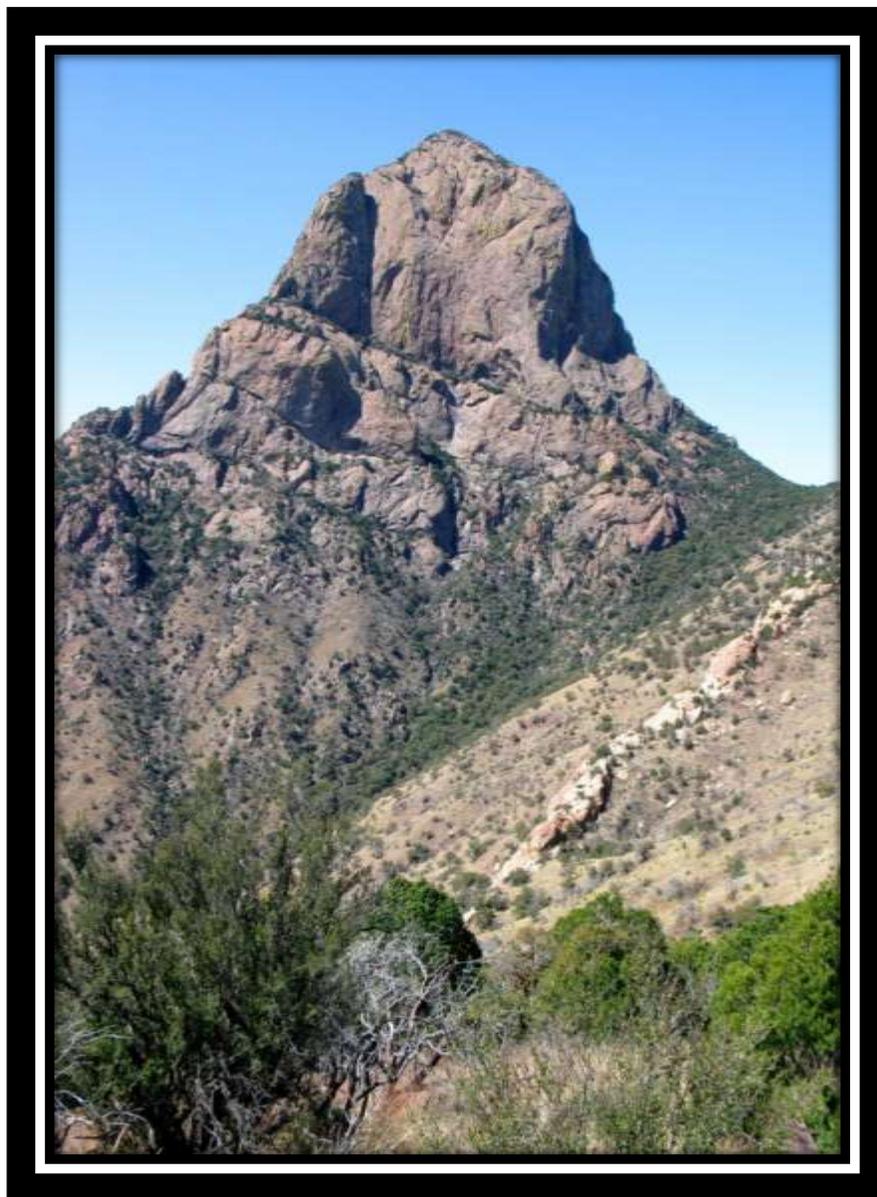


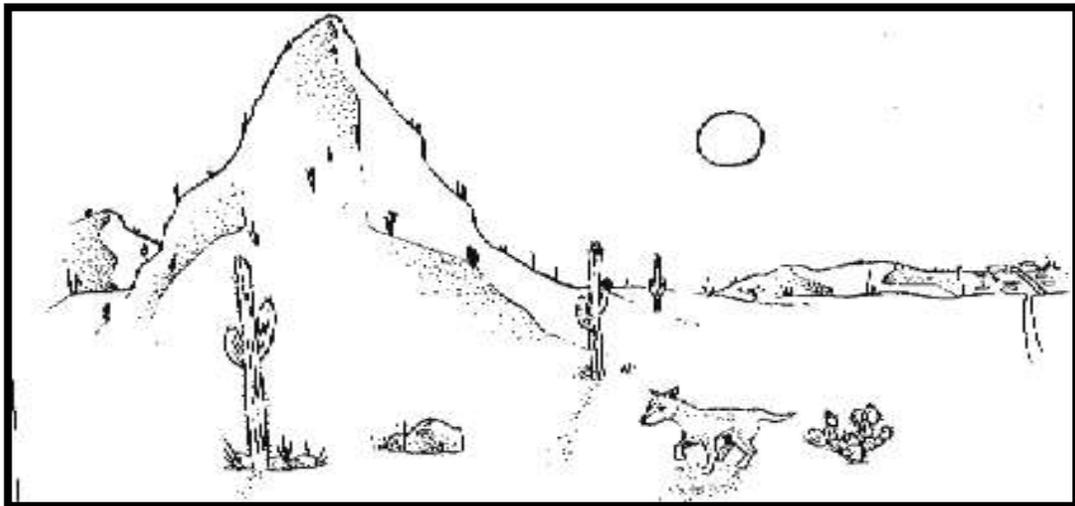
# **Baboquivari Peak Wilderness and Coyote Mountains Wilderness Wilderness Management Plan Environmental Assessment and Decision Record**



**October 2012**

Arizona Gila District Tucson Field Office





Drawing by: Carlos Ponce

The Bureau of Land Management (BLM) is responsible for the balanced management of the public lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield, a combination of uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources. These resources include recreation, range, timber, minerals, watershed, fish and wildlife, wilderness and natural, scenic, scientific and cultural values.

**Cover Photo:** A view of Baboquivari Peak Wilderness. All photographs in this document were taken within the Baboquivari Peak Wilderness and Coyote Mountains Wilderness.

**Final  
Baboquivari Peak Wilderness and  
Coyote Mountains Wilderness  
Wilderness Management Plan,  
Environmental Assessment,  
and Decision Record**

U.S. Department of the Interior  
Bureau of Land Management

Pima County, Arizona  
Environmental Assessment No. AZ-420-2008-047  
October 2012



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Tucson Field Office  
3201 East Universal Way  
Tucson, Arizona 85756  
[www.blm.gov/az/](http://www.blm.gov/az/)

In Reply Refer To:  
6340 (G020)

October 31, 2012

Dear Reader:

The Bureau of Land Management (BLM), Tucson Field Office, has completed the Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan. Designated by the Arizona Desert Wilderness Act of 1990, the Baboquivari Peak Wilderness and Coyote Mountains Wilderness areas total 7,145 acres and are located approximately 40 miles southwest of metropolitan Tucson in Pima County, Arizona.

The plan provides management objectives and actions for protecting and enhancing wilderness resources during the next 10 years. It also addresses the types and levels of uses to be allowed as intended by Congress. A schedule for implementing these management actions and evaluating their effectiveness is included in the plan. An Environmental Assessment (EA) has also been prepared to evaluate the environmental effects of the management actions proposed in the plan. The BLM anticipates no significant impact will occur as a result of implementing the plan and has prepared a Finding of No Significant Impact (FONSI) as part of the environmental documentation.

If you would prefer a paper copy of the draft plan and environmental documents, you may request one by mail to the above address, by e-mail to [jmahoney@blm.gov](mailto:jmahoney@blm.gov), or by telephone from Jim Mahoney at 520-439-6400.

Thank you for your interest in public land management.

Sincerely,

/s/ Brian B. Bellew

Brian Bellew  
Tucson Field Manager

**FINDING OF NO SIGNIFICANT IMPACT**

**and**

**DECISION RECORD**

**Tucson Field Office**

**Baboquivari Peak Wilderness and Coyote Mountains Wilderness**

**Wilderness Management Plan**

**Environmental Assessment No. AZ-420-2008-047**

Finding of No Significant Impact:

Based on the analysis of potential environmental impacts contained in the attached environmental assessment, I have determined that impacts are not expected to be significant and an environmental impact statement is not required.



Field Manager, Tucson Field Office

10/31/12.

Date

Decision:

My decision is to approve the Baboquivari Peak Wilderness and Coyote Mountains Wilderness – Wilderness Management Plan as described in the Proposed Action (Wilderness Management). This plan will establish management direction for both the Baboquivari Peak Wilderness and Coyote Mountains Wilderness for approximately the next ten years.

Rational for Decision:

The proposed action(s) in this wilderness management plan promotes the enhancement and maintenance of naturalness, solitude, and primitive recreation, while also managing other land uses and activities provided for by wilderness legislation. Naturalness, solitude and primitive recreation would be maintained by requiring the use of the Minimum Requirements Decision Guide for all on-the-ground actions.

Other Alternatives Considered:

A "No Action" alternative was considered. Since no unresolved conflicts involving alternate uses of resources or options offering meaningful differences in environmental impacts were identified during the course of this analysis, the range of the two alternatives was considered to be sufficient.

Stipulations:

None.

Appeals:

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4. If an appeal is taken, your notice of appeal must be filed in the Tucson Field Office, 3201 E. Universal Way, Tucson, AZ 85756, within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed is in error.

If you wish to file a petition (request) pursuant to regulation 43 CFR 2801.10 or 43 CFR 2881.10 for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with the Tucson Field Office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

Approved:

  
\_\_\_\_\_  
Field Manager, Tucson Field Office

10/31/12.  
\_\_\_\_\_  
Date

## Table of Contents

<b>Plan Summary</b> .....	6
<b>Part I – Introduction</b> .....	8
<b>Baboquivari Peak Wilderness Map</b> .....	10
<b>Coyote Mountains Wilderness Map</b> .....	11
<b>Part II – Wilderness Overview (General Setting)</b> .....	12
<b>Part III – General Management Situation (Affected Environment)</b> .....	16
<b>Table 1 – Grazing Allotments in Baboquivari Peak Wilderness and Coyote Mountains Wilderness</b> .....	17
<b>Table 2 – Grazing Allotment and Existing Range Improvement Summary</b> .....	18
<b>Baboquivari Peak Wilderness Grazing Allotments Map</b> .....	19
<b>Coyote Mountains Wilderness Grazing Allotments Map</b> .....	20
<b>Table 3 – Water Resources</b> .....	23
<b>Part IV – National Wilderness Management Goals</b> .....	28
<b>Part V – Issues</b> .....	29
<b>Part VI – Wilderness Management Strategy</b> .....	34
<b>Part VII – Wilderness Management (Proposed Action)</b> .....	35
<b>Part VIII – The “No Action” Alternative</b> .....	40
<b>Part IX – Environmental Consequences</b> .....	41
<b>Part X – Plan Evaluation</b> .....	45
<b>Part XI – Plan Implementation Schedule</b> .....	46
<b>Part XII – Consultation and Coordination</b> .....	47
<b>Glossary</b> .....	75
<b>Bibliography</b> .....	77
Appendix A – Planning and Scoping.....	78
Appendix B – Soil Survey.....	80
Appendix C – Special Status Species.....	82
Appendix D – U.S. Fish and Wildlife Service Biological Assessment Concurrence Letter for Draft Baboquivari Peak Wilderness and Coyote Mountains Wilderness - Wilderness Management Plan ...	83
Appendix E – Access .....	91
Appendix F – Fire Management Plan.....	92
Appendix G – Operating Guidance for Wildland Fire Suppression.....	95
Appendix H – Sky Islands.....	96
Appendix I – Minimum Requirements Decision Guide.....	97
Appendix J – Arizona Standards for Rangeland Health.....	98

Appendix K – Excerpts from Wilderness Management Final Rule.....	100
Appendix L – Cultural Resource Management Policy.....	101
Appendix M – Cultural Resources Inventory.....	106
Appendix N – Summary of Phoenix RMP Decisions.....	108



## Plan Summary

This plan covers the management of the Baboquivari Peak Wilderness and Coyote Mountains Wilderness, units of the BLM's National Landscape Conservation System (NLCS). Baboquivari Peak Wilderness (2,065 acres) and Coyote Mountains Wilderness (5,080 acres) are located in southern Arizona, approximately 45 miles southwest of metropolitan Tucson in Pima County. A mix of state and private properties, as well as Buenos Aires National Wildlife Refuge, borders the wilderness areas on the east and the Tohono O'odham Nation borders them on the west.

BLM policy requires the development of a management plan that will:

- Protect wilderness character and values,
- Provide for visitor use and enjoyment,
- Require the "Minimum Tool" to accomplish resource objectives inside wilderness, and
- Allow for special provisions as provided by legislation.

Four primary objectives of this wilderness management plan are established:

1. Preserve wilderness values by maintaining or enhancing natural conditions throughout the wilderness areas, including ecosystem structure and function, visual appearances and opportunities for solitude, and primitive and unconfined recreation.
2. Protecting and preserving natural features associated with cultural and spiritual values.
3. Providing for dispersed recreation use and wilderness preservation by maintaining appropriate trailhead signage, trail maintenance, and regular BLM, or other authorized, wilderness patrol.
4. Maintaining or improving ecological condition of plant communities, while allowing for a range of natural variability.

Specific actions to be implemented to achieve the objectives of this plan include:

- Ensuring the Minimum Requirements Decision Guide (MRDG) is used.
- Improving recognition of the wilderness boundaries.
- Eliminating vehicle intrusions in wilderness.
- Repairing, maintaining or removing wilderness allotment boundary, or pasture fences, and/or range improvements and developments, according to the guidance found in BLM Grazing Regulations 43 CFR 4310.
- Inventorying and evaluating abandoned mine features for human and ecological hazards as well as for habitat and historical/cultural values. Mitigate abandoned mine hazards utilizing the appropriate "minimum tool" while preserving to the extent possible, habitat and historical/cultural values and minimizing visual impacts.
- Inventorying and evaluating water resources.
- Coordinating with other agencies to achieve mutual healthy land goals, including wildlife, habitat and desired vegetation goals.
- Managing wildland fire.
- Securing year-round administrative wilderness access.
- Adequately monitoring health of the land and wilderness character.
- Monitoring for and removing unwanted exotic or noxious plant or animal species.
- Promoting wilderness use ethics.
- Minimizing human impacts in wilderness throughout the life of the plan.
- Assigning BLM staff or contract realty services to secure legal public access;
- Coordinating with appropriate land owners.
- Ensuring that the recommendation to pursue legal access to both wilderness areas is

included in a future Tucson Field Office Resource Management Plan.

- Coordinating with the Tohono O’odham Nation and other neighboring landowners and managers to assist in the development of educational and interpretive information. This effort will focus on access information and identifying desired visitor conduct while visiting the wilderness areas. These messages will address and integrate the concerns of the BLM, the Tohono O’odham Nation, Buenos Aires National Wildlife Refuge and interested public and adjacent private landowners. This information may be distributed or displayed at appropriate access points, printed in brochures, maps or made available electronically on the BLM’s and other partners’ web sites.
- Developing information emphasizing border issues and safety, rock climbing rules and etiquette, access and emphasize cultural resource protection.

## Part I – Introduction

### Background

The 1964 Wilderness Act describes wilderness as “an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain...A wilderness area is further defined as undeveloped federal land retaining primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which:

1. Generally appears to have been affected primarily by the forces of nature with the imprint of man’s work substantially unnoticeable,
2. Has outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other qualities,
3. Has at least five thousand acres of land, or is of sufficient size to make practicable its preservation and use in an unimpaired condition, and
4. May also contain ecological, geological, or other features of scientific, educational, scenic, or historical values.”

Wilderness character is described in terms of: undeveloped, untrammelled, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. You will find the following terms to describe wilderness character throughout this plan:

- Naturalness
- Opportunities for Solitude
- Opportunities for Primitive and Unconfined Recreation
- Unique Features

The term “naturalness” is used by the BLM to summarize and condense the words: undeveloped, untrammelled and natural.

“Unique Features” includes unique natural features or ecosystems, and unique spiritual and cultural values.

On November 28, 1990, Baboquivari Peak and Coyote Mountains were designated by Congress with the passage of the Arizona Desert Wilderness Act of

1990. Both wilderness areas are managed by the Department of the Interior, Bureau of Land Management, under the authority of the Wilderness Act of 1964. The two areas are among 47 designated wilderness areas within the National Wilderness Preservation System on BLM-administered lands in Arizona.

The Bureau’s Manual 8561 established that the agency will manage wilderness with the guidance of a wilderness plan. This environmental assessment analyzes the environmental and social impacts of the proposed Wilderness Management Plan (WMP) and one alternative, a “no-action” alternative.

### Purpose and Need

This plan will provide direction for managing the Baboquivari Peak and Coyote Mountains wilderness areas. Due to their physical proximity and similar “sky island” ecosystems, and similar management issues addressed, the two wilderness areas will be combined under this single wilderness management plan. Management direction will be guided by statutes, regulations, and other plans referenced in this document.

BLM policy requires the development of a management plan that protects wilderness character and values, and allows for special provisions as provided by legislation.

### Conformance with Land Use Plan

The proposed action and no-action alternative addressed in this environmental assessment are in conformance with the Final - Phoenix Resource Management Plan- December 1988. See Appendix N.

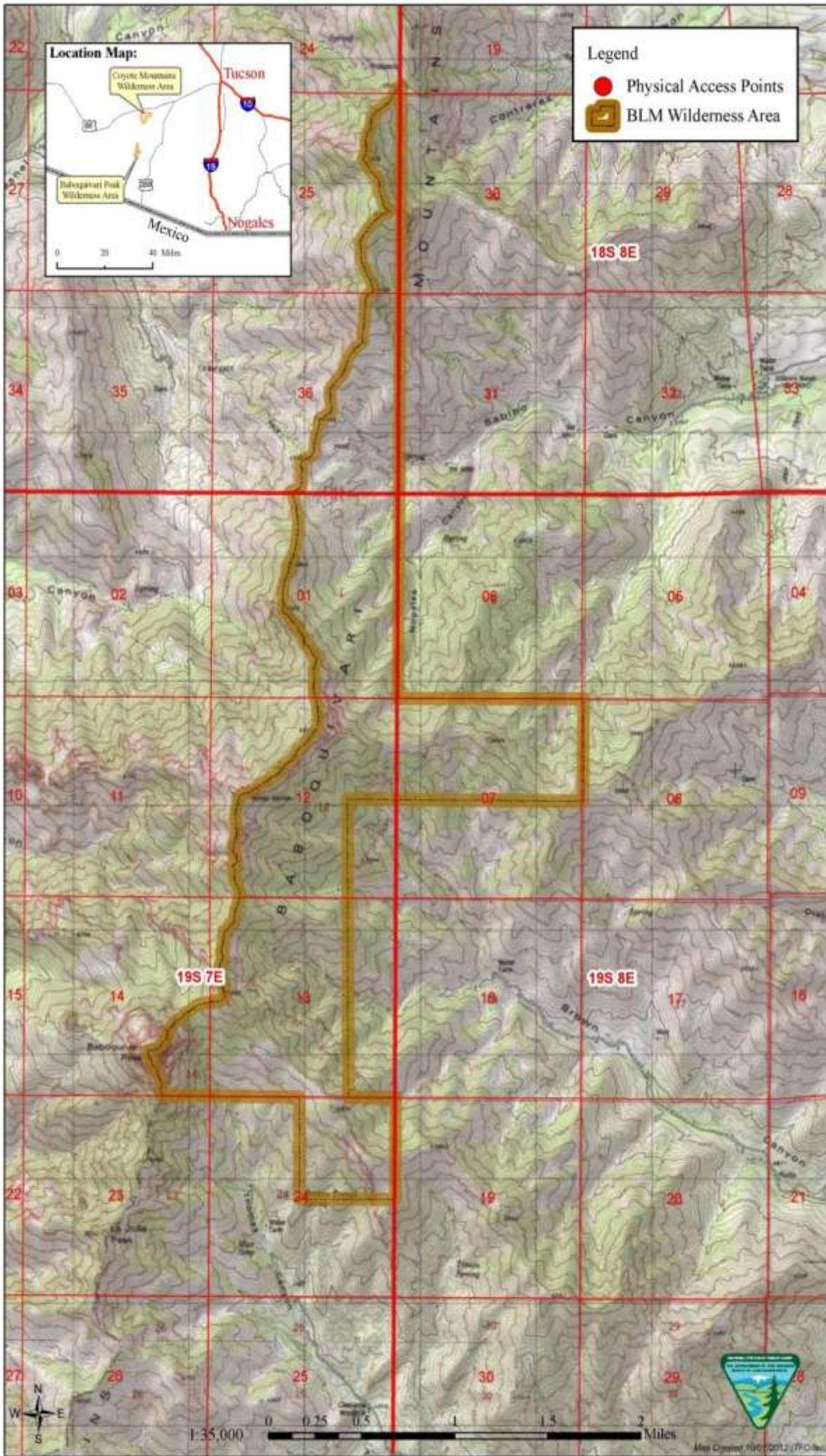
### Relationship to Statutes, Regulations or Other Plans

- The Wilderness Act of 1964 defined wilderness as “an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed as to preserve its natural conditions.” Under the Act, the BLM must manage wilderness within its jurisdiction to protect wilderness values.
- The Phoenix District Interim Guidance for Fire Suppression in Wilderness (1991) is superseded by the decisions contained within the Arizona Statewide Land Use Plan

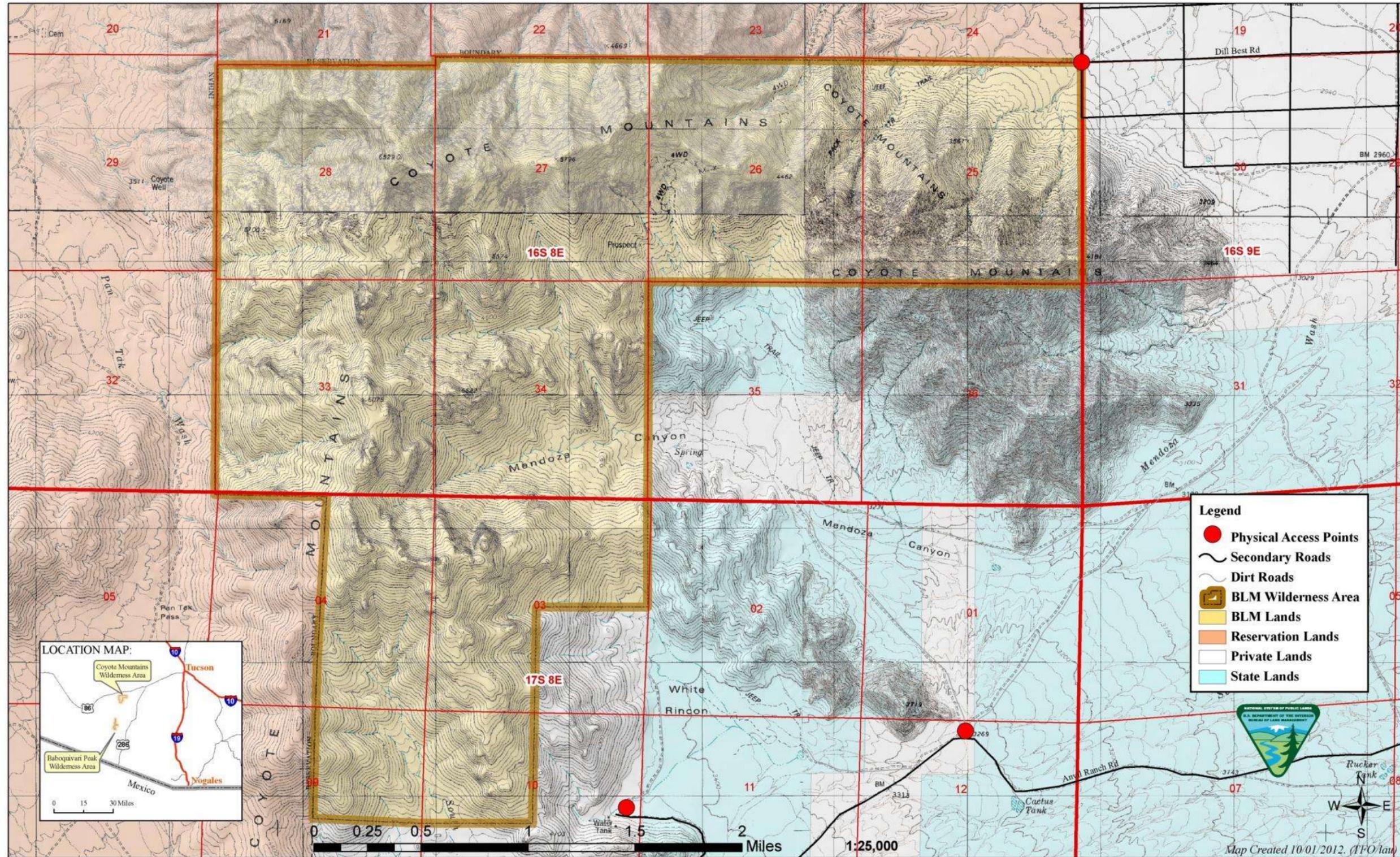
Amendment for Fire, Fuels and Air Quality Management (2004), and the Gila District Fire Management Plan (2010), and the implementation actions contained with this document.

- Actions from the following plans have been analyzed within this environmental assessment because the actions were proposed prior to wilderness designation:
  - Baboquivari-Silverbell Habitat Management Plan (1980).
  - Wilderness preservation became one of the BLM's multiple-use mandates with the signing of the Federal Land Policy and Management Act of 1976, (FLPMA). The Arizona Desert Wilderness Act of 1990 designated the Baboquivari Peak and Coyote Mountains wilderness areas.
  - Regulations governing wilderness management by the BLM are found at 43 CFR 6300 and BLM Manual 6340, "Management of Designated Wilderness Areas."
  - This environmental assessment complies with the National Environmental Policy Act of 1969 by providing the decision-maker with appropriate alternative for managing these wilderness areas and describing the environmental impacts of implementing each of the alternatives. A 45-day comment period is provided for by public review and input to this environmental assessment.
  - Where the environmental impacts of actions proposed in these alternatives have been assessed in previous documentation in land use or activity plans, the impacts have been summarized in this document.

# BABOQUIVARI PEAK WILDERNESS



# COYOTE MOUNTAINS WILDERNESS



## Part II – Wilderness Overview (General Setting)

### Ownership / Land Use / Boundaries

The BLM administers all surface and sub-surface land within the two wilderness areas. The Wilderness areas are administered under authority and provisions of:

- The Wilderness Act of 1964
- The Federal Land Policy and Management Act of 1976
- The Arizona Desert Wilderness Act of 1990

Forming the wilderness boundaries to the north, east, and south are blocks of state and private land. Some of these private parcels are currently inhabited. Forming the western boundaries of the two wilderness areas is the Tohono O’odham Nation.

Cadastral surveys demarcating the wilderness boundaries have not been accomplished.

### Topography and Climate

Both wilderness areas are in the Baboquivari Mountain Range. This range stretches continuously for 37 miles from the Sierra de Pozo Verde in northernmost Sonora, Mexico north to Southern Arizona through the Quinlan Mountains and to the Coyote Mountains. Because of the uplift in topography, the range receives more rain than the surrounding desert floor.

Weather data is collected from nearby Kitt Peak National Observatory which is situated on the Quinlan Mountains, about five miles southwest of the Coyote Mountains Wilderness and from the Anvil Ranch. Data can also be found on Western Regional Climate Center web pages.

Baboquivari Peak Wilderness is on the eastern slope of the Baboquivari Mountain Range. The west boundary of the wilderness area is the crest of the mountain range and is adjacent to the Tohono O’odham Nation. The wilderness area extends from Baboquivari Peak and the upper drainage of Thomas Canyon Wash north six miles to the upper reaches of Contreras Wash. Most of the terrain within the wilderness area is rugged with rocky slopes, ridges, and canyons. The summit of Baboquivari Peak (7,734 ft.) is the highest point; the lowest elevations are about 5,200 feet.

Exceptional scenic opportunities exist and can be experienced as one reaches a ridgeline, or the summit

of the Baboquivari Peak itself. On very rare clear days, the Gulf of California, 125 miles to the southeast, may be discerned through the low desert ranges across the Tohono O’odham Nation and Sonora, Mexico.

Coyote Mountains Wilderness covers most of the higher parts of the rugged Coyote Mountains, a detached extension of the Baboquivari Mountain Range. The elevation ranges from 3,100 feet to 6,529 feet at the summit of Coyote Peak.



Terrain within the wilderness consists of rugged and steep slopes, cliffs, narrow ridges, steep canyons and a number of impressive steep-sided granitic domes 1,000 feet high.

Physical access to higher elevations is limited due to steep topography and some areas can be reached only by using technical climbing aides.

### Air Quality

The air shed above the wilderness areas is to remain in compliance with EPA’s National Ambient Air Quality Standard and is generally of good quality in terms of opacity and particulate matter. Current data is available from the Pima County Department of Environmental Quality

### Vegetation

The two wilderness areas are recognized for unique plant assemblages and status. Several vegetation communities representing upper Sonoran Desert and Madrean oak woodland Life Zones are present in Coyote Mountain Wilderness lower elevations. Rising from the Altar Valley, palo verde-saguaro communities, dominated by mesquite, palo verde, ironwood, acacia, and several species of cacti are found. Climbing higher, the vegetation blends into an interior chaparral community dominated by

manzanita, mountain mahogany, buckthorn, shrub-liveoak and silktassel. Even higher elevations are dominated by a community of Arizona white oak and Mexican pinyon. Throughout the range are a mix of oak, pinyon, Arizona walnut and several chaparral species.

The slopes of Baboquivari Peak Wilderness support Sonoran Desert Scrub and Semi-Desert Grassland plant communities.

The two areas lie within what rangeland scientists categorize as the “Southeast Arizona Basin and Range Major Land Resource Area (MLRA-41).” Several Arizona Rangeland Ecological Site descriptions were developed and contain very detailed lists of vegetation, climate, and soil data. This information is available from the U.S. Department of Agriculture, Natural Resources Conservation Service, Tucson, Arizona. See Appendix C species summaries.

### **Wildlife**

Many species of wildlife inhabit the two wilderness areas that are representative of the diverse characteristics of the Sonoran Desert such as javelina, coyote, Coues whitetail deer, mule deer, mountain lion, bobcat, ringtail, coati and badger. Bird species include crested caracara, Harris’ hawk, black vulture, prairie falcon, golden eagle, peregrine falcon and scaled quail.

The Coyote Mountains are recognized as crucial white tail deer habitat as well as being bighorn sheep habitat. The last known verified sighting of a bighorn sheep was a ewe in 1979. See Appendix C for a partial list of wildlife species.

### **Special Status Species**

Baboquivari Peak Wilderness contains suitable habitat for two endangered wildlife species, the jaguar and lesser long-nosed bat. Suitable habitat also exists for the cactus ferruginous pygmy owl, which was previously listed as an endangered species. There have been several jaguar sightings within the last 15 years in the Baboquivari Mountains.

Endangered plant species include Kearney’s blue star.

Coyote Mountains Wilderness contains suitable habitat for Pima pineapple cactus, lesser long-nosed bat, jaguar and the cactus ferruginous pygmy owl.

See Appendix C for the Special Status Species lists.

### **Geology, Mineral Resources and Soils**

There are no active mining operations in the wilderness areas, nor are there any mining claims, mineral leases or permits to remove mineral materials on federal lands. There is no split estate. In split-estate situations, the surface rights and subsurface rights (such as the rights to develop minerals) for a piece of land are owned by different parties.

The Arizona Desert Wilderness Act of 1990 prohibits the filing of new mining claims on lands within these designated wilderness areas.

The USDA Natural Resources Conservation Service (NRCS) has completed a Level 3 soil survey covering the planning area. Although unpublished, this soil survey (Pima County, Eastern Part – 1993) contains information that can be used in Eastern Pima County. An overview is found in Appendix B.

The Baboquivari Mountains were uplifted in the mid-Tertiary during formation of the Basin and Range Physiographic Province. The wilderness is underlain by early Jurassic sedimentary and volcanic formations consisting of conglomerate, sandstone, siltstone, volcanic flows, and flow breccias. These formations are intruded by late Jurassic granite which forms Baboquivari Peak. The above formations are cut by numerous igneous dikes, which crisscross the entire wilderness.

The Coyote Mountains Wilderness is underlain by granitic plutons of various ages ranging from Jurassic to early Tertiary. The granitic rocks are cut by numerous pegmatite dikes. Metamorphic rocks form roof pendants in the granite in the north-central part of the wilderness. These rocks were originally Paleozoic carbonate and sandstone rocks that were recrystallized from the heat of the granite intrusion and metamorphosed into schist and quartzite. Copper and minor amounts of gold and silver were mined from the Bonanza Mine (Cavillo Camp) located in this area.

### **Visual Resources**

The Baboquivari Peak and Coyote Mountains wilderness areas are classified as Visual Resource Management (VRM) Class 1, in accordance with BLM policy. The objective for VRM Class 1 is to preserve the existing character of the landscape. This Class provides for natural ecological changes; however it does not preclude very limited management activity. The level and kind of changes to the characteristic landscape should be virtually unnoticeable and comply with the “Minimum Tool” matrix.

The characteristic landscapes within both wilderness areas are predominantly natural in appearance, with scattered manmade developments or modifications to the landscape.

### **Cultural Resources**

Both wilderness areas contain TCP values of religious and cultural importance to Indian tribes as described under section 101 (d) (6) (A) of the NHPA (National Historic Preservation Act). The following are some TCP characteristics that could apply:

- Places of ceremonial locations,
- Places associated with important events of tribal history, and
- Places associated with important people of the tribes past

A Baboquivari Peak Wilderness Cultural Survey was conducted in 2000 by Statistical Research, Incorporated. Prior to that time no formal, systematic surveys were performed in this wilderness. Three archaeological sites and six isolated occurrence historical-period features were found during the survey.

Cultural resource site types discovered on this survey include: lithic and ceramic scatters, a rock shelter, one rock art site, and a historical period fence marking the boundary between the BLM and the Tohono O’odham Nation. All recorded archaeological sites are recommended as potentially eligible for inclusion in the National Register of Historic Places. Statistical Research, Inc. inventoried approximately 1,176 acres, or 55% of the 2,135 acre Baboquivari Peak Wilderness area. Given the rugged character, the cultural resource inventory focused on areas where pedestrian survey could be performed efficiently and safely; therefore, survey focused on natural physiographic corridors of travel, such as drainage bottoms, ridge tops, and saddles. Prior to this assessment/survey, research in the surrounding Baboquivari Mountains and adjacent Altar Valley has been limited primarily because the area is underdeveloped and few improvements requiring archaeological clearance have been undertaken.

Additional surveys of the Baboquivari Peak Wilderness included a series of proprietary ethnographic interviews with eleven elders of the Tohono O’odham Nation who supplied both historical and ethnographic information about the wilderness area. Also, ethnographic interviews were conducted with three local ranching families who supplied historical information about the wilderness area. See Appendix M for the Baboquivari Peak Wilderness Cultural Resource Inventory Summary.

### **Native American Religious Concerns**

Anthropologists have long recognized the special importance of the Baboquivari Mountains to the Tohono O’odham, both in Tohono O’odham oral tradition and as the focus of a range of traditional activities, from the religious to the economic. The most important place within the range is, of course, Baboquivari Peak which has been called “the physical and spiritual center of the Tohono O’odham universe.”

Despite the universally acknowledged importance of Baboquivari Peak in Tohono O’odham culture and history, no comprehensive study of the subject has ever appeared. However, two conclusions are evident: (1) the Baboquivari Mountains as a whole have been an important part of Tohono O’odham life for centuries, and (2) the role of the Baboquivari range in modern Tohono O’odham life, although changed in many ways from earlier times, remains a prominent one.

### **Traditional Cultural Places**

The BLM is aware that the Baboquivari Peak and Coyote Mountains wilderness areas could contain areas of archaeological distinction, often referred to as Traditional Cultural Places (TCPs). Typically, this knowledge is shared with federal agency land managers during formal consultation efforts. Under Section 101 (d) (6) (A) of the National Historic Preservation Act, Traditional Cultural Places are defined as areas of religious and cultural importance to Indian Tribes. Listed below are a set of characteristics which define Traditional Cultural Places.

The following are some TCP characteristics that could apply:

- Places of ceremonial locations,
- Places associated with important events of tribal history, and
- Places associated with important people of the tribes past.

A portion of Coyote Mountains Wilderness was included in the Coyote Mountains Archaeological District Survey Project conducted by the Center for Desert Archaeology and Geo-Map, Inc. in 1989 and 1990. State, privately owned and federally managed public lands were included in this survey. The majority of the archaeological sites documented during this survey are located on private and state land. No other formal, systematic surveys have been conducted on federal land within the Coyote Mountains Wilderness.

Archaeological sites recorded on the 1989 and 1990 cultural resource surveys in the Coyote Mountains wilderness area represent Preclassic and early-to-late Classic Period Hohokam occupation dating from A.D. 200 through A.D. 1450. These sites include remnants of adobe and masonry walled structures surrounding compounds with central open space and several platform mounds. These sites are important because they have the potential to provide scientific research information about population demography, social structure and change, social and religious ritual, agricultural development, technology, architecture, economy and trade.

### **Recreation**

The majority of public inquiries received by Tucson Field Office regarding recreation are related to access to the boundaries and undeveloped portals in both areas. Currently, legal public access to the wilderness areas has not been obtained.

These wilderness areas offer visitors a high degree of solitude. As visitors ascend the slopes of either wilderness, views of the surrounding valleys and ranges become highly dramatic. Views of small ranches and small population areas also increase; however, the evidence of human habitation is minimal in the overall panorama.

### **Mineral Resources**

The Baboquivari Peak and Coyote Mountains wilderness areas were withdrawn from mineral entry upon wilderness designation. There are no mining claims and no mineral leases nor substantial mining disturbances known to exist in either of the wilderness areas.

Recreational prospecting has not been documented as a common activity within either wilderness.

## **Part III General Management Situation (Affected Environment)**

The General Management Situation summarizes how the BLM currently manages the two wilderness areas as allowed by law and also summarizes the general patterns of use.

### **Wilderness Character, Values & Unique Features**

**Naturalness and Undeveloped Values:** This section describes the presence or absence of developments and human imprints, and landscapes which have minimal evidence of modern human occupation or modification.

Baboquivari Peak is the highest point and most dramatic scenic feature in the Baboquivari Mountain Range. The peak rises to 7,730 feet and towers more than 1,000 feet above adjacent ridges. Baboquivari Peak's massive granite spire is a visible, notable, unique and sacred landmark in southern Arizona.

Other than 2.3 miles of boundary and pasture fencing, there are no other authorized range or wildlife developments in the Baboquivari Peak Wilderness. This wilderness is in a natural condition and is primarily affected by the forces of nature.

The Coyote Mountains are a detached extension of the Baboquivari Mountain Range. The steep sloped, mountains rise from the Altar Valley to a 6,529 feet summit, a nearly 3,500 feet change in elevation in approximately three miles. Composed of rugged granite and gneiss, the mountains have massive rock faces, rounded bluffs, rugged peaks and cliffs that are cut out of the large open Mendoza Canyon. When observed from the surrounding valley terrain, the Coyote Mountains dominate the landscape.

The lower elevations contain stands of saguaro cactus and other Sonoran desert plant species and the higher elevations contain chaparral plant communities.

This wilderness area is largely in a natural condition and is primarily affected by the forces of nature;

however, several human developments do exist, including:

- Range developments placed by the Hay Hook Grazing Allotment operators in the Coyote Mountains Wilderness. Since there has been no active use on the Hay Hook allotment for the past 37 years and little or no maintenance performed on the improvements, most of the range developments are in very poor condition or completely abandoned. There are remnants of 17 miles of stock trails of historic origin found in (T 16 S, R 8 E, Sec. 25, 26 and 27). The stock trails may require cultural assessment.
- Historic boundary fence between the Tohono O'odham Nation and the wilderness. There are approximately 15 miles of livestock pasture fence located within the Coyote Mountains wilderness.
- Historic and defunct Bonanza Mine, located near the eastern end of the Coyote Mountains wilderness. The general effect of the mine is unobtrusive and the disturbances are reverting back to nature. Inventory and assessment work needs to be completed to determine if the abandoned mine workings require remediation.
- In the Coyote Mountains Wilderness, a wildlife water development (T16S, R8E, Sec 33, SW $\frac{1}{4}$ , NE $\frac{1}{4}$ , SW $\frac{1}{4}$ ), was installed in the uplands in 1983 via helicopter. It was designed to blend entirely within its surroundings. This development consists of a three foot wide concrete dam, with 40 feet of two-inch pipe leading to a 2,000-gallon camouflaged fiberglass storage tank. It is difficult to find without a map and cannot be seen or located easily by the casual observer.

**Table 1. Grazing Allotments – Baboquivari Peak & Coyote Mountains Wilderness**

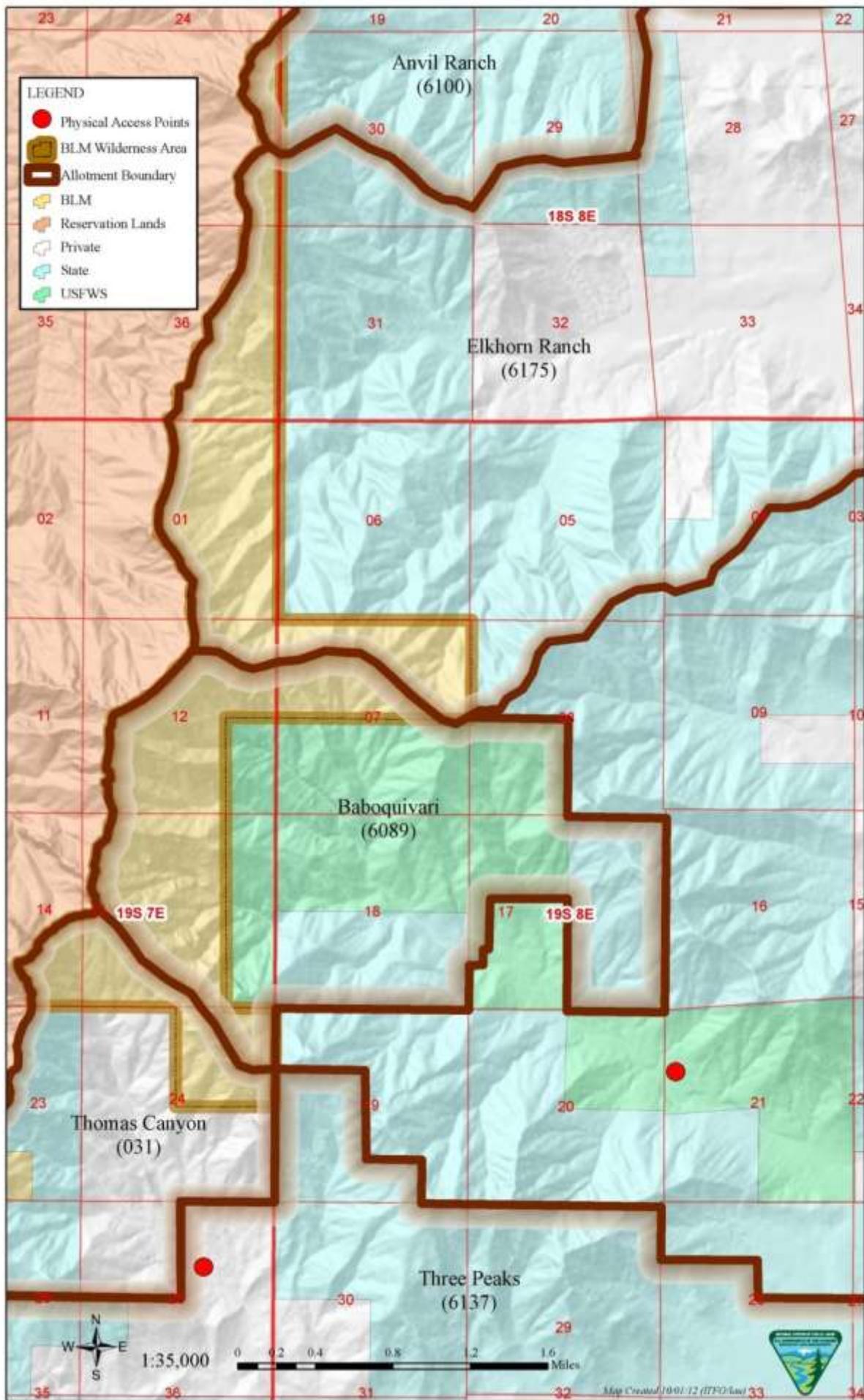
Allotment Number	Livestock Permitted	Animal Unit Months (AUMs)	Type of Livestock	Use Category	Acres of Allotment in Wilderness	Total Allotment Acres
<b>Thomas Canyon (6031)</b>	3	36	Cattle	Active	292	344
<b>Baboquivari (6089)</b>	20	240	Cattle	Lease Expired	840	840
<b>Elkhorn Ranch (6175)</b>	11	132	Horses	Active	863	863
<b>Anvil Ranch (6100)</b>	12	144	Cattle	Active	373	2,577
<b>Hay Hook (6093)</b>	32	384	Cattle	Non-use	4,762	4,762
<b>TOTALS</b>	<b>78</b>	<b>936</b>			<b>7,130</b>	<b>9,386</b>



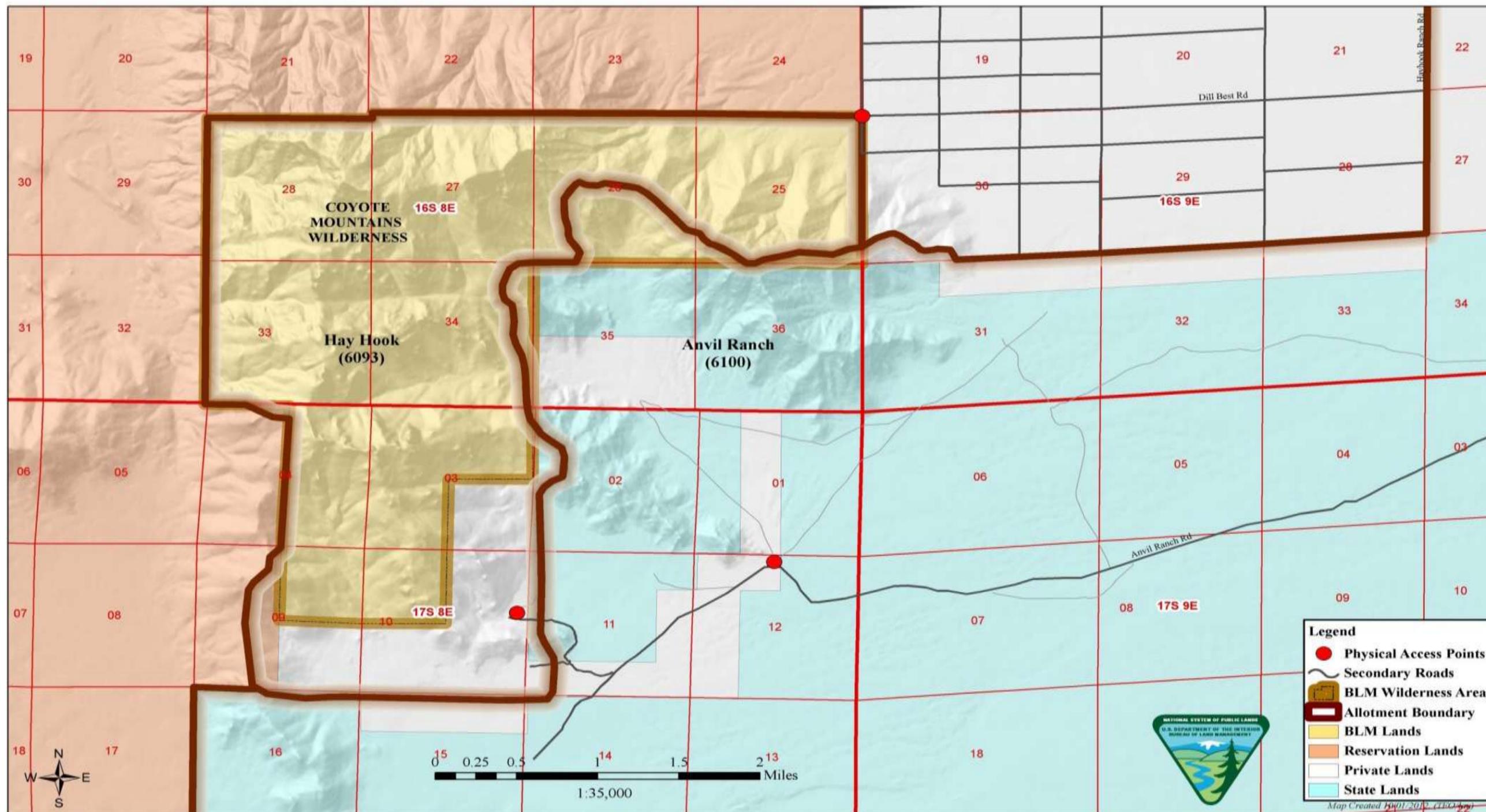
**Table 2. Grazing Allotment and Existing Range Improvement Summary**

<b>Allotment</b>	<b>Improvements/ Developments</b>	<b>Kind/Units</b>	<b>Location</b>
<b>Thomas Canyon (6031)</b>	None		East Side of Baboquivari Peak Wilderness
<b>Baboquivari (6089)</b>	None		East Side of Baboquivari Peak Wilderness
<b>Elkhorn (6175)</b>	1901 Perkins Boundary Fence	Tohono O’odham Nation Boundary Fence, 1.0 Mile	T20S, R8E, Sec 7 T20S, R7E, Sec 12
	Elkhorn – Tohono O’odham Boundary Fence	Tohono O’odham Boundary Fence, 1.3 Miles	T19S, R7E, Secs 25 and 36 T20S, R7E, Sec 1
<b>Anvil (6100)</b>	Anvil (Contreras Pasture) – Tohono O’odham Boundary Fence	Tohono O’odham Boundary Fence, 0.25 Mile	T19S, R7E, Sec 25
<b>Hay Hook (6093)</b>	North Boundary Fence (#2113)	TON Boundary Fence, 2.0 Miles	T16S, R8E Secs 25 and 26
	Stock Trails	17 Miles of three-foot-wide trails	T16S, R8E, Sec 34 T17S, R8E Secs 4,9 and10
	Wheelwright – Indian Fence	Subdivision & NE Boundary Fence, 1.0 Mile	T16S, R8E, Sec 25
	Calvia Boundary Fence	N Boundary with Anvil Ranch Fence, 1.0 Miles	T16S, R18E, Secs 25 and 26
	Mendoza Boundary Fence	W Boundary by up Mendoza Canyon Fence, 0.5 Mile	T16S, R8E, Sec 34
	SE Boundary Fence (All State & Private Land)	Boundary by HQ House Fence, 1.5 Miles	T17S, R8E, Secs 2 and11
	S Boundary Fence (All State & Private Land)	S Boundary with Anvil Ranch, 1.5 Miles	T17S, R7E, Sec 15 T17S, R8E, Sec 16
	SW Boundary Fence	Tohono O’odham Boundary Fence, 3.0 Miles	T17S, R7E, Sec 4 and 9 T16S, R7E, Sec 33
	Jenks Division Fence (#1119)	Makes the Indian Tank Pasture Fence, 1.0 Mile	T16S, R8E, Sec 26
	Calvia Pasture	Separates Calvia from Indian Pasture, Fence 0.5 Mile	T16S, R8E, Secs 26, 27
	Dome Gap Fence	Separates Dome from Mendoza Pasture	T16S, R8E, Sec 34
	Rosewood Spring (#2105)	Water Development	T16S, R18E, Sec 25, SWNW
	Pablo Spring (#2099)	Water Development	T16S, R8E, Sec 26, SWNW
	Papago Well		T16S, R8E, Sec 26, Lot 2
	Calvia Spring (#2104)	Water Development	T16S, R8E, Sec 26, SWSWSW
	Dome Springs	Water Development	T16S, R8E, Sec 34, SWNE
	Mendoza Water (#2108)	Water Development	T16S, R8E, Sec 34, SESW
	Mendoza Spring (#2109)	Water Development	T16S, R8E, Sec 34, SENESE
	Upper Mendoza Dam (#2110)	Water Development	T16S, R8E, Sec 34 E2E2
	Oak Spring (#2111)	Water Development	T16S, R8E, Sec 34 SESW
	Big Horn Spring	Water Development	T17S, R7E, Sec 4 NENE
Crack in Rock Spring (#2101)	Water Development	T16S, R7E, Sec 33 SWSE	
Indian Reservoir (#2112)	Water Development	T16S, R8E, Sec 25 NWNE	
Indian Road (#2116)	Former Vehicle Route	T16S, R8E, Sec 25, 26	

# BABOQUIVARI PEAK WILDERNESS GRAZING ALLOTMENTS



### COYOTE MOUNTAINS WILDERNESS GRAZING ALLOTMENTS



### **Opportunities for Solitude and Primitive and Unconfined Recreation:**

Defined as providing opportunities to experience natural sights and sounds, freedom, risk, the physical and emotional challenges of self-discovery and self-reliance.

Both of these areas are considered secluded and provide opportunities for solitude. They are fairly distant (30 - 40 miles) from urban areas, contain rugged terrain, and have no legal public access. These factors help maintain the wilderness character value of solitude in the areas.

The Coyote Mountain's rugged topography and vegetation provide opportunity for visitors to visually conceal themselves from one another. The several striking canyons, outcrops and granite faces serve to disperse use. The effect of Kitt Peak Observatory to the west may detract somewhat from one's feeling of isolation, although this only occurs along the western side of the wilderness.

Both wilderness areas contain outstanding opportunities for primitive and dispersed recreation including hiking, backpacking, sightseeing, wildlife viewing and rock climbing. In no small part due to the large and spectacular rock formations and deep canyons, both wilderness areas offer exceptional opportunities for visitors to experience untrammelled landscapes. "Untrammelled", refers to wilderness as essentially unhindered and free of modern human control and manipulation.

### **Unique Features:**

The Tohono O'odham Nation views Baboquivari Peak as sacred, the center of Mother Earth and the dwelling Place of I'itoi, the Creator. Most of Baboquivari Peak lies within the Tohono O'odham Nation boundary, and the remaining portion of the Peak lies within the BLM's Baboquivari Peak Wilderness boundary.

Both wilderness areas are in the Baboquivari Mountain Range, which is considered a "Sky Island" ecosystem. Sky Islands are a unique complex of about 40 mountain ranges in Arizona, New Mexico and northern portions of the Mexican states of Chihuahua and Sonora. These mountain ranges contain a wide variety of plant communities and animal species. See Appendix H for Sky Island information or link to: [USGS Sky Island Information](#)

### **Wilderness Management**

The Wilderness Act generally prohibits commercial enterprise, roads, motor vehicles, motorized equipment,

mechanical transport, structures or installations, and landing of aircraft. However, the Wilderness Act and many subsequent laws designating wilderness areas contain provisions authorizing activities that do not conform to these general prohibitions. Special provisions are described in this General Management Situation and the Wilderness Management Program in Part IV.

The BLM currently promotes several programs to enhance Wilderness management including: *Leave No Trace* land use ethics (LNT) and the Minimum Requirement Decision Guide (MRDG), also referred to as "Minimum Tool" analysis. General information, rules and information are available through BLM offices or on the following websites: [Leave No Trace Organization](#) and [Comprehensive Resource for Wilderness](#)

### **Access**

Currently there is no legal public access to the wilderness areas. The BLM advises visitors to obtain permission in advance from adjacent private land owners or the following agencies: Arizona State Land Department, Tohono O'odham Nation, AGFD Hunter Access program or Buenos Aires National Wildlife Refuge.

There are the three limited access points to Baboquivari Peak Wilderness. The first access point is through a private Nature Conservancy pedestrian easement located on the Humphrey Ranch in Thomas Canyon reached by a 10 mile unimproved dirt road in Altar Valley west off of Arizona Highway 286. The second access point is limited hiking access through Brown Canyon in the Buenos Aires National Wildlife Refuge. The third access point where visitors enter onto the BLM-managed portion of Baboquivari Peak is through the Tohono O'odham Nation, Baboquivari District, where a permit and fee is required for non-tribal members.

There is one 2,224 acre parcel of non-wilderness BLM land just north of Baboquivari Peak Wilderness that is very rugged and difficult to reach by foot and contains no suitable public access points.

A gate at the end of Thomas Canyon road is the primary physical foot access to the east side of Baboquivari Peak Wilderness. The parking area on the east side of Baboquivari Peak Wilderness, in Thomas Canyon is limited to two or three vehicles.

To access the wilderness, hikers walk on private land, next to a ranch house, through livestock corrals and proceed on a primitive social trail towards Baboquivari

Peak Wilderness boundary, travel time is about an hour just to the boundary.



With the exception of gaining access to Baboquivari Peak Wilderness through the Tohono O'odham Nation--where visitors seldom reach the wilderness boundary--it is estimated by the BLM that more than 50% of visitors do not obtain advance permission from land owners or managers to access either wilderness area.

Limited seasonal access to Coyote Mountains Wilderness is west of Highway 286 through the Anvil Ranch private land and Arizona State Trust Land, and is open on a two-year trial basis, beginning 2013, between March 1 and April 30. Seasonal access was granted through an agreement between the AGFD and the Anvil Ranch. Accessing this area outside of the allotted time period without expressed permission of the landowners is considered trespassing.

Another limited access point to the northeast corner of Coyote Mountains Wilderness can be attained by driving on the Hay Hook Road and driving to the western edge of the Hay Hook Ranch residential area.

The public has limited access to the east side of Coyote Mountains Wilderness, near Mendoza Canyon and the "domes." This two-mile hike traverses across Arizona State Trust Land and private property before reaching the wilderness boundary.

### Vegetation

The potential plant community is a diverse mixture of warm and cool season perennial grasses, ferns, forbs, succulents and shrubs. A tree canopy of 5-15% Mexican live-oak species occurs on the site, giving it a savannah appearance. Most perennial herbaceous species are well dispersed throughout the plant

community. A few species, however, occur only under the canopies of trees.

Periodic disturbance from wildland fire and grazing can result in replacement of mid-slope grasses, like sideoats grama, plains lovegrass, crinkleawn and green sprangletop, being replaced by annual grasses and forbs. Naturally occurring wildfires in June-August are an important factor to shaping this plant community. Fire-free intervals range from 10-20 years. In the absence of fire, this site gets shrubby with increases in species like turpentine bush, mimosas, bricklebrush, goldeneye, sotol and amole. Oak species on the site are very tolerant of fire. Well-developed covers of stones, cobbles, and gravel protect the soil from erosion after fire or heavy grazing. Trees per acre run from 5-30. *Agave palmeri* plants average 5-60 per acre. Without periodic disturbance like fire or grazing, grass species can become decadent and annuals like goldeneye can become dominant, especially in the years with wet winter-spring seasons.

Periodic drought can occur in this Major Land Resource Area and cause extensive grass mortality. Droughts in the early 30s and mid-1950s, 1975-76 and 1988-89, 1995-96 and 2002 resulted in the loss of much of the grass cover on this site. The site recovers rapidly, due to good covers of gravels and cobbles and the favorable climate prevailing in this common resource area.

### Water Resources

Baboquivari Peak and Coyote Mountains wilderness areas are located within the Santa Cruz River Watershed.

With the passage of the Arizona Desert Wilderness Act of 1990, Congress reserved a quantity of water for each wilderness area sufficient to fulfill the purposes of the Act, with a priority date established as the date of the Act's passage (November 28, 1990). The BLM shall acquire and perfect the water rights necessary to carry out public land management purposes and will take the steps necessary to protect its federal reserved water rights, including the filing of a claim for the quantification of these rights in any present or future appropriate stream adjudication in the courts of the State of Arizona in which the United States is or may be joined and which is conducted in accordance with the McCarran Amendment (43 U.S.C. 666).

The BLM is in the process of inventorying and quantifying the water sources within these wilderness areas. There is one well, one small reservoir, and eight undeveloped or developed springs/seeps within the wilderness boundaries. See Table 3 on the next page.

**Table 3. Water Resources**

Source Name	Location
Pablo Spring	T.16S., R.8E., Sec. 26 SENW
Unnamed wash	T.16S., R.8E., Sec. 25 NENW
Rosewood Spring	T.16S., R.8E., Sec. 25 SWNW
Mendoza Spring	T.16S., R.8E., Sec. 34 SESW
Indian Reservoir	T.16S., R.8E., Sec. 25 NWNE
Papago Well	T.16S., R.8E., Sec. 26 SWSW
Calvia Spring	T.16S., R.8E., Sec. 26 SWSW
Dome Spring	T.16S., R.8E., Sec. 34 SWNE
Oak Spring	T.16S., R.8E., Sec. 34 SESW
Crack-in-the-Rock Spring	T.16S., R.8E., Sec. 33 NENE
Upper Sabino Spring	T.18S., R.7E., Sec. 36 SESE

### Wildlife

These wilderness areas provides excellent habitat for Coues whitetail deer and javelina. Natural water occurs infrequently as springs or seeps. Water developments are very important to the larger mammals using the wilderness areas as well as numerous bird and small mammal species. *Agave palmeri* occurs scattered throughout areas of this site and is a primary food source for the endangered lesser long-nosed bat during its June-August flowering period. Natural fires are important for many species on this site to maintain a balance between trees, shrubs, grasses and forbs.

### Special-Status Species (Federally Listed or Proposed Threatened and Endangered Wildlife and Plants, State Listed, and BLM Sensitive)

A complete list of BLM Arizona’s Special Status Species that occur in the Baboquivari and Coyote wilderness areas is listed in Appendix C. Special status species include the following: (1) species currently listed or considered for listing as threatened and endangered by the USFWS, and (2) species listed as sensitive by the BLM.

### Cultural Resources

Given the fact that these areas are very rugged and remote, BLM-instituted land management projects and actions pertaining to the wilderness areas are expected to be minimal. The BLM complies with required regulations provided for under Section 106 of the National Historic Preservation Act. One cultural resource survey was conducted. Cultural sites within the wilderness areas are monitored by BLM staff on a regular basis. The BLM will continue to assess, record, consult and protect newly discovered archaeological sites, as well as maintain protection standards for previously recorded sites.

Previously recorded sites are managed under the BLM’s Cultural Resource Management Policy, see Appendix L.

The consultation efforts with the Tohono O’odham Nation have occurred and are ongoing regarding solicitation of information regarding the management of cultural resources within the Baboquivari Peak Wilderness.

### Recreation

These two wilderness areas currently receive moderate levels of dispersed primitive recreation, even though legal public access to the wilderness areas has not been achieved.

It is estimated that 60 hikers and rock climbers a month may access the areas in the cooler months of spring, fall and winter. Visitors travel by foot and occasionally horseback within the wilderness. Overnight stays are primarily associated with rock climbing. It is estimated that most group sizes are under 15 people, but some local hiking clubs are reported to hike in group sizes up to 50 people.

Baboquivari Peak is a popular technical rock climbing site. There are two main routes to access Baboquivari Peak, one from the eastside through the wilderness and the other from the west, entirely through the Tohono O’odham Nation. The eastern route to Baboquivari Peak begins in Thomas Canyon. There is The Nature Conservancy’s (private) pedestrian easement and trailhead at the end of Thomas Canyon road. The hike on a primitive trail to the wilderness boundary takes about an hour.

From the wilderness boundary, one can hike and climb to the top of the peak. Climbers follow routes on the south or east side of the peak, depending on the climber’s experience. These routes vary from a Class 4 to a Class 6 climb. The popular Forbes route is a Class 4 climb.

The view of the peak at close range along with hiking among a variety of oak trees and other sky island vegetation is considered among the most spectacular landscapes in the Southwest.



The BLM estimates that most people use the west route to visit or climb Baboquivari Peak. Visitors must obtain permission from the Tohono O’odham Nation Baboquivari District Office, located in Topawa to hike to Baboquivari Peak. Visitors who use this route often camp in the Tohono O’odham Nation’s Baboquivari District camping area at the beginning of the route. Any subsequent recreation activity from the end of this route usually involves little to no entry into the Wilderness. The BLM has no jurisdiction over this route.

Based on regional population growth estimates, use levels will increase over the next 20 years. Even with the increase in visitation, day use hiking and climbing are expected to remain the primary types of activities.

Coyote Mountains Wilderness is becoming increasingly popular with the technical rock climbing community. Several publications sold in outdoor gear stores describe exact routes and anchor and bolt locations. The AGFD partners with the King Anvil Ranch owners to allow limited access across State Trust Lands to Coyote Mountains Wilderness. The area is a popular destination for hunting in unit 36C. Visitor use has not been quantified, but the estimates are several hundred visitors a year.

### **Special Recreation Permits (SRPs)**

Although commercial enterprise is prohibited in wilderness areas, there are special provisions for some commercial services as found in the 1964 Wilderness Act:

“Commercial services may be performed within the wilderness areas designated by this Act to the extent

necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” Section 4(d)(6)

The BLM Manual 6340 also directs that commercial services may be performed within the wilderness to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the area rather than only to provide a desired activity in a wilderness setting. As such, permitting commercial services within wilderness is discretionary. Applications have been evaluated on a case-by-case basis.

The BLM has received very few SRP applications for either wilderness over the past 15 years. In 2002, the BLM received two applications to establish commercial guided rock climbing services. As a result of receiving these applications, the BLM consulted with the Tohono O’odham Nation regarding SRP applications for commercially guided rock climbing services in Baboquivari Peak Wilderness.

In the northern portion of Baboquivari Peak Wilderness, the Elkhorn Ranch holds a Special Recreation Permit (SRP) for commercial trail ride outfitting services. Less than one mile of primitive trail inside the wilderness boundary is used as part of the SRP plan. The group size is limited to no more than six people or six animals and is limited to day use.

Due to the complexity of social and spiritual issues related to Baboquivari Peak and the timeline for developing this wilderness management plan, the BLM has chosen to not accept applications for commercial SRPs for guided rock climbing services pending the completion of this plan.

There are no SRPs issued for use in the Coyote Mountains Wilderness because there have been none requested.

### **Livestock Grazing**

The BLM’s grazing regulations (43 CFR 4100) provide for implementation of Standards and Guidelines to achieve Rangeland Health on BLM-administered lands where livestock grazing is authorized. These Standards and Guidelines are intended to state the BLM’s policy and direction for public land users and for those responsible for managing the public lands and accountable for their condition

The Arizona Standards and Guidelines meet the requirements and intent of 43 Code of Federal Regulations, Subpart 4180 (Rangeland Health). See: [Arizona Standards and Guidelines](#)

The fundamentals of rangeland health provide the direction for developing resource objectives and selecting proper management actions. The rangeland program includes resource monitoring, conducting land health assessments and evaluations, use authorizations, allotment planning and administration, developing vegetation objectives, integrating weed management, and activity plan development in connection with land use planning.

Changes to the current grazing leases are made by issuing formal decisions proposing modifications to the existing grazing lessees. These decisions would be issued under the grazing program regulations (43 CFR 4100). Any changes in the acreage of public lands available for livestock grazing or in the availability of forage available for livestock use on a sustained yield basis must be made through amendments to the Resource Management Plan.

Livestock grazing is currently authorized on the public lands within the wilderness areas. See Table 1.



The public lands in the Anvil Ranch, Elkhorn Ranch, and Thomas Canyon allotments were assessed and were determined to be meeting the standards for Rangeland Health and the management was acceptable under the guidelines for grazing management. Each lease contains terms and conditions for proper use including mitigation measures to protect and recover threatened and endangered species.

The private and state lands adjacent to the two wilderness areas are used for livestock grazing. Forage for livestock grazing was allocated for livestock through the Eastern Arizona Grazing EIS and Rangeland Program Summary (September 1987) and the Phoenix Resource Management Plan - December 1988. The BLM coordinates the grazing management with grazing lessees, Altar Valley Conservation Alliance, Natural

Resources Conservation Service, Arizona State Land Department, University of Arizona Extension Service, AGFD, and U.S. Fish and Wildlife Service (USFWS), through the Coordinated Resource Management Planning Process. This group meets yearly under an interagency Memorandum of Understanding to identify and resolve resource issues. The lands in the Tohono O’odham Nation are either separated from the BLM lands by natural land features, or are separated by livestock fencing.

Baboquivari Peak Wilderness contains portions of three grazing allotments:

- Elkhorn Allotment #6175. An Allotment Management Plan (AMP) is in place for this allotment. The current active permitted grazing use is 132 AUMs which equates to 11 horses yearlong. Developments include about one mile of fence.
- Thomas Canyon Allotment #6031. The current active permitted grazing use is 36 AUMs which equates to three cattle yearlong. There are no developments.
- Baboquivari Allotment #6089. The allotment was permitted for 240 AUMs which equated to 20 cattle yearlong. However, in 1995, the grazing lease was terminated due to the allotment owner losing control of base property. Under the BLM grazing regulations, 43 CFR 4110.2-1, subpart E, after 90 days, the lease is considered terminated. There are no developments.

Coyote Mountains Wilderness contains portions of two grazing allotments:

- Hay Hook Allotment #6093. The current permitted grazing use is 384 AUMs which equates to 32 cattle yearlong. The allotment has been in nonuse since the early 1980s due to ranch economics and poor condition of the range improvements. The current grazing lessee, Pima County, acquired the base property--the Hay Hook Ranch and the BLM grazing lease was transferred to them in August of 2005. The BLM approved nonuse of the allotment, pending negotiations with Pima County regarding cancelling range improvements within the allotment.
- Anvil Allotment #6100. The current active permitted grazing use is 144 AUMs which

equates to 12 cattle yearlong. Only 373 acres of the total 2577 public acres of this allotment are in wilderness. There are 51 acres in Baboquivari Peak Wilderness and 322 acres in the Coyote Mountains Wilderness. A quarter mile of fence along the Tohono O'odham Nation boundary is located in this wilderness.

### **Wildland Fire Management**

Historically, the fire management strategy was to apply full suppression. In 2004, the Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management, and in 2010, the Gila District Fire Management Plans were approved. Currently, preference is given to suppression techniques that are least damaging to resources and the environment. When suppression actions are required, minimum impact suppression techniques, (MIST) and Interagency Standards for Fire Operation) would be applied and coordinated with Wilderness management objectives and guidelines.

The historical natural fire return frequency ranges from less than one to 35 years, with stand replacement severity at the lower elevations to 35-100+ years with mixed levels of severity.



Records show low fire frequencies over the past twenty years. Recently, fires were recorded in the Baboquivari Peak Wilderness. In 2002, the Center Fire burned approximately 180 acres, and in 2003 the Baboquivari Fire burned immediately adjacent to the Wilderness on Tohono O'odham Nation land. In July 2007, the Alhambra Fire burned the 2,224 acres of the BLM non-wilderness portion adjacent to both wilderness areas. In 2008, the Solano Fire burned 2,177 acres mostly outside of Baboquivari Peak and Coyote Mountains wilderness areas. In 2009, the Elkhorn Fire burned 1,921 acres, most of which occurred in the Baboquivari Peak

Wilderness. In 2012, the Montezuma Fire burned approximately 40 acres within the Baboquivari Peak Wilderness. With each fire, the management response was to apply full suppression strategies primarily due to hot and dry weather conditions and to reduce risks to rural communities.

The BLM continues to work with local ranchers, private landowners, USFWS, Tohono O'odham Nation, Natural Resources Conservation Service, Pima Natural Resources Conservation District, and the Altar Valley Alliance to implement appropriate management response fire management with the Arizona State Land Department.

### **Aircraft Overflights**

Although the areas generally provide outstanding opportunities for solitude, there are frequent sound disruptions of both military and non-military aircraft passing over and near the wilderness areas.

Through a Federal Aviation Administration (FAA) advisory, all non-military aircraft are requested to maintain an altitude of 2,000 feet above ground level or higher over the surface of federal wilderness areas. Surface is defined as the highest terrain within 2,000 feet laterally of the route of flight, or the uppermost rim of a canyon or valley. This altitude advisory does not apply to military aircraft operating within an established military training corridor. There is a military training route (VR-259 F-G 500) about six miles south of Baboquivari Peak Wilderness.

### **Approved Existing Motorized/Mechanical Uses**

Emergency response, some law enforcement and wildlife management activities, and other accepted uses are provided for in the Arizona Desert Wilderness Act of 1990. The use of aircraft by the AGFD is covered under a Memorandum of Understanding (MOU). The use of aircraft, motorized and mechanical equipment by the Department of Homeland Security, U.S. Customs and Border Protection (CBP) are covered under a March 2006 MOU.

### **Law Enforcement, Emergency Services and International Border Issues**

There has been a steady increase of illegal immigration, smuggling and international border law enforcement activity in the vicinity of both wilderness areas. Both wilderness areas are close to the U.S.-Mexico Border and are within a high intensity law enforcement corridor.

Border Customs and Drug Enforcement Agency agents

conduct undocumented immigration and smuggling and drug interdiction activities surrounding the two wilderness areas on a regular basis. These activities are governed by mutual agreement and outlined in an existing Memorandum of Understanding with the Department of Homeland Security (DHS) in response to increases in illegal border traffic in recent years, and the hazards that undocumented immigrants and other illegal traffickers face in crossing the mountains and deserts of Southern Arizona.

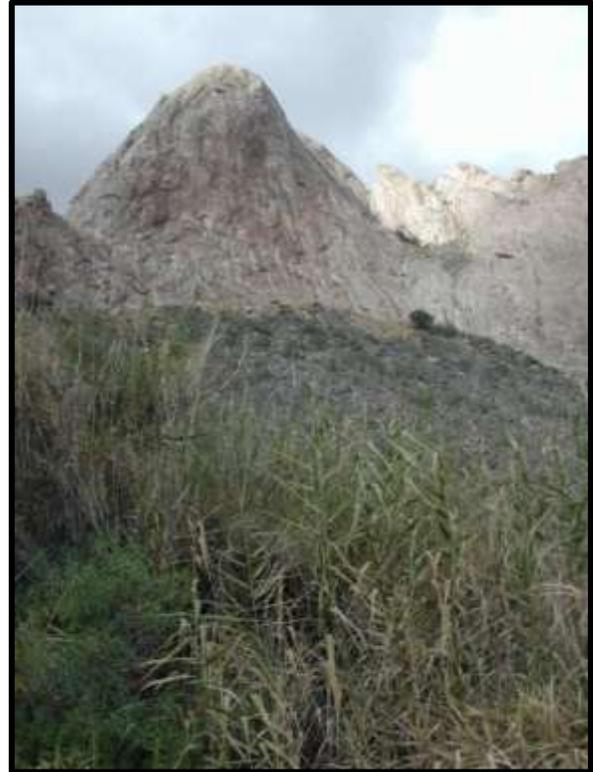
A coordination system is established between the BLM and the various federal, state and county law enforcement agencies to manage these complex border law enforcement conditions and activities.



## Part IV – National Wilderness Management Goals

Four standard management goals have been established by the BLM for its designated wilderness areas. The goals are as follows:

1. To provide for the long-term protection and preservation of the area's wilderness character under a principle of non-degradation. The area's natural condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historical value present will be managed so that they will remain unimpaired.
2. To manage the wilderness area for the use and enjoyment of visitors in a manner that will leave the area unimpaired for future use and enjoyment as wilderness. The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness and visitor use.
3. To manage the area using the minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Management will seek to preserve spontaneity of use and as much freedom from regulation as possible.
4. To manage nonconforming but accepted uses permitted by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area's wilderness character. Nonconforming uses are the exception rather than the rule; therefore, emphasis is placed on maintaining wilderness character.



### Interagency Strategic Plan (1995)

This plan contains similar goals as stated above; however, it is more specific in the Management of Social Values as an important topic. "Social values are a fundamental component of wilderness. We need to retain spiritual and psychological values, and guarantee opportunities for solitude and primitive recreation in areas retaining their primeval character and influence."

## Part V – Issues

The majority of issues and concerns remain the same as documented in the public planning meetings beginning in 2000. The public and BLM staff have not brought up any new or substantially different issues since that time, with the exception of increased Department of Homeland Security activities including the planned installation of communication and surveillance towers in the Altar Valley and Buenos Aires National Wildlife Refuge.

The comments and concerns generated during scoping meetings with the public and the BLM staff is synthesized and addressed under three major issue categories:

- Issues Addressed in this Plan
- Issues Solved Through Policy or Administrative Action
- Issues Beyond the Scope of this Plan

### Issues Addressed In This Plan

**Issue 1 – Preservation of the Wilderness Character of Naturalness:** Concerns were expressed about maintaining wilderness experiences, natural conditions and preventing overuse, managing fire, special status species and developing monitoring programs.

**Issue 2 – Preservation of the Wilderness Character of Solitude:** Concerns were expressed about maintaining wilderness experiences for solitude.

**Issue 3 – Preservation of the Wilderness Character of Primitive and Unconfined Recreation:** Concerns were expressed about establishing and maintaining access for recreation and other purposes, allowing for past and existing activities, guided activities, and emphasizing wilderness appropriate land use ethics.

**Issue 4 – Preservation of the Wilderness Character of Unique Features:** Concerns were expressed about maintaining the spiritual nature of Baboquivari Peak Wilderness, protecting cultural sites, providing for traditional uses, recognizing sacred beliefs and educating the public about these topics and working with the Tohono O’odham Nation to accomplish the goals of this plan.

### Issues Solved Through Policy or Administrative Action

**Recreation** – Concerns were expressed during scoping about preserving the wilderness experience while

allowing historic recreation uses such as climbing, hiking, hunting, including the use of hunting dogs. These methods and activities for primitive recreation are allowed in wilderness by law. Other concerns included permits, fees and visitor conduct.

Rock climbing may continue as outlined in BLM wilderness management regulations 43 CFR 6300 with restrictions on the use of motorized tools. The use of motorized equipment, including power drills, and mechanical transport is not allowed. Part V addresses decisions on commercial guided rock climbing on the BLM wilderness portion of Baboquivari Peak and within Coyote Mountains Wilderness. See Appendix K for the Wilderness Management Final Rule.

Hunting remains an allowable activity regulated by the AGFD in these two BLM wilderness areas. The Arizona Desert Wilderness Act states that “nothing...shall be construed as affecting the jurisdiction of responsibilities of the state of Arizona with respect to wildlife and fish on public lands.”

The use of hunting dogs is allowed as outlined under AGFD rules and regulations. Currently, there is a special provision pertaining to the use of hunting dogs in jaguar habitat.

**Special Recreation Permits, Commercial Outfitter and Guide Activities** – The Wilderness Act generally prohibits commercial activities, however, the Wilderness Act also provides that: “Commercial services may be performed . . . to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” These services include outfitter and guide activities. Regulations provide that an application to the BLM for a Special Recreation Permit may be considered. The issuance of a Special Recreation Permit is considered a discretionary action, and will be considered on a case-by-case basis. Part VII of this plan addresses decisions for Special Recreation Permits within these two wilderness areas.

**Recreation Use Fees or Permits** – While current BLM policy allows for an entry fee, the decision on whether to implement a fee is at the discretion of the BLM Field Manager based on identified criteria. The criteria for establishing an entry fee is not met for these wilderness areas. It is not feasible to implement a fee or permit system under current access conditions, even if visitation increases.

**Visitor conduct** – Rules of conduct will be enforced in accordance with 43 CFR 2920.1 and 8365. The public is allowed to visit areas within the National Wilderness Preservation System.

**Livestock Grazing** – Concerns were expressed about livestock grazing in the wilderness areas including allowing grazing to continue, and avoid overuse by livestock.

The Wilderness Act allows livestock grazing to continue where established prior to wilderness designation. Grazing is authorized in portions of these two wilderness areas, and can continue subject to regulation.

The BLM is required to follow Arizona Standards for Rangeland Health and Guidelines for Grazing Management to ensure appropriate grazing practices. Guidelines include conducting evaluations every time a lease is renewed (every ten years), or if determined a lease is not meeting standards through compliance inspections at least once every two years.

Formal decisions proposing modifications to the existing grazing leases would be issued under the grazing program regulations at 43 CFR 4100. Any changes in the acreage of public lands available for livestock grazing or in the availability of forage available for livestock use on a sustained yield basis must be made through amendments to the existing Resource Management Plan.

Removal of trespass livestock that enter from neighboring lands is covered under existing policy at 43 CFR 4000 subpart 4150.

**Law Enforcement, Emergency Services and International Border Issues** – Concerns were expressed about access for emergency situations and impacts associated with undocumented immigration and drug trafficking.

The BLM Manual 6340 and 43 CFR 6303 provides for emergency law enforcement access in the event of pursuit or to address emergency health and safety concerns.

Wilderness visitors will enter a “High Intensity Enforcement Area” while accessing Baboquivari Peak and Coyote Mountains wilderness areas.

A Memorandum of Understanding (MOU) among U.S. Department of Homeland Security, U.S. Department of the Interior and U.S. Department of Agriculture, regarding cooperative national security and counter-terrorism efforts on federal lands along the borders of the United States was signed in March 2006.



This wilderness plan will reference the MOU and any future revisions as guidance for managing border law enforcement, emergency services and international border issues as it relates to these two wilderness areas. Recommendation has been made to set up a Border Issues Monitoring Program for the two wilderness areas.

Search-and-rescue responsibilities are delegated to the Pima County sheriff’s office. Activities in response to human health and safety emergencies conducted by these entities are addressed in 43 CFR 6303 and BLM Manual 6340. These activities include, but are not limited to, the use of motor vehicles, motorized equipment, mechanical transport or aircraft, and construction of temporary structures or camps, and helispots.

Motor vehicles and motorized equipment also may be used for AGFD law enforcement activities per Section 101(e) of the Arizona Desert Wilderness Act of 1990, where major wildlife violations, e.g., illegal taking of multiple animals or sensitive, threatened or endangered species, have occurred. These activities include, but are not limited to, the use of motor vehicles, motorized equipment, mechanical transport or aircraft, and construction of temporary structures or camps, and helispots.

**Scientific Research** – Concerns were expressed about conducting archaeological surveys and other research.

The BLM Manual 6340 addresses research and collection of management information. Research and information collection in wilderness will be managed to minimize detrimental impacts to wilderness character.

Proposals regarding scientific research are evaluated on a case-by-case basis.

**Wildlife** – Concerns were expressed that no direct references to management of wildlife resources are being considered.

The BLM will determine, in cooperation with the AGFD and USFWS, the potential of terrestrial and aquatic habitat to support wildlife, including special status species.

One wildlife water development exists in the Coyote Mountains Wilderness.

**Special Status Species** – Concerns were expressed about protection of plants and animals including special status species.

The special status species found in these two areas are managed under existing policy in BLM Manual 6340. Instruction Memorandums, Biological Opinions and Conservations Measures are currently in place. Wildlife and/or plant species that become federally listed in the future will be managed under the Endangered Species Act of 1973, as amended.

Conservation measures are generated after consultation with the USFWS pursuant to Section 7 of the Endangered Species Act of 1973 (16 U.S. C. 1531-1544).

Special status species include: (1) species currently listed or considered for listing as threatened and endangered by the USFWS, and (2) species listed as sensitive by BLM.

### **Threatened and Endangered Species**

#### **Baboquivari Peak Wilderness**

Animals:

Jaguar (*Panthera onca*)  
Lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*)

Plants:

Kearney's blue star (*Amsonia kearneyana*)

#### **Coyote Mountains Wilderness**

Animals:

Jaguar (*Panthera onca*)  
Lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*)

Plants:

Pima pineapple cactus (*Corphantha scheeri* var. *robustispina*)

#### **BLM Arizona Sensitive Species**

For both Baboquivari Peak Wilderness and Coyote Mountains Wilderness (October 2005)

Animals:

Desert Tortoise (*Gopherus agassizii*)  
Giant spotted whiptail (*Aspidoscelis burti stictogrammus*)  
Underwood's mastiff bat (*Eumops underwoodi*)  
Allen's (Mexican) big-eared bat (*Idionycteris phyllotis*)  
Small-footed myotis (*Myotis ciliolabrum*)  
Long-eared myotis (*Myotis evotis*)  
Fringed myotis (*Myotis thysanodes*)  
Cave myotis (*Myotis velifer*)  
Long-legged myotis (*Myotis volans*)  
Big free-tailed bat (*Nyctinomops macrotis*)  
Pocketed free-tailed bat (*Nyctinomops femorosaccus*)  
Arizona myotis (*Myotis lucifugus occultus*)  
Cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*)

Plants:

Bartram stonecrop (*Graptopetalum bartramii*)  
Gentry indigo bush (*Dalea tentaculoides*)  
Pima Indian mallow (*Abutilon parishii*)

**Mining Activities** – Concerns were expressed about mining activities in the wilderness.

There is no active mining in these wilderness areas, nor are there any mining claims, mineral leases or permits to remove mineral materials. The Arizona Desert Wilderness Act of 1990 prohibits the filing of any new claims therefore allowances for certain valid existing rights under 43 CFR 6300 no longer apply.

**Air Space Management** – Concerns were expressed about aircraft over flights.

Military flight restrictions are addressed in the Arizona Desert Wilderness Act of 1990. The Act states that "Nothing in this title shall preclude low-level overflights of military aircraft, the designation of new units of special airspace, or the use or establishment of military flight training routes over wilderness areas designated by this title."

The BLM will continue to cooperate with the military in seeking mutually beneficial opportunities to protect the integrity of wilderness airspace, and the natural quiet of these areas.

Civilian aircraft overflights above 2,000 feet above ground level are within Federal Aviation Administration guidelines.

The Department of Homeland Security, Border Patrol activities related to air space management is covered in

the March 2006 Memorandum of Understanding .

**Cultural Resources** – Concerns were expressed about protection of archeological and cultural resources, respect for cultural and traditional sensitivities and surveys of sites.

Both wilderness areas contain historical and important archeological cultural resources. Wilderness designation, in and of itself, does not affect the BLM’s cultural resource management responsibilities. However, the manner in which cultural resources are managed differs within wilderness areas, in that cultural resource management actions must not adversely affect the overall wilderness character of a designated wilderness area. All projects, studies and actions will be carried out in a manner that will not adversely affect the overall wilderness character and will employ the “minimum tool” necessary to accomplish planned tasks.

Cultural resources will be managed under existing BLM policy. The objective is to manage the cultural resources to preserve and protect their integrity. Future cultural resource management actions could lead to the creation of a Cultural Resource Management Plan (CRMP) for the wilderness areas.

To meet this objective, the wilderness areas cultural resources will be allocated among six established categories: Traditional Use, Scientific Use, Public Use, Conservation Use, Experimental Use and Discharged from Management. Categories are defined in Appendix L: Cultural Resource Management Policy.

Compliance with the National Historic Preservation Act, as well as compliance under and established BLM cultural resource management policy would require management of the cultural resources in wilderness areas these to be managed as they would in a non-wilderness area. This would mean that all federal Cultural Resource Laws such as the National Historic Preservation Act would be followed. All potential projects, actions and studies involving cultural resources will be evaluated for wilderness character compliance on a case by case basis.

**Planning Process** – Concerns were expressed about the focus of the plan and what would be considered and addressed, as well as understanding impacts to the Tohono O’odham Nation.

The Wilderness Act of 1964 created the general framework to manage wilderness areas, acknowledging that each wilderness would need its own plan to address

specific issues and concerns or unique situations not addressed in the Act.

BLM staff involved in writing this plan took steps to understand the concerns raised by the Tohono O’odham Nation. These included general impacts to cultural, social and religious values.

This plan recognizes the need to address Native American religious concerns that were not discussed in detail during the initial meetings due to the sensitivity of the subject. Concerns and issues not expressed during the issue gathering process can be addressed on a case-by-case basis.

## **Issues Beyond the Scope of This Plan**

**Adjacent Land Issues** – Concerns were expressed about development and encroachment adjacent to wilderness boundaries.

The Arizona Desert Wilderness Act of 1990 states that there shall be no buffer zones. The fact that non-wilderness activities or uses can be seen or heard from within a wilderness shall not preclude such activities or uses up to the wilderness boundary.

Proposed or existing power lines outside the wilderness boundaries are not addressed in this plan.

Efforts to resolve or mitigate impacts on wilderness areas will be made by the BLM if an activity does have a direct effect on the wilderness areas.

Resolving domestic animal trespass is found in “Issues Solved through Policy or Administrative Action.”

Through this plan the BLM, the Tohono O’odham Nation, and other partners, including the Altar Valley Conservation Alliance, will work together to achieve interests held in common to protect wilderness values and respect Tohono O’odham unique values regarding the lands in the Baboquivari Peak Wilderness.

**Land Status** – Proposals have been made in the past to transfer federal lands, including Baboquivari Peak Wilderness, to the Tohono O’odham Nation.

Proposals such as these must be enacted by Congress and cannot be resolved through this management plan.

**Managing Wilderness** – Concerns were expressed about wilderness management authority.

The Wilderness Act of 1964 and Federal Land Policy and Management Act (FLPMA) identified the four federal agencies which are responsible for the management of federally designated wilderness. The

Wilderness Act further specified that an area designated as wilderness shall continue to be managed by the agency having jurisdiction before designation. The BLM will continue to manage the two wilderness areas.

**Livestock Grazing** – Concerns were expressed about livestock grazing in the wilderness areas including allowing grazing to continue, and avoid overuse by livestock.

Formal decisions proposing modifications to the existing grazing leases would be issued under the grazing program regulations at 43 CFR 4100. Any changes in the acreage of public lands available for livestock grazing or in the availability of forage available for livestock use on a sustained yield basis must be made through amendments to the existing Resource Management Plan.



## **Part VI – Wilderness Management Strategy**

This plan has been designed to serve as the management guidance for the Baboquivari Peak and Coyote Mountains wilderness areas. Implementation will commence following public review and final approval.

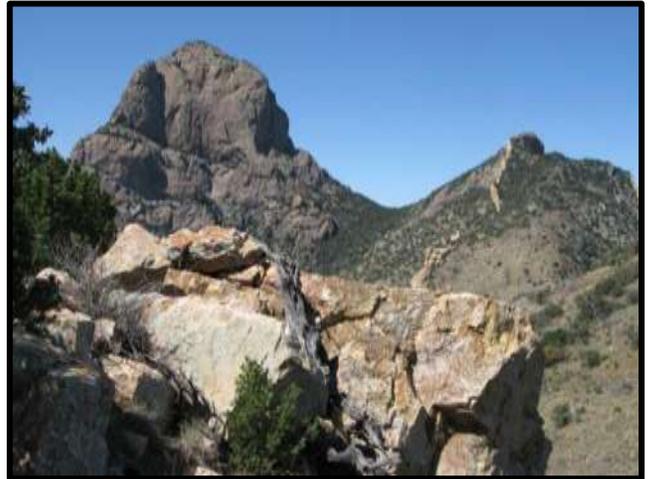
An interdisciplinary team developed four general management objectives and an Interagency Strategic Plan for meeting the National Wilderness Management Goals (see Part IV). The objectives and associated management actions were designed to help meet the goals of preserving wilderness character and vegetative characteristics, while providing protection of cultural resources, primitive recreational opportunities, solitude and the continuation of accepted uses permitted by the Wilderness Act.

The planned actions and monitoring of their effectiveness are designed to ensure that the characteristics that define these wilderness areas remain stable or actually improve.

Future issues, actions or opportunities will be considered on a case-by-case basis. If, through

evaluation, actions are determined to be consistent and compatible with the goals and objectives, they will be incorporated into the plan without amendment of the plan. Inconsistent or incompatible actions will be further evaluated and be subject to public review and comment.

Management objectives will be re-evaluated periodically maintained, and updated as needed.



## Part VII - Wilderness Management (Proposed Action)

In this section, objectives are established to address activity plan issues, identified in Part V under the heading “Issues Addressed in This Plan.” Management actions to meet national wilderness management goals and plan objectives are outlined. Finally, a statement of rationale is included to provide additional clarification.

**Objective 1. Preserve the wilderness character of naturalness. Maintain or enhance natural conditions throughout the wilderness areas, including ecosystem structure and function, visual appearances and opportunities for solitude and natural quiet by:**

- Ensuring the Minimum Requirements Decision Guide (MRDG) is used,
- Improving recognition of the wilderness boundaries,
- Eliminating vehicle intrusions in wilderness,
- Removing, maintaining or repairing existing developments,
- Inventory and evaluating water resources,
- Coordinating with other agencies to achieve mutual healthy land goals, including wildlife, habitat and desired vegetation goals,
- Managing wildland fire,
- Securing year-round administrative wilderness access,
- Adequately monitoring health of the land and wilderness character,
- Inventory, evaluating and mitigating abandoned mine features for human and ecological hazards as well as for habitat and historical/cultural values, and
- Monitoring for and removing unwanted exotic or noxious plant or animal species.

### Management Actions to Accomplish Objective 1:

**Action 1-a** – Ensure that the Minimum Requirements Decision Guide is used to analyze proposed actions and

projects in the wilderness areas:

- A Minimum Requirements Decision Guide training session will be offered annually to all staff assigned to manage or conduct activities inside wilderness. [Minimum Requirements Decision Guide](#)

**Rationale:** Many BLM employees, volunteers, partners or interagency team members may be unaware of the need for a minimum requirements analysis before conducting activities inside wilderness. Using the MRDG increases the assurance that activities and projects taking place inside wilderness complies with the Wilderness Act and policies.

**Action 1-b** – Improve wilderness boundary recognition:

- Post wilderness boundary signs adjacent to private land, the Tohono O’odham Nation, Arizona State Trust Land, Buenos Aires National Wildlife Refuge, and in other areas where awareness of the boundary is critical to protect wilderness values.
- Make a record of sign locations and follow the BLM sign guidebook and standards to maintain the signs throughout the life of this plan.
- Conduct boundary sign monitoring, at a minimum of once every three years. Maintain signs as needed.

**Rationale:** The wilderness areas lack consistent boundary signage. Placing boundary signs helps visitors and adjacent land managers know where the wilderness boundary is located. Appropriate signage may reduce or eliminate unauthorized activities, including, but not limited to, intrusions by motor vehicles.

**Action 1-c** – Remove, maintain or repair developments:

- Wilderness, or allotment boundary, or pasture fences, will be removed, repaired or maintained, according to the guidance found in BLM Grazing Regulations 43 CFR 4310, and by following the Minimum Requirements Decision Guide.
- Negotiate decision(s) with Pima County to cancel range improvements in Hay Hook Allotment (6093), according to the guidance found in BLM Grazing Regulations 43 CFR 4120-3.6.

**Rationale:** A portion of the Coyote Mountains Wilderness boundary fences are adjacent to rural neighborhoods and are either lacking or need replacement to prevent cattle and vehicle trespass. Removal of unnecessary non-historic range developments helps achieve wilderness goals of solitude and naturalness.

**Action 1-d** – Water Resources – Inventory and evaluate water resources:

- Quantify the water sources within the wilderness areas, including the sources for which applications have or have not been filed with Arizona Department of Water Resources. Submit notification of federal reserved water rights for wilderness to the Arizona Department of Water Resources.
- Coordinate with the AGFD to monitor the condition of the 1983 wildlife water development in Coyote Mountains Wilderness. Complete a water development inventory and status report. Water development should be maintained to support the wildlife that depends on it.

**Rationale:** Completion of this action would establish baseline water quantity documentation. This information would help to establish water reservation for wilderness purposes as intended by Congress when the Arizona Desert Wilderness Act of 1990 (Public Law 101-628) was passed.

**Action 1-e** – Fire Management – Wildland fires will be managed for naturalness and public safety:

- By following the guidance of the Gila District Fire Management Plan – Altar Valley – Ironwood – Dripping Springs Unit (2010), the 2004 Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management, and the most recent knowledge of applicable fire ecology: develop, select, and adhere to specific prescriptive parameters for fire use within differing ecological sites in these wilderness areas. Decisions related to managing fires for resource benefit will be documented using the Wildland Fire Decision Support System (WFDSS). This fire management tool allows the Agency Administrator to make an informed decision for management of the incident considering safety, complexity, risk, and economics.
- Decisions related to tactics and techniques

regarding the management of active wildfires within these two wilderness areas will be led by employing the Minimum Requirements Decision Guide and the Minimum Impact Suppression Tactics Guidelines (2003).

[www.wildfirelessons.net/documents/GB\\_Mist\\_Guidelines.pdf](http://www.wildfirelessons.net/documents/GB_Mist_Guidelines.pdf)

- Recommend full suppression, thereby reducing large scale fires for lower Sonoran desert areas in Coyote Mountains Wilderness to protect Sonoran desert plant ecology.
- Managing a naturally ignited wildland fire for resource benefit is recommended for the higher elevations containing Oak Savanna/Chaparral vegetation communities.
- Special attention to vegetation species diversity and desired vegetation conditions will be analyzed by fire staff and interdisciplinary team in order to prepare appropriate fire management strategies for these two wilderness areas.
- Within Baboquivari Peak Wilderness only, naturally ignited fires may be allowed to burn to the maximum extent consistent with specific prescriptive parameters, and the safety of persons, property, and other resources.
- Changes to vegetation health as documented in annual health of the land reports will be considered in setting fire management goals.

**Rationale:** The BLM must manage these wilderness areas as undeveloped, untrammeled, natural and primitive. Fire is a natural component of the Sky Island region, and fire should be managed to enhance the goals of naturalness for each area.

**Action 1-f** – Administrative Access – Secure access to each wilderness:

- Secure a minimum of one year-round, administrative access route to each wilderness, in order that authorized personnel can access each wilderness at any time to conduct management activities.

**Rationale:** BLM employees and authorized groups and/or individuals conducting work in Baboquivari Peak and Coyote Mountains wilderness areas should be able to access each wilderness, as needed, at any time.

**Action 1-g** – Monitor baseline and changes to wilderness character and naturalness:

- Increase and combine wilderness monitoring efforts of among staff and authorized groups and/or individuals, conducting work in the wilderness areas.
- Monitor for and remove unwanted exotic or noxious plant or animal species. Require that certified noxious weed-free forage, mulch and pellets, or the highest quality and lowest percentage of exotic components be utilized by equestrian and pack animals.
- Increase patrols in each wilderness to a minimum of six times a year with BLM staff and partners. Consolidate patrol efforts with needs of the Wilderness Monitoring Program when suitable.

Rationale: The BLM will increase monitoring efforts inside Baboquivari Peak and Coyote Mountains wilderness areas, and consolidate monitoring tasks to reduce the cumulative human impacts inside the wilderness areas.

Certified noxious weed-free forage, mulch and pellets, or the highest quality and lowest percentage of exotic components are [available from many sources in Arizona](#).

**Action 1-h** – Inventory, evaluate, and remediate human health and ecological hazards presented by abandoned mine workings.

- Abandoned mine workings will be inventoried and evaluated for hazards. Hazardous conditions will be remediated using the minimum tool required to accomplish the work.
- Any required remediation of abandoned mine workings will be designed to account for habitat and cultural values as well as the visual impacts of the completed work.

Rationale: In order to establish the conditions of abandoned mine workings within the two wilderness areas, a complete inventory will ensure the safety of the public and preservation of natural and cultural values associated with abandoned mines.

**Objective 2. Preserve Opportunities For Solitude. Enhance high degrees of solitude for wilderness**

**visitors by:**

- Promoting wilderness use ethics, and
- Minimizing human impacts in wilderness throughout the life of the plan.

**Management Actions to Accomplish Objective 2:**

**Action 2-a** – Wilderness Land Use Ethics:

- Promote existing wilderness land use ethics awareness programs, including, *Leave No Trace* to enhance and maintain the wilderness character of outstanding opportunities for solitude.
- Inform the public through outreach efforts promoted by the *Leave No Trace* – Center for Outdoor Ethics. See: [www.lnt.org/](http://www.lnt.org/)

Rationale: Wilderness character is described in terms of: undeveloped, untrammeled, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. In order to preserve these qualities, the practice of Leave No Trace land use ethics is critical.

**Action 2-b** – Potential increase in wilderness visitation:

- Prohibit group sizes of more than 10 people and/or no more than six pack stock per group per visit in the wilderness areas.
- Monitor compliance of recommended group size through a volunteer wilderness stewardship program that reports to the BLM Field Manager and wilderness staff.

Rationale: The current high-quality settings and opportunities for solitude and a primitive experience are expected to change to some extent if legal public access is secured. Visitor awareness of, and practice of, arid wilderness land use ethics such as: recommended smaller group sizes, forgoing campfires, and other *Leave No Trace* land use ethics, contributes to preserving opportunities for solitude.

**Objective 3. Public Availability. Provide for a diversity of primitive, unconfined, recreational opportunities by:**

- Securing one legal public access route for Baboquivari Peak Wilderness, and
- Securing up to two legal public access routes for Coyote Mountains Wilderness.

### **Management Actions to Accomplish Objective 3:**

#### **Action 3-a** – Provide public access by:

- Assigning BLM staff, or contract realty services, to secure legal public access.
- Coordinating with appropriate land owners to identify opportunities for obtaining legal public access.
- Ensuring that the recommendation to pursue legal access into both wilderness areas is included in a future Tucson Field Office Resource Management Plan.

Rationale: Public access to wilderness improves opportunities for a diversity of primitive and unconfined recreation. Securing access to these two wilderness areas will help meet the stated objective. Also, legal users can assist in reporting illegal uses or impacts, resulting in improved management response for each wilderness area. Access strategy guidelines are found in Appendix E.

### **Objective 4. Preserve Unique Features, which include unique natural features or ecosystems, and unique spiritual and cultural values, by:**

- Protecting and managing cultural resources, and
- Increasing coordination and consultation with the Tohono O’odham Nation

### **Management Actions to Accomplish Objective 4:**

#### **Action 4-a** – Manage Cultural Resources in wilderness by:

- Conducting a Class II cultural resource inventory of the Coyote Mountains Wilderness by 2015, and
- Managing the information consistent with cultural resource management guidelines.

Rationale: The BLM is required to conduct inventories and set up long-term protection plans.

#### **Action 4-b** – Issuance of Special Recreation Permits:

- The BLM will consult and coordinate with the Tohono O’odham Nation when the SRP

applications are received for commercial outfitter and guide services for rock climbing activities in Baboquivari Peak Wilderness.

- If an SRP application for commercial use is received for other types of outfitting or guiding services in the Baboquivari Peak Wilderness or in Coyote Mountains Wilderness, group size would remain the same as determined in EA No. Arizona-931-93-001, which is limited to day use or single-night spike camps by small groups (up to 10 people and/or six pack stock per group per visit in the wilderness areas) only. The Tucson BLM Field Manager would determine if the proposed action conforms to the desired primitive conditions, settings and opportunities set in this plan, and is necessary to realize wilderness purposes.

Rationale: After consultation with the Tohono O’odham Nation on commercial use in Baboquivari Peak Wilderness, it was found that the Tohono O’odham Nation does not authorize commercial guided rock climbing on the portion of Baboquivari Peak within the Nation boundaries. Due to the interrelated circumstances of climbing Baboquivari Peak, and the coordinated effort needed for stewardship of Baboquivari Peak Wilderness, the BLM will use the NEPA process and consult with the Tohono O’odham Nation on a case-by-case basis for commercial rock climbing SRP applications in Baboquivari Peak Wilderness.

#### **Action 4-c** – Wilderness visitor information development:

- Coordinate with the Tohono O’odham Nation, Altar Valley Conservation Alliance, and other neighboring landowners and managers to assist in the development of educational and interpretive information. This effort will focus on access information and identifying desired visitor conduct while visiting the wilderness areas. These messages will address and integrate the concerns of the BLM, the Tohono O’odham Nation, Buenos Aires National Wildlife Refuge and interested public and adjacent private landowners. This information may be distributed or displayed at appropriate access points, printed in brochures, maps or made available electronically on the BLM’s and other partners’ web sites.
- Develop information emphasizing border issues and safety, rock climbing rules and etiquette,

access, and emphasize cultural resource protection.

**Rationale:** These actions help preserve Unique Features by including the need to provide for Native American religious concerns and retain the social and spiritual values of both wilderness areas.

The BLM and the community emphasized the need to respect adjacent landowners' values and concerns. As both illegal immigrant and legal visitor use continues to increase, these actions can help reduce impacts to Native American religious concerns as well as impacts to non-Indian cultural and social values of the area.

### **Monitoring Program**

Monitoring will be conducted to gauge the effectiveness of outlined management actions and to determine if plan objectives are being met.

In 2011, the BLM began a long-term monitoring effort based on the statutory requirements of the Wilderness Act of 1964. This monitoring effort assesses trends in various categories of predefined attributes of wilderness character.

The BLM will consolidate all program monitoring needs and efforts when appropriate to minimize human impacts to wilderness area. Monitoring programs can be set up using photos, journals, GPS points, and other wilderness appropriate technology.

The BLM will coordinate with the U.S. Borderland Management Task Force to monitor Arizona-Mexico border undocumented immigration and smuggling impacts and set up monitoring and mitigation plans.

The BLM will apply methodology as taught by the Arthur Carhart National Wilderness Training Center, Aldo Leopold Institute, and other reputable leaders in wilderness management and monitoring programs to monitor wilderness objectives.



## **Part VIII – The “No Action” Alternative**

Under this alternative, management of the Baboquivari Peak Wilderness and Coyote Mountains Wilderness would be considered on a case-by-case basis as directed by the Phoenix Resource Management Plan (1988) as well as guidance from 43 CFR 6300 and the National BLM Wilderness policy as set forth in BLM Manual 6340 (BLM, 2012). Management would remain generally passive, and react only as issues arise. All other programs operating within wilderness such as recreation, wildlife, range, cultural resources and fire would operate without consolidated guidance and all new action would be considered in a separate environmental analysis, following the requirements of the National Environmental Policy Act.

## Part IX – Environmental Consequences

The following critical elements are not affected by the proposed action or alternatives because they do not occur in the project area, or because of the nature of the proposed action:

Areas of Critical Environmental Concern (ACEC)

Air Quality

Floodplain

Wild and Scenic Rivers

Wastes, Hazardous or Solid

Water Quality, Drinking or Ground

Farm Lands (Prime or Unique)

Noxious Weeds

National Energy Policy

Environmental Justice

### Impacts of the Proposed Action

#### Threatened and Endangered Species (T&E)

Impacts of the Proposed Action: Efforts to enhance naturalness values and enhance existing monitoring program for T&E of each wilderness could reduce the net loss to existing species and may increase potential for former species to reestablish.

Impacts of the “No Action” Alternative: Not having an integrated wilderness plan may have a slight impact to the ability to properly manage and monitor changes to the habitat and species health within these two wilderness areas.

#### Cultural Resources

Impacts of the Proposed Action: Potential impacts to cultural resources by project related activities would be expected to be minimal and limited in scope due to the fact that keeping within wilderness character land ethic would eliminate the need for many of the projects the BLM typically proposes. However, if projects were proposed that included ground disturbance these areas would be surveyed for cultural resources prior to project implementation. Existing cultural resources would be monitored with greater frequency and regularity.

Likewise, potential impacts to cultural resources by non-project related activities such as the creation of a Cultural Resource Management Plan would have no negative impact. The impact would be positive. Impacts of the proposed action would also have a positive effect on cultural resources within the wilderness areas. Consultation efforts and public outreach efforts would be expected to increase thus,

providing for a positive benefit for the BLM. The agency would have added access to information concerning all cultural resources within the wilderness areas and could further implement sound management decisions based on this data. Outreach efforts to inform the public not to collect or disturb cultural artifacts and increased hiking patrols by volunteers or agency field staff would reduce impacts to cultural resources.

Impacts of the “No Action” Alternative: The current condition would remain the same.

#### Native American Religious Concerns

Impacts of the Proposed Action: Increased coordination and consultation with the Tohono O’odham Nation would help address Native American Religious Concerns that arise during the life of this plan. Coordinated Tribal consultation efforts could reduce impacts by improving both agency and Tribal and visitor knowledge and understanding of Native American Religious Concerns for these two wilderness areas.

Impacts of the “No Action” Alternative: Current BLM management objectives, as well as federal cultural resource management laws require the agency to consult with Tribes on all management actions that have the potential to impact Native American Tribes. The BLM is aware that Native American Tribes have shown in the past a particular interest in the management of the Baboquivari Peak Wilderness and Coyote Mountains Wilderness and will continue to solicit and consider their comments in future management decisions. The current, most passive management has a slight impact to Native American Religious Concerns by not addressing specific topics that the Tohono O’odham Nation may want to share with the visiting public to reduce undesired impacts to each wilderness area.

#### Wetlands/Riparian Zones

Impacts of the Proposed Action: The existing springs and riparian areas within both wilderness areas would be monitored more often and checked for proper functioning conditions. Regular and increased monitoring efforts would reduce the spread of noxious or undesired vegetation, soil erosion or other impacts to springs or riparian areas.

Impacts of the “No Action” Alternative: The existing riparian canyons and springs within the Coyote Mountains and Baboquivari Peak wilderness areas would be monitored and checked once every ten years for proper functioning standards on a regular basis.

## **Wilderness**

Impacts of the Proposed Action: Wilderness values would be maintained and enhanced for the life of this proposed management plan. The limited scope of recreational activities and increase of educational and land-use ethics messages aimed at wilderness visitors should minimize impacts to wilderness naturalness and wildlife populations including Threatened or Endangered Species. The proposed plan also helps address Native American Religious Concerns, a Unique Feature of these two wilderness areas.

Promoting “Leave No Trace” land use ethics within the areas using web site information, interpretive programs and products would assist in lowering visitor use impacts to the natural values and cultural resources.

There would be short-term impacts to solitude from wilderness patrols and other monitoring activities that would be offset by the long-term benefits of enhancing and maintaining wilderness values and opportunities for primitive recreation.

Efforts would reduce introduction or spread of noxious or undesired vegetation within the two wilderness areas by monitoring access areas and riparian areas. Weeds will be removed using minimum tool and/ or authorized/allowable chemicals.

Emphasizing to the practice of Leave No Trace land use ethics which includes the recommendation to keep group sizes small will help enhance the wilderness experience of solitude and naturalness.

If public legal access is secured, increased use or expansion of existing “social trails” may occur and increased human presence could cause impacts to other wilderness resources. There could be an increase of human impacts including more human waste, garbage, and spread of noxious weeds.

If an influx of undocumented immigration and smuggling activity occurs within the wilderness areas due to outside influence of Department of Homeland Security viewing towers in the Altar Valley, anecdotal evidence suggests the presence of legal visitors could help the various agencies manage and deter the undocumented immigration and smuggling activity inside the wilderness areas.

Impacts of the “No Action” Alternative: There would be no consolidated and coordinated effort to manage the wilderness areas. Each program such as range, wildlife and recreation would not coordinate efforts as comprehensively as this plan proposes, therefore creating some management conflicts.

Lack of non-public legal access points deters many would-be visitors but generally enhances many wilderness values since the primary desired conditions of wilderness is to remain primitive, untrammelled by man with solitude opportunities. However non-public legal access points reduce the achievement of the wilderness objective to provide for primitive recreation opportunities.

Lack of readily available access for the BLM makes it more difficult to manage and monitor these wilderness areas and the BLM will remain tasked to ask neighboring land owner’s permission to gain access to monitor and manage resources inside the wilderness areas.

## **Invasive and Non Native Weeds**

Impacts of the Proposed Action: Increasing monitoring efforts for impacts associated with undocumented immigration and smuggling, livestock grazing and recreational impacts should enhance success at identifying, reducing or eliminating invasive or non-native weeds.

Impacts of the “No Action” Alternative: Invasive weeds would not be detected or monitored on a regular basis.

## **Non-Critical Elements**

### **Public Safety**

Impacts of the Proposed Action: Increased public education and the inclusion of public awareness information regarding undocumented immigration and smuggling and Border enforcement related activities surrounding the access to and inside wilderness should help guide visitors to make informed decisions and plan safe trips into wilderness areas.

Efforts to maintain greater communication between the various law enforcement agencies, such as DHS, BLM, TON and publicizing emergency procedures for this high intensity law enforcement area increases public safety for those accessing or hiking inside wilderness and for BLM staff and permittees conducting administrative activities.

Remediation of hazardous abandoned mine workings would contribute to visitor safety.

Impacts of the “No Action” Alternative: Visitors, permit holders may not get messages about high intensity law enforcement situation in the access routes to these two wilderness areas, and therefore may be

unprepared for smuggling and illegal immigrant encounters.

### **Vegetation**

Impacts of the Proposed Action: Grazing objectives will be monitored more closely, in order to maintain healthy ecological rangeland conditions and maintaining the native vegetation communities by increased scheduled monitoring efforts.

Managed use of fire may benefit the lower elevations of Sonoran desert plant species of Coyote Mountains and the vegetation in the higher elevations. Keeping fences up along areas where cattle or vehicles may enter the Coyote Mountains Wilderness may reduce potential for more non-native vegetation to establish.

Impacts of the “No Action” Alternative: Full suppression of fire would remain for all fires inside wilderness. Vegetation communities would not be monitored with the frequency and detail needed to determine if healthy ecological conditions are being maintained.

### **Wildlife and Wildlife Habitat**

Impacts of the Proposed Action: Goals and objective to maintain wilderness character, such as naturalness, maintaining health of the land and maintaining an integrated monitoring program, will be beneficial to wildlife and wildlife habitat.

If legal access is secured, some wildlife species, including some special status species may be impacted by increased legal public visitors, however with an increase in undocumented immigration and smuggling activities, legal visitors could help report undocumented immigration and smuggling and other border issue impacts that have impacts to wildlife and wildlife habitat, resulting in DHS border mitigation, thus helping reduce overall (illegal users) human impacts to wildlife.

Impacts of the “No Action” Alternative: Coordination with state game and fish may continue to be irregular, and status of wildlife waters would remain unknown.

### **Fire Ecology and Management**

Impacts of the Proposed Action: Recognizing that fire management goals changed from full suppression to appropriate response, fire may be a beneficial impact to higher elevation vegetation. Specific fire strategies for differing Sky Island plant ecological sites within Coyote Mountains should help the overall health of the Sky Island plant communities. Include full suppression or reducing large scale fires for lower Sonoran desert areas in Coyote Mountains to protect Sonoran desert plant

ecology. Managed natural ignition for the higher elevation chaparral vegetation should also be beneficial.

Use of chainsaws and other motorized equipment to manage fire reduces the naturalness of the area and is not consistent with the Wilderness Act.

Managing a natural-ignition wildland fire for resource benefit to Kearney’s blue star habitat will follow conservation measures from the biological and conference opinion of the 2004 Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management. Monitoring impacts after natural fires is a priority.

A full NEPA analysis of fire management actions is included in the 2010 Gila District Fire Management Plan.

Impacts of the “No Action” Alternative: Managing for full fire suppression may have some impact on the vegetation in the higher elevations, full suppression for lower Sonoran desert vegetation in Coyote Mountains Wilderness.

### **Livestock Grazing**

Impacts of the Proposed Action: The continued practice of working cooperatively with the adjacent land owner and agencies and grazing operators will maintain or enhance desired conditions. Actively monitoring range land health and assuring that livestock grazing permits are properly managed using the minimum tool should maintain or improve the existing status of livestock use and reduce livestock grazing impacts within wilderness.

Impacts of the “No Action” Alternative: Livestock grazing developments no longer needed by the grazing program would not be specifically addressed and integrated into wilderness management goals, objectives and action plans.

### **Recreation**

Impacts of the Proposed Action: Opportunities for wilderness recreation opportunities will improve.

Impacts of the “No Action” Alternative: Opportunities would remain the same. Lack of adequate access would continue to limit primitive recreation opportunities. Illegal trespass on adjacent lands to gain access to public wilderness lands would continue.

### **Lands and Realty**

Impacts of the Proposed Action: Securing suitable public and administrative access to wilderness on non-

public lands would have impacts on adjacent land owners, both positive and negative. Readily available

and year-round legal administrative access would increase achieving management goals.

Impacts of the “No Action” Alternative: Limited access opportunities would remain the same, access would be gained through permission by adjacent land owners--not the BLM. Illegal trespass on adjacent lands to gain access to public wilderness lands would continue. Some unsuitable access points may be used that may result in creation of undesired trails and other impacts to neighboring areas such as Buenos Aires National Wildlife area and the Tohono O’odham Nation, State Land Department and private land owners.

### **Cumulative Impacts of the Proposed Action**

Long-term impacts of plan implementation should benefit the wilderness values of solitude and naturalness. Visual resource quality would be improved over the long-term when human imprints are removed or reclaimed, and natural reclamation of land disturbances takes effect.

Ecosystem health, structure and function should be maintained or improved within the wilderness areas. Preserving naturalness and wilderness character will enhance those habitats important to T&E species over time.

Public and administrative access across non-public lands may be either beneficial or negative, depending on the viewpoint and circumstances of a variety of agencies and neighboring adjacent land owners to the wilderness areas. Boundary management identification and enforcement should result in better visitor compliance with wilderness restrictions and consequential avoidance of new degradation to wilderness character. It is anticipated that economic and social impacts to communities would be positive as a result of amenities supplied to wilderness visitors would increase.

### **Cumulative Impacts of the “No Action” Alternative**

The water resources within the Baboquivari Peak and Coyote Mountains wilderness areas would seldom be monitored and checked for proper functioning standards and their condition of improvement or decline may not be known. If impacts associated with undocumented immigration and smuggling increase, the visiting public may remain unaware of safety issues. These impacts would likely continue to encroach into each wilderness and begin to deteriorate wilderness values, and would

not be monitored or managed nor mitigated on a regular basis.

Not having readily available administrative access inhibits the BLM’s ability to effectively manage and monitor the wilderness areas.

## **Mitigation**

Mitigation for the proposed action or “No Action” alternatives are guided by the BLM National Wilderness Management Policy and are therefore the same. Mitigation measures specific to the Baboquivari Peak and Coyote Mountains wilderness areas are as follows:

- Administrative actions should be scheduled for periods when there is the least potential for impacts to vegetation, wildlife and the wilderness visitors.
- Only the minimum tool or action necessary to reasonably accomplish management objectives would be authorized for use.
- Implementing the proposed action would increase a long-term goal of addressing Native American Religious Concerns and maintain wilderness values throughout the life of the plan. The proposed action provides for improved management effectiveness over time for sustaining wilderness values and characteristics for naturalness, solitude and primitive recreation.



## **Part X – Plan Evaluation**

The BLM's Tucson Field Office would periodically evaluate the effectiveness of plan implementation. This evaluation would be completed prior to preparing the annual budget to accurately reflect the possibility of changing needs and priorities. Evaluation would include the following:

1. Document completed management actions. Identify management actions to be completed the following year.
2. Analyze monitoring data to determine if plan objectives and national goals are being met.
3. If needed, recommend and select new management actions.
4. A comprehensive review of this wilderness management plan would be undertaken approximately once every ten years.

## Part XI – Plan Implementation Schedule

Planned Action	Special or Recurring Projects	Responsible Parties	Estimated BLM Work Months* Per Year	Estimated Material, Supplies, and Contract Costs
1. Ensure BLM staff use MRDG when making decisions.	RP	BLM Field Manager and Wilderness staff	.5 wm	\$1,000 per course
2. Wilderness boundary signs installation and maintenance.	RP	BLM Staff	2 wm	\$10,000 (\$1500 annual supplies, more for labor contract)
3. Replace, remove or repair fences.	SP & RP	BLM Staff	2 wm	\$12,000 (\$3,000 annual supplies or contracts)
4. Perform grazing water and fence development inventory and monitoring.	SP & RP	BLM Staff	3 wm	\$2,500
5. Prepare Fire Prescriptive parameters.	SP	BLM Fire, Range and Wilderness Staff	1 wm	\$2,500
6. Acquisition for public and administrative access for each wilderness.	SP	BLM Wilderness staff, Realty or Contract Specialist	2 wm	\$400,000 each
7. Reimbursement to Hay Hook lessee for cancellation of range improvements in Coyote Mountains Wilderness.	SP	BLM Field Manager, Range, and Wilderness Staff	1 wm	Based on Fair Market Value
8. Perform annual wilderness and healthy lands monitoring tasks.	RP	BLM Staff	2 wm	\$1,500
9. Develop wilderness Land Use Ethics visitor information.	SP & RP	BLM Wilderness Staff	1 wm	\$7,000 initial
10. Cultural Resources inventory and monitoring.	SP & RP	BLM Archaeologist	3 wm	\$25,000
11. Special Recreation Permits	RP	BLM Wilderness Staff, TFO Staff	1 wm	\$1,500
*one work month (wm) = 173 hours				

## Part XII – Consultation, Coordination, and Public Comments

### List of Contributors:

Tohono O’odham Nation  
Altar Valley Conservation Alliance  
Public Planning Group

### Prepared and Reviewed by:

#### BLM – Tucson Field Office

Catie Fenn	Outdoor Recreation Planner
Jim Mahoney	Outdoor Recreation Planner
Max Witkind	Archaeologist (retired)
Amy Sobiech	Archaeologist
Grant Drennen	Range Management Specialist (retired)
Kristen Duarte	Range Management Specialist
Susan Bernal	Realty Specialist
Daniel Moore	Geologist
Darrell Tersey	Natural Resource Specialist
Al Mezzano	Park Ranger
Leslie Uhr	GIS Specialist
Ben Lomeli	Hydrologist
Amy Markstein	STEP-Biological Technician

#### BLM – Gila District Office

Diane Drobka	Public Affairs Specialist
Mark Pater	Fire Ecologist

#### BLM – Arizona State Office

Ken Mahoney	National Landscape Conservation System/Natural Resource Specialist
Gary Stumpf	Archaeologist (retired)
Ted Cordery	Threatened and Endangered Specialist (retired)
Bill Grossi	Wildlife Biologist (retired)

#### U.S. Forest Service – San Juan National Forest

Mark Lambert	Supervisory Biological Scientist
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### Public Comment Letters:

1. Letter from American Mountain Guides Association
2. Letter from Gila River Indian Community
3. Letter from Mary & Charley Miller, and John & Pat King, and Joe & Sarah King: Elkhorn & Anvil Ranches
4. Letter from Sky Island Alliance
5. Letter from Frances W. Werner

Letters and comments were evaluated for substantive contribution to this wilderness management plan, based upon guidance found in BLM manual and policy regarding public comments received.

According to the BLM's Handbook H-1790-1, the National Environmental Policy Act Handbook, page 66, states that substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS or EA.
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis.
- Present new information relevant to the analysis.
- Present reasonable alternatives other than those analyzed in the EIS or EA.
- Cause changes or revisions in one or more of the alternatives.

Comments that are not considered substantive include the following:

- Comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above (such as "we disagree with Alternative Two and believe that the BLM should select Alternative Three").
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above (such as "more grazing should be permitted").
- Comments that don't pertain to the project area or the project (such as "the government should eliminate all dams," when the project is about a grazing permit).
- Comments that take the form of vague, open-ended questions.



Jim Mahoney  
BLM San Pedro Field Office  
1763 Paseo San Luis  
Sierra Vista, AZ 85635

September 6, 2012

Mr. Mahoney:

The American Mountain Guides Association (AMGA) would like to thank you for the opportunity to comment on the Draft Wilderness Management Plan / Environmental Assessment (WMP) for the Baboquivari Peak and Coyote Mountains Wildernesses. In general, we support the Proposed Alternative's vision of maintaining a high level of wilderness character, while providing for increased legal public access.

**About the AMGA**

The American Mountain Guides Association (AMGA) is a national 501(c)(3) non-profit organization that has been supporting the mountain guiding and climbing instructor community for over 30 years. The AMGA inspires an exceptional client experience by being the premier source for training, credentials, resource stewardship and services for professional mountain guides and climbing instructors in the United States. The AMGA is an educational institution, an accrediting body, and a standard setting organization that is our nation's sole representative to the twenty-five member-countries International Federation of Mountain Guides Associations (IFMGA), the international governing body responsible for guiding standards around the world.

Since its genesis in 1979, the AMGA has grown to represent over 2,500 members that are represented in 49 states and 13 countries, over 30 Accredited Guide Services and educational institutions, and 60 Corporate Partners. Each year the training provided by the AMGA reaches over 700,000 people through direct contact between certified guides, climbing instructors, accredited programs, and their clients.

The AMGA provides education, training and certification in the disciplines of alpine climbing, rock climbing, and ski mountaineering. It also raises the standards of guide services and climbing schools with regard to safety, Leave No Trace practices, client care, education, and wilderness stewardship. The AMGA adheres to the strictest of standards that are rigidly enforced to ensure our certified guides, climbing instructors, and accredited programs are the nation's preeminent experts on climbing and ski mountaineering best practices.

**Specific Comments**

The AMGA fully supports many of the proposed actions contained in this Alternative. We believe that improving Wilderness boundary signage, securing legal public access, limiting large groups, and an educational focus on Leave No Trace ethics and desert-specific techniques, all contribute strongly to



maintaining Wilderness character and realizing Wilderness purposes. We support the BLM's stance on fixed anchors and climbing management expressed in this document, finding that the prohibition on power drills, combined with a strong local wilderness climbing ethic, are sufficient management tools to preserve historical climbing activity and provide for resource protection.

As regards the provisions for the issuance of Special Recreation Permits (SRPs) for climbing guide services in the Baboquivari Peak Wilderness, the AMGA supports the intent expressed in the WMP. We understand the complexities of cultural issues as they relate to commercial guiding, and appreciate that the BLM is choosing to not institute a complete prohibition on SRPs. We understand the need to consult with the Tohono O'odham Nation, as well as utilize the NEPA process for assessing climbing SRP applicants, as this area is of great cultural significance. The AMGA realizes that guided climbing is not in huge demand in this area, but we are nevertheless concerned that these provisions could constitute a *de facto* prohibition on guided climbing, and would like to offer a few suggestions that may assist in the consideration of future SRP applications.

An AMGA certified guide or accredited program is an important, and often underutilized, resource in the field. Wilderness ethics are ingrained into our training and assessment programs. Credentialed guides realize that preservation of the wilderness resource is not only inherently valuable, but is essential for their continued livelihood. It is our recommendation that strong consideration be given to SRP applicants who are AMGA certified guides or accredited programs, or that certification and /or accreditation be made a prerequisite for rock climbing SRPs. This would ensure the highest standard of resource protection and safe climbing practices, as well as public education about the cultural sensitivities and the unique desert ecosystem.

Thank you very much for the opportunity to comment on this Draft Wilderness Management Plan / EA. The AMGA is happy to be involved in the public planning process, and seeks to be a resource to our public land managers across the United States. If you have any questions, or would like further information about AMGA certification or accreditation, please do not hesitate to contact us.

Sincerely,

Scott Massey  
Outreach and Advocacy Director

## **BLM Response to American Mountain Guides Association**

The BLM Tucson Field Office appreciates the comments of the American Mountain Guides Association.

On page two, paragraph two, the Association states its concern that provisions for consultation with the Tohono O’odham Nation could constitute a *de facto* prohibition on guided climbing.

- As stated in this wilderness management plan, the BLM “will use the NEPA process and consult with the Tohono O’odham Nation on a case-by-case basis for commercial rock climbing SRP applications in Baboquivari Peak Wilderness.” This is standard operating procedure. The BLM would request comments from neighboring, and/or potentially affected land owners, and interested parties, regarding specific activities proposed for these two wilderness areas. The BLM Tucson Field Manager would determine if the proposed action conforms to the desired primitive conditions, settings and opportunities set forth in this plan, and is necessary to realize wilderness purposes. No predeterminations regarding the issuance of SRPs have been made or are implied in this plan.

On page two, paragraph three, the Association recommends that “strong consideration be given to SRP applicants who are AMGA certified guides or accredited programs, or that certification and/or accreditation be made a prerequisite for rock-climbing SRPs.”

- The BLM Tucson Field Office is not authorized to make allocations for SRPs to this degree of detail in this wilderness management plan. In fact, the issuance of SRPs in general is a discretionary action. However the BLM agrees that guide certification from the American Mountain Guides Association, or a similar certification program, would be a highly appropriate requisite when considering the qualifications of an SRP applicant.
- Please refer to the BLM’s regulations on management of designated wilderness areas found in [43 CFR 6302](#) and [H-2930-1 RECREATION PERMIT ADMINISTRATION](#).



# GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2140, SACATON, AZ 85147

TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162  
Fax: (520) 562-5083

September 25, 2012

Brian B. Bellew, Field Manager  
Bureau of Land Management  
Tucson Field Office  
3201 East Universal Way  
Tucson, Arizona 85756

RE: Review Draft Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Program and Environmental Assessment, Pinal County, Arizona

Dear Mr. Bellew,

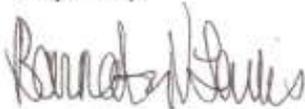
The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received your consultation documents dated August 24, 2012. The Bureau of Land Management (BLM) is preparing a management plan for the Baboquivari Peak Wilderness and Coyote Mountains emphasizing protecting and preserving natural features, retaining social and spiritual values of the land, continuing special uses of the land, and coordinating management plans with public and agency groups. The land within the proposed wilderness areas are a mix of Arizona State lands, federal lands, and private lands. The Baboquivari Peak wilderness will be 2,065 acres in size and the Coyote Mountains Wilderness will be 5,080 acres in size. The Baboquivari Peak wilderness area was archaeologically surveyed in 2000. Three archaeological sites and six isolated occurrences were recorded. The three sites are considered Register eligible properties as defined by § 106 of the National Historic Preservation Act (NHPA). The Coyote Mountains Wilderness was partially surveyed in 1989 and 1990. Archaeological sites were recorded, but the number of sites recorded is not presented in the document nor are site Register eligibility determinations. Sentence descriptions of the presence of Preclassic and Classic Period Hohokam sites indicate that the sites are likely Register eligible properties. The BLM acknowledges that Baboquivari Peak and the associated landscape of the proposed wilderness areas are Traditional Cultural Properties (TCP). The draft EA emphasizes protection of the cultural resources and wilderness areas through the management of access to the wilderness areas, monitoring of conditions of the designated wilderness areas, permitting scientific research of the biological ecology of the wilderness areas as well as conducting archaeological inventories to collect data on site type, site chronologies, and site locations enhancing land management efforts. Land development projects are not allowed within designated wilderness boundaries.

While the GRIC-THPO for the most part, agrees with the BLM plans to designate Baboquivari Peak and the Coyote Mountains as wilderness areas, we have concerns about recreational access to Baboquivari Peak. The east side of Baboquivari Peak is accessible through undeveloped trails and roads which cross the proposed wilderness area. The west side of Baboquivari Peak is on Tohono O'Odham lands. While permission is necessary from the Tohono O'Odham Nation to climb on the west side of the peak, access to the east side of the peak is not controlled. Technical climbing of Baboquivari Peak is allowed on the east side of the peak and the BLM should make every effort to halt such climbing of the peak through restriction of peak access. Baboquivari Peak meets the eligibility requirements for listing on the National Register of Historic Properties as a TCP. Baboquivari Peak has retained its traditional cultural significance to the Tohono O'Odham. Allowing modern, recreational type access to the peak is exceedingly disrespectful to the O'Odham of Southern Arizona, and in particular, the Tohono O'Odham Nation.

The GRIC-THPO recommends that restricted access to east side of Baboquivari Peak be included as part of the proposed wilderness management plan. We also request copies of the 1989, 1990, and 2000 archaeological survey reports for our records, and copies of all future archaeological survey reports for our review. The proposed project area is within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'Odham Nation). The GRIC-THPO defers to the Tohono O'Odham Nation as lead in the consultation process.

Thank you for consulting with the GRIC-THPO. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,



Barnaby V. Lewis  
Tribal Historic Preservation Officer  
Gila River Indian Community

## **BLM Response to the Gila River Indian Community**

The BLM Tucson Field Office appreciates the comments of the Gila River Indian Community – Tribal Historic Preservation Office (GRIC-THPO).

On page two, paragraph one and two, the GRIC-THPO requests that the BLM close climbing of, and modern recreational access to, Baboquivari Peak through restricting access on the eastern side of the wilderness area.

- While the BLM respects the position of the GRIC-THPO regarding the traditional cultural significance of Baboquivari Peak to the Community and the Four Southern Tribes, the Wilderness Act of 1964 specifically authorizes this designated wilderness, which “has outstanding opportunities for solitude or a primitive and unconfined type of recreation.” And in Section 2(c), “shall be devoted to the public purposes of recreation, scenic, scientific, educational, conservation and historic use.” In Section 4 (b) the Act states that the managing agency, in this case the BLM, “shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes

for which it may have been established as also to preserve its wilderness character.”

- Regarding the issue of technical climbing, especially commercial and/or organized groups, the BLM “will use the NEPA process and consult with the Tohono O’odham Nation on a case-by-case basis for commercial rock climbing SRP applications in Baboquivari Peak Wilderness.” This is standard operating procedure. The BLM would request comments from neighboring, and/or potentially affected land owners, and interested parties, regarding specific activities proposed for these two wilderness areas. The BLM Tucson Field Manager would determine if the proposed action is necessary to realize wilderness purposes and conforms to the desired primitive conditions, settings and opportunities set forth in the Wilderness Act and in this management plan.
- Please refer to the BLM’s regulations on management of designated wilderness areas found in [43 CFR 6302](#) and [H-2930-1 RECREATION PERMIT ADMINISTRATION](#).

September 15, 2012

To: Mr. Jim Mahoney  
US Bureau of Land Management  
1763 Paseo San Luis  
Sierra Vista, Arizona 85653

[TFOWEB\\_AZ@blm.gov](mailto:TFOWEB_AZ@blm.gov), by email

Mr. Brian Bellew, Field Manager, [brian\\_bellew@blm.gov](mailto:brian_bellew@blm.gov) and  
Ms. Karen Simms, Acting Assistant Field Manager, [ksimms@blm.gov](mailto:ksimms@blm.gov)  
US Bureau of Land Management, Tucson Field Office  
3201 East Universal Way  
Tucson, AZ 85756

From: Mary and Charley Miller, Elkhorn Ranch, [mary@elkhornranch.com](mailto:mary@elkhornranch.com), 520-822-1040  
John and Pat King, Joe and Sarah King, Anvil Ranch, [anvilranch@gmail.com](mailto:anvilranch@gmail.com), 520-822-1065

Regarding: Comments due 9/22/12 on the *Baboquivari Peak Wilderness and Coyote Mountains Wilderness Draft Wilderness Management Plan and Environmental Assessment, August 2012*  
\*\*\*\*\*

Thank you for the opportunity to comment on the Baboquivari Peak and Coyote Mountains Wilderness Draft Wilderness Management Plan. Before we comment about the plan itself, we would like to offer a few observations about the planning process. As ranchers with leases in these wilderness areas, and as leaders of the Altar Valley Conservation Alliance, we have participated in every meeting, discussion, and opportunity for public involvement related to this plan. As the plan itself notes on page 50, public involvement on this plan began and ended 12 years ago, in the year 2000. We have had little to no communication with BLM concerning this plan from 2000 up to the present, and we have asked for news on many occasions. Furthermore, BLM did not provide either ranching family with formal notice of this plan at the beginning of the plan comment period, which presumably occurred 30 days prior to the September 22, 2012 deadline. Luckily, a BLM employee knew of our ongoing interest in the plan and requested that it be sent to the Anvil Ranch about one week into the comment period. We are dismayed that BLM did not consider permittees to be key players in this process, both in the time leading up to publishing the draft plan and at the time when the plan was sent out for review.

Speaking more broadly, we hope to use this as way to launch a positive and constructive outreach to the BLM Field Office. Collaborative conservation in the Altar Valley is happening, and we would very much like BLM to become more actively involved. We have some exciting projects related to fire management as well as erosion control and restoration, and we would like engage BLM as a more active partner in our efforts. While BLM does not manage a lot of land in the Altar Valley watershed, the sky island country that you are responsible for encompasses vitally important country in the upper reaches of the watershed. We not only value but need your partnership. Looking back, we regret not focusing more outreach effort with BLM staff and leadership – we could have done more, and for that we apologize. We would like to suggest that BLM consider appointing a staff person to be a point of contact with the Altar Valley Conservation Alliance, and we can look for ways to work together more effectively on things like this wilderness management plan, along with other topics and opportunities of mutual interest. We are scheduling meetings to bring partners together to talk about wildfire and prescribed fire this winter, and very much hope that BLM will attend. Our Program Director Sarah King will be contacting you this fall with the details.

Miller/King Comments due 9/22/12 on the *Baboquivari Peak Wilderness and Coyote Mountains Wilderness Draft Wilderness Management Plan and Environmental Assessment, August 2012* – Page 1

Turning our attention to the task at hand, we have provided comments on the draft wilderness management plan. If you have questions or would like to discuss our comments, we welcome the chance to talk with you. You will find that our most important areas of interest revolve around fire management, repair of the fence-line along the western edge of both wildernesses, public safety related to illegal immigration, removing Pima pineapple cactus as a species of concern for Baboquivari Peak Wilderness, and the overall need for coordination and collaboration between all partners who care about these mountain ranges and the Congressionally designated wilderness areas that form the upper reaches of a vast portion of the Altar Valley watershed.

1. In general, we support the Proposed Action that would result in there being a wilderness management plan. We do not support the No Action Alternative.
2. Throughout the plan, there are references to Altar Valley Alliance. The correct name of the group is *Altar Valley Conservation Alliance*.
3. We would like to learn more about the *Baboquivari-Silverbell Habitat Management Plan* referenced on page 8 – how can we access that plan?
4. The Special Status Species Section on page 12 has possible errors and/or points of confusion.
  - a. The sentence “There have been several jaguar sightings within the last 15 years in the Baboquivari Mountains” could be interpreted as meaning several different jaguars. In fact, there have been separate sightings of the same jaguar, Macho B, which is now deceased. This should be clarified and referenced more specifically.
  - b. We believe that the plan should not reference Pima pineapple cactus as a special status species related to Baboquivari Peak Wilderness, as the lowest elevation for this wilderness is about 5200 ft (pg 11) and Pima pineapple cactus occur between 2300-4700 feet.
  - c. White tail deer are not a “special status” species, according to your own lists.
  - d. We are concerned about the bighorn sheep comments, as they appear to suggest that the Coyote Mountains are an important sheep area, which simply isn’t true, as acknowledged by your own statement that the last verified sighting was in 1979. In this plan, you state: “The Coyote Mountains are also recognized as crucial white tail deer habitat as well as being bighorn sheep habitat.” Bighorn are not on your special status species list, so do not warrant being discussed in this Special Status Species Section. Also, the term “crucial” is a subjective term. It should be noted that we find the idea of bighorn sheep management in this area to be very interesting and positive, but it is an inaccurate reach to say that there is currently any activity with this species in the Coyote Mountains.
5. Throughout the document, there are references to the fence along the crest of the Baboquivaris. On page 13, it is described as a cultural resource site – a “historical period fence marking the boundary between BLM and Tohono O’odham Nation”. (Referenced again on page 15) In general, it is very important that this fence be considered an improvement of vital modern-day importance for parties on both sides of the mountains. The Nation has posted No Trespassing signs on the fence, and in recent years, has taken trespass onto Nation lands very seriously; as ranchers, we rely heavily on the fence for management purposes. Without an effective fence, neither livestock nor the ranch resources may be managed wisely. The fence is in extremely poor repair in many places, due to age, illegal immigrant impacts, and damage from wild fires and fire crews. It is extremely important that BLM work with lessees and the Nation to maintain and repair this fence.
6. On page 14, what does the term “undeveloped portal” mean?
7. On page 21, the paragraph describing access through King Anvil Ranch is factually incorrect. The paragraph should be edited as follows: “A limited seasonal access to Coyote Mountains Wilderness is located west of Highway 286 across private land on the King Anvil Ranch and across Arizona State Trust Land from September through the end of February. This seasonal access was granted through an agreement between King Anvil Ranch and Arizona Game and Fish Department.”

- b. Please provide more specifics about the “recommendation ... to set up a Border Issues Monitoring Program for the two wilderness areas”, referenced on page 29.
13. Please provide citations with regard to Arizona Game and Fish regulations concerning mountain lion hunting and use of dogs. The term “jaguar habitat” is perhaps used incorrectly here, as there is no designated habitat for jaguar. In fact, designation of legally defined critical habitat is presently under consideration.
  14. On page 30, we do not agree with listing Pima pineapple cactus as a T&E species with regard to Baboquivari Peak Wilderness, due to the fact that cactus occurs at elevations below the wilderness area’s lowest elevation.
  15. We commend BLM for asserting, on page 31, that “through this plan the BLM and Tohono O’odham Nation will work together to achieve interests held in common”. We respectfully recommend that you edit that sentence as follows: through this plan the BLM, the Tohono O’odham Nation AND OTHER PARTNERS, INCLUDING THE ALTAR VALLEY CONSERVATION ALLIANCE, will work together to achieve interests held in common. There are many neighbors and partners concerned about BLM lands and wilderness values, and this plan should do all it can to provide a context to support broad based collaboration.
  16. On page 35, with regard to the fire management actions, we request an opportunity to have some discussion with BLM about these actions. This section is confusing and is not clear where and how the range of fire management options, from full suppression to allowing burning under the right conditions, will be decided. We definitely commend BLM for integrating this flexibility into the plan, but we are unclear on the details.
  17. On page 36, where BLM speaks of increasing patrols to a minimum of six times per year, are you setting the agency up for failure to meet its own standards with this goal? In our experience, BLM is not able to patrol these wildernesses often. It seems important to be realistic about these goals. Also, please explain more about what is meant by integrating patrols with the “Wilderness Monitoring System”.
  18. On page 37, we respectfully ask that you specifically include the Altar Valley Conservation Alliance as one of the parties with whom you coordinate to develop wilderness visitor information.
  19. As mentioned above, we do not support the No Action Alternative described on page 39.
  20. On page 45, the Plan Implementation Schedule, we again want to emphasize the importance of fence repair along the crest of the mountains. We do not want boundary fences to be removed! They either need replacement or repair. We welcome the opportunity to work with BLM to identify priority areas for fence work.
  21. On page 58, we would like to work with BLM to add more detail to the fire use and the prescribed fire objectives, as well as Non-Fire Fuels Treatment Objectives. The Altar Valley Conservation Alliance works with many partners interested in watershed health, and would like to take definite steps to work more closely with BLM on these issues within Wilderness lands, as well as other BLM holdings in the Altar Valley watershed. A first step would be to appoint a BLM staff person to be a liaison or point of contact between BLM and AVCA. A second step that could be taken during the fall of 2012 and winter 2013 would be to assign BLM personnel to attend Altar Valley Conservation Alliance sponsored meetings concerning fire management.

Thank you for the opportunity to comment on the *Baboquivari Peak Wilderness and Coyote Mountains Wilderness Draft Wilderness Management Plan and Environmental Assessment, August 2012*, and we look forward to working with you to create more interaction between BLM staff and Altar Valley partners and agricultural operators in the near future.

**BLM Response to Mary & Charley Miller, and John & Pat King, and Joe & Sarah King: Elkhorn & Anvil Ranches**

The BLM Tucson Field Office appreciates comments from neighboring land owners on the Draft Baboquivari Peak Wilderness and Coyote Mountains Wilderness – Wilderness management Plan and Environmental Assessment.

In the first paragraph on page one, the Altar Valley Conservation Alliance (AVCA) states that the BLM was remiss in providing formal notice for the submission of comments to the Draft Wilderness Management Plan.

- This was an unintentional oversight on the BLM's part, and in the future, the Altar Valley Conservation Alliance will be contacted regarding proposals and actions which may affect the group.
- The BLM will be in contact with the AVCA regarding their request for the designation of a BLM Tucson Field Office contact person.

On page two, numbered comments of the AVCA include:

4.a. Regarding potential misinterpretation of jaguar populations; the BLM is not quantifying the population of jaguar. The USFWS and AGFD are responsible for the management of special status species, and quantifying populations.

4.b. In reference to the assertion that Pima pineapple cactus does not exist in the Baboquivari Peak Wilderness, as a result of the Biological Assessment conducted for this wilderness management plan, text has been

modified to corroborate that Pima pineapple cactus occurs only in the Coyote Mountains Wilderness.

4.d. In reference to the AVCA's comment that desert bighorn are not a Special Status Species in the Baboquivari Mountains. This is correct and has been modified in the text accordingly.

6. Clarification was asked of the term "portal." The BLM considers a 'trailhead' an official designation of a recreational facility which provides access into public land. A "portal" is a general term describing a threshold or entrance into an area.

10. The AVCA requests the definition of the BLM's estimates on "moderate" visitation to these wilderness areas. This statement is based upon visual indicators of public presence.

11 and 16. The BLM appreciates the participation of the AVCA regarding fire management in the region. Please refer to Appendices E and F for the BLM's specific direction for fire management in the Altar Valley, "Excerpt from the 2010 Gila District Fire Management Plan: Altar Valley – Ironwood – Dripping Springs Unit."

21. Concern was expressed regarding the removal of wilderness boundary fences. In fact, Action 1-c refers to the general removal, repair or maintenance of all non-historic fencing located in these two wilderness areas. Wilderness boundary fences are not scheduled for removal. Fence management is contained in the [BLM Grazing Regulations 43 CFR 4310](#).



September 21, 2012

Mr. Jim Mahoney  
BLM Gila District Office  
1763 Paseo San Luis  
Sierra Vista, AZ, 85635  
Email: [jmahoney@blm.gov](mailto:jmahoney@blm.gov)

Re: Draft Wilderness Management Plan and Environmental Assessment for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness

Dear Mr. Mahoney,

These comments are being submitted in response to the Draft Wilderness Management Plan ("Plan") and Environmental Assessment (EA) for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. Sky Island Alliance (SIA) is a non-profit conservation organization dedicated to the protection and restoration of the rich natural heritage of native species and habitats in the Sky Island region of southeastern Arizona, southwestern New Mexico, and portions of Sonora and Chihuahua in northwestern Mexico. SIA works with volunteers, scientists, land owners, public officials, and government agencies to establish protected areas, restore healthy landscapes, and promote public appreciation of the region's unique biological diversity. We appreciate the opportunity to provide the following comments on this Wilderness management plan and associated EA.

**1. Applicable Laws, Regulations, and Agency Policies**

The Bureau of Land Management (BLM) is required to develop wilderness management plans for all BLM lands that have been designated by Congress as part of the National Wilderness Preservation System (NWPS).<sup>1</sup> "The wilderness management plan sets forth the management practices and actions which will be used to maintain the area's wilderness resources considering the identified wilderness management issues."<sup>2</sup> Agency guidance states that "Wilderness management plans must be high-quality documents reflecting professional effort in their preparation."<sup>3</sup>

The development of wilderness management plans is guided by BLM Manual 8561: *Wilderness Management Plans*.<sup>4</sup> In addition, the agency must comply with the requirements of the National Environmental Policy Act (NEPA) and its implementing regulations developed by the Council for Environmental Quality (CEQ),<sup>5</sup> the BLM is also required to follow its own internal guidance for complying with NEPA, found in the *BLM National Environmental Policy Act Handbook*.<sup>6</sup>

**2. The BLM has Failed to Comply with its Own Requirements for Public Involvement.**

The agency has an obligation under NEPA to facilitate public participation by ensuring "that environmental information is available to public officials and citizens before decisions are made and

<sup>1</sup> Bureau of Land Management (BLM), Management of BLM Wilderness, Manual 6340, 1-1.

<sup>2</sup> BLM, Wilderness Management Plans, Manual 8561, 08B.

<sup>3</sup> *Id.* at 15.

<sup>4</sup> BLM Manual 6340 at 1-66.

<sup>5</sup> 40 C.F.R. §§ 1500-1508 (2010).

<sup>6</sup> BLM, National Environmental Policy Act (NEPA) Handbook H-1790-1 (January 2008).

before actions are taken.<sup>7</sup> Implementing regulations promulgated by the CEQ require agencies to “[m]ake diligent efforts to involve the public in preparing and implementing their NEPA procedures.”<sup>8</sup> More directly, the agency’s own policies require public involvement in the development of each wilderness management plan, and specifically require that “a minimum of one meeting, workshop, or open house must be open to the general public, and the public must be given at least 45 days to comment upon the draft wilderness management plan.”<sup>9</sup> However, here the BLM has only given the public 30 days to comment on this Plan, in clear violation of its own policies, and to the best of our knowledge the agency has also failed to provide the required public meeting, workshop or open house.

**Recommendations:** The BLM must reopen the public comment period on this document so that the 45-day requirement is met, and must schedule one open house, workshop or meeting on this draft management plan, as required by its own policies.

### **3. The Process Used to Identify the Scope of Issues is Outdated and Insufficient.**

According to CEQ implementing regulations, the purpose of a scoping period is to determine the scope of issues to be addressed and for identifying the significant issues related to a proposed action.<sup>10</sup> Scoping is also used to engage other agencies, affected stakeholders, and the public,<sup>11</sup> and to solicit relevant information from these parties.<sup>12</sup>

Agencies preparing environmental assessments are not required to engage in an external scoping process.<sup>13</sup> However, the BLM NEPA Handbook states the numerous benefits of conducting public scoping are “essentially the same as for an [environmental impact statement]”<sup>14</sup> and include using the process “to identify coordination needs with other agencies; refine issues through public, tribal and agency feedback on preliminary issues; and identify new issues and possible alternatives.”<sup>15</sup> Importantly, the process also “serves to build agency credibility and promote constructive dialogue and relations with tribes, agencies, local governments and the public.”<sup>16</sup>

The BLM *NEPA Handbook* recommends that the agency “document in the EA your rationale for determining whether or not to conduct external scoping. If you conduct external scoping, document the scoping process, the comments received, and the issues identified and how they were addressed in the EA.”<sup>17</sup> If the BLM decides to conduct an external scoping process, that process must be done correctly and in compliance with all rules, regulations, and agency guidance.

Regardless of whether the BLM conducts an external scoping process under NEPA prior to developing an EA for a wilderness management plan, the agency is nonetheless required by its own policies to “Identify and document in the preplan analysis potential wilderness management related issues that may need to be resolved to attain the preliminary objectives” as well as “utilize current situation information and assumptions documented during the wilderness inventory and study efforts.”<sup>18</sup>

While the agency clearly chose to engage in a public scoping process, twelve full years have passed since any type of external scoping was initiated or conducted on this management plan. The EA states, “The

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7 40 C.F.R. § 1500.1(b) (2016).

8 40 C.F.R. § 1500.6(a).

9 BLM Manual 8561 at 18C.

10 40 C.F.R. § 1501.7.

11 *Id.*

12 40 C.F.R. § 1506.6(d).

13 40 C.F.R. § 1501.7.

14 BLM Handbook H-1790-1 at 1-78.

15 *Id.* at 29.

16 *Id.*

17 *Id.* at 78.

18 BLM Manual 8561 at 42A3.

majority of issues and concerns remain the same as documented in the public planning meetings beginning in 2000. The public and BLM staff have not brought up any new or substantially different issues since that time, with the exception of increased Department of Homeland Security activities.”<sup>19</sup>

However, there is virtually no supporting evidence for the assertion that “issues and concerns” are the same today as they were twelve years ago. In fact, there is no documentation provided whatsoever detailing the scoping process that took place twelve years ago, the comments that were received, the full scope of issues that were identified, or how they were addressed in this EA, despite the clear recommendations found in the agency’s own policies.<sup>20</sup> There is no indication when the last external scoping notice or public meeting took place, or if there were any noticed or publicized opportunities for interested and affected stakeholders to provide additional information or input to the BLM. It is puzzling how the agency would know if any new issues or concerns had emerged if it has not solicited – or provided any opportunities for – for any additional input.

It is also unclear if or how any internal scoping proceeded during the intervening twelve years between when issues were identified and the management plan was drafted. However, what is clear is that the management plan and EA fails to consider a significant amount of relevant data and information that has emerged in the last twelve years. At a minimum, the massive and unprecedented increase in DHS activities in this area, which the EA only briefly references but fails to assess, calls this statement into question. There have also been significant changes related to the affected environment, particularly as it relates to those impacts stemming from climate change. Changes to fire and other management and conservation regimes on adjacent lands have also occurred, and these all must be considered in order to plan management actions effectively and to adequately consider the impact of those actions on the environment. At a minimum, the twelve-year lapse between the external scoping process and the draft Plan and EA undermines the agency’s credibility here.

**Recommendations:** Because the agency has relied on a grossly outdated process for identifying the new issues and concerns that are relevant to this wilderness management plan, and has clearly failed to consider issues and changes to the affected environment that have emerged in the twelve years since this process started, the veracity of this entire document is called into question. It is strongly recommended that BLM re-scope this EA and make an effort to examine the most current issues and concerns related to the management of these wilderness areas, and revise the draft accordingly.

#### **4. The EA Fails to Consider an Adequate Range of Reasonable Alternatives.**

NEPA implementing regulations consider the “Alternatives” section to be “the heart of the” assessment.<sup>21</sup> CEQ regulations call on BLM to “[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” “[d]evote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.” “[i]nclude the alternative of no action,” and “[i]nclude appropriate mitigation measures not already included in the proposed action or alternatives.”<sup>22</sup> BLM internal guidance also anticipates a thorough examination of all “realistic and feasible” alternative management actions, directing the agency to “identify alternative management policies and actions that could be used to resolve each of the issues, and thereby attain identified objectives.”<sup>23</sup> It is through this examination of several different alternative actions that BLM is supposed to develop its suite of alternatives for the environmental assessment.<sup>24</sup>

<sup>19</sup> EA at 28.

<sup>20</sup> BLM Handbook H-1799-1 at 78.

<sup>21</sup> 40 C.F.R. § 1502.14.

<sup>22</sup> 40 C.F.R. § 1502.14 (emphasis added).

<sup>23</sup> BLM Handbook 8561 at .42E.1.

<sup>24</sup> *Id.* at 42F.2.

Despite this direction, and despite the requirements under NEPA to “explore and objectively evaluate all reasonable alternatives,” the Plan and EA only considers a single action alternative in addition to the required “no action” alternative, clearly violating both the spirit and the letter of NEPA and BLM’s own policies. Examples of alternative management actions that should be included in this Plan and EA include consideration of alternative fire regimes and consideration of management actions that are predicated on the future appropriation of less funds and staff for management activities, which is far more in line with current reality for federal land management agencies. We also ask that the BLM consider adding an alternative that incorporates the 2,224 acres of wilderness-suitable lands mentioned under the description of the “Affected Environment”<sup>25</sup> into adjacent designated Wilderness.

**Recommendations:** The BLM must revise this draft EA to include more than a single action alternative, and should, at a minimum, include consideration of alternative fire regimes and alternative management actions that are predicated on the future appropriation of less funds and staff for management activities. We also ask that the BLM consider including the 2,224 acres of wilderness-suitable lands mentioned under the description of the “Affected Environment”<sup>25</sup> into adjacent designated Wilderness.

#### **EA Lacks Relevant Information and Analysis Required for Informed Planning.**

In order to fulfill the purpose of NEPA, the information used as a basis for the analysis of a project’s effects “must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.”<sup>27</sup> Implementing regulations require that the document is “supported by evidence that agencies have made the necessary environmental analyses,” and state unequivocally that “agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses.”<sup>28</sup> While conducting the necessary analyses, “the agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action.”<sup>29</sup>

In those cases when information relevant to the analysis of reasonably foreseeable impacts is missing or incomplete, “the agency shall always make clear that such information is lacking.”<sup>30</sup> However, if the missing information is “essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the [statement].”<sup>31</sup> Should the costs of obtaining the missing information be too high or the means to obtain it unknown, the agency is still required to provide certain information, including: “(1) A statement that such information is incomplete or unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment; and (4) the agency’s evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community.”<sup>32</sup>

With the effects analysis, NEPA imposes a duty on federal agencies to take a “hard look at environmental consequences” of a proposed action. *Natural Resources Defense Council v. Morton*, 458 F.2d 827, 838 (D.C. Cir. 1972). Under NEPA, “conclusory remarks [and] statements that do not equip a decisionmaker to make an informed decision about alternative courses of action, or a court to review the Secretary’s reasoning” are insufficient. *Natural Resources Defense Council v. Hodel*, 865 F.2d 288, 298 (D.C. Cir. 1988). The agency cannot just simply state that impacts may occur, they must provide an analysis of the

<sup>25</sup> EA at 20.

<sup>26</sup> EA at 20.

<sup>27</sup> 40 C.F.R. § 1500.1.

<sup>28</sup> 40 C.F.R. §§ 1500.2(b); 1502.24.

<sup>29</sup> 40 C.F.R. § 1502.9.

<sup>30</sup> 40 C.F.R. § 1502.22.

<sup>31</sup> 40 C.F.R. § 1502.22(a) (emphasis added).

<sup>32</sup> 40 C.F.R. § 1502.22(b).

nature and extent of those impacts. *See Defenders of Wildlife v. Bobbitt*, 130 F.Supp. 121, 138 (D.D.C. 2001) (holding an EIS insufficient because while it stated that noise would increase and pronghorn and their habitat would be disturbed, there was no analysis of the nature and extent of the impacts on the pronghorn) (citing *NRDC v. Hodel*, 865 F.2d at 299).

BLM policies similarly require the use of all current, relevant information when developing wilderness management plans. This includes requirements that the agency “consider all resources involved in the wilderness area and associated management issues and concerns as they relate to the wilderness resource;”<sup>33</sup> “Identify and document in the preplan analysis the specific type, intensity, and source of additional resources and user data needed to undertake the wilderness management planning effort;”<sup>34</sup> and “Utilize current situation information and assumptions documented during the wilderness inventory and study efforts.”<sup>35</sup> Finally, the agency is required to compile all the data necessary to provide “the basis for the formulation, analysis, and comparison of alternative wilderness management actions and for decisions on the use, protection, interpretation, and development of the wilderness resource and other resources ... within its regional and NWPS-wide context.”<sup>36</sup> This includes relevant information “about the wilderness area and its region on such things as: ecologic, geologic, scientific, educational, scenic, historic, and mineral resources; the social and economic environment; and wilderness-related use characteristics.”<sup>37</sup> Overall, “the plan should contain sufficient detail to describe all objectives, policies, and the “what and where” of particular actions.”<sup>38</sup>

This entire document is clearly lacking the necessary documentation required under both NEPA and BLM’s own policies, forcing the public to accept numerous unsupported statements, justifications, and management prescriptions without having the opportunity to review the information or materials that led to the decisions reflected herein. There is also no indication that the most current and best available science has been utilized when describing resources or assessing impacts to those resources. We outline our significant concerns related to this lack of required information and analysis for each plan component and wilderness resource listed below.

#### Related Management Plans

There appears to have been no consideration of related local, state, and federal land use management plans that may affect the management of the wilderness resources at issue here. First and most glaring, there is no mention of these wilderness areas being a unit of the National Landscape Conservation System (NLCS), which is the system of Monuments, National Conservation Areas and Wilderness under the purview of the BLM. The NLCS recently unveiled its ten-year science strategy, which states, “Our mission is to conserve, protect, and restore nationally significant landscapes of outstanding cultural, ecological, and scientific values for present and future generations of Americans.” The strategy presents goals for science within the NLCS, followed by a series of objectives and actions to achieve those goals. The strategy is based on authorities in the Federal Land Policy and Management Act, Antiquities Act, Wilderness Act, National Trails System Act, Wild and Scenic Rivers Act, and enabling legislation and Presidential proclamations for individual units of the NLCS. It is tiered to the BLM’s broader science strategy, while recognizing the unique values of NLCS units. Considering the NLCS is managed by the very same agency that prepared this document, this omission is particularly troublesome and calls into question the veracity of the entire document.

In addition to the NLCS science strategy, this document also fails to incorporate any consideration of the Altar Valley Conservation Alliance’s ongoing Fire Management Plan,<sup>39</sup> or Pima County’s Sonoran Desert

<sup>33</sup> BLM Manual 8561 at .08D.

<sup>34</sup> *Id.* at .42A4.

<sup>35</sup> *Id.* at .42A3 (emphasis added).

<sup>36</sup> *Id.* at 42D.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.* at 41E.

<sup>39</sup> Available at [http://www.ar.nrcs.usda.gov/AltarValley\\_Fire\\_Management.html](http://www.ar.nrcs.usda.gov/AltarValley_Fire_Management.html).

Conservation Plan.<sup>40</sup> Both of these existing plans govern management activities on lands adjacent to these wilderness areas and are very likely to impact management of the resources within these wilderness areas.

**Recommendations:** The Plan must be tiered to the goals, objectives and actions described in the NLCS Science Strategy, and the Plan must also consider the affects of management regimes on adjacent lands that may affect wilderness management, including the Altar Valley Conservation Alliance Fire Management Plan and the Sonoran Desert Conservation Plan.

#### Fire Management

The discussion regarding fire and fire management in the text of the EA is inadequate and confusing. In light of rapidly changing fire regimes in this region resulting from climate change that are having a significant impact on resources across the region, the BLM must develop and articulate a meaningful fire management plan that, at a minimum, addresses the following questions:

- What are the different “specific fire strategies for differing Sky Island plant ecological sites?”<sup>41</sup> These strategies are not explained in sufficient detail anywhere in the document. At a minimum, this plan must include information regarding the “what and where” of each of these strategies.
- What reference material is used to justify statements that “full suppression or reducing large scale fires for lower Sonoran desert areas in Coyote Mountains” will “protect Sonoran desert plant ecology?”<sup>42</sup> How will this action be carried out? This statement, presented without any supporting references or information, makes no sense.
- What does “managed natural ignition” mean? This term is presented without explanation, and assumes without justification that the public will understand what the agency is referring to.

In general, the entire fire section is vague, poorly referenced and assumes the public understands terms and theories that are not well defined. Overall, it provides insufficient detail to understand what action is actually being proposed and where it is proposed to be implemented.

**Recommendations:** Active fire suppression should be confined to areas outside of the existing wilderness, and the first option should be to allow natural fire to burn in the wilderness areas. There should be no use of mechanical means to “manage” any fire within the wilderness boundaries. Mechanical tools can be used to suppress fires that threaten surrounding private lands and infrastructure but the agency should not use mechanical tools to manage controlled or prescribed burns. Finally, the background information, description of management actions related to fire ecology and management, and a meaningful assessment of the environmental consequences of those actions must be thoroughly and sufficiently articulated.

#### Wildlife and Wildlife Habitat, including Threatened and Endangered Species

The discussion and assessment of wildlife resources is wholly inadequate. For example, the objectives listed in the “Plan Summary”<sup>43</sup> do not even mention wildlife, and the Issues section<sup>44</sup> offers only an incomplete list of affected special status species, omitting the following species from consideration:

- Chiricahua leopard frog (*Lithobates chiricahuensis*)
- Mexican long-tongued bat (*Choeronycteris mexicana*)
- California Leaf-nosed Bat (*Macrotus californicus*)
- Cave Myotis (*Myotis velifer*)
- Mexican Long-tongued Bat (*Choeronycteris mexicana*)
- Spotted Bat (*Eudernia maculata*)
- Townsend’s Big-eared Bat (*Corynorhinus (Plecotus) townsendii*)

40 Available at <http://www.blm.gov/c100/sc10/>.

41 EA at 42.

42 *Id.*

43 EA at 5-6.

44 EA at 22.

- Great Plains Narrow-mouthed Toad (*Gastrophryne olivacea*)
- Lowland Burrowing Treefrog (*Smilisca fodiens*)
- Lowland Leopard Frog (*Lithobates yavapaiensis*)
- Sonoran Green Toad (*Bufo veniformis*)
- American Peregrine Falcon (*Falco peregrinus anatum*)
- Cactus Ferruginous Pygmy-Owl (*Glaucidium brasilianum cactorum*)

The full list of affected wildlife species is found in Appendix C, however, there are only incomplete descriptions of affected species in the actual document itself. Additionally, the document also fails to consider or discuss the implications of the recently proposed Critical Habitat designation for the jaguar, including 10,775 acres in Sub-unit 1a (Baboquivari-Coyote) and 1,591 acres in Subunit 1b (Southern Baboquivari).

There is virtually no direct reference to management wildlife resources in the description of the Proposed Action.<sup>45</sup> Despite this omission, the environmental consequences for Threatened and Endangered Species (T&E) are described as follows: “Efforts to enhance naturalness values and enhance existing monitoring program for T&E of each wilderness could reduce the net loss to existing species and may increase potential for former species to reestablish.”<sup>46</sup> This seems to imply that there will be some “efforts to enhance naturalness values and enhance existing monitoring programs” for T&E; however, it is entirely unclear exactly what those efforts will entail. The document also contains no information regarding the aforementioned monitoring plan, despite referring to it repeatedly throughout the document.

The document states that other wildlife and wildlife habitat may be impacted by the Proposed Action, specifically from proposed increases in access and associated increases in visitation,<sup>47</sup> but it fails to describe which species may be impacted and how they may be impacted. The document then makes the outrageous and wholly unsupported assertion that “legal visitors could help report undocumented immigration and smuggling and other border issue impacts that have impacts to wildlife and wildlife habitat, resulting in DHS border mitigation, thus helping reduce overall (illegal users) human impacts to wildlife.” Nothing in this ridiculous statement is supported by current reality, with DHS-funded mitigation projects few and far between and currently on indefinite hold, and no indication whatsoever from that agency that further mitigation will occur, or that if funds do become available, they will ever be directed to BLM Wilderness Areas. The idea that legal visitors will make any type of significant difference in the reporting of border issue impacts, or that border issue impacts to wildlife and habitat will somehow magically result in DHS border mitigation, is entirely unsubstantiated. This ridiculous attempt to cite wholly fictional mitigation actions as a way to downplay foreseeable impacts to wildlife species is insulting to the reader and is in clear violation of NEPA. It, and all similar references must be removed from this document.

The Plan also fails to provide current information about vegetation resources in the planning area, and is missing the most recent available data in this regard.<sup>48</sup> For example, the BLM needs to address management of plant species listed as sensitive by other agencies, not just those listed by BLM. A cursory review of “Arizona Rare Plant Field Guide” indicates BLM has missed a number of species listed as rare or sensitive, including:

- *Agave parviflora*
- *Agave amophysi*
- *Mammot devisiae*
- *Voquefina Californica ssp. Sonorensis*

<sup>45</sup> EA at 34.

<sup>46</sup> EA at 40.

<sup>47</sup> EA at 42.

<sup>48</sup> See e.g., Daniel F. Austin, *Baboquivari Mountain Plants: Identification, Ecology, and Ethnobotany*, University of Arizona Press, April 13, 2010.

According to one current reference, Pima Pineapple Cactus is not found in the Baboquivari or Coyote Mountains,<sup>49</sup> yet it is listed in the Plan. Lack of adequate reference material and the inclusion of incorrect information leaves the public to wonder what sources were consulted in developing the EA and calls into question whether the agency has used the best available information.

Regarding invasive and non-native weeds, increased monitoring is a valuable idea and one that is long overdue. However, this demands an increase in professional staff time and/or a well trained volunteer army. The need for increased education and enforcement cannot be understated. BLM must have a plan for informing, educating and monitoring the public in identification and elimination of invasive plants. Weed free hay and supplemental feed for livestock must be instituted in both wilderness areas.

Overall, this document provides very limited reference material outside the agency's own, largely incomplete, studies, and, like much of the rest of the analysis, fails to provide sufficient background information, adequate descriptions of management actions related to vegetation, and a meaningful assessment of the environmental consequences of those actions. As an example, the "environmental consequences" section on vegetation includes this completely erroneous statement: "Managed use of fire may benefit the lower elevations of Sonoran desert plant species of Coyote Mountains and the vegetation in the higher elevations."<sup>50</sup> There is no evidence presented to support this assertion.

**Recommendations:** The BLM must revise this document to incorporate the best available and most current science, and fully describe and assess impacts to all affected wildlife and vegetation species from all management actions described in the draft plan, including grazing management activities, the proposed increases in legal access, and the foreseeable illegal use of both wilderness areas by undocumented migrants and the US Border Patrol. The BLM must also provide a sufficiently robust monitoring plan, which is currently missing. Finally, the BLM must have a plan for informing, educating and monitoring the public in identification and elimination of invasive plants, and the agency should institute weed free hay and supplemental feed requirements for livestock within both wilderness areas.

#### **Water Resources**

The draft plan proposes the following action: "Coordinate with the Arizona Game and Fish Department [AGFD] to monitor the condition of the 1983 wildlife water development in Coyote Mountains Wilderness. Complete a water development inventory and status report. Water development should be maintained to support the wildlife that depends on it."<sup>51</sup> We disagree with this management action. Over the last fifteen years, we have repeatedly asked the BLM and AGFD to inventory and assess wildlife water developments on BLM National Conservation Areas (NCAs), Wilderness Areas, and Monuments, and to develop comprehensive plans in coordination with the conservation community, not just the hunting community, for the monitoring, management, development or removal of wildlife water developments. The current approach is inadequate to determine the effectiveness of and the necessity for these developments, especially in wilderness areas.

**Recommendations:** All water sources must be inventoried and assessed using robust methodology such as the Springs Ecosystem Assessment Protocol developed at the Springs Stewardship Institute.<sup>52</sup> We support ongoing efforts in this regard. A monitoring and management plan with specific methods and timelines must be presented in the final Plan. We repeat our recommendation that the BLM and AGFD inventory and assess wildlife water developments on BLM NCAs, Wilderness Areas, and Monuments, and to develop comprehensive plans in coordination with the conservation community, not just the

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49. *Id.*

50. EA at 42.

51. EA at 35.

52. See [springstewardship.org](http://springstewardship.org).

hunting community, for the monitoring, management, development or removal of wildlife water developments.

#### Access and Recreation

The EA states that, while it is estimated that most hiking and rock climbing groups number at around 15 people, "some local hiking clubs are reported to hike in group sizes up to 50 people."<sup>53</sup> In light of this, and the estimate that overall visitation will grow as the surrounding population increases,<sup>54</sup> we support the proposal to limit visitation to a maximum of 10 people and six pack animals. If these limits are implemented and enforced, we support the proposal to add two additional access points to the wilderness areas.

However, we question the feasibility of enforcing these limitations, particularly as that enforcement is described in the following proposed action: "Monitor compliance of the recommended group size through a volunteer wilderness stewardship program that reports to the BLM Field Manager and wilderness staff."<sup>55</sup> No information is provided as to the actual feasibility of this proposal or availability of such a stewardship program. In addition, funds appropriated for increased enforcement are unlikely in the current political climate, as are funds for the purchase of public easements to create additional access points. Given limitations on enforcement, as well as inadequate funding for increased enforcement activities, it seems the agency would be better off foregoing the implementation of new access points.

Should the BLM increase access to these wilderness areas, it will likely result in increased use by individuals looking for a wildlands adventure, including potential incursion by organized trail running groups and mountain bikes. However, the Plan does not address this foreseeable impact, including details regarding how mountain bikes will be controlled, monitored, and how the wilderness rules regarding these vehicles will be enforced. The BLM must look at this potential issue and the impacts that may result.

While rock climbing is generally an acceptable activity in wilderness areas, we support a ban on commercial guided rock climbing in the Baboquivari Wilderness and agree that there should be no guided trips and no groups over ten people. In addition, we want to emphasize that the use of any type of mechanized drills, including electric and hand-drills, is a violation of the Wilderness Act and must be prohibited, with those restrictions enforced.

**Recommendations:** We generally support access limits restricting visitation to a maximum of 10 people and six pack animals. However, we cannot support the creation of additional access points unless these limits are implemented and enforced, which seems unlikely. Should those additional access points be created, we recommend the BLM assess the potential impacts of mountain biking in these wilderness areas. The BLM must enforce the prohibition on using any type of mechanized drills, including hand drills, in designated wilderness.

#### Livestock Grazing

The document contains little useful information regarding livestock grazing or its impacts on these wilderness areas and their associated resources. Information contained in the Plan and associated analysis should be reviewed for consistency with other internal reports, current monitoring data, and the most recent information about the distribution of imperiled species within the planning area as it relates to livestock grazing in the wilderness areas.<sup>56</sup>

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<sup>53</sup> EA at 22.

<sup>54</sup> EA at 23.

<sup>55</sup> EA at 36.

<sup>56</sup> See e.g. US Fish and Wildlife Service, *Annual Report on Programmatic Biological Opinion for the Safford and Tucson Field Offices' Livestock Grazing Program, Southeastern Arizona*, January 1, 2011 – December 31, 2011.

Recommendations: We support closure of Baboquivari, Hay Hook grazing allotments as both are terminated and/or have been in non-use for over seventeen years.<sup>57</sup>

**Conclusion:**

Overall the analysis of environmental consequences resulting from the proposed action is riddled with conclusory remarks and unsupported statements that do not provide the reader with sufficient information to understand and comment on this proposal. In addition to all the recommendations discussed above, we strongly encourage the BLM to revise this analysis so that it fully and meaningfully complies with all applicable rules, regulations, and agency policies.

Thank you for your consideration of our comments on this proposal. Please continue to include SIA as an interested party on this matter and direct all future public notices and documents to Jenny Neeley, Conservation Policy Director & Legal Counsel, at the address above.

Sincerely,



Melanie Emerson  
Executive Director



Jenny Neeley  
Conservation Policy Director

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<sup>57</sup> EA at 24.

## BLM Response to the Sky Island Alliance

The BLM Tucson Field Office appreciates comments from the Sky Island Alliance (SIA) on the Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan.

On page two, the assertion is made that the BLM is required to host a minimum of one meeting, workshop or open house which must be open to the general public; and that the information contained in this document does not consider significant and relevant data in the intervening time since initial public scoping. Further, SIA observed that the public must be given at least 45 days to comment upon the draft wilderness management plan, when the BLM had initially opened the comment period for 30 days.

- Please refer to Appendix A, for documentation of five initial meetings with interested and affected parties. The preparers of this document have been engaged in on-going review for relevancy of issues. It has been determined that issues addressed in this plan are current. Administrative records regarding involvement or input into the document are on file at Tucson Field Office and Arizona State Office. In 2010, the BLM began a long-term monitoring effort based on the statutory requirements of the Wilderness Act of 1964. This monitoring effort will assess trends in wilderness character.
- The BLM made an error initially in setting up a 30-day comment period. According to BLM Manual 8561, wilderness management plans should be available for comment for 45 days. The BLM Tucson Field Office extended the comment period for an additional 15 days in order to meet this requirement.

On page four, the organization states that the wilderness management plan and environmental assessment only considers a single action alternative in addition to the required “No Action” alternative, violating both the NEPA and BLM’s policies. The Sky Island Alliance requests that alternative management actions that should be included in this plan and EA include consideration of alternative fire regimes.

- Section 8.3.4.2 in BLM NEPA Handbook H-1790-1, states that alternatives in an environmental assessment states “there are no unresolved conflicts concerning alternative uses of available resources if consensus has been established about the proposed action based on

input from interested parties, or there are no reasonable alternatives to the proposed action that would be substantially different in design or effects.”

- The proposed action meets the purpose and need. Therefore additional alternative fire regimes do not need to be analyzed according to NEPA policy. The Gila District Fire Management Plan is integrated and includes objectives for the two wilderness areas.

Further, on page four, SIA requests that the BLM considers including the 2,224 acres of wilderness-suitable lands mentioned under the description of the “Affected Environment” into adjacent designated wilderness.

- Wilderness management plans only address wilderness areas designated by Congress. The 2,224 acres referred to was also known as unit 2-203A (Baboquivari Peak North) was included in the initial intensive wilderness inventory but was dropped from further analysis in 1980. However, this area does contain wilderness character and could be re-inventoried in the future.

On page five, the SIA asserts the wilderness management plan must be tiered to the goals, objectives and actions described in the NLCS Science Strategy.

- In fact, this plan must be tiered to the Phoenix Resource Management Plan per BLM policy and NEPA guidelines. The BLM believes that the Baboquivari Peak Wilderness and Coyote Mountains Wilderness –Management Plan is wholly consistent with the [NLCS Science Strategy](#).

On page six, the SIA requests that the BLM must develop and articulate a meaningful fire management plan and that the BLM articulate, through this plan, specific fire strategies for differing Sky Island plant ecological sites, and document reference material that is used to justify statements such as, “full suppression or reducing large scale fires for lower Sonoran Desert areas in Coyote Mountains” will “protect Sonoran desert plant ecology.”

- The 2010 Gila District Fire Management Plan is the guiding document on fire management, including, the Baboquivari Peak Wilderness and the Coyote Mountains Wilderness and BLM lands within the Altar Valley. This plan is a wilderness management plan and not a fire

management plan. The wilderness program can only provide guidance on how to manage the wildland fire suppression.

- Text has been modified on page 42 to articulate that the full NEPA analysis for fire management actions are analyzed in 2010 Gila District Fire Management Plan.

On page six, the organization asserts that the discussion and assessment of wildlife resources is wholly inadequate. There is no reference to wildlife resources in the description of the proposed action.

- Wildlife is managed by current BLM policy and is therefore not a specific issue in this plan. The BLM has added a general heading about wildlife management under Issues Solved through Policy or Administrative Action. Text has been modified on page 30 to say the BLM will determine in cooperation, with the AGFD and USFWS the potential of terrestrial and aquatic habitat to support wildlife, including special status species.

On page seven, the organization states that this document fails to consider or discuss the implications of the recently proposed Critical Habitat designation for the jaguar including 10, 775 acres in sub-unit 1a (Baboquivari-Coyote) and 1,591 acres in sub-unit 1b (Southern Baboquivari).

- The BLM prepared a Biological Assessment of the wilderness plan as required by law which received a concurrence letter from US Fish and Wildlife Service. Please refer to this document in Appendix D.

On page seven, the organization disagrees with the BLM's statement that "legal visitors could help report undocumented immigration and smuggling."

- There is considerable anecdotal information from the public and law enforcement agencies that the above statement is true, the BLM has modified its text on page 41 of this document.

On page eight, the statement is made that the Pima pineapple cactus is not found in the Baboquivari or Coyote Mountains.

- The Biological Assessment conducted on this plan and USFWS concurrence, states that there is a population of Pima pineapple cactus in the Coyote Mountain Wilderness.

On page eight, the organization requests that the BLM must have a plan for removing and monitoring of invasive and non-native weeds.

- This is outside of the scope of the wilderness management plan. Detailed plans for removing invasive species are programmatic actions and do not fall under the National Environmental Policy Act. Impacts from invasive species removal will be analyzed in detail after the above-mentioned project plans are drafted.

On page eight, the organization states that the BLM must revise this document to incorporate the best available and most current science, and fully describe and assess impacts to all affected wildlife and vegetation species from all management actions described in the draft plan. The BLM must also provide a sufficiently robust monitoring plan, which is currently missing.

- As the proposed actions are implemented, the BLM will fully analyze the impacts to affected environmental elements on a project-specific basis.
- "The BLM Arizona State Office's Threatened and Endangered Species Specialist maintains the statewide

- monitoring plan protocol and monitoring schedule for affected elements within these two wilderness areas. Staff refers to this plan on an ongoing basis.

On page eight, the SIA asserts that all water sources must be inventoried and assessed using robust methodology such developed by the Springs Stewardship Institute.

- Implementations of these actions are, in fact, contained in the Water Resources section and Wilderness Implementation Schedule. Current BLM guidance does not require that specific methodology and timeline be presented for water

resources in final wilderness plans.

On pages 8-9, the SIA repeats their “recommendation that the BLM and AGFD inventory and assess wildlife water developments on BLM NCAs, Wilderness, and Monuments, and to develop comprehensive plans in coordination with the conservation community, not just the hunting community, for the monitoring, management, development or removal of wildlife water developments.”

- The BLM will inventory and assess water developments on a case-by-case basis for repair, removal or maintenance.

Bureau of Land Management  
Attn: Jim Mahoney  
1763 Paseo San Luis  
Sierra Vista, AZ 85635  
October 16, 2012

Dear Mr. Mahoney:

I have reviewed the Draft Wilderness Management Plan and Environmental Assessment for the Baboquivari Peak Wilderness and Coyote Mountain Wilderness and would like to offer the following comments.

The addition of a small map locating these mountain ranges in relation to the Altar Valley, the Tohono Reservation, the Mexican border, Highway 286 and Highway 86 (Ajo Road) would orient a reader not familiar with the area. The maps included show the wilderness boundaries but not the relation of the wilderness to the surrounding areas.

In respect to the management of these two areas, my major concern for many years has been the lack of public access. Currently there is "privileged" access. It is my understanding that access to Thomas Canyon is denied to hunters but birders and photographers generally are permitted. At one time the Baboquivari Mts. provided some of the best lion hunting in the state. The US Fish and Wildlife Service controls access to Brown Canyon with a locked gate. The Elkhorn Ranch, a well-advertised guest ranch, has a Special Recreation Permit that allows them to use the area for their riding program - a commercial use (they also have a grazing permit for the eleven horses used in the program).

I would suggest that one management alternative would be closure of the areas to ALL recreational users until public access is provided for all users, not just a few select groups. Access to these areas has been identified as essential in many Bureau of Land Management (BLM) documents going back into the early-eighties. I have reviewed the Phoenix Final Wilderness Environmental Impact Statement (released March 30, 1987). The Baboquivari and Coyote Mountains were included in this document. The planning process began in 1982 and there was a formal meeting on a draft held here in Tucson in January of 1985. Access was one of the "issues". I am aware of the many impediments, including budgetary, there have been but twenty-six years later no progress has been made addressing the issue. I will reiterate, in fairness to all public land users, close the area to recreational use until such a time as there is a legal solution to the access problem.

I assume that the document will be edited, including for spelling errors. However, I am taking the liberty of pointing out some errors that I noted:

- Page 21: Anvil Ranch - both "Anvil Ranch" and "King Anvil Ranch" are used in various places throughout the document. I believe it is ordinarily referred to as the "King's Anvil Ranch."

- Page 41 includes discussion about the potential of invasive plants and noxious weeds being introduced and steps being taken to remove them when found. On page 36 mention is made that a permitted group activity could be authorized to use up to 6 pack animals. What steps will be taken to ensure that these pack animals do not introduce noxious weeds? If animal feed is to be carried in to the wilderness, will there be a requirement for certified as weed free feed?
- Page 41, last complete paragraph, line 7: SNuggling activity? Was the intent sMuggling? I'm not sure what legal authority the BLM has in reference to snuggling.
- Page 55 Appendix D: Left hand column, 2nd paragraph: "3 vehicles per parking area" (also on page 20). Right hand column 2nd paragraph, referring to parking area: "no more than 5 vehicles" Is this inconsistency intentional?
- Page 49 Bibliography: Many recent BLM documents cite this section as REFERENCES. Several of the listings may be incomplete or undated. 1989 - What agency published the Mineral Resources of the area, USGS, BLM? I believe that there is a much more recent MOU between Arizona Game and Fish and the BLM.
- Page 61: Second paragraph appears to be the same as the last section of Paragraph 1.

Thank you for the opportunity to provide comments.

Sincerely,

/signed/

Frances W. Werner  
 3216 N. Jackson Ave.  
 Tucson, AZ. 85719-2433

## **BLM Response to Frances W. Werner**

The BLM Tucson Field Office appreciates the comments of Ms. Frances W. Werner on the Draft Baboquivari Peak Wilderness and Coyote Mountains Wilderness – Wilderness management Plan and Environmental Assessment.

On Page one, paragraphs three and four, Ms. Werner recommends the BLM close access to these wilderness areas to all recreational visitation until such a time when legal public access is, or is not, acquired.

- The BLM Tucson Field Office is bound by law and policy to ensure that these two wilderness areas are open to the public. The Wilderness Act of 1964 and the Arizona Desert Wilderness Act of 1990 specifically recognizes that Baboquivari Peak Wilderness and Coyote Mountains Wilderness have “outstanding opportunities for solitude or a primitive and unconfined type of recreation.” And in Section 2(c) of the Wilderness Act, “shall be devoted to the public purposes of recreation, scenic, scientific, educational, conservation and historic use.” In Section 4 (b) the Act states that the managing agency, in this case the BLM Tucson Field Office, “shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character.”

Negotiations for, and acquisition of, legal public access to Baboquivari Peak Wilderness and Coyote Mountains Wilderness is a proposed action item in the wilderness management plan. Every effort will be made to accomplish this task. However, in the interim, by law the BLM Tucson Field Office may not infringe upon legitimate use and enjoyment of these wilderness areas.

On page two, paragraph one, Ms. Werner questions whether as a result of this plan, the use of certified weed-free feed will be required of livestock in these two wilderness areas.

- The BLM Tucson Field Office recognizes the importance of preventing noxious and exotic vegetative species from becoming established in these two wilderness areas. The decision to require weed-free feed is contained in this document. We understand that in some cases these products are difficult to obtain or cost-prohibitive, and that livestock owners must do

their best to comply with the spirit and letter of this proposed action item.

On pages one and two, several corrections are suggested pertaining to spelling, grammar and usage of language.

- The BLM Tucson Field Office appreciates Ms. Werner’s observations and has made corrections where appropriate.

## Glossary

**Accepted Uses:** see “Special Uses”

**Allotment:** A land area where one or more operators’ livestock graze. It generally consists of public land but may include parcels of private and state-owned lands. The number of livestock and the season of use are stipulated for each allotment.

**Allotment Management Plan (AMP):** A BLM livestock grazing management plan for a specific allotment, based on multiple use resource management objectives. The AMP considers livestock grazing in relation to other uses of the range and in relation to renewable resources—watershed, vegetation, and wildlife. An AMP establishes the seasons of use, the number of livestock to be permitted on the range, and the rangeland developments needed.

**Appropriate Management Response (AMR):** Any specific action suitable to meet fire management objectives.

**Animal Unit Month (AUM):** The amount of forage needed to sustain one cow or a cow and calf under six months of age for one month.

**Commercial:** For profit, attempted profit, salary, increase in business or financial standing, or for support of activities from amounts received or services rendered in connection with the permitted activities.

**BLM:** Bureau of Land Management, a Department of the Interior land management agency.

**CBP:** United States Customs and Border Protection-Department of Homeland Security.

**CBP-BP:** United States Customs and Border Protection, Border Patrol-Department of Homeland Security.

**Cultural Resources:** Those fragile and nonrenewable remains of human activity, occupation, or endeavor (reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture, and natural features) which were of importance in human events. These resources consist of (1) physical remains, (2) areas where considerable human activities occurred—even though evidence of the event no longer remains, and (3) the environment immediately surrounding the actual resource.

**DHS:** Department of Homeland Security.

**Ecosystem:** The organisms of a particular habitat together with the physical environment in which they live; a dynamic complex of plant and animal communities and their associated non-living environment.

**Environmental Assessment (EA):** The procedure for analyzing the impacts of some proposed action on a given environment and the documentation of that analysis.

**Habitat:** A specific set of physical conditions that surround a single species, a group of species, or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover, and living space.

**Leave No Trace:** A national land use ethics program promoting and inspiring responsible outdoor recreation through education, research and partnerships. *Leave No Trace* builds awareness, appreciation and respect for wildlands.

**Mechanical Transport:** Any vehicle, device, or contrivance for moving people or material in or over land, water, snow, or air that has moving parts. This includes, but is not limited to, sailboats, sailboards, hang gliders, parachutes, bicycles, game carriers, carts, and wagons. The term does not include wheelchairs, nor does it include horses or other pack stock, skis, snowshoes, non-motorized river craft including, but not limited to, drift boats, rafts, and canoes, or sleds, travois, or similar devices without moving parts.

**Minimum Requirement:** An action that is determined to be absolutely necessary but results in the least discernible impact on all the wilderness values and is the least manipulative or restrictive means of achieving a management objective in wilderness. This represents the “why” and “is it necessary” questions that must be answered before deciding that an action, that could potentially leave a mark of human influence in Wilderness, is necessary.

**Minimum Tool:** The least impactful method, equipment, device, force, regulation, practice, or use that will meet the management objective in a wilderness context. This represents the “how” question that must be asked to ensure that the process to implement the minimum required action will minimize impact on social and biophysical wilderness values. Minimum tool is not synonymous with primitive tool. In some cases the minimum tool could be a motorized tool or a form of mechanical transport.

**Motor Vehicle:** Any vehicle which is self-propelled or any vehicle which is propelled by electric power obtained from batteries.

**Motorized Equipment:** Any machine that uses or is activated by a motor, engine, or other power source, except shavers, wrist watches, clocks, flashlights, cameras, camping stoves, cellular telephones, radio transceivers, radio transponders, radio signal transmitters, ground position satellite receivers, or other similar small hand held or portable equipment.

**Non-conforming uses:** see Special Uses.

**Non-consumptive uses:** Generally defined as fish and wildlife protection, scenic enjoyment, recreation, and preservation of natural characteristics.

**Plutons:** A large body of igneous rock formed when magma is injected into the surrounding (country rock) and crystallizes.

**Practicable:** Possible to practice or perform, capable of being used, (not to be confused with practical).

**Primitive Recreation:** Non-motorized and non-developed types of outdoor recreation (hiking, backpacking, camping, and hunting).

**Proper Functioning Condition (PFC):** PFC assessment is a qualitative method for assessing the condition of riparian areas. The term PFC is used to describe both the assessment process and on- the-ground condition of a riparian area. Assessments refer to a consistent approach for considering hydrology, vegetation, erosion/deposition attributes.

**Public Land:** Federal lands administered by the BLM.

**Range Improvement:** A structure or development associated with a grazing allotment.

**Resource Management Plan (RMP):** A BLM planning document that presents systematic guidelines for making resource management decisions for a Field Office. An RMP is based on an analysis of an area's resources, their existing management, and their capability for alternative uses. RMP's are issue-oriented and developed by an interdisciplinary team with public participation.

**Scoping:** An early and open process for identifying the significant issues to be addressed in a management plan. Scoping may involve public meetings, field interviews with representatives of agencies and interest groups, discussions with resource specialists and managers, and written comments in response to news releases, direct mailings, and articles about the proposed action(s) and scoping meetings.

**Sensitive Species:** Species not yet officially listed but that are undergoing status review for listing on the USFWS's official threatened and endangered list; species whose populations are small and widely dispersed or restricted to a few localities; and species whose numbers are declining so rapidly that official listing may be necessary.

**Sky Island:** A mountain range in southern Arizona and northern Mexico that contain a diverse amount of animal life and plant communities.

**Special Status Species:** Plant or animal species listed as threatened, endangered, candidate or sensitive by State governments or the federal government.

**Special Uses:** Often called "Accepted Uses" or "non-conforming uses." Uses allowed by the Wilderness Act of 1964 that were in existence prior to wilderness designation and not necessarily compatible with

preserving wilderness values (e.g., mining, livestock grazing, and range or wildlife development maintenance).

**Split Estate:** Broadly speaking, split estate may take many different ownership forms. However, BLM policy applies only to situations where surface rights belong to private individuals while the rights to oil and natural gas resources are publicly held and managed by the federal government.

**Tohono O'odham:** Native North Americans who traditionally inhabited the desert regions of present-day Arizona and northern Sonora, Mexico.

**Untrammelled:** Not confined, not restrained, free from hindrances. Source: American Heritage Dictionary.

**Visual Resource Management (VRM):** A process used by the BLM to identify and manage the quality of the visual environment and to reduce the visual impact of development activities

**Wilderness Dependent:** Dependent on the wilderness conditions of naturalness, solitude, and special features unique to the area.

## Bibliography

1987 *Final Phoenix Wilderness EIS*

1988. *Phoenix Resource Management Plan and Final Environmental Impact Statement*. Phoenix Field Office.

1990. *Arizona Desert Wilderness Act of 1990*. Public Law 101-628. 101<sup>st</sup> Congress. Washington, D.C.

1995. Maricopa Complex Wilderness Management Plan, Environmental Assessment and Decision Record. Phoenix District Office.

2005. Final Upper Burro Creek Wilderness Management Plan and Environmental Assessment and Finding of No Significant Impact/Decision Record. Kingman Field Office.

2000. Cultural Report P'ittoi Home. BLM Tucson Field Office.

1987. Arizona Game and Fish Commission and Bureau of Land Management (BLM). *Master Memorandum of Understanding between State of Arizona, Arizona Game and Fish Commission, and Department of the Interior, Bureau of Land Management*.

1982. Brown, David E., ed. Biotic Communities of the American Southwest-United States and Mexico. *Desert Plants* (4):1-4.

2012. BLM Manual 6430. *Management of Designated Wilderness areas*. Washington, D.C.

1984. BLM Manual 8561. *Wilderness Management Plans*. Washington, D.C.

2000. 43 CFR Parts 6300. Wilderness Management; Final Rule. *Federal Register* 65(241):78358-78376.

1993. Federal Aviation Administration (FAA). *Interagency Agreement between National Park Service, Fish and Wildlife Service, Bureau of Land Management, and Federal Aviation Administration*.

U.S. Congress. 1964. *Wilderness Act*. Public Law 88-577. 88<sup>th</sup> Congress.

1969. *National Environmental Policy Act, as amended*. Public Law 91-190. 91<sup>st</sup> Congress.

1970. *Clean Air Act, as amended*. Public Law 91-604. 91<sup>st</sup> Congress.

1976. *Federal Land Policy and Management Act*. Public Law 94-579. 94<sup>th</sup> Congress.

1989. *Mineral Resources of the Coyote Mountains and Baboquivari Peak Wilderness Study Areas, Pima County, Arizona*. Washington, D.C.

2006. MOU Border Patrol and federal agencies. A Memorandum of Understanding (MOU) among U.S. Department of Homeland Security, U.S. Department of the Interior and U.S. Department of Agriculture regarding cooperative national security and counter-terrorism efforts on federal lands along the United States' borders was signed in March 2006. [Memorandum of Understanding \(MOU\) among U.S. Department of Homeland Security, U.S. Department of the Interior and U.S. Department of Agriculture](#)

Interior West – Our Living Resources. National Biological Service, Natural Resource Laboratory. Colorado State University, Fort Collins, CO 80523

Southwestern Sky Island Ecosystems, by Peter Warshall, University of Arizona.

[http://biology.usgs.gov/status\\_trends/static\\_content/documents/olrdocs/Interior.pdf](http://biology.usgs.gov/status_trends/static_content/documents/olrdocs/Interior.pdf)

1995. *Interagency Wilderness Strategic Plan*.

2000. *Desktop Reference Guide to Collaborative Community Based Planning: A joint effort between the Bureau of Land Management (BLM) and the Sonoran Institute, summarizes important principles of collaboration*.

[Comprehensive Resource for Wilderness](#)

<http://leopard.Wilderness.net/>

[Leave No Trace Organization](#)

(Biological Opinion - 2-21-96-F-160 - Safford and Tucson Field Offices' Grazing Program, September, 1997).

<http://www.fws.gov/southwest/es/Arizona/Biological.htm>

## Appendix A – Planning and Scoping

This Baboquivari Peak Wilderness and Coyote Mountains Wilderness Planning effort included traditional and non-traditional planning elements.

Traditional BLM wilderness planning guidance is found in: Title 43, Code of Federal Regulations, Part 6300 (43 CFR 6300) and BLM Manuals 6340 and 8561.

In 2000, the BLM Tucson Field Manager selected a relatively new concept in THE BLM named “Collaborative Community-Based Planning” to develop this wilderness plan. This approach was intended to be the framework for the entire planning process however, this process proved suitable only for the initial public scoping meetings to gather issues and concerns.

The first public meeting for this wilderness plan was a potluck lunch, held in Three Points, Arizona in 2000. After the initial meeting, the public was asked to select desired dates, times and places to hold the next series of meetings. Diverse participation was encouraged and included members of the Tohono O’odham Nation, Altar Valley residents, neighbors, wilderness visitors and other interested citizens. The interested public that attended the initial meetings were considered the “Public Planning Group.”

The Public Planning Group provided 60 comments and concerns, and then a smaller working group volunteered to categorize the statements and concerns into wilderness issues.

This small working group met several times to prepare for the April 8, 2000, and present the categorized comments and concerns. Meeting notes were sent out to all on the mailing list and were available on the BLM website for over a year.

The public was encouraged to assist in the development of the entire document, but the challenge to develop a new wilderness outline in lieu of referencing the BLM’s traditional planning manuals and handbooks became difficult, and the Public Planning Group decided that the BLM should complete this wilderness plan.

The BLM Wilderness staff reviewed the 59 public comments and issue statements and found that several comments and issue statements could not be refined into a wilderness issue, therefore were categorized as “issues beyond the scope of the plan” or were comments that could not be analyzed further or were summarized into the four main wilderness issues. Also, it was noted that

several wilderness issues were overlooked during the initial public meetings and are summarized in this document. The BLM subsequently completed the plan using the guidance found in BLM Handbook H-8560-1, The Arizona Outline for Wilderness Planning and with Tucson National Environmental Policy Act (NEPA) review team.

Unedited Comments and Concerns Gathered at Public Meetings on:

- 1-22-2000 in Three Points, Arizona
- 2-12-2000 in Tucson (U of A Farm)
- 7-29-2000 in Brown Canyon, Buenos Aires NWR
- 2-26-2000 in Topawa, Arizona
- 9-23-2000 in Three Points Arizona

### **CULTURAL RESOURCES**

1. Maintain spirituality of Baboquivari Peak Wilderness.
2. Concerns of the Tohono O’odham Nation for protection of cultural resource sites in both Wilderness areas- Respect for cultural & traditional sensitivities of the wilderness.
3. Respect for the Tohono O’odham Nation & their land and their beliefs about land.
4. Needs to be a broad view of sacredness and recognition that people see sacredness differently.

### **ARCHAEOLOGY & PREHISTORY**

5. Protection of archaeological resources.
6. Concern about archaeological surveys and protection of these sites.

### **RECREATION – GENERAL**

7. Maintaining a wilderness experience for all people.
8. Wilderness experience preserved while allowing historical uses (climbing, hiking, etc.).
9. Maintain recreation access while respecting the cultural and natural resources of the site.
10. Permits within both wildernesses.
11. No user fees for east side for camping or access to wilderness.
12. Trail improvements from Brown Canyon to the saddle to prevent further environmental damage - No defined boundaries marked on the ground.

### **ROCK CLIMBING**

13. Assure technical rock climbing access.
14. The existing prohibition of motorized equipment is sufficient restriction as it relates to climbing equipment & minimum tool concept

### **HUNTING**

15. Keep area open for hunting. Areas have been opened traditionally.
16. Wilderness areas remain open to hunters, without limited access.

17. Access to Mendoza Canyon year round instead of just hunting seasons.
18. Use of hunting dogs.

#### **ACCESS**

19. Continued year round free & open and sensible access to the high point peak for visitors of both wilderness areas.
20. What will access to “access” to the wilderness be?
21. Thanks to BLM & the Humphreys for public involvement & access to wilderness.
22. Keeping access for emergency use to the areas (i.e., helicopters).
23. What detriment would be incurred from Tohono O’odham view if the public allowed continued use?

#### **MINING**

24. Non-consumptive use should be open to everyone (i.e. instead of hunting, mining, grazing).

#### **GRAZING**

25. Concerned about grazing allotment on North side of Baboquivari and to maintain it. Maintain all grazing allotments.
26. Overuse of wilderness area by cattle, etc., not trampled.

#### **WATERSHED – VEGETATION, SOIL, WATER, AIR**

27. Preservation of wilderness area in natural state.
28. Assure that wilderness is preserved in its natural form.
29. Controlled and managed use of fire in wilderness areas.
30. Develop long-term monitoring of wilderness for natural resources, i.e., vegetation, etc.
31. Watershed coordination management with all land owners.

#### **WILDLIFE AND THREATENED AND ENDANGERED SPECIES (ALL BIOTA)**

32. Protection of plants and animals, including Threatened & Endangered species.

#### **EDUCATION/INTERPRETATION**

33. Government should increase commitments to “Leave No Trace” land use ethics.
34. More education & communication is needed so everyone understands values of the different people involved.
35. People who write (this) plan understand impacts to the Tohono O’odham Nation.
36. Education regarding the sovereign status of O’odham nation for others is needed.
37. Educate the public about the real reason for the designation of the wilderness.
38. Education of the public on the sacredness of the peak.
39. Concerns about the saving the involvement of youth in the sacredness of Baboquivari Mountains - Conviction of the youth that it is a sacred place.

40. Media doesn’t need to present the issue as decisive. They are compatible.

#### **ADJACENT LANDS**

41. Concerns for development and encroachment, adjacent to boundaries of wilderness area and affect to the management of wilderness areas.
42. Concerns about economic development in the area surrounding and alternatives.
43. Needs to be more consultations from the state with all the land owners regarding development.
44. Concern about state land usage in surrounding area. There is no state land mandate protecting their (state) land.
45. What affect does deed and state land have on the area?
46. Property rights of adjacent land owners should be respected (Tohono O’odham Nation, private, etc.).
47. Concern about major power line near wilderness.
48. Will have track route with additional traffic from Mexico.

#### **LAND STATUS**

49. Transfer federal land status of Baboquivari Peak to the Tohono O’odham Nation.

#### **PLANNING PROCESS EDUCATION & ON-THE-GROUND MANAGEMENT**

50. How is the enforcement of the area handled when the management plan is adopted?
51. Concerns about reinventing what we’ve gone through this process before.
52. To assure that the Tohono O’odham Nation is included in management process spiritually, culturally & traditionally.
53. Control of Resource kept in U.S. Government
54. Management to remain as it is now (BLM eastside, Tohono O’odham Nation west side).
55. The concern of who would better manage the, area and join efforts and what are differences between nation and BLM.
56. The plan should be generic rather than specific.
57. Develop a forward looking plan that will consider as many future scenarios.
58. What impact is U.S. Border Patrol going to have in wilderness areas?
59. Plan provides for potential illegal immigrants issues (i.e., what type of patrols).
60. Military has a lack of respect for Baboquivari Peak.

## Appendix B – Soil Survey

The USDA NRCS Level 3 soil survey report and evaluation The three primary soil mapping areas (70, 204, 205) delineated in the Baboquivari Peak Wilderness and the Coyote Mountains Wilderness are:

### **70 Cortaro-Rock outcrop-Faraway complex, 15 to 45 percent slopes.**

This unit occurs on moderately steep to steep granitic hills and mountains. These are shallow well drained soils formed from granite, gneiss, and schist. The surface layer is usually covered with 50 to 65 percent gravel and cobbles. The depth to bedrock ranges from five to 20 inches. Permeability is moderately rapid, but available water capacity is very low. The effective rooting depth is less than 20 inches, although roots and water may be in fractures to a depth of 60 inches or more. Runoff is very rapid, and the hazard of water erosion is moderate to severe.

Rock outcrop consists of exposures of barren rock that occur as ledges, massive boulder piles, and near vertical cliffs that are extremely resistant to weathering. The soil and areas of rock outcrop are intricately intermingled; however, a higher percentage of rock outcrops is in areas near the mountaintops.

The potential plant community is mainly sideoats grama, plains lovegrass, bullgrass, and scattered oaks. The present plant community is mainly white and Emory oaks, Mexican pinyon, alligator juniper, and manzanita, with an understory of silktassel, datil yucca, shrubby buckwheat, and perennial grasses.

Although this complex produces adequate forage for yearlong use, steepness of slope, rocky surfaces, and areas of rock outcrop limit access and result in poor livestock distribution. The area is best utilized in the cooler winter months. Prescribed burning helps improve grazing distribution and generally improves vegetation condition by decreasing trees and shrubs while increasing the perennial grass component.

This complex is poorly suited to recreation development due to the steepness of slopes. Paths and trails should be restricted to the contours where possible.

### **204 Lamshire-Pantak-Rock outcrop complex, 25 to 60 percent slopes**

This unit occurs on moderately steep to steep hills and mountains. These are shallow well drained soils formed

from andesite. Typically the surface layer is very gravelly sandy loam. The depth to bedrock ranges from four to 20 inches. Permeability is moderate, but available water capacity is very low. The effective rooting depth is less than 20 inches. Runoff is very rapid, and the hazard of water erosion is moderate to severe.

Rock outcrop consists of barren rock that occurs as ledges, massive boulders, and near vertical cliff. The higher percentage of rock outcrop occurs near the mountaintops.

The potential plant community is shrubby buckwheat, ocotillo, and jojoba with warm-season perennial grasses consisting of sideoats grama, plains lovegrass, bullgrass, scattered oaks. The present plant community in heavily grazed areas is mainly mesquite, curly mesquite, shin-dagger agave, prickly pear cactus and snakeweed.

Although this complex produces adequate forage for yearlong use, steepness of slope, rocky surfaces, and areas of rock outcrop limit access and result in poor livestock distribution. The area is best utilized in the cooler winter months. Prescribed burning and brush control helps improve grazing distribution and generally improves vegetation condition by decreasing trees and shrubs while increasing the perennial grass component. Deferment of grazing during the summer growing season is necessary to maintain vigor and production of the perennial grasses.

### **205 Far-Spudrock-Rock outcrop complex, 35 to 85 percent slopes**

This unit occurs on moderately steep to very steep slopes of mountains. These are shallow well-drained soils formed from granite and gneiss. The surface layer is usually a fine sandy loam often covered with a mat of oak and pinyon litter about one inch thick. The depth to unweathered bedrock ranges from 20 to 40 inches. Permeability is moderately rapid, but available water capacity is very low. The effective rooting depth is 20 to 40 inches. Runoff is very rapid, and the hazard of water erosion is severe.

Rock outcrop consists of areas of exposed granite and gneiss in the form of ledges, boulders larger than 10 feet in diameter, and vertical cliffs. Rock outcrop also includes areas where depth to bedrock is less than four inches, or areas near the mountaintops.

The potential plant community is generally the present plant community which is mainly sideoats and hairy grama, plains lovegrass, bullgrass, Texas bluestem, various oaks, Mexican pinyon, and alligator juniper.

Although this complex produces adequate forage for yearlong use, steepness of slope, rocky surfaces, and areas of rock outcrop limit access and result in poor livestock distribution. The area is best utilized in the cooler winter months. Prescribed burning and brush control helps improve grazing distribution and generally improves vegetation condition by decreasing trees and shrubs while increasing the perennial grass component. Deferment of grazing during the summer growing season is necessary to maintain vigor and production of the perennial grasses.

## Appendix C – Special Status Species

Special status species include species currently listed or considered for listing as threatened and endangered by the USFWS, and species listed as sensitive by Bureau of Land Management.

### (1) Threatened and Endangered Species

Bo

#### Baboquivari Peak Wilderness

##### Animals:

Jaguar (*Panthera onca*)  
Lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*)  
Ocelot (*Leopardus pardalis*)  
Masked bobwhite (*Colinus virginianus ridgewayi*)  
Chiricahua leopard frog (*Rana chiricahuensis*)

##### Plants:

Kearney's blue star (*Amsonia kearneyana*)

#### Coyote Mountains Wilderness

##### Animals:

Jaguar (*Panthera onca*)  
Lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*)  
Ocelot (*Leopardus pardalis*)

##### Plants:

Pima pineapple cactus (*Corphantha scheeri var. robustispina*)

### (2) BLM Arizona Sensitive Species

Baboquivari Peak Wilderness and Coyote Mountains Wilderness

##### Animals:

Sonoran population of desert tortoise (*Gopherus agassizii*)[Candidate]  
Giant spotted whiptail (*Aspidoscelis burti stictogrammus*)  
Underwood's mastiff bat (*Eumops underwoodi*)  
Allen's (Mexican) big-eared bat (*Idionycteris phyllotis*)  
Small-footed myotis (*Myotis ciliolabrum*)  
Fringed myotis (*Myotis thysanodes*)  
Cave myotis (*Myotis velifer*)  
Long-legged myotis (*Myotis volans*)  
Big free-tailed bat (*Nyctinomops macrotis*)  
Pocketed free-tailed bat (*Nyctinomops femorosaccus*)  
Arizona myotis (*Myotis lucifugus occultus*)  
Cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*)  
[Delisted, petitioned for relisting]  
Sonoran pronghorn (*Antilocapra americana sonoriensis*) 10(j) area  
American peregrine falcon (*Falco peregrinus anatum*)  
[Delisted]

### Partial Wildlife Species List

Badger (*Taxidea taxa*)  
Bighorn sheep habitat (*Ovis canadensis*)  
Black-tailed jackrabbit (*Lepus californicus*)  
Black vultures (*Coragyps atratus*)  
Bobcat (*Felis rufus*)  
Caracara (*Caracara cheriway*)  
Coati (*Nasua nasua*)  
Coyote (*Canis latrans*)  
Desert cottontail (*Sylvilagus audubonii*)  
Desert tortoise (*Gopherus agassizii*)  
Gambel's quail (*Callipepla gambelii*)  
Gila monster (*Heloderma suspectum*)  
Golden eagle (*Aquila chrysaetos*)  
Grey fox (*Urocyon cinereoargenteus*)  
Harris' hawk (*Parabuteo unicinctus*)  
Javelina (*Dicotyles tajacu*)  
Kit fox (*Vulpes macrotis*)  
Mexican free-tailed bat (*Tadarida brasiliensis*)  
Mohave rattlesnake (*Crotalus scutulatus*)  
Mountain lion (*Felis concolor*)  
Mourning dove (*Zenaidura macroura*)  
Mule deer (*Odocoileus hemionus*)  
Peregrine falcon (*Falco peregrinus*)  
Prairie falcon (*Falco mexicanus*)  
Raccoon (*Procyon lotor*)  
Raven (*Corvus corax*)  
Red-tailed hawk (*Buteo jamaicensis*)  
Ringtail (*Bassariscus astutus*)  
Scaled quail (*Callipepla squamata*)  
Turkey vulture (*Cathartes aura*)  
Western diamondback (*Crotalus atrox*)  
White-tailed deer (*Odocoileus virginianus*)

### Partial Plant Species List

Bartram stonecrop (*Graptopetalum bartramii*)  
Big galleta (*Hilaria rigida*)  
Blue and little-leaf paloverde (*Cercidium floridum* and *C. microphyllum*)  
Brittlebush (*Encelia farinosa*)  
Bush muhly (*Muhlenbergia porteri*)  
Catclaw acacia (*Acacia greggii*)  
Creosote (*Larrea tridentata*)  
Desert broom (*Baccharis sarathroides*)  
Desert mallow (*Sphaeralcea* spp.)  
Desert willow (*Chilopsis linearis*)  
Mesquite (*Prosopis* spp.)  
Mormon tea (*Ephedra* spp.)  
Range ratany (*Krameria* spp.)  
Threeawn (*Aristida* sp.)  
Tobosagrass (*H. mutica*)  
Triangle-leaf bursage (*Ambrosia deltoidea*)  
White bursage (*Ambrosia dumosa*)  
Wolfberry (*Lycium* spp.)

# Appendix D – U.S. Fish and Wildlife Service Biological Assessment Concurrence Letter for Draft Baboquivari Peak Wilderness and Coyote Mountains Wilderness Wilderness Management Plan

COPY



## United States Department of the Interior



Fish and Wildlife Service  
Arizona Ecological Services Office  
2321 West Royal Palm Road, Suite 103  
Phoenix, Arizona 85021-4951  
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AESO/SE  
02EAAZ00-2012-I-0405

September 24, 2012

Memorandum:

To: Field Manager, Bureau of Land Management, Tucson Office, Tucson, Arizona  
From: Field Supervisor  
Subject: Draft Wilderness Management Plan, Environmental Assessment, and Biological Assessment for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness

Thank you for your agency's correspondence of August 24, 2012, regarding the Draft Wilderness Management Plan, Environmental Assessment, and Biological Assessment for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. This letter documents our review of the draft wilderness plan in compliance with section 7 of the Endangered Species Act of 1973 as amended (16 U.S.C. 1531 *et seq*) (ESA). Your letter concluded that the draft Wilderness Management Plan may affect, but is not likely to adversely affect the jaguar (*Panthera onca*) or proposed critical habitat, ocelot (*Leopardus pardalis*), lesser long-nosed bat (*Leptonycteris yerbabuenae*), masked bobwhite quail (*Colinus virginianus ridgewaysi*), Chiricahua leopard frog (*Lithobates [=Rana] chiricahuensis*), Kearney blue star (*Amsonia kearneyana*), and Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*). We concur with your determinations with rationales provided below.

The proposed action consists of the management of the 2,065 acre Baboquivari Peak Wilderness and 5,080 acre Coyote Mountains Wilderness, both located in southern Arizona approximately 45 miles southwest of Tucson. The Tohono O'odham Nation borders the wilderness areas to the west with a mixture of private, State, and Federal land (i.e., Buenos Aires National Wildlife Refuge) adjacent to the east. Several vegetation communities exist in the two wilderness areas including upper Sonoran Desert, Madrean oak woodlands, and palo verde-saguaro communities, dominated by mesquite (*Prosopis* sp.), ironwood (*Olneya tesota*), acacia (*Acacia willardiana*), several species of cacti, manzanita (*Actostaphylos* sp.), mountain mahogany (*Cercocarpus* sp.), buckthorn (*Rhamnus* sp.), shrub-live oak (*Quercus trubinella*) and silk-tassel (*Garrya wrightii*).

Higher elevations are dominated by Arizona white oak (*Q. arizonica*) and Mexican pinyon (*Pinus cembroides*), with a mix of oak, pinyon, and Arizona walnut (*Juglans major*). Elevation within the project area ranges from 7,734 feet at the summit of Baboquivari Peak to 3,000 feet at the northeast corner of the Coyote Mountains Wilderness.

On November 28, 1990, Congress designated the Baboquivari Peak Wilderness and Coyote Mountains Wilderness areas with the passage of the Arizona Desert Wilderness Act of 1990. Pursuant to the draft Wilderness Management Plan for these two wilderness areas, the Bureau of Land Management (BLM) is proposing minimal activities that are consistent with the Wilderness Act of 1964. Specific actions within the draft plan relevant to this consultation include the following: (1) posting wilderness boundary signs adjacent to the wilderness boundaries, (2) removing, repairing, or maintaining pasture fences according to BLM's grazing regulations at 43 CFR 4310; (3) fire management; (4) inventory and assessing abandoned mine sites; (5) managing potential increase in wilderness visitation and; (6) issuing Special Recreation Permits.

Portions of four grazing allotments (i.e., Thomas Canyon, Baboquivari, Elkhorn Ranch, and Anvil Ranch allotments) occur within the Baboquivari Peak Wilderness area. The Baboquivari Allotment is considered an expired lease. Acres of grazing allotments within the wilderness area include 292 acres for Thomas Canyon, 863 acres for the Elkhorn Ranch allotment, and 373 acres for the Anvil Ranch allotment. Livestock permitted on these three active allotments equates to 15 head of cattle and 11 horses total. A portion (i.e., 4,762 acres) of the Hay Hook allotment occurs within the Coyote Mountains Wilderness area, but is considered a non-use category by the BLM's management plan and the associated Environmental Assessment. Listed species within the above allotments were previously analyzed by the Service during ESA consultation on the BLM's grazing program (see U.S. Fish and Wildlife Service 2012a).

The BLM will manage wildland fires for naturalness and public safety within both wilderness areas. The BLM specifically recommends full suppression for lower Sonoran desert areas in Coyote Mountains Wilderness to protect Sonoran desert plant ecology and recommends managing a naturally ignited wildland fire for resource benefit in the higher elevations containing Oak Savanna/Chaparral vegetation communities. Vegetation species diversity and desired vegetation conditions will be analyzed by fire staff and interdisciplinary team in order to prepare appropriate fire management strategies for these two wilderness areas. Within Baboquivari Peak Wilderness only, naturally ignited fires may be allowed to burn to the maximum extent consistent with specific prescriptive parameters, and the safety of persons, property, and other resources. Changes to vegetation health as documented in annual health of the land reports will be considered in setting fire management goals.

With regard to abandoned mines, the BLM will inventory and evaluate these sites for hazards. Hazardous conditions will be remediated using the minimum tool required to accomplish the work. Any required remediation of abandoned mine workings will be designed to account for wildlife habitat and cultural values, as well as the visual impacts of the completed work.

The BLM will prohibit recreation group sizes of more than 10 people and no more than 6 pack stock animals per group per visit in the wilderness areas. Further, the BLM will monitor compliance of recommended group size through a volunteer wilderness stewardship program

that reports to the BLM Field Manager and wilderness staff. Activities under a Special Recreation Permit will be limited to day use of single-night spike camps of no more than 10 people and/or 6 pack stock animals.

Seven ESA-listed species that occur or may occur within the wilderness areas were analyzed by the BLM. These species include the jaguar and proposed critical habitat, ocelot, lesser long-nosed bat, masked bobwhite quail, Chiricahua leopard frog, Kearney blue star, and Pima pineapple cactus. Concurrences with the BLM's assessment that the Wilderness Management Plan is not likely to adversely affect these species are as follows:

### Jaguar

We concur with your determination that the proposed action is not likely to adversely affect the jaguar for the following reasons:

- The action area is within the range of the jaguar and contains habitat, as well as proposed critical habitat for the jaguar. Jaguars are rare in Arizona, but have been detected in the past within both wilderness areas. Human presence may temporarily disturb these cats. Because of the extremely rare nature of the jaguar in these wilderness areas, these effects would be considered rare occurrences and would typically be short in duration and, thus, are expected to only have insignificant short- or long-term effects to the jaguar.
- Both wilderness areas are within the Baboquivari-Coyote Subunit of proposed jaguar critical habitat (U.S. Fish and Wildlife Service 2012b). Activities within the wilderness areas will not impact the defined jaguar critical habitat primary constituent elements as proposed. The primary constituent elements specific to the jaguar include expansive open spaces in the southwestern United States of at least 84 to 100 square km (32 to 37 square miles) in size which: (1) provide connectivity to Mexico; (2) contain adequate levels of native prey species, including deer and javelina, as well as medium-sized prey such as coatis, skunks, raccoons, or jackrabbits; (3) include surface water sources available within 20 km (12.4 mi) of each other; (4) contain 3 to 40 percent canopy cover within Madrean evergreen woodland, generally recognized by a mixture of oak, juniper, and pine trees on the landscape, or semidesert grassland vegetation communities, usually characterized by tobosagrass (*Pleuraphis mutica*) or black grama (*Bouteloua eriopoda*) along with other grasses; (5) are characterized by intermediately, moderately, or highly rugged terrain; (6) are characterized by minimal to no human population density, no major roads, or no stable nighttime lighting over any 1-square-km (0.4-square-mi) area. The proposed action will have insignificant impacts to the above primary constituent elements.
- The Wilderness Management Plan would manage for preserving wilderness character, which is described in terms of undeveloped, untrammeled, natural, having outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. This will serve to protect jaguars and their habitat, including proposed critical habitat, and reduce disturbances to the species from visitation.

- The effects of the proposed action are thus insignificant and discountable in terms of individual jaguars, the species' population as a whole, and proposed critical habitat.

#### **Ocelot**

We concur with your determination that the proposed action is not likely to adversely affect the ocelot for the following reasons:

- Ocelots are rare, secretive, and have not been detected recently in the Baboquivari or Coyote Mountains. If ocelots were detected in the wilderness area, human presence might temporarily disturb these cats. However, these effects would be considered rare occurrences and short in duration and, thus, are expected to only have insignificant short- or long-term effects to ocelot.
- This plan would manage for preserving wilderness character, which is described in terms of undeveloped, untrammeled, natural, having outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. This will serve to protect ocelots and their habitat, and reduce disturbances to the species from visitation.
- The effects of the proposed action are thus insignificant and discountable in terms of individual ocelots and the species' population as a whole.

#### **Lesser long-nosed bat**

We concur with your determination that the proposed action is not likely to adversely affect the lesser long-nosed bat for the following reasons:

- Vegetation removal will use manual methods resulting in insignificant impacts to lesser long-nosed bat forage resources. Direct impacts to foraging lesser long-nosed bats will be avoided due to the timing of any work activities.
- Disturbance to lesser long-nosed bats from vegetation removal activities will not occur because maternity or day roosts do not occur within the project area. However, lesser long-nosed bat roosts do occur within the 40 mile foraging radius of these bats. However, these proposed project activities will occur during the day such that impacts will not occur to foraging bats.
- The Wilderness Management Plan would manage for preserving wilderness character, which is described in terms of undeveloped, untrammeled, natural, having outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. This will serve to protect the habitat of lesser long-nosed bat and reduce disturbances to the species from visitation.
- The effects of the proposed action are thus insignificant and discountable in terms of individual lesser long-nosed bats and the species' population as a whole.

### **Masked Bobwhite Quail**

We concur with your determination that the proposed action is not likely to adversely affect the masked bobwhite quail for the following reasons:

- A refuge population of masked bobwhite quail and captive rearing of this species was established in 1985 at Buenos Aires National Wildlife Refuge in the southern Altar Valley in Pima County, Arizona, which is within the general region of the proposed action. In 1996, Buenos Aires' masked bobwhite quail population was estimated at 300-500. However, due to drought and declining habitat conditions, masked bobwhite quail have not been detected in the Altar Valley for several years; thus, potential effects from the proposed action are discountable.
- Masked bobwhite quail could potentially exist several miles downstream from the Baboquivari Peak Wilderness on the Buenos Aires National Wildlife Refuge and thus, no direct effects would occur to the populations. The actions to protect the wilderness values of the area will serve to protect the habitat downstream.
- The effects of the proposed action are thus insignificant and discountable in terms of individual masked bobwhite quail and the species' population as a whole.

### **Chiricahua Leopard Frog**

We concur with your determination that the proposed action is not likely to adversely affect the Chiricahua leopard frog for the following reasons:

- Current known populations of the Chiricahua leopard frog are several miles downstream from the Baboquivari Peak Wilderness, so there are no direct effects to the populations. The actions to protect the wilderness values of the area will serve to protect the habitat downstream.
- The effects of the proposed action are thus insignificant and discountable in terms of individual Chiricahua leopard frogs and the species' population as a whole.

### **Pima Pineapple Cactus**

We concur with your determination that the proposed action is not likely to adversely affect the Pima pineapple cactus for the following reasons:

- The Pima pineapple cactus exists in the Coyote Mountains Wilderness Area within Mendoza Canyon. All of the threats to the species identified in your Biological Assessment are prohibited actions within the wilderness areas managed under this plan, except for livestock grazing and the invasion of non-native grasses; the latter has already occurred with Lehmann's love grass and buffelgrass. Therefore, any increase in these threats is insignificant with regard to the proposed action.

- According to the Biological Opinion for the Gila District Grazing Program, active grazing management by the BLM will occur on lands that will not impact the Pima pineapple cactus. In addition, the numbers of livestock permitted within portions of the allotments that occur within the wilderness boundaries are extremely small (e.g., 18 total cattle and horses) and effects to the Pima pineapple cactus are expected to be insignificant.
- The wilderness management plan would manage for preserving wilderness character in these mountain ranges, which is described in terms of undeveloped, untrammelled, natural, having outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. This will serve to protect the habitat of Pima pineapple cactus, and reduce disturbances to the species from visitation.
- The effects of the proposed action are thus insignificant and discountable in terms of individual Pima pineapple cactus and the species' population as a whole.

#### **Kearney Blue Star**

We concur with your determination that the proposed action is not likely to adversely affect the Kearney blue star for the following reasons:

- The Kearney blue star exists in the Baboquivari Peak Wilderness area within Brown and Thomas Canyons. Like many species in this family (*Apocynaceae*), it has milky, toxic sap and appears not to be grazed even in drought times and when surrounding vegetation is grazed (U.S. Fish and Wildlife Service 2001). Therefore, the effects from grazing to the Kearney blue star are expected to be insignificant.
- The Wilderness Management Plan would manage for preserving wilderness character in these mountain ranges, which is described in terms of undeveloped, untrammelled, natural, having outstanding opportunities for solitude or a primitive and unconfined type of recreation, and other unique or supplemental qualities. This will serve to protect the habitat of the Kearney blue star, and reduce disturbances to the species from visitation.
- The effects of the proposed action are thus insignificant and discountable in terms of individual Kearney blue star and the species' population as a whole.

With regard to the final Wilderness Management Plan, we recommend that Toupal (2003) be cited on page 13 under Native American Religious Concerns. Toupal (2003) provides a comprehensive analysis of the importance of the Baboquivari Mountains and Peak to the Tohono O'odham, as well as to other user groups, such as recreationists.

Thank you for your continued coordination concerning listed species. No further section 7 consultation is required for your Wilderness Management Plan at this time. Should project plans change, or if information on the distribution or abundance of listed species or critical habitat becomes available, this determination may need to be reconsidered. In all future correspondence on this project, please refer to the consultation number 02EAAZ00-2012-I-0405.

If you have any questions, please contact Jean Calhoun at (520) 670-6150, (x223), or Scott Richardson at (520) 670-6150, (x242).

  
Steven L. Spangle

cc (hard copy):  
Field Supervisor, Fish and Wildlife Service, Phoenix, AZ ( 2 )  
Jean Calhoun, Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ

cc (electronic copy):  
Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ

filename: BLM Draft Wilderness Management Plan.concur.SRandSR.9.24.12.docx

#### Literature Cited

- U.S. Fish and Wildlife Service. 2012a. Biological opinion on the Gila District Livestock Grazing Program. U.S. Fish and Wildlife Service, Phoenix, Arizona.
- U.S. Fish and Wildlife Service. 2012b. Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Jaguar: proposed rule. Federal Register 77(161):50214-50242.
- U.S. Fish and Wildlife Service, 2001. General Species Information: Kearney blue star (*Amsonia kearneyana*). Arizona Ecological Services Office, Southwest Region 2, at <http://www.fws.gov/southwest/cs/arizona/Documents/Redbook/Kearney%27s%20blue%20star.pdf>
- Toupal, R. S. 2003. Cultural landscapes as a methodology for understanding natural resource management impacts in the western United States. *Conservation Ecology* 7:12 (online).

## Appendix E – Access

### Recommendations:

The 1988 Phoenix Resource Management Plan identified the need to provide administrative and public access to areas that became Baboquivari Peak Wilderness and Coyote Mountains Wilderness. Since that time, no legal public access was acquired.

The purpose of this section is to provide guidance to BLM staff when access acquisition opportunities arise for the two wilderness areas. This process should involve a BLM realty specialist or qualified realty contractor in developing any agreements, rights-of-ways or other suitable means of obtaining legal access or right-of-ways and to place signs, small parking areas (no larger than would safely accommodate no more than five vehicles per parking area) or trailheads.

No trailheads or parking can be located inside wilderness.

Pursue Land and Water Conservation Act (LWCA) opportunities, but keep in mind that LWCA is a funding authority only, not an acquisition authority. All acquisitions must be completed with an existing authorized and approved land use plan. This wilderness plan tiers from the 1988 Phoenix RMP, which included decisions such as “obtain legal access” for both areas.

Decisions pertaining to the Baboquivari Peak Wilderness and Coyote Mountains Wilderness areas made prior to the Wilderness act of 1990 are found in the 1988 Phoenix RMP. Some of the decisions may be outdated and may not apply pending an analysis and interpretation of the language found in the 1988 Phoenix RMP/EIS and how it relates to the 1990 Wilderness Act.

There are several options that the BLM can approach to obtaining rights-of-way from all the property owners that access would need to cross. Some of these options are: obtaining a mutually agreed upon right-of-way, purchasing the access routes crossing properties; and the final and not advisable is by condemnation.

A team would look at all viable access routes possibilities, then approach and write to the land owners and ask if they would accommodate the BLM with granting the BLM a right-of-way across their lands. Access will come with negotiations, conditions, restrictions and costs. Access acquisition is not a quick

process and will take a lot of work and time. Once the BLM collects and reviews all of the data for all of the considered route options, the BLM should be able to decide which one to select and meet the terms.

If any small parking areas are deemed necessary, they must be outside the wilderness boundary and the design should safely accommodate no more than five vehicles per parking area. Any small information kiosks shall be located outside of the wilderness boundaries.

Legal public access may be accomplished by pursuing opportunities when they arise and adhering to the following conditions:

- Acquire access to public lands for each wilderness where social and biological impacts are minimal.
- Apply the primary methods available to resolve access needs, consistent with law, regulations and policy for the preferred routes.

### **Baboquivari Peak Wilderness**

Continue to inform visitors of the Thomas Canyon Access which contains The Nature Conservancy private pedestrian easement.

Work cooperatively with adjacent land owners to maintain and revise information signs and a small register box.

If possible, and feasible, obtain legal public access on the TNC pedestrian easement through the Humphrey Ranch.

**Alternative:** If obtaining legal public access on the Humphrey TNC easement is not possible, pursue state land access to Baboquivari Peak Wilderness. Road and/or trail construction to the wilderness boundary may be needed. If possible, work with the Arizona Game and Fish to pursue legal public access.

### **Coyote Mountains Wilderness:**

Continue to inform visitors about the Arizona Game and Fish seasonal access point at the Anvil Ranch.

**Alternative:** Pursue the same right-of-way or similar access arrangement to the Coyote Mountains Wilderness area boundary that the Hay Hook Ranch owners, Pima County, currently retain. Work cooperatively with the Hay Hook Ranch owners in locating appropriate access, signage and access information.

## **Appendix F – Excerpt from 2010 Gila District Fire Management Plan: Altar Valley – Ironwood – Dripping Springs Unit**

### **Baboquivari Peak & Coyote Mountain Wilderness areas (7,145 acres)**

#### **Location**

The Baboquivari Peak Wilderness and Coyote Mountains Wilderness areas are bordered on the west by Tohono O’odham Indian tribal lands. The primary ground access to the Baboquivari Peak Wilderness is by traveling west from Tucson, Arizona on State Route 86 to its junction with State Highway 286 at Three Points, Arizona. Follow State Route 286 south for about 30 miles towards Sasabe, Arizona, to the entrance road to Thomas Canyon. The Nature Conservancy maintains a pedestrian access route to the wilderness area from the Humphrey Ranch located in Thomas Canyon.

The primary ground access to the Coyote Mountain Wilderness area is by traveling west from Tucson, Arizona, on State Route 86 to its junction with State Highway 286 at Three Points, Arizona. Follow State Route 286 south for approximately eight miles towards Sasabe, Arizona. The Coyote Mountains are located four miles east of Kitt Peak. An unimproved dirt road that follows the South Mendoza Wash leads up to the wilderness boundary. Driving time to this area from the Sierra Vista Project Office is approximately two to three hours. Permission to access the wilderness boundary must be obtained from the private landowner, whose property provides access to this area or the Tohono O’odham Indian Nation if access is desired from the Kitt Peak side of the area.

#### **Characteristics**

The topography in these two wilderness areas is relatively steep and difficult to access by ground. The plant communities on the lower elevations (3,500-5,500 feet) are dominated by warm-season perennial grasses. The major species are sideoats, black, blue, hairy, sprucetop, and Rothrock gramas; plains lovegrass; cane beardgrass; Arizona cottontop; plains bristlegrass; big and alkali sacaton; tobosa, vine and curly mesquite; bush muhly; and mesa, blue, red, poverty, and spidergrass threeawns.

Average annual production of these grasslands is about 1,000 pounds per acre.

Important shrubs include false mesquite, range ratany, shrubby buckwheat, fourwing saltbush, soap tree yucca, and sacahuista. Mesquite is the dominant tree of the area with other common trees including catclaw acacia, netleaf hackberry, western soapberry, desert willow, Arizona ash, Arizona black walnut, cottonwood, and black willow.

Summer annual grasses are important in the area and include species of grama, panic, sprangletop, and threeawn. Perennial forbs are also important and include species like evolvulus, sida, dyschoriste, wild bean, lotus, matweed, zinnia, hog potato, perezia, cudweeds, and vetch.

The vegetation on the higher elevations (5,500-8,500 feet) is oak-savannah with open canopies (5-10%) of Emory, Mexican blue, Arizona white oak, and one-seed juniper, and perennial grasses in the understory. The major grasses include sideoats, blue, hairy, and purple gramas; bullgrass; deergrass; Texas bluestem; plains lovegrass; woolly bunchgrass; crinkleawn; prairie junegrass; squirreltail; pinyon ricegrass; and beggartick threeawn. The dominant shrubs include sacahuista, California brickelbush, wait-a-bit mimosa, and yerba de pasmo. Average annual production of these grasslands is about 1,500 pounds per acre.

#### **Fire History**

Records show low fire frequencies over the past twenty years. In 2002, the Center Fire burned approximately 180 acres, and in 2003 the Baboquivari Fire burned immediately adjacent to the Baboquivari Peak Wilderness on Tohono O’odham Nation land. In July 2007, the Alhambra Fire burned the 2,224 acres of the BLM non-wilderness portion adjacent to both wilderness areas. In 2008, the Solano Fire burned 2,177 acres, mostly outside of Baboquivari Peak and Coyote Mountains wilderness areas. In 2009, the Elkhorn Fire burned 1,921 acres, most of which occurred in the Baboquivari Peak Wilderness. In 2012, the Montezuma Fire burned approximately 40 acres within the Baboquivari Peak Wilderness.

#### **Fire Regime/Condition Class**

The fire regime for the majority of this area is rated as fire regime IV (35- to 100-year frequency, stand replacement severity). The Condition Class rating for this area is predominantly assessed at level I with some isolated areas being rated at level II.

## Values at Risk

1) Provide for the long-term protection and preservation of the area's wilderness character under a principle of non-degradation. The area's natural condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historical value present will be managed so that they will remain unimpaired.

2) Manage the wilderness area for the use and enjoyment of visitors in a manner that will leave the area unimpaired for future use and enjoyment as wilderness. The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use.

3) Manage the area using minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Management will seek to preserve spontaneity of use and as much freedom from regulation as possible.

4) Manage non-conforming but accepted uses permitted by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area's wilderness character. Non-conforming uses are the exception rather than the rule; therefore, emphasis is placed on maintaining wilderness character.

When addressing T&E species and/or T&E species habitat, the Conservation Measures outlined in Appendix B will be implemented during fire suppression operations unless firefighter or public safety, or the protection of property, improvements, or natural resources, render them infeasible during a particular operation. Each Conservation Measure has been given an alphanumeric designation for organizational purposes (*e.g.*, FS-1). Necessary modifications of the Conservation Measures or impacts to federally protected species and habitat during fire suppression operations will be documented by the Resource Advisor, and coordinated with the USFWS.

## Communities at Risk

There are no identified communities at risk within this management area.

## Fire Management Objectives Suppression Objectives

Firefighter and public safety is the first priority in every fire management activity. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources must be based on values to be protected, human health and safety, and costs of protection (2001 Federal Wildland Fire Management Policy).

### Fire Use and Prescribed Fire Objectives

Prescribed fire treatments will be used to reduce invasive or woody species cover, increase herbaceous cover, improve water infiltration, and reduce soil erosion.

### Non-Fire Fuels Treatment Objectives

Non-fire treatments will be used to reduce hazardous fuel loads; invasive or woody species cover, increase herbaceous cover, improve ingress/egress routes, improve water infiltration, and reduce soil erosion.

## Fire Management Strategies Suppression

The current wildland fire management strategy for wilderness areas is to apply an AMR, depending on weather and fuel conditions. Fire danger ratings (low, medium, high, etc.) are generally based on the Burning Index (BI) category of the National Fire Danger Rating System (NFDRS). This rating system is the national standard and is based on input from Remote Automated Weather Stations (RAWS). Actual on-the-ground conditions may vary slightly due to local winds, temperature variations, and spotty annual precipitation events. Planned suppression actions are based on the prevailing fire danger, fuel conditions, fire history in the area, and impacts on wilderness resources. The actions are divided into two separate fire-hazard categories:

- **Category One Fire Hazard**

This category covers a period of time when the relative fire danger is equal to low, moderate, or high. The classification is based on evaluation of fuel moisture, relative humidity, and wind speed. During the "low" and "moderate" fire danger periods, fires will be difficult to ignite and easy to control. During the "high" fire danger period of Category One, fires will be less difficult to ignite and harder to control.

- **Category One Fire Hazard Response**

Establish ground and/or aerial surveillance as soon as possible to determine fire location, situation, spread potential, and opportunities for using natural barriers. Evaluate fire conditions, fuel topography, and wilderness resource considerations and work with the Resource Advisor to determine the appropriate management response. The Resource Advisor may be on the fire line or in the fire management office as deemed necessary by the Field Manager. Fire crew personnel will use hand tools only. The use of air tankers, helicopters, and portable pumps or chainsaws requires the approval of the Field Office Manager. Emergency vehicle use in the wilderness area must also be approved by the Field Office Manager.

- **Category Two Fire Hazard**

This category covers a period of time when the fire danger rating is classified as very high to extreme based on an evaluation of fuel moisture, temperature, relative humidity, weather conditions, and predicted fire behavior. Heavy fuels are very dry and annual growth has cured. Fire behavior will be intense and may be erratic. Rapid rates of spread, crowning, torching, and spotting will occur. Fires may become serious and difficult to control unless initial attack contains the fire at small acreages.

- **Category Two Fire – Hazard Response**

Establish ground and/or air surveillance as soon as possible to determine fire location, assess situation, and initially direct suppression operations. Send fire crew and Resource Advisor immediately to evaluate wilderness resource considerations, fire situation, fuel conditions, and topography. Initiate swift, appropriate suppression actions to control the fire, giving priority to techniques which least disturb the natural, cultural, and human-made features. Power saws and portable pumps may be used with Field Office Manager approval. Use of emergency vehicles, air tankers, and helicopters must also be approved by the Field Office Manager.

Where T&E species have the potential to be impacted by suppression activities, implementing the

Conservation Measures (see Appendix B of the Biological and Conference Opinion for the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, September 2004) during fire suppression to the extent possible would minimize or eliminate the effects to federally protected species and habitats.

### **Wildland Fire Use**

Gila District fire staff will work with Resource Management Specialists to identify opportunities for wildland fire use to achieve resource management objectives. Where T&E species have the potential to be impacted by wildland fire use activities, implementing the Conservation Measures (see Appendix B of the Biological and Conference Opinion for the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, September 2004) during fire suppression to the extent possible would minimize or eliminate the effects to federally protected species and habitats.

### **Prescribed Fire**

Gila District fire staff will work with Resource Management Specialists to identify opportunities and implement effective prescribed fire treatments to achieve resource management objectives.

Where T&E species have the potential to be impacted by prescribed fire activities, implementing the Conservation Measures (see Appendix B of the Biological and Conference Opinion for the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, September 2004) during prescribed fire treatments to the extent possible would minimize or eliminate the effects to federally protected species and habitats.

### **Non-Fire Fuels Treatments**

Gila District fire staff will work with Resource Management Specialists to identify opportunities and implement effective non-fire treatments to achieve resource management objectives.

Where T&E species have the potential to be impacted by non-fire fuels treatments, implementing the Conservation Measures (see Appendix B of the Biological and Conference Opinion for the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, September 2004) during non-fire fuels treatments to the extent possible

would minimize or eliminate the effects to federally protected species and habitats.

## **Appendix G – Operating Guidance for Wildland Fire Suppression**

For all fire management activities in Wilderness areas, Wilderness Study Areas, and areas being managed for Wilderness characteristics according to Land Use Plans (LUP), when suppression actions are required, minimum impact suppression tactics (MIST) would be applied and coordinated with Wilderness area management objectives and guidelines (Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, 2004).

The application of the appropriate management response (AMR) strategy represents a range of available management responses to wildland fires. Responses can range from full fire suppression to managing fires for resource benefits (fire use). Management responses applied to a fire are identified in the Gila District Fire Management Plan and are based on objectives derived from the land use allocations; relative risk to resources, the public and firefighters; potential complexity; and the ability to defend management boundaries (Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, 2004). The development of an AMR includes the following evaluation criteria (Interagency Standards for Fire and Fire Aviation Operations, 2006):

- Risks to firefighters and public health and safety
- Land and Resource Management Objectives
- Weather
- Fuel conditions
- Threats and values to be protected
- Costs efficiencies

The development of an AMR in the event of a wildland fire event will be done cooperatively with the Field Manager, District FMO, and appropriate resource specialists.

For fire suppression activities, a protocol for consultation has been developed as a part of the Biological Opinion (Biological and Conference Opinion for the BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, 2004). This programmatic consultation contains conservation measures and prescriptions for use in fire suppression activities. Emergency

consultation should only be needed in the future if suppression actions fall outside of these prescriptions/measures. The BO outlines coordination needs for emergency response actions that may affect a listed/proposed species and/or critical habitat. The following protocol will apply:

The BLM will contact the appropriate USFWS biologist as soon as practical once a wildfire starts and a determination is made that a federally protected species and/or its habitat could be affected by the fire and/or fire-suppression activities. The USFWS will work with the BLM during the emergency response to apply the appropriate Conservation Measures. If Conservation Measures cannot be applied during the suppression activities, the BLM will need to consult after the fact on any suppression actions that may have affected the federally protected species or its habitat. If Conservation Measures are adhered to, the BLM will report on the actions taken and effects to the species and its habitat following the fire, but no further consultation on that incident will be required.

### **Minimum Impact Suppression Tactics (MIST)** [Minimum Impact Suppression Tactics \(MIST\)](#)

Use the minimum tool concept and use the most up to date versions of the MRDG Minimum Requirements Decision Guide  
Minimum Requirements Decision Guide

## Appendix H – Sky Islands

### What are Sky Islands?

#### [What are Sky Islands?](#)

The “sky islands” of Arizona and New Mexico in the southwestern United States form a unique complex of about 27 mountain ranges whose boundaries, at their lowest elevation, are desert scrub, grasslands, or oak woodlands (Figs. 1 and 2; Table 1). Since the last glaciation, these forested mountain ranges have become relatively isolated from each other.

Expanding desert grasslands and desert scrub in the valleys (“the sea” between the Sky Islands) have limited genetic interchange between populations and created environments with high evolutionary potential. The resulting sky island ecosystems support many perennial streams in an arid climate, have a high number of endemic species, and harbor most game species as well as most threatened and endangered species in the Southwest.

The ecosystems of each mountain range are of major interest to resource managers concerned with preserving each sky island’s unique biogeography and biological diversity as well as to the public for recreation. Land uses sometimes conflict on the sky islands: camping, rock climbing, car-based tourism, military maneuvers, hunting, fishing, exotic grass and fish stocking, grazing, water-supply withdrawals, timber and fuelwood extraction, bird watching, critical habitat for threatened and endangered species, skiing, summer homes, mining, scientific research, sacred Native American ceremonies, and archaeological sites.

*Interior West-Our Living Resources, National Biological Service, Natural Resource Laboratory. Colorado State University, Fort Collins, CO 80523*  
*Southwestern Sky Island Ecosystems, by Peter Warshall, University of Arizona.*

# Appendix I – Minimum Requirements Decision Guide

## Process Outline

**Step 1: Determine if any administrative action is necessary.** First, describe the situation that may prompt action and describe why it is a problem or issue. Then, answer the following questions to determine if administrative action is necessary in wilderness:

**A. Options Outside of Wilderness** – Is action necessary within wilderness?

**B. Valid Existing Rights or Special Provision of Wilderness Legislation** – Is action necessary to satisfy valid existing rights or a special provision in wilderness legislation (the Wilderness Act of 1964 or subsequent wilderness laws) that allows consideration of the Section 4(c) prohibited uses?

**C. Requirements of Other Legislation** – (ESA, ARPA, NHPA, Dam Safety Act, Clean Air Act, etc.) - Is action necessary to meet the requirements of other laws?

**D. Other Guidance** – Is action necessary to conform to direction contained in agency policy, unit and wilderness management plans, species recovery plans, or agreements with tribal, state and local governments or other federal agencies?

**E. Wilderness Character** – Is action necessary to preserve one or more of the qualities of wilderness character including: untrammeled, undeveloped, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, or unique components that reflect the character of this wilderness area?

**F. Public Purposes of Wilderness** – Is action necessary to support one or more of the public purposes for wilderness (as stated in Section 4(b) of the Wilderness Act) of recreation, scenic, scientific, education, conservation, and historical use?

**Step 1: Conclusion – Is Administrative Action Necessary?** If action is necessary, proceed to Step 2 to determine the minimum activity which least impacts the wilderness resource and character.

## **Step 2: Determine the minimum activity.**

**A. Description of Alternative Action** – For each alternative, describe what methods and techniques will

be used, when the action will take place, where the action will take place and what mitigation measures are necessary.

Alternatives considered should include one with the use of the suggested prohibited equipment or facilities, one with none of the Section 4 (c) prohibitions, and, if possible one with a mix of prohibited and non-prohibited uses. Alternatives should be “feasible” and creative.

**B. Alternative Comparison** – For each alternative, describe effects based on:

- Wilderness Character
  - Untrammeled
  - Undeveloped
  - Naturalness
  - Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation
- Heritage and Cultural Resources
- Maintaining Traditional Skills
- Special Provisions
- Safety of Personnel, Visitors, and Contractors
- Economics and Time Constraints
- Additional Wilderness-specific Criteria.
  - Include mitigation (timing, location, frequency, design standards, etc.)

## **Step 2: Decision – What is the Minimum Activity?**

- Identify the selected alternative.
- Describe the rationale for selecting this alternative, based on law and policy criteria.
- Describe any monitoring and reporting requirements.

## **Approvals and NEPA Analysis & Reporting**

- Follow agency guidelines.

Refer to the MRDG **Overview**, **Instructions**, and **Worksheets** for more information.  
[Minimum Requirements Decision Guide](#)

## **Appendix J – Arizona Standards for Rangeland Health**

Land health standards are the goals for the desired condition of the biological and physical components and characteristics of rangelands, and apply to all resources and resource uses. Standards are measurable and attainable and comply with various federal and state statutes, policies, and directives applicable to BLM rangelands. The Arizona Standards for Rangeland Health and Guidelines for Grazing Administration (USDI, BLM 1997) establish three land health standards as indicators for rangeland health on public lands, as described below.

### **Land Health Standard 1: Upland Sites**

Upland soils exhibit infiltration, permeability, and erosion rates that are appropriate to soil type, climate and landform (ecological site). Soil conditions support proper functioning of hydrologic, energy, and nutrient cycles. Many factors interact to maintain stable soils and healthy soil conditions, including appropriate amounts of vegetative cover, litter, and soil porosity and organic matter. Under proper functioning conditions, rates of soil loss and infiltration are consistent with the potential of the site. Ground cover in the form of plants, litter or rock is present in pattern, kind, and amount sufficient to prevent accelerated erosion for the ecological site; or ground cover is increasing as determined by monitoring over an established period of time. Signs of accelerated erosion are minimal or diminishing for the ecological site as determined by monitoring over an established period of time, as indicated by such factors as ground cover (including litter, live vegetation [amount and type, such as trees, shrubs, grasses], and rock) and signs of erosion (including flow pattern, gullies, rills, plant pedestaling).

### **Land Health Standard 2: Riparian-Wetland Sites**

Riparian-wetland areas are in properly functioning condition. Stream channel morphology and functions are appropriate for proper functioning condition for existing climate, landform, and channel reach characteristics. Riparian-wetland areas are functioning properly when adequate vegetation, landform, or large woody debris is present to dissipate stream energy associated with high water flows, as indicated by such factors as gradient, width/depth ratio, channel roughness and sinuosity of the stream channel, bank stabilization, reduced erosion, captured sediment, groundwater recharge, and dissipation of energy by vegetation. Riparian-wetland functioning condition assessments are

based on examination of hydrologic, vegetative, soil and erosion-deposition factors. The BLM has developed a standard checklist to address these factors and make functional assessments. Riparian-wetland areas are functioning properly as indicated by the results of the application of the appropriate checklist (USDI, BLM 1997).

The two exemptions to Standard 2 include (1) dirt tanks, wells, and other water facilities constructed or placed at a location for the purpose of providing water for livestock and/or wildlife and which have not been determined through local planning efforts to provide for riparian or wetland habitat; and, (2) water impoundments permitted for construction, mining, or other similar activities.

### **Land Health Standard 3: Desired Resource Conditions**

Productive and diverse upland and riparian-wetland plant communities of native species exist and are maintained. Upland and riparian-wetland plant communities meet desired plant community objectives. Plant community objectives are determined with consideration for all multiple uses. Objectives also address native species, and the requirements of the Taylor Grazing Act, FLPMA, Endangered Species Act, Clean Water Act, and appropriate laws, regulations, and policies. Desired plant community objectives will be developed to assure that soil conditions and ecosystem function described in Standards 1 and 2 are met. They detail a site-specific plant community, which when obtained, will assure rangeland health, State water quality standards, and habitat for endangered, threatened, and sensitive species. Thus, desired plant community objectives will be used as an indicator of ecosystem function and rangeland health, as indicated by composition, structure, and distribution. The exception to Standard 3 includes ecological sites or stream reaches on which a change in existing vegetation is physically, biologically, or economically impractical.

### **Arizona Guidelines for Grazing Administration**

The Arizona Guidelines for Grazing Administration are a series of management practices used to ensure that grazing activities meet the Land Health Standards. These guidelines apply to management of all public lands, and are therefore common to all alternatives presented in this document.

1-1. Management activities will maintain or promote ground cover that will provide for infiltration,

permeability, soil moisture storage, and soil stability appropriate for the ecological sites within management units. The ground cover should maintain soil organisms and plants and animals to support the hydrologic and nutrient cycles, and energy flow. Ground cover and signs of erosion are surrogate measures for hydrologic and nutrient cycles and energy flow.

1-2. When grazing practices alone are not likely to restore areas of low infiltration or permeability, land management treatments may be designed and implemented to attain improvement.

2-1. Management practices maintain or promote sufficient vegetation to maintain, improve or restore riparian-wetland functions of energy dissipation, sediment capture, groundwater recharge and stream bank stability, thus promoting stream channel morphology (e.g., gradient, width/depth ratio, channel roughness and sinuosity) and functions appropriate to climate and landform.

2-2. New facilities are located away from riparian-wetland areas if they conflict with achieving or maintaining riparian-wetland function. Existing facilities are used in a way that does not conflict with riparian-wetland functions or are relocated or modified when incompatible with riparian-wetland functions.

2-3. The development of springs and seeps or other projects affecting water and associated resources shall be designed to protect ecological functions and processes.

3-1. The use and perpetuation of native species will be emphasized. However, when restoring or rehabilitating disturbed or degraded rangelands, non-intrusive, nonnative plant species are appropriate for use where native species (a) are not available, (b) are not economically feasible, (c) cannot achieve ecological objectives as well as nonnative species, and/or (d) cannot compete with already established nonnative species.

3-2. Conservation of federal threatened or endangered, proposed, candidate, and other special status species is promoted by the maintenance or restoration of their habitats.

3-3. Management practices maintain, restore, or enhance water quality in conformance with state or federal standards.

3-4. Intensity, season and frequency of use, and distribution of grazing use should provide for growth

and reproduction of those plant species needed to reach desired plant community objectives.

3-5. Grazing on designated ephemeral (annual and perennial) rangeland may be authorized if the following conditions are met:

- ephemeral vegetation is present in draws, washes, and under shrubs and has grown to
- a useable level at the time grazing begins;
- sufficient surface and subsurface soil moisture exists for continued plant growth;
- serviceable waters are capable of providing for proper grazing distribution;
- sufficient annual vegetation will remain on site to satisfy other resource concerns, (i.e.,
- watershed, wildlife, wild horses and burros); and
- monitoring is conducted during grazing to determine if objectives are being met.

3-6. Management practices will target those populations of noxious weeds which can be controlled or eliminated by approved methods.

3-7. Management practices to achieve desired plant communities will consider protection and conservation of known cultural resources, including historical sites, and prehistoric sites and plants of significance to Native American peoples.

## Appendix K – Excerpts of Federal Register, Wilderness Management Final Rule

December 14, 2000 (Federal Register, 12/14/00, 65 FR 78357-78376). This final rule revises and updates the regulations for management of designated wilderness areas.

The final rule recognizes rock climbing as a legitimate use of BLM-managed wilderness areas. Under the rule, rock climbers do not need a permit to climb. Climbers may not, however, use power drills to install permanent fixed anchors.

The final rule allows American Indians to use BLM-managed wilderness areas for traditional religious purposes. BLM managers have authority under other regulations and federal law to temporarily close an area to protect or accommodate this or any other type of use in appropriate circumstances. The final rule:

- Makes clear that sailboats, sailboards, parachutes, game carriers, carts, wagons, and similar devices are “mechanical transport” that cannot be used in wilderness areas. The rule also defines “motorized equipment” as including chainsaws, power drills, and motor vehicles. The Wilderness Act of 1964 prohibits the use of mechanical transport and motorized equipment in wilderness areas,
- implements the Americans with Disabilities Act (ADA) of 1990 by allowing wheelchair use in wilderness areas by those individuals who need them. Consistent with the provisions of ADA, the BLM will not construct facilities or modify land conditions to accommodate wheelchair use,
- makes clear that the use of horses or other pack stock is a legitimate activity in wilderness areas,
- retains the existing prohibition against the holding of competitive events, such as foot or watercraft races, in designated wilderness,
- consolidates existing provisions that prohibit aircraft from landing in wilderness areas or from dropping skydivers or materials into these areas,

- affirms the right of miners with valid existing rights to carry on certain activities in support of their mining claims, consistent with BLM requirements to protect wilderness values,
- allows grazing to continue in wilderness areas at the level that existed at the time Congress designated these areas as wilderness, and
- ensures access to owners of non-federal lands that are completely surrounded by BLM-managed wilderness areas (known as inholdings). The BLM will approve an access route if it existed at the time Congress designated the surrounding area as wilderness; if such a route did not exist at that time, the Bureau will approve non-motorized access to the inholding.

The final wilderness management rule is published in the Code of Federal Regulations at 43 CFR 6300. [Wilderness Management Final Rule](#)

# Appendix L – Cultural Resource Management Policy

## I. Cultural Resource Management Policy

A. Wilderness designation, in and of itself, does not affect the BLM’s cultural resource management responsibilities. However, the manner in which cultural resources are managed differs within wilderness areas, in that cultural resource management actions must not adversely affect the overall wilderness character of a designated wilderness area. Within designated wilderness areas, as elsewhere on public lands, Field Managers will maintain an affirmative cultural resource management program that includes the following:

1. Inventory cultural resources at a level sufficient to determine the kinds of resources known and projected to occur, and evaluate their public, scientific and conservation values;
2. Establish priorities and Allocate cultural resources to specific use categories for their protection;
3. Prepare and implement Cultural Resource Project Plans that specify measures needed to protect priority cultural resources from human-caused or natural deterioration, recognizing that some cultural resources may be subject to the forces of nature in the same manner as other wilderness resources;
4. Provide for scientific and public uses by issuing permits for appropriate controlled scientific investigation and by developing suitable means for public interpretation in a manner which conforms to the wilderness environment;
5. Accommodate appropriate traditional uses by Native Americans.

B. Cultural resource management excavation, stabilization, and similar protection and use activities may be approved by the Field Manager on a case-by-case basis. Such activities will be approved only if the wilderness character of the area as a whole would not be degraded and the work is necessary to safeguard or realize the allocated use(s) of the cultural resources. Activities involving the collection or removal of archaeological resources must be carried out consistent with the provisions of Section IV, below.

C. Approved field activities must be carried out in an unobtrusive manner and must employ methods compatible with the preservation of wilderness character, using the “minimum tool” needed for accomplishing desired, acceptable objectives. Field activities will normally be carried out using non-motorized and non-mechanical vehicles and using non-motorized equipment.

D. Field Managers will examine all actions proposed in designated wilderness areas, including proposed wilderness program actions, to determine whether cultural resources might be affected, and whether it would therefore be necessary to comply with Section 106 of the National Historic Preservation Act. Cultural resource inventory, evaluation and treatment may be needed to identify and mitigate potential adverse effects. Associated costs are the responsibility of the program proposing the action.

## II. Inventory and Evaluation

### A. Cultural Resource Management Program.

Section 110 of the National Historic Preservation Act directs each Federal agency to establish a program to locate, inventory and nominate to the National Register of Historic Places all federally owned properties that appear to qualify. Section 201 of the Federal Land Policy and Management Act (FLPMA) directs the preparation and maintenance of an inventory of all public lands and their resources and other values, kept current to reflect changes in condition. Cultural resource inventories and evaluations should continue in designated wilderness areas according to cultural resource program priorities. Inventory work must be conducted unobtrusively, normally without motorized or mechanical equipment or vehicles, using the minimum tool necessary in a manner compatible with the preservation of the wilderness character of the area. Methods that temporarily infringe on the wilderness character of the area, resulting in unavoidable, localized, short-term adverse impacts, may be approved by the Field Manager only if alternate methods are not available.

### B. Wilderness Management Program.

Cultural resource inventories and evaluations may be necessary to enable the wilderness management program to comply with Section 106 of the National Historic Preservation Act. This may include identifying and evaluating standing structures, assessing effects to cultural resources from the development of visitor use facilities or correction of unacceptable environmental

conditions, and establishing use capacity and limits of acceptable change standards. Inventory and evaluation may also be needed to locate and define more fully those special features in the wilderness area that contributed to wilderness designation.

### **C. Other Resource Management Programs.**

For compliance with Section 106 of the National Historic Preservation Act, cultural resource inventories and evaluations may be necessary in advance of surface-disturbing management activities within the wilderness area, such as livestock grazing facilities, mineral development, watershed restoration, reforestation, or similar activities.

## **III. Management Planning**

**A. Cultural Resource Project Plans (CRPPs)** are prepared according to priorities established in land use planning. The CRPPs may also need to be prepared to prescribe emergency protection measures for cultural resources. The CRPPs for cultural resources located in designated wilderness areas may be approved by the Field Manager. Such plans must address constraints on cultural resource management activities necessary to preserve the wilderness character of the area. These constraints on cultural resource activities should keep impacts on wilderness resources within the established standards developed under the Limits of Acceptable Change (LAC) management system, where this system has been used as a wilderness management strategy in the wilderness management plan. A summary of cultural resource activities and constraints, set forth in the approved CRPP, must be incorporated in new wilderness plans or updates to existing wilderness management plans.

Wilderness management plans must address the management of cultural resources that are special features contributing to the wilderness designation, the management of existing structures, and the constraints needed to avoid unnecessary effects to other cultural resources. The wilderness management plan should also address limits of acceptable change standards to provide guidance for cultural resource management decisions. This plan should include all management actions prescribed for the specific designated wilderness area.

The planning process should result in a single document, the wilderness management plan, for each area. When possible, plans for cultural resources should be developed simultaneously with the wilderness plan. Existing management prescriptions for cultural

resources within designated wilderness must be incorporated in new wilderness management plans. When a Cultural Resource Project Plan is prepared after the wilderness management plan has been approved, a summary of cultural resource decisions must be incorporated in the wilderness plan by amendment.

## **IV. Monitoring**

Monitoring the condition of cultural resources is an important aspect of wilderness management that should be addressed in Cultural Resource Project Plans. Monitoring should continue in designated wilderness areas to prevent loss from neglect and to detect damage caused by natural forces or human activities.

## **V. Permitting Scientific Research**

**A. Scientific Use.** Cultural resources in designated wilderness areas are likely to contain scientific data important for current or future research and educational interests. Specific direction for protecting defined scientific use potential should be addressed in both Cultural Resource Project Plans and wilderness management plans. Any cultural resources that contributed to wilderness designation should be a particular concern of the wilderness management plan. Any special limitations on their scientific use or other use, as may be required to protect their continuing contribution to wilderness, should be part of the Cultural Resource Project Plan.

**B. Cultural Resource Use Permits.** The use of cultural properties for scientific research may be proposed in an application for a Cultural Resource Use Permit. Activities authorized in an approved permit must be consistent with both the wilderness management plan and any applicable Cultural Resource Project Plan. When a permit involves excavation or removal of archaeological resources, provisions of the Archaeological Resources Protection Act (as detailed in regulations at 43 CFR 7 and BLM Manual Section 8150) are followed for processing the permit application. Permits for these activities are issued by the Arizona State Historic Preservation Officer.

Research may be authorized in wilderness areas if it will be carried out in an unobtrusive manner by methods compatible with preserving the wilderness character. Research should be directed to cultural properties that are threatened by imminent destruction due to human or natural causes. Permit applicants must justify adequately why proposed projects cannot be conducted outside designated wilderness areas.

**C. Archaeological Excavation.** Archaeological excavation is a normal and acceptable method of scientific research on suitable cultural resources. In designated wilderness areas, excavations must be carried out in a manner compatible with the preservation of the wilderness environment and the unique features that contributed to wilderness designation. Equipment used for archaeological excavations should be the minimal tool necessary and the least degrading to the wilderness environment. The extent of excavation should be the minimum required to meet the research objectives and protect the remaining scientific value of the cultural resources. The excavated area must be rehabilitated to render excavations substantially unnoticeable, i.e., the disturbed areas must be restored to as near the original physical condition as possible.

Archaeological excavations in designated wilderness areas may be approved by the Field Manager, subject to Cultural Resource Use Permits issued by the Arizona State Historic Preservation Officer.

#### **VI. Cultural Resources Protection, Stabilization, Reconstruction, Restoration and Enhancement**

Special physical treatment of cultural resources is not normally necessary to maintain an area's wilderness character. However, such treatment is sometimes necessary to provide adequate protection and management to maintain, unimpaired, the special scientific, educational or historical values that contribute to wilderness designation. Both CRPPs and wilderness management plans should address the specific details of cultural resource protection or stabilization needs. Wilderness management plans should address reconstruction, restoration and enhancement of cultural resources for recreation and interpretation purposes. Special treatment needed to manage cultural resources in wilderness areas must be substantially unnoticeable, use natural materials, and harmonize to the extent possible with the wilderness resource. Tools and equipment used to manage cultural resources must be the minimum necessary. Stabilization, reconstruction, restoration and enhancement activities may be approved by the Field Manager on a case-by-case basis.

#### **VIII. Avoidance and/or Mitigation of Effects: Section 106 Compliance**

Surface-disturbing activities proposed in designated wilderness areas, including cultural resource protection and use activities, are subject to the requirements of Section 106 of the National Historic Preservation Act.

Cultural resource inventory, evaluation, and avoidance or mitigation of effects may be necessary in portions of the designated wilderness area in response to these requirements. Options for avoidance or mitigation in a specific situation may be constrained by consideration of the wilderness values. Wilderness management plans should address compliance with Section 106, particularly with regard to: proposed recreation, range, or mineral developments; proposed decisions on removing, maintaining, or allowing the natural deterioration of historic and prehistoric cultural properties; proposed management of standing structures; and proposed actions to correct undesirable conditions.

#### **Cultural Resource Management Use Categories**

The BLM manages cultural resources for their information potential, their public and traditional uses, and to conserve their values for the future.

#### **Use Categories**

The BLM management system requires field offices to allocate cultural properties known and projected to occur in a planning area to appropriate use categories. Use categories establish what cultural resources and values need to be protected, and when or how use should be authorized. Cultural resources can be used in a variety of ways, including research, traditional or ceremonial purposes, interpretive exhibits, educational field schools, experimental studies, and as resources "banks" to be conserved for future use.

Allocations to use categories should be consistent with historic context documents and State Historic Preservation Plans. These categories are: 1) Scientific Use, 2) Conservation for Future Use, 3) Traditional Use, 4) Public Use, 5) Experimental Use, and, 6) Discharged from Management.

**1. Scientific Use.** This category applies to any cultural property determined to be available for consideration as the subject of scientific or historical study at the present time, using currently available research techniques. Study includes methods that would result in the property's physical alteration or destruction. This category applies almost entirely to prehistoric and historic archaeological properties, where the method of use is generally archaeological excavation, controlled surface collection and/or controlled, systematic data recovery.

**2. Conservation for Future Use.** Allocation to this category is reserved to any unusual cultural property

which, because of scarcity, a research potential that surpasses the current state of the art, singular historic importance, cultural importance, architectural interest, or comparable reasons, is not currently available for consideration as the subject of scientific or historical study that would result in its physical alteration. A cultural property included in this category is deemed worthy of segregation from all other land or resource uses, including cultural resource uses that would threaten the maintenance of its present condition or setting, as pertinent, and will remain in this use category until specified provisions are met in the future.

**3. Traditional Use.** A cultural resource known to be perceived by a specific social and/or cultural group as important in maintaining the cultural identity, heritage, or well-being of a group may be allocated to this use. Cultural properties assigned to this category are to be managed in ways that recognize the importance ascribed to them and seek to accommodate their continuing traditional use.

**4. Public Use.** A cultural property found to be appropriate for use as an interpretive exhibit in place, or for related educational and recreational uses by members of the general public may be allocated for public use. This category may also include buildings suitable for continued use or adaptive use, for example as staff housing or administrative facilities at a visitor contact or interpretive site.

**5. Experimental Use.** This category may be applied to cultural property judged well-suited for controlled experimental study, to be conducted by the BLM or others concerned with the techniques of managing cultural properties, which would result in the property's alteration, possibly including loss of integrity and destruction of physical elements. Committing cultural properties or the data that they contain to loss must be justified in terms of specific information that would be gained and how it would aid in the management of other cultural properties. Cultural properties with strong research potential, traditional cultural importance, or good public use potential are not assigned to this category.

**6. Discharged from Management.** Cultural properties that have no remaining identifiable use are assigned to this category. Most often this category involves prehistoric and historic archaeological properties, such as small surface scatters of artifacts or debris, with limited research potential that is effectively exhausted as soon as the sites have been documented. Also, more complex archaeological properties that have had their salient information collected and preserved through

mitigation or research may be discharged from management, as should properties destroyed by any natural event or human activity. Properties discharged from management remain in the inventory, but are removed from further management attention and do not constrain other land uses. Particular classes of unrecorded cultural properties may be named and described in advance as dischargeable upon documentation, but specific cultural properties must be inspected in the field and recorded before they may be discharged from management.

### **Cultural Resource Use Categories and National Register Significance**

Cultural resource use categories are based in part upon requirements stated in the National Historic Preservation Act. This legislation requires the BLM to assess cultural properties to determine their historic significance, integrity and potential for listing on the National Register of Historic Places, and identify possible effects that any undertaking might have on cultural properties eligible for listing or listed on the National Register.

To be considered eligible for listing on the National Register a property must meet three broad qualifications: 1) Generally, it must be at least fifty (50) years old, 2) it must have significance or embody recognizable importance and, 3) it must retain historic integrity.

A property may embody one or more of several different types of values which represent the importance of a property and imply the reason that it should be preserved. These values are classified under the four National Register Criteria for Evaluation:

**Criterion A: Event.** Properties can be eligible for the National Register if they are associated with events that have made a substantial contribution to the broad patterns of our history.

**Criterion B: Person.** Properties may be eligible for listing on the National Register if they are associated with the lives of persons important in our past.

**Criterion C: Design/Construction.** Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a distinguishable entity whose components may lack individual distinction.

**Criterion D: Information Potential.** Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information in prehistory or history.

## **Appendix M – Cultural Resources Inventory Summary**

### **Cultural Resources in the Baboquivari Peak Wilderness**

The Baboquivari Peak Wilderness was surveyed for cultural resources in 2000. Prior to that time no formal, systematic surveys had been done in this wilderness. Three archaeological sites and six historical-period features were found during the survey.

A low site probability was predicted for this wilderness prior to the survey. This is directly based on the rugged, steep terrain that characterizes much of this wilderness area and is not typically a place where archeological sites are located. Areas characterized by small foothills and bajadas at lower elevations are places where the probability could be higher.

The sites documented during the survey consisted of a rock shelter, lithic scatters, a petroglyph panel, and segments of an historical-period grazing allotment fence built in the late 1930s.

Pottery sherds found at the rock shelter indicate that it was likely occupied between A.D. 950 and A.D. 1300. This site could have functioned as a seasonal resource processing area.

The rock art found during this survey is a single petroglyph panel depicting an anthropomorphic figure.

The historical-period grazing allotment fence segments are believed to be part of a drift fence system built by Tohono O’odham tribal members who participated in Civil Conservation Corps-Indian Division (CCC-ID) and Indian Emergency Conservation Work Program that took place during the 1930s. The fences run along the boundary between the Tohono O’odham Nation and the public land of the designated wilderness area.

The isolated features documented during this survey include Government Land Office (GLO) markers placed by Otis Gould of the U.S. Surveyor General’s Office in 1926, fire ring, and rock cairns of unknown origin and date.

### **Cultural Resources in the Coyote Mountains Wilderness**

A portion of the BLM-administered public land in the southeastern part of the Coyote Mountains Wilderness was included in the Coyote Mountains Archaeological

District Survey Project conducted by the Center for Desert Archaeology and Geo-Map, Inc. in 1989 and 1990. State, privately owned and federally managed public lands were included in this survey. A majority of the archaeological sites documented during this survey are located on private and state land. No other formal, systematic surveys have been conducted in Coyote Mountains Wilderness.

The archaeological sites located in this area date to Hohokam Preclassic and early-to-late Classic Period Hohokam occupation dating from about A.D. 200 through A.D. 1450 and include remnants of adobe and masonry walls surrounding compounds with central open space and several platform mounds. The sites here are important because they have the potential to provide noteworthy information about Hohokam demography, population fluctuation, social structure and change, social and religious ritual, agricultural development and technology, architecture, economy and trade, and possibly new information to help archaeologists understand why the Hohokam way of life ended.

### **Ethnographic/Historical Information**

The Baboquivari Peak Wilderness survey included proprietary interviews with eleven members of the Tohono O’odham Nation, and members of three local ranching families to collect ethnographic and historical information about the wilderness area.

### **Tohono O’odham**

Information obtained from the Tohono O’odham confirmed the continuing importance of the Baboquivari Mountains, and Baboquivari Peak in particular, in the lives of the Tohono O’odham people. The O’odham view Baboquivari Peak as the center of the universe (Mother Earth) and believe that it is the dwelling place of their creator, I’ittoi.

Today many O’odham visit this sacred place for purification, to pray, meditate and request I’ittoi to give them the strength to get through the many trials that this life places before human beings.

The Tohono O’odham described the importance of the Baboquivari Mountains as a place where ceremonies have traditionally been performed, especially ceremonies in honor of I’ittoi. Also stated was the fact that today many O’odham hunt, gather plants, and graze cattle in the mountains, and many regularly visit I’ittoi Kih (I’ittoi’s Cave) to pay respects to I’ittoi.

The Tohono O’odham people expressed the view that

all use of the Baboquivari Mountains, the peak and the wilderness should be accompanied by deep respect for the land, both for its environmental qualities and for its historical and spiritual importance to them, and hold to their cultural belief that all land, plants, animals, and cultural sites within the wilderness area are sacred and should be protected.

### **Ranching Families**

Interviews were done with members of three ranching families that have owned property adjacent to Baboquivari Peak Wilderness for many years. One family owns a large working ranch that has been in the family since the 1890s. One family has owned its property since 1945 and operates a guest ranch adjacent to the wilderness area. The third family has owned property adjacent to the wilderness area since 1983.

All of these interviewees were generally aware of the Tohono O'odham traditions associated with Baboquivari Peak. Two also knew of Mexican-American and Anglo-American traditions associated with the Baboquivari Mountains and their vicinity, especially the oral tradition of cowboys working in the region.

### **Traditional Cultural Property (TCP)**

Baboquivari Peak, including that portion located on BLM-administered land, meets the eligibility requirements for listing on the National Register of Historic Places as a Traditional Cultural Property (TCP). One of the reasons it is eligible is because it has retained its traditional cultural significance to the Tohono O'odham.

Guidelines for evaluating and documenting traditional cultural properties are defined in *National Register Bulletin 38*. As used in these guidelines the term "traditional" refers to beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practices. The "significance" of a property is derived from the role it plays in a community's historically rooted beliefs, customs and practices. A traditionally significant property may be a location associated with the traditional beliefs of a Native American group about its origins, cultural history and the nature of the world, and also a location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice.

Baboquivari Peak has retained this significance to the

present day through the role it plays in Tohono O'odham oral traditional, beliefs, customs, and practices. The earliest ethnographic references to Baboquivari Peak are contained in the journals of Jesuit Father Eusebio Kino which date back to the 1690s. Ethnographic literature produced by such scholars as Frank Russell (1908), Ruth Underhill (1938, 1940), and Bernard Fontana (1989) documents the presence and importance of Baboquivari Peak in the oral tradition and cultural practice of the Tohono O'odham.

# Appendix N – Summary of Phoenix Resource Management Plan (RMP) Decisions - PHOENIX RMP / EIS 1988

## I. SPECIAL MANAGEMENT AREAS

### A. Resource Conservation Areas

1. Designate the Baboquivari Resource Conservation Areas (RCA) covering 37,480 acres. Page 18. Map 2-4 on page 38 shows the RCA boundary.
8. Retain public lands (surface and subsurface estate) in seven Resource Conservation Areas. Page 18.
9. Consolidate public ownership and intensively manage lands in seven RCAs. Page 18.
10. Pursue acquisition of all state land in the seven RCAs primarily through exchange. Page 18.
11. Consider acquisition of private lands in the seven RCAs on a case by case basis. Page 18.
12. Acquire through exchange, non-federal mineral estate underlying federal surface holdings in the seven RCAs. Page 18.

### B. Areas of Critical Environmental Concern

1. Baboquivari Peak
  - a. Designate the 3,030 acre Baboquivari Peak Area of Critical Environmental Concern. Page 22. This area is shown on Map 2-14, page 50.
  - b. Develop an activity plan for the Baboquivari Peak Area of Critical Environmental Concern and manage for visual, wildlife, botanical and cultural values. Page 22.
  - c. Acquire 960 acres of state and private land in the Baboquivari Peak Area of Critical Environmental Concern. Page 22.
  - d. Initiate mineral withdrawal on all federal subsurface in the Baboquivari Peak Area of Critical Environmental Concern. Page 22.
  - e. Prohibit land use authorizations in Baboquivari Peak Area of Critical

Environmental Concern. Page 22.

- f. Close Baboquivari Peak Area of Critical Environmental Concern to motorized vehicles. Page 22.
- g. Prohibit surface occupancy for oil/gas development in the Baboquivari Peak Area of Critical Environmental Concern. Page 22.

### C. Recreation Management Areas

1. Designate the Coyote Mountains Recreation Management Area (if it is not designated as wilderness) with the following planned management actions: develop an activity plan; obtain legal access; prohibit land use authorizations; limit vehicular travel to designated roads and trails; acquire land; prohibit surface occupancy for oil/gas development. This area is now wilderness. This area is shown on Map 2-20, page 58.
  - b. Terminate the land classification and return to multiple use management 5,083 acres in the Coyote Mountains. This area has been designated as wilderness. Page 27.
  - d. Terminate the land classification and return to multiple use management 3,657 acres in the Baboquivari Mountains. This area has been designated as wilderness. Page 27.

## IV. COMMUNICATION SITES/UTILITY CORRIDORS

- n. Land use authorizations (right-of-way, leases, permits, easements) will continue to be issued on a case by case basis. Page 14.
- o. Rights-of-way will be issued to promote the maximum utilization of existing right-of-way routes, including joint use whenever possible. Page 14.
- p. Obtain legal access to the Baboquivari Peak Area of Critical Environmental Concern. Page 22.
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**For a complete summary, see the Phoenix Resource Management Plan and Final Environmental Impact Statement 1988 decisions summary available from the Tucson Field Office**