

**APPENDIX J**  
**MIDDLE GILA CANYONS AREA**  
**PUBLIC COMMENTS**

This appendix contains a summary of the substantive public comments received on the proposed Middle Gila Canyons TTMP and environmental assessment, and the BLM's response to those comments.

An e-mail message sent on March 8, 2009 to Middle Gila Canyons Conservation Partnership email group, with similar letter to adjacent landowners and BLM authorization holders announced the availability of the Proposed TTMP and EA with unsigned FONSI for a 60 day public review and comment period. The proposed TTMP information, documents and maps were made available on an Arizona BLM website page set up for the project. Tucson Field Office BLM employees were available for meetings on request, and attended meetings of the Pinal County Trails Association, Arizona Off Highway Vehicle Coalition, and Middle Gila Conservation Partnership to provide project information and answer questions.

Comments were received from 300 email correspondents and 30 postal letters from 03/10/09 to 05/12/09. The comments represented a variety of interests including those of adjacent land owners and management agencies, state and county government, authorization holders, recreation and conservation groups and individuals who use the area for recreation from throughout Arizona and out of state. Formal consultation with the USFWS on the proposed plan took place during the public review and comment period, with a biological opinion concluded in April 2010.

During the public review and comment period, project website monitoring shows a relatively low level of activity entering and leaving the project web pages early in the public review and comment period, increasing noticeably but remaining low later in the review period. Since the proposed TTMP information has been kept live on the main AZ web page, the project information pages continue to attract visitation. Given the low visitation volume during the public review process, adjustments are indicated to make this outreach effort more effective during plan implementation and future revision efforts.

All comments were reviewed and analyzed for substance and relevance to the proposed TTMP, and were considered in developing the decision on the proposed TTMP. Similar comments were combined and grouped with the responses. The emails and letters were not specifically replied to, but the information was considered in finalizing the plan and related documents, and arriving at a decision on the proposed plan. The substantive comments are summarized in Table J-1 below, along with the response or consideration given in finalizing the TTMP.

The comments resulted in updates to the proposed TTMP, factors in Appendix H, the Environmental Assessment, and related maps to provide clarification, adjust designations or add information. The planning area wide Transportation and Travel Management Map (Map 3) was updated to reflect the county road system according to declarations of the board of supervisors and pursuant to ARS-28-6706 for maintenance of primitive roads. This map displays the official BLM transportation system for the planning area, and related management designations to be implemented under the final TTMP. The map symbols for travel management designations and physical access inventory were changed to depict features only on public lands administered by the BLM, except for the designated "Public Land Access Routes"; these routes have segments that traverse non-BLM lands and are recognized as essential for access to the public lands from the public highway system for administrative purposes and public use. Township plats depicting the final TTMP designations and transportation network using published USGS 7.5 topographic quadrangles for the basemap were produced to depict the official TTMP at a scale with greater detail than the planning area wide map. These maps will be updated as necessary due to new

information from resource and land use monitoring, and as implementation actions are taken. These maps will be the key tool for educating public land visitors about the planning area's public access road and trail network, recreation opportunities, safety, regulatory compliance and low impact land use ethic, and will be made available to the public through a variety of media.

**Table J-1: Public Comments and BLM Responses**

| <b>Comment</b>  | <b>Response</b>   |
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| <p>BLM should not designate routes where they may be closed in the future in order to protect areas that might be considered for non-motorized special management in the RMP.</p>   | <p>Not designating routes because of potential future allocations that may be considered in a revised RMP would not achieve the purpose of the TTMP, which is to designate the BLM travel route network to accommodate allowable uses and prevent resource deterioration. The proposed designations in the TTMP do not forego options for RMP decisions at a later date.</p>  |
| <p>CEQ regulations state: “until an agency issues a record of decision...no action concerning the proposal shall be taken which would: 1. Have an adverse environmental impact; or 2. Limit the choice of reasonable alternatives.”</p>   | <p>The RMP that directs management of the Middle Gila Canyons area is not presently being revised, and the proposed plan is consistent with applicable decisions in the current RMP. None of the travel and transportation management designations were determined to have an adverse environmental impact, and none will limit the choice of reasonable alternatives available in a future RMP revision.</p>   |
| <p>BLM Land Use Planning Handbook guidance states: “if a decision on delineating travel management networks is deferred in the land use plan to the implementation phase, the work normally should be completed within 5 years for the signing of the ROD for the RMP”. Initiating a TTMP for this area is backwards, and BLM should first finish revisions to the RMP. This ensures that BLM has taken an interdisciplinary approach and allows the public to comment and participate more meaningfully in the process</p> | <p>The planning guidance referenced applies to new RMP development efforts. The proposed TTMP is needed at this time to establish the route network available for public motorized travel to address issues and concerns identified during the inventory, evaluation and ongoing management of public lands in the planning area. The proposed TTMP involved a process which provided numerous opportunities for a wide representation of stakeholders and disciplines, and was made available for public review and comment.</p> |
| <p>Martinez Canyon should be closed to address impacts on riparian and vegetation values and on, air, noise and water pollution. Potential toxic spills of hydraulic brake fluid, steering fluid, antifreeze, oil and gasoline pose hazards to wildlife and water quality. Consider Martinez Canyon for ACEC designation. Include a plan for implementation for appropriate signage and necessary monitoring and enforcement.</p>   | <p>ACEC designations are beyond the scope of the TTMP. An implementation plan will be prepared for the proposed designation that addresses signage and monitoring and enforcement efforts.</p>  |
| <p>BLM must take the necessary steps in the TMP to evaluate and provide non-motorized users access to regions of the planning area without conflicting with the quiet-use experience.</p>   | <p>The proposed TTMP identifies potential routes for developing a non-motorized trail system, including the Arizona Trail and trails identified in Pinal County’s Trails Plan. Abundant opportunities are available for non-motorized users throughout the area seeking to get away from roads and related</p>  |

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|  | activity, and will continue to be available under the proposed TTMP.  |
| BLM should prohibit off-road travel up to 100 ft. from designated routes for camping.  | Current BLM planning guidance for public lands outside units of the National Landscape Conservation System (Monuments, National Conservation Areas, and Wilderness Areas, for example) is to allow users to drive off the designated routes up to 100 ft. to camp. This could result in new turnouts created by campers, but soils, terrain and vegetation conditions on much of the planning area physically restrict the ability to drive off road, minimizing the potential for impacts. Monitoring will detect development of new roads, and follow-up action will be taken to prevent further resource damage. |
| Clear standards for special recreation permits should be set out in the TMP.   | Standards for issuance of SRPs can be found in the public land regulations. They are issued on a case-by-case basis based on the proposed activity, potential environmental impacts, consistency with management designations, and are subject to special terms, conditions and stipulations that may be required to protect resources and prevent conflicts. Detailed criteria for SRPs may be addressed in the RMP revision or in a programmatic environmental assessment for SRPs in the Middle Gila Canyons area, but is beyond the scope of the TTMP.  |
| BLM should undertake an analysis to consider the impact to and from climate change from travel activities, including impacts from motorized travel and recreation on climate change as well as the impacts of climate change on the resources of the planning area and how that may change management decisions.   | A discussion on climate change was added to Appendix H. Potential emissions of ‘green house gases’ related to current and projected use of motorized vehicles in the area’s BLM transportation system are expected to contribute negligibly to regional and global atmospheric conditions,. Fugitive dust emissions, also negligible, will be reduced under the TTMP nevertheless.  |
| BLM should close routes that are located in washes. Washes play a significant ecological role in this geographic area. Washes are the prime habitat area for both plant and animals while also allowing for water delivery to tributaries downstream. Allowing motorized travel disturbs not only the plant and wildlife habitat, but also can significantly affect downstream water quality and the downstream plant and animal habitat | The significance of washes for wildlife habitat and watershed values is recognized, and the TTMP includes an overall reduction of motorized use in wash routes. Impacts from motorized routes designated in washes will be minimized by implementing strategies identified in the TTMP.   |
| BLM needs to develop a more aggressive implementation schedule. It appears that there is very little in resources to actually implement the Plan in a timely manner (mitigation, route closings and signings, law enforcement and other implementation tasks).   | Implementation efforts will be subject to availability of funding. Funding will be pursued through a variety of means, including appropriated dollars, partnerships and grants, volunteers and contributions. Field Office operational plans have identified the need for a law enforcement Ranger with primary patrol area in the planning area and  |

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|   | vicinity.   |
| Protecting recreational users from accidents in old mine sites should be considered with proper mitigation measures.  | Abandoned/inactive mines on BLM land are being identified and evaluated for physical hazards. This effort will result in project plans to remediate hazards. A mine shaft along Box Canyon was barricaded and recently filled in following an incident resulting in injury to visitors.   |
| There seems to be little attention given to providing separate non-motorized recreational amenities. Given the fact that the Arizona Trail bisects the Plan area, it would seem to make sense to include more non-motorized trail opportunities from the perimeter of the Plan area to intersect with the Arizona Trail. Additionally, some of the closed roads would make good non-motorized opportunities as part of a larger non-motorized trails option, within the Plan area. Using some of the closed roads as non-motorized trails could be done as part of the closing and mitigation process for the closed roads. | The most pressing issue addressed by the proposed plan was designating the motorized route system. Non motorized trails were considered in the proposed plan, including development of the Pinal County Trails Plan. See Appendix H, and the proposed plan description. Non-motorized trails can be designated over time under the adaptive management provisions of the proposed plan.   |
| Rock crawling is an evolving sport with growing numbers of participants who like to keep the location of extreme trails (4.5 to 5.0 difficulty class) undisclosed to protect public safety and preserve the trail. Identifying rock crawling trails on BLM planning maps may cause bad trend in the etiquette of new rock crawling users.   | The proposed plan identified a number of OHV use sites to accommodate extreme OHV driving for skill and challenge over extreme obstacles. Increased public awareness of rock crawling opportunities can lead to attracting more use and could lead to changes in visitor behavior. The strategy in the proposed plan is based on managing these OHV use sites to accommodate the opportunities while protecting sensitive resources from damage. BLM will install signing at these sites that clearly identifies the risks involved in this activity, and will work with partners to provide additional safety and etiquette information. |
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| Overdose trail (Route # NW2095): provides unique, one of a kind and very important recreation opportunities to the extreme rock crawling community. We suggest leaving it open to motorized use, with appropriate signing. Clubs are willing to adopt this type of trail if there is any clean up or environmental impact to help preserve it for future and current users. We have been told too MANY excuses for the alleged support for closure to Overdose (NW2095). 1) Damaged a tree; 2) drove over vegetation (ONE Prickly Pear Cactus); 3) Too difficult; 4) TORTOISE Habitat; and now 5) Fox den.                  | This route (NW2095) was illegally created. It was examined by an interdisciplinary team in 2003, and the team concluded it had been recently opened by users by traveling off road and clearing/trimming vegetation. In addition to its history, it is proposed for closure based on a variety of factors related to the OHV minimization criteria (43 CFR 8341), especially as it relates to minimizing impacts on wildlife and wildlife habitat.  |
| Why is the entrance to Upper Woodpecker being moved?  | Upper Woodpecker entrance (route #NW2545A) is approximately 350 ft. in length and passes through a very narrow stretch bordered by bedrock outcrop  |

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|  | with petroglyphs. Entrance will be moved to a less sensitive area with less potential for resource damage.   |
| <p>The mill and stone cabin at Martinez Cabin/Canyon are historic artifacts, and the proposed plan would allow only hiker access, and not allow persons with disabilities to view the artifacts. Restricted use may be a reasonable compromise, with seasonal closures and seasonal open access. Then, if measurable conditions do not improve, consider additional restrictions or closure.</p> | <p>Martinez Cabin/Canyon: Includes routes #SW3003A, SW3003B. In addition to the historic stone cabin and mill, the area contains historic structures related to the Martinez Mine, the Columbia Mine and Silverbell Mine, riparian and aquatic habitat, a prehistoric archaeological site, seven other cultural resources sites, a number of artifact scatters, and occupied desert bighorn sheep habitat. Ongoing damage to these resources on BLM and private lands from motorized activity is occurring. Motorized use has been preserved within much of the Middle Gila Canyons area, with numerous opportunities for travel and other activities for person with disabilities. The proposed TTMP designated part of SW3004A to a point west of the riparian area crossing, approx. 0.6 miles from the cabin. Access beyond the closure gate would be on rough ground, and most persons with mobility impairments (requiring wheelchair or walkers) would not be able to use the route without assistance. The gate would be designed to allow bypass by pedestrians and wheelchair, but most of the route would be inaccessible to persons with mobility impairments. The description of the proposed action and potential impacts has been expanded. Access for persons with disabilities was considered in developing the TTMP; however, BLM cannot provide this type of access to all resources.</p> |
| <p>Desert tortoise is not a good reason to close Martinez Canyon; it not an endangered species. OHV trails do not allow the high speeds that would put the desert tortoise at risk.</p>  | <p>Management guidance is provided in BLM Instruction Memorandum (I.M.) No. AZ-2009-010. This I.M. outlines desert tortoise habitat considerations in management activities undertaken or authorized on BLM lands, including mitigation and compensation for loss of habitat. Habitat delineations factored into the route evaluation were completed by wildlife biologist, and surveys/studies for this species will be pursued under the proposed TTMP to improve knowledge and understanding of this species in this area, and identify adaptive management needs. Primitive roads in the planning area are typically rough surfaced, with highly irregular vertical and horizontal alignment, and limited sight distance and require users to travel at low speeds and be alert/attentive to road conditions. Risk of road kill is considered low, but possible. A speed limit of 25 MPH would be established for primitive roads on BLM land under the proposed TTMP, and maintenance guidelines would continue</p>   |

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|  | to promote low speeds on the area's primitive roads.   |
| Enact policies to control/prosecute (violators). Posted areas should be policed and enforced. Post historical/sensitive areas to help visitors' understand their significance.   | The TTMP will require increased law enforcement effort area wide to implement the designations and use restrictions. See text expanded under law enforcement section of TTMP. Interpretive signing for important/sensitive resources is included in the implementation and signing plan.   |
| Route SE4205C should remain open as it provides important access to this area north to the river. This route should remain open as it is the best access to the public land in this area via a maintained road to the radio tower. | Access to these features is provided by an alternate route (#SE4205) on more sustainable location and soils. SE4205C is steep, narrow and eroding, and with washouts. Vandalism attracted to the communication site may result in closure of the access to this route south of the communication facilities.   |
| Route SE4204A should remain open to administrative access to the Grayback wildlife water.  | This route was not addressed in the MGCP evaluation. The proposed plan did not designate it as a road or primitive road, but could be used by vehicle for administrative purposes under exception for authorized uses. The final TTMP designates this route as a primitive road for administrative use only.   |
| AGFD strongly supports closing all routes within Martinez Canyon and access via routes that utilize Martinez Canyon including routes SW3003A, B and SW3004A.   | The proposed TTMP designates the southwestern portion of SW3003A open to motorized use up to a point where topography provides a securable site for implementing a physical closure device.  |
| Route NW2072 is needed for sheep management purposes.  | Access to this route is across patented lands in Mineral Survey 3894, and comments from the landowners on the proposed TTMP are opposed to granting access to this route. The proposed TTMP identified it with a Reclamation objective. If AGFD needs vehicle access on this route and permission is obtained from the private land owners for that purpose an exception can be granted for administrative use provided such use will not result in damage to reclaiming vegetation and soils. |
| Route SE4100 provides access to an area heavily utilized by bighorn sheep and should be open to administrative use only, which may include for herd management by sport harvest.   | This route (0.4 miles) is designated as a primitive road in the proposed TTMP up to the State Trust land boundary. It accesses a range improvement and state trust land. It is a valley bottom, and no significant conflict with desert bighorn sheep habitat is expected. AGFD will need to work with the State Land Department to limit use of the route on State Trust land (approx. 2.24 miles) under current policy and procedures.   |
| Routes NW2045A and NW2045B should generally be limited to permit only or closed due to xeroriparian impacts and erosion concerns.  | This route was designated as an OHV site to provide specialized recreational opportunities. The proposed use would be subject to a site management plan, monitoring and mitigation to minimize impacts on resource values. The site management plan could consider a permit system for use of this route.  |

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| <p>Route NW2048A should be closed due to xeroriparian impacts, erosion, route density of the area and resulting habitat fragmentation, wildlife disturbance and displacement.</p> | <p>This route was designated as an OHV site to provide specialized recreational opportunities. The proposed use would be subject to a site management plan, monitoring and mitigation to minimize impacts on resource values. The site management plan could consider a permit system for use of this route.</p>  |
| <p>Close or limit route NW2051 to special use permit only with monitoring and adaptive management due to xeroriparian habitat, route density, fragmentation concerns.</p>         | <p>This route is proposed for special management to accommodate technical OHV use. A site plan and related surveys will be prepared to minimize potential impacts and conflicts. The route includes a section in desert wash bottom, and an upland section. It is expected to receive low speed, low volume traffic, and its effect on route density and fragmentation of wildlife habitat is considered low.</p> |
| <p>Close or limit route NW2052 to special permit and administrative uses only due to xeroriparian impacts and route density of the area.</p>                                      | <p>This route was designated as an OHV site to provide specialized recreational opportunities. The proposed use would be subject to a site management plan, monitoring and mitigation to minimize impacts on resource values. The site management plan could consider a permit system for use of this route.</p>  |
| <p>Limit route NW2002 to special permit and administrative use only due to true riparian habitat impacts.</p>   | <p>This route provides access to the historic townsite of Reymert, range improvements and mining claims. It was designated as a primitive road up to the townsite. A small riparian area with a fence enclosure is found beyond the designated route. Potential impacts to riparian habitat are not considered significant and will be minimized by the expected low volume primitive access.</p>                 |
| <p>Limit route NW2084B to special permit due to xeroriparian habitat, and erosion issues.</p>   | <p>This route was designated as an OHV site to provide specialized recreational opportunities. The proposed use would be subject to a site management plan, monitoring and mitigation to minimize impacts on resource values. The site management plan could consider a permit system for use of this route.</p>  |
| <p>Close route NW2084A due to xeroriparian and erosion issues.</p>  | <p>This route was designated as an OHV site to provide specialized recreational opportunities. The proposed use would be subject to a site management plan, monitoring and mitigation to minimize impacts on resource values. The site management plan could consider a permit system for use of this route.</p>  |
| <p>Limit route NW2050 (outside of Box Canyon) to administrative access and special permit only due to xeroriparian and erosion concerns.</p>                                      | <p>This route is a historic road in upper Box Canyon; it accesses mining claims, range improvements and recreation opportunities. It is designated as a primitive road in the proposed TTMP. Potential impacts are not considered significant, and any impacts will be avoided or mitigated.</p>  |

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| <p>Limit route NW2050C (outside of Box Canyon) to administrative access and special permit only due to xeroriparian and erosion concerns.</p>   | <p>This route is a historic road in upper Box Canyon; it accesses mining claims, range improvements and recreation opportunities. It is designated as a primitive road in the proposed TTMP. Potential impacts are not considered significant, and any impacts will be avoided or mitigated.</p>  |
| <p>Limit route SE4112 to administrative use only including for sheep management through sport harvest. Road impacts xeroriparian, riparian, and has erosion problems and passes through the ACEC.</p>   | <p>Route crosses Walnut Canyon and the BLM ACEC, but is not causing damage to the Canyon or the ACEC. It provides the only access to several sections of land, including range improvements and mining claims. It was designated as a primitive road in the proposed TTMP. Potential impacts will be avoided or minimized by implementation of the proposed plan.</p>   |
| <p>Close route SW3100 due to xeroriparian impacts from redundant route serving no transportation need.</p>  | <p>This route follows a broad sandy wash. It is designated as a primitive road in the proposed TTMP. Potential impacts will be identified through monitoring and minimized by implementing the proposed plan and adaptive management.</p>   |
| <p>BLM should install a gate accessible by permit for 3 years for access to Martinez Canyon (SW3003A, 3003B and SW3004A); review at that time. Only responsible users will go out of their way to obtain a permit, and permit system would allow for tracing who enters and when. It also allows for control of numbers entering.</p> | <p>Setting up permit requirement system is beyond the scope of the TTMP, but the designations made therein do not forego the option to consider a permit system in the future. Due to degradation of the area and the resources found in Martinez Canyon, BLM proposes to close the area to motorized use.</p>  |
| <p>Just being a “riparian” area does not support automatic closure. OHV would only be eliminated if they were specifically causing “ non-functioning or functioning at risk riparian issues” within Martinez.</p>   | <p>Motorized use through the riparian area has contributed to physical damage to vegetation and soils from driving off the existing road. Fencing , barriers and signing have been ineffective in keeping vehicles on this particular section of road. While the impacts affect a relatively small area, they are contributing to ‘functioning at risk’ conditions found there. The existing road travelway has downcut and now intercepts low flows in the channel. Additional improvements to the road and traffic controls would be required to safely accommodate vehicle use through the area with minimum damage.</p> |
| <p>A report from an outside biologist was sent to the Tucson BLM office over a year ago reflecting “NO significant OHV impact within Martinez Canyon”.</p>  | <p>The riparian area along Martinez Canyon was determined to be functioning at risk by a BLM interdisciplinary team in March 2001, and conditions have deteriorated since then causing changes to the drainage channel and roadway, with a spreading of OHV impacts. Strategies recommended to preserve riparian function were restricting grazing use in the riparian zone, and reducing impacts from recreational use including use of OHV. The report submitted by the Arizona OHV Coalition (Martinez Canyon and Lower</p>  |

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|   | <p>Woodpecker OHV Proposal, Arizona Virtual Jeep Club and Arizona Off Highway Vehicle Coalition, Chris Radoccia and Dawn A. Holt, BS Biologist, Natural Resource Management and applied Ecology, January 20, 2007) was reviewed and considered in developing the TTMP. The report describes the recreational value of these two routes, the impacts observed during a site visit in November 2006, recommendations on necessary mitigation, and suggestions for management to include outdoor recreation and human activities. The recreation value of these two routes is recognized by the BLM. The impacts indicated in the report are factual, though understated. Many of the recommendations for management in the report are applicable generally, and will be pursued in the area's recreation management program. However, resource damage in the Martinez Canyon associated with the inventoried access routes (#SW3003A, SW3003B) is occurring to riparian habitat and cultural resource values, with the trend towards deteriorating conditions. Resource damage and related issues related to these routes are relatively complex, and will take further study and management consideration of multiple use resource allocations. In the meantime, travel management efforts will focus on providing for extreme OHV activity opportunities in the identified specialized OHV sites in the planning area; developing site surveys and site management plans and on the ground actions for those, and carrying out related user education and involvement programs with OHV recreation interests. Cultural resource damage in the 'Lower Woodpecker' (#NW2082) has occurred, continues to occur, and is practically inevitable with continued rock crawling traffic through the area; the recommended mitigation measure to install barriers to physically prevent vehicle entry to the vicinity of the cultural resource features would itself alter the integrity of the site. Therefore, closing this route to motor vehicle use is necessary to protect fragile resources.</p> |
| <p>State BLM Fish specialist reported to the MGCP that OHV was NOT interfering with the fish.</p> | <p>Motor vehicle traffic was not occurring through the aquatic habitat in the area at the time of the fish reintroduction project. Terrain conditions prevent traffic, and fencing helps keep vehicles on the road. Possible water quality impacts from toxic fluids potentially released from vehicles maneuvering on extreme road conditions was considered in the fish reintroduction, but the risk was considered to be low.</p>   |

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| <p>OHV offered a number of years ago to help "bridge" the spring crossing with natural materials approved by both BLM and FS on a nationwide approval. OHV would pay for it.</p>  | <p>Discussions among MGCP members and other dating back several years included making improvements to the road through the riparian area. The BLM considered making improvements in 2008 (CX #AZ-420-2008-021), but decided to defer the project subject to decisions to be made in a comprehensive TTMP for the area. The route involved in the project was not in the proposed TTMP, foregoing the need for the work in the foreseeable future, though damaged road conditions persist.</p>   |
| <p>There are "habitat" areas across the state. If BLM was to be consistent across the board there would be "no trails anywhere". This claim is not substantive support for closures without SIGNIFICANT habitat or damage to such by OHV.</p>   | <p>Habitat areas outside the planning area are subject to multiple jurisdictions and land use management for those areas. The travel management designations for this planning area are based on uses, resource values, site conditions, land use decisions, and other factors directly involved. Cumulative impacts were not assessed in a state-wide context for these resource values.</p>   |
| <p>If the private lands are truly an issue for BLM then a NO TRESPASSING sign needs to be placed at the private lands border by the land owners or BLM needs to post an interpretive / information sign at this border. It is not BLM's ability or authorization to close a trail to BLM lands because private land owners don't like it.</p>   | <p>Conflicts related to private land in the area are one of the factors considered in the proposed TTMP designation for this route. Survey benchmarks have been located for the private lands, and BLM will work with stakeholders to provide appropriate signing. Public use on public lands is allowed up to the private land boundary, subject to use restrictions in place for those public lands. The signing plan for the area was updated to include interpretive and information signs in this area. BLM would work with adjacent land owners to alleviate potential conflicts with public use of non-BLM lands (private, State Trust, National Forest)</p> |
| <p>Keep Overdose (NW2095) as one of few truly technical trails. Place winch rings along course as well as signs. It already has a self made Rooky Filter. Following an incident of a dead tree being pulled down several years ago, OHV suggested that BLM place "winch rings" in this wash to eliminate vehicles having to winch themselves from trees or surrounding rocks. OHV offered to pay for and install these rings. Several surrounding states use them on technical trails. Nothing was ever followed up on.</p> | <p>This type of measure would be considered in the site plan for designated 'OHV Sites'. Winch points were not authorized at the time pending decision on route designations for the area.</p>  |
| <p>All of the technical trails should have "winch points" installed.</p>  | <p>Winch points would be considered among other needs or issues in the site plans that will be prepared to implement management on the 'OHV Sites' identified in the proposed TTMP.</p>   |
| <p>MS3894 is not on private lands although we have spoken to the mine owner just outside the entrance to this trail on numerous occasions and they had</p>  | <p>Multiple private land owners in the area (MS3894) submitted comments on the proposed TTMP, and they object to public use on or across the private</p>  |

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| no problem with vehicles there.  | land east of this location.  |
| OHV have had a private biologist walk Overdose (NW2095) finding NO “burrows” representing tortoise and no sign of any fox den.   | No reports were submitted to the BLM for private desert tortoise surveys in this area. No BLM desert tortoise surveys have been conducted for this route. Denning habitat was identified in the ground examination by an interdisciplinary team in 2003.   |
| There is the possibility to “remove/relocate” any tortoise that may be within this wash. It has been done by a federal land manager.   | This is an operational practice for permitted uses required to apply handling guidelines for desert tortoises that may be encountered.   |
| Another settlement is to require a “spotter” to walk the field ahead of any vehicle. This has also been done by a federal land manager.  | This is an operational practice for permitted uses.  |
| Sign Woody’s Wash (NW2080) as a technical trail with recommended and required equipment. Not a good place for a gate but trying a “sign in” box along with “standards” might be a way to encourage responsible use. Possibility of a “Rooky Filter” at the entrance to help keep out the novice or unequipped. There is no resource damage within this trail. It traverses from a wash/road at the bottom to a graded road at the top of the hill. This trail has been used for many years. It shows clearly on a 1968 aerial map. | See route detail map. This route was designated for restoration in the proposed TTMP. An assessment is planned to determine the impact of off road vehicle use on this route since it was initially examined as part of implementing the proposed TTMP. This trail was opened by users around the time of the physical access route inventory. It was examined in 2003 by an interdisciplinary team and determined to have been recently opened based on the condition of the soils and vegetation, including freshly cut branches and limbs on trees. A steep climb has developed at the eastern end of the route, which is causing new erosion. Use of this route since it was opened is in violation of current use restrictions. The wash channel is discernible in aerial photography because of its width and surface conditions (gravels, cobble, rock). The signature of washes is similar to those of a road in color and reflectance, but not conclusive evidence a wash is receiving traffic. The mining claimant in the area noticed evidence of vehicle use in the spring 2003. |
| A small tree was cut down several years ago evidently to make the traverse easier through Woody’s Wash (NW2080) but it certainly had nothing to do with “opening” this trail as the anti-access folks claim. BTW: This tree is healthy and growing today.  | Route conditions were photographed in 2003, showing more vegetation trimming, cutting, removal than one small tree, without which it would not been possible to drive through.   |
| During the Decision Tree there were no reports of tortoise habitat or study areas, or a wildlife preserve area on Woody’s Wash (NW2080).   | This route is within Category 3 desert tortoise habitat, which was a factor in the MGCP route evaluation and noted as such in the Route Reports (See Appendix B). This was also considered in developing the designations in the proposed TTMP.  |
| Trail ratings should be considered:<br><i>Technical:</i> H2H; Upper Ajax; Axle Alley; Overdose; Martinez (beyond the cabin if open by permit and agreement with land owners can be worked out)<br><i>Hard:</i> Upper Woodpecker; Elvis; Bad Medicine   | Trail ratings by users were considered in evaluating the type of recreation opportunities available in the area. See Arizona OHV Recreation opportunity assessment completed in response to public comments on the proposed TTMP.  |

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| <i>Moderate/Hard</i> : Jack Handle; Orville's Loop,  |   |
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| At the presentation to the MGCP I suggested to BLM that because it was recommending closure of Overdose and we (OHV) had recommended Broken Ankle be closed because of the dual challenge, I asked if we could "make Broken Ankle into a technical trail". BLM noted this on his map and never mentioned the issue of "tortoise habitat".                                    | The suggestion was noted. This route is within Category 2 desert tortoise habitat (route reports indicate Category 3 in error), which was discussed during the MGCP route evaluation and considered in developing the designations in the proposed TTMP. Maps of the desert tortoise habitat categories were available during the MGCP evaluation and related discussions.  |
| There are no "trail numbers" on the maps but I noted to BLM several sections off Sandman Rd and near the top of Elvis that reflect closure that should be open to accommodate the ATV or bike riders by not forcing them on to major roads. Please take a look at small sections that are being closed and allow for them to be ATV or "tot lot / family" sections or loops. | Sandman Rd. is a low volume, low speed road suitable for mixed traffic. Nevertheless, most of the inventoried routes along this route south of Mineral Mtn. are designated to accommodate motorized use, preserving a number of options for making short loop trips without using Sandman Rd. Only a few routes are identified for closure and through monitoring and adaptive management the opportunities in this part of the planning area may be reconsidered in the future.  |
| Battle Axe Rd should be designated as a 'major' route from SR177 to Martinez Canyon; provides extremely important and vital access to the mineral mtns and most of the dbs habitat for herd monitoring activities and eventually hunting.  | This road is identified as a 'Public Land Access Route' in the proposed TTMP.   |
| Add provisions to plan prescribing possible rerouting of road sections that might be closed off because it crosses Asarco property on the east side and State land on the west side; either party could restrict access in the future and this possible situation should be addressed in the plan.   | Preserving continuity of Battle Axe Rd. is addressed in the Ray Land Exchange EIS, with realignment of the SR177 intersection anticipated, and possible realignment south of the White Canyon Wilderness west of Walnut Canyon. The Asarco property in Walnut Canyon is planned to be transferred to the US under the land exchange. Under the proposed plan, legal public access will be a priority to pursue across non-BLM land on routes designated 'public land access routes' in the plan, including Battle Axe Rd.   |
| Portion of the Battle Axe rd will require considerable maintenance to allow motorized use and relatively safe passage with conventional 4x4 vehicles.  | Battle Axe Rd is proposed for designation as a primitive road for different design vehicles depending on the section. The section off SR177 design vehicle is a haul truck (truck-trailer combination), the section west to the vicinity of Cochran design vehicle is a standard high clearance 4WD, and the mountainous section west of Cochran to Martinez Canyon is planned to remain extremely rough, and more suitable for ATVs than stock 4WD vehicles. Maintenance will aim at correcting drainage problems and erosion, but not upgrading the road on the primitive sections. |
| Maintain the Cochran river ford to access Battle Axe Rd from the south when river is low.  | An existing Gila River ford crossing at Cochran is identified in the TTMP. As planned, the crossing   |

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|  | would remain a low water ford crossing.   |
| The two roads (SE4104 and SE4102) accessing the Rincon from the Battle Axe Rd should be left open to motorized use For monitoring or a supplemental release  | SE4104 is a route up a wash, climbing out to a dead end, and with natural reclamation in progress. SE4103 was to be used for the Arizona Trail but the trail alignment has been changed and this route is no longer needed for the AZT. In the final plan, a change in designation for SE4103 will designate it open for motorized use to make a loop with SE4102. This loop will provide access for hunting and primitive camping, and management activities related to desert bighorn sheep.  |
| Leave SE4100 open for access to manage and monitor desert bighorn sheep.   | The route SE4100 segment on BLM land was proposed as a primitive road for resource access by ATV. The rest of the route on State Trust land is not subject to BLM travel management designations.   |
| Restrict domestic goats and sheep for pack animals. Expand the restriction to include llamas.  | Llamas are not known to be vectors for transmission of disease to desert bighorn sheep; therefore, no need to prohibit them at this time. Should new information reveal there is a concern, management designations can be adapted to include this use restriction. The “Revised Guidelines for Domestic Sheep and Goat Management in Native Wild Sheep Habitats” used by BLM in bighorn sheep habitat are applicable to pack animals also.   |
| 17 miles of non-motorized trail and 180 miles of existing inventory route closed under plan. Not clear that there are uses of non-motorized trails that are not allowed on the other closed roads (clarify). | Routes designated in the TTMP for ‘Non-Motorized Trail’ would be managed to provide for non-motorized travel and maintained for trail use, and legal access pursued where necessary. Routes designated ‘Closed’ would be allowed to reclaim by natural processes, or may be actively reclaimed. Closed routes would remain open to foot and horse traffic which is allowed cross country travel, but would not managed as non-motorized trails unless their designation is specifically made for that purpose; trail maintenance will not be allowed on closed routes unless they are designated for that purpose |
| Administrative /management access should be allowed on all closed roads on a case by case basis, for sanctioned activities only.   | Administrative access is an exception under the regulations for travel management designations (43CFR8340), and may be allowed on a case by case basis for authorized uses and activities.  |
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| Close all Martinez Canyon (SW3003A, 3003B and SW3004A) routes but allow for administrative and private property use; critical to protect wildlife and cultural resources.                                    | Administrative and land owner access by vehicle beyond the closure point may be permitted on a case by case provided no resource damage occurs.   |
| Rock crawling or extreme OHV is inherently   | Rock crawling is recognized as a legitimate   |

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| <p>destructive and causes resource damage in all places. Oil and other chemical spills, rubber from tires in water courses, and defacing natural objects. All rock crawling routes should be closed.</p>  | <p>recreational activity on BLM lands in appropriate places. Special OHV Sites proposed to accommodate this type of use will be subject to site specific plans to minimize resource damage and the concerns mentioned. Several sites where this activity is considered inappropriate are closed to motor vehicle use under the TTMP.</p>  |
| <p>All unnecessary wash travel is detrimental to wildlife. Xeroriparian areas are sensitive to soil compaction and vegetation damage; all but major access routes in washes should be closed to motorized use.</p>  | <p>The extent of wash and xeroriparian routes on BLM lands is reduced by approximately 47%, in the proposed TTMP. Routes proposed for motorized use in washes are considered necessary; some will require site specific management plans with surveys and studies, and adaptive management to minimize impacts.</p>   |
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| <p>Request that BLM reconsider the designation for NW2045B and NW2050C because they extend onto Forest land where they are unauthorized routes. These routes lack archaeological and biological resources clearance, are not engineered for safe public use, and there are abandoned mines in the area.</p>                           | <p>These routes are an important access connection making a loop with the proposed public land access routes. These routes are needed to continue providing OHV recreational opportunities related to the routes on BLM land. These are existing routes; single lane and primitive, narrow, on mountainside conditions with limited maneuvering space but they are considered suitable for the type of use they are receiving. Traffic volume is very low, and users are typically experienced technical-extreme 4WD and ATV, and familiar with conditions found on these routes, which are part of their attraction. Authorization by the Forest Service would be pursued under the BLM TTMP, subject to site-specific archaeological surveys and environmental review, with mitigation as needed. If National Forest decision on the proposed routes is to close them, then on the ground signing and barricading will be pursued at the BLM/Forest land boundary. The final TTMP map will note the loop connection is conditional on further study and National Forest approval for these routes. As a connected action, the mileages involved are included in the summary of the proposed action and analysis (involves approx. 2 miles of primitive, extreme class route).</p> |
| <p>Give details on how the enforcement of the new plan will be implemented? How many deputies will be assigned to the area? Believes lack of enforcement of current laws is the biggest problem. Will there be any avenue for enforcement by the general public? If reporting license plates, pictures of offenders are passed on</p> | <p>Law enforcement, visitor education, visitor information materials and signing will be used to promote compliance with the plan designations and use restrictions. Enforcement will be cooperatively among BLM Rangers, Game and Fish Officers, and county Sheriff. The plan will result in designations and use restrictions on public lands that will be</p>  |

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| <p>to BLM, will they at least send letters? Will any other agencies be involved in the enforcement – State, County, City?</p>  | <p>enforceable under public land laws, with penalties for violations in accordance with 43CFR9260. Law enforcement Rangers in the Gila District will be assigned to the planning area for patrols, with the number depending on available resources and priorities on a field office wide basis. During the initial implementation period of 1 to 2 years, special emphasis will be given on increasing law enforcement presence in the area. Public land users may report violations to the appropriate agency depending on the offense.</p>  |
| <p>Proposes a gate that requires monthly combination to open. Combinations available at no cost from the BLM. This system has worked well in the Bulldog Canyon area (Tonto National Forest). Would be happy with a pay permit system that limited the number of vehicles on any given day.</p>  | <p>Public comments suggesting a locking gate to control access but allow public motorized access is not adopted in the TTMP; this suggestion was made regarding Martinez Canyon particularly. No permit system is being established under the TTMP; this is beyond the scope of the TTMP. No use allocations or limits on use are being established in this plan; this is also beyond the scope of this plan. Permit systems, use allocations and controlled access strategies may be considered in the general Resource Management Plan for public lands when it is revised, or a separate plan addressing uses requiring a special recreation permit pursuant 43CFR2930.</p> |
| <p>Proposes a designated access road across the riparian area could be fenced to ensure OHVs stay on the designated trail.</p>   | <p>Fencing along the road through the riparian area (in Martinez Canyon) was considered among the alternatives evaluated. Short gap fencing installed several years ago upstream of the spring was ineffective in keeping vehicles on the main travelway.</p>  |
| <p>In short term would like to see the trail kept open up to the private property line. Signs fencing and natural obstacles could stop OHV travel beyond that point. This would provide access to a large section of the trail and some of the best views. In the long term BLM should pursue a right of way or purchase of the private land, in conjunction with donations from OHV community for the purchase.</p> | <p>The (Martinez canyon) trail has been kept open. Concerns with vandalism, resource damage, and trespass led to the proposed closure to vehicle use. Pursuing legal access across the private lands would alleviate one of the concerns, but not the other concerns. The closure to vehicle use on this route was proposed due to resource damage; this includes impacts to the riparian area near the spring, damage to historic properties, and damage to a prehistoric site.</p>   |
| <p>Private land owners in group of patented mining claims in T3S R11E Sec 11 Mineral Survey #3894: proposed plan and information therein should not be disseminated to the public.</p>   | <p>The private land parcels are surrounded by BLM lands, with existing physical access routes crossing the private lands. The conflicts and potential problems of public use on intermingled private lands is an issue the proposed plan aims to address through the proposed management designations and other proposed actions. No routes across, or other features on private land, will be depicted on the visitor information materials resulting from the</p>  |

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|  | TTMP.  |
| Roadways on private property are grossly widened and altered by the general public; this change is a result of the proposed plan.  | Conflicts with private lands and trespass from public use in the area are issues that the proposed plan aims to accommodate, along with providing access to the private lands. Public use in the area was occurring when efforts to address related concerns began, and has continued unmanaged since then.  |
| “No Trespassing”, “Private Property”, Danger Keep Out” and other signage and barb wire fencing around mine shaft are continuously destroyed and removed by the public and those involved in the planning, which is regarded as a lack of respect for private land.   | The BLM agrees public use in the area generally is causing damage to the land and property, including signs and others.  |
| The proposed plan and EA are creating a serious nuisance and exposing the general public to hazards and harmful conditions by: <ul style="list-style-type: none"> <li>a. Encouraging general public use</li> <li>b. Designating usage on and through private property</li> <li>c. Enticing the public to trespass on private property</li> <li>d. Proposing a hiking trail to a public campsite that can only be reached by crossing private land</li> </ul>   | The proposed plan and EA is not creating the problems. The problems and concerns are caused by public use in the area. The plan is an effort to address the problems and concerns in a comprehensive manner, and a disclosure of the proposed strategies to address those concerns.  |
| Requests modifications to the TMP and EA: <ul style="list-style-type: none"> <li>a. Remove references and designation of the trail to the campsite at the end of the abandoned private road east of the private property.</li> <li>b. Add label on private lands “Private Property-No Trespassing”. Remove details or references of private roads, washes, and mine shafts in all maps and reference materials used by the BLM.</li> <li>c. Provide, place and regularly maintain official BLM signage on BLM property at all road/OHV trails and washes entering private property. Signage shall declare the public land boundary and inform travelers on roads that dead end on private land (about 14 crossings, or more).</li> <li>d. Where Martinez Canyon Road crosses the southern part of the private property, post signs stating ‘Entering/Leaving BLM lands’.</li> <li>e. Where the N.Box Canyon Rd crosses the northern part of the private property, post signs ‘Public Property ends’, and create a turnaround.</li> </ul> | See final TTMP documents for edits to text and maps. <ul style="list-style-type: none"> <li>a. Transportation planning or designation maps made available to the public will not show routes across private land unless there is an easement, right of way or other legal instrument or agreement on a given route. The route in question (#NW2072, T3S R11E Sec. 12) will be designated closed to motor vehicle use, and allowed to reclaim as proposed. The camping opportunities on the public lands along this road were considered in the route evaluation and thus are shown on the proposed plan. Camping opportunities will continue to be available, but existing dispersed campsites will not be shown on agency maps.</li> <li>b. The private lands will be annotated on the final transportation plan with “Private land-No Trespassing”. No features on private land will be shown on the private land, with the exception of those on published USGS topographic maps when such maps are used as the base maps; the USGS maps will not be edited.</li> <li>c. The proposed plan includes signing of BLM</li> </ul> |

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|   | <p>boundaries along roads and trails. These will be installed at or near the property boundary on BLM lands, and will cooperate with land owners on appropriate signing. However, private land owners are responsible for posting their private property with no trespassing signs.</p> <p>d. Entering/Leaving Public Lands signs will be posted where Martinez Canyon Rd. (#SW3002B) crosses the private land. See map attached.</p> <p>e. Public Land Boundary signs will be posted where the N.Box Canyon Rd (#(NW2050) crosses the northern part of the private property. This road is shown on USGS topographic maps up terminating at an adit on private land. The USGS topographic maps will not be edited under this project. No improvements are planned at the private land boundaries.</p> |
| <p>Comments stated serve as the required notice that without corrective actions and litigation, so catalyzed, hereafter, for personal injury to any member of the public upon the private property will result in derivative litigation naming the BLM, and others.</p>   | <p>Noted.</p>   |
| <p>Draft planning maps circulated with the subject draft plan depicted unpermitted OHV staging areas, shooting ranges and dispersed campsites, abandoned/inactive mine sites on Arizona State Trust Land. ASLD is extremely concerned that a large number of routes are identified in areas immediately adjacent to unsecured abandoned/inactive mine sites, formerly used defense sites and areas of cultural significance. Rangeland improvements are the private property of our lessees and should not be depicted on these maps without written permission from the owners. We ask that these routes and features be deleted from Trust land parcels in the final planning maps.</p> | <p>The draft planning maps initially made available with the proposed TTMP showing physical access routes and various other features on State Trust lands were removed from the website. The maps were reissued without the features the ASLD requested not be shown. Only the routes proposed as ‘Public Land Access Routes’ are shown across State Trust lands, hydrography, hillshade, and township/range/section lines. Final maps for public distribution will show features and designations on public land only, though they may be depicted on published USGS 7.5’ topographic quadrangles for geographic context.</p>  |
| <p>Proposed TMP does not provide information as to why an exception will not be granted for hunters to retrieve lawfully taken game, especially big game animals.</p>   | <p>An exception for motorized game retrieval is unnecessary due to the rugged terrain and the harvestable species of big game. Moreover, off-road vehicle travel to retrieve game may cause unacceptable resource damage in arid and semi-arid ecosystems and may lead to the development of new unauthorized routes. Additionally, cross country motorized travel on BLM lands is currently prohibited. Given the game species found in the area, the terrain conditions in the area, and the extensive network proposed for motorized access, the BLM believes there is no need for allowing</p>  |

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|   | cross country travel on BLM lands for game retrieval purposes.  |
| Proposed TMP does not address how hunting opportunities will be affected by this decision.  | Hunting opportunities will continue to be available in accordance with Arizona hunting regulations. Access for hunting will continue to be accessible through the proposed road and primitive roads and trails. Areas without motor vehicle access, or with access over ½ mile from a motorized route will increase slightly, improving the habitat quality for some game species, and slightly increasing the hunting areas with non-motorized qualities preferred by some hunters.  |
| Restricting motorized game retrieval runs counter to EO #13443 “Facilitation of Hunting Heritage and Wildlife Conservation”. The Executive Order directs appropriate federal agencies “to facilitate the expansion and enhancement of hunting opportunities.” Restricting the use of motorized vehicles to retrieve lawfully taken game would not facilitate the expansion and enhancement of hunting opportunities, including those for senior hunters and those with impaired mobility. | The dual purpose of the August 16, 2007 EO #13443 is “to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat.” The proposed route designations will officially establish a motorized access route system designed to provide motorized access throughout the planning area, with access to most of the public land base within 1.5 miles of a motorized route. This will provide reasonable access for hunting the game species found in the area. Special exception for access to hunting opportunities for senior hunters and those with impaired mobility may be granted under a CHAMP permit, administered by the AGFD.  |
| Page S of the Summary Plan, paragraph a: WHO will be responsible for maintaining roads? Will all roads be maintained "annually" as stated?  | Road maintenance of BLM roads (and primitive roads) will be according to the proposed maintenance intensities and maintenance guidelines in appendix D of the TTMP report. Routes designated as ‘Roads’ likely will be maintained annually depending on condition. Routes designated as ‘Primitive Roads’ will be maintained on a 3 to 5 year cycle depending on condition, after an initial round of work to control road drainage and stabilize erosion. The BLM is responsible for maintenance of BLM roads, unless the responsibility is assigned to others (right of way, special use permit, maintenance agreement). Quarry haul roads will usually be maintained by the quarry operator. Ranchers may do minimal maintenance on roads needed for use/operation authorized under the grazing permits. |
| What if we don't want roads to be improved unless it's a safety issue or resource issue?  | No specific road improvements to higher standard are proposed for the initial implementation period (3 years). Maintenance of the proposed road work is aimed at keeping the roads primitive and rough, while correcting drainage problems and stabilize  |

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|  | <p>erosion, alleviate potential fugitive dust; obvious safety hazards will also be corrected but the condition of the routes will remain rough, narrow, winding, slow speed and relatively low volume). The design or access vehicle for nearly all the BLM routes is a 4WD high clearance vehicle, with a few routes entering public lands accommodating hauling trucks and trailers, and passenger cars. The road system is intended to be maintained in a primitive rough condition. Primitive road maintenance guidelines were included in the proposed TTMP (Appendix D) which outline the desired condition for three types of road: road, semi-primitive road, primitive road and extreme primitive road; implementing these guidelines will ensure that road improvements are not carried out without careful consideration of the need to do so.</p> |
| <p>Page 5 of the Summary Plan, paragraph b: What are "primitive roads"? How do these trails apply to the stated "annual maintenance"?</p>  | <p>The definition for a primitive road is in the plan Asset Types, page 5-6. Primitive roads will be checked annually for drainage problems and erosion and maintenance work will be done to correct problems (washouts, dust control if required). Generally, only the minimum amount of work necessary will be done.</p>  |
| <p>WHY 139.3 miles of CLOSED ROUTES? My concern is by closing this amount of existing trails it only puts more impact on the trails remaining open and it looks as though the ATV's and bikes have fewer places to ride thusly putting them on the 4x4 technical trails or major routes. This is a safety issue.</p> | <p>The routes proposed for closure serve very limited access purpose, are in sensitive areas, or trespassing on the railroad. The proposed designations will provide extensive opportunities for OHV use throughout the planning area, including alternate routes to the main access roads, which themselves are low volume and suitable for mixed traffic.</p>   |
| <p>Are there any plans to designate trails only to ATV's or UTV's or bikes?</p>  | <p>Not at this time. Routes could be designated for specific vehicle types later in response to trail proposals on a case by case basis.</p>  |
| <p>Page 6 of the Summary Plan, paragraph c: Please explain the last paragraph relating to 12.6 miles of routes related to rock crawling to be identified as specialized recreation sites? Does this mean that in the area of the trail the sides or rock obstacles are part of the trail?</p>                        | <p>A site plan (route/trail) plan will be prepared with users/interested parties to accommodate technical OHV use with minimum impact; the site plan will identify important features along the route including obstacles, access points, 'off limits' areas, restoration areas, signing, or whatever is needed.</p>  |
| <p>Page 7, paragraphs 3 &amp; 4: you refer to route widths, intensity, surface, curves etc..... Why would you enhance the problems with managing these issues by closing so many miles of trails. It seems most of the trails on the ground today are due to "supply and demand". These numbers will not lessen.</p> | <p>The physical character of the existing routes in the planning area was considered in the proposed designations because they are important to their accessibility and use, the recreational setting, the type of access they can accommodate, and the overall impact of the routes. The character of the routes can change over time as land use changes, and by addressing these variables the designations will guide maintenance efforts to ensure the minimum standard is applied to accommodate the</p>  |

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|   | intended uses. It will also facilitate evaluation of future road improvement proposals, and development of special mitigation measures or requirements.  |
| Will OHV vehicles be restricted from major ingress/egress routes that "hauling trucks" use? If so how will the recreational vehicles be warned?     | All public land roads will remain open to all motor vehicle use, subject to the physical conditions of a given road. The proposed road functional class, vehicle type and maintenance guidelines (Appendix D of the proposed TTMP) would prescribe the condition of the route system, which is initially designed to accommodate current uses. As land use changes over time, some roads may be proposed for improvement, and any potential conflicts with public recreational use will be addressed and resolved. Roads used by quarry haul truck traffic may be posted with signs. |
| Page 9, paragraph Sb: I don't find specific plans or proposals regarding the Great Western Trail. Is it specified on the maps?                      | The main route and side routes on BLM for the GWT are accommodated by the proposed primitive road designations, and the GWT is mentioned specifically in the TTMP. Routes designated in the TTMP could be included by the AGWT in trail visitor information materials, and directional or informational signs could be posted under a cooperative project agreement. The route on non-BLM land is a connected action, and therefore included in the assessment. Authorization for use of routes across non-BLM land will be up to the GWTA to secure.                                |
| Page 3, paragraph Sc: How do the Pinal County Trails along the river affect OHV recreation? Can OHV no longer access camping sites along the river? | A project plan will be required to implement Pinal Co. trails plan. The trails plan will identify the alignment for the trails, using existing disturbance wherever possible. Any potential shared use (motorized and non-motorized) or conflicts will be resolved during the trail development project planning. Primitive road access is proposed to dispersed campsites along the south side of river in vicinity of BoxO Wash and Cochran, preserving river access.  |
| Will there be any approved river crossings for OHV?   | The proposed TTMP includes a Gila River ford crossing at Cochran, where a crossing has existed for many years. It is accessed from the Cochran road, over the Copper Basin Railway (CBRY) and through the 'tunnel' road. The ford crossing and related river access are contingent on permission from the CBRY for railroad grade crossing. Another river crossing will be available over the Florence-Kelvin Highway bridge.  |
| Page 11, paragraph 2: WHO makes the site plans? Many of the "OHV SITES" shown on the maps are simply 4x4 trails. They are not technical trails and  | The site plans for the technical OHV sites will be prepared jointly with interested users. While physical conditions along the routes in these sites   |

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| <p>do not require any special equipment. WHY do ALL these trails fall under a "special site" designation?</p>   | <p>vary and obstacles are sparse along the way on some of them, the site plan will identify needs to accommodate technical OHV use, and provide conditions suitable for such use with minimum impact on the corridor. All these sites have capability for providing technical OHV opportunities, and through the site planning related needs to enhance their quality will be identified. Because of the type of use they receive, under current BLM travel management planning guidance, this type of route is not designated as part of the transportation system, but may be identified as linear recreation site to provide for special recreational use.</p>     |
| <p>Page 12, paragraph D; I note some of the 139.3 miles of closed routes are self claiming..... why are the remaining trails being closed? Many of these depicted trails should be designated for ATV, UTV or bike routes.</p>  | <p>The reasons for the closures vary and include cultural resources, wildlife habitat, conflicts with the railroad, special management areas, and the condition of the routes.</p>  |
| <p>Due to the fact the State Land Dept. has put so many stipulations regarding access to Trust lands will BLM lands offer anything in the way of "staging areas"; or "camping or event areas". If not, how do we move forward with getting some of these areas implemented into the area plans?</p> | <p>Use of BLM lands will continue to rely on off-site accommodations for large group gatherings (camping and staging for trail rides). Small scale staging areas will be accommodated near the public land entrances.</p>   |
| <p>Page 14, paragraph 5 of the Summary Plan it states "pull off a designated route up to 100 ft on either side of the centerline". What exactly does this mean?</p>   | <p>Arizona BLM travel management policy (Outside National Landscape Conservation System units) is to allow users to pull off the side of the road up to 100 ft to park, picnic or camp as long as vegetation, soils, and improvements (fences) are not being damaged in doing so. This would allow use of all existing turnouts without specifically identifying or designating them (hand out copy of policy). However, new impacts (tracks and cleared areas) could result from this policy, but generally limited by rugged terrain in much of the area; limy flats are more vulnerable to route sprawling impacts.</p>  |
| <p>Page 15, paragraph I of the Summary Plan talks of issuance of a Record of Decision and map. Please explain and what is the timeline for all of this to take place? Are the existing trails open to our use until such time all this is final?</p>  | <p>The DR will be signed after the public review and comment period ends (May 8, 2009), after any revisions to the environmental assessment are made resulting from public review, and after any issues are resolved, including possible concerns related to the USFW Service's biological opinion on potential effects on threatened and endangered species. There has been no change in current management and use restrictions; existing roads/trails remain open to motor vehicle use subject to public land regulations protecting resources (see 43CFR8340). However, the Field Manager is not authorizing SRPs for use of routes indicated in the plan for</p> |

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|   | <p>closure. Some recently created routes technically not open to motor vehicle use are still closed; The 2003 inventory is baseline for analysis and planning, but only the routes designated under the TTMP decision will be available for motorized use. After the decision, the TTMP will establish the initial designated road/trail system and recreation sites (including special OHV sites). The plan will set the framework for follow up work related to maintenance and repair, signing, closures, restoration, further planning, surveys and studies, etc which will be carried out over the next 2 to 3 years funded through BLM budget, grants and partnerships. Map 3 will be revised to reflect the final designations for public land routes and attached to the DR. A visitor map will be produced and published for public distribution, showing the official motor route system and other information in time for the winter 2010-11 season.</p>  |
| <p>It is my understanding we can propose to BLM additional trails for future use. HOW do we do this and how long does this take?</p>  | <p>After the plan is approved, implementation of the initial system will take about 2 to 3 three years to complete. BLM will complete a desert wash study, cultural resource surveys, monitor use, patterns, user satisfaction, resource conditions and take other actions to see how effective the plan works in meeting access needs for multiple use, and public demand for recreation opportunities with the initial system. The process of revising the area land use plan (Tucson Resource Management Plan) should begin in the next 3-5 years. Revisions to the TTMP would be through the Resource Management Plan process, allocations and decisions. In the meantime, BLM efforts will focus on implementing the initial route system and gathering new information through monitoring and new studies for adaptive management. This information will be considered in the RMP revision, where recreation resource management objectives could be established for BLM lands that are beyond the scope of the proposed TTMP.</p> |
| <p>Can we propose reopening trails as the OHV numbers increase?</p>   | <p>Under the proposed TTMP, adaptive management provisions allow for 'reopening trails', or developing new trails, and proposals could be considered on a case by case basis.</p>  |
| <p>I'm assuming NEPA must be done on any "new trail proposals". Will this also include trails that are now on the inventory? Will we just be told such things as: "No money, time or personnel to do the required work for new trails?"</p> | <p>New trail proposals would be considered on case by case basis; project plan, NEPA review, and cultural surveys are typically required. Funding for those requirements will be pursued on a case by case through appropriated funds or grants or contributions. Initial implementation will focus on the OHV sites initially established, with site specific</p>   |

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|  | management plans in place before implementing new trails (even if it is trails included in the physical route inventory but not initially designated).  |
| Regarding dollars for funding NEPA, trails, etc can we, the public, write grants with BLM supporting them?   | Projects to implement the designations, maintenance and repair, restoration, signing or other needs could be done with grants, which is encouraged by BLM. As part of BLM’s efforts, grants will pursued directly or through partnerships and assistance agreements with others (noted in the proposed TTMP Section I.1). Third parties will be able to make proposals for BLM to collaborate on, support or include in its implementation efforts.   |
| It is my understanding BLM regulations state you need "reasons" for closures. Will you give us the specific reasons for the closures of: Martinez, Lower Woodpecker, Woody's Wash, Overdose and Broken Ankle?  | The closure of Martinez Canyon is primarily based on resource damage occurring in the area from motorized use. Public use along the route is causing impacts to the riparian area, damage to historic and prehistoric resources, and trespass on adjacent private land. These impacts are likely to continue and get worse if the route remains open. Lower Woodpecker contains cultural resources that are being impacted by motorized use. Overdose, Broken Ankle, and Woody’s Wash were all created illegally. Use of Overdose in particular contributes to soil erosion. Closure of these routes also stems from consideration of the OHV minimization criteria (43 CFR 8341), especially as it relates to minimizing impacts on wildlife and wildlife habitat. See also list from the “unresolved issues” in the June 2007 report by the US Institute for Environmental Conflict Resolution (ECR) on the results of the collaborative workshops to help define the proposed travel management designations |
| If Lower Woodpecker is closed do we have use of the Middle Woodpecker area as a "play area" or just a pass through to Upper Woodpecker without traveling the main road?  | The proposed plan identifies the Middle Woodpecker as an ‘OHV Site’. It is important for bypass access to the main road, and provides some ‘OHV play’ opportunities. Management of this route will be addressed in the site management plan for this OHV site, and could include preserving the OHV play opportunities there provided doing so does not cause resource damage.  |
| The road through Martinez Canyon and other roads in the area were originally built legally under Revised Statute 2477 enacted in 1866 granting right of way over public lands. The Federal Land Policy and Management Act of 1976 did not terminate valid rights-of-way existing on the date of its approval and therefore Revised Statute 2477 rights-of-way that were perfected prior to FLPMA’s enactment are “grandfathered in” and continue to be valid public easements. | R.S. 2477 granted rights of way for public use across federal land prior to 1976, when Congress repealed the law. Congress specified that any valid R.S. 2477 rights of way existing at the time of the repeal would continue in effect. Right of way assertions were to be filed by August 1996. Pinal County filed assertions on several roads in the planning area but none of them are in the planning area, nor include the Martinez Canyon route. A review of the 1922 Pinal County Road Map shows  |

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|  | <p>Price Rd., Diversion Dam Rd., Florence-Kelvin Rd., and several un-named/un-numbered roads within the planning area. A review of the 1986 Road Petitions identifies Alta Rd. (part of Cottonwood Canyon Rd.), Price Rd., Diversion Dam Rd., and Florence-Kelvin Rd. All roads identified in the 1922 and 1986 County road maps are designated as roads in the proposed TTMP.</p>   |
| <p>This entire area was riddled with mining roads dating back over 50 years or more. I feel these would still be considered legal right of ways and you cannot legally deny access.</p>  | <p>A review of the Government Land Office (GLO) survey plats for the planning area shows a number of roads existing at the time of the surveys. The GLO surveys were completed in the late 1890's and early 1900's. A review of USGS 15' topographic quadrangle covering the planning area published in 1903 also shows a road network including some roads in use presently. The Geological Survey identified a number of mining districts in the mountainous part of the planning area in the early 1900's, and mineral exploration and development activity resulted in most of the physical access routes found today. The comprehensive physical access route inventory completed for the project identified practically all the routes that were established over time; some of them continued to serve access purposes and are in use today, while others have become overgrown due to changes in access needs. Some of the abandoned routes that became overgrown are being rediscovered, and some are attracting OHV use. The BLM's comprehensive travel management planning efforts are aimed at establishing the network of roads, primitive roads and trails given the current ground conditions, land use, resource values, laws and regulations, and related factors to accommodate administrative and public use, including recreational activities related to OHV use. Some of the access routes established in the past are in sensitive areas, and their use may be restricted by the BLM.</p> |
| <p>The planning area includes BLM lands that will be transferred to Asarco once the Ray Land Exchange is concluded. The existing Battle Axe Road and the trails could be impacted by the Copper Butte, Buckeye and Pioneer Alabama mineral development projects.</p> | <p>The federal lands selected for transfer to Asarco under the Ray Land Exchange in the planning area are indicated on the maps, and discussed in the Proposed Plan/EA. Also indicated are the offered private land parcels along the Gila River near Cochran. Impacts to Battle Axe Rd are anticipated from future mining development in this area, as discussed in the Ray Land Exchange RMP Amendment/EIS. BLM will work with Asarco to provide for or protect public access on Battle Axe Road and the proposed Public Land Access route west towards Cochran. It is anticipated that public access on other routes affected by mineral</p>  |

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|  | development will be foregone as needed due to change in land ownership or safety reasons.  |
| Asarco holds unpatented mining claims in parts of T3S, R12E and T4S, R12E as well as adjacent areas. Asarco also holds dozens of valid unpatented mining claims in the Middle Gila River Area and reserves all of the rights of those claims. Asarco's concern is that proposed Plan not preclude mineral development. We urge the BLM to take into account future mineral development in the area before finalizing the routes and to be open to re-alignment should land use change. This is necessary from public safety and multiple land use considerations | Access to mining claims will be available in accordance with the mining laws. Some routes cross mining claims, and administrative access will be provided for mining related activities on closed routes if needed. The proposed designations do not affect mining activities or development. Access related to these activities will be in accordance with the mining laws. The proposed designations considered future mining in the area. Travel management plan designations, new road construction or realignment will be considered on a case by case basis. |
| Asarco requests that the BLM not show as open those routes that are on lands that will be transferred to Asarco once the Ray Land Exchange is completed.   | Access routes on lands selected for transfer to Asarco under the Ray Land Exchange are BLM lands subject to planning decisions including transportation/travel management designations. According to the RMP Amendment EIS, the Battle Axe Rd will be realigned once the land exchange is implemented, as well as re-conveyance of offered lands that would provide legal public access along Walnut Canyon. Under planned adaptive management, the designations will be amended as needed once the land exchange is implemented.                                  |