would also like to commend the planning team for preparing a very presentable and readable document.

I have enclosed for inclusion into the formal comment record a summary of issues in the plan that are of concern to the San Carlos Apache Tribe.

Again, my sincere thanks interest that your office has shown in discussing the planning issues that affect the San Carlos Apache Tribe. If you wish to discuss these issues please feel free to contact me or Vice-Chairman Ronald Edwards (at our office) at 475.2361 or contact our Natural Resource Planning staff at 475.2329.

Sincerely,

Buck Kitcheyan
TRIBAL CHAIRMAN
SAN CARLOS APACHE TRIBE

THE SAN CARLOS APACHE TRIBE
P.O. Box O
San Carlos, Arizona 85550
(602) 475-2361

BUCK KITCHEYAN
Chairman

RONALD EDWARDS
Vice Chairman

ISSUES, CONCERNS. AND PROPOSED ACTIONS IDENTIFIED IN THE SAFFORD DISTRICT RESOURCE MANAGEMENT PLAN THAT AFFECT THE MEMBERS AND RESOURCES OF THE SAN CARLOS APACHE TRIBE

After thorough review of Disnict Resource Management Plan (draft) by the Tribal Staff, several issues concern me as they have a negative impact on the Tribe and its members. Other proposed actions within the plan may offer opportunity to and the Bureau of Land Management for improved resource management through increased coordination and cooperation.

I. ISSUES OF LAND STATUS

152-1 The issue of greatest concern to the San Carlos Apache Tribe is the failure to discuss within the RMP the incorrect land status of the trust lands that ate as public domain lands under the management of the Gila Resource Area. This issue is very clearly a federal trust issue as it concerns lands that are within the corpus of the trust. The San Carlos Apache Tribe must take the position that this concern should be identified as a "Planning Issue" within the RMP because of its controversial nature and significance to Furthermore, I believe a format should be developed within the preferred alternative which would prioritize and specify the steps to be taken to resolve this matter. All lands identified in the Executive Orders of 1871 and 1872 as Tribal lands should be recognized as trust lands and returned to the Tribe for the benefit of its members, unless it can be proven that these lands have been legally withdrawn from the reservation. The burden of determining the correct land status falls upon the federal government and particularly upon the Bureau of Land Management Based upon the precedent established in the 1831 Marshall decision (Cherokee Nation vs. Georgia) and supported in subsequent federal court cases, if a treaty (or executive order) issue is in doubt or is unclear then the decision will be made in favor of the Tribe.

An associated land status issue is the inaccurate Safford Disuict maps contained in the plan. The maps depict lands that are currently managed by the Tribe as being a part of National Forest. These maps are in direct conflict with Department of Interior Secretarial Order which returned the land to the Tribe. This action was later supported by a U.S. Solicitor's memorandum (1981)[1]. As you should be aware. Tribal legal codes and ordinances are currently enforced on these lands. By releasing inaccurate maps to you will add to our enforcement problems and create unnecessary

1. Memorandum from acting U.S. Associate Solicitor to U.S. Solicitor dated May 22, 1981.

152-2 bitter feelings with our neighbors. The San Carlos/Coronado Forest land status issue appears to be close to resolution, your next release of district maps should accurately reflect the reservation land status.

IL CONCERNS OVER ACCESS AND ADJACENT LAND ACTIONS

152-3 Areas of lesser concern within the proposed alternatives, but still important, are those issues which; 1) encompass public access onto the reservation, or 2) involve adjacent land actions. Two proposed rights-of-way, Goodwin Wash and Black Rock Wash Roads, will be inconsistent with established Tribal policy as they cross portions of the reservation which have been closed to non-Tribal members. It should be pointed out that the second and third criteria in the Alternative Selection Criteria, page 16 of the RMP, state that "consistency with federal, state and local plans and compatibility with adjacent land uses" will be used to evaluate alternatives. Additionally, the RMP fails to point out that non-members crossing trail and on Ranch Road are required to obtain a permit under our current policy.

I have several concerns about the adjacency issues which need to be resolved before they could be supported by the Tribe. One problem which must be anticipated is that of trespass by unauthorized persons who stray off the proposed rights-of-way or adjacent nails onto closed lands. and rockhounding activities will also be a problem on Tribal land by people using the roads or trail. Increased prevention and enforcement from these actions will add to the cost of resource management on The National Wild and Scenic River proposals and the proposed Gila Crest Trail would have a similar impact on the Tribe as both actions would be adjacent lands which are closed to non-members.

I believe that these issues could be resolved and cooperation. Additionally. these actions may offer opportunities for the Tribe to develop similar proposals on the reservation complimentary to the adjacent BLM actions. One possible action by the Tribe is the designation of the lower Gila River as a 'Tribal Wii and Scenic River." mirroring a federal designation. Other possibilities are trail systems developed within the reservation adjoining the proposed BLM Gila Crest Trail and/or the Safford-Morenci Trail.

III. CONCERNS ON THE MANAGEMENT OF THE LOWER GILA RIVER AND WILD AND SCENIC RIVER PROPOSAL

152-4 Contrary to a statement in the RMP, the San Carlos Apache Tribe is very interested in the management of the lower Gila River. At this time the Tribe is pursuing a new access route below Coolidge Dam to provide recreational opportunities for its members. We are also interested in evaluating the potential for a developed fee recreation area, entirely within Segment 1, as identified in the RMP. Below this segment, it would be difficult for either the BLM or the Tribe to manage the lower Gila as a "Wild and Scenic River" without the full participation of the other party, as the practical management of a river cannot be divided down the middle of the stream course. A Memorandum of Understanding should be pursued on this issue. The National Wild and Scenic River proposal as identified under Alternative B could be preferred by the Tribe, if, after further evaluation, no detrimental impacts arise. This proposal could precede or could follow Tribal action designating this area as a "Tribal Wild and Scenic River" or similar designation. One issue involved in this evaluation would be that of water rights and the establishment of a minimum instream flow for the lower Gila River (if this were to be a part of the Wild and Scenic River proposal). Although recognizes the benefits of a minimum instream flow level on the Lower Gila, the impact that this would have on a in the San Carlos Reservoir would have to be examined.

IV. CONCERNS FOR ETHNOGRAF'HIC AND ETHNOHISTORY PROGRAM OBJECTIVES

152-5 An important issue that has been raised at Natural Resource Committee meetings is the need for the Safford District office to conduct ethnographical research and to document the ethnohistory pertaining to the cultural uses of the Safford District by members of the San Carlos Apache Trite. Under Management Concern 5 - Cultural Resources, several laws are referred to which provide for the protection of traditional life-way values. A program objective. however, was not listed which would guide the program in meeting these obligations. Program objectives should be developed in this area. The members of the San Carlos Apache Tribe represent a unique public that should be recognized, and their traditional uses provided for, when developing and making management decision on the Safford District. Ethnographical studies will assist your office in making these decisions.

V. ISSUE OF ABORIGINAL HUNTING AND GATHERIN GRIGHTS

152-6 A final issue that must be raised in this letter is that of the aboriginal hunting and gathering rights of the San Carlos Apache Tribe on all public lands within the pre-reservation Apache territory, as these rights were never explicitly taken away under the Treaty of 1852, or under any subsequent federal action. As a lead player in wildlife habitat management on public lands, the BLM should be aware that the San Carlos Apache Tribe has not abrogated these rights.

I feel confident that if we work together can be resolved to the satisfaction of all parties involved and to the fulfillment of the federal trust responsibility.

Sincerely,

Buck Kitcheyan
TRIBAL CHAIRMAN
SAN CARLOS APACHE TRIBE
JUNE 1, 1990

xc: Mr. Wilson Barber, Phoenix Area Director, BIA
Mr. Allen Anspach, Superintendent, San Carlos Agency, BIA
Mr. Lynn Engdahl, Acting Arizona State Director, BLM

153

United States Department of Agriculture
Forest Service
Coronado NF
300 West Congress
Tucson, AZ 85701
602-670-6483

Caring for the Land and Serving People

Reply To: 1950

Date: June 2. 1990

Steve Knox
RMP Team Leader
Bureau of
425 E. 4th Street
Safford, Arizona 85546

RE: Your draft Safford District Resource Management Plan and Environmental Impact Statement.

Dear Mr. Knox:

The Coronado National Forest has reviewed the BLM Safford District Resource Management Plan and Draft Environmental Impact Statement, as requested in a letter from your office, dated January 1990.

We appreciate the opportunity to comment on your Resource Management Plan/EIS. Overall, the Plan/EIS reflects a thoughtful and thorough assessment of the "multiple use" and "sustained yield" philosophies inherent in policies. will help insure the fair management of public land.

We have the following comments regarding this Plan/EIS.

Issue 1 - Access

153-1 In Chapter 2. pages 23-24. the Plan identifies reconstruction Of the Jackson Cabin mad. What standard will the BLM portion of the reconstructed road meet? The Forest segment is on a very steep grade and a safety hazard for vehicle travel. Tbe standard, of the reconstructed BLM could affect what direction the Forest will need to take on the forest segment in order to be compatible with the BLM portion. Another option would be to close the Forest segment and build trailhead facilities on BLM land (this would be our preferred option). With the upgrading of the road, close coordination between the two agencies will be required to protect resource values.

Issue 2 - ACECs and Other Types of Special Management

The designation of ACECs is a step in the right direction in the recognition of important historic: cultural. scenic and natural values.

153-2 The Turkey Creek ACEC is to one of the highest densities of common black-hawks in Arizona. This is another "value" to this ACEC. Perhaps this could be added to Table 2-1. Note that black-hawk is hyphenated and that this correction should be made in Table 3-2 and on pages 30 and 50, and wherever the appears in the document.

153-3 Eagle Creek Bat Cave ACEC is a maternity colony cave for the Mexican free-tailed bat. The existing gate. even if seasonally locked, can easily be climbed. and therefore is not adequate to manage the cave. Perhaps a seasonal pate closure. with a design similar to the one at the Cave of the Bells. Santa Rita Mountains, could be examined.

Issue 3 - Off-hi&way Vehicles

153-4 Eagle Creek is a nesting area for Peregrine falcons. OHV use. and the subsequent noise. in this creek could be a major disturbance to the nesting of Peregrine falcons. suggest BLM examine the option of seasonal closure of Eagle Creek to OHV "se.

Issue 4 - Riparian Areas

153-5 Page 29, #3. "Develop a riparian inventory system." Doesn't the BLM have a nationally developed inventory system called "Coordinated Riparian Area Management - course 1737 - 1E"?

153-6 Page 135 - "Riparian/Aquatic Habitat - In Arizona. 60 percent of wildlife and fish species are dependent upon riparian and aquatic habitats." Aren't 100 percent of the fish species an aquatic habitat? This sentence should be rewritten.

Management Concern 1 - Wildlife Habitat

Alternative B is a more favorable alternative for wildlife. however. Alternative A (the preferred alternative) is an acceptable balanced approach to management of all resources.

153-7 The objectives and actions. of this section. seem like reasonable ways to manage the resource. However. they do not spell Out how these actions will be accomplished. Will more specific direction and further environmental analyses take place before decisions are implemented? Will mitigating measures be developed prior the Preferred Alternative?

153-8 On page 31 numbers 11. and 12. are good actions, but seem to imply that this is the only wildlife input into livestock allotment management plans (AMPs). There Should be an action that calls for wildlife input in AMPs for ALL priority species and their habitat.

153-9 On page 135 priority species with non-specific habitats are described. These species include Peregrine falcon and several bat species. These species do have Specific breeding sites and feeding areas. The document eventually discusses those specific requirements within the non-specific section. The next Section discusses priority species with specific habitats. This section includes mule deer, white-tailed deer. and black bear. These Species may have specific habitats but they aren't any more specific that Peregrine falcon or bat habitats. Perhaps the BLM should just discuss priority Species and their habitats and not try to separate them into these groups.

153-10 Throughout this document individual species are discussed. However. quail and doves are lumped (except for Montezuma this distinction? Why should Scaled Quail and Gambel's Quail be lumped? Stick to individual species and their own habitat requirements.

153-11 In Appendix 6, page 248 - Pronghorn Antelope, "strategic" is misspelled.

153-12 Gould's turkey, is this species a candidate for reintroduction? If so where?

153-13 Would prescribed fire policy on Forest conflict with goals? Close coordination is needed.

Management concern 2 - Lands and Realty

153-14 Throughout the document BLM lands are referred to as public lands. National Forest Service lands are also public lands. Perhaps this distinction should be made clearer, by explaining the legal origin in federal legislation of the term "public lands". public lands Should be identified as such.

153-15 Forest managed public lands and BLM managed public lands often are adjacent to each other with intermingled private and state administer& lands within the BLM portion. Acquiring private and/or state administered lands within the BLM boundary has many benefits. Watersheds and environmental corridors could be managed with the same resource objectives and management goals. If management goals for adjacent public lands are in conflict, then many benefits would be lost. If the BLM acquires land in the Bass Canyon area east of Muleshoe Ranch Sod extends the management goal of preservation to that area, conflicts in management between could develop. The Forest managed public lands in that area are managed for erasing cattle. Water. in that area, is managed for use by cattle and wildlife, which may be in conflict with BLM's instream flow goals off

the Forest. Closer coordination between agencies would be required in order to manage adjacent lands in a harmonious fashion.

Management Concern 3 - Outdoor Recreation and Visual Resource Management.

153-16 Page 34 - This is the first that the Coronado National Forest has heard of the Galiuro/Aravaipa/Santa Teresa Trail. We cannot find Soy additional information on this project within the BLM-Plan/EIS. IS this the Arizona Trail? The concept of having an extended trail is good, however, close coordination will be needed because the majority of this trail System would be on Forest and within wilderness areas. Impacts on wilderness resources, user capacities. utilization of the existing Forest trail System. trail Standards, staffing, and funding. will all need to be addressed before implementation. There would be a heavier impact on the Forest to implement than on the ELM.

Management concern 5 - Cultural Resources

The preferred alternative (A) has the advantage of presenting a balance between area and resource use and protection. Effort is broadly distributed; attention is given to a wider range of priorities or planned actions than in the other alternatives. These qualities make this alternative attractive to a wider range of interest groups.

153-17 However, it Seems that many of the actions and priorities of the various alternatives could be implemented by conducting an intensive archaeological Site inventory as considered in Alternative D. Alternatives A and B advocate a study of vandalism but this miaht best be accomplished as part of an intensive archaeological survey (Stratified or judgemental) where the impacts of damage could be evaluated in the context of the array of sites in the area. the uniqueness of the resource, and the quality or value of that portion of the resource that has not been disturbed. Areas with substantial evidence of vandalism could be surveyed first in order to be able to assess the degree of damage.

153-19 Money to be allocated for promoting and developing predictive models (Alternatives A Sod C) could be Spent on inventories and on reporting the results of broad Scale inventories that could be used more effectively to "predict" Site locations in the future. So little is known about so much of the district that it may be premature to attempt to develop predictive models.

In Alternatives A and C. rock art seems to receive a higher priority status types of cultural resources by virtue of having a research design specifically targeted at rock art studies could be carried out in conjunction with an intensive archaeological survey and therefore would not require a seperate research design. Also, volunteers and researchers conducting rock art Studies and recording in the district could be required to submit a research design. Collectively these research designs could be used to lessen the cost to BLM of preparing or revising a general research design.

153-20 There also seems to be a heavy emphasis on historic cultural resources and information. Obviously, historical resources are important. yet there is also a Substantial pap in data for the prehistoric and protohistoric periods in the Safford District area that can only be filled with intensive inventory. Huge areas are virtually unknown while the resources are Continually being vandalized. I do encourage the BLM to conduct ethnographic studies while still possible. putting considerable effort into interviews and so on before informants die. Perhaps the BLM could enlist the help of local colleges and volunteers in this effort. Students at Cochise College have numerous contacts with local residents and can pain access to people, information, and lard that ELM (federal) employees cannot.

Alternative A promotes but does not fund scientific research as Alternative C does. Given the increasing interest in southeastern Arizona by individuals conducting their own research eradually larger tracts of land would be surveyed and sites recorded if even small amounts of funding were made available. Funding to individuals conducting research would go along my toward filling out the site inventory. For example, small amounts of funding would encourage researchers to record sites other than those of immediate concern to their research and the results of their work.

The difference in emphasis on priorities between Alternatives A and C lead the Forest to support Alternative A simply because of the immediate need to curb adverse impacts to sites. Yet. again I emphasis that knowing where sites are and the relative scientific value of these sites (Alternative D) my ultimately prove more fruitful in the longrun. Cultural resources can only be protected if their locations are known.

General Comment

There are copies of the RMP/EIS tht have blank pages - pages 160, 161. 164, and 165. These blank pages should have addressed the environmental consequences of implementing specific actions proposed in each alternative.

Sincerely.

James R. Abbott
Forest Supervisor

Caring for the Land and Serving People

FS-6200-28(7-82)

154

315 E. ELM
TUCSON, AZ 85705

Dear Mr Knox —

I URGE YOU TO INCLUDE IN THE RMP/EIS THE FOLLOWING FEATURES:

154-1 1) PERMANENT ABANDONMENT OF THE VIRGIN CANYON ROAD. I DO NOT SUPPORT RE-OPENING IT. IF IT IS RE-OPENED, HOW WILL IT AFFECT WILDLIFE + SOLITUDE? HOW WOULD SUCH AN ACTION BE CONSISTENT WITH MANAGEMENT OF THE ARAVAIPA WILDERNESS?

154-2 2) PHASE OUT ALL LIVESTOCK LEASES AS THEY COME UP FOR RENEWAL. THIS WOULD IMPROVE HABITAT + FREE UP STAFF TIME TO WORK ON MORE IMPORTANT ISSUES. HOW CAN YOU PERMIT CONTINUED GRAZING WITHOUT ASSESSING THE EFFECTS?

154-3 3) CLOSURE OF ROADS LEADING TO THE JAVELINA PEAK DUNES. THE BLM APPEARS TO BE MAINTAINING A CAMPGROUND AT THE EDGE OF THE DUNES FOR THE BENEFIT OF ORVS. THE NOISE + EROSION OF HILLSLOPES RUINS THE AREA FOR WILDLIFE + RECREATION. I UNDERSTAND THAT THIS IS A FOSSIL-RICH AREA. WHAT ARE THE IMPACTS OF PROMOTING THIS ORV USE?

154-4 4) RECOVERY OBJECTIVES FOR ALL ENDANGERED, THREATENED + CANDIDATE SPECIES OCCURRING ON BLM LANDS.

154-5 5) RECOVERY OBJECTIVES FOR THE MEXICAN WOLF.

154-6 6) CESSATION OF GRAZING IN ALL ACECS.

Julia Fonseca

155

Stephen
4575 North 17th Avenue
Phoenix. Arizona 85015
June 5. 1990

Mr. Steve Knox
RMP Teem Leader
Safford District Office
Bureau of Land Management
425 Fourth Street
Safford, Arizona 05546

Ret Safford District Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Knox:

The Safford District Is to be commended for Its work on the above referenced document. It Is more easily understood than the Arizona Strip Draft RMP and EIS due to the simpler format.

I would like to offer my comments for each Issue and management concern. Please Include my comments as part of the official public record.

ISSUE 1 - ACCESS

I support the preferred alternative. This is a critical Issue and needs the District's utmost attention.

ISSUE 2 - ACECs

The Gila Box, Swamp Springs-Hot Springs and Peloncillo Mountains ACECs all include bighorn sheep as a value. Although not listed as having a bighorn sheep value the Turkey Creek Riparian ACEC provides the access to bighorn sheep range In the north end of hunt unit 32. The management prescription for all these ACECs Is limiting OHV use. The draft RMP does not define what limited OHV use Is. If it means limiting vehicular traffic to existing roads and trails I can support it. If it means something more restrictive spell it out.

155-1

Two alternatives recommend varying acres to Congress as suitable for inclusion In the National Wilderness Reservation System for Aravaipa Canyon and Galiuro Mountains. Two alternatives make no suitability recommendation. I do not feel any acreage should be recommended to Congress for wilderness additions in either the Aravaipa Canyon or Galiuro Mountain areas.

ISSUE 3 - OFF HIGHWAY VEHICLES

I support the closure of bighorn sheep lambing areas

from February 1 to April 30 and limiting OHV use to existing roads and trails In those areas the remainder of the year.

ISSUE 4 - RIPARIAN AREAS

All but one of the alternatives addresses building Timber Draw Dam on the San Simon River. I strongly support this effort and urge It be done as quickly as possible to keep costs down. I further archaeologicl values should not interfere with this project, but should certainly be considered and mitigated as much as possible.

MANAGEMENT CONCERN 1 - WILDLIFE HABITAT

I support the establishment of both Rocky Mountain and desert bighorn sheep as priority species and their habitats as priority habitats.

I support the transplanting and augmentation of priority wildlife species.

"Optimum wildlife populations" are not defined. If actions are Implemented to manage habitat for optimum wildlife populations how will you know when you have arrived at the optimum population? Who. or what agency. will make the determination?

155-2

I do support actions which will manage wildlife populations within the carrying capacity of the habitat based upon ecological conditions.

MANAGEMENT CONCERN2 - LANDS AND REALTY

I support the preferred alternative.

MANAGEMENT CONCERN 3 - OUTDOOR RECREATION AND VISUAL RESOURCE MANAGEMENT

I support the preferred alternative.

MANAGEMENT CONCERN4 - ENERGY AND MINERALS

I support the leasing of energy and other leasable minerals subject to conditions which do not allow surface occupancy In established bighorn sheep lambing areas from February 1 to April 30 each year.

MANAGEMENT CONCERN 5 - CULTURAL RESOURCES

I support the preferred alternative.

MANAGEMENT CONCERN 6 - SOIL EROSION

I support the preferred alternative. especially the construction of Timber Draw Dam (see comments under Issue 4).

MANAGEMENT CONCERN 7 - VEGETATION

I support the preferred alternative.

MANAGEMENT CONCERN 8 - WATER RESOURCES

I support the preferred alternative.

MANAGEMENT CONCERN 9 - AIR QUALITY

I support the preferred alternative.

MANAGEMENT CONCERN 10 - PALEONTOLOGICAL RESOURCES

I support the preferred alternative.

Thank you for the opportunity to comment on this document and help guide the management of public land in the Safford District.

Sincerely,

Stephen M. Williams

Stephen M. William

156

SIERRACLUB

Grand Canyon Chapter Arizona

RINCON GROUP

Steve Knox, RMP Team Leader
Safford District Office
Bureau of Land Management
425 E. Fourth Street
Safford, Arizona 85546

June 4, 1990

Regarding Safford District RMP/EIS Analysis and Comments

Dear Mr. Knox:

Enclosed are the official Grand Canyon Chapter Sierra Club comments on the RMP/EIS for the BLM Safford District. Please enter these comments into the public record.

Several authors participated analysis: Ken Rait (grazing, riparian areas, wolf re- Hall and David Mount (riparian areas, OHV's, mining, endangered plants and animals). Edward McCain (ACEC's, management priorities), Sheila Dean (riparian areas), (riparian areas), Lanny Nichols (grazing), Sarah Fox (bats), Gail Hartman (archaeological resources).

We sincerely appreciate the opportunity to participate in public lands management and planning. We look forward to your considered responses to our concerns and hope to be able to work with you in the future toward sound management of our public land resources.

Sincerely,

Diane Breier

Diane Breier,
Public Lards Subcommittee Chair, Grand Canyon Chapter, Sierra Club
2221 East Hawthorne Street
Tucson Arizona 85719

Printed on 100% Recycled Paper

Comments on Safford District Resource Management Plan/
Environmental Impact Statement
by the Grand Canyon Chapter of tbe Sierra Club

The Grand Canyon Chapter of the Sierra Club appreciates this opportunity to comment on the Bureau of Land Management's Resource Management Plan for the Safford Area. Below we have indicated those features of the plan which we strongly support. We have also made recommendations which we believe would improve the plan and provide for more balanced and ecologically sustainable management of the 1.4 million acres involved. These comments include our support for the preservations of riparian areas and our recommendation that livestock grazing impacts be given a greater emphasis in the RMP. We appreciate your consideration of these comments and hope that they will be helpful.

As a means of introduction, we represent the for the State of Arizona. we are strictly a volunteer organization, a group of concerned individuals who care deeply about our public lands. Our co- stems from a realization that these lands provide vital resources and for our State and our Nation and from a fear that, without careful management, these lands way cease to yield these benefits. Our ultimate hope is that all public lands can be managed in a sustainable fashion so that future generations will also be able to reap their benefits.

Commendable Features of the Plan

The BLM is to be complemented in in selection of riparian areas for Areas of Critical Environmental Concern (ACEC) and for recognizing that riparian -must be given priority consideration for management. The plan should be commended for the following important features: (1) the management plans for riparian areas take into account the ecological values of these areas, (2) the large number of ACEC's (34 ACEC nominations) indicates the sincere interest of the BLM in protecting ecologically critical areas, (3) management of lands as natural ecosystems is considered as an option (e.g., use of tire to assist (4) protection of certain threatened and endangered plant species is considered (e.g. the Arizona hedgehog cactus, Table 3-3, p. 146.). and (5) sensitivity to archaeological sites is demonstrated in Alternative A..

Recommendations and Concerns

We would like to make the following recommendations:

1. That grazing be included as an issue in this RMP,
2. mat management goals and ecological standards as they apply to these goals be clarified,
3. That the priorities of management goals, including budgetary commitments, be specified,
4. That reintroduction of wolves be included as an issue, and
5. That the BLM take a more active role in educating the public. ranchers and miners uses of BLM lands.

We will also make recommendations on the following issues and management concerns:

1. Access
2. ACEC's and other types of special management
3. Off-highway vehicles
4. Riparian areas

5. Mining activities
6. sites
7. Wildlife protection
8. Pesticides and herbicides

Livestock Grazing Impacts

The purposeful exclusion of Grazing as an issue in creating this comprehensive management plan deals a crippling blow to for success. The number one human-related negative impact on this area is grazing, especially in riparian areas.

Although the detrimental effects of livestock grazing have been well documented, these impacts are not widely recognized by the general public. This lack of awareness may be due to the following facts:

1. Much of the damage occurred before most non-ranchers arrived in the West.
2. There are few ungrazed areas remaining to allow comparisons to the vast areas that have been grazed.
3. Because of the omnipresence of annoying livestock containment devices, such as barbed-wire fences, cattle guards, and gates, users accept these inconveniences as part of the landscape.
4. Unbiased, accurate information regarding grazing has not been widely disseminated to the public.
5. Because people as taking place far "out there," they believe its effects to not impact their lives.

Indeed, most people don't realize that much of the West was formerly rich grasslands (with abundant and diverse wildlife) that have to a biological desert by more than 100 years of livestock grazing.

156-1 We are therefore asking the BLM to include livestock grazing as an Issue and to add a historical discussion of the full range of environmental impacts cawed by livestock grazing in addition to the impacts of the management plans proposed in this RMP. By including information, the public will have a much better foundation upon which to make informed choices. Please include in this discussion the following impacts summarized below.

1. Tbc removal of vegetative cover in turn causes severe erosion, reduces the soil's ability to retain water, reduces forage for native grazers such as deer, elk, antelope. and has eliminated many species of indigenous flora from our public lands.
2. of soils, streambanks and riparian vegetation allows fertile soils and lush riparian land to be washed away during flooding.
3. The destruction of streambeds and increase in water temperature has killed off local fish and other aquatic animals.
4. The water quality in the riparian areas has been degraded by manure, urine and dead livestock.
systematic removal of native herbivores which compete with livestock for forage has impacted the local ecology.
6. The decimation, extirpation a extinction of almost all indigenous species of large mammals, especially predators, including black bear, fox, grey wolf, bobcat. elk, pronghorn and bighorn sheep has had profound implications animal populations.

there are many side effects caused by grazing and livestock management which are a nuisance to recreational visitors. These annoyances include the necessity of constantly opening and closing gates, the presence of odorous cow manure in recreation areas, the enormous number of flies which breed in manure, the mosquitoes with breed in mud holes created by cattle, the lack of clean water to use while camping. and the general degradation of scenic areas.

Grazing and NEPA

Under section 1502.1 of the National Environmental Policy Act (NEPA), it is stated that "(an EIS) shall p-wide full and fair discussion of significant environmental impacts". Under the same section, it is also stated that "agencies shall focus on significant environmental issues" and under section 1502.2(b), "impacts shall be discussed in proportion to their significance". We believe that the impacts of grazing upon the environment are indeed profound and must be fully considered in response to these sections of NEPA. The agency's failure to consider grazing as a significant impact in the Draft RMP/EIS may be in violation of NEPA. Therefore, we recommend that the RMP/EIS fully consider the impacts of grazing upon the District's water, indigenous wildlife (including species reintroduced pursuant to the Endangered Species Act), and indigenous flora.

156-2 In addition, we note that section 1502.9(c)(ii) in the NEPA reads, "(agencies shall prepare supplements to either draft or final EISs are significant new circumstances or information relevant to environmental concerns and bearing on action or its impacts". The designation of new wilderness and ACECs within the Safford district necessitates reconsideration of of grazing upon these areas. The 1978 EIS completed by the District on the impacts of grazing is now antiquated in light of these new designations. We applaud the Bureau for its spirit and intent in designating these ACECs and want to assure that the impacts of significant uses upon these sensitive-arc fully considered so that the resource is best protected. Consequently, we ask that the BLM respond to section 1502.9(c) of the NEPA, which says that "if a draft statement is so inadequate as to preclude meaningful analysis, shall prepare and circulate a revised draft of action".

Recommendations on Grazing

First, we recommend that grazing be reduced in biologically sensitive areas. As in past RMP's from the BLM, grazing remains the highest priority use under of "multiple use". This priority is often at of other uses (e.g., recreation) and of long-term preservation of the ecological health of these areas. Consequently, we feel that livestock grazing must be drastically reduced on public lands and suggest as a first step the removal of livestock from all proposed riparian ACEC's. We further recommend that all allotments be in AMP's which must be strictly enforced (the RMP indicates that only 41% of all allotments are under AMP's [page 139]). Livestock should be excluded from ACEC watersheds as soon as possible. and any policy on grazing should give a to protection of watersheds in critical areas (such as Aravaipa Canyon). Maintenance of perennial stream flow depends upon the condition of the watershed grasslands and can be drastically affected by (vergrazing. Additional these areas should bc retired to provide forage and adequate habitat for the reintroduction of native herbivores and predators. Wild life habitat and low impact recreation are, in our opinion, the preferred and most beneficial use of these lands.

156-3 Second, we recommend that grazing in all designated areas bc closely monitored to A reasonable objective should be to leave 40% of the grasses in a given

area after grazing. Only if this standard is met should the cattle allotment be allowed at the maximum. WC strongly urge that monitoring higb priority and not dependent simply on available funding. There is balance between grazing, hunting, and maintaining a prey base for native predators. Overgrazing has a chain of negative impacts both on future grazing and on native plants and animals.

156-4 Third, we request that the standards by which grazing impacts are judged be specified. The BLM plan mentions three categories for grazing management (page 139): Improve, Maintain, and Custodial. The regions assigned to each category not specifically identified. In addition, the definition of each of these three categories is not given. We recommend that the standards on which these terms are based be defined and that the management plans of specific areas be more clearly presented.

We will make more specific comments on grazing in riparian areas such as Aravaipa and the San Pedro later in this response.

Management Goals and **Ecological** Standards

156-5 A difficulty in interpreting the goals of this RMP is understanding the standards on which achievement of these goals will be based. significant in assessing the for managing grazing and riparian areas. we have mentioned above the need to clarify the terms "Improve, Maintain, custodial" with respect management (page 139). In addition, on page 29. is directed to maintain riparian areas so that they are in good or better ecological condition by 1997. What is meant by "good or better"? What yardstick will be used to judge the relative health of a given area? Does the BLM have an ecological benchmark by which to compare the status of riparian, grassland, montane, upland, desert. or any other ecosystem? How would these standards affect BLM management? the involved? We would very much appreciate a response to this issue, since our interpretation of these standards may differ from those of the BLM and other persons commenting on the RMP.

We strongly recommend that the "yardstick" chosen should include natural and aesthetic values and should reflect conditions which allow long-term. sustainable maintenance of each specific habitat. In order for the term "improve" to , it is to state the BLM's ultimate goal for the area's ecological status in terms of plant and animal species, soil conditions, water purity and air quality.

Prioritization and Budget8 **as an Issue**

The assumption that BLM will have adequate resources to fully carry out alternatives A, B or any other alternative plan, avoids the critical issue of budget constraints. In order to meet the stated criterion (page 15. "Each alternative will be reasonable and attainable"), fiscal considerations must be addressed.

156-6 We request that the BLM prioritize issues and management concerns to be addressed. This prioritization should include disclosure of specific budget figures for the various Alternatives, as well as other BLM management areas, including EIS's for The San Pedro Riparian National Conservation Area (NCA), Upper Gila-San Simon Grazing Environmental Impact Statement (BLM 1978), Eastern Arizona Grazing Environmental Impact Statement (BLM 1986), and San Pedro River Riparian Management Plan and Environmental Impact Statement (BLM 1989).

In cd.3 to get a realistic picture of an analysis of the past these areas compared with present and projected budgets should be done. It is realistic to expect a RMP to clearly define which budget areas will get top consideration if a given alternative is not fully funded. We request such information as part of a full RMP/EIS for the Safford District.

Below, we state our recommendations for defining the resource management priorities:

1. Reservation of riparian ecosystems should highest priority. Due to the rarity and fragility of these life-sustaining areas, they ate the most valuable but are the most under pressure for usage. Preservation should entail phasing out of grazing and protecting entire watersheds, not just streamcourses.

2. Grassland ecosystems should be given next priority. Every effort should be made to move all BLM grasslands in the direction of natural species diversity and long-term ecological health, so that these areas can for the next 100-200 years. This goal should include preservation of the remaining natural grasslands, especially Turtle Mountain, Table Mountain RNA ACEC, Desert Grasslands RNA ACEC-Sombrero Butte. The natural quality of these areas should be protected (e.g.. by fencing to exclude grazing). In addition, disturbed and overgrazed grasslands should be brought back to a sustainable. healthy state. The remaining relatively undisturbed grasslands should provide a benchmark by which to judge the health of areas now under pressure from grazing. Grasslands that provide habitat for species that are threatened by human activities, including grazing, should be protected (e.g., by fencing tie area to exclude grazing).

3. A third be the identification and preservation of other areas which presently have suffered very little human impact Wherever possible. these areas should receive special status (Wilderness, Wild and Scenic Riven. WSA. ACEC) to assist in their preservation.

Reintroduction of Wolves

156-7 There are at least six potential Mexican Grey wolf reintroduction and recovery sites in the Safford District which we believe should receive special management consideration. The areas identified by the Arizona Game and Fish Department July 1986 Potential Wolf Reintroduction Area analysis include the Gila Mountains, Galiuro Mountains / Sulfur Springs Valley, Chiricahua Mountains I Peloncillo Mountains I San Bernadino Valley, Atascosa Mountains, and Huachuca Mountains I San Rafael Valley. Although many of these areas are managed by the Forest Service, the BLM should play a vital role in managing its lands these areas and along potential migration corridors between wolf habitat areas. Wolf reintroduction is a vital facet of restoring southeastern Arizona's ecological balance.

156-7 We would like to see the BLM participate in minimizing livestock conflicts with wolf reintroduction. we believe can only be achieved by removing cattle from areas of potential conflict. we recommend that cattle be removed from areas contiguous to wolf reintroduction sites and from areas that were historic between upland wolf habitats. We strongly urge to manage its pine, juniper, and oak-grassland expanses above 4000 feet in a manner consistent with the needs of successful wolf reintroduction and to cooperate with other federal agencies in carrying out this vital mission.

Public Eductioo

Much of the past problems on BLM lands have resulted from private individuals and ranchers who are unaware of the their mis-behavior lands they use or enjoy. Therefore, we strongly recommend that the BLM give educating the public about the value and importance of maintaining these lands in a natural and sustainable state. Only when the public actively participates in the preservation of these lands will any management plan be successful. We are aware that the BLM has already begun some education projects (e.g. the visitor information center on the San Pedro). These types of centers should be encouraged and their programs expanded. In addition, the BLM should take an active role in educating ranchers on ecologically-sustainable ranching practices. The Empire Ranch in the Phoenix district of the BLM provides one example of an area that has successfully combined long-term protection of grasslands and riparian habitats. This area could be used as a model for management in the Safford district and the management techniques learned could be passed on to local ranchers. Finally, BLM should also help educate safe mining techniques, such as to prevent heavy metal leaching from mine tailings.

Access

We strongly recommend that any new roads should not closely parallel riparian areas. Roads already constructed may require stabilization or closing, if they fit this criterion. Roads and traffic create the potential for erosion which may contaminate streams and accentuate flood damage. In addition, the impact of roads and the resultant human use in other sensitive areas should be carefully considered. For example, access into watershed areas should be controlled and monitored to prevent abuse. Where the BLM is not able to adequately monitor road use, those roads should be closed.

In other back-country areas, WC recommend that few, if any new primitive roads be opened to minimize impact on the natural environment and that only a limited number of existing roads area be made available. are left open shwld not pass through sensitive area and should not be within a steep terrain. In steep areas, there is a serious problem with erosion, when drivers continually try new routes. There is also the problem of personal injury and possible liability to the BLM. Roads with these bc permanently closed and

With regard to specific roads, we oppose onening Virgus Canvon Road and East Turkey Creek Road (page 24) in the Aravaipa area, since there are already adequate roads in and since increased vehicle and human use would not be consistent with a goal of watershed conservation. In particular, East Turkey Creek Road, if opened, would allow driving right up to the Turkey Creek Riparian ACEC It would then be difficult to control inappropriate human "se of this area and the habitats within the ACEC.

In addition, we oppose opening the Wood Ranch Road (see Appendix 1: Locations of Acquisition of Legal Access #29. p. 183.) mad would allow people to drive though the existing immediately underneath a nesting black hawk site and near an extremely important riparian habitat This road would allow access to and potential abuses in this region, such as poaching of the big horn sheep and other animals, would be very difficult to control.

The Muleshoe Pipeline Road (p. 183. #37) should not be open to the public because it cuts across Bass Canyon. an important riparian habitat and because adequate access to the same area is already provided by the Jackson Cabin Road.

ACEC's
and Other Types of Special Management

156-8 With the imminent passage of the Arizona Wilderness Bill, there are three areas (Javelina Peak, Turtle Mountain, and Day Mine) that were considered for wilderness designation by the Bureau which ate not due any special protection under ACEC designation Wilderness Study Areas (WSAs) are designated by federal land management agencies for lands which have outstanding ecological and/or archaeological values and provide for primitive and unconfined types of recreation. We believe that these three areas should be considered for management under ACEC designation to protect those values which allowed them to be considered for wilderness status.

156-9 Wc nominate the 18,853 acre Javelina Peak WSA for ACEC designation to protect its Chihuahuan desertscrub and semi-desert grassland. By not designating an ACEC for this unique are, the BLM would miss these communities. In addition, significant archaeological resources are the known fossil resource sites including fossilized remains of hones, camels, and tapirs. Among the threatened and endangered species present ate the peregrine falcon and the nightblooming cereus. Wc should include a ban on all off-highway vehicle "se in acreage in order to protect the area's unique sand dune formations and badlands. Since fossils have bee" found in the badlands, any OHV use could have an on undiscovered sites.

156-10 Wc also nominate the 17,422 acre Turtle Mountain WSA for ACEC designation due to the failure of include this unique area in the nation's wilderness system. Rocky cliffs and spires near the eastern boundary provide good habitat for raptors, including the endangered 'peregrine falcon and "bald" eagle. Rocky Mountain bighorn sheep are also present in this area. The ACEC designation for this area must protect the Madrean evergreen woodland, interior chaparral, semidesert grassland, and riparian deciduous forest from the deleterious impacts of increased grazing use. No new water livestock be built as these constructions would encourage cattle "se of the upland% thereby resulting in wildlife conflicts. According to the BLM, the cumulative impact of existing livestock facilities comes close to degrading of the area. In addition to reducing cattle numbers in the area, the ACEC designation should prohibit of OHV's to maintain the recreational value and preserve the historic Safford-Morenci Trail. Finally, all mining activities should be banned within the 17,422 acre area.

156-11 we also nominate the 21,641 acre Day for ACEC designation. The biotic communities represented include Great Basin conifer woodland, Madrean evergreen woodland, interior chaparral, semidesert grassland. Sonoran desertscrub, and riparian deciduous forest. Common black hawks and zone-tailed hawks have been nesting in the area. Populations of black bear, white-tailed deer, javelina, mountain lion. montezuma quail, and scaled quail also exist here. Non-designation would severely impact the scenic and natural area and could result in losses of valuable archaeological sites. Such uses as wood-cutting, mining and OHV "se should be banned in the area to preserve its important qualities.

156-12 Two RNA/ACEC's (Dry Spring and Black Rock) (page 27) should retain their RNA status, eve" though they are designated these areas may not receive the special management they need.

156-13 The Desert Grasslands RNA should be broken down as separate entities because each has unique properties and requires a unique management plan.

Wild and Scenic Riv[redacted]ion

156-14 We recommend that the Gila Box and San Francisco River be deemed suitable for Wild and Scenic River designation. We make this rec[redacted]ion because the proposed NCA designation does not provide adequate protection from OHV use or from the possibility of dam construction upstream from this beautiful recreation area.

Off-highway Vehicles

OHV's, by the fact that they were designed to travel outside of existing roadways, are incompatible While we do not totally oppose OHV use on BLM lands as a sport, this activity should be actively restricted to certain areas. These areas should be marked and monitored. Other areas should not allow OHV use and should be posted accordingly.

156-15 As stated, OHV use of the BLM lands should be allowed on a restricted basis only and must be adequately controlled. We strongly recommend that specific-use areas be set aside for this purpose, near population centers, and that these areas be well marked for identification purposes. In particular, the boundaries of such areas and of areas not open to OHV use should be clearly indicated. These areas should be monitored to prevent abuse, and, if monitoring becomes impossible due to budgetary constraints, these areas should be closed. OHV use should not be allowed in back-country areas where monitoring is not feasible.

In designating an area for OHV use, consideration should be given to the following issues. First, OHV use should be prohibited in riparian areas and in the watersheds of these areas to avoid erosion and damage to riparian plant communities. Second, OHV use should be prohibited from steep hillsides where erosion might become a serious problem. Third, OHV's should be banned from areas which are major breeding grounds for birds or animals or well-established plant communities. A potential choice for an OHV area might be an area which has already had its biological value decreased due to mining, development, or previous OHV use.

Riparian Areas

General Comments and Recommendations.

We are gratified that the RMP emphasizes the importance of riparian areas. On page 128 of the RMP, the rare and unique habitats of these areas are noted , and the reduction in both their size and number is mentioned. However, the plan fails to emphasize that the few remaining riparian areas are actually relicts, tiny representations of watercourses and wild life habitats that existed more than a hundred years ago. With extensive overgrazing, ground water pumping, and stream channelization, the remaining riparian areas are now a small fragment of southeastern Arizona's faunal and floral history. The rarity of these habitats becomes even more striking when it is noted that that several different types of riparian areas are represented: montane streams, desert streams, intermittent streams and dry washes. This diversity is important because it renders each site that much more of a relict environment.

Arizona's riparian areas along with the endangered and threatened species that they support are essentially the equivalent of museum pieces representing a considerably more vast acreage that existed before human encroachment. As such, they must be treated with care and respect. We strongly urge that the BLM shift its emphasis from satisfying human

consumptive uses (livestock and mineral production) to one of preserving more lasting values of healthy ecosystems, including vegetation, soil, water and air.

We would like to recommend that BLM use long-term stability of the riparian ecosystem as a basis for management. Included in this goal should be native species diversity (both plant and animal), water quality (sufficient to sustain these species), and watershed preservation. The recent loss of both diversity and total numbers among populations such as desert fish accentuates the need to preserve riparian areas and their associated flora and fauna. The goal of ecological health should take precedence over other priorities, such as grazing, mining, or recreational uses. Protection of waterways will also ensure the chance to reintroduce native populations that have largely been decimated.

156-16 Because past misuse has caused the destruction of most riparian areas, it is of the utmost importance that the few remaining areas be preserved and protected. We strongly urge that the BLM strive to preserve 100% of its riparian areas (rather than the 75% stated on page 29). Even with the 100% goal, fewer acres will actually be preserved due to resource uses beyond the BLM's control, such as ground water pumping on private land and invasion of non-native fish species.

In addition to preservation of the riparian areas themselves, we also strongly urge preservation of the surrounding watershed areas. Watershed preservation is critical for avoiding excess flooding, erosion, and contamination of water quality. For instance, on page 129 it is mentioned that state and federal surface water quality standards are occasionally violated during intense, long-duration storms. If the upper watershed has a healthy ground cover, with few roads, the effect of high intensity storms on the sediment load of riparian areas would be minimized.

Riparian Areas and Cattle Grazing.

We urge the long range management goal of removing all cattle from riparian areas. We applaud the recent efforts of the BLM to reduce grazing in some riparian areas through methods such as rotation, fencing,and providing alternative sources of water. However, we find that the RMP does not clearly state which riparian areas currently receive protection from cattle grazing and which are planned for restoration. We request that these objectives be made available for public comment.

The BLM's stated interest in restoring riparian areas cannot be achieved as long as grazing is allowed to continue in these ecologically sensitive regions. Consequently, we urge that cattle be fenced out of all riparian areas within the District to allow for restoration of wildlife habitat in conformance with the multiple use precepts of the Federal Lands Policy Management Act. (FLPMA).

156-18 Cattle enclosures would produce the following benefits: reduce peak water temperatures, provide more food and cover for fish species, increase water retention and summer flows on intermittent streams, reduce streambank erosion and loss of productive bottomlands, reduce stream sedimentation and improve fish habitat, reduce fecal coliform bacteria and nutrient loading due to fecal matter in the streambed, and provide critical habitat for indigenous wildlife. The assertion that fencing would restrict movement of indigenous wildlife is erroneous, as fences can be designed that allow for passage of all but domestic ungulates. (Camp Creek, Oregon provides good example of accessibility by indigenous species).

The RMP proposes to restore riparian areas by directing funding only to "reasonably recoverable" areas. The Sierra Club believes constraints are not an impediment to simply requiring cattlemen to build enclosures to lessen their impacts upon riparian areas. Therefore, it is our recommendation hat the BLM implement its prerogative to direct funds to those "reasonably restorable" riparian areas as planned and amend the draft RMP/EIS to require enclosures so that all riparian areas within the District are given the opportunity to recover from grazing pressures. This action would best demonstrate the District's commitment to restoration of these regionally significant public resources.

Because we view of riparian areas as urgent, we favor Alternative B over Alternative A, although even Alternative B protection. A clear advantage of Alternative B is its larger designation of ACEC acres that include riparian areas. Specific reasons for our support of Alternative B are indicated below:

We support the larger ACEC designation forth Bonita Creek area in Alternative B.

156-20

In the Gila Box, the additional upstream acres recommended for ACEC status in Alternative B and the restriction of OHV's from the canyon bottom. We also recommend that, if the proposed NCA for the Gila Box is passed, the upper end of the river from protection. That the Gila River above the old Safford Clifton Road should be retained as an ACEC for scenic, and fishery values. This action would protect an additional three to four miles of river. The lower San Francisco river should also be retained as an ACEC, if the NCA passes. This area deserves special protection as it complements the values of the NCA, including archaeological field sites

156-21

In the Turkey Creek area, we support the additional that would be provided in the Aravaipa watershed by Alternative B. Aravaipa Creek is one of the most outstanding remaining examples of desert fish diversity. It is the only area in southern Arizona where seven native fish coexist, some of which are already endangered or threatened The prescription of "no livestock after expiration of current lease" is also essential for preserving the Aravaipa watershed

Similarly, the Muleshoe Ranch contains endangered species; the ACEC of Alternative A

156-22

While we recognize that the Dry Spring area is proposed for RNA designation, we feel that inadequate protection of this area is provided, even by Alternative B. AU the alternatives ignore the stretches of riparian areas noted by numbers 4, 16,17, 18 and 19 on map 34.

Finally, the 1,767 acres granted by Alternative A to Guadalupe Canyon is undersized. We recommend the 6,984 acres of protected area provided for in Alternative B.

Riparian Area Issue Objectives.

The RMP is vague concerning management of riparian areas that are not included in the ACEC's. It provides broad objectives for the issue of riparian areas, but these objectives are precisely the same for the first three alternatives (see Issue 4 - Riparian Areas, page 29). Therefore, it is difficult for the public to provide what are helpful and useful comments. Nevertheless. we would like to make the following responses concerning these objectives.

As stated above, we strongly recommend that the major objective (to maintain or improve 75% of areas) be expanded to include 100% of these areas.

The objective to inventory riparian areas is commendable (#3) We encourage BLM to pay special attention to populations which may have become stressed by overgrazing, the presence of roads and traffic, or mining activity.

The monitoring plan and tiling flow rights of objectives 65 and #6 are also essential. but should not be implemented in lieu of

We wish to express strong opposition to objective #7 (to "continue to develop grazing systems"). Glazing systems in riparian areas should only be modified in the direction of phasing out permits as they expire. The only way to "manage livestock use for the improvement of is to eliminate cattle and sheep at least from the immediate area of a streamcourse and preferable from the surrounding acres of the watershed. During the transition period, streamcourses should be fenced to avoid direct fecal contamination as well as the caving in of banks and bottom disturbance caused by trampling. Overhanging banks provide stability to stream courses as well as cover for several desert fish, including the endangered Gila topminnow. Fish that are bottom feeders require a stable stream bottom. As the number of cows are reduced, those remaining could be watered at stock tanks.

We support the ban cutting (#8).

The removal of non-native vegetation (#9) should only proceed with the utmost caution, if at all, to stability.

Objective #10 states that "representative relict riparian areas" must be maintained and monitored "to provide a baseline for future management decisions." Although these areas are not specified, we suggest that areas are now representative relicts as existing biologic-al and historical literature clearly describes. We encourage the BLM to monitor their condition and provide protection from grazing, OHV use. mining and mad erosion.

San Pedro River Riparian Area.

We strongly support the recent creation of the San Pedro River Riparian NCA. Due to the area's very sensitive nature and history of from over-grazing. we urge that ample opportunity be given for this area to recover its ecological health. Any plan for this area should emphasize: preservation of the ecosystem. research and preservation of archaeological sites, and low-impact visitation. Plans to develop this area as major tourist center should be reconsidered. Any human-oriented be limited to the northernmost areas of the NCA, allowing the southern areas to be available for use as wildlife corridors, especially for species migrating in from Mexico, such as jaguars, ocelots and Mexican wolves.

156-23

On page 18, the RMP notes that the San Pedro Management Plan prohibits grazing for the life of the NCA plan, and yet management of the 6,521-acre area included in this RMP is not given the same protection. We believe that allowing grazing as part of the management of this area counteracts the management of the surrounding riparian habitat and thus undercuts efforts to preserve and protect the San Pedro River Riparian area. The 6,521-acre area involved should be granted the same protection as the rest of the San Pedro River Riparian NCA. It is not possible to protect riparian values in this NCA if

grazing continues, due to the effects of non-point source pollution from this area into the San Pedro River. These effects must be included in an assessment of riparian values.

Turkey Creek and Aravaipa Areas

We strongly urge that management plans for the Turkey Creek and Aravaipa Creek areas emphasize conservation of these riparian habitats as the highest priority. Included in this priority should be adequate protection of the watersheds which support these areas. In particular, we make the following recommendations.

First, (on p. 190, 5. Alternatives Considered) we urge that the maximum areas possible be designated as ACECs.

Second, that grazing, hunting, mining, and recreation in the upper watershed areas be managed as the major objective. Grazing, in particular, should be minimized and preferably phased out.

Third, we are opposed to opening certain roads in these areas (see discussion above under Access). Specifically, we oppose opening Virgus Canyon Road, East Turkey Creek Road, and Wood Ranch Road.

Mining Activities

While the RMP clearly states the BLM's policy "to foster and encourage" mining activities (page 20. 4). it fails to mention the extreme hazards which inadequately controlled mining. Recent studies have shown that mine tailings are a potential source of toxic heavy metals (e.g., lead, zinc, cadmium) which can contaminate waterways and ground water, adversely affecting plant and animal communities as mental human populations. Lead, for example, can cause irreversible humans This new information indicates that management of mining activity can be based solely on consideration of its potential benefits

156-24

The seriousness of water contamination by mining has only been documented for a short time. Consequently, we feel that it is now essential to n-evaluate any policy on mining. As indicated under the section on grazing, the National Environmental Policy Act requires that significant environmental impacts be discussed in any EIS, especially if new available. In light of these new the hazardous side effects of mining. these impacts should be addressed in this RMP/EIS.

156-25

It is also important to note that the mineral potential in the Safford District is low. Copper ore, for example, is of poor quality compared to other parts of the world. Recycling copper is now becoming cheaper than mining. Consequently, we feel that mining activities on BLM lands should have to be extensively justified before permits are issued. It should be clear that the benefits outweigh the risks and that the risk of heavy metal leaching will be minimized by the use containment techniques.

Because of recent disclosures about the dangers of unregulated mining, urge the BLM to take a much more active role in industry. we make the following recommendations:

1. To best prevent leaching of heavy metals into waterways, no mines should be allowed near steamcourses or in areas which serve as watersheds for riparian areas. Even mines in quite remote areas must be re-assessed, since leaching during flooding is still a potential hazard.

156-26

2. No mining should in ACEC's to the biological communities in these areas, be absolute. and it be possible to allow exceptions by administrative discretion.

3. AU active mines on BLM lands should be required to demonstrate that that their tailings are not a source of heavy of either nearby watercourses or groundwater.

4. Applications for new mines or for opening old ones should be required to include plans for preventing heavy metal leaching.

5. The BLM should take an active role in regulating existing mines and in of metals from these mines.

6. The BLM should take an active role in cleaning up sites of closed mines to avoid metal leaching.

7. The BLM should also determine whether heavy metal contamination from mines on private or other public lands might be contaminating BLM lands and, if so, should apply pressure to prevent future abuse.

While to prevent mining lands, we feel that recent evidence as to the threats posed to human health by this activity requires a reassessment of the BLM's policy to "encourage" mining. Instead, the BLM should save a more regulatory role and should guarantee that mining is

Cultural Resources/Archaeological Sites

we believe that cultural resource management should also be an important goal of the BLM. Cultural resources should be managed not only for information potential and conservation but for public values as well. Improved public understanding should lead to more public appreciation of history and prehistory and should help the public realize the severe environmental consequences of human activities. Although alternatives A, B, and C are all quite similar, since Alternative A places more emphasis on public understanding, it is the Preferred Alternative on this issue from our point of view.

We particularly applaud plans to develop an educational program depicting the geological, cultural and wildlife values of Aravaipa Creek (Action 15, page 38) and the proposal for interpretive use of the Turkey Creek cliff dwelling, the CCC Base Camp near the Safford Airport and selected properties along Bonita Creek. (Action 16, page 38). We support plans to conduct archival research in the Dos Cabezas historical mining area (Action 10, page 38) and to identify historic trails (Action 11, page 38). although these plans (Action 10 may be mote time-consuming than is apparent and thus may not be implementable within the scope of this RMP.

We are especially pleased to see, in both Alternatives A and B, the plan to eliminate livestock grazing Tres Alamos site. (Action 4. page 37). As is well known, livestock grazing on archaeological sites seriously disturbs the surface integrity of both artifacts and features and should wherever possible. We recommend that livestock grazing be eliminated from other important sites with heavy concentrations of surface artifacts or features.

156-27

Finally, we have questions about 3 additional action items. First, we are uncertain as to the goal of revising the Safford District Rock Art Cultural Resource Management Plan (Action 6, page 37). To what extent has the original Rock Art Plan been implemented? Rather than revising the Plan, staff time might be more fruitfully spent on continued inventory, research, and preservation of known rock art sites. Second, we question the appropriateness of plans to "develop a regional research design" (Action 12, page 38). Should not the real goal be the development of criteria or guidelines or the measurement of scientific and public values rather than the creation of a research design? Third, we oppose plans to develop a "rigorous predictive model for the occurrence of cultural resources" (Action 14, page 38). Development of a predictive model will not only require considerable staff time but almost certainly will not yield the desired results. It is our understanding that the U.S. Forest Service met with little success when they attempted a similar approach and, in fact, were urged to concentrate more time on inventory. In our opinion, predictive models should not replace on-the-ground inventory programs.

Wildlife Protection

Eagle Creek Bat Cave

We want to urge the BLM to provide much greater protection for the bats who live in the cave at Eagle Creek.
Dr. Cochran, to be 25 million. By the end of the 1960's there were only 30,000. This precipitous decline is due, in exposure to DDT in Mexico during and, to humans who have deliberately killed or disturbed the bats in this cave. The Eagle Creek Cave is unique in this part of Arizona, because it has the right temperature, humidity and other features which make it suitable as a maternity cave. Bats and their offspring, of which there is only one pa female pa year, return to this cave year after year to reproduce. Therefore, this site is critical for maintaining bat populations.

We have three major suggestions for allowing these bats the longer life span they need to reproduce:

156-28

1. Build a much higher barrier of the cave which can effectively keep out people who would disturb a shoot the bats. The gate which now stands is insufficient, whether locked to keep people out. The Opening to the cave is 65 feet high and could easily allow bats to fly in and out over a barrier which is high enough o keep people out.

2. Close the canyon within 1/2 mile of the cave to four wheel drive vehicles and to firearms. People can now drive right to the cave. carrying guns to shoot at the bars.

3. Educate visitors to the area with good signs which explain the importance of protecting the bats and advise them to leave the bats alone.

In[redacted]ndangered and Th[redacted]ecies

156-29

In most cases, the BLM plan adequately considers the need to protect endangered and threatened wildlife species. However, we recommend the following changes to optimize protection. First, an endangered plant species, *Erigeron piscaricus*., is not listed in Table 3-3 (page 146) of the RMP. This plant occurs in only two locations, one of which is Turkey Creek. We encourage the BLM to add this plant to the list and to develop a plan to appropriately protect this species. Second, increased protection of the watershed areas

south and east of Aravaipa Creek is needed to protect two threatened fish species in this creek (the spikedace and the loach minnow).

We recommend two changes in the proposed policies with respect to the Aravaipa/Turkey Creek area. First, herbicides and pesticides should not be used in the watershed area (as suggested on pages 189-190) to avoid polluting streams which feed into Aravaipa Creek. These chemicals might damage both the fish and their habitat. Second, we are opposed to opening Virgus Canyon Road and East Turkey Creek Road (page 24), becau of the adverse impact that these actions would ultimately have on Aravaipa Creek.

Pesticides and Herbicides

We are opposed to the use of pesticides and herbicides because of their potential harm to than-target species. The BLM plan considers the use of chemicals to rehabilitate *upland* vegetation. Although *the* plan indicates caution with regard to these treatments, we are strongly opposed to this option. The long-term effects of these chemicals and imbalances they create are not known with enough certainty to be worth the risk.

We strongly urge that such treatments not be used and that they be avoided at all costs in any watershed area (e.g., that of Aravaipa Creek). These chemicals could have serious adverse effects on the riparian wildlife communities dependent on these watersheds. we recommend that alternatives to such treatments be found.

Finally, in the interest of protecting human population, we recommend that input from nearby residents be sought before deciding to spray in an area.

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NATURAL HISTORY MUSEUM
of Los Angeles County

Section of Mammalogy
5th June 1990

900 *Exposition Boulevard*
Los Angeles, California 90007

Mr. Steve Knox
RMP Team Leader
Safford District Office
Bureau of Land Management
425 East 4th Street
Safford
AZ 85546

Dear Mr. Knox,

As a result of a telephone conversation with Dianne drobka, I have learned that my original comments on the Safford District RMP and EIS draft were not received in your office.

As a researcher involved in ongoing studies of the bat guano accumulations in Eagle Creek Cave, I fully support the nomination of Eagle Creek Bat Cave for possible listing as an ACEC. I believe that this is justified on two separate grounds;

1) Eagle Creek Bat Cave supports the largest colony of the bat Tadarida ~~brasiliensis~~ in the State of Arizona. The protection of this maternity colony is important to the status of the species in Arizona.

2) Eagle Creek Bat Cave contains a deposit of stratified bat guano that is seemingly unique in the Southwest in its value for retrospective analyses of bat population size and area ecology.

In view of these considerations, I believe the Preferred Alternative is clearly the most appropriate, since it protects the bats, the guano deposits, and the immediate surroundings of the cave which the bats must use. Alternative B would be equally acceptable, and would serve to protect other bat colonies in the canyon, but would probably not significantly improve the protection of Eagle Creek Bat CAve itself. Alternative C is, in my opinion, unacceptable since it does not protect the unique scientific value of the gauno deposits.

I hope these comments may be of some value to you,

Yours sincerely,

Donald A. McFarlane

Donald A. McFarlane PhD
Research Associate and
Adjunct Professor.

George C. Page Museum, Hancock Park, 5801 Wilshire Boulevard, Los Angeles, California 90036, (213) 857-6311
William S. Hart Museum, Hart Park, 24151 San Fernando Road, Newhall, California 91321, (805) 254-4584

158

Safford District BLM
425 E. 4th Street
Safford, AZ 85546

June 5, 1990

Dear BLM:

I have read the draft Resource Management Plan for the Safford District and would like to make the following comments:

First, this plan does not adequately address the extremely destructive practice of grazing on public lands. It is a well documented fact that grazing causes severe degradation of the land in terms of soil erosion, vegetation & habitat destruction and general unsightliness. Your plan claims to be in favor of preserving and protecting the land, therefore all lands near and adjacent to sensitive riparian areas (such as Aravaipa Canyon) should be protected by the elimination of grazing in those areas.

Second, I oppose the rebuilding or construction of any roads, especially the Virgus Canyon Road. This one in particular is a ridiculous idea. The road is currently covered with boulders in one area and generally overgrown with vegetation making the job of re-opening it a major task. More importantly, however, this road would open up access to the nearby Aravaipa Canyon Wilderness Area recently approved by Congress, making it impossible to manage as a wilderness area. Re-opening the road would encourage OHV's to go into the area and "do their thing": driving off road and generally destroying the area. I am strongly opposed to this road. It should be left as is and allowed to continue its return to a natural wild condition.

Thank you for the opportunity to comment on this plan.

Sincerely concerned,

Lainie Levick

Lainie Levick
12120 E. Snyder Road
Tucson, AZ 85749

159

Jim Walsh
143 W. Franklin St.
Tucson Az 85701

6-5-90

Steve Knox
BLM - Safford
425 E. 4th St.
Safford, Az 85546

Dear Mr. Knox

In regard to the BLM's Safford District RMP, I have the following comments.

First, the proposed reopening of the Virgus Canyon Road must be rejected. The road was closed in the 1970's for sound environmental preservation reasons which are even more urgent today. As our remaining intact wild areas are relentlessly whittled away it makes sense to try and preserve the most unique and sensitive places. As a tributary to Aravaipa Creek, Virgus Canyon must remain inaccessible to the destruction and pollution which inevitably accompany ORV access. Opening the plateau to ORV use is inviting mayhem on the fragile ecosystem of the southern Aravaipa watershed.

159-1 Secondly, I must protest the extent to which cattle grazing is allowed by the RMP. There is no longer any debate about the incredibly destructive impact of grazing cattle in the arid west. Native ecosystems have been decimated across the region, notably in the Safford District and, as you certainly are aware, there is growing public sentiment to protect public lands from the devastation that accompanies livestock grazing. The "preferred" alternative reflects the narrow interests of the Bostrick-heavily subsidized ranching industry at the expense of the vitality of our declining native ecosystems, particularly the remaining riparian areas. Far more area deserves protection from livestock than are included

RMP Comments
J. Walsh
143 W. Franklin St
Tucson Az 85701

in the plan. I urge you to revise the plan to reflect a more responsible management of the district's riparian areas and exclude livestock from such sensitive, environmentally significant places. Such an exclusion can and should represent, moreover, the beginning of a phaseout of grazing on BLM lands altogether by the year 2000. The lands are simply far too destructive to be allowed to continue their assault on our public lands in this enlightened age.

I appreciate the opportunity to comment and would like to receive the next draft of the plan as well as any subsequent documents

Sincerely,

Jim Walsh

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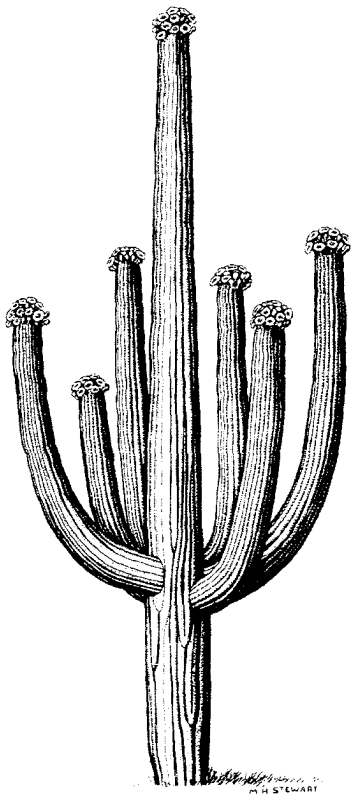
Steve,

Please recognize the obvious devastation that grazing has on our public lands, Preserve all habitats where there are threatened or endangered species, restore habitats for threatened & endangered species, recognize the riparian areas as the globally endangered ecosystems they are.

Please Stop surface occupancy mining & ban the use of ORVs off roads in all ACECs. It's our birth right & should be enjoyed not destroyed.

Thank you

Randy S. Kagan



161

Ray Brady, District Manager
Safford District Office
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

RE: Safford District Resource Management Plan - Environmental Impact Statement

Dear Mr. Brady;

We have served on the Arizona Game and Fish Commission and were involved in reviewing land management plans for the federal agencies. We continue to have an interest in wildlife and its management as well as the management of the public lands.

For a number of years one of the Commission's major concerns was access to the public lands. You may be aware that during his tenure Commissioner Adams chaired an Access Committee made up of representatives from sportsmen's groups, the livestock industries and the agencies involved in managing lands. The Committee presented a report to the Commissioners and after a great deal of discussion at several publically noticed meetings an Access Policy was adopted by the Commission on December 4, 1987 (copy attached).

Because of our work in this area we are pleased that the Bureau addressed Access as the number one issue (page 23) in the preferred alternative (Alternative A). We urge that the District Transportation Plan be developed and implemented within the shortest possible time frame. Item #4 of the Commission Policy speaks to keeping existing roads and trails that provide lawful access to, and upon, public roads open and/or available for use. This appears to be the intent of the Bureau as outlined under this issue; we support this intent.

We are aware that many of the rural roads that have been used for up to 100 years never had a legal right-of-way - they started as wagon roads and now "legal" rights-of-way need to be determined. We believe that the Bureau has a number of mechanisms that can be used in obtaining these rights-of-way. We are concerned about those roads that have been allowed to deteriorate thus precluding access into a vast area of public domain land. We believe that this, in essence, has created "wilderness" even though the land has not been officially designated as such by Congress. We endorse the proposed Action #7 that would provide for the reconstruction of roads including Virgus Canyon, Jackson Cabin Road and East Turkey Creek. This is not a new position for us. Mr. Adams, as Chairman of the Commission's Access Committee, sent a letter to Keith Cook, then Gila Area Manager, in September, 1987 supporting Mr. Cook's efforts to keep access to the Muleshoe Ranch.

161-1 We hope that a discussion of the Back Country Byways program will be part of the scoping of the Transportation Plan. Mr. Cy Jamieson, BLM director, has spoken to the increasing demand for recreational opportunities on public lands and indicated this was one program that could provide both educational and recreational benefits.

161-2 We would like to express concern in another area. The availability of water for wildlife is vital to its survival. With the projected increase in wilderness, the addition of a number of ACECs and several large grazing permits in non-use status, we feel it is imperative to delineate who is to be responsible for the maintenance and development of waters. Allowing waters to deteriorate so that water is no longer available for wildlife is unacceptable. We feel that when waters have been allowed to become non-functional they must be repaired, the responsibility for future maintenance assigned, and then the use monitored.

We are concerned about the Game and Fish Department's ability to manage wildlife in wilderness areas. We would hope that they would, in cooperation with the Bighorn Sheep Society and the Bureau, have the ability to construct, reconstruct and maintain the waters so vital to the survival of not only the sheep but also all other wildlife. The Department's ability to carry out other vital management programs, such as surveys, must not be compromised by wilderness designation. We support the prompt review and updating of the various Habitat Management Plans for the District (Management Concern 1 - Wildlife Habitat #10, page 31.)

We believe that Alternative A will fulfill the policy declaration of Section 102(8) Public Law 94-579 (1976). We appreciate the opportunity to comment.

Cordially,

Larry D. Adams

Larry D. Adams
1511 Highway #95
Bullhead City, AZ.
86442

Frances W. Werner

Frances W. Werner
3216 A. Jackson Ave.
Tucson, AZ.
85719

xc: Steve Knox
ENCL: 1

6/7/90

EVAN MECHAM, Governor

Commissioners:
FRED S. BAKER, Elgin, Chairman
LARRY D. ADAMS, Bullhead City
FRANCES W. WERNER, Tucson
THOMAS G. WOODS, JR., Phoenix
PHILLIP W. ASHCROFT, Eager

Director
TEMPLE A. REYNOLDS

Assistant Director
DUANE L. SHROUFE

ARIZONA **GAME & FISH** DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

September 29, 1987

Keith L. Cook
Gila Area Manager
U.S. Dept. of Interior
425 E. 4th street
Saffosd, AS. 85546

Dear Sir,

I am in receipt of your letter to The Nature Conservancy concerning access to the Muleshoe Ranch. AS you are aware, access to public lands is very high on the priority list for the Arizona Game and Fish Department as well as the Game and Fish Commission. I applaud and appreciate your efforts for the citizens of Arizona concerning the Muleshoe. If there is anything I can do to assist you on the Muleshoe closure, or with any other access problem on public lands, please let me know.

Please keep me advised as to your progress on the Muleshoe.

Sincerely yours,

Larry D. Adams

Larry D. Adams, Commissioner
AZ. Game and Fish Department

cc: Fred S. Baker
Frances W. Werner
Thomas G. Woods
Phillip W. Ashcroft
Temple A. Reynolds
James C. deVos

An Equal Opportunity Agency

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
SAFFORD DISTRICT OFFICE
425 E. 4th Street
Safford, Arizona 85546

(602) 428-4040

IN REPLY REFER TO
1782.12
(044)

August 31, 1987

Mr. Ken Wiley
The Nature Conservancy
300 E. University Blvd. - Suite 230
Tucson, Arizona 85705

Dear Mr. ~~Wiley~~ Ken

We received your memorandum concerning access on the Muleshoe Ranch and appreciate the opportunity to comment on it. We continue to have a concern about the limited public access on the ranch. We have had some complaints about the limited access and it is our understanding that the Game and Fish Department has also had complaints. Regardless of the number of complaints or their nature, we feel very strongly that free unrestricted access should be available for the public to their lands. When we first started working on the Muleshoe exchange with the State, access was an issue that we were concerned with. We did not want to acquire a lot of land that the public could not get to and enjoy. Before the exchange was consummated, we were assured by the Conservancy that public access along the Jackson Cabin Road would be provided. This subject was also brought up to the Safford District Advisory Council and they were assured that these newly acquired lands would be available for the public to enjoy and use. We feel the current restraints (locked gate requiring keys and times set for entry and exit) are unnecessary restrictions on people wishing to enjoy these public lands.

When there were no restrictions to access or use of the Muleshoe Ranch before TNC became involved, our personnel observed little serious impacts caused by recreation use through Bass Canyon. We believe the few problems that occurred without any control can be solved with less inconvenience to your staff and to the public. There is not a problem of people passing through the creek corridor, only of them stopping to camp or driving off the road onto private land. If you believe that occasional vehicle traffic causes serious impact to riparian or aquatic habitats we would like to invite you to inspect the insignificant impact caused by dozens of vehicles using the five crossings through Aravaipa Creek daily.

The Nature Conservancy is right to be concerned about the current condition of riparian habitat in Bass and Hot Springs Canyons. The Bureau has placed riparian habitat protection near the top of its priorities at national, state and district levels. However, I believe that your proposed restrictions place an unnecessary work load upon your staff, inconvenience the public who wish to enjoy their land, and create an unfavorable image for what otherwise appears to have been an excellent land exchange. The Forest Service's Safford Ranger District has indicated they desire to maintain unrestricted public access on the Jackson Cabin Road as well.

We suggest the existing gate off the county road be left unlocked with an Arizona Game and Fish Department sign-in station at this point. The Bass Canyon crossing should be identified as private property and closed to camping and off-road driving or hunting, the road corridor itself could be temporarily fenced to prevent straying. This would free your staff of ecologists from a "public greeting and ticket taking" responsibility, and encourage hunters to pass through your reserve to the public lands beyond.

Access along and near the El Paso and All American Pipeline route will very shortly be an issue we will get more involved with. BLM expects any day to receive title to the remaining State land here. We believe that there is a need for vehicle access between Soza Mesa and the Hooker Hot Springs area. We have not discussed with All American Pipeline their concern about sabotage of their block valves, but at this point we feel that fencing these valves or other security measures is a better alternative than to closing off 10 miles of access roads through the area. Old maps show a road running down Hot Springs Canyon and onto the north side about 1 mile below Wildcat Canyon. We would prefer a road out of Hot Springs Canyon for obvious reasons and would like to evaluate alternate routes with affected parties in the future.

The Bureau is joined with the Nature Conservancy in protecting this very important and critical riparian habitat area. Your goals of preserving these critical elements you identified when you acquired the Muleshoe are much the same as the Bureaus goals when we retained and acquired approximately 26,000 acres. However, the Bureau of Land Management is required to provide access to the "Public Lands" for the public who are the majority owners of what we refer to as the Muleshoe Ranch.

Again, thank you for this opportunity to comment on this very important concern. We at the BLM Safford District Office look forward to working with The Nature Conservancy through a cooperative management agreement for the protection of the Muleshoe.

Sincerely,

Keith L. Cook

Keith L. Cook
Gila Area Manager

cc: Cecil Sims
District Ranger
Safford Ranger District
P.O. Box 709
Safford, AZ 85546

John Holcomb
Wildlife Manager
AZ Game and Fish Dept.
Star Rt. 1, Box 50
Willcox, AZ 85643

Tice Supplee
Habitat Specialist
555 N. Greasewood Rd.
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Kevin L.R. Strege
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756 N. Monterey SC.
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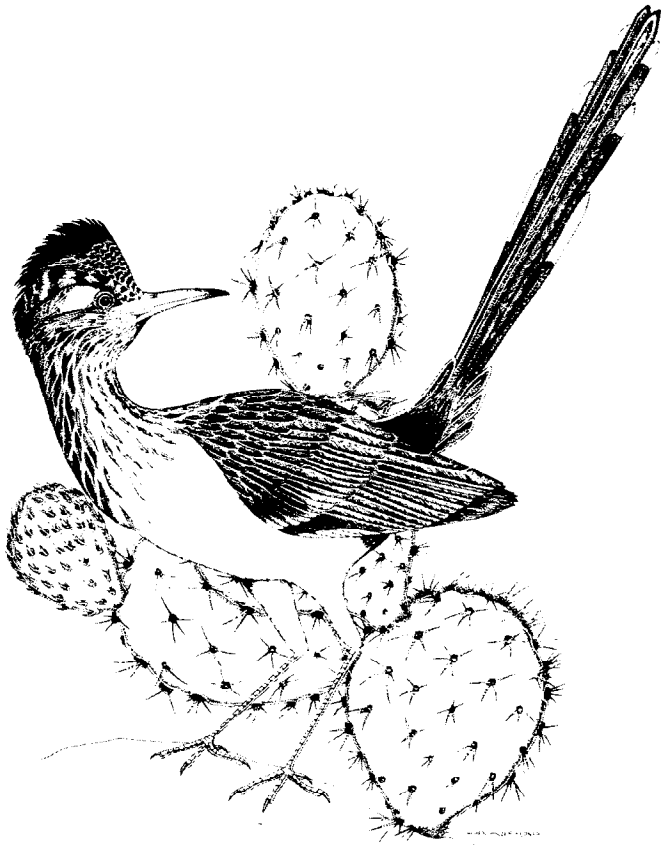

ARIZONA GAME AND FISH DEPARTMENT

NO.: J12
Effective: 12/04/87
Revised:
Page: 1 of 2
Approved:

COMMISSION POLICY

Access To And Upon Public And State Trust Lands

POLICY:

It is the policy of the Arizona Game and Fish Commission to place high priority on preserving existing access to public and state trust lands for hunting and fishing, and to place high priority on improving access to such lands in areas of the state where access to such lands is currently difficult or nonexistent. For purposes of this policy, the Commission define* the term "public and state trust lands" as those federal public and reserved lands, state trust lands, and other lands within the State of Arizona, owned, controlled or managed by the United states, the State of Arizona, agencies or political subdivisions thereof upon which hunting and fishing are lawful.

By this policy, the Commission directs the Department to:

1. Identify specific access problems and their causes throughout the State:

2. Prioritize specific access problems in the order of importance of their solution:

3. Plan a method of approach for solving the problem to be addressed;

4. Confer with, and seek the cooperation of private landowners and land management agencies in the process of addressing the access problem selected for solution;

5. Exert every effort to keep existing roads and trails that provide lawful access to, and upon, public and state trust lands open and/or available for use. The Commission recognizes that, in some areas of the state, too many such roads exist and directs the Department to support the lawful closure of Such roads in those cases where the Department finds itself in substantial agreement with the appropriate land management agency or authority involved:

6. Exert every effort to obtain the availability of new roads established for the purpose of aiding commercial endeavor where such roads resolve, or aid in resolving, access problems identified by the Department, provided the Department supports the lawful closure of roads deemed excessive and unnecessary:

7. In accordance with sound principle* of natural resource management, develop, maintain, or improve - where the geophysical characteristics of the land and the costs of such development, maintenance. or improvement are not prohibitive, and are lawful - new road*, trails or other rights-of-way that will either connect existing roads or trails or provide new roads or trails that solve access problems identified by the Department;

a. Use 24-hour-per-day access as a guideline and goal in the process of preserving or improving existing access or developing new access, where such access is lawful;

9. Where Standards for road density are needed as guidelines in the process of addressing access problems, use standards that are in keeping with the land-use plan of the land management agency or authority involved. If that plan is in the process of formulation or revision, use standards that the Department intend* to recommend for inclusion in the plan. If no such plan is utilized by the agency or authority involved, determine appropriate density in cooperation with the appropriate land management agency or authority: and,

10. Establish, at the Commission's direction, a Landowner/Lessee/Sportsman Relations Committee whose purpose shall be to provide suggestions for reducing and resolving conflict* between private landowners, lessees of public and state trust lands, and sportsmen.

The mission* of various natural resource management agencies, the rights of private landowners, existing law and principles of natural resource management are but a few of the factors that come to bear on the process of solving access problems. The Commission recognize* that any definition of "reasonable access" must be made on a case-by-case basis, taking into account all of the pertinent factors bearing on each case. I" reference to roads, trails, and other rights-of-way, reasonable access amount* to the ability to develop for use, roads, trails, and other rights-of-way as directed in this policy.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, CA 94105

8 JUN 1990

Mr. Ray Brady
District Manager
Safford District
Bureau Of Land Management
425 E. Fourth Street
Safford, AZ 85546

Dear

The Environmental Protection Agency (EPA) has reviewed the proposed SAFFORD DISTRICT DRAFT RESOURCE MANAGEMENT PLAN, 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 SAFFORD DISTRICT DEIS identifies and analyzes four alternatives for managing the resources on 1.4 million acres of public lands in southeastern Arizona, which are administered by the Bureau of Land Management. The four alternatives are: (A) Preferred Alternative -- provides for consumptive use and development of resources while also providing protection to sensitive resources; (B) More Protective Alternative -- emphasizes management and protection of natural and cultural resources while providing for use of public lands: (C) Less Protective Alternative -- emphasizes use and development of lands and provides less protection of natural and cultural resources; (D) No Action Alternative -- continues current land use managment.

We have classified this DEIS as Category EC-Z -- Environmental concerns, Insufficient Information (see enclosed "Summary Of Rating Definitions and Follow-Up action'). our rating reflects concerns we have regarding the existing watershed conditions and surface water quality in the Safford District. We support the designations of Areas of Critical Environmental Concern (ACECs), wildernesses, and wild, scenic, or recreational rivers, as we believe that these will protect and enhance the natural resources of the district. We have serious concerns, however, about the direct. indirect, and cumulative impacts that certain activities within the district and its area of influence will have on these

8 JUN 1990

resources. These activities include livestock grazing, mineral and energy development, agricultural irrigation, and off-highway vehicle use.

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) 556-6387, or have your staff contact Jeanne Dunn, Office of Federal Activities, at (415) 556-5104.

Sincerely,

for Deanna W. Wieman, Director
Office of External Affairs

Enclosures

dcn: 90-090

CC: Carol Russell, ADEQ

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action 8 JUN 1990

LO—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 alternative or 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 a-d those of the ly 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."

SAFFORD DISTRICT DRAFT RMP/EIS
EPA COMMENTS -- 1990

8 JUN 1990

Air Duality

1. The FEIS should discuss the National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments applicable to air quality in the Safford District.

2. For each alternative, the FEIS should identify the activities that might impact air quality (e.g., sand and gravel extraction, other mining activities, fire management, Off-Highway Vehicle (OHV) use). It should also consider any cumulative impacts to NAAQS and PSD increments resulting from activities on BLM land in the district and other pollutant sources such as smelters in the district's vicinity.

Water Quality

1. The Affected Environment Water Quality information on page 129 cites the 1984 water Quality Assessment prepared by Arizona Department of Health Services (ADHS) pursuant to section 305(b) of the Clean Water Act. section 305(b) reports are prepared on a biennial basis. ADHS subsequently prepared a Water Quality Assessment in 1986, and Arizona Department of Environmental Quality (ADEQ) prepared a Water Quality Assessment in 1988. More importantly, ADEQ prepared a Nonpoint Source Assessment Report (SAR) in 1988, pursuant to Section 319(a) of the Clean Water Act. Arizona's SAX, approved by EPA on August 28. 1989, provides the following information which should be cited in the Affected Environment Water Quality section of the FEIS.

- 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 affected in the Safford BLM District by nonpoint sources include the Gila River (grazing and resource extraction), the San Simon River (irrigated agriculture), and the San Pedro River (grazing, resource e&action and irrigated agriculture).

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 (SIP), which was approved by EPA on January 4, 1990. Arizona'* SMP identifies federal programs and activities subject to the Federal Consistnecy 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 Bureau of Land Management (BLM) programs identified in Arizona's SMP include: watershed projects; mineral exploration and development: coal, oil and gas leasing: 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 Practice* (BMPs) to enable full protection of beneficial uses of surface waters, attainment of surface water quality standards, and compliance with the antidegradation provision* of 40 CFR 131.12.

We strongly encourage BLM to work closely with ADEQ to satisfy BLM's obligations under the Federal Consistency requirements of Section 319 and we expect that BLM's development of a memorandum of understanding (MOU) with ADEQ will serve to facilitate this process and encourage BLM to establish this as a priority. The MOU should contain the procedure* 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 will be fully protected, that surface water quality standards will be attained, and that there will be no further degradation of surface water quality.

We would like to take this opportunity to recognize BLM's active involvement in ADEQ's Grazing BMP development committee and BLM's work on protecting riparian areas as positive efforts to control nonpoint source pollution from BLM lands.

3. We understand that the existing detention dams in the San Simon and Bear Spring Flats basins have been effective in preventing additional head-cuts upstream by facilitating the

recovery of riparian vegetation through replenishment of *hallow groundwater aquifers. Accordingly, we support the construction of the Timber Draw Dam and the repair of the Oso Largo Detention Dam. However, additional effort*, including reductions in animal units on grazing allotments in these watersheds, will be necessary to control nonpoint source impacts on water quality in these basins. We encourage BLM to work closely with ADEQ on the** restoration efforts.

4. We support the BLM's proposed suitability evaluation of Aravaipa Creek, Mescal Creek, Redfield Canyon, Swamp Springs Canyon, Hot Springs Canyon, Bass Canyon, Turkey Creek, Deer Creek, and the left fork of Markham Creek for Unique Waters designation*. This measure would constitute an effective step toward protecting the quality of these waters. However, we also recommend that BLM evaluate Wildcat Canyon, Double R Canyon, and Grapevine Creek for suitability for Unique Waters designation, as recommended in Alternative B. In addition, we encourage BLM's monitoring of these waters to include appropriate bioassessment method*, such a* the macroinvertebrate assessment method developed by the U.S. Forest Service, and any appropriate biological monitoring and assessment method* which have been developed by EPA pursuant to Section 304(a)(8) of the Water Quality Act of 1987. These waters may prove to be appropriate reference water bodies for Arizona's development of biological water quality standards over the next three years.

162-1

5. Appendix 11 should include the frequency of monitoring and the specific parameters that will be monitored at the water quality testing sites. we recommend that, at a minimum, monitoring be conducted annually and that parameter* to be monitored in surface waters include nutrients and all of the parameter* for which Arizona has water quality standards. BLM should consult with ADEQ in the design of the monitoring program. BLM should also carry out bioassessments in surface waters that are potentially affected by nonpoint sources. 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.

162-2

6. Appendix 7 lists the public lands that meet Federal Land Policy and Management Act (FLPMA) requirement* for sale or exchange. EPA is concerned that some of the parcel* (e.g., those near Glenbar, San Jose, and San Simon) may include waters of the United State*. Because the public lands identified generally

162-3 have potential for economic development, any waters of the United States within these parcels could eventually be affected by residential, commercial, or recreational development. The FEIS needs to identify which parcels, if any, include waters of the United States, particularly major drainages such as the Gila and San Simon rivers.

Livestock Management Issues

EPA believes that this RMP should expand on the existing baseline information and the issues relating to livestock management in the district. Most of the resources managed under the Safford District Resource Management Plan (RMP) -- water quality, soil erosion, vegetation and wildlife habitat, ACECs and riparian areas, cultural and socioeconomic resources -- have the potential to be significantly affected by livestock management. Livestock grazing in the Safford District is managed through allotment management plans (AMPs), most of which were developed out of decisions based on the Upper Gila-San Simon Grazing EIS (BLM, 1978) and the Eastern Arizona Grazing 1986). EPA's concerns regarding the 1986 Eastern Arizona Grazing EIS (as expressed in our December 6, 1985, and October 29, 1986, letters to BLM's Arizona State Director) were never adequately addressed. Our comments on the EIS focused on: the lack of existing information regarding water quality and riparian habitats; the consequences of grazing on water quality, soil erosion, and riparian habitats; and appropriate management practices to avoid impacts from livestock. It may be beneficial for BLM to maintain flexibility in updating the AMPs in order to accomodate management changes necessary for the protection of the district's resources.

162-4

162-5 1. The FEIS should describe the connection between the livestock management activities and resources addressed in the grazing EISs and the activities and resources managed under this RMP. We recommend that the FEIS briefly summarize the district's AMPs and the special livestock management practices currently implemented in sensitive watersheds or in watersheds in unsatisfactory condition. The FEIS should also discuss the criteria used to revise allotments and animal unit months (AUMs). The FEIS should also discuss how much flexibility BLM has in implementing the AMPs and how this would affect implementation of this RMP.

162-6 2. A map of current and future grazing allotments and their respective categories ("Improve," "Maintain," and "Custodial") would also prove useful. This map, coupled with one indicating watershed conditions and soil erosion potentials, would greatly enhance the FEIS as a public disclosure document.

162-7 3. The 1986 Eastern Arizona Grazing EIS called for monitoring the grazing management program to determine the effectiveness of grazing treatments and new rangeland developments and to determine whether AMP objectives are being met. The FEIS should discuss the parameters that have been monitored and thoroughly explore any trends that are apparent from the monitoring data collected in the grazing districts over the last several years.

4. In light of the potential significant impacts from grazing on water quality, we suggest the following measures be identified for implementation in the FEIS.

162-8

- Include special provisions in grazing allotment plans to reduce the number of animal units in allotments during drought conditions.

- Use fencing or other methods to exclude livestock from all riparian areas. Livestock access to riparian areas has a significant negative impact on water quality due to trampling of stream banks and consumption of riparian vegetation.

162-9 5. The FEIS should identify the measures that will be taken to implement "appropriate" livestock management in order to protect the San Simon River floodplain (DEIS, page 39).

162-10 6. Under the preferred alternative, most of the proposed ACEC designations -- Black Rock Research Natural Area (RNA), Bonita Creek, Gila Box, Turkey Creek Riparian, Table Mountain RNA. Desert Grasslands, Bear Springs Badlands, Guadalupe Canyon Outstanding Natural Area (ONA), Bowie Mountain Scenic, Coronado Mountain RNA, Wilcox Playa National Natural Landmark (NNL), 111 Ranch RNA, and Peloncillo Mountains ONA -- do not include livestock exclusions. Most of these would not even be subject to individual livestock management plans. Several of these ACECs include riparian areas or unique plant associations. The FEIS should identify the proposed ACECs in which grazing currently occurs or potentially will occur in the foreseeable future and evaluate for each ACEC the impacts that livestock grazing would have on riparian habitat, water quality, soil erosion, vegetation, and wildlife.

Soil Resources.

162-11 1. At least 49,680 acres of severely eroded soils have bee" identified in the Saffcrd District (DEIS, page 127). What factors have contributed to the severe soil conditions observed (e.g., overgrazing, roads, mining)? The FEIS should summarize not only existing soil/watershed conditions, but potential causes as well, so that appropriate measures may be determined to stabilize or improve soil erosion conditions.

162-12 2. The FEIS should indicate how continuation of seasonal livestock use in the Bear springs Flat area will serve to accomplish stated soil erosion and salinity management objectives (DEIS, page 39). Potential impacts to soil erosion and water quality should be discussed.

162-13 3. The DEIS states that soil erosion studies would be conducted at Hot Well Dunes to determine the effects of OHV use, and OHV use will be limited if erosion becomes unacceptable. The FEIS should identify the baseline information and evaluation criteria to be used in the studies and define the term, "unacceptable," i" the context of soil erosion at Hat Well Dunes (DEIS, page 40).

162-14 4. Although the proposed watershed and soil treatment areas are delineated on Map 34 of the DEIS, the DEIS does not include any maps depicting watershed conditions or soil erosion potentials throughout the district. It is difficult, therefore, for the reviewer to judge whether or not the proposed watershed and soil treatment areas adequately protect the watersheds that are in poor condition or soils that are susceptible tc wind and water erosion. The FEIS should include maps shoving watershed conditions and soil erosion susceptibility throughout the district.

Vegetation.

162-15 1. The DEIS states that vegetation manipulation will be used to decrease invading woody plants and increase grasses and fcrbs for wildlife, watershed condition, and livestock (DEIS, page 40). It is not clear what these "invading" species are or whether they are native or "an-native. The FEIS should specify the direct and indirect adverse and beneficial effects that vegetation manipulation would have on wildlife, native vegetation, soil stability, and water quality. It should also indicate how livestock will be managed in areas where listed threatened and endangered (T&E) plant species are reintroduced.

162-16 2. The FEIS should more thoroughly discuss the direct and indirect impacts of firewood cutting in each of the areas specified for the four alternatives. The FEIS should also identify what other vegetative products would be available to the public pursuant to issuance of a permit.

Wildlife

162-17 1. The DEIS states that under the No Action Alternative predator control would only be permitted in *areas* where *evidence* of extreme depredation of livestock is documented. Is this the only condition that currently triggers such activities? The FEIS should discuss the activities involved in animal damage control and the criteria used to determine the need for animal damage control.

Riparian Areas

162-18 1. Water quality monitoring will be conducted in selected riparian areas listed in Appendix 11 (DEIS, page 29). It is not clear why certain ACEC riparian areas are not included in this list. Furthermore, livestock apparently are permitted to graze in Gila Box and Guadalupe Canyon, but these stream segments are not included in the monitoring program. The FEIS should discuss the criteria used to determine which stream segments in the district should be monitored for water quality.

162-19 2. Table 2-23 indicates that construction and/or repair of dams will benefit soil resources, but the DEIS provides "c other information on adverse or beneficial affects of dam *construction* and/or repair on water quality, riparian or upland vegetation, or wildlife habitat. The FEIS should provide this information.

Wilderness

162-20 1. According to the DEIS, impacts to range, wildlife, timber, recreation, lands, soils, vegetation, cultural, fire, water, mineral, energy, air, and visual resources are not expected to result from either the Aravaipa Canyon or Galiuro wilderness additions for any of the alternatives. social and economic impacts and impacts to livestock grazing are also expected to be minor. It is "at clear, therefore, why the complete study areas for both wildernesses are not recommended in the preferred alternative. EPA believes that wilderness designations for the complete study areas would benefit affected water quality, riparian habitat, vegetation, wildlife, and soil resources. The FEIS should dis-

cuss the reasons why, give" the results of the wilderness studies, the entire study areas are not being recommended in the preferred alternative.

Wild and Scenic Rivers

The DEIS does not explain the basis for selection of the "No Action" alternative for wild, scenic, or recreational designation of the Gila Box segments of the Gila River. According to the DEIS, air, water, soils, vegetation, wildlife, fire management, visual, cultural, and paleontological resources would not be adversely affected by wild, scenic, or recreational designation, and many would in fact benefit through the protection that a designation would offer. The DEIS also anticipates very minor impacts to livestock grazing and energy and mineral resources. EPA believes that the resources in the vicinity of the study areas would be better protected and enhanced by designation of the Gila Box as wild, scenic, or recreational. The FEIS should discuss why, given the results of the designation evaluation, the Gila Box study area* are not being recommended in the RMP's preferred alternative.

Lands and Realty

162-22 1. The DEIS states that the terms and conditions to be applied to right-of-way grants for corridors and communication sites and for use outside of corridors and communication sites were analyzed in the planning process for the Safford District RMP 8). The FEIS should identify the terms and conditions to be applied to utility corridors and communication sites.

162-23 2. The FEIS should provide more information on the proposed designations of communication sites and the existing utility lines as corridors for future utility needs. The purpose of the l-mile wide utility corridors should be explained. Aside from the segment of the San Pedro corridor where it crosses the San Pedro Riparian Natural Conservation Area, are there other segments of any of the proposed corridors that should be narrower than one mile across? If utility corridors and communication sites are to be designated in the FEIS, their environmental, cultural, and socio-economic impacts must be fully evaluated. Any mitigation measures necessary to protect the district's resources from adverse impacts of these designations should also be discussed.

162-24 3. The acquisition of up to 108,562 acres of private and state lands may occur under the preferred alternative. We understand that site-specific environmental assessments are prepared for each acquisition. EPA recommends that the FEIS discuss how BLM will determine whether any of the lands proposed for acquisition contain sites where hazardous wastes were disposed of in past years. The presence of hazardous wastes could diminish the habitat and public recreation values of the proposed acquisition. Furthermore, once the lands contaminated with hazardous wastes become BLM property, BLM may become a responsible party under the terms of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, Pub. L. No. 96-510 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. NO. 99-499 (SARA). BLM could the" be legally responsible for remedial investigations, cleanup activities, and full or partial cleanup costs.

Access

162-25 1. The FEIS should evaluate the adverse and beneficial impacts of the proposed road reconstruction projects. Soil erosion and water quality are of particular relevance.

162-26 2. The FEIS should indicate what measures will be take" to rehabilitate eroded areas where roads will be closed. what steps will be taken to stabilize and revegetate denuded areas?

Off-Highway Vehicle Use

162-27 1. EPA strongly supports the proposed closing of sensitive areas to OHVs. The use of OHVs, especially in riparian areas, can be a significant nonpoint source of pollution. While limiting the use of OHVs to designated roads on most of the remaining portions of BLM land would have a beneficial impact on water quality, we have serious concerns as to whether such a restriction could be enforced, given the extensive area that BLM manages. A better terms of nonpoint source control, would be to close all riparian area watersheds and areas of high erosion potential to OHVs.

2. The FEIS should describe the current condition of the Hot Well Dunes and include a" inventory of vegetation and wildlife species and populations. The FEIS should also evaluate the impact of OHV use at the Hot Well Dune area on air quality, water quality, soil stability, vegetation, wildlife, and paleontological resources to determine whether this area should be open to

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OHV use. The FEIS should discuss how baseline information would be collected in this area and how further monitoring would be conducted in order to assess the impacts of OHV use in this area.

162-29 3. The FEIS should discuss any indirect impacts to tree and cactus populations resulting from OHV access and illegal collection of plants in potentially critical areas.

Energy and Minerals

162-30 1. We strongly recommend that the mining restrictions and acreages in Alternative B be adopted as part of the FEIS preferred alternative. Water bodies in the Safford District are currently affected by nonpoint source pollution from resource extraction activities. These restrictions should significantly improve water quality relative to the mining restrictions under Alternative A. In addition, we recommend that mining restrictions, including prohibition of sand and gravel operations, be implemented in all riparian areas to protect water quality.

162-31 2. It is not clear in the DEIS why Alternative A does not include the Turkey Creek Riparian ACEC or the Swamp Springs-Hot Springs Watershed ACEC among the list of areas that would be subject to withdrawal from mineral entry, "no surface occupancy," or prohibited sale of mineral materials. According to Table 2-1, mining plans would be required for these areas. Under alternatives A and B, all riparian areas are proposed as subject to prohibition of mineral material sales and a "no surface occupancy" stipulation.

162-32 3. The FEIS should include information on the impacts of mining in the district in the past and foreseeable future (i.e., the period during which this RMP applies). It should specify for the entire district: 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 in the district. The FEIS should also evaluate the impacts of mining in these areas and discuss any mitigation measures that are necessary to protect water quality, soil resources, vegetation, and wildlife (including desert big horn sheep). The FEIS shoud discuss the value of mining restriction in riparian areas such as Turkey Creek Riparian ACEC and swamp Springs-Hot springs Watershed ACEC.

8 JUN 1990

4. The FEIS should include a discussion of BLM's stipulations for exploration, development, operation, and reclamation of mining areas.

Cumulative Impacts.

162-34 1. We have serious concerns about the cumulative impacts to surface water quality, soil resources, riparian habitats, vegetation, and wildlife attributable to proposed and ongoing activities in the district. The FEIS should discuss the cumulative impacts to these resources from activities such as agricultural irrigation, livestock grazing, mineral extraction, and soil and vegetation treatment projects throughout the district and its area of influence, not just in ACECs and other special management areas.

Future NEPA Documents.

162-35 1. We understand that several NEPA documents currently are being independently prepared or will be prepared pursuant to guidance provided by this RMP. These documents include the Fire Management Activity Plan; habitat management plans: livestock allotment management plans; site plans for communication sites: recreation management plans far Special Recreation Management Areas; activity plans to rehabilitated soil erosion areas; management plans for use and conservation of water; District Water Quality Management Plan: Paleontological Resources Management Plan: and project-specific pesticide/herbicide management plans based on the EIS, "Vegetation Treatment on BLM Lands in 13 Western States," currently being prepared. We request that BLM notify EPA when any of these environmental assessments (EAs) or EISs are released for public review.

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The Arizona Native Plant Society

Box 41206 Sun Station
Tucson, Arizona 85717

June 4, 1990

Mr. Steve Knox
Bureau of - Ssfford District
426 E. 4th Street
Safford, AZ 86446

Dear Mr. Knox:

The Tucson Chapter of the Arizona Native Plant Society welcomes the opportunity to comment of your proposed Resource Management Plan for the Ssfford District. We hsv. indexed our comments to specific pages in your draft plan.

163-1 Page 18. We to your proposed plan. livestock grazing on the 6,651 acre area rithi" the San Pedro Riparian Nation.1 Conservation Are.. Your proposed action contradict. the intent of Congress to prohibit livestock grazing within the NCA for a period of 16 year. as specifically mentioned in the Committee report. when the NCA bill was passed by Congress. ASPS request. that the area be withdraw" from livestock grazing in accord with Congressional intent.

163-2 Page 24. Wc oppose the reconstruction of Virgus Canyon Road. Left Pork of Markham Crock Road, Jackson Cabin Road snd East Turkey Creek Road. These roads in sensitive riparian watersheds and reconstruction snd increased use will facilitate increased erosion and siltation problem. within key riparian areas. Reconstruction of East Turkey Creek Road is especially inappropriate due to the presence of Erigeron piscaticus, a Category 2 plant currently known from only 2 locations in the world: Fish Canyon Mountains and Turkey Creek at the . ast end of Aravaipa Canyon. I" light of the paucity of information available on thi. species, a prudent course of action would be to avoid any action. which are likely to increase vehicular travel and uncontrolled visitor us. in the area.

Page 24. ANPS strongly supports the Ssfford District'. proposed ACEC designations especially Bonita Creek ACEC, Oils Box ACEC, Turkey Creek ACEC, Table Mountain ACEC, Desert Grassland ACEC, Dry Spring ACEC, Swamp Springs-Hot Springs Watershed ACEC, Eagle Creek ACEC, Willcox Playa ACEC and Guadalupe Canyon ACEC. regarding ACEC management prescriptions are:

163-3 Bonita Creak ACEC: Language related to livestock grazing is conspicuously absent. We suggest that livestock grazing to exclude livestock from the riparian corridor between May snd September

The Arizona Native Plant Society

63-4 of as part of the management prescription.

Turkey Creek Ripsris" ACEC: If this ACBC is retained, (see our comments below regarding an expanded Aravaipa Canyon ACEC), "manage livestock" se a management prescription strikes ludicruou.. It i. that "manages livestock" on all their lands. We recommend that livestock be excluded from this ACEC due to the fact that the ACEC boundary area include. the riparian corridor of Oak Grove Canyon and Turkey Creek and efforts to protect this area that do not drastically reduce livestock usage are cosmetic.

Desert Grassland ACEC: Language should be added that specifies that the no action. will be permitted that increases livestock use above historical usage.

Swamp Springs-Rot Spring. Watershed ACBC: ANPS strongly supports no livestock se part of the management prescription.

We also recommend the designation of the Aravaipa Canyon Watershed ACEC as proposed in Alternative B. and importance criteria used to justify the designation of the Swamp Springs-Rot Spring. ACEC within the Arsvsip. Canyon Watershed ACEC. Wc also recommend that livestock grazing be excluded or reduced from those portion. of the expanded ACEC in which permittees are receptive to such action.

The Ssfford District's planning effort. with respect to the ACPC program set. the standard for the BLM throughout Arizona. ANPS strongly supports the development of site-specific plans for each designated ACEC. I" areas designated as rildcr"... the dropping of ACEC designation but draw attention to tb. need to carry the management prescriptions identified i" the RMP forward in the Wilderness Management Plan.

163-6 Page 29. The existing road. and trail. be included within the final RMP document.

163-7 Pan. 29. Program objectives snd certain action. for Riparian Areas could benefit from an implementation tintable that is shorter than th. length of the planning period. Riparian Ares management should receive priority management attention which should be reflected in the final pl." through an implementation schedule. We recommend that the action. 2,3,4,6 and 7 be completed within a 3-5 period.

163-8 Page 31. ANPS strongly supports proposed State/Private land acquisition, especially those land. which support high quality riparian habitat, watershed. of important riparian areas and T&E species habitat. ANPS urge. the BLM to give special consideration to acquiring additional lands within the riparian corridor of the Ssn Pedro River from Be"."" to the Oils River confluence including significant sit..

The Arizona Native Plant Society

Box 41206 Sun Station 85717

along major perennial tributaries to the San Pedro River. The San Pedro River NCA should be seen as the building block upon which protection of the entire San Pedro River system can be affected.

63-9 Page 40. ANPS requests that BLM include language that emphasizes the use ot native species on vegetation treatment actions.

Page 40. Refer to USFWS - ESO for a complete list of Sensitive plant species to ensure that all species are properly categorized 2) and referred to in the RMP using currently taxonomic nomenclature. A listing of documented and suspected sensitive species within the Safford District should be included as an Appendix. This is now standard information provided by all LMP and RMP documents.

163-10

63-11 We find reference to a monitoring plan and its attendant guidelines to be conspicuously absent from the draft RMP. ANPS draws your attention to the the fact that this was grounds for an appeal of the Lower Gila RMP. Please include appropriate reference to monitoring in an Appendix.

overall, the Tucson Chapter of the Arizona Native Plant Society supports the preferred alternative of the Safford District subject to the aforementioned recommended changes. Ye appreciate the opportunity to provide input into the land management planning process on the public lands.

Sincerely,

Barbara Tellman

Barbara Tellman
President, Tucson Chapter

cc: ANPS Conservation Committee

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Draft Safford District Resource Management Plan

Public Comment Form

Issue/Management Concern: Access

Comment: The Turtle Mountain Allotment had tremendous potential for grazing which is yet undeveloped. The area needs to have a road constructed which would connect the Bunnett Canyon road to the Bull Gap road in order to develop and maintain the range improvements necessary to properly distribute cattle on the allotment. The area will soon be released from WSA status and at that time we would hope to work cooperatively with the BLM in order to modify the allotments AMP. In addition to construction of the new road (approx. 2 mi), existing roads in Trujillo Canyon and Smith Canyon need maintenance. These road projects are critical to the maintenance & development of improvements which could make this allotment much more manageable. These proposals would also benefit the areas wildlife and watershed values. Construction of this very critical road should be included in the RMP. Thank you for this opportunity to comment on this very important issue.

164-1

Name: Jeff Menges
Representing: Slash Hook Cattle Co.
Address: PO Box 792
Morenci Az 85540
Date: June 10, 1990

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Bureau of
Safford District
425 E. 4th Street
Safford, Ariz. 85546

Date: June 12,1990

Re: Comment - Resource Management Plan

The South Rim allotment, with its proximity to Aravaipa Canyon Wilderness and its own brand of rugged beauty,has the qualities and potential of being a spectacular national wildlife and recreational area. It is with this thought in mind that I make the following comments.

Historic grazing on the ranches which now make up the South Rim allotment traditionally used and heavily depended upon, (for water and forage), the riparian corridors as an integral part of their grazing systems.

Water improvements are few, but in addition to this, the deeply broken character of the topography makes it difficult for cattle to travel either to waters or to effectively utilize the available feed.

The map I enclosed attempts to illustrate the location of permanent water during dry periods in Turkey Creek. Without extensive steel rim and pipeline distribution systems the pastures adjacent to Turkey Creek cannot be adequately watered during these periods. At the same time, it is difficult to say if Turkey Creek would contain enough water to support such a system. Dirt tanks in the vicinity are mostly small and contain water only periodically.

Under previous grazing systems cattle were permanently located into "pastures" whose boundaries were dictated mainly by the features of the natural terrain, and the calves were gathered annually. This system degraded the range, but good years brought good profits.

It is my feeling that the scope of improvements plus the amount of management necessary for this allotment to be brought up to a level of acceptable impact, will not be a profitable venture.

165-1 I agree with an ACEC designation for Jackson (Oak Grove) Canyon, but I also feel that the portion of Turkey Creek which lays in Section 5 upstream from the corral,(see map), should be included in this prescription. In addition, this section of riparian corridor should be removed from the periodic grazing to which the adjacent portion of Turkey Creek is subjected to. The area is not used as either a corridor of cattle movement nor does it contain surface water during the driest times of the year. Its narrow gorge does contain well developed oak, sycamore,and ash trees, and I have sighted Mexican Spotted Owls there for several years.

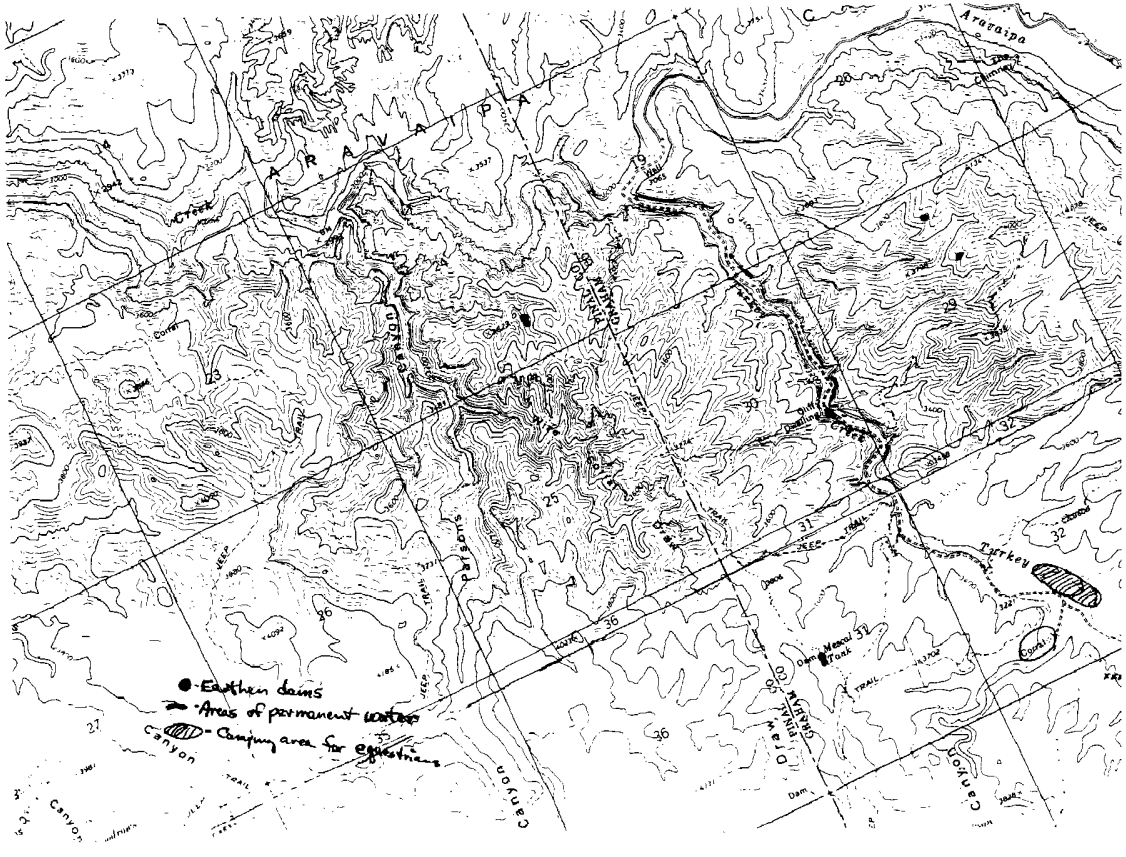
The Turkey Creek-Mammoth road has steadily increased in popularity over the years and it represents a valid recreational use of the public lands. As rough and deteriorated as this road is it seems to have a special attraction and challenge to some, and is just rugged and scenic to others. For this reason I believe that it is important to leave this road in a primitive condition. The BLM should encourage volunteer efforts by ORV organizations to periodically repair the worst sections of road by hand. Cattleguards should be installed to the greatest extent possible.

I also feel that no additional roads should be opened to public motor vehicle access on the allotment until the BLM has adequately inventoried the biological and archaeological resources of the area, and has assessed the needs of lower impact (equestrian,mountain bike) recreational uses.

165-2 Equestrian use has also increased over time. With the limitations placed on livestock recreational use in the wilderness, plus the occasional conflicts with other wilderness users, it is important that equestrian use not only be accomodated, but promoted on the south rim of Aravaipa Canyon. Turkey Creek already offers an alternative, but I feel that improving facilities suchas the two corrals in upper Turkey Creek, (not used in current AMP operation), and the trails into the adjacent uplands would make it a spectacular alternative. With the formation of use agreements or exchanges with certain landowners, similar opportunities exist for the allotment's west end.

John C.and Norma Tapia Luepke
Box 53 Klondyke R.S.
Willcox, Ariz.85643

John C. Luepke
Norma Tapia Luepke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Bill McGibbon
President, Green Valley
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Jim Webb, Phoenix
*Deceased

Arizona Association

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

June 12, 1990

Knox, Leader
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear

The Arizona Cattle Growers' Association (ACGA) appreciates the opportunity to comment on the draft RMP/EIS for the Safford District.

PROFITABLE GRAZING:
Ye might suggest that in all BLM plans, we feel that one essential objective should be "profitable grazing" When this objective is reached, many positive things can be achieved on the public lands.

ACCESS:
The issue of access is one of great concern. The ACGA recommends that all existing roads and trails be left open. Even the roads which require four-wheel drives are very important. Roads provide permittees feasible means of developing and maintaining range improvements. These improvements enhance grazing distribution, wildlife populations and watershed values. Many areas in the Safford District need additional roads for construction of additional range improvements. These roads give a greater percentage of the public the chance to see and enjoy the public lands. Only a small percentage of the public have the health and wealth required to backpack into areas which are inaccessible by vehicle.

166-2 ACEC'8 GENERAL:
The ACGA is very concerned with the excessive number of ACEC's and the excessive "umber of acres within the ACEC's proposed in the plan. These special management units will further reduce the "umber of acres of multiple use lands that are so critical to the economies in rural Arizona. Ye are also concerned that the National Park service may assume management of many of ACEC's and include them in the National Park System. This would impose further restrictions on the land and further economic restraints on rural economics. Ye are concerned that the additional funds required to manage these special units (ACEC's) may further deplete the amount of funds available for range improvements and range management.

Until these many questions and concerns have been resolved. the ACGA cannot support the creation of these ACEC special management units.

Mr. Steve Knox
June 12, 1990
Page 2

ACEC'S - OBJECT TO GRAZING EXCLUSION
More specifically. one of our main concerns with the plan is the proposed exclusion of grazing on the Muleshoe and Aravaipa ranches which are owned by The Nature Conservancy. The ACGA opposes the exclusion of grazing within these large ACEC's which include:

1. Muleshoe Ranch
   a. Alternative A- 22,883 acres on the Swamp Spring-Hot Springs Watershed ACEC. p.26
   b. Alternative B- 33.287 acres on the Muleshoe
   c. Alternative C- 9,926 acres on the Muleshoe Riparian ACEC. p.65

2. Aravaipa Ranches
   a. Alternative B- 78.028 acres on the Aravaipa Watershed ACEC. p.44
   b. Alternative C- 46,268 acres on the South Rim ACEC. p.64

The ACGA would support Alternative action) on these allotments and urge that cattle grazing be returned to the allotments. Some ACGA members have expressed a willingness to graze these allotments. We disagree with the concept that livestock grazing should be "excluded to facilitate rehabilitation of the riparian and upland vegetation communities within the ACEC".p.193 Objectives of this type can be met through properly managed livestock grazing. Total economic loss to local economies which would result from exclusion of livestock grazing in these areas would be in excess of $500,000 per year.

3. Dry Spring RNA-ACEC
   a. Alternative A- 825 acres. Gila River p. 25
   b. Alternative B- 825 acres. Gila River p. 45
   c. Alternative C- 90 acres. Gila River p. 64

   The ACGA opposes the recommended grazing exclusion for Dry Spring RNA-ACEC

4. Eagle Creek Canyon ONA-ACEC
   a. Alternative B- 9,451 acres. p. 46

166-3 More than half of the land in the proposal is privately owned. A designation of this type would infringe on the private property rights of the land owner. this proposal because of the private property within the area.

WILD AND SCENIC RIVERS:
The ACGA supports the Wild and Scenic River Alternative, "1. No designation alternative (no action)" which states that no acreage would be recommended for designation under the Wild and Scenic Rivers Act in the areas.

RESOURCE MONITORING:

166-4 The concerned that there is no thorough resource monitoring established in any alternative described in the plan. Definitive resource reference points such as sight specific, clearly described plant community and soil condition baseline data are needed for monitoring wildlife population levels. wildlife impacts on habitat, grazing/wildlife interaction and other values important to a sight specific ecosystem. We are concerned with the omission of specific and measurable resource criteria. The ACGA strongly supports an integrated resource monitoring program.

ARIZONA GAME AND STRATEGIC PLANS:

166-5 Although there are several references to the strategic plans of the Arizona Game and Fish Department, the plan does not address rho has the ultimate responsibility for the resource and it's protection. Over population of any wildlife species has negative impacts on the resource. The plan should address realistic wildlife population levels and include clarification of the influence of wildlife management under this plan on intermingled lands. We object to the alternative in the plan wherein the Safford District BLM relinquishes their ability to protect the resource by allowing the strategic plan of the Arizona Game and Fish department to drive a single use of the resource at the expense of other multiple uses.

COMMENTS ON APPENDIX 6 PAGES 247 TO 249:

1. **RIPARIAN/AQUATIC HABITAT AND SPECIES DEPENDENT ON RIPARIAN/AQUATIC HABITAT:**

166-6 The ACGA supports the enhancement of riparian/aquatic habitat use. Riparian habitat management must be considered as part of the whole resource context, including surrounding uplands. There is ample data developed by the BLM that demonstrates livestock grazing can occur on riparian areas without damaging riparian areas and when properly managed will maintain and enhance the riparian/aquatic habitat. Ye suggest language be added to the plan acknowledging the importance of riparian areas to livestock grazing and riparian management as one part of the total resource.

2. **SPECIES IDENTIFIED FOR REINTRODUCTIONS IN FISH AND WILDLIFE SERVICE PLANS:**

The ACGA supports a collaborative process for the consideration of wildlife reintroductions. The collaborative process should be described in the plan. Consideration should be given to impacts on each multiple-use by reintroduction and their impact on the local economy as well as the potential for endangerment of human life.

166-7 3. **DESERT TORTOISE:**

There is considerable data developed which show that grazing is not the primary factor in the concern for survival of the desert

4. **BIGHORN SHEEP:**

166-8 The ACGA finds the language unclear as to how the increase in the Bighorn Sheep population in the Eagle Creek area fits with other multiple use, including grazing. in that area. We support integrated resource management to address these specific wildlife levels.

5. **MULE DEER:**

166-9 The ACGA has reports from our members that mule deer populations are heavily impacted by an excessive predator population in the Safford District. The livestock industry is on record that Arizona's Mule Deer populations are low. Vegetation management can enhance habitat, but. as a study on a specific Mule Deer herd in the Sierra Nevada illustrated, uncontrolled predators reduced the herd from 17,000 animals to 7,500 within a relatively short period of time. This issue has more components than are described in the plan and needs to be restated.

6. **OAK WOODLANDS AND SPECIES DEPENDENT ON OAK WOODLAND HABITAT:**

166-10 The plan does not provide resource criteria for the goals stated. Ye refer to our comments on reintroduction of species relative to Item c. The statement that bear populations would be benefited by improved habitat conditions raises several concerns. Nuisance bear and lion on the Safford District are already a problem which are not addressed in this plan. The ACGA supports management of bear and lion population level.6 in relation to their native prey population levels.

7. **WETLANDS:**

The ACGA finds the management goals too general. Ye further object to the acquisition of private property by the Federal Government. It is not demonstrated that there is a need for additional wetlands in this district. Additional wetlands that would serve migrating waterfowl may be available at a lower cost in other areas.

8. **OTHER SPECIES**

The ACGA supports the Safford District in managing priority species on public lands. In the Safford District there are many intermingled lands and adjoining lands that would be influenced by management prescriptions developed by this plan. We support an integrated approach in the development of management criteria.

Please advise us of any other comments that affect livestock grazing. and please keep us informed as to the significant dates for additional input as this plan is finalized.

Sincerely,

William A. McGibbon
President

167

Tucson Rod and Gun Club

P.O. BOX 12921 TUCSON, ARIZONA 85732

District Manager
Bureau of La"* Management
4425 E. 4th Street
Safford, AZ 85546

June 12, 1990

Subject: Safford District Resource Management Plan (RMP)
Attention: Mr. Steve Knox, RMP Team Leader

The review copy of the Safford District Resource Management Plan (RMP), Environmental Impact Statement (EIS), DRAFT, is a" impressive workproduct by a public agency management team. The agency and personnel responsible for this valuable resource document are to be commended. Their commitment to the highest professional standards is evident and signals a" important dedication to the fullest possible development of subsequent, more specific activity plans.

Tucson Rod and Gun Club (TR&GC) appreciates the opportunity to comment and requests that it be provided with all notices and publications pertaining to the adoption end implementation of the final plan.

On March 23rd of this year our organization submitted a prepared statement to the Rational Public Lands Advisory Council at its meeting in Tucson. A copy of that statement is attached and is submitted as a portion of our comments on the Safford District RMP/EIS.

ISSUE 1 - ACCESS

167-1 Tucson Rod and Gun Club (TR&GC) supports the access acquisition alternatives identified in Alternative A (The Preferred Alternative,. TRRGC also supports the addition of the area in the vicinity of Portal, T. 16 S., R. 31 R., Sec. identified in Comments from AG&FD Region V (locked gate preventing access to BLM and Forest Service lands,.

TRhGC is especially pleased to see the Jackson Cabin Road. about 5.1/2 miles, identified for reconstruction to provide vehicle access up to the Rational Forest boundary. I" addition, acquisition of legal administrative access on the Pipeline Road end its mainenance to a I-wheel drive standard is supported by the TRRGC .

ISSUE 2 - AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)

TR&GC supports Alternative A in 15 of the 17 ACECs es proposed with the following two (2) exceptions:

Bonita Creek *ACEC*: Consideration should be give" to designation per Alternative B for the entire 30,240 acre watershed as an ACEC. This single deviation from the Preferred Alternative allows for the management of the interconnected uplands and streambed for the Bonita Creek watershed.

Gila Box Outstanding Natural Area ACEC: TRhGC supports Alternative R specifically to close the river bottoms to off-highway vehicle use. Only necessary administrative access should be allowed for the management of the ACEC.

Our organization agrees with the recommendation for Congressional designation of a segment of the Gila River from a point about 2 miles above Dripping Spring Wash to Winkelman for inclusion in the Rational Wild end Scenic River System.

ISSUE 3 - OFF-HIGHWAY VEHICLES

TRRGC supports Alternative A as proposed in the RMP/EIS.

ISSUE 4 - RIPARIAN AREAS

TR&GC supports Alternative A as proposed in the RMP/EIS. Our organization interested in the development of the riparian inventory system baseline conditions. This system baseline data will be crucial to the protection of water rights on perennial streams or rivers as well as the water rights on springs and ponds.

MANAGEMENT CONCERNS 1 - 10, INCLUSIVE

TRRGC supports the Management Concerns objectives and actions as proposed in Alternative A in the RMP/EIS. Wildlife habitat management and the development and protection of available waters, ponds or springs must be a management priority. We view the Concerns es parts of the "hole. TRRGC expects federal and state agencies to cooperate to the fullest extent practicable in the Wildlife and Habitat Management Plans.

state-level actions or • "e"ts implementation of any final plan. First, Arizona Governor Mofford created on way 18, 1990, by Executive Order a Governor's Task Force on Environmental Impact Assessments. Timing and impact of the implementation of an Arizona mini-RRPA for state agency actions or for any public agency allocating state or federal monies can't be determined et this time. California's experiences with its' CEQA have not bee" without controversy in its application to wildlife management and depradation control programs.

Secondly, a group has taken out an initiative, No.12-I-90, to place on the November ballot a proposal to ban the use of leghold traps, snares, poison, flammable or pyrotechnic device on any state or other public land. Again the impact or implications of the proposal can not be defined at this time. As of this date it can't be determined if the group will be able to file the required signatures by the July 5, 1990 deadline.

Lin Hall

Lin Hall, President
Tucson Rod and Gun Club
on behalf of the Officers and Executive Board

Tucson Rod and Gun Club

P.O. BOX 12921 TUCSON, ARIZONA 85732

Statement of the Tucson Rod and Gun Club
prepared for the Record of
National Public Lands Advisory Council
Hotel Park Tucson, Tucson, Arizona
Friday March 23, 1990

The Tucson Rod and Gun Club is a sportsmens' organization committed to balanced public policies for the protection of Arizona's wildlife and for the protection of the natural habitat supporting viable game and nongame populations. Our over 3,200 family members represent the demographic diversity that has been a cornerstone of organized participation in Southern Arizona natural resource management policy. Our members enjoy hunting, fishing, camping, hiking and backpacking in developed and primitive settings throughout Southern Arizona. Our members enjoy natural scenic areas and the elusive opportunity to savor the experience of quality solitude.

As sportsmen and responsible citizens we are committed to:

> The highest level of legal and physical access compatible with multiple use management. Access to or across public lands as well as access to or across private lands is to be achieved and maintained by cooperative, good faith negotiations.
>
> The development of comprehensive plans for the long-term management of our States' wildlife by working with public and private entities for the best balance of conservation and multiple use resource development.
>
> The fullest possible public participation at all stages of the process from conceptualization to implementation.

The Tucson Rod and Gun Club is a party to a public lands use agreement and we appreciate the dynamics at play in our changing society. Because we are a beneficiary of a broad multiple use policy, and understand the expense related thereto, we expect all conditions or terms of agreements entered into by public agencies with other private parties or organizations will be uniformly and expeditiously enforced without exception. Specifically, we demand that all agreements and conditions pertaining to physical and legal access to public land be enforced to the maximum extent permitted in law, regulation or contract. Further, we expect without exception, evasion or trick that agreements for the maintenance and protection of water rights and maintenance of water delivery systems and hardware to will be enforced as agreed.

The Officers and Executive Board of the Tucson Rod and Gun Club appreciate the opportunity to submit this statement for the record. We ask that a copy of the record for this meeting be made available and, further, that the Club be added to the mailing list for all notices of meetings, programs and publications of the National Public Lands Advisory Council or any of its committees or working groups.

Robert Bayne
Tucson Rod ~~and Gun~~ Club
Executive Board Member

168

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th Street,
Safford, AZ 85546

Dear Mr. Knox,

Thanks for this opportunity to comment on the Draft EIS for the Safford District, and I appreciate your extending the comment period. I have lived within the district for two years and traveled extensively within it ever since I've lived in AZ. I will comment on only a few places in this letter.

The BLM Safford District manages the best riparian areas left in the desert southwest. All riparian araes left in the state should be protected as the national treasures they are. I would encourage you to protect the entire Eagle Creek watershed as wilderness with no possibility of further mining.

I would like to see protection for the Gila River downstream of Coolidge Dam to Winkelman and the Gila Box, especially from ORV use.

Aravaipa does not need any more access roads or trails. I oppose unrestricted travel in the Aravaipa watershed. Of course, limited foot and horse travel is fine (as under the current wilderness designation) as is non-motorized travel. Reconstructing Virgus Canyon Road and gaining legal access to the west end of Aravaipa Wilderness (Plan B, Issue 1, sections 7a and 8a) will only increase the ORV use in the area, and will subsequently increase dust, trash, air and noise pollution, vegetation and wildlife destruction (increasing stress on desert bighorns, Mexican black hawks?) and most importantly soil erosion. In a watershed with resources such as Aravaipa (best example of native flora and fauna in the state, including fish, birds, and large mammalian predators) any threat must be minimized. At the upper end, I feel that East Turkey Creek Road (Plan A Issue 1, section 7f) should not be reconstructed for the same reasons. This road would allow upper Turkey Creek (with its perennial pools, native fish, and Mexican spotted owls) to become trashed like the lower end. The report mentions closing Oak Grove Canyon to ORV use (Plans A, B, and C), but since it is pretty much inaccessible anyway, I would rather see upper Turkey Creek closed to ORV's.

168-1 It seems to me that your objectives are inconsistent with continued cattle grazing. The report says that restoring native grasslands is one objective of the BLM Safford District, yet I don't see how this can be accomplished with continued grazing. The damage cattle cause on our public lands (alteration of both soil structure and biological communities) cannot be tolerated. Do we know enough about the ecosystem function of cryptogamic soils to have cattle trample them away? I would suggest a rest for the Aravaipa watershed for at least the life of this plan. Another objective I would like to see materialized is the reintroduction of endemic species, especially endangered endemics

168-1 such as the Mexican wolf. Cattle grazing should be discontinued on public lands, since this conflicts with your stated objectives. In addition, I don't believe that cattle ranching should be subsidized by taxpayers. If ranchers were charged the market price for grazing public lands, they would find it uneconomical. Eliminating public lands grazing in the West, which produces only 1.6% of our beef production would have little effect upon the industry as a whole or the economy of the region. Therefore on economic grazing should be discontinued.

Thank you,

Matthew R Brown
1029 S. Wilson #14
Tempe AZ. 85281

169

Caryl Mary Williams
1029 S. Wilson Avenue, #14,
Tempe, AZ 85287

Steve Knox, RMP Team Leader
Bureau of Land Management
425 E. 4th Street,
Safford, AZ 85546

Dear Mr. Knox,

Thanks for this opportunity to comment on the Draft EIS for the Safford District, and I appreciate your extending the comment period.

As a student of native fish biology, I have been intimately involved with many areas under consideration in this plan. My Master's work at ASU is on the migration of native fishes in Aravaipa Creek, and as such this area is my main concern.

I oppose unrestricted travel in the Aravaipa watershed. Of course, limited foot and horse travel is fine (as under the current wilderness designation) as is non-motorized travel. Reconstructing Virgus Canyon Road and gaining legal access to the west end of Aravaipa Wilderness (Plan B, Issue 1, sections 7a and 8a) will only increase the ORV use in the area, and will subsequently increase dust, trash, air and noise pollution, vegetation and wildlife destruction (increasing stress on desert bighorns, Mexican black hawks?) and most importantly soil erosion. In a watershed with resources such as Aravaipa (best example of native flora and fauna in the state, including fish, birds, and large mammalian predators) any threat must be minimized. At the upper end, I feel that East Turkey Creek Road (Plan A Issue 1, section 7f) should not be reconstructed for the same reasons. This road would allow upper Turkey Creek (with its perennial pools, native fish, and Mexican spotted owls) to become trashed like the lower end. The report mentions closing Oak Grove Canyon to ORV use (Plans A, B, and C), but since it is pretty much inaccessible anyway, I would rather see upper Turkey Creek closed.

Another important issue is cattle grazing. The report says that restoring native grasslands is one objective of the BLM Safford District, yet I don't see how this can be accomplished with continued grazing. The damage cattle cause on our public lands (alteration of both soil structure and biological communities) cannot be tolerated. Do we know enough about the ecosystem function of cryptogamic soils to have cattle trample them away? I would suggest a rest from grazing for the Aravaipa watershed for at least the life of this plan. Another objective I would like to see materialized is the reintroduction of endemic species, especially endangered endemics such as the Mexican wolf. It seems to me that some of your better objectives (restoring grasslands and reintroducing endemic species) are inconsistent with continued grazing.

169-1

During the course of my work here in Arizona, I have also had the pleasure of working on the Gila River. Hikes I have taken up Bonita and Eagle Creeks have emphasized the importance of riparian habitat to creatures of the desert. The bat caves up Eagle Creek are an important nursery ground for the species, and as pollinators for saguaros (with far ranging, possibly flood-dampening root systems), the bats play an important role in the Sonoran desert ecosystem. To allow mining in the watershed of the nursery would surely destroy the nurturing attributes that it now holds. I feel the bat caves and the entire Eagle Creek watershed should be preserved.

I'm glad to hear that Bonita Creek now holds beaver again. The native Gila intermedia may yet make a comeback. The watershed of Bonita Creek should be preserved as a model system of a desert stream. Many aspects have been studied intensively, and in that regard can be likened to the Hubbard Brook Experimental Stream (New Hampshire).

In the Gila Box, a treasure of eastern Arizona, there should not be ORV use. That region of the Gila River may well serve as a refugia for native fish, and could be a prime reintroduction site sometime in the future.

Again, thank you for this opportunity. I look forward to being informed of any updates of the plan, and the final draft when it is prepared. Good luck!

Very sincerely,

Caryl Mary Williams

170

ELIZABETH T. WOODIN
3600 N. LARREA LANE
TUCSON, AZ 85715

RESPONSE MEMORANDUM

TO: Ray A. Brady, District Manager
Bureau of Land Management, Safford District Office
425 St.
Safford, Arizona 85546

FROM: Elizabeth T. Woodin, representing - self

RE: Draft Safford District Resource Management Plan

DATE: June 12, 1990

The Saffcrd District of the BLM should be highly commended for a well thought out and comprehensive draft RMP. Such praise is especially appropriate in light of the many complex and controversial issues involved in formulating a plan of this scope.

Preferred Alternative A demonstrates the Bureau's keen awareness of the necessity of management role in the protection of Arizona's few remaining riparian areas from the many human pressures brought to bear on them. It was those pressures which were largely responsible for the extirpation of 95% of the riparian habitat which existed in the state before the advent of anglos. Preferred Alternative A quite adequately addresses the BLM's mandate for multiple use, but does so keeping in mind the best and most appropriate us** for those areas of cultural richness which are particularly fragile and easily prone to degradation. There are, however, several areas which I feel are not as well reflected in Preferred Alternative A as they could be.

First, with regard to the Muleshoe CMA and particularly Issue #1 - Access, I applaud the decision to acquire legal access to the pipeline road for administrative purposes only. That route was carved out for construction purposes, along a mostly straight line with no regard for the geographical contours in its path. As such it has great potential for erosion and for endangerment to personal safety and is therefore inappropriate as a public access route. The Jackson Cabin Road, a safer and more environmentally sound access corridor. Most people wishing to explore the Muleshoe would naturally follow such a south to north path as they would want to move towards Mountains and the Wilderness Area.

The prescription for management of lands on the Muleshoe as outlined in Preferred Alternative A's Swamp-Springs - Hot Springs Watershed ACEC is generally worthy of support and shows a great deal of sensitivity to the many unique features for which the Muleshoe is being carefully managed by the Forest Service, the Bureau of Land Management and The
The I would take to as described would be in the

RESPONSE TO DRAFT SAFFORD DISTRICT OF
FROM: Elizabeth T. Woodin

170-1 boundaries in the north and south ea
Springs area. That latter feature sho
nor should sections 29 and 32 in the
Those sections contain drainages into
its hydrological and riparian integri
ACEC. In addition, I
Canyon from the ACEC.

One I would have regar
for the unique concentration of ripa
is mining. A closure of those fragile
rich but not particularly mineralogi
another important step towards the ki

to the proposed manage
seem to me that Alternative B best a
values for which it is renowned. Hell
an important tributary to Aravaipa C
beautiful, unusual and fragile ripari
under in either Preferred Al
inclusion of the North Rim country in
with the Wilderness Plan for Aravaipa
table lands in order to most adequate
vegetational integrity of Aravaipa Ca
spelled out with regard to Alternativ
be incorporated into such a plan. The
one which is rather impractical to co
sufficient water to the table lands a
forage for the cattle in ord
zone along Turkey Creek. It is hoped
other livestock allotments will be re

In conclusion, I have learned a great
information provided in the Safford D
forward to the District's response to
offered that opportunity for comment.

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El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

June 12, 1990

Mr. Steve Knox
RMP Team Leader
Bureau of Land Management
425 E. 4th street
Safford, AZ 85546

Re: Draft Safford District Resource Management Plan and Environmental Impact Statement

Dear

Natural Gas Company one largest natural gas transportation systems, located in the southwestern United States. Since a number of El Paso's pipelines and compressor stations are within the Safford District, we have a vital interest in the Bureau of Land Management's (BLM's) land and resource management planning for the district.

We are particularly interested in two proposed special management areas that are crossed by existing El Paso pipelines:

- Muleshoe Ranch - El Paso's to Ehrenberg Line crosses this area. proposed for development of a Coordinated Resource Management Plan, for 7 miles.'
- Bowie Mountain Scenic ACEC - El Paso's 26" O.D. California Mainline and adjacent 30" O.D. California First Loop Line cross this proposed Area of Critical Environmental Concern (ACEC) for approximately 1.5 miles.

171- MuBLMhoe Ranches establishing the Muleshoe Ranch as a right-of-way avoidance area. El Paso is concerned about the impact this designation could have on possible future expansion along its Waha to Ehrenberg Line. Should a second pipeline prove necessary in tlie future, El Paso would favor locating it adjacent to its existing line rather using a" entirely new route that avoids the Muleshoe Ranch.

Location of a new line next to a" existing line is desirable for a variety of reasons, not the least of which is reduction of environmental impacts by confining much of the construction-related disturbance to previously disturbed areas. We recommend that the designation of the Muleshoe Ranch as a right-of-my avoidance area be qualified to ensure that possible future location of a new pipeline adjacent to El Paso's existing line is not precluded.

Bowie Mountain Scenic ACEC The Bowie Mountain Scenic ACEC presents a similar situation: BLM proposes establishing the area as a right-of-way exclusion area. No future pipeline adjacent to El Paso's existing two lines crossing the ACEC would be permitted.

171-2 We recommend that this management prescription for the ACEC be modified to permit a future pipeline adjacent to the existing lines if it can be demonstrated that the environmental advantages of paralleling the existing lines outweigh the disadvantages of construction within the ACEC.

171-3 Finally, it appears the proposed Pipeline corridor shown on Map 35 is approximately one mile south of the existing All American Pipeline (and El Paso's 30" D.D. Waha to Ehrenberg Line).

Thank you for the opportunity to comment on the Draft Safford District Resource Management Plan/Environmental Impact Statement.

Sincerely,

John Sproul

John A. Sproul, Jr.
senior Environmental Scientist
Environmental and Safety Affairs Department

380-A

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The Nature Conservancy

The Arizona Nature Conservancy
300 East University Boulevard. Suite 230. Tucson. Arizona 85705
(602) 622-3861

1990

Mr. Ray Brady
Safford District
Bureau of Land Management
47.5 E. 4th Street
Safford. AZ 85546

Dear Mr. Brady,

We appreciate the opportunity to review and comment on your draft Resource Management Plan for the Safford District. 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 broad 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.

Riparian Habitat:

The Safford District contains by many criteria the highest quality riparian habitat found on BLM lands in Arizona, perhaps in the entire Southwestern United States. From a multi-state, and multi-agency, perspective, the Safford District has a disproportionately large amount of riparian habitat. A discussion in the Summary and/or Affected Environment sections emphasizing the extraordinary variety and extent of riparian habitats and species on the Safford District would help put the management attention given to riparian areas in the RMP into regional perspective.

Because the Safford District possesses a" unmatched wealth of riparian and wetland resources, it consequently has a proportionately large responsibility for protecting those resources. The regional importance of these wetland and riparian resources is apparent from many points of view including:

-- The variety of riparian habitats such as Cottonwood-Willow forest, Mixed Broadleaf Deciduous forests, Mesquite Bosque woodland, and Cienega marsh.

-- The number of endangered and sensitive riparian-dependant species including Loach minnow, Spikedace, Gila Chub, Desert Pupfish, Gila Topminnow, Lowland Leopard Frog, Mexican Garter Snake, Gray Hawk, Slack Hawk, and many others.

-- The extent of riparian habitat with many miles of flowing streams along the San Pedro River, Aravaipa Creek, Bonita Creek, Eagle Creek, Gila River, Redfield Canyon, Hot Springs Canyon, Sass Canyon, and others.

-- The amount of recreational use these areas receive with thousands of visitors each year enjoying Aravaipa Canyon, Bonita Creek, the Gila River, and the San Pedro River and the concomitant economic value this provides the state.

We reiterate these points to emphasize that these resources possess much more than just local importance, and must be recognized as such in the Plan.

We strongly support the Safford District in taking the lead in managing riparian resources and associated wildlife habitat values with the riparian management guidelines that are proposed in the RMP (pgs. 29-31, 36 item 5, 247, 249). These management guidelines are among the best that we have see" for riparian areas on BLM land in Arizona. The San Pedro Riparian Conservation Area Management Plan sets a standard for other BLM Districts to follow in managing riparian areas.

We support the Safford District's proposal to acquire additional lands that include key riparian areas and their watersheds and habitat for threatened and endangered species. I" particular, the Conservancy urges the Safford District to consider acquiring additional lands along portions of the San Pedro River and its major tributaries from the Mexico border to its confluence with the Gila River at Winkelman. The information available to us, including information provided by the Arizona Department of Game and Fish's Nongame Data Management System, clearly indicates that additional areas outside the San Pedro River Riparian National Conservation Area should he given top priority for acquisition by the Bureau of Land Management.

Several riparian habitat islands along portions of the lower San Pedro River provide key stepping stones for migratory birds *which have* bee" identified in several studies as critical natural areas which merit protection. Several perennial tributary systems serve as refugia for native fish species and are integral components of the San Pedro River ecosystem that would benefit from greater public ownership and management. The San Pedro River is one of the few undammed, major river systems in the Southwest and the BLM has the opportunity to make a significant contribution to its long term protection.

172-1 The Aravaipa Canyon Wilderness Management Plan (ACWMP) guides management activities for what many believe is the premier natural area on the entire Safford District. However, the ACWMP is not cited in *the* Summary or Description of Alternatives as a

172-1 significant source of management guidance, as are numerous other management planning documents. The ACWMP should be cited in the Description of Alternatives as one of the management guidelines that is common to

Areas Of Critical Environmental concern:

We support the designation of the ACEC's proposed in the RMP to protect rare and sensitive natural resources including riparian and grassland habitat. These proposed ACEC's contain the most outstanding ecological features in the district, and their natural resource values are great despite their relatively small size. They clearly deserve special management consideration, and with the few exceptions specified below, we support the ACEC boundaries and management prescriptions described in the preferred alternative.

The Eagle Creek Bat Cave (pg. 198-199) is known as a" internationally significant bat roost in Arizona. We strongly endorse this proposal because of the site's significance, and because the ACEC management prescription will help reverse the alarming recent declines in bat population in this roost. We recommend investigating the possibility of installing a bat-accessible gate in the cave mouth to keep out vandals or other destructive intrusions.

The Guadalupe Canyon ACEC (pg. 195-196) supports a "umber of species of plants and animals whose distribution is primarily Mexican and which are found in the United States only in southern Arizona. Two rare plants of special interest, Vauquelinia californica var. pauciflora and Coryphantha robbinsorum, are known in the area and may be found in the ACEC. We encourage the Safford District to acquire private inholdings in the ACEC, as they become available. We recommend that management of the ACEC be coordinated with the Coronado National Forest which has designated a Zoological-Botanical Area in the upper reaches of Guadalupe Canyon and the appropriate New Mexico office of the BLM which manages adjacent BLM lands in New Mexico and that the RMP identify this coordination effort.

Coronado Mountain and Willcox Playa ACECs (pg. 197, 199-200) both include plant communities that are unique in Arizona. These two rare plant assemblages, the Arizona cypress-Mexican pinyon community and saline playa community, are indicative of unusual environmental conditions. Protection of small, specialized habitats such as these is critical to managing the entire spectrum of biological diversity on the Safford District.

We are in general agreement with the boundaries and management prescriptions for ACECs as described in the preferred alternative A. with the exception of the Swamp Springs-Hot

Springs and Aravaipa Watershed ACECs which we discuss below.

we feel should be withdrawn from mineral entry and from surface occupancy. Mining exploration and development poses one of the most serious threats to aquatic resources of any land use. Impacts from these activities include toxic spills, increased stream siltation, and erosion induced by excavation and can result in extirpation of aquatic species, especially fish. These impacts are particularly tragic because they are often permanent or slow to recover, costs for attempting to rectify the damage are usually not born by those who create it, and the damage is unnecessary because the mineral values are inconsequential. We discuss this in more detail below for Aravaipa and Muleshoe Ranch ACECs.

Muleshoe Ranch ACEC (pgs. 26, 103-104, 193-194): As participants with BLM at the Muleshoe Ranch Cooperative Management Area we are looking forward to working with the Safford District to manage the ecological resources there, and we support the management prescriptions presented in the preferred alternative. The management prescriptions proposed for this area will accomplish the goals that BLM has identified in the' Muleshoe CMA agreement.

172-2 However, for the Muleshoe Ranch ACEC we propose a modified boundary that is intermediate between those presented in alternatives A and B (see enclosed map). Our revised boundary serves the dual purpose of making the Soza Mesa area outside of the Sot Springs and Cherry Springs watersheds available for livestock grazing, while assuring better protection for a significant portion of the Bass Creek watershed. Using our proposed boundary, two areas within the Sass Canyon watershed, at the north-east and south-east corners of the ACEC, would be in the ACEC.

172-3 For the most part we support management prescriptions for the Muleshoe Ranch ACEC as they are presented in the preferred alternative for swamp Springs-Hot springs ACEC. However, considering the sensitive nature of the riparian values there, we recommend closing the area to mineral entry and to surface occupancy. This is unlikely to conflict with mineral interests because there are no known mineral resources of economic value and there are no active mining claims in the area. The U.S. Bureau of Mines (Mineral Investigation of the Muleshoe Study Area, Cochise and Graham Counties, 1988) concluded that mineral potential in the area is low and the USGS has rated the petroleum potential area Mining claims would pose dangerous impacts to the natural resource values of the ACEC, would be permanent or slow to recover, and would present additional management expense to the BLM or the Conservancy.

Aravaipa Creek ACEC (pgs. 96, 189-191): We recommend adopting the Aravaipa Watershed ACEC boundaries as proposed in Alternative

B. Aravaipa Creek may well be the most significant, most sensitive, and best know" natural resource on the Safford District, and es such it deserves the best possible management. We feel that this can be best accomplished by giving ACEC designation to watershed areas adjacent to the canyon to direct special management attention there.

The importance of the watershed in the tablelands area adjacent to the canyon is emphasized by the increase in stream flow from on the east end to 25 cfs on the west end, suggesting a strong relationship between the hydrology of the tablelands watershed and the stream. Also, Minckley (1981, Ecological Studies of Aravaipa Creek) discusses the-importance of clear-water flows originating in the tablelands that counterbalance the silt-lade" flows from the upper valley to maintain diverse aquatic microhabitat types. This emphasizes the importance of managing the watershed to minimize soil erosion and steam siltation in the tablelands. These hydrologic benefits are derived from both the north and south slopes, and hence ACEC designation should encompass both slopes.

The Aravaipa Canyon Wilderness Management Plan (BLM, 1988) referenced in the RMP on page 33 provides guidance for the management of the tablelands in the Aravaipa watershed for the benefit of the riparian habitat and the wildlife that depend on it. Management objectives stated in the ACWMP are: "To manage the canyon corridor and side canyons so that natural ecological processes continue to repair the poor vegetation condition caused prior to wilderness designation." and "To increase fine fuels on the tablelands (i.e. grasses) to the point that natural fires can return vegetation to grassland conditions." The plan states further that "The major emphasis of wildlife management in the ACW will be on allowing natural processes to control the evolution of the riparian habitat. ... Management of *the* tablelands "ill also be geared to the free operation of natural processes." We believe that accomplishing these goals requires a watershed ACEC, and believe it is only reasonable to insist that BLM tablelands, as referenced in the ACWMP, be managed in a manner that is consistent with that plan.

Special management attention should be given to all land uses and management activities in the Aravaipa watershed. All proposed and existing management prescriptions should be evaluated in the context of managing for riparian and endangered species resource values as the over-riding goal of management in the Aravaipa watershed.

We strongly support the Aravaipa Watershed ACEC management prescription proposed in Alternative B as the best alternative for accomplishing the goals identified by BLM in the ACWMP which guides management of the area. However, the prescription for grazing in the ACEC is somewhat vague. Although we support the

proposed prescription for our Sout
management prescriptions should be
basis for each allotment in the
Management Plans should be writter
accomplishing the ACEC resource

Regardless of the specific
for the Aravaipa Watershed ACEC,
defining Limits of Acceptable Chan
and Wilderness Area goals. *The*
annually and evaluated relative t
should be modified to correct con
Limits of Acceptable Change.

Because of the complexity of
importance of the resources there
a high priority for drafting a

Several management objectives
archeological resources that woul
ecological resources of the Aravai
include patrolling sensitive site
investigations, development of a
resource, end developing a compr
educational program. All of th
the context of current land uses
activities perhaps the most impo
guide other management actions, i
understanding the relationships b
water quality and quantity in th
also address the relationship bet
Sensitive wildlife populations.

We recommend that the Aravai
mineral entry and to surface oc
watershed would place one of the
in Arizona at risk from toxic s
siltation. Closure to mineral ent
conflict with mining interests b
area is low. The U.S. Bureau of
mineral potential and for the mo
minerals. The only site in the
located "ear Table Mountain, is
of the low grade and especially
of. Mines. 1988. Mineral Resources
Graham and Pinal Counties, Arizon
File Report 38-88).

Roads/Access:

We feel that the public shoul

the use and enjoyment of public lands, and we agree with BLM that the means of access should be based on a Transportation Plan with appropriate public input that is designed to assure that sensitive resources are protected from adverse effects (pg. 16). User groups may not realize that we permit public access across our private property to BLM land in several areas including Jackson Cabin road on the Muleshoe Ranch, the east end of Aravaipa Creek, the foot trail at the west end of Aravaipa Creek, and the Table Mountain Pass road from Turkey Creek to Mammoth.

172-4 We oppose the opening of the East Turkey Creek (Ditmars) road (pg. 24) because it would pose a major threat to a significant riparian area, and it would not significantly improve access to any areas that are not already accessible by car. The route is down a steep, unstable hillside of cobbly alluvium that is prone to erosion, and which has bee" determined to be unsuitable for use as a roadway by BLM staff in a 1981 review of the road. Opening a road at this area would lead to increased erosion and sediment deposition in Turkey Creek, with likely adverse effects on the riparian community there, including Erigeron piscaticus which is a candidate for listing as threatened or endangered. Turkey Creek should be closed to OH" use above the point at which the Table Mountain road leaves the canyon bottom.

When proposing to open a road, we feel that BLM should address the additional management effort that will be needed as a result of increased use of newly accessible areas. opening the Virgus Road (pg. 24) would allow vehicular access to sensitive, remote parts of the Aravaipa Creek watershed and would compromise wilderness management in the Aravaipa Canyon Wilderness Area. This is a" important wildlife area and has potentially erodible soils if vehicles are used off of roadways. We feel that it would be inappropriate to open such an isolated, sensitive area unless a commitment is made to devote manpower to patrol and manage it. At a time when BLM is considering reducing the patrol effort of wilderness rangers at Aravaipa Creek, we are concerned that such a commitment might not be possible due to budget constraints.

Page-by-page Comments:

172-5 Pg. 7 Under the Wildlife Habitat management concern the control of exotic fish in natural streams should be added. Exotic fish a one of the major threats to endangered native fish populations.

172-6 Pg. 8 With regard to Recreation, one question that should also be addressed is, as recreational opportunities and facilities are expanded and visitor use grows, what level of staffing and funding will be needed to insure that sensitive resources are not damaged by recreational use?

172-7 Pg. 9 Soil erosion should be addressed as a management concern district-wide, not just in the San Simon valley. Where else in the district should erosion control activities be implemented, and where in the district does erosion pose a threat to sensitive species or habitats?

172-8 Pg. 15 Add Aravaipa Canyon Wilderness Management Plan as one of the guiding management planning documents common to all alternatives.

172-9 Pg. 15 It would be helpful to provide a list of existing interagency agreements that are in effect. For example, do they include coop Habitat Management Plans with Arizona Game and Fish such as the Dripping Springs HMP at Aravaipa?

172-10 Pg. 17 With regard to ACEC management plans, have schedules and staffing assignments bee" made to assure that planning for these important areas will proceed in a timely manner?

172-11 Pg. 18, 2nd paragraph It would be helpful if you would define "good or better" ecological condition. The Conservancy has some expertise in evaluating riparian habitat and we would be pleased to provide input into riparian habitat analysis guidelines.

172-12 With regard to soil erosion, accurate baseline data and live monitoring are needed to evaluate whether watershed conditions are being "maintained or enhanced." Is such erosion monitoring program being planned?

172-13 Pg. 23-24 You propose preparing a District Transportation Plan that will identify road access and closure needs, so it appears somewhat inconsistent to identify numerous roads to open and close before the transportation plan is prepared. These actions should be postponed until after the transportation plan is prepared, with appropriate public input.

172-14 Pg. 27 Wilderness designation does not necessarily accomplish the same goals as ACEC designation. For example, in the Dry Spring and Swamp Springs-Hot Springs ACEC grazing is excluded to protect riparian habitat, but grazing is not excluded from wilderness areas. Management prescriptions designed to protect sensitive resources in ACECs must not be lost if management designation is changed to wilderness.

Issue 3. All riparian areas with perennial stream flow should be closed to Off-highway vehicles.

172-15 Pg. 29 Add as a" action for riparian areas the preparation of a" interpretive/educational program such as you have proposed for Cultural Resources

172-16 Pg. 33 Item 7. Add Aravaipa Canyon Watershed ACEC as a right-of-way exclusion area.

172-17 Pg. 33 "hat are the boundaries of the Aravaipa SRMA, dc they correspond tc the wilderness area? Turkey Creek should be included within the Aravaipa SRMA due tc the rapidly increasing recreational use cf the area.

172-18 Pg. 34 "0.4 The Watson Wash Hot Well site includes a population cf endangered Gila Topminnow, so any proposed recreational development of the site should take into consideration protection of this rare fish.

Pg. 35-36 Add Aravaipa and Swamp Springs-Hot Springs ACECs to areas withdraw" from mineral entry, mineral sales and surface occupancy.

172-20 Pg. 40 Recent taxonomic revisions have resulted in the following name changes: Aster lemonii is "cw _ _____Vauquelinia pauciflora is now V. californica var. pauciflora. Also Erigeron piscaticus and Lilaeopsis shaffneriana var. recurva should be added tc the list of priority T&E plant species. Rumex orthoneurus is found at higher elevations and is almost certainly not found on the district.

Pg. 41-42 We congratulate you on being a leader in Arizona in managing water resources with your Instream Flow permit at Aravaipa and Unique Waters application at Bonita Creek.

172-21 Pg. 131 Recent analysis of the mineral potential of the Table Mountain area indicates that the estimated commercial value there is $0.5 million, not $22.2 million as stated in Table 3-l (U.S. Bureau of Mines. 1988. Mineral Resources Of the Aravaipa Study Area. Graham and Pinal Counties, Arizona. Mineral Land Assessment, Open File Report 38-88).

172-22 Pg. invert&rates should be added to the list of Threatened and Endangered wildlife: the Bylas Spring snail (Apachecoccus arizonae) and the Gila Tryonia snail (Tryonia gilae). They are each known from one location on the district, Pg.151. We support a" active prescribed burn program to manage grassland habitat.

Pg. 160 I" the long run, riparian vegetation receives high, "ct moderate, benefits from establishment of Instream Flow rights.

172-23 Pg. 183, item pg. 184 item 29. The Muleshoe pipeline road was created for construction purposes only and should "ct be opened for public use. It runs close to Bass Springs Creeks on steep, erosion-prone hillsides. Regular use of this road would lead and siltation problems in these sensitive streams.

172-24 Pg. 190, 194 Chemical treatment should not be considered as a method for vegetation management in the Turkey Creek or Hct Springs watersheds due tc risks tc water quality and fish populations.

172-25 Pg. 201 The list of Threatened and Endangered plants should include Erigeron piscaticus and Lilaeopsis shaffneriana ssp. recurva, both of which are candidates for listing by the Fish and Wildlife Service.

172-261 Pg. 217 The suggestion that wilderness designation may adversely effect wildlife is inappropriate and biased: nowhere else in the RMP do you suggest that management activities, such as opening roads for example, may have adverse effects on wildlife.

172-27 Pg. 238 Wild and Scenic River designation can be given by either the Secretary cf Interior or Secretary of Agriculture, without Congressional approval, under Sec. 2aii of the W and S.R. Act.

Pg. 247 The management objectives for Riparian/Aquatic habitat are good, although somewhat vague. Could you provide a definition, or guidelines, for evaluating "good" ecological condition in riparian habitat. Management objectives for riparian/aquatic habitat should address control cf exotic fish, which are one of the major threats to native fish species.

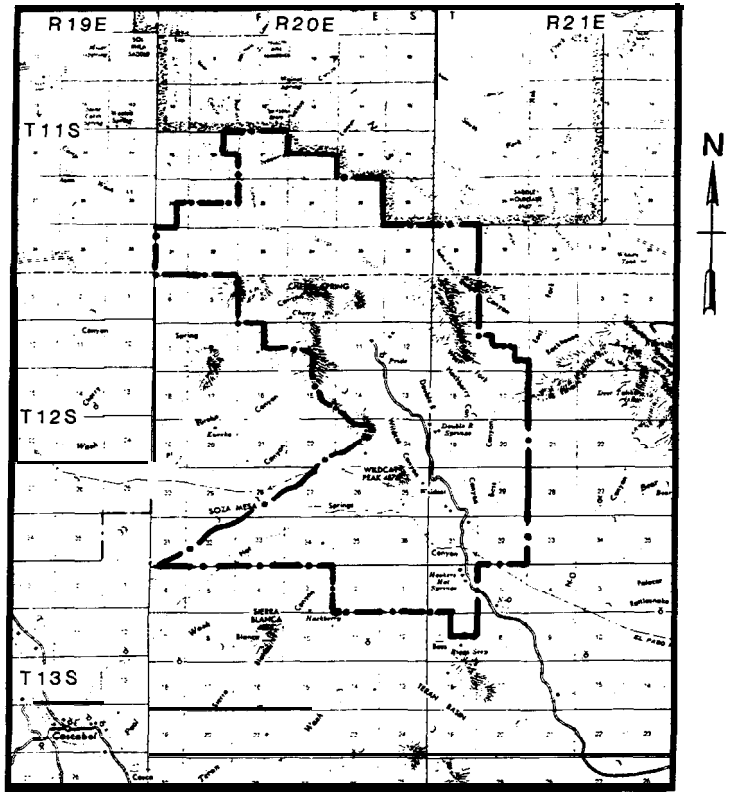
Thank you for considering our comments c" the draft RMP, which are a compilation cf input from several on our staff. If we can be of further help, please feel free tc contact me.

Sincerely,

Peter L. Warren

Peter L. Warren
Public Lands Protection Planner

MULESHOE RANCH ACEC



ALTERNATIVE - - - I -

0 1 2 3
SCALE IN MILES

104

Basemap © Az. Dept. of Trans.

173

THE WILDLIFE SOCIETY, AWONA CHAPTER
P.O. Box 11135
Phoenix, AZ 85017

June 12, 1990

Mr. *Ray A. Brady*
District Manager
Bureau of Land Management
Safford District
425 E. 4th street
afford, Arizona 85546

Dear Mr. Brady:

Re: Review of Safford Resource Management Plan (RMP) and Environmental Impact Statement

The Arizona Chapter of the Wildlife Society has reviewed the above-referenced RMP, and we would like to submit the following comments.

First, we want to commend the Bureau of Land Management (BLM) and the RMP team members for their efforts in the preparation of this comprehensive document. We realize that the integration of the various uses of public land in the Safford District requires trade-offs between a multitude of resource values. With this in mind, it is our intention to provide comments and concerns that are meant *to* enhance. rather than detract from this document.

Although we generally support most of the management direction proposed in Alternative A (the Preferred Alternative), we believe that the best possible approach would be a combination of management directions from the Preferred Alternative and alternative B.

To help organize our comments, we wil 1 be responding to the specific issues and management concerns listed in the Draft RMP.

<u>Issue 1 - Access</u>

We support the Preferred Alternative

380-F

Issue 2 - ACEC 's

We strongly support the designation of the 17 Areas of Critical Environmental Concern (ACEC's) identified in the Draft. The special protection afforded by the ACEC designation will benefit the wildlife resource in these areas.

We support Alternative B for the following ACEC's:

Bonita Creek
Turkey Creek Riparian
Desert Grasslands Research Natural Area
Dry Spring Research Natural Area

For all other ACEC's, we support the Preferred Alternative

We support the Wild and Scenic River designations recommended in Alternative B for the Gila River segments identified on pages 47 and 48. Many of Arizona's river systems have been adversely impacted by human activities, and we believe that the greatest protection should be given to those portions of our rivers which remain relatively undisturbed. As outlined in Appendix 5, the additional protection provided by inclusion in the National Wild and Scenic River System should not place unreasonable restrictions onmining, livestock grazing, of recreation. The designation would protect the river from water supply dame, major diversions, hydroelectric power facilities, and flood control works.

Issue 3 - Off-Highway Vehicles

We support the designated closures in Alternative B and strongly oppose Alternative C on this issue. Designating most of the acreage in the district as "Open" to OHV use (Alternative C) puts many unique wildlife habitats and the species that depend on these habitats et risk.

Issue 4 - Riparian Areas

We believe that the overall goal foe riparian areas on the Safford District should be to improve end then maintain 100 percent of the vegetation in good or excellent condition. However, the RMP's stated objective of maintaining end improving 75 percent of the acres of riparian vegetation in good or &cell&t condition by 1997 is reasonable.

Management Concern 1 - Wildlife Habitat

In general, we concur with the wildlife habitat management objectives contained in the Draft RMP; however, the information provided in Appendix 6 does not accurately reflect the current

Arizona Game and Fish Department
objectives.

173-1 The current strategic plans cal
of the habitat on BLM lands to
References to increasing populat
from an earlier plan. We recomme
Fish Department for clarificatio

Management Concern 2 - Lands an

We recognize tiie benefits of co
and we support the objectives and
Alternative.

Much of the riparian vegetation a
River, from the northern bou
National conservation Area to the
Pedro Rivers, has been impac
agriculture and other human a
remaining riparian habitat is l
jeopardy of being lost.

173-2 We recommend that the BLM iden
lands on the lower San Ped
significant riparian wildlife h
acquisition of these parcels thro
to protect the high quality wil
corridor.

Other Management Concerns

For the additional eight manag
plan. we support the Preferred

It is our hope that these comme
changes which we feel will enhanc
be incorporated while still mee
use management.

We would like to thank you for t
preparation of this plan and
involved in the process.

S

for R
P

174

THE STATE OF ARIZONA

GAME & FISH DEPARTMENT

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Deputy Director
Thomas W. Spalding

June 11, 1990

Mr. Ray A. Brady
District Manager
Bureau of Land Management
Safford District Office
425 E. 4th street
Safford, AZ 85546

Dear Mr. Brady:

Re: Draft Safford District Resource Management Plan and Environmental Impact Statement (RMP/EIS)

The Arizona Game and Fish Department has reviewed the above-referenced Draft, and the following comments are provided.

It is obvious that a major effort went into the development of this draft _plan. The Bureau of Land Management (BLM) should be commended for their thoroughness in identifying issues, concerns, and opportunities and in developing alternatives which adequately address the various issues. I" particular, the Areas of Critical Environmental Concern (ACEC) evaluations indicate a responsiveness to public Input and a professional analysis of the resources.

Our Department's comments on specific issues and/or concerns are included in an attachment to this letter. Although we generally support the management direction outlined in Alternative A (BLM's Preferred Alternative), we have concerns with specific management recommendations contained in this Alternative (see attachment). We believe that a combination of management direction from the Preferred Alternative and Alternative B should be considered as the best approach in the Final RMP/EIS.

We appreciate the opportunity to provide comments on the Draft Safford District RMP/EIS. we look forward to continued cooperation with the BLM in the development and implementation of the final plan.

Sincerely,

Thomas W. Spalding
Deputy Director

TWS:DLW:lkl

Attachment

An Equal Opportunity Agency

Attachment.

SPECIFIC COMMENTS ON ISSUES AND MANAGEMENT CONCERNS

Issue 1 - Access

174 - This issue was identified by our Department early in the planning process. Because of the Significant number and types of access problems occurring, especially in southeastern Arizona, we recommended that the RMP/EIS provide the framework for the solution of as many problems as possible. Throughout the review process, we have asked all of our Wildlife Managers to pay particular attention to the list of locations being considered for the acquisition of legal access (Appendix 1 in the Draft). The list appears to be very comprehensive and should go a long way toward-addressing and resolving many of the access issues that we have identified on public lands in the Safford District. We are aware of only one additional public land access issue that was not identified in the Draft. This issue involves a locked gate located where a road crosses a small parcel of private land in Township 16 South, Range 31 East, Section 17, NENW. The effect of this locked gate is to deny access to a large area of BLM and Forest Service lands in the vicinity of Portal. We are aware that the BLM is currently involved in efforts to resolve this problem, and it may be that resolution is achieved before the RMP becomes final. Nevertheless, we recommend that this site be added to the list of access roads found on page 24 of the Draft.

174-2

380-H

Bonita Creek ACEC. The important resource values associated with Bonita Creek are derived, by and large, from the quantity and quality of water present in the perennial stream channel. These characteristics, and the importance of the stream as the source of domestic water for the City of Safford are well described in the Plan. Numerous studies have demonstrated the relationship between water quality and the condition of the watershed in which a stream is located. Therefore, we believe that the management prescriptions identified in the Preferred Alternative will only be truly effective if they are applied across the Bonita Creek watershed, as proposed in Alternative B. The application of protective features throughout the watershed recognizes that the uplands and the streambed function as an interconnected system.

It appears likely, at this point in time, that Bonita Creek will become part of the Gila Box Riparian National Conservation Area through congressional action. Notwithstanding any such action, we support the designation of the entire Bonita Creek watershed as an ACEC, as proposed in Alternative B.

Gila Box Outstanding Natural Area ACEC. We support the Preferred Alternative. This issue may be moot, however, as the entire area appears likely to be designated as the Gila Box Riparian National Conservation Area.

Turkey Creek Riparian ACEC. This area was nominated, in large part, because of the important riparian resources associated with Turkey, Oak Grove, and-Maple Canyons. Recognizing the profound influence that watershed quality has on riparian resources and in keeping with the reasoning outlined above, we support the ACEC boundaries and management prescriptions identified in Alternative B. The inclusion of the Aravaipa Canyon watershed within the ACRC should provide for a more unified approach to the management of the resources associated with Turkey Creek and Aravaipa Creek.

We are aware that the suspension of grazing on the South Rim Allotment proposed under Alternative B has become an issue of some controversy. Our Department is satisfied that The Nature Conservancy (the grazing permittee) has consistently demonstrated both the willingness and the wherewithal1 for responsible natural resource management in Arizona. We believe that the Conservancy should be provided the opportunity to continue their tradition of sound stewardship on the South Rim Allotment, regardless of whether or not this stewardship includes livestock grazing.

Table Mountain Research Natural Area ACEC. We support the Preferred Alternative.

Desert Grasslands Research Natural Area ACBC (Pilares Sombrero Butte and Mescal Ridge). These relict grassland areas provide unique wildlife habitat, critical to a number of State-listed wildlife species. We agree that this area should be designated as a" ACEC, but we prefer the additional protection furnished under Alternative B, including closing the area to OHV use,

closing the area to mineral material sales, and prohibiting surface occupancy for mineral leasing. (Tables 2-l and 2-S do not agree completely with the ACEC Evaluation given in Appendix 2. as relate; to the differences between the-Preferred-Alternative and Alternative B for this ACEC with regard to OHV activity.) We support Alternative B on the Desert Grasslands Research Natural Area (RNA) ACEC.

174-3 Dry Spring Research Natural Area ACEC. As best as we can determine from Map 11 on page 102, we do not believe that Mescal Warm Springs Section 20, SW1/4) is included in this ACEC. We believe that this spring area should be included in the ACEC. The springs and the Gila Topminnow at this location are important resources that should be protected.

We prefer that the additional protection granted in Alternative B for the Dry Springs ACEC, include:

-- ACEC status and special management would be retained, even if Congress designates Needles Eye Wilderness

-- additional restrictions would be placed on mineral activities (mining would be withdrawn and no sand/gravel sales would be permitted)

-- the area would be closed to OHV "se

-- overnight camping would not be allowed

174-4 Agai, Tables 2-l and 2-S do not entirely agree with the ACEC EEvalation given in Appendix 2, as relates to the differences between the Preferred Alternative and Alternative B for this ACEC This problem may occur for other ACEC's.

Woodcutting, which we feel is' inappropriate for this area, is prohibited under the Preferred Alternative, but not mentioned in Alternative B. We support Alternative B, with the addition of a restriction on any woodcutting for the Dry Springs RNA ACEC.

Swamp Springs-Hot Springs Watershed ACEC. In general, we support the management prescription described in the Preferred Alternative. The riparian plant community and the important native fish populations in the area should benefit from the proposed special management. However, we question the rationale for excluding a portion of Section 32, T12S, R21E, in the Preferred Alternative. Bass Canyon provides important native fish habitat and supports riparian vegetation. It would appear logical to include all of Section 32 within the boundary of the ACEC in order to provide management for the lower Bass Canyon watershed and its associated aquatic community. Therefore, we recommend that the final proposal include all of sections 29 and 32 within the ACEC boundary.

We are pleased to see that the Preferred Alternative provides for the acquisition of legal public access on the Jackson Cabin Road. Our Department has consistently supported the maintenance of access on this road up to the National Forest boundary.

Bear Springs Badlands ACEC. We support the Preferred Alternative.

Guadalupe Canyon Outstanding Natural Area ACEC. We support the Preferred Alternative.

Bowie Mountain Scenic ACBC. We support the Preferred Alternative.

Coronado Mountain Research Natural Area ACEC. We support the Preferred Alternative.

Peaks ACEC. We support the Preferred Alternative.

Eagle Creek Bat Cave ACEC. We strongly support the Preferred Alternative, especially the acquisition of private lands at the mouth of the cave. Past acts of vandalism (shooting into the cave) and unauthorized uses, such as guano mining, hare seriously impacted this important maternity colony.

The acquisition of the desired private lands may be a difficult and long-term process. Therefore, we recommend the following additional management action for inclusion in the management prescription: Negotiate for a conservation easement and/or cooperative management agreement with the private land owner in order to control access into the cave and to protect the cave resources.

Willcox Playa National Natural Landmark ACEC. We support the Preferred Alternative.

111 Ranch Research Natural Area ACEC. We support the Preferred Alternative.

Peloncillo Mountains Outstanding Natural Area ACEC. Much of the proposed ACEC lies within the proposed Peloncillo Wilderness Area and many of the management activities would be accomplished under wilderness management. We support the Preferred Alternative.

Wild and Scenic River Designations. It is difficult to determine the relationship between the alternatives contained in Appendix 5 and the recommendations for Wild and Scenic River designation found in the various alternatives. We believe that a "Wild" classification would result in a greater potential for the long-term protection of the resources associated with the candidate rivers through the restriction of OHV use. Therefore, we support the Wild and Scenic River recommendations contained in Alternative B. The impacts and additional protection provided by inclusion in the National Wild and Scenic River System (NWSRS)

are well outlined in Appendix 5, page 242, item 6. Arizona's river systems have been heavily impacted by human activities, and we believe that all protection should be given to those remaining, relatively undisturbed, rivers. This portion of the Gila River provides habitat and water sources for numerous game and nongame species in the area, including white-tailed deer, mule deer, javelina, bald eagles, and even an occasional bighorn sheep. We believe that the additional restrictions granted by Alternative B (providing Congress acts on the BLM recommendation and designates the Gila for inclusion in the NWSRS) would not place unreasonable limitations on mining, livestock grazing, or recreation. The designation would protect the river from water supply dams, major diversions, hydroelectric power facilities, and flood control works.

Issue 3 - Off-highway Vehicles.

We concur with recommendations contained in the Preferred Alternative. We believe that the proposed closures should serve to protect sensitive wildlife resources that are currently being impacted by vehicle use. We do, however, ask that the Desert Grasslands RNA ACEC and the Dry Springs RNA ACEC be designated as "Closed" to OHV use, as proposed in Alternative S. Both of these areas contain unique wildlife habitat that needs protection from OHV use.

As an additional comment, we strongly oppose Alternative C on the OHV issue. Alternative C would designate most acreage in the District (1,311,747 acres) as "Open" to OHV use, where all types of vehicle use is permitted at all times and anywhere in the area. This designation is not compatible with protection of wildlife habitat resources.

Issue 4 - Riparian Areas.

We support the 1997 objective of maintaining or improving 75 percent of the acres of riparian vegetation in the District in good or excellent condition by 1997. We believe that the goal for riparian condition should be 100 percent in good or excellent condition, but agree that 75 percent is a reasonable short-term objective. We trust that the objective will not become a target for success, but simply serve as a guide toward achieving a greater goal.

The management strategies described in the Draft, combined with the more detailed riparian habitat objectives of the Wildlife Program (Appendix 6), should provide the necessary guidance for achieving the 1997 objective.

Management Concern 1 - Wildlife Habitat.

In general, we agree with the wildlife habitat management objectives indentified in the Draft, and we support the actions proposed to accomplish these objectives. In particular, we agree

380-J

174-6 that existing Habitat Management Plans are in need of revision, both in terms of their boundaries and in terms of their planned actions. We are concerned that planned actions 11 and 12 on page 31 are not complete. Livestock allotment management planning potentially impacts wildlife and wildlife habitats in all areas. The provision of adequate forage, cover, and water for wildlife should be an integral part of every allotment management plan, without reference to habitat type.

Appendix 6 (Management Objectives for Priority Species/Habitats) contains some inaccuracies relative to Department Strategic Plan goals and objectives. Apparently, the management goals for big game were taken from an out-dated strategic plan, rather than the one currently in effect. The following changes will be necessary for the final plan:

Bighorn Sheep: The Department objective for BLM lands is to increase the capability of the habitat by 10 percent on BLM lands by 1990. In addition, this section defines "viable" as 125 bighorn. We should point out that this figure was an estimated minimum necessary to sustain a population over time and should not be considered a "target'. We recommend deleting the figure of 125 sheep.

174-7 Mule Deer: The Department Strategic Plan objective is to increase the capability of the habitat by 7 percent on BLM lands by 1990.

Pronghorn Antelope: Strategic Plan objectives call for a 15 percent increase in pronghorn habitat capability on BLM lands by 1990.

Oak-Woodland Species: Department Strategic Plan objectives are for no change in white-tailed deer, turkey, and black bear populations on BLM lands.

Management Concern 2 - Lands

I" general, we recognize the benefits associated with the consolidation of public land ownership in terms of improving management efficiency. Therefore, we support the objectives and proposed actions contained in the Preferred Alternative. Our support is predicated on the assumption that we will continue to be participants in the evaluations of individual land actions as they occur, and that these lands will be traded for other lands of equal or preferably higher resource values.

174-8 We would also like to suggest that the following be included in the actions involving land acquisition in the Safford District. The lower San Pedro River, from the northern boundary of the San Pedro Riparian National Conservation Area to the confluence of the Gila and San Pedro Rivers, supports an often excellent Riparian plant community along much of its length. Both cottonwood-willow plant associations and remnant mesquite bosques

are located along this stretch
vegetation associated with t
impacted in the past by clear
activity. Nearly all of the
located on private land and
jeopardy of being lost.

Our Department strongly encourage
private and State Trust lanc
corridor that possess signifi
potential for acquisition throu
to protect the important wild
corridor. The BLM may soon b
property adjacent to the San
an excellent nucleus around w
and wetland habitats.

174-9 In addition, we are concerned
Little RS Spring, Yellowjacket
springs (specifically BLM lan
R15E, Sections 11 and 12: T3S
area has high wildlife value,
sections included in the Hay
Area. We realize that some a
acquired to make these parcels

Other Managment Concerns.

The additional eight management
are only marginally involved w
cases where wildlife may be a
potential conflicts. We do r
between the various alternative
the Preferred Alternative in ea

175

Linda K. Wells
P.O. Box 47116
Phoenix, Az. 85068

BLM Safford District
Steve Knox, Team Leader
425 E. 4th Street
Safford, Az. 85546

Dear Steve:

I am writing in response to the Safford District Resource Management Plan Draft EIS.

I support road closures into large and sensitive areas. There are 69 T&E and special status wildlife species and 9 T&E plant species in the safford district and the less roads and disturbance the better chances for recovery. I am also against building any more roads for the same reason. You say roads will enhance recreation but wild areas are so degraded by roads that we are killing off what we are going out there to see. Lets leave the pavement to the cities and get out and hike instead.

Off highway vehicles are also very disturbing to wildlife and vegetation. There are too many acres designated for use by OHVS. They are not compatible with the desert environment and they degrade the areas for wildlife and other users. It is also too difficult to keep them off the road in limited areas. Too many of them abuse the land and vegetation. They not only have access to too large an area to allow them to have total access to 1708 acres is incompatible with your concerns for wildlife habitat. OHVS destroy vegetation, destroy burrows and crush animals, rupture ear drums of burrowing animals and compact soils thereby initiating run off. I adamately appose any OHVS on our public lands. The rights of the wildlife to survive without that kind of harrassment far outweighs the rights of the people who don't want to leave their machines in the city.

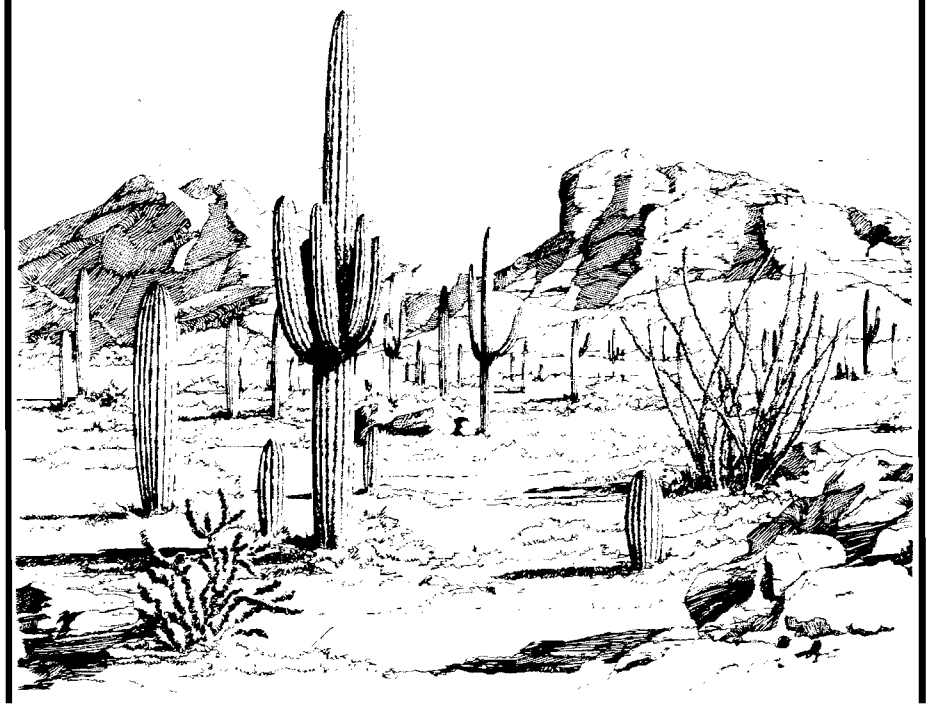
I would also like to see all of the safford district closed to ADC. Their goals are counter to the goals of a healthy wildlife habitat. I am also against killing rabbits and rodents to improve vegetation cover. The solution to their overpopulation is to stop killing preditors for livestock interests. They pay a reduced fee because they share forage and will loose cattle to wildlife. If livestock production is not economically feasible within a healthy wildlife habitat then it should not continue.

I do commend you closing areas to livestock and encourage you to continue to reduce cattle numbers.

Sincerely,

Linda K. Wells

Linda K. Wells



The results of public comments have been separated into two sections: BLM's general response to public comments and public comment letters and BLM's specific responses.

General Response 1. Assumptions

BLM assumed that full funding and personnel would be available to implement any alternative. This is a basis for comparing reasonable alternatives and analyzing impacts. It is also an important element in selecting the final plan and defining implementation priorities and monitoring needs.

General Response 2. Livestock Grazing

All the requirements of National Environmental Policy Act have been met with respect to the grazing program. As stated in the draft, the livestock grazing issue was studied in the Upper Gila-San Simon (1978) and Eastern Arizona (1986) Grazing Environmental Impact Statements as well as the San Pedro River Riparian Management Plan and Environmental Impact Statement (1988). Livestock grazing decisions in those documents have been or are being implemented through individual grazing decisions according to schedules developed after completion of the Environmental Impact Statement. Monitoring studies, required to determine the effectiveness of those decisions, are taking place. A Range Program Summary Update is prepared periodically to display the results of the studies. If monitoring reveals that stocking levels are too high and the utilization of forage is too great, then the operator is required to reduce the stocking level. If, on the the other hand, increases in stocking levels are requested and, if monitoring reveals that the increases could be accommodated, they could be permitted.

When an operator requests an increased stocking level in an allotment not being monitored, studies will be set in place and at the end of the monitoring cycle the decision to grant or deny the increase can be made.

Grazing by livestock is a use of the public lands historically permitted by Congress. BLM does not feel it is necessary or in the public interest to arbitrarily cease livestock grazing on all public lands. Better management, especially in sensitive areas such as riparian, may be necessary. That is one of the purposes of this document, to identify those sensitive areas and describe the kinds of protection we feel are necessary. The specific plans for protection will emerge from activity plans designed to fit the special management prescription.

General Response 3. Alternative Selection

Each alternative is a complete plan developed around a theme or level of management direction. Each has, as integral parts, various actions or levels of actions that appear to best meet the thrust of that theme. When the decisions are made as to what the plan will contain, parts of any of the alternatives may be included. The alternatives are not designed to require adoption of all of their components.

General Response 4. Animal Damage Control Activities.

Except for a few identified areas such as Aravaipa Canyon Wilderness Area and San Pedro Riparian National Conservation Area, public lands within the District are open for Animal Damage Control activities. BLM must approve requests before these actions can occur, but unless there are overriding reasons, approval will usually be given. It should be noted that requests for predator control can be based on wildlife needs or human safety (disease outbreaks) as well as livestock losses.

General Response 5. Mineral Withdrawals.

The authority to close lands to mineral entry has not been delegated to the District Office. Recommendations for such withdrawals are reviewed and evaluated by the Director, BLM and The Department of the Interior to determine the rationale and need for these recommendations. Withdrawals can only be made through a Public Land Order or congressional action.

The recommendation must include a detailed mineral report outlining the mineral potential of the subject area. It must also describe why existing laws, regulations and management practices will not adequately protect the non-mineral resources from exploration and mining activity. Economic significance resulting from the loss of mining income if the area is withdrawn from the mining laws must be described so that comparisons can be made with the values retained or enhanced as a result of the withdrawal.

General Response 6. Compliance-with-the National Environmental Policy Act of 1969

Prior to approving any activity plan-level site-specific project BLM will complete the necessary environmental compliance process. In some cases this will entail a Categorical Exclusion Review (40 CFR 1508). If a proposed action, with mitigation, would have significant adverse environmental consequences, the project will be abandoned, revised as necessary to avoid significant adverse impacts, or an environmental impact

statement will be prepared. Environmental compliance procedures are documented and are available for public review. Many involve public participation and comments in their preparation. All decisions based on environmental documentation are available for public review.

Public Letter Responses

Response I-I

The action referenced is found in Alternatives A and C. The proposed woodcutting is designed to help control mesquite and other desert shrubs that have invaded former desert grasslands by helping to control the extent of the invasion and by improving the vegetation diversity. In the long-term, wildlife should benefit by the action. These sites were selected because of the stable soil types.

Response 2-1

See General Response 3. This action is viewed as being within a resource protection/conservation theme. This theme is represented by Resource Management Plan Alternative B; hence, the proposal to nominate cultural properties to the National Register of Historic Places is included in that alternative.

BLM can nominate eligible cultural properties to the National Register of Historic Places under any of the Resource Management Plan alternatives. The authority to do so is given in the National Historic Preservation Act of 1966, as amended.

Response 4-1

See General Response 5. The mineral potential of the area will be reviewed and evaluated prior to any recommendation to the Bureau Director or Department of the Interior for a withdrawal. If the withdrawal is authorized, then any valid mining claim would be subject to valid existing rights.

Response 5-I

Because the recovery plans for aplomado falcons and woundfin were site-specific for the Safford District, we are able to make specific management decisions for only these species in the Resource Management Plan. On a practical basis the species with a recovery plan specific to the Safford District are more likely to be reintroduced than those without, during the life of of the Resource Management Plan. Should an existing recovery plan be modified so that a release on public lands is proposed, the Endangered Species Act would trigger an evaluation despite the lower priority for reintroduction at this time.

The Mexican wolf was listed as an endangered species in 1976, and a recovery plan was completed by the Fish and Wildlife Service in 1982. The plan identified several factors for potential release areas including "middle to high elevations of a 5,000 square mile area"; "adequate amounts of free water"; "broken, sloping country, abundant prey, especially white-tail deer, suitable plant communities and minimal conflicts with livestock."

The Safford District does not have a suitably sized block of land. The total acreage managed by the District is only half the required size. Most of the District's public lands are below the elevation suggested (4,500 feet) and livestock grazing is ongoing. There is abundant water and probably sufficient prey in some blocks of land.

Actions that BLM has taken that would benefit a wolf reintroduction, should it be proposed, include State/BLM land exchanges in the Muleshoe, Aravaipa, Santa Teresa , Gila and Peloncillo mountain areas, Areas of Critical Environmental Concern proposals, big game and livestock waters developed as part of previous Habitat Management Plans and Allotment Management Plans. In addition, proposals to limit vehicles to existing roads and trails, prescribed burnings, reintroduction of bighorn sheep and antelope, and riparian enhancement efforts would benefit the wolf.

Response 6-1

Regulations assure that the United States retains a continuing right of access onto the public lands covered by a right-of-way grant or temporary use permit. Public lands covered with a grazing permit are open for public access. However, BLM cannot force a grazing permittee to provide an easement over his private land.

Response 9-1

Class I Visual Resource Management designations are generally reserved for congressionally designated areas such as wilderness or for Areas of Critical Environmental Concern which are solely based on scenic values. Although Brandenburg Mountain falls in Class a III category according to physiographic province, your letter evidences a high-sensitivity level. The Resource Management Plan/Final Environmental Impact Statement reflects a change to Class II.

Response 1 O-1

BLM's policy is to develop Allotment Management Plans through cooperation with the allottee and an interdisciplinary approach involving other affected resource interests. This gives the allottee opportunities to interact with Arizona Game and Fish personnel on problems involving hunters and hunting seasons.

Response IO-2

The Arizona Game and Fish Department is responsible for determining the hunting seasons. BLM only coordinates with the Arizona Game and Fish on seasons.

Response 11-l

The 1989 Mohave Final Wilderness Environmental Impact Statement analyzed each specific Wilderness Study Area and provided recommendations based on wilderness values. An opportunity for public comment to these recommendations was presented at that time. See page 17 in Resource Management Plan/Draft Environmental Impact Statement for clarification.

Response 11-2

BLM analyzed the environmental effects of livestock grazing in two previous Environmental Impact Statements. Mining is a legitimate use of the public lands authorized by law, although BLM can require mitigating measures and enforce current laws and regulations. Alternative A restricts off-highway vehicles to existing roads and trails over much of the District (1,310,713 acres) and closed to off-highway vehicless on 87,879 acres. Only 1,708 acres would be left open to unrestricted use. (See General Responses 2 and 6).

Response 1 1-3

The goal to achieve 75 percent of the riparian vegetation in good or excellent condition is based on data indicating it is achievable. Some areas cannot respond enough to reach good or excellent condition by 1997. For example, the north end of the San Pedro Riparian National Conservation Area, even with livestock removed, will not reach good or excellent condition in the predictable future. The problem is the encroachment of salt cedars and the erosion present in the stream channel. Unrestricted and unmanaged livestock use is not the sole reason for poor conditions of riparian areas. Proper management of livestock in those areas can speed riparian area improvement, however.

Response 12-1

See Response 5-l.

Response 14-1

The actions from implementing each alternative would be reviewed for compatibility with adjacent land uses and consistency with state, federal and focal plans.

Existing cooperative agreements would be continued, and processes for developing new cooperative efforts will be pursued.

Response 14-2

The resolution of legal boundary questions is beyond the scope of this Resource Management Plan. BLM will continue to work cooperatively with other agencies to assure that the present condition of the lands in question is maintained or enhanced until the legal questions regarding boundaries are resolved.

Response 143

The Bonita Creek area would benefit by the revision of the existing Cooperative Management Agreement with the City of Safford to include the San Carlos Apache Tribe in the management of the Bonita Creek Watershed. This is not specifically addressed in the Resource Management Plan because it is an activity-level action. (See General Response 6).

Response 14-4

BLM advised the Tribe by mail, Federal Register Notice of Intent, newsletters and newspaper public service announcements of scoping meetings to be held. Summaries of the scoping meetings were submitted to the Tribe for information and comment. Invitations to the public meetings were sent to the Tribal Council and the Bureau of Indian Affairs. BLM also attended Tribal Council meetings whenever requested.

Response 14-5

The cultural needs of the San Carlos Apache Tribe are a consideration in all the Resource Management Plan alternatives. Afternatives A, B and C propose ethnographic studies in the Bonita Creek and Aravaipa Canyon areas. Alternative D proposes action to "conduct studies to identify socio-cultural values." Such a study would also be ethnographic.

To date, the Safford District's attempts to involve the San Carlos Apache Indian Tribe in the identification and protection of important Apache historical, religious or ceremonial sites have taken place during a public meeting in San Carlos, and through formal notification of the development of the Resource Management Plan and requests for comments or input.

Response 14-6

The need for environmental education plans was discussed on page 37 of the Draft Environmental Impact Statement. Specific environmental education plans are not, however, appropriate for an Resource Management Plan. Environmental education is an ongoing program in the Safford District. BLM personnel present special programs to schools, usually in conjunction with programs such as Archaeology Week or Wildlife Week.

Response 14-7

No special effort was made beyond those mentioned above (14-4) and in Chapter 5, to discover ongoing planning efforts of the San Carlos Apache Tribe. BLM welcomes the opportunity and invitation to work with the Tribe as it develops a new Resource Management Plan.

Response 15-1

BLM intends to improve riparian areas and, if possible, allow other legitimate uses of the public land to occur. See Issue 4, page 17 of the Resource Management Plan/Draft Environmental Impact Statement. Current plans are for livestock grazing to be removed from some riparian areas and for grazing to be managed in other areas to enhance riparian areas. See General Response 2.

Response 20-I

Mountain bicycles are no longer listed with off-highway vehicles.

Response 21-I

See Response 20-I.

Response 47-1

The subject map in the Resource Management Plan/ Draft Environmental Impact Statement will not be republished. All new maps printed by BLM will reflect the modification of the boundary across the Coronado National Forest.

Response 47-2

BLM hopes to continue negotiations with the San Carlos Apache Tribe to acquire access primarily for recreational purposes to the Needles Eye area by Ranch Creek Road.

Response 47-3

BLM data indicate that bighorn sheep are more susceptible to disease from domestic sheep than from cattle. Conflicts between bighorn sheep and cattle can arise through competition for food and water. However, with proper livestock management this has not been the case with the Aravaipa bighorn herd, as documented in a major study by Arizona Game and Fish Department.

Response 51-1

This Proposed Resource Management Plan contains a revised boundary configuration for the Guadalupe Canyon Area of Critical Environmental Concern. See Map 13.

Response 51-2

BLM policy is to manage livestock to minimize impacts on riparian zones. When the management plan is written for the Guadalupe Canyon Area of Critical Environmental Concern, wording similar to yours will be included in the activity plan. (See General Response 6.)

Response 52-1

The intent of the statement was to point out that vegetation would be enhanced in riparian areas. Wildlife, using only a portion of the vegetation would not benefit as much. In addition, priority wildlife species that did not require riparian vegetation would not benefit.

Response 61-I

See Response 1 I-I.

Response 63-1

The riparian areas are depicted by a solid line. In riparian area 37, the line follows the San Simon River and several short side-channels. The line encompassing the larger area simply helps identify particular riparian areas listed in the legend. We regret the confusion created by the use of these area lines. Riparian areas near a mining area do not necessarily place major constraints on mining operations. Mining

plans or mining notices will be required and are subject to National Environmental Policy Act compliance. (See General Response 6.)

Response 64-1

Closing sheep lambing areas reduces stress during a critical time in the sheep's life cycle. Once lambing is completed and those areas are no longer needed for that purpose, these existing roads and trails can be reasonably be opened to vehicle use since sheep range quite far during the remaining part of the year.

Allowing the public to drive on existing 4x4 roads the rest of the year will not adversely impact bighorn sheep. Off-highway vehicle use is generally light in these areas.

Closure of the District to vehicle use would not resolve the difficulties in assuring compliance with the closure.

Response 66-1

A Special Recreational Management Area plan will be developed following the approval of the Resource Management Plan. Environmental compliance documents will be completed as part of the recreation plan. (See General Response 6.)

Response 68-1

Visual Resource Management classes are assigned to establish management objectives that maintain the desired scenic quality of the public lands. Visual Resource Management classes are determined by considering scenic quality, sensitivity level and distance zones. Based on these three factors, lands are placed into one of four visual resource management classes. Although a Class IV designation represents land of least visual value, it does not allow for total destruction of the land. The management objective of a Visual Resource Management Class IV area is to allow modification of the landscape, but the changes must still reflect a natural occurrence. Regardless of class, approval for proposed surface-disturbing activities is subject to National Environmental Policy Act compliance. (See General Response 6.)

Response 74-l

See Response 11-l.

Response 76-1

An interpretive program addressing types of gates and interpretive signs is planned as part of the Area of Critical Environmental Concern management plan. Since the Eagle Creek Canyon is owned by Phelps Dodge, a firearms discharge ban is not an appropriate action for this Resource Management Plan. (Also, see General Response 6.)

Response 76-2

The need for a more effective gate will be evaluated as part of the management plan for the Eagle Creek bat cave. (See General Response 6.)

Response 83-1

See Response 5-1. The Arizona Game and Fish Department did not include BLM in the list of those sent copies of the letter and, when contacted for this information, indicated this was only an initial list from which to begin discussions among members of the Mexican wolf recovery team. It was not a list of sites being evaluated for releases.

Response 86-1

Although this is activity-level planning and is not addressed in the Resource Management Plan, the Area of Critical Environmental Concern management plan will include educational information as part of the interpretation of the Eagle Creek bat cave. The need for a better gate is being evaluated and construction will be initiated if necessary. Withdrawal from mining is part of the Area of Critical Environmental Concern prescription, but this does not preclude activities of those holding valid existing rights. Firearms restrictions cannot be initiated within the canyon by BLM, as canyon lands are privately owned. (See General Response 6 for additional information.)

Response 89-1

See Response 20-l.

Response 91-l

If mineral withdrawals are included in the approved Resource Management Plan, the necessary steps for withdrawal will be pursued. The mineral potential of the area will be reviewed and evaluated prior to any recommendations to the Bureau Director or Department of the Interior for a withdrawal. (See General Response 5)

Response 91-2

See Response 63-l.

Response 913

See Response 91-l.

Response 93-1

The need for a more effective gate is currently being evaluated. (See General Response 6.)

Response 96-1

See Response 20-l.

Response 97-1

BLM set out three traffic counters between 1981 and 1986. The counters were located at the end of the asphalt road, below the BLM Aravaipa parking lot and above the BLM parking lot. The data for the high-use periods, March through May and September through December shows a range of 5 to 14 vehicles per day. Of that number, 7 to 20 percent were there for use of the BLM recreational facilities. (See General Response 6.)

Response 97-2

See Response 97-l. Since a 50 person per day limit (30 from the west end) was placed on Aravaipa Canyon, visits have slowly increased but are expected to level off as capacity is reached.

Response 97-3

See Responses 156-6 and 172-6.

Response 97-4

See Response 97-3.

Response 98-1

Departmental policy states that every wildland fire is either a wildfire or a prescribed burn. All Safford District wildland fires are fully suppressed regardless of whether or not they occur within a wilderness area. Wilderness fires receive special suppression considerations to minimize any impacts.

Plans to develop prescribed fire criteria and goals are currently underway which will address both natural and planned ignitions. These plans will include wilderness and non-wilderness areas and will be incorporated later into the Safford District Fire Management Activity Plan. (See General Response 6.)

Response 98-2

BLM is currently a member of the State Riparian Task Force and is working with the state and other federal agencies to develop a coordinated riparian inventory system for the state as a whole. Current inventory efforts are consistent with existing BLM guidelines and technical standards.

Response 98-3

The proposed plan (Resource Management Plan/Final Environmental Impact Statement) has been changed to include "in cooperation with the Arizona Game and Fish Department."

Response 100-l

The subject lands located on the west slopes of the Santa Teresa mountains have been identified in the proposed plan (Resource Management Plan/Final Environmental Impact Statement)

Response 100-2

Please refer to Map 27 which has been revised to reflect lands identified for acquisition.

Response 100-3

The spring is located on the referenced parcel of land. The list of lands qualified for disposal has been modified to exclude this parcel because of wildlife habitat values.

Response 100-4

See General Response 2 for partial response. Most lands acquired in the exchanges were already under BLM grazing management as part of an allotment. In some cases the allotment categorization changed from custodial to intensive, requiring the development of an allotment management plan. In any case, the uses of these lands will continue under BLM management. Monitoring studies will determine the effectiveness of current management. Monitoring results are reflected in the periodic Range Program Summary Update which displays the progress of grazing decisions originating from the grazing Environmental Impact Statements.

Response 100-5

Bureau policy (Manual 6840) directs BLM to carry out management consistent with the principles of multiple use, for the conservation of candidate species and their habitats. It also ensures that actions authorized, funded or carried out do not contribute to the need to list any of these species as threatened or endangered. Sensitive species may be designated by the State Director in cooperation with other groups and agencies

to receive protection. Species designated by the State Director will receive the same level of protection as candidate species. This process is not tied directly to the planning system; it is ongoing and may change with the changes in species status.

Response100-6

The areas delineated on the maps include the major riparian areas found in Safford District with public land status. As indicated in Alternatives A, B and C, a system to inventory all riparian areas in the District needed to be established. This system has now been established. A system to prioritize riparian area management based upon objectives, resource condition, resource conflict and the potential of the area to respond to treatment needs to be defined. (See General Response 6.)

Response100-7

Many riparian areas in the Safford District do not have aquatic habitat. Aquatic habitat concerns will be incorporated in the development of specific Wildlife Habitat Management Plans if they are not addressed as part of an Area of Critical Environmental Concern, Wilderness, T&E species recovery effort or as part of the Water Resources Concern in this document. (See General Response 6.)

Response100-8

The subject land was part of an exchange with the state. As a condition of the exchange, BLM was obligated to allow grazing authorized by the state leases. Allotment Management Plans are currently being developed that will address grazing in the riparian areas on public lands along the Babocomari River. (See General Response 6.)

Response100-9

The subject changes to the boundaries of Swamp Springs-Hot Springs Watershed and Guadalupe Canyon Areas of Critical Environmental Concern have been made in this Resource Management Plan/Final Environmental Impact Statement. Other Areas of Critical Environmental Concern boundaries are considered in one or more of the alternatives.

Response100-

The uses referenced will be, in most cases, more intensively managed under an Area of Critical Environmental Concern designation. All Areas of Critical Environmental Concerns have special values, but not the same values and do not necessarily require the same management direction or intensity. Approval of all Areas of Critical Environmental Concern management plans will be subject to the completion of National Environmental Policy Act compliance documents. Most Areas of Critical Environmental Concern values can be protected from minerals impacts with the approval of mitigation measures in a mining plan. Similarly if grazing levels will adversely affect the values of the Areas of Critical Environmental Concern, BLM can reduce those levels or eliminate them from pan or all of the Areas of Critical Environmental Concern. (See General Response 6.)

Response100-

All anticipated management actions can be implemented within the Wilderness Management Plan for the areas; therefore, the Area of Critical Environmental Concern designation and management plan would be duplicative. The special values of the Area of Critical Environmental Concern area would be recognized in the management plan developed for the designated Wilderness Area.

Response100-12

BLM cannot implement any action that will affect a listed species without requesting input from the Fish and Wildlife Service. Each area proposed for vegetation treatment, regardless of method, will be subject to an individual environmental assessment with opportunity for public participation. (See General Response 6.)

Response100-13

The Resource Management Plan/Draft Environmental Impact Statement states that BLM can “transplant and augment populations of priority wildlife species” (Page 30, # 4). This allows reintroduction of any of the priority species listed. The text has been changed with respect to the aplomado falcon and woundfin.

Decisions regarding the management of the San Pedro Riparian National Conservation Area are incorporated into this proposed plan (Resource Management Plan/ Final Environmental Impact Statement) by reference.

Response100-14

The Bureau does not introduce or reintroduce wildlife species. BLM coordinates and cooperates with agencies having those responsibilities.

All requests for transplants etc., will be coordinated with the Arizona Game and Fish Department and other agencies as appropriate. BLM will comply with Executive Order 11987 concerning release of exotic organisms.

Response100-15

This specific action/recommendation is not appropriate in an Resource Management Plan. However in developing specific management prescriptions for the area BLM will work closely with the Bureau of Reclamation and other agencies to assess the feasibility and, as appropriate, encourage a plan to build the Aravaipa Creek fish barrier. (Also, see Response 100-49.)

Response100-16

The actions associated with Alternative D (No Action) are based on current management approaches. These are detailed in the Management Situation Analysis. Since that analysis is available for public review at the District office, the wording does not need to be changed.

Response100-17

Change has been made.

Response100-18

Issues, sometimes involved with controversy, provide the focus for the planning process. Issues are based primarily on public input. Management concerns are primarily based on internal input and address those activities in which BLM must engage and which require identification and allocation of resources.

Response100-19

The term "Resource Conservation Area" is a management designation designed to provide management consideration to areas with special resource values that do not require the protection that an Area of Critical Environmental Concern designation confers.

Response100-20

All candidate species are also priority species and as such influence management objectives. Candidate species and their management are also discussed in Management Guidance Common to All Alternatives (see page 18, draft Resource Management Plan/ Environmental Impact Statement).

BLM is required to promote efforts to down-list or delist T&E species. Recovery objectives will be defined, implemented and monitored in approved recovery plans. Recovery teams should include BLM personnel when habitat of listed species include BLM-managed lands.

Response100-21

The general soil objective is to minimize accelerated erosion. In public meetings and as shown in the soils portion of the Management Situation Analysis, the San Simon Watershed was the main problem area. As other activity plans are written, specific soil management objectives will be incorporated into the plan if needed. (See General Response 6.)

Response100-22

All laws under which we function are incorporated in each alternative. Grazing decisions as determined through the grazing Environmental Impact Statements are incorporated by reference into each alternative. (See Chapter 2, Introduction, Paragraph 2.)

Response100-23

See text on page 18, Management Objectives Common to All Alternatives in draft Resource Management Plan/Environmental Impact Statement.

Response100-24

Climatic changes referenced here recognize their effect on the production of wildlife habitat. Drought reduces this potential, while moisture will increase the potential. Climatic changes influence optimum wildlife population capability.

Response100-25

The Resource Management Plan/Final Environmental Impact Statement states that transplant and augmentation of priority and other native wildlife species should occur within the known historic range of the species being transplanted.

Response100-26

The text now includes revisions on indigenous vegetation.

Response100-27

Wildlife input to Allotment Management Plans is provided for all wildlife species and most particularly for priority species. (See General Response 6)

Response100-28

This is correct. While not mentioned specifically, it is inferred under "Management Guidance Common to all Alternatives" on page 18 of the Draft Environmental Impact Statement, Management Concern 1 Wildlife Habitat.

Response100-29

Candidate, threatened or endangered animals and plants are included in the term "natural resource values." Evaluations for these types of plants and animals is a requirement of any land disposal action. (See General Response 6.)

Response100-30

Lands identified for acquisition are shown on Map 27 in this Resource Management Plan/Final Environmental Impact Statement. Lands for disposal are public lands found in the white area of Map 27 and are identified specifically in Appendix 5.

Response100-31

Special Recreation Management Area are defined on page 283 of the Draft Environmental Impact Statement.

Response100-32

The statement of river closure has been deleted from the Resource Management Plan/Final Environmental Impact Statement. This issue will be addressed in the ensuing activity plan for the Gila River. (See General Response 6.)

Response100-33

Appropriate revisions are in the Resource Management Plan/Final Environmental Impact Statement. Vaquelinia californica should properly be listed as a federal category 2 species. Although *Rumex othoneurus* is unlikely to occur on BLM lands, it was included because the plant was submitted by your office in a *Biological Opinion for the San Bernardino Geothermal Environmental Assessment* prepared by BLM in 1980.

Response100-34

Correction to text has been made.

Response100-35

Beaver are presently found in Bonita Creek. Early in the recovery phase they did constitute a threat to the riparian vegetation recovering from destructive flooding in 1979-l 980. They now appear compatible with riparian objectives. The proposed plan does not consider any actions for the San Pedro Riparian National Conservation Area. The land use plan for that area has been incorporated into this document by reference.

Response100-36

Items 14 and 15 will be carried over into the other alternatives. However, the area below Coolidge Dam will be included in a Wild and Scenic River Environmental Impact Statement to be undertaken in the future. If designated, the withdrawal revocation will be pursued. (See General Response 6.)

Response100-37

Allotment Management Plans are revised as needed, according to BLM policy. Plans are generally revised when allottees change and when allotment evaluations reveal a need for a change in management. (See General Response 6.)

Response100-38

The structure now known as the Timber Draw Dam was the originally proposed Tanque structure. The Tanque structure was moved upstream due to poor dam foundation materials at the original location. Because the new location is closer to Timber Draw than to the old railroad water stop at Tanque, the name was changed. The function remains the same.

Response100-39

McColly & Anderson (1987) gives the value of Table Mountain Mining District as 22.2 million dollars. The information in Chapter 3 provides background data only. More detailed mineral evaluations will be prepared prior to any mineral withdrawal actions. (See "Introduction,".)

Response1OO-

The list has been expanded to include the lowland leopard frog.

Response100-41

All habitat components of seven bat species will be protected because of their status as priority species, federally listed or candidate species. Other bat species will be afforded protection through specific management plans. (See General Response 6.)

Response 100-42

The following species have been added to the list on Table 3-3.

Bylas springsnail	(*Apachecoccus arizonae*)
Gila Tryonia snail	(*Tryonia gilae*)
Arizona grasshopper sparrow	(*Ammodramus savannarum ammolegus*)

Response 100-43

The text has been revised in response to this comment. The reference to Cereus greggiivar. *greggii* listed in the *Federal* Register (February 21, 1990) as in federal category 2 has been changed to *Cereus greggii* var. *transmontanus*. We assume that the second species exists in the area and should be listed as federal category 3C.

Table 3-4 lists Cochise pincushion cactus as a probable occurrence. Inventory data in the area of its known occurrence is limited. Until further inventories are completed, we will continue to list the cactus as probably occurring on public lands in the area.

We have no data showing that Acuna cactus occurs on public lands in the Resource Management Plan area. Data on its distribution limit it to below 2,000 feet elevation and typical of the Sonoran Desert type vegetation. The range of distribution given for the cactus seems to limit it to lands administered by the Phoenix District, further to the west.

The Federal Register (Feb 21. 1990) lists *Erigeron lemmonnii* as a federal category 2 species. The Fish and Wildlife Service, in a memo dated March 2, 1990, continues to list the plant as a category 2 species. We are reluctant to change the text until we receive a Federal Register notice to the contrary.

The subject name change of *Neolloydia erectrocentra* var *erectrocentra* to *Echinomastus erectrocentrus* var. *erectrocentrus* has been made.

Response 100-44

Such actions are required for environmental documentation of all proposed land uses.

Response 100-45

The subject areas, listed on page 69 of the draft Environmental Impact Statement are: (1) Desert tortoise: a, e, f, g, h, i, j, k and l; (2) Gila Topminnow: d through l. Your attention is directed to the last paragraph, column 2, page 69. (Also see General Response 6.)

Response 100-46

The reference given described the existing situation within the Bonita Creek Area of Critical Environmental Concern. On page 18 of the draft Resource Management Plan/Environmental Impact Statement the section, "Management Guidance Common to All Alternatives" specifies cooperation with National Marine Fisheries and Fish and Wildlife Service in planning and providing for the recovery of Threatened and Endangered species. Although the Bonita Creek Area of Critical Environmental Concern has been dropped because of the Gila Box Riparian National Conservation Area designation, the prescriptions defined in the draft Resource Management Plan/ Environmental Impact Statement will be carried forward. (See General Response 6.)

Response 100-47

We agree. Gila Box will be sampled and monitored for all Threatened and Endangered and candidate fish species.

Response 100-48

See Response 100-l 4.

Response 100-49

The following objectives are consistent with the proposed plan and have been added to this Resource Management Plan/Final Environmental Impact Statement.

1. Protect native fish and wildlife by exclusion or removal of nonnative species which may adversely affect native species.
2. Protect and restore springs and seeps and their native vegetation and wildlife.

Response 100-50

The presence of the Mexican garter snake has been confirmed in the San Pedro Riparian National Conservation Area. It is, however, the only known site in the Safford District.

Response 102-1

The following areas mentioned in your letter as well as others were considered but determined ineligible as follows:

Not reasonable flow or length

San Simon
Guadalupe Canyon
Black Wash
Oak Grove Canyon
Hot Springs Creek
Spring Canyon
Mescal Creek
Wildcat Canyon
Horse Camp Canyon
Parsons Canyon
Virgus Canyon
Markham Creek
Fishhooks Canyons
Numerous others

Less than 40% public land along identified segment

Bass Canyon
Redfield Canyon
Eagle Creek
Cherry Springs

(See Appendix 3 for explanation.)

Response 103-l

See Response 20-l.

Response 103-2

The statement of river closure has been deleted. This issue will be addressed in an ensuing activity plan for the Gila River. (See General Response 6.)

Response 105-l

See response 76-l.

Response 11 O-l

This information is part of the description of the Affected Environment. The source of the data was the Valley National Bank "Arizona Statistical Review." Analysis of the alternatives does not show that there would be any significant adverse impacts on the economic sector.

Response 11 l-l

The impact analysis of the alternatives is focused on identifying those actions that may significantly affect the quality of the human environment. Because the actions are relatively general and because subsequent specific activity-level plans depend on National Environmental Policy Act compliance review, the impacts of implementing actions are generally not significant. If an action that would adversely affect an economic sector is contemplated, a benefit-cost analysis would be part of the environmental compliance document.

The impact analysis section (Chapter 4) has been reconsidered and, where necessary, revised. The impacts have been evaluated on a geographic (local, Districtwide) basis and have been reclassified as appropriate.

Response 11 l-2

See General Response 1.

Response 11 1-3

In 1981 only the San Francisco River was studied. BLM is required to assess Wild and Scenic Rivers in the Resource Management Plan pursuant to BLM planning regulations. The lower San Francisco was recognized as an integral part of the Gila system and should be analyzed in this context.

Response 11 l-4

This has been readdressed. Also, see Response 111-l.

Response 11 l-5

Between the two statements you quoted is the statement "Regulations require that mining operations be carried out in a manner that does not cause undue or unnecessary degradation of the environment." The next sentence has been revised to include "undue or unnecessary."

Response 11 l-6

The text has been changed. Bullet 4 now reads "Which lands should be closed to the operation of the mining laws." Bullet 5 has been deleted. Terms, conditions and special stipulations are the function of a mining plan or site-specific action and will vary in each case. See General Response 6.

Response III-7

The Resource Management Plan/Final Environmental Impact Statement describes 13 Areas of Critical Environmental Concerns totalling 31,949 acres. Of that acreage, 9,829 have requests for withdrawal from mineral entry prescription. Also see Response 91-l.

Response 11 l-8

The water in question is the surface flow within the stream. Safford's water supply is basically groundwater from the watershed. Many resource values in the Bonita Creek area depend on the quality of the surface water, i.e. fish, wildlife and riparian vegetation. BLM is required by the Federal Land Policy and Management Act of 1976 to protect these values, and monitoring of these values is consistent with our management responsibility.

Monitoring shows the surface water flow in Bonita Creek is of high quality. Consequently, the stream has been nominated for protection under Arizona's Unique Waters designation. (See "Unique Waters," page 29 of the Resource Management Plan/Draft Environmental Impact Statement.) The water quality will be protected and enhanced through appropriate management of the watershed below the reservation boundary in accordance with Arizona Department of Environmental Quality criteria for the Unique Water designation.

Should the water quality decline, measures will be undertaken as necessary, to restore the stream to its original high quality.

Response 11 l-9

See Response 91-l.

Response 11 l-l 0

If a valid mining claim exists at the time of mineral withdrawal, the inherent rights of that claim will be honored.

Response 111-11

The lands referenced adjacent to the tailings facilities near Morenci have been identified for disposal in the Resource Management Plan/Final Environmental Impact Statement. (See General Response 6.)

Response 11 l-12

This withdrawal table includes the acreages from the proposed Areas of Critical Environmental Concerns.

Response 11 l-l 3

The Arizona Electric Power Company line is contained within a proposed utility corridor. The text has been changed to state that new rights-of-way outside the corridor would not be allowed within the Area of Critical Environmental Concern boundary. Existing rights-of-way, if not perpetual, would probably be renewed.

Response 11 l-l 4

At the time of preparation of state air quality standards, many of the smelters were operational and were producing sulfur dioxide which has been implicated in acid precipitation. Since that time some smelters in the area have either ceased operations or have changed to alternative methods of concentration. The Environmental Protection Agency lists the communities cited in the text of the Draft Environmental Impact Statement as non-attainment areas due to sulfur. We recognize the problem of air pollution is a complex one and single causes are not the entire problem. Literature on the subject consistently points out that airborne pollutants may travel hundreds of miles before returning to earth as dry fallout or acid rain. The stability of the pH readings locally would seem to indicate that the area smelters are not the major contributing factors of the local acid rain. Other sources of pollution such as automobiles, power plants and agriculture probably contribute to the airborne pollutants in the Safford District.

Response III-15

Correction has been made to the text.

Response III-l 6

The information in Chapter 3 provides background data relevant to analyzing significant impacts. It is not meant to be exhaustive. See "Introduction" Draft Environmental Impact Statement, p. 125.

Response 11 l-17

The Eagle Creek Bat Cave Area of Critical Environmental Concern listed in the Preferred Alternative includes only public lands administered by BLM, with management tied directly to the cave and Mexican free-tailed bats.

Response 11 l-l 8

A change has been made to the text.

Response 11 l-l 9

Exchange is the preferred form of acquisition. See General Response 6.

Response 11 l-20

The proposed Gila Box Area of Critical Environmental Concern boundary includes that portion of the area deserving special protection which lies outside the boundaries of the Gila Box Riparian National Conservation Area.

Response 111-21

See Response 11 l-l 3.

Response 111-22

This item referring to actions under Alternative B is consistent with an emphasis on greater protection. The social and economic impacts associated with the implementation of this alternative were not found to be significant.

Response 11 l-23

The focus of the Resource Management Plan is to consider acquisition of lands and to analyze the impacts of acquiring lands that are ecologically important to management of adjacent public lands without regard to their availability.

Mixed land ownership does not preclude designation of an Area of Critical Environmental Concern on public lands. Management is possible through the development of a cooperative management agreement signed by all parties. (See General Response 6.)

Response III-24

BLM procedures require an analysis of Wild and Scenic Rivers in the Resource Management Plan planning process. See Response 11 l-3 and Appendix 3 for additional information.

Response 111-25

The text has been modified.

Response 11 l-26

See Response 11 l-23.

Response 111-27

See Response 11 l-l 1.

Response 11 l-28

The private land in Section 12, Township 5 South, Range 29 East is limited to a small mineral patent. This, along with numerous scattered parcels of public lands, were not shown due to the small scale of the Resource Management Plan map.

Response 112-l

See Response 102-l.

Response 112-2

Legal subdivisions were used in determining the boundary of the area. In all cases the boundary includes the Gila River corridor except where private lands come near the river corridor. These boundaries are also consistent with other designations pending for the area.

Response 112-3

Classification has been reexamined in this Resource Management Plan/Final Environmental Impact Statement.

Response 112-4

See Response 102-l.

Response 112-5

See Response 102-l.

Response 113-l

The draft Resource Management Plan/Environmental Impact Statement, page 16, in the section, "Management Guidance Common to All Alternatives," states that the Desert Tortoise Rangewide Plan 'will be incorporated into all alternatives considered in this plan."

Response 113-2

Tortoise management issues were addressed throughout the draft document. We refer you specifically to the following:

a. Page 23, Alternative A, Issue 1, Access. This contains two approaches applicable to desert tortoise management. Item 2 minimizes the impacts of existing and proposed access; Item 5 addresses road closures. Also, Objective 8E requires mitigation to reduce rights-of-way impacts.

b. Page 26, Table 2-l. This identifies Threatened and Endangered species in the Swamp Springs-Hot Springs Watershed Area of Critical Environmental Concern as a value and proposes a management prescription that would benefit the desert tortoise present within the Area of Critical Environmental Concern boundary.

c. Page 29, Issue 3, Off-Highway Vehicles. This stipulates that only one small area containing no known desert tortoise habitat will be open to off highway vehicles within the District. The remainder

will be closed to off highway vehicles or limited to existing roads and trails. By including Category III habitat in an off highway vehicle restriction area, we have exceeded Objective 9A of the Rangewide Plan, which only discusses Categories I and II habitat.

ct. Page 30, Management Concern 1, Wildlife Habitat. This identifies the desert tortoise as a priority species in item lc. It recommends actions that would benefit tortoise management in inventory, habitat management, monitoring, habitat improvement, prescribed fire, wildfire suppression, activity plans, categorization and Areas of Critical Environmental Concerns.

e. Page 31, Management Concern 2, Lands and Realty. This requires consideration of tortoise habitat as a factor in land disposal evaluations and as a reason for acquisition of lands. It is consistent with Objective 8 of the Rangewide Plan.

f. Pages 135-l 36. This material describes the desert tortoise habitat requirements.

g. Pages 247-248. This Appendix contains specific management objectives for the desert tortoise in the Safford Resource Management Plan.

Response 113-3

The BLM planning manual requires that Resource Management Plan resource management objectives follow specific directions included in the "Supplemental Program Guidance" (Manual 1620-l 622). The habitat-related determinations in this Resource Management Plan comply with the Supplemental Program Guidance. By incorporating the Rangewide Plan into this Resource Management Plan by reference, tortoise objectives for the Resource Management Plan have been clearly defined.

Response 113-4

Apparently there is a misunderstanding here on inventory efforts. A search for potential habitat areas began in 1987, and inventories were started in July 1988. Funds were allocated for about four work months for desert tortoise inventory in 1988 and 1989. Since these inventories are not completed we need to continue the inventories to meet the the Resource Management Plan's 1992 deadline for categorization.

Response 113-5

The Safford District has met or is in the the process of meeting all objectives set forth in the Desert Tortoise Management Plan. The Resource Management Plan is not the appropriate document to display all of the discrete actions to meet those objectives. See Response 113-2 for some of the major issues which relate to desert tortoise management. Also, see General Response 6.

Response 113-6

The Council on Environmental Quality regulations for implementing National Environmental Policy Act require that a range of alternatives be considered. The range of alternatives in this Resource Management Plan/Environmental Impact Statement provide realistic options for multiple use management.

Response 113-7

The statement has been revised. BLM evaluates the quality of wildlife habitat very carefully prior to any land transaction being completed. If the land being exchanged has high-quality habitat, then the action would probably not go forward. Low impacts would then occur because only lower quality habitat is being removed from BLM management. (See General Response 6.)

Response 113-8

We regret the omission of the Desert Tortoise Council from the list of individuals and organizations. The Resource Management Plan/Final Environmental Impact Statement has been corrected.

Response 113-9

Copies of this Resource Management Plan/Final Environmental Impact Statement were sent to all those on our mailing list and will be sent to anyone else requesting copies until stocks are exhausted.

Response 116-1

As stewards of the land, BLM is required to complete an activity plan for the Aravaipa area. The plan will address the concerns of recreation use. A plan does not increase recreation activity but sets an appropriate framework for recreation to occur that does not affect other sensitive resources. We have no plans to increase the Aravaipa Canyon Wilderness visitor use limit.

Response 117-l

The existing gate at Eagle Creek Bat Cave is currently locked. Interpretive conservation messages will be addressed within the Area of Critical Environmental

Concern management plan. Firearms prohibitions can be initiated by BLM within the cave, but land ownership by Phelps Dodge necessitates their agreement to broaden firearm restrictions. (See Responses 76-1, 76-2 and 86-l and General Response 6.)

Response 118-l

BLM is evaluating the need for a better gate, and your offer of design assistance is appreciated. Conservation messages will be developed as part of an interpretive plan for the cave.

Response 119-1

Acquisition of additional lands will only be pursued if there is a willing seller. The need for a better gate at Eagle Creek Bat Cave is being evaluated and will be addressed in the Area of Critical Environmental Concern plan. Educational messages will be developed as part of an overall interpretive program for the Area of Critical Environmental Concern. (See General Response 6.)

Response 120-l

Refer to page 134 of Resource Management Plan/ Draft Environmental Impact Statement.

Response 124-1

Seasonal restrictions on off-highway vehicle use can be established in areas such as Areas of Critical Environmental Concerns where the values need to be protected. However, closure of all riparian areas to off-highway vehicles during nesting or breeding seasons would not be reasonable since it could adversely restrict other uses of public lands that would not disturb nesting raptors. Restriction of vehicles to existing roads will provide sufficient protection since nesting raptors select sites with a tolerable level of disturbances. Observations indicate that disturbance from vehicles on established roads is much less than from pedestrians who travel slower and will meander towards interesting areas such as defended nests.

Response 125-1

The Resource Management Plan identifies the Black Hills and Round Mountain Rockhound Areas as needing some recreation planning and development. A project plan will be prepared to determine the type and amount of development at each rockhound area. As part of the project plan preparation, we will consider ripping (plowing) small portions of the rockhound areas. The project plan will also include an environmental document to determine the impacts of implementation. (See General Response 6.)

Response 125-2

This site has potential to be developed as a public rockhound area. This location has been added to this Resource Management Plan/Final Environmental Impact Statement as an area needing some recreation planning and development. A project plan and appropriate National Environmental Policy Act compliance documents will be prepared prior to any development. (See General Response 6.)

Response 127-1

See Response 5-1.

Response 129-1

See Response 124-1

Response 129-2

See General Response 4.

Response 130-l

These access routes have been identified for future negotiation of easements to allow access for the public into the area. The district is also developing a transportation plan which will identify all areas in need of reasonable public access. (See General Response 6.)

Response 131-l

See Response 5-1.

Response 132-1

The BLM Safford District has no authority to change the Wilderness Act or BLM Wilderness Management policy as regards the use of minimum tools. Specific Wilderness management prescriptions are prepared for designated Wilderness areas in compliance with the Wilderness Act, BLM Wilderness policy and Arizona BLM guidelines in Wilderness Management Plans. Approval of these plans is subject to prior completion of National Environmental Policy Act compliance documentation (see General Response 6.)

Response 132-2

See Response 20-l.

Response 132-3

In the desert ecosystem that comprises most of the Safford District, wildlife populations fluctuate widely because of shifts in rainfall and vegetation. Our habitat

management objective is to reduce these population fluctuations by providing supplemental resources such as water sources and/or reduced livestock numbers during droughts. BLM will support Arizona Game and Fish Department proposals for increased hunting opportunities (for game species) or support transplants of Threatened and Endangered species when populations are very high. The optimum populations would be based on the reproductive potential, longevity, management objectives of each species and the ecological conditions present in an area as well as the role the species plays in an ecologically functional community. It will be somewhere between the minimal viable population and the carrying capacity of an area. Optimum population has now been defined in the Glossary.

Response 135-l

Roads in riparian areas will be examined to determine if they can be moved to routes with less environmental impact than they now present. Any action to remove or close roads in riparian areas will be subject to the completion of a National Environmental Policy Act compliance document, and will be coordinated with riparian objectives and the District Transportation Plan.

Response 135-2

Visual Resource Management Class I designations are generally reserved for congressionally designated areas such as wilderness areas or for Areas of Critical Environmental Concerns where designation is based solely on scenic values.

Response 135-3

See Response 124-1

Response 135-4

See General Response 4.

Response 135-5

Actions pertaining to the San Pedro Riparian National Conservation Area are not addressed in this Resource Management Plan. See page 15, Draft Resource Management Plan/Environmental Impact Statement.

Response 135-6

The values of wildlife resources are considered in all land acquisition and disposal actions. All aspects of habitat management are reviewed.

Response 141-l

See Response 5-1.

Response 142-l

See Response 5-l.

Response 143-l

See Response 5-l.

Response 144-l

See General Response 2.

Response 144-2

See Appendix 6, pages 247-249, of the draft Resource Management Plan/ Environmental Impact Statement.

Response 145-l

See Response 15-1.

Response 145-2

See General Response 4.

Response 145-3

See Response 135-1.

Response 145-4

See Response 135-2. Areas of Critical Environmental Concern designations of any new land acquisitions can only occur through preparation of an Resource Management Plan amendment and public review.

Response 145-5

See Response 135-6.

Response 145-6

Areas behind erosion control dams are routinely fenced off and livestock excluded until revegetation is accomplished. Livestock are then allowed to use the area under a grazing system designed to protect the revegetated area.

Response 146-l

See Response 112-l.

Response 147-I

BLM policy is to manage livestock in riparian areas to minimize impacts and to enhance these areas. All Allotment Management Plans have or will have riparian management objectives tailored to the needs of the riparian area. The Safford District has also prepared a riparian area management policy for the District. (See General Response 6.)

Response 147-2

Planning will be detailed to this level in a subsequent activity plan.

Response 147-3

See Response 147-2.

Response 147-4

Tamarisk control is desirable and is presently occurring in the Aravaipa Canyon area. Hand grubbing is the only alternative available in the Aravaipa Canyon Wilderness, and this method is satisfactory. Reinfestation from sources outside the Wilderness Area can be controlled by this manual method.

Response 148-I

See General Response 2.

Response 148-2

See Response 144-2.

Response 149-I

See Response 147-1. In addition, Tule Springs is not on public lands.

Response 150-I

We prefer to allow natural revegetation to occur wherever possible, but we will retain the option of reintroducing native species where necessary. We have included an option of removing non-native vegetation (such as tamarisk or alianthus) from riparian areas where practical. (Issue 4, Item 9)

Response 150-2

See Response 112-I.

Response 150-3

Livestock grazing is prohibited within the San Pedro Riparian National Conservation Area. Grazing on other public lands are addressed in individual Allotment Management Plans. You may want to also examine the data and maps in the Safford District grazing Environmental Impact Statements (Upper Gila-San Simon, Eastern Arizona) and to look at the Range Program Summary documents. Grazing also was discussed on pages 139-140 in the draft Resource Management Plan/Environmental Impact Statement.

Response 150-4

This has been corrected.

Response 152-I

See Response 14-2.

Response 152-2

The land status map in the draft Resource Management Plan/Environmental Impact Statement will not be reprinted. New maps or revisions now show the realignment of the San Carlos Indian Reservation and Coronado National Forest boundary.

Response 152-3

Data indicates that access is needed across the reservation for the use of the recreating public. The BLM will work with the Tribe to resolve any concerns and to reach mutually acceptable solutions.

Response 152-4

The draft Resource Management Plan/Environmental Impact Statement stated that the "San Carlos Tribe has not expressed an interest in seeing the Gila River designated a pan of the National Wild and Scenic River System and in providing for its management" (p. 244). At the time of activity-level planning each specific proposal identified in the Resource Management Plan will be addressed. The Tribe will be invited to join in the planning effort at that time. BLM realizes that these proposals may potentially affect tribal lands. BLM also agrees issues of trespass will require coordination and cooperation.

Response 152-5

Managing cultural resources for public values, which includes socio-cultural values of Native Americans and other groups, is one of the three objectives specified for cultural resources under all Resource Management Plan alternatives. The proposed ethnographic studies for Bonita Creek and Aravaipa Canyon under Alternatives A, B, and C would provide for the identification of traditional lifeway values. The identification of

socio-cultural values described in Alternative D would also provide for the identification of traditional lifeway values.

Response 152-6

Aboriginal hunting rights of the San Carlos Apache Tribe on public lands are not abrogated in any way by the Resource Management Plan. Hunting of game animals is an activity regulated by the Arizona Department of Game and Fish, as is the taking of fish. Gathering, except for firewood, is permitted subject to state requirements regarding certain protected species.

Response 153-I

Only those portions of the Jackson Cabin Road which are in need of immediate repair will be upgraded. It will be retained as a 4x4 route.

Response 153-2

Turkey Creek has one pair of black hawks. The typographical error has been corrected.

Response 153-3

See Response 76-2.

Response 153-4

Eagle Creek is almost entirely privately owned. Unless significant land exchanges could be accomplished, BLM will have little influence on the uses of the riparian portion of the canyon, which is also the area of access.

Response 153-5

See Response 98-2.

Response 153-6

Correction to text has been made to alleviate any confusion.

Response 153-7

After the Resource Management Plan is selected, specific management plans and actions will be developed with appropriate National Environmental Policy Act compliance documentation. A Resource Management Plan Implementation Plan containing implementation priorities, a monitoring plan and mitigation measures will be developed after the Record of Decision selecting the Resource Management Plan is issued.

Response 153-8

Allotment Management Plans do consider wildlife needs. These two actions relate to special considerations given priority species.

Response 153-9

The discussion on page 135 of the draft Resource Management Plan/Environmental Impact Statement has been revised to make it consistent with Chapter 2.

Response 153-I 0

Montezuma quail have specific habitat requirements and a group of priority species requiring oak-woodlands habitat can be managed simultaneously. Scaled quail and Gambel's quail have less specific habitat requirements, so there is little overlap with other species with similar management needs.

Response 153-I 1

The spelling error has been corrected.

Response 153-I 2

Selection of Alternative A or B would authorize the planning and introduction of the Gould's turkey as requested by the Arizona Game and Fish Department. The introductions would take place in areas with high densities of oak trees near riparian areas.

Response 153-I 3

Continued close coordination between the Forest Service and BLM concerning prescribed fire should alleviate any management conflicts between the agencies.

Response 153-I 4

The definition of public lands appears in the Glossary and is appropriate for lands administered by the BLM.

Response 153-15

Close coordination between BLM and the Forest Service is a prerequisite to the successful management of the Muleshoe Ranch or any other similar area. BLM has not established a management goal for "preservation" of this area but would manage for the best uses consistent with resource values, should additional private or state lands be acquired.

Response 153-I 6

The Arizona Trail and the Galiuro/Aravaipa/Santa Teresa Trail are two separate entities. The Arizona Trail does not cross the Safford District. The Galiuro/Aravaipa/Santa Teresa Trail is only a proposal at this time. The BLM will coordinate with the Forest Service office in preparing any specific plans that would involve the lands they administer.

Response 153-17

An intensive archaeological inventory of all lands in the Safford District is not considered a reasonable action because of the high costs that would be incurred in surveying almost one and a half million acres of public land. With regards to vandalism, the District has conducted some field inventories to document damage and acquire information on patterns of vandalism to cultural properties. As funds become available, further field inventories focusing on areas most affected by vandals will be completed and the information added to the existing data base.

Response 153-18

The Safford District has no intention of using predictive modeling as a substitute for conducting on-the-ground inventories. This is specifically prohibited in BLM manual guidelines on cultural resource management.

The major usefulness of predictive modeling is in the area of planning, especially regarding the budgeting and evaluation work needed to assess a given area's cultural resource sensitivity. Models are very useful for determining the funding and personnel needed for conducting on-ground inventories, particularly those involving large tracts of land. Budget figures are calculated from the quantity and nature of the resources predicted to occur. Without the use of such models, large-scale inventories often run out of money long before the work has actually been completed.

Predictive models are also useful for estimating the cultural resource values of lands being considered for either acquisition or disposal.

Response 153-I 9

Special attention has been directed to the documentation of rock art due to its extremely vulnerable nature. Many of the known sites in the District are being eroded due to natural forces, while others are often the object of vandalism.

Revision of the existing District Rock Art Cultural Resource Management Plan (the "research design") will simplify many of the documentation requirements that have inhibited past rock art recording efforts within the District. The revision is expected to represent a modest expenditure for BLM.

Response 153-20

The District has an active volunteer program to assist in collecting ethnographic and other types of oral history information. We anticipate that adequate funds will be obtained to facilitate research.

Response 154-I

Opening of Virgus Canyon Road could increase disturbance to wildlife on approximately 9,000 acres of public lands. Rebuilding the road will make it accessible to four wheel drive vehicles.

BLM is encouraged to provide legal access to large blocks of public land where resource conflicts would be minimal. Approval of a District Transportation Plan and specific actions such as construction of the Virgus Canyon Road is subject to the prior completion of National Environmental Policy Act compliance documentation. See General Response 6.

Response 154-2

See General Response 2.

Response 154-3

Recreational use of the Hot Well Dunes area includes hunting, off-road vehicle use, camping, bathing and picnicking. BLM has placed several trash cans in the area to help control litter from the users. BLM has not yet established a campground facility.

The Resource Management Plan calls for designating the Hot Well Dunes area as a Special Recreation Management Area to manage current recreation use. An activity plan will then be prepared before designating the area as an open off road vehicle use area and developing facilities. As part of this plan, a complete cultural and paleontological inventory will be conducted to determine impacts to the resources and to provide mitigation measures to eliminate or reduce the impacts. (See General Response 6.)

Response 154-4

Specific recovery plan details are not within BLM's responsibilities as they are prepared by the Fish and Wildlife Service. BLM will follow the direction of the recovery plans as they pertain to the District. This direction is indicated on page 19 of the draft Resource

Management Plan/Draft Environmental impact Statement.

Recovery plan objectives of each Threatened and Endangered wildlife species involved are reviewed by BLM for coordination between agencies responsible for the species and those agencies with habitat responsibilities.

Response 154-5

See Response 5-l.

Response 154-6

Management objectives will be specific for each Area of Critical Environmental Concern. Management plans to meet those objectives will necessarily be specific also. Livestock grazing is one of the uses that will have to be evaluated to determine the effects of grazing within a particular Area of Critical Environmental Concern. If the grazing will not compromise any resource values being managed, then it may continue. If the grazing cannot be managed successfully, then it may be discontinued.

Response 155-l

The term "limited off-highway vehicle use" is defined on page 281, Glossary in the draft Resource Management Plan/Environmental Impact Statement. Use of the existing road through Turkey Creek will not be restricted by the Area of Critical Environmental Concern.

Response 155-2

See Response 132-3.

Response 156-1

See General Response 2.

Response 156-2

See General Response 2.

Response 1563

BLM current policy and practice is to leave 60 percent of the vegetation after grazing.

Response 156-4

The Upper-Gila San Simon Environmental Impact Statement and Eastern Arizona Grazing Environmental Impact Statement state the standards by which grazing impacts will be judged. The Record of Decision and/or Rangeland Program Summary for the two Environmental Impact Statements give the categorization for each allotment in the District and status of management. On pages 139-l 40 of the draft Resource Management Plan/Environmental Impact Statement is a complete definition of the three management categories.

Response 156-5

In the specific case of riparian vegetation, the "benchmarks" are the few relict areas that have never, or seldom ever been directly disturbed by human activities. Based upon the physical and biological factors that resulted in these relict locations we have established goals for the riparian areas being actively managed. The ecological potential of each riparian area may differ due to physical parameters and therefore "good" condition vegetation may look and function differently in individual areas.

For other plant communities we will use relict areas (such as the Desert Grassland Area of Critical Environmental Concern), historical accounts (ethnoecology), scientific literature and/or the best professional judgment to determine the ecological potential. In some communities, such as the desert grasslands, we also include the desired objectives of management since the ecological climax is less stable hydrologically and will support fewer livestock and less wildlife species than when fires occasionally burn patches of brush and grasses.

Response 156-6

The purpose of a Resource Management Plan is to provide general management guidance (43 CFR 1601 .O-5 (k)(7)). Implementation priorities will be defined when the Safford Resource Management Plan is selected.

Budget considerations or estimates before the plan is selected would be premature because of the general nature of the Resource Management Plan process and the subsequent activities involved in preparing specific plans and associated National Environmental Policy Act compliance documentation. Budget considerations for the other BLM areas mentioned in the comment are not relevant for this Resource Management Plan/Final Environmental Impact Statement. Detailed information on the BLM budget process can be obtained from personnel in the Safford District Off ice.

Response 156-7

See Response 5-l.

Response 156-8

Portions of Turtle Mountain and Day Mine Wilderness Study Areas were evaluated for Areas of Critical Environmental Concern consideration during the development of the draft Resource Management Plan/ Environmental Impact Statement. They did not meet the basic Area of Critical Environmental Concern criteria and were dropped from further Area of Critical Environmental Concern study. (Table 3-6: Markham Creek, Trujillo Canyon and Turtle Mountain.)

Evaluations of the three Wilderness Study Areas you nominated did not meet basic Area of Critical Environmental Concern criteria. The documentation for these evaluations is now included in Appendix 2.

Response 156-9

Discussion included in Response 115-8.

Response 156-I 0

Discussion included in Response 156-8

Response 156-I 1

Discussion included in Response 156-8.

Response 156-12

BLM has tried to avoid overlapping designations of land. Management prescriptions for the Areas of Critical Environmental Concern will be included in the management prescriptions of the Wilderness Management Plan. (Also, see General Response 6.)

Response 156-I 3

This option will be considered when the management plans are developed. If a single management plan cannot be defined for the entire area, then the Area of Critical Environmental Concern may have to be divided.

Response 156-I 4

Eligibility and classification have been analyzed in the Wild and Scenic River Study reports in identified in Appendix 3. Clarifications have been made in this Resource Management Plan/Final Environmental Impact Statement.

Response 156-I 5

The Hot Well Dunes area is designated as an open off-road vehicle use area partly because it is near several population centers. If, after National Environmental Policy Act compliance documentation is completed, the area is developed as an open off -road vehicle use area, it will be clearly signed as such, and will be closely monitored by BLM personnel. All other areas will either be closed to off highway vehicle use or be designated as limited to existing roads and trails.

Response 156-I 6

The Resource Management Plan presents reasonable goals which could be achieved in the 15-year scope of this plan. As you have indicated, influences beyond our control could limit our success and therefore make our 75 percent goal unobtainable.

Response 156-17

See Response 147-1

Response 156-I 8

See Response 147-1

Response 156-I 9

The Safford District Riparian Area Management Policy indicates no need to exclude every riparian area from livestock grazing to meet riparian area objectives. BLM has actively engaged in meeting these objectives through development of exclosures along Bonita Creek and the Gila River and many smaller areas. Exclosures are only one of many management tools for improving riparian vegetation.

Response 156-20

See Response 11 l-20.

Response 156-21

Data shows no appreciable harm has been done to Aravaipa Creek by livestock grazing in the Aravaipa watershed. Appropriate livestock management in the northern portion of the Area of Critical Environmental Concern will provide adequate protection to the watershed values.

Response 156-22

The area nominated for Research Natural Area designation is included in the Proposed Action. The other riparian areas you referenced were inventoried but have not been nominated because they did not qualify or because they are adequately protected by other designations or legal requirements. Also see Response 174-4.

Response 156-23

See Response 100-8.

Response 156-24

Impacts of mining operations including release of any toxic metals or chemicals must be considered in any mining plan approval. Mitigating actions and stipulations to eliminate or minimize impacts are defined on a site-specific basis in accordance with the 43 CFR 3809 regulation and the completion of National Environmental Policy Act compliance documentation. (See General Response 6.)

Response 156-25

Under the 1872 Mining Law, as amended, mining of locatable minerals is not discretionary with the BLM. The 43 CFR 3809 regulations require the approval of mining plans which include measures to mitigate impacts.

Response 156-26

See General Response 5.

Response 156-27

Less than one-third of the original Rock Art Cultural Resource Management Plan has been implemented since its inception six years ago. Revisions to the plan which would simplify documentation requirements and allow implementation at a more appropriate pace are contemplated.

One of the primary reasons for developing a regional research design is to help to identify the scientific values of a region's cultural resources. Measurement of scientific values would be extremely difficult without a regional research design to tell us exactly what kind of phenomenon constitutes a "scientific value."

See Response 153-18.

Response 156-28

The need for a more effective gate at the Eagle Creek Bat Cave is currently being evaluated. Since most of the canyon bottom is owned by Phelps Dodge, access and firearm restrictions are beyond the scope of this Resource Management Plan/Environmental Impact Statement. Educational messages are part of the cave management that will be developed in the site-specific plan. (See General Response 6.)

Response 156-29

See Response 100-43.

Protection and enhancement of the watershed in the Aravaipa area are concerns of BLM. Herbicides and pesticides would only be used after stringent evaluation and the development of National Environmental Policy Act compliance documentation entailing public participation. (See General Response 6.)

Response 159-l

See General Response 2.

Response 161-l

The BLM Safford District has nominated the 21 mile long Old Safford-Clifton road as the Black Hills Back Country Byway. Other areas could be nominated if public support warrants. The Back Country Byways program is not a function of the Transportation Plan.

Response 161-2

The Bureau and Arizona Game and Fish Department agreements for wildlife water maintainance are valid regardless of changes to special management designations. On several allotments, such as the Muleshoe and Southrim, perennial springs and creeks are so abundant that the loss of the few developed waters would have little impact on wildlife. On other, less watered allotments, the livestock waters are vital to maintaining optimum wildlife populations. BLM will request aid from Arizona Game and Fish Department and conservation organizations to help maintain important water sources.

Response 162-l

See General Response 3. Actions proposed in Alternative B may well be included in the Proposed Plan. If determined necessary, BLM will negotiate Memorandums of Understanding or Cooperative Agreements with Arizona Department of Environmental Quality or other parties for the bioassessments.

Response 162-2

Appendix 11, now Appendix 9, lists all the sites on the Safford District where some water quality sampling has occurred. The frequency of collection varied from a one-time sample to a number of samples each year for a number of years. The frequency depended on the management objective. The number and type of water quality measurements also varied according to objectives

During the current fiscal year, data from seven perennial streams are being collected, five of them two or more times. The BLM consulted with Arizona Department of Environmental Quality on the design of the monitoring program. All water quality data will be entered in STORET at the earliest possible time.

Response 162-3

None of the parcels of land identified for disposal or exchange in Appendix 7, now Appendix 5, are located adjacent to or straddle any major waters of the United States.

Response 162-4

BLM will continue to be flexible in updating Allotment Management Plans and protecting the resources. Monitoring and inventorying soil erosion, riparian habitat and water quality will continue. The results of the inventories and monitoring will provide BLM with information to make the necessary revisions in any type of management.

Response 162-5

See General Response 2.

Response 162-6

See General Response 2.

Response 162-7

See General Response 2.

Response 162-8

See Response 15-1

Response 162-9

The San Simon floodplain is managed by a variety of methods, all of which are designed and working to improve the riparian habitat. Behind the Barrier detention dam, livestock are excluded from a 300-acre area to provide protection while vegetation recovers. Above the San Simon Fan structure, livestock are on a rotational grazing system providing periodic rest from livestock grazing. Farther above the Fan structure, in the Contest Well seeding, cattle are on a seasonal system, grazing during the winter months only.

Response 162-I 0

See Response 156-19. The public lands in the proposed Areas of Critical Environmental Concern have retained their important resource qualities under management systems that will be continued or improved to enhance riparian, water quality, soil stability, vegetation and wildlife resources.

Response 162-I 1

The causes of soil erosion have been documented over the years and are well understood. They include historic overgrazing, roads, drought followed by heavy rains, soil types that are easily eroded and improper agricultural methods creating head cutting. What remains is a long, laborious process of recovery. The recovery process requires good livestock management, restoration of stream gradients, and vegetation manipulation where appropriate.

Response 162-I 2

The livestock management practices for the allotments on Bear Springs Flat were implemented in the early 1980s. Monitoring indicates that our soil erosion objectives are being met under current management and use.

Response 162-I 3

Standards for unacceptable erosion in the Hot Well Dunes Area have not been established.

Response 162-I 4

Maps showing erosion susceptibility are in the "San Simon Soil Survey" and erosion condition maps can be examined at the District Off ice. Production of maps at the scale required to show erosion condition on a small area in the planning area is not considered feasible.

Response 162-I 5

When vegetation manipulations are proposed on a specific area, National Environmental Policy Act compliance documentation will be completed on a project with site-specific objectives, designation of target species, evaluation of impacts and prescription for future management.

Response 162-I 6

See Response 162-I 5.

Response 162-17

See General Response 4.

Response 162-I 8

Appendix 9 lists only those sites where samples were collected or testing was performed to determine the quality of the water. For an in-depth explanation, please refer to the Water Resources section in Chapter 3, subheading Water Quality (draft Resource Management Plan/Environmental Impact Statement, p. 129). A number of sites were sampled in the late 1970s; most sampling occurred by the mid-l 980s. The criteria for water quality sampling or testing were basically concern for public health, management concerns or objectives and Unique Waters program.

Water quality monitoring of the Gila River has been conducted by several agencies including the Fish and Wildlife Service, Geological Survey and Arizona Department of Health Services. Water quality monitoring of the Gila River is not currently a management objective. BLM has constructed fencing adjacent to the Gila Box to reduce the effect of livestock on the area.

Guadalupe Canyon lands were acquired from the state in a land exchange in 1988. BLM is bound by agreements between the ranchers and the state for the term of the permits.

Response 162-I 9

Only significant benefits and impacts are considered in the draft Resource Management Plan/Environmental Impact Statement. There may be significant benefits to riparian vegetation and to wildlife habitat, but not within the 15-year plan. Water quality will improve, but not to a significant degree.

Response 162-20

The Arizona Desert Wilderness Act of 1990 included 12,711 acres in the Aravaipa Canyon and 6,600 acres in the Redfield Canyon (Galiuro) Wilderness areas.

Response 162-21

See Response 112-l.

Response 162-22

BLM has specific restrictions for rights-of-way involving corridors and communication sites and for rights-of-way outside designated corridors (43 CFR 2806 and 2600). National Environmental Policy Act compliance and specific site requirements can determine sideboards. These are considered when determining terms and conditions for rights-of-way, which can vary considerably depending on requests and site-specific requirements.

Response 162-23

Providing corridors one-mile wide is a common practice where feasible. The purpose is to reduce overcrowding and interference problems. The corridor width for the San Pedro Riparian National Conservation Area was restricted to a 660 foot width because of the environmentally sensitive riparian area.

The proposed corridors currently have major existing right-of-way facilities. Section 503 of the Federal Land Policy and Management Act of 1976 states that "...existing corridors may be designated without further review." Designation of these areas as corridors would also support the Western Utilities Groups' corridor recommendation study.

Any future right-of-way grants within these proposed corridors will depend on case-by-case environmental assessments.

Because of scattered public land patterns and avoidance areas within portions of the Safford District, the usefulness of corridor designations in some areas is limited. Although Resource Management Plan Map 27 depicts the proposed corridors as crossing public, private and state lands, we only have jurisdiction over the public lands. Any future corridor user/applicant will need to work with other landowners to secure the necessary easements where the proposed corridor would cross their lands.

Response 162-24

BLM is required to inquire and conduct on-the-ground examinations for evidence of contamination and presence of hazardous materials in conjunction with other required inspections on all properties to be acquired. If the presence of hazardous materials is suspected, the case will immediately be referred to the State Director for further investigation and guidance. All acquisitions require a statement from the land owner that the non-federal lands are free of hazardous materials.

Response 162-25

Because they involve regrading existing road surfaces and removing obstructions, the proposed road reconstruction projects are not expected to cause significant impacts. Therefore, they were not discussed.

Response 162-26

Rehabilitation measures for eroded areas where roads will be closed will be determined at the time of closure. Although not at a level appropriate for Resource Management Plan consideration, these measures will range from simply road closings and allowing natural revegetation to occur, to ripping and reseeding roadbeds.

Response 162-27

Data indicates that a limited designation will provide adequate protection to riparian areas. We recognize enforcing restrictions are a problem given the extensive area we manage. However, the problem still exists whether enforcing a limited or closed designation.

Response 162-28

The Resource Management Plan calls for designating the Hot Well Dunes area as a Special Recreation Management Area. A Recreation Area Management Plan will then be prepared before development as an open off-road vehicle use area. This plan will include an inventory of vegetation and wildlife species, as well as a plan for monitoring the effects on resources. The associated National Environmental Policy Act compliance documentation will determine impacts to air quality, water quality, soils, vegetation, wildlife, cultural and paleontological resources. Mitigation measures will be identified and implemented to reduce the impacts.

Response 162-29

Data indicates these impacts are minimal with no significant adverse effects to these resources.

Response 162-30

See General Response 5. Salable minerals such as sand and gravel are discretionary actions with BLM and require case by case evaluations and National Environmental Policy Act compliance documentation. (See General Response 6.)

Response 162-31

See General Response 5. Requirement of an approved mining plan under 43 CFR 3809 regulations would provide adequate protection. (See Response 162-30.)

Response 162-32

Cumulative impacts are discussed in the Environmental Consequences section of the Final Environmental Impact Statement. Future minerals actions are either discretionary or require a mining plan or mining notice (43 CFR 3809) developed for a particular action. Environmental assessments will be completed and mitigations identified for each mining plan to address the effects of a particular action. (See General Response 5.)

Response 162-33

Stipulations are developed for mining activities in accordance with the mining laws and regulations. The stipulations are specific to each mining plan.

Response 162-34

A section has been included in Chapter 4 Environmental Consequences to address this issue.

Response 162-35

The Environmental Protection Agency will be included in the list of agencies to be notified when these activity level documents are developed.

Response 163-l

Decisions made in the San Pedro River Riparian Management Plan have been incorporated by reference into this document and are not subject to further review.

Response 163-2

Reconstruction of any roads will be subject to completion of National Environmental Policy Act compliance documents. (See General Response 6.)

Response 163-3

See Response 156-l 9.

Response 163-4

See Response 156-l 9.

Response 163-5

The prescription for management of the Desert Grasslands now includes the exclusion of livestock grazing.

Response 163-6

Preparation of an existing roads and trails map will be part of the District Transportation Plan being developed. It will not be available for distribution with this final Resource Management Plan/Environmental Impact Statement.

Response 163-7

BLM will work to accomplish the actions you have identified as rapidly as possible because they are basic to any management plan. The actions, through Item 5, described in the draft Resource Management Plan/ Environmental Impact Statement are sequentially presented. Results achieved through implementation of these actions are often a slow process in the desert environment.

Response 163-8

We have received a number of recommendations supporting this proposal and have added them to our proposed acquisitions. Refer to Map 27 for locations of proposed land acquisition areas.

Response 163-9

Seeding is not planned in vegetation treatment areas. If seeding is done, native species would be utilized, consistent with Executive Order 11987 which prohibits release of most exotic species.

Response 163-10

A listing of sensitive species will not be included in the appendix due to its length and recent taxonomic changes. The Arizona Natural Heritage Program maintains a list of sensitive species in the state.

Response 163-I 1

Detailed monitoring plans will be included in the Implementation Plan and in the activity plans as they are developed.

Response 164-I

The lack of good access to Turtle Mountain has been and continues to be a hindrance to managing of the allotment. A road proposal could be evaluated in the District Transportation Plan and considered after completion of site-specific National Environmental Policy Act compliance documents.

Response 165-I

The Area of Critical Environmental Concern boundary does include this portion of Turkey Creek. There have been some changes to the prescription in this Resource Management Plan/Environmental Impact Statement. (Also see Response 156-I 9.)

Response 165-2

Equestrian use of the tablelands has been and will continue to be an acceptable use of the area. Trails, corrals and other facilities will be addressed later in a more specific activity plan.

Response 166-I

Livestock grazing issues were addressed in the Upper Gila-San Simon and Eastern Arizona Grazing Environmental Impact Statements. Grazing is not an issue in this document. (See General Response 2.)

Response 166-2

Areas of Critical Environmental Concerns are valid multiple-use management designations. Their identification and designation is given priority in the Federal Land Policy and Management Act of 1976 (Sec. 201 (a)).

Response 166-3.

See Response 11 I-23.

Response 166-4

Resource monitoring will be a function of the activity plans which will implement many of the decisions of the Resource Management Plan. Soils inventories have been completed for much of the District as well as plant community inventories using *Brown, Lowe and Pase*. Habitat Management Plans have been developed, but are scheduled for revision to conform to more natural boundaries. The Habitat Management Plans include monitoring activities. The Allotment Management Plans developed for the livestock grazing program also stipulate monitoring.

Response 166-5

BLM is responsible for managing wildlife habitat. Wildlife populations and their management are the responsibilities of the Arizona Game and Fish Department. BLM provides input into the Arizona Game and Fish Department process to determine population levels.

BLM has not relinquished authority to manage forage resources on the Safford District. Arizona Game and Fish Department Strategic Plans and BLM Allotment Management Plans are given consideration in the planning process. Allocation of the forage resource is the result of decisions made through various planning alternatives.

Multiple use implies competing resources cannot be maximized on the same acre at the same time. The Bureau's responsibility is to ensure that a proper balance in the allocation of the forage resource is accomplished so that the basic resource, the vegetation, is not sacrificed.

Response 166-6

Appendix 6, now Appendix 4, discusses various wildlife habitat types for priority species. Vegetation in the draft Resource Management Plan/Environmental Impact Statement, (P.144) refers to the riparian type vegetation as important to livestock.

Response 166-7

No reference to the effects of grazing on desert tortoise is given in Appendix 4.

Response 166-8

Bighorn sheep were first observed in the Gila Box by a member of Coronado's expedition in 1540. In 1825, an early explorer, James Ohio Pattie noted "multitudes of mountain sheep" in the same area. The reoccurence of sheep in the area was reported in 1979 by Kenyon Udall, an area rancher. The rapid increase in numbers since then indicates the livestock grazing practices were compatible with the bighorn habitat needs.

Response 166-9

Wildlife populations are usually regulated by climatic factors such as rainfall. Occasionally density-dependent factors like disease become important. Documented examples of predators limiting prey populations exist but are special cases and should not form the basis for wildlife management policy. There are provisions within agreements between Arizona Game and Fish Department, BLM and Arizona Plant Health Inspection Service that could allow predator control to protect mule deer, but they have never been used in the Safford District. Deer numbers appear to closely follow the rainfall amounts consistent with Arizona Game and Fish Department research results.

Response 166-10

Wildlife populations are the responsibility of the Arizona Game and Fish Department. The BLM responsibility and role is to ensure adequate habitat to meet the needs of all wildlife species.

Response 167-I

BLM is currently taking action to open access to the public lands at this location.

Response 168-I

Livestock grazing is one of the recognized multiple uses of public land listed in the Taylor Grazing Act, and the Federal Land Policy and Management Act of 1976. Regulation of grazing fees are not within the scope of this document.

Response 169-I

See Response 5-1.

Response 170-I

The lands you describe are included in Alternative B. The BLM planning process and the National Environmental Policy Act enable the decisionmaker to select from any of the alternatives when making a decision. The Preferred Alternative of the draft document is an option, not a decision and while it usually represents a middle ground of land use options, the Proposed Resource Management Plan may contain portions from any of the alternatives evaluated.

Response 171-I

Right-of-way avoidance does not mean exclusion. The approval of an application for a second pipeline is subject to the prior completion of National Environmental Policy Act compliance documents. (See General Response 6.)

Response 171-2

The proposed Bowie Mountain Scenic Area of Critical Environmental Concern will be designated as an avoidance area. This will minimize or eliminate conflicts with sensitive areas, but will not necessarily prohibit authorizations of rights-of-way. The text of the Resource Management Plan has been changed accordingly.

Response 171-3

Your comments are noted.

Response 172-I

The 1988 Aravaipa Canyon Wilderness Management Plan is included in the list of references (draft Resource Management Plan/Environmental Impact Statement, p. 285) and is referred to other times in the text.

Response 172-2

The Muleshoe Ranch Area of Critical Environmental Concern boundary has been revised.

Response 172-3

See General Response 5.

Response 172-4

Vehicle use in Turkey Creek has not significantly affected the resources in the riparian area. The potential for impacts to the area will be addressed in a site-specific activity plan through the development of National Environmental Policy Act compliance documents (See General Response 6). Significant increases in visitor use or indiscriminant activity are not anticipated. The nature of the terrain in 95 percent of the area curtails off-road travel. Rebuilding of Ditmars Road has been deleted from Alternative A.

Response 172-5

Removal of exotic fish from streams to protect endangered native fish is an activity-level action of habitat maintenance and improvement. Actions identified in the wildlife portion of the Resource Management Plan would support this potential activity.

Response 172-6

A basic assumption in the analysis of anticipated impacts (including increased demand for recreation) is that "Funding and personnel would be available to fully implement any alternative" (draft Resource Management Plan/Environmental Impact Statement, p. 159).

Response 172-7

Erosion was addressed districtwide in the Management Situation Analysis developed as part of the planning process. Small areas may have erosion problems and will be dealt with in specific activity plans. The areas needing the most attention are noted in the Resource Management Plan.

Response 172-8

The Aravaipa Canyon Wilderness Management Plan is included in the Gila Resource Area Management Situation Analysis, which is incorporated into this Resource Management Plan/Environmental Impact Statement.

Response 172-9

Existing cooperative agreements are maintained in the District Office and are can be reviewed at the District Office. Listing these agreements without including the contents would be of limited value. In addition, the list would need continual revisions as new agreements are developed and others expire.

Response 172-I 0

An implementation plan with priorities will be prepared following issuance of the Record of Decision for the Resource Management Plan. Until the specific Resource Management Plan has been selected, we cannot be certain of specific Resource Management Plan actions.

Response 172-I 1

See Response 156-5.

Response 172-I 2

If soil erosion problem areas are noted during routine field work or through other monitoring activities, they will be addressed.

Response 172-I 3

The roads identified in the Resource Management Plan are necessary for public and administrative access. The District Transportation Plan involves a complete road inventory, road classification, road numbering and identification, and a final determination of need. A final District Transportation Plan is not necessary to identify individual road needs.

Response 172-14

The proposed Area of Critical Environmental Concern management prescription will be incorporated into the Wilderness Management Plan to the extent that the prescriptions are consistent with the Wilderness Act.

Response 172-I 5

An action item has been added to the Riparian section in Chapter 2, Management Guidance Common to All Alternatives.

Response 172-I 6

There is no Aravaipa Canyon Watershed Area of Critical Environmental Concern in the Preferred Alternative of the Resource Management Plan. Your point is well taken with respect to Alternative B in which the Aravaipa Canyon Watershed Area of Critical Environmental Concern did not provide for right-of-way avoidance. The topography of this Area of Critical Environmental Concern as well as others in the vicinity precludes most right-of-way needs. Alternative routes are more efficient and cost effective. We have included this prescription in the alternative.

Response 172-17

The proposed Special Recreation Management Area boundary includes Turkey Creek.

Response 172-18

This site has been subjected to two unauthorized releases of native and exotic fishes. Appropriate Fish and Wildlife Service Section 7 consultation has already been initiated to resolve the problems at Watson Wash because of the seriousness of the situation.

Response 172-I 9

See Response 162-31.

Response 172-20

See Response 100-33.

Response 172-21

See Response 100-39.

Response 172-22

These species have been identified in Table 2-3.

Response 172-23

BLM has identified the Muleshoe pipeline road for access to that particular area for administrative purposes.

Response 172-24

All actions of this nature would be subject to National Environmental Policy Act compliance procedures. (See General Response 6.)

Response 172-25

See Response 100-43. *Lilaeopsis shaffneriana* var. *recurva* has not been documented as occurring on public lands within the District.

Response 172-26

The referenced discussion is from the wilderness suitability report. With the passage of the Arizona Desert Wilderness Act of 1990, references to the suitability report have been deleted from this Final Environmental Impact Statement.

Response 172-27

The authority for designation of Wild and Scenic Rivers hasbeenchanged.

Response 172-28

See Responses 156-5 and 172-5.

Response 173-I

The discussion of management objectives for Priority Species/Habitats has been changed to reflect the management goals of the current strategic plan.

Response 173-2

Those lands in the lower San Pedro River corridor that possess significant riparian wildlife potential have been identified in this Safford District Resource Management Plan/Final Environmental Impact Statement.

Response 174-I

See Response 167-l. If this problem is not resolved before printing of this document, this area will be added to the list for acquisition of public access.

Response 174-2

Changes have been made to reflect these dates.

Response 174-3

The Dry Spring Area of Critical Environmental Concern has been included as part of the Needles Eye Wilderness Area through the Arizona Desert Wilderness Act.

Response 1744

See Response 174-3. Appropriate Area of Critical Environmental Concern prescriptions will be carried forward to the Wilderness Management Plan, but dual status will not be sought.

Response 174-5

The lands you reference are identified in Alternative B and are now also part of the Preferred Alternative. The original boundary described in the draft was based on an existing fenceline.

Response 174-6

When Allotment Management Plans are developed, wildlife habitat input is obtained and incorporated into the plan, regardless of the status of species or habitats within the allotment.

Response 174-7

Corrections have been made to text.

Response 174-8

See Response 173-2.

Response 174-9

These lands have been identified for acquisition. However, they are low in the District's acquisition priorities because of limited access caused by land ownership patterns. In addition, lands with riparian values and Threatened and Endangered species have higher priories for acquisition. Access acquisition is identified in Appendix 1.