

SCOPING REPORT

Phoenix South and Sonoran Desert National Monument Resource Management Plans and Environmental Impact Statement



Prepared for
U.S. Department of the Interior
Bureau of Land Management
Phoenix Field Office

Prepared by
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**PHOENIX SOUTH AND SONORAN DESERT NATIONAL MONUMENT
RESOURCE MANAGEMENT PLANS AND
ENVIRONMENTAL IMPACT STATEMENT**

SCOPING REPORT

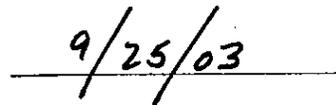
**U.S. Department of the Interior
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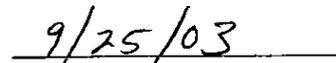


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LIST OF ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
ADEQ	Arizona Department of Environmental Quality
AGFD	Arizona Game and Fish Department
ALRIS	Arizona Land and Resource Information System
ATV	All-terrain Vehicle
AWC	Arizona Wilderness Coalition
BLM	Bureau of Land Management
EIS	Environmental Impact Statement
EPS	Economic Profile System
ESI	Ecological Site Inventory
FGDC	Federal Geographic Data Committee
FLPMA	Federal Land Policy and Management Act
GAP	Gap Analysis Program
GCDB	Geographic Coordinate Data Base
GIS	Geographic Information System
MFP	Management Framework Plan
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NRCS	Natural Resource Conservation Service
OHV	Off-highway Vehicle
ORV	Off-road Vehicle
PFO	Phoenix Field Office
R&PP	Recreation and Public Purposes
RMP	Resource Management Plan
ROS	Recreation Opportunity Spectrum
RV	Recreational Vehicle
SDNM	Sonoran Desert National Monument
SHPO	State Historic Preservation Office
TMDL	Total Maximum Daily Load
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VRM	Visual Resource Management
WSA	Wilderness Study Area

EXECUTIVE SUMMARY

The Bureau of Land Management (BLM), Phoenix Field Office (PFO), is preparing two Resource Management Plans (RMPs) and one Environmental Impact Statement (EIS) for both the Sonoran Desert National Monument (SDNM) and the Phoenix South Planning Area in Arizona. The planning area is located in the south-central portion of Arizona and includes much of Maricopa County as well as sections of Gila, Pima, Pinal, and Yuma counties. Since the current plans (the 1983 Lower Gila North Management Framework Plan, 1988 Lower Gila South RMP, and 1989 Phoenix Resource Area RMP) were developed, numerous changes have occurred in the area that require reconsideration of certain decisions.

The first in a series of nine basic steps employed in BLM's planning process is the identification of issues. These issues were identified through scoping, a process which is conducted early in the planning effort and open to agencies and the public. The scoping process commenced with the publication of the *Federal Register* notices on April 24, 2002 for SDNM and December 9, 2002 for the Phoenix South Planning Area. BLM's intent during the scoping process was to inform agencies and the public about the Phoenix South and SDNM RMPs/EIS and solicit their comments in order to identify issues and questions to consider when developing the RMP and environmental analysis for the Phoenix South and SDNM RMPs/EIS.

The results of scoping are summarized in this report. In addition, this report provides background information about the RMPs/EIS purpose and need, planning area, and BLM's collaborative planning process; describes the scoping processes, including the techniques that were used to notify the public about their opportunity to be involved in scoping and a brief summary of the public scoping meetings; presents the planning criteria developed to guide and direct the plan; identifies existing data available for the studies and analyses and data needs; and provides a brief summary of future steps in the RMP/EIS process.

In addition to the announcement in the *Federal Register*, the BLM announced the commencement of the RMPs/EIS and schedule for the scoping meetings and invited written comments through various means including a planning bulletin, legal notice, newspaper advertisements, the Arizona BLM web site, and media releases. The BLM held 11 public scoping meetings during February and March of 2003 in the Arizona communities of Maricopa, Gila Bend, Casa Grande, Globe-Miami, Ajo, Sells, Tucson, Buckeye, Mesa, Phoenix, and Yuma. A total of 367 people registered their attendance at the scoping meetings,

Comment worksheets for each planning area were provided by BLM at the scoping meetings, included in the first planning bulletin, and available at BLM's web site. The comment worksheets inquired about (1) the public's values regarding the land, (2) the types of activities important to them, and (3) their preferred management style for the resources in the area. In addition, BLM invited participants to submit comments in formats other than the comment worksheets, including letters and electronic mail (e-mail) messages. BLM also noted comments made during agency and Tribal coordination meetings as well as other meetings with the public.

While BLM will continue to consider public comments throughout the RMPs/EIS process, BLM requested that comments to identify planning issues be submitted by March 30, 2003. During the scoping phase of the project, more than 6,000 letters, comment worksheets, and e-mail messages were received and evaluated for this Scoping Report. The comments were compiled, reviewed, and analyzed to identify the preliminary issues that will be addressed in the RMPs/EIS.

About 3 percent, or 166 of the comment letters, were submitted on the BLM comment worksheets. With regard to public values and activities, many comments pertained to both the Phoenix South Planning Area and SDNM; when a planning area was specified, another individual often identified the same value or activity for the other planning area. Most of the comments submitted on the BLM comment worksheets came from persons with an Arizona mailing address. Together with individualized comment letters and e-mails, about 500 individuals submitted unique comments. These included a few comment letters from Federal, State, or local agencies; some commercial businesses, including developers and utility companies; and approximately 25 special interest groups.

In addition to the unique individualized comments, three form letters were submitted by a number of individuals, primarily through the use of e-mail. The first of these form letters, submitted by approximately 60 individuals, requests that BLM protect Saddle Mountain, which is located within the Phoenix South Planning Area, by initiating a wilderness study for the area. A second form letter, submitted by approximately 70 individuals, urges BLM to support and protect all five of the new Arizona national monuments and notes the public support for these monuments. The final form letter, submitted by approximately 5,400 individuals (and thus accounting for about 90 percent of the total comment letters received), was created and distributed through the cooperative efforts of the Sierra Club and the Arizona Wilderness Coalition. Among other things, this letter asks BLM to adopt a specifically recommended transportation plan for SDNM and to designate 140,506 acres as wilderness study areas within SDNM and 250,000 acres of wilderness study areas within the Phoenix South Planning Area.

The comment letters were entered into an electronic database so that comments would be sorted in several ways including type of issue; geographic location; type of submitter (agency, special interest group, individual, etc.); and whether the comments pertained to the Phoenix South Planning Area, SDNM, or both. Persons residing in California submitted the most comment letters, accounting for about 19 percent of all comment letters. Persons in Arizona submitted about 10 percent of the comment letters, with the vast majority of these letters containing unique and individual comments. Because many of the letters include comments on several different issues, more than 3,600 individual comments were identified, although many of these comments were similar in nature so it is estimated that there were about 2,000 unique comments.

The comments were analyzed further and issues were identified by major resource category for each area. The following 18 resource categories were defined:

- Soil, water, and air resources
- Biological resources
- Grazing management
- Wild horses and burros
- Fire management
- Mineral and energy resources
- Lands and realty
- Recreation
- Special Area Designations
- Visual resources
- Transportation and access
- Airspace
- Law enforcement
- Socioeconomics
- Public participation and education
- Cultural resources
- Native American issues
- Public health and safety

For some of these resource categories, specific resource topics were defined within the category (e.g., special status species is a topic within biological resources). Within each resource topic, issues were identified as those (1) issues to be used in the development and analysis of EIS alternatives, (2) issues that will not be addressed (including rationale), and (3) issues that can be addressed administratively. Resource-specific planning criteria and management concerns also are presented for each.

More than 95 percent of all categorized comments regarded the following six of the 18 resource categories (in descending order): wilderness and special management areas, lands and realty, transportation and access; livestock grazing; recreation; and biological resources. More than 80 percent of all comments from Arizona residents regarded the same six resource categories, but in slightly different proportions as follows (in descending order): wilderness and special management areas, recreation; lands and realty, transportation and access; livestock grazing; and biological resources.

These comments and issues identified through scoping and subsequent discussions will assist in determining the scope of the studies to be completed and addressed in the RMPs/EIS. BLM will continue to collaborate with relevant agencies and interested publics, and consider public comments throughout the RMPs/EIS process. The planning criteria presented in this Scoping Report, a key element of the second step in the BLM planning process, will be distributed to the public for review in Fall 2003. Various agencies will be contacted during the data and information collection phase, which has recently been initiated and is the third step in the planning process. The remaining steps include the analysis of the management situation, formulation of alternatives, estimation of effects of the alternatives, selection of the preferred alternative(s), selection of the plan, and monitoring and evaluation.

SECTION 1.0 INTRODUCTION

1.1 OVERVIEW

The Bureau of Land Management (BLM), Phoenix Field Office (PFO), is preparing Resource Management Plans (RMPs) for both the Sonoran Desert National Monument (SDNM) and the Phoenix South Planning Area in Arizona. The SDNM, consisting of 486,603 acres of BLM administered public lands within the Phoenix South Planning Area, was established on January 17, 2001, with the signing of Presidential Proclamation 7397 (see Appendix A). The Phoenix South Planning Area includes approximately 932,000 acres of BLM administered land in south-central Arizona with the largest tracts in the Gila Bend Mountains, Sentinel Plain, and Ajo area (Map 1).

An Environmental Impact Statement (EIS) is being prepared to identify the potential effects of implementing the alternative management approaches for these RMPs and to identify appropriate measures to mitigate potential impacts. The EIS will be prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, Council on Environmental Quality regulations implementing NEPA, the Federal Land Policy and Management Act of 1976 (FLPMA), and other associated regulations. Together, the RMPs and EIS will analyze and update BLM's management practices for these lands in response to new legislation, changing policies, and the changing uses of public land and its resources.

1.1.1 BACKGROUND

The BLM PFO completed the Lower Gila North Management Framework Plan (MFP) in 1983, the Lower Gila South RMP in 1988, and the Phoenix Resource Area RMP in 1989. The purpose of these documents was to provide a comprehensive framework for managing the public land and for allocating resources over a planning period of 15 to 20 years. These documents set forth land use decisions and terms and conditions for guiding the management of activities on public land.

1.1.2 PURPOSE AND NEED

Since the current plans were developed, numerous changes have occurred in the area that requires reconsideration of certain decisions. The changes include continued urban growth in the Phoenix metropolitan area and surrounding communities, increased recreational use of BLM administered public lands, and the designation of the SDNM.

Time and experience have demonstrated that many elements of the current Lower Gila North MFP, Lower Gila South RMP, and the Phoenix Resource Area RMP work well, and it is BLM's intent to carry these elements forward. Much of the success is attributed to ongoing collaborative efforts with other Federal, State, county, and local agencies; tribes; organizations; and individuals.

However, BLM has determined that some of the existing management decisions in these plans have not kept pace with changing circumstances, demographics, resource conditions, and/or policies. While there will be consistency in the planning philosophy for both RMPs, each plan will have unique goals and management direction that is suitable to each planning area.

There are many factors to consider in creating and developing these plans. For example, population growth in the region has increased recreational uses of public land. The Presidential Proclamation establishing the national monument assigns BLM with the responsibility to protect the special qualities for which the monument was designated, but there is still a need to allow public access within the monument. Factors such as these emphasize the need to replace the existing RMPs with plans that address the current issues.

BLM is responsible for balanced management of public lands and resources considered in a combination that will serve the needs of the public most effectively. In accordance with FLPMA, management is based on the principles of multiple use and sustained yield; this integration of uses takes into account the long-term needs of present and future generations for renewable and nonrenewable resources. For the SDNM, this planning process also must take into consideration the Presidential Proclamation, which defines for SDNM “objects of scientific and historic interest” that must be protected and lists actions needed to protect SDNM resources. It also reserves all federal lands within the boundaries and withdraws all lands in SDNM from disposal under public land laws and continues many current uses and authorities. BLM is developing the RMPs/EIS to be consistent with current laws and regulations, and is providing the public an opportunity to be involved in the development of the RMPs and the planning process for public lands in the Phoenix South Planning Area and SDNM.

Integral to the planning and environmental process is the public participation program, which keeps relevant agencies and the interested public engaged in the project’s progress. Opportunities for public participation include scoping, public meetings and workshops, focus group discussions, updated mailings, interaction through e-Planning, and hearings that will occur at key milestones throughout the process.

1.2 PLANNING AREA

1.2.1 LOCATION

The planning area is located in the south-central portion of Arizona and includes much of Maricopa County as well as sections of Gila, Pima, Pinal, and Yuma counties (see Map 1). The study area covers more than 8.8 million acres, of which approximately 1.42 million surface acres and 1.7 million subsurface acres are public lands administered by the BLM. Two RMPs will be prepared to address the special management provisions associated with the SDNM separately from the other BLM administered public lands within the planning area. The SDNM RMP will address approximately 486,600 surface acres and 460,800 subsurface acres of BLM administered public land and the Phoenix South RMP will address approximately 932,000 surface acres and 1.24 million subsurface acres.

While the majority of the BLM administered public lands are consolidated, some small tracts are interspersed with other Federal, State, and private lands. Other federal land managers include the Air Force, National Park Service, U.S. Fish and Wildlife Service (USFWS), and U.S. Forest Service (USFS). Some of the large land owners and managers include Arizona State Land Department for State trust lands; county parks; and various tribes including the Tohono O’odham Nation, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and Ak Chin Indian Community. In addition, other agencies may have management responsibilities, such as the Arizona Game and Fish Department (AGFD)’s responsibility for managing wildlife for the state.

1.2.2 DESCRIPTION

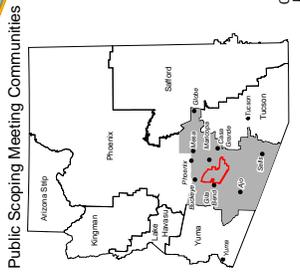
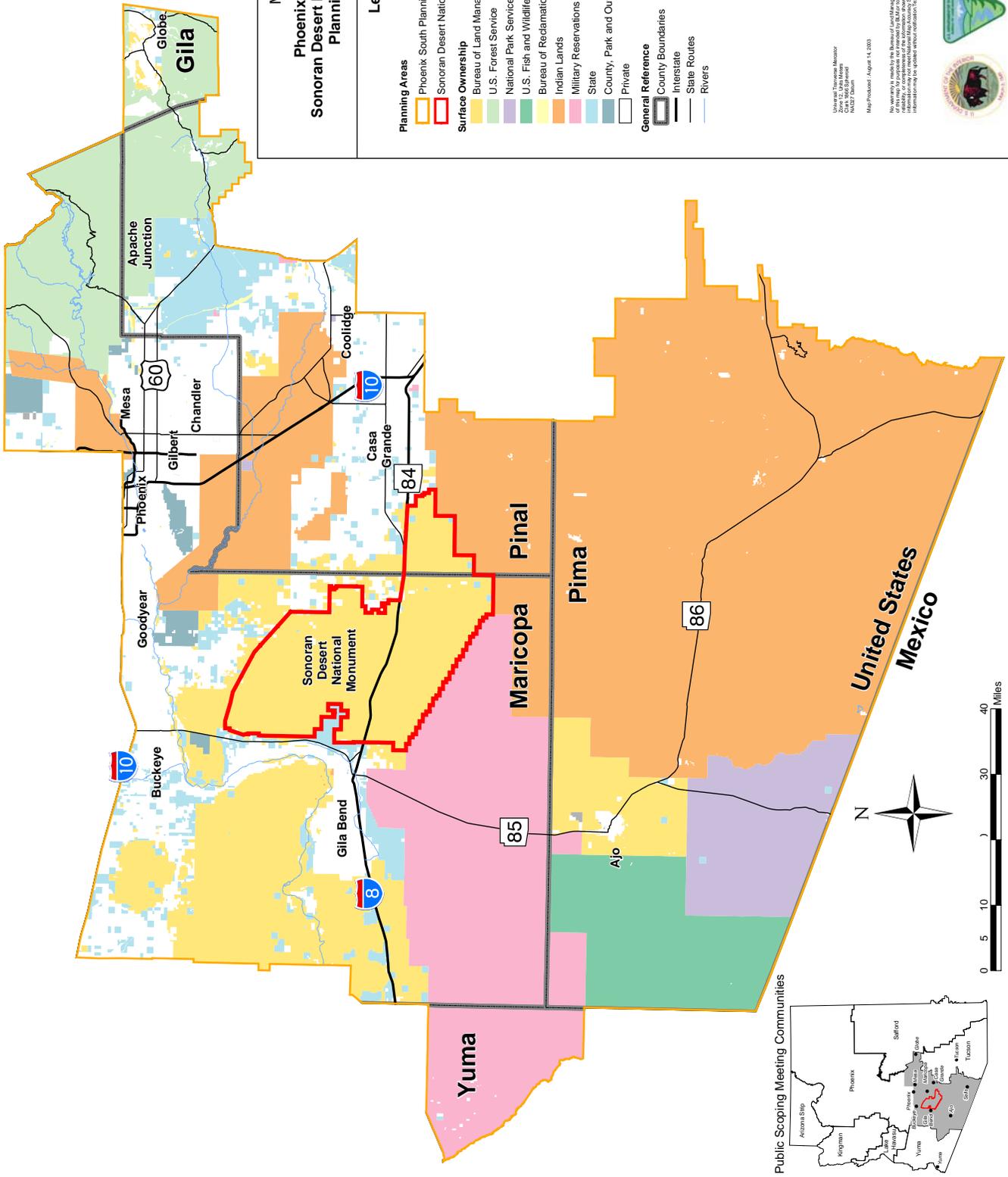
The plan area includes a diverse array of resources that the BLM is tasked to manage. The public lands include large tracts within the Sonoran Desert that are valued for their beauty, primitive characteristics, and wildlife habitat. Such resources make the lands popular for recreation, particularly because of their

Map 1
Phoenix South and Sonoran Desert National Monument Planning Areas

- Legend**
- Planning Areas**
- Phoenix South Planning Area
 - Sonoran Desert National Monument Planning Area
- Surface Ownership**
- Bureau of Land Management
 - U.S. Forest Service
 - National Park Service
 - U.S. Fish and Wildlife Service National Wildlife Refuge
 - Bureau of Reclamation
 - Indian Lands
 - Military Reservations
 - State
 - County, Park and Outdoor Recreation Areas
 - Private
- General Reference**
- County Boundaries
 - Interstate
 - State Routes
 - Rivers

Approved by the Phoenix Metropolitan Council of Governments (PMCOG) for the Phoenix South Planning Area. This map is for informational purposes only and does not constitute a contract. Information on this map is not warranted, accurate, or complete. This information is for general reference only.

Map Produced August 14, 2003

proximity to the Phoenix and Tucson metropolitan areas. Transportation and utility corridors on the public lands support the infrastructure of urban communities throughout the area. The historic and current mining claims speak to the value of the mineral resources. The area also has a long history of providing land for ranching and grazing. In addition to these examples of current and recent historical use, the lands are rich with prehistoric sites and artifacts from ancient times as well as the history from early explorers.

In particular, the SDNM is an excellent example of a large landscape within the Sonoran Desert, one of the most biologically diverse deserts in North America. The monument consists of three distinct mountain ranges separated by wide valleys, and includes large saguaro cactus forest communities that provide an excellent habitat for a wide range of wildlife species. The monument also contains three designated wilderness areas, many significant cultural and historic sites, and the remnants of several important historic trails. Recreation and grazing are the primary uses of the monument.

Population centers include the Phoenix metropolitan area, Goodyear, Buckeye, Gila Bend, Ajo, and Globe-Miami. Smaller communities include Tonopah, Mobile, and Maricopa.

1.3 COLLABORATIVE PLANNING

Collaboration may be used to describe a wide range of external and internal working relationships. According to BLM Handbook H-1601-1, Appendix B, collaboration implies that other Federal agencies; Tribal, State and local governments; and various members of the public will be involved in the project well before the planning process is officially initiated, rather than at specific points mandated by regulation and policy (BLM 2002).

Agency coordination is an important step in a successful collaborative process for several reasons. First, early involvement with other Federal, Tribal, State, and local governments establishes a solid working relationship with each agency. Next, it builds trust and credibility between agencies that can then be transferred to the public. Finally, it will help ensure BLM develops land use decisions that are supported by and conform to other jurisdictions in any given area to the maximum extent possible. Similarly, active involvement by the public early in the process helps to ensure alternatives are considered that address the diversity of public interests, builds trust between BLM and the public, creates public “buy-in” to and understanding of the eventual management decisions, and develops a working relationship that will carry into the shared implementation of those management decisions.

1.3.1 COOPERATING AGENCIES

As a part of initiating the planning efforts throughout the state, BLM compiled a list of Federal, State, county, and local agencies and American Indian Tribes that may have a relevant interest in the planning process. A letter introducing the RMPs/EIS, identifying the upcoming data gathering efforts, and offering them the opportunity to become cooperating agencies in the planning efforts was sent to more than 200 agencies. A cooperating agency meeting was held at the Arizona State Office on October 30, 2002. The purpose of the meeting was to discuss BLM’s planning process, collaborative planning, and the meaning and responsibilities of cooperating agency status. Opportunities for involvement in BLM’s planning process without becoming a cooperating agency also were discussed. It was made clear that BLM’s goal was to encourage involvement by all interested parties using whatever methods the parties wished. A draft Memorandum of Understanding was provided to the potential cooperators for consideration. Several agencies who attended expressed interest in being involved in the planning process for the SDNM and Phoenix South areas, including the AGFD, Tohono O’odham Nation, U.S. Air Force, U.S. Marine Corps, Border Patrol, City of Casa Grande, Tonto National Forest, Maricopa County, Pinal County, USFWS, City of Gilbert, Arizona State Land Department, Arizona Department of Transportation, and the Ak-Chin

Indian Community. Other types of agreements also have been established, including a Memorandum of Understanding between USFWS and BLM regarding Endangered Species Act Section 7 consultation. A Memorandum of Understanding is being developed for those agencies choosing to be a cooperating agency on the Phoenix South and SDNM RMPs/EIS to outline the roles and responsibilities of the cooperating agencies and the BLM throughout the planning process. While no cooperating agency agreements have been established to date, the following agencies have expressed interest in participating in the preparation of the RMPs/EIS as cooperating agencies:

- Arizona Game and Fish Department
- Tohono O’odham Nation
- U.S. Air Force, Luke Air Force Base
- U.S. Marine Corps, Headquarters
- U.S. Department on Homeland Security, Border Patrol

1.3.2 AGENCY COORDINATION

BLM has contacted key Federal, State, and county agencies to initiate coordination and collaborative efforts that will continue throughout the planning and EIS process. At this early stage, initial information letters were sent with the goal of introducing the RMP/EIS process; gathering preliminary issues, ideas, and concerns; and discussing the role of agencies in the process. As of the date of this report, contact has been made with the following agencies:

Federal

- Bureau of Indian Affairs, Phoenix Area Office
- Bureau of Reclamation, Arizona, field office
- Environmental Protection Agency
- Federal Highway Administration
- National Park Service, Organ Pipe Cactus National Monument & Juan Bautista de Anza National Historic Trail
- National Resource Conservation Service
- Southwest Strategy Coordination Office
- U.S. Department of Agriculture, Rural Development, Arizona
- U.S. Department of Defense (Air Force, Marine Corps, Army Corps of Engineers plus National Guard)
- U.S. Department on Homeland Security, Border Patrol, Tucson office
- USFWS, Cabeza Prieta National Wildlife Refuge
- USFWS, Ecological Services
- U.S. Forest Service, Tonto National Forest
- U.S. Geological Survey

State

- Arizona Corporation Commission
- Arizona Department of Commerce
- Arizona Department of Emergency Management

- Arizona Department of Environmental Quality
- Arizona Department of Transportation
- Arizona Department of Water Resources
- Arizona Game and Fish Department
- Arizona Governor's Office
- Arizona Mines and Mineral Resources
- Arizona Office of Tourism
- Arizona Office of the Attorney General
- Arizona State Land Department
- Arizona State Mine Inspector
- Arizona State Parks
- State Historic Preservation Office

County

- Central Arizona Association of Governments
- Gila County
- Maricopa Association of Governments
- Maricopa County
- Pima County
- Pinal County
- Yuma County

Local

- City of Apache Junction
- City of Casa Grande
- City of Chandler
- City of Gilbert
- City of Glendale
- City of Phoenix
- Town of Buckeye
- Town of Gila Bend
- Town of Goodyear
- Town of Queen Creek

An initial agency scoping meeting was held with the government agencies and tribes on June 5, 2003 to share information on the planning activity and to solicit comments. A short presentation on the planning process and the planning area was provided, followed by informal questions and answers. Agencies were requested to provide scoping comments to the BLM by June 30, 2003. Coordination meetings with these and additional agencies will continue throughout the planning process.

1.3.3 TRIBAL CONSULTATION

As previously described, the Phoenix South Planning Area consists of multiple governmental organizations with land management responsibilities, including Tribal lands for the Tohono O'odham Nation, Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and Fort McDowell Yavapai Nation. As part of the scoping effort, BLM contacted the following tribes by letter on July 25, 2002 to initiate consultations and to reiterate the opportunity to be a cooperating agency in the planning process.

- Ak-Chin Indian Community
- Fort McDowell Yavapai Nation
- Fort Sill Apache Tribe
- Gila River Indian Community
- Hopi Tribe
- Pascua Yaqui Tribe
- Salt River Pima-Maricopa Indian Community
- San Carlos Apache Tribe
- Tohono O'odham Nation
- Tonto Apache Tribe
- White Mountain Apache Tribe
- Yavapai-Apache Indian Community
- Yavapai-Prescott Indian Tribe

On June 28, 2002, a meeting was held at the Ak-Chin tribal headquarters with the Cultural Resources Committee of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation). The planning process and planning areas were described, and formal consultation, cooperating agency status, and community involvement and collaboration were discussed. Tribal staff emphasized the importance of ongoing and regular consultation, protection of cultural and natural resources, and the need for law enforcement to protect cultural sites from damage and looting.

On August 21, 2002, PFO staff met with the Hopi Cultural Preservation Office staff at the Hopi Tribal Government Complex. The primary interest of the staff was the Agua Fria National Monument, but the staff did reiterate the need for continuing consultations for all public lands in Arizona. Hopi staff emphasized the importance of protecting cultural sites, and restricting uses that may adversely affect those sites. Other concerns included the BLM reburial policy and scientific testing and data recovery.

On September 17, 2002, PFO staff met with Tohono O'odham Nation cultural and natural resources staff, legislative council members, and representatives of the Tribal Chairman. BLM provided a short presentation on the planning process and planning areas, and formal consultation, cooperating agency status, and community involvement and collaboration were discussed. The Nation staff was interested in natural and cultural resource protection, grazing management, law enforcement, both with regard to cultural resource site protection and undocumented immigrants and drug smuggling, and opportunities for co-management of the SDNM. The Nation is interested in acquiring two parcels of land: Darby Wells near Ajo (the effort to make this land available is currently underway) and the Florence Cemetery. The Nation is also interested in becoming a cooperating agency. On October 18, 2002, a follow-up meeting

was held with the Legislative Resource Committee of the Tribal Council to provide information on the planning process and further discuss issues of interest to the Nation.

On September 18, 2002, PFO staff met with the Ak-Chin Indian Community Tribal Council. BLM provided a short presentation on the planning process and planning areas; formal consultation, cooperating agency status, and community involvement and collaboration were discussed. The Ak-Chin expressed interest in cultural resource protection, particularly on the SDNM, and requested that BLM keep the Ak-Chin cultural staff informed on progress in the planning process.

On March 28, 2003, a field trip was held with representatives from the Four Southern Tribes on the SDNM. The trip included stops at a petroglyph site, historic Papago site, archaic site, and the Vekol Grasslands Area of Critical Environmental Concern (ACEC). In addition to discussion of each site and appropriate protection measures, BLM's categorization process for cultural sites and the ongoing Class I Cultural inventory were discussed.

In addition to formal consultation and opportunities to become cooperating agencies, the tribes were invited to attend the agency scoping meeting held on June 5, 2003 (see Section 1.3.2 for more information). Formal consultation with the tribes, as well as coordination meetings, will continue throughout the planning process.

1.3.4 PUBLIC INTERACTION

Public involvement is critical to the success of the planning process. BLM has performed a variety of public outreach programs to increase involvement in the planning process. These efforts have included presentations to community councils, business and social groups, and various organizations as well as public meetings. This public outreach has helped to raise awareness of and involvement in the planning process. BLM now has several thousand individuals on its mailing list and the list is continuing to grow. BLM has taken a two-pronged approach to public involvement. The first is the traditional public involvement through scheduled and announced public meetings. This began with public scoping meetings and will continue at appropriate planning stages throughout the planning process. The second is informal public interaction through BLM attendance at community and organization meetings. BLM conducted 11 public scoping meetings during February and March of 2003. The open house scoping meetings were held in the Arizona communities of Maricopa, Gila Bend, Casa Grande, Globe-Miami, Ajo, Sells, Tucson, Buckeye, Mesa, Phoenix, and Yuma. These meetings are discussed in more detail in Section 1.4.

Additional public interaction has occurred through BLM participation at community meetings, special interest group meetings, and coordination with elected representatives. BLM staff has been invited to speak at meetings in the communities of Tonopah, Buckeye, Gila Bend, Ajo, and Mobile as well as at numerous environmental and recreation groups. These informal meetings have provided the opportunity to explain the BLM planning process and timeline and to encourage citizen participation in the planning efforts. These meetings have been very helpful for both the planning effort and to identify issues that need immediate action, independent of the planning process. Several communities also have met independently to discuss the public lands and develop recommendations to present to BLM. BLM will continue to actively encourage public involvement through the formal planning process, informal community meetings, and other methods.

1.4 SCOPING PROCESS

This section describes the scoping processes, identifies the techniques that were used to notify the public about their opportunity to be involved in scoping, and gives a brief summary of the public scoping meetings.

1.4.1 DESCRIPTION OF PROCESS

Scoping is a process conducted early in a planning process that is open to agencies and the public to identify the range, or scope, of issues to be addressed during the planning and environmental analysis for the Phoenix South and SDNM RMPs/EIS. The lead agency responsible for the preparation of the document (in this case, BLM) solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then identifies the issues that will be addressed during the planning and environmental analysis; that is, the scope of analysis for the RMPs/EIS. The scoping period began with the publication of the *Federal Register* notices. The duration of the scoping process is at least 30 days, but BLM is encouraging public involvement throughout the planning process. For the purposes of identifying planning issues, BLM requested that comments be received by March 30, 2003; however, comments will be considered whenever they are received. The remainder of this scoping report provides an explanation of the scoping activities and a summary of the comments received.

BLM's intent during the scoping process is to inform agencies and the public about the Phoenix South and SDNM RMPs/EIS and solicit their comments in order to identify issues and questions to consider when developing the plan. During the scoping period, BLM announced the commencement of the RMPs/EIS through various means, invited written comments, and held public scoping meetings. These activities are described below.

1.4.2 ANNOUNCEMENTS

The RMPs/EIS and scoping meetings were announced through the *Federal Register*, a planning bulletin, legal notice, newspaper advertisements, the Arizona BLM Web site, and media releases.

1.4.2.1 Federal Register

The Phoenix South and SDNM RMPs/EIS and public scoping process began officially with the publication in the *Federal Register* of BLM's Notice of Intent to amend the RMP, prepare an EIS, and conduct public scoping meetings. The Notice of Intent to initiate planning on the SDNM was published on April 24, 2002 (Vol. 67, No. 79, Page 20158, [AZ-400-02-1610-DO-089A]) and the Notice of Intent to initiate planning on the Phoenix South planning area was published on December 9, 2002 (Vol. 67, No. 236, Page 72968, [AZ-020-03-1610-DO-089A]).

1.4.2.2 Planning Bulletin

In addition to the Notice of Intent, BLM prepared a planning bulletin to send to the entities on BLM's mailing list, which includes Federal, State, county, and local agencies; Tribes; organizations and special-interest groups; and other interested parties. The planning bulletin provided a brief history and background information of the project, why management plans are needed, a description of the process, the project schedule, and how to get and stay involved in the process. The planning bulletin was available in both Spanish and English.

The planning bulletin also announced the upcoming public scoping meetings and other public participation opportunities. A comment worksheet included with the planning bulletin asked readers to

submit comments related to the RMPs/EIS and indicate whether or not they were interested in receiving future project information. The planning bulletin was distributed to more than 1,300 individuals, agencies, and interested organizations in January 2003, and was also available on the BLM web site. Bulletins were also left at common gathering places, including chambers of commerce, libraries, and sports and book stores throughout the planning area.

The planning bulletin was the first in a series of informational planning bulletins that will be distributed to the entities on the mailing list at key points of the process to keep them informed of progress. The mailing list will be updated throughout the RMP/EIS process to include additional persons who are interested in the planning process.

1.4.2.3 Legal Notices

Legal notices appeared a minimum of 15 days in advance of the date a public meeting was conducted in each geographic area. The legal notices announcing the public scoping meetings were published in the following newspapers:

- *The Arizona Republic* (statewide edition)
- *Arizona Daily Star/Tucson Citizen* (Tucson metropolitan area)
- *Arizona Daily Sun* (Flagstaff metropolitan area)
- *Prensa Hispana* (Spanish newspaper in Phoenix metropolitan area)

1.4.2.4 Media Releases and Public Service Announcements

BLM prepared a media release and public service announcement in both English and Spanish to introduce the project and announce the scoping meetings. These were issued January 21-31, 2003 to local and regional newspapers, television, and radio as follows.

Newspapers

- *The Arizona Republic* (Phoenix)
- *Arizona Daily Star/Tucson Citizen* (Tucson)
- *West Valley View* (Goodyear, Litchfield Park, Avondale, Buckeye, Tolleson)
- *Buckeye Valley News* (Buckeye)
- *Desert Sun* (West Valley, Buckeye)
- *Tribune Newspapers* (Mesa, Prescott Valley, Scottsdale)
- *Arizona Daily Sun* (Flagstaff)
- *Prensa Hispana* (Phoenix)
- *Ak Chin Runner* (Ak-Chin Indian Community)
- *The Runner* (Tohono O'odham Nation)
- *Daily Sun* (Yuma)
- *La Voz* (Phoenix)
- *Gila Bend Sun* (Gila Bend)
- *Arizona Silverbelt* (Globe-Miami)
- *Copper Country News* (Globe-Miami)
- *Ajo Copper News* (Ajo)

- *New Times* (Phoenix)
- *Apache Junction Independent* (Apache Junction)
- *Daily News Sun* (Sun City)
- *Ocotillo News* (Chandler)
- *Sun City Independent* (Sun City)
- *Gilbert News* (Gilbert)
- *Tri-Valley Central* (Casa Grande area, includes *Casa Grande Dispatch*, *Coolidge Examiner*, *Tri-Valley Dispatch*, *Arizona City Independent*, *Eloy Enterprise*, *Florence Reminder*, and *Blade Tribune*)

Television Stations

Phoenix:

- KUTP
- KTVK
- KAET
- KNXV
- KPHO
- KPNX

Tucson:

- KOLD
- KVOA
- KGUN
- KMSB
- KUAT

Radio Stations

- KHRR
- KEDG
- KZON
- KFMA
- KASA
- KKLT
- KDKB
- KTAR
- KZPT
- Skyview Radio Network

Web Site

A web page was established to provide project information in mid-August 2002 (linked from an existing web site at www.az.blm.gov). The planning bulletin was posted on the web site in mid-January 2003.

1.4.3 PUBLIC MEETINGS

BLM hosted 11 public scoping meetings during February and March of 2003 that were attended by 367 persons, as shown in Table 1-1.

Table 1-1. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Date	Meeting Location	Number in Attendance
Monday, February 10, 2003	Maricopa, Arizona	24
Tuesday, February 11, 2003	Gila Bend, Arizona	29
Wednesday, February 12, 2003	Casa Grande, Arizona	20
Thursday, February 13, 2003	Globe, Arizona	7
Tuesday, February 18, 2003	Ajo, Arizona	44
Wednesday, February 19, 2003	Sells, Arizona	18
Thursday, February 20, 2003	Tucson, Arizona	42
Monday, February 24, 2003	Buckeye, Arizona	50
Tuesday, February 25, 2003	Mesa, Arizona	28
Thursday, February 27, 2003	Phoenix, Arizona	53
Thursday, March 6, 2003	Yuma, Arizona	52

Each of the 11 meetings was conducted in an open house format, allowing meeting participants to review maps and display boards of each planning area and ask specific questions one-on-one to BLM staff about the RMPs/EIS process.

Planning bulletins, comment worksheets for each planning area, and fact sheets regarding the various resources within each planning area were available for the public as handouts at each scoping meeting. The information presented on the text display boards also was available on the fact sheet handouts. There were additional fact sheet handouts that presented materials that were not presented on the text display boards. The handouts were available in both English and Spanish, but the display boards were only in English.

Two separate comment worksheets were circulated at each of the public meetings with one for the SDNM and the other for the Phoenix South Planning Area. The comment worksheets provided by BLM inquired about the public's values regarding the land, the type of activities important to them, and their preferred management style for the resources in the area. BLM invited participants to submit comments in formats other than the comment worksheets, including letters and e-mail messages.

SECTION 2.0 PLANNING CRITERIA

2.1 INTRODUCTION

The planning criteria guide and direct the plan, and determine how the planning team approaches the development of alternatives and ultimately the selection of a preferred alternative. They ensure that plans are tailored to the identified issues and ensure that unnecessary data collection and analyses are avoided. Planning criteria focus on the decisions to be made in the plan and achieve the following:

- Provide an early basis for inventory and data collection needs
- Enable the manager and staff to develop a preliminary planning base map delineating geographic analysis units
- Stimulate the revision of existing and development of additional planning criteria during public participation
- Provide sideboards for the decisions and alternatives that will be considered in the plan, taking into account law, regulations, and policy

2.2 RESOURCES TO BE ADDRESSED

The resource categories for which public scoping comments were received include the following:

- Soil, water, and air
- Biological resources
- Grazing management
- Wild horses and burros
- Fire management
- Mining, minerals, and energy
- Lands and realty
- Recreation
- Special management areas
- Visual resources
- Transportation
- Airspace
- Law enforcement
- Socioeconomics
- Public participation and education
- Cultural resources
- Native American issues
- Public health and safety

2.3 GENERAL PLANNING CRITERIA

2.3.1 CRITERIA APPLICABLE TO BOTH PLANNING AREAS

- The planning process will include an EIS that will comply with NEPA standards. Two Records of Decision will be issued—one for the SDNM and one for the Phoenix South area.
- The plans will be completed in compliance with the FLPMA, Endangered Species Act, NEPA, the Archaeological Resources Protection Act, and all other relevant federal laws and executive orders, as well as the management policies of the BLM.
- Where planning decisions have previously been made that still apply, those decisions will be carried forward into the RMPs. They also will use information developed and management alternatives proposed in previous studies of the planning area, including the proposed Amendment and Environmental Assessment to the Lower Gila North Management Framework Plan and the Lower Gila South RMP (2000).
- Planning decisions will be made in the context of the best-available data, including information specific to the BLM managed lands and regional contextual information. Regional contextual data may be used to identify the regional importance of the public lands for resource use and protection.
- The planning team will work collaboratively with the State of Arizona; Maricopa, Pinal, Pima, Gila, and Yuma counties; tribal governments; municipal governments; other federal agencies; the Resource Advisory Council; and all other interested groups, agencies, and individuals. Decisions in the plan will strive to be compatible with existing plans and policies of adjacent local, State, Tribal, and Federal agencies, consistent with Federal law and regulations. Opportunities to coordinate management with adjoining landowners for resource protection and public uses will be considered.
- The RMPs will be developed in such a way that it will be flexible and adaptable to new and emerging issues and opportunities. During implementation of the RMPs, the BLM will continue to work in partnership with the public and local, State, and Tribal governments and agencies to identify priority implementation projects and to identify and resolve emerging issues.
- Native American Tribal consultations will be conducted in accordance with policy, and tribal concerns will be given due consideration. The planning process will include the consideration of any impacts on Indian trust assets.
- Consultation with the USFWS will take place throughout the planning process in accordance with Section 7 of the Endangered Species Act and the National Memorandum of Agreement (August 30, 2000) to identify conservation actions and measures for inclusion in the plan.
- Coordination with the Arizona State Historic Preservation Office will be conducted throughout the planning process.
- The plans will recognize the State's authority to manage wildlife populations, including hunting and fishing, within the planning area. Coordination with AGFD will occur in accordance with the statewide Memorandum of Understanding (March 1987).

- The plans will set forth a framework for managing recreational and commercial activities in order to maintain existing natural landscapes and to provide for the enjoyment and safety of the visiting public.
- The lifestyles of area residents, including the wide variety of uses of the public lands, will be considered in the RMPs.
- Any lands, or interests therein, located within the planning area boundary, which are acquired by BLM, will be managed consistently with these RMPs, subject to any constraints associated with the acquisition.
- The RMPs will address transportation and access for the public lands; areas will be identified as open to vehicles, closed to vehicles, or vehicles limited to designated roads. Within the monument and in other areas identified in the RMPs, motorized and mechanized routes will be designated.
- The RMPs will recognize valid existing rights.
- Federal Geographic Data Committee standards and other applicable BLM standards will be followed in the development and management of data.
- Management of existing wilderness will continue. The RMPs will not address reduction or elimination of existing wilderness, changes in boundaries of existing wilderness, or opening of roads or mechanized or motorized access into existing wilderness.

2.3.2 CRITERIA APPLICABLE TO PHOENIX SOUTH PLANNING AREA

- The Phoenix South RMP will establish management guidance for the public lands outside of SDNM. The Phoenix South RMP will replace and supercede all other BLM resource management plans for the lands covered by the Phoenix South RMP.

2.3.3 CRITERIA APPLICABLE TO SDNM PLANNING AREA

- The SDNM RMP will establish the guidance upon which the BLM will manage the SDNM, and will replace and supercede all other BLM resource management plans for the lands covered by the SDNM RMP.
- The SDNM RMP will meet the requirements of the SDNM Proclamation of January 17, 2001 (#7397), to protect the objects of geological, archaeological, historical, and biological value within the monument.
- In accordance with the Proclamation, acquired lands and interests within the monument boundary will be added to the monument, and will be managed consistently with the SDNM RMP.
- Due to the desire to maintain the existing natural and cultural landscapes of the SDNM, to the maximum extent possible, facilities will be located outside the monument boundary or in neighboring communities. Facilities that must be located within the monument boundaries will be placed in such a way that they are unobtrusive, to the extent practicable.
- The SDNM RMP will not address monument boundary adjustments or proposals to change the Proclamation.

SECTION 3.0 COMMENT SUMMARY

3.1 INTRODUCTION

The scoping period commenced with the publication of the *Federal Register* notices on April 24, 2002 for SDNM and December 9, 2002 for the Phoenix South Planning Area. While comments are considered whenever they are received, BLM requested that comments to identify planning issues be submitted by March 30, 2003. Written comments were submitted to BLM on comment worksheets, in letters, and via e-mail. BLM also noted comments made during agency and tribal coordination meetings as well as other meetings with the public. BLM will continue to consider public comments throughout the RMPs/EIS process.

During the scoping phase of the project, more than 6,000 letters, comment worksheets, and e-mail messages were received and evaluated for this Scoping Report. As noted in Section 1.4.3, a total of 367 people registered their attendance at the 11 scoping meetings.

The comments were compiled, reviewed, and analyzed to identify the preliminary issues that will be addressed in the RMPs/EIS. The remainder of this section summarizes the comments received.

3.2 COMMENT COMPILATION

More than 3,600 individual comments were recorded for the Phoenix South and SDNM RMPs/EIS, although many of these comments were similar in nature and the number of unique comments is estimated at 2,000 comments. Two separate comment worksheets were circulated at each of the public meetings—one for the SDNM and the other for the Phoenix South Planning Area. The comment worksheets provided by BLM inquired about the public's values regarding the land, the type of activities important to the individual completing the worksheet, and his or her preferred management style for the resources in the area. About 3 percent, or 166 of the comment letters, were submitted on the BLM comment worksheets that individuals obtained by participating in a public meeting, received in the first planning bulletin, or downloaded from BLM's web site. Most of the comments submitted on the BLM comment worksheets came from persons with an Arizona mailing address.

Three form letters were submitted by a number of individuals, primarily through the use of e-mail. One of these form letters pertains specifically to the Saddle Mountain area, which is located within the Phoenix South Planning Area south of Interstate 10 and west of Buckeye. Another form letter pertains specifically to the national monument. The final form letter includes comments for both the Phoenix South Planning Area and SDNM.

The first of these form letters, submitted by approximately 60 individuals, requests that BLM protect the Saddle Mountain area by initiating a wilderness study for the area.

A second form letter, submitted by approximately 70 individuals, urges BLM to support and protect all five of the new Arizona national monuments and notes the public support for these monuments. This letter also asks that the BLM maintain the monuments at their designated acreages, work to ensure adequate funding for them, and not allow new or increased consumptive uses within the monument boundaries.

The final form letter, submitted by approximately 5,400 individuals (and thus accounting for about 90 percent of the total comment letters received), was created and distributed through the cooperative efforts

of the Sierra Club and the Arizona Wilderness Coalition. This letter asks BLM to adopt the transportation system for SDNM recommended by the Sierra Club, Arizona Wilderness Coalition, and other citizen groups, to prevent driving in washes and also to close roads that threaten cultural resource sites, fragment wildlife habitat, or damage plants, soils, riparian areas, and watersheds. Other issues identified to protect the national monument include discontinuing livestock grazing, acquiring state and private lands within the monument, and designating 140,506 acres as wilderness study areas. With regard to the Phoenix South Planning Area, the letter urges BLM to designate 16 wilderness study areas spanning approximately 250,000 acres.

In addition to these form letters, about 500 individuals, agencies, and/or special interest groups submitted comment letters and 166 individuals, agencies, and/or special interest groups submitted BLM comment worksheets with their unique input. Individual citizens submitted most of the letters. There were few comment letters from Federal, State, or local agencies; however, as described in Section 1.3.1, agencies were invited to participate in the planning process as cooperating agencies and some agencies will be contacted for data and will be participating in these ways. Comment letters were received from the following agencies and organization:

Federal

- Department of Defense, Davis Monthan Air Force Base, 355OSS/OSOA
- Department of Defense, Silver Bell Army Heliport

State

- Arizona Game and Fish Department
- Central Arizona Water Conservation District
- Office of Attorney General

County/Local

- Laguna Natural Resource Conservation District
- Tonopah Valley Community Council
- Western Pima County Community Council
- Yuma Natural Resource Conservation District

Tribal

- No scoping comments were received from tribal governments

Businesses

- Arizona Clean Fuels, LLC
- Arizona Public Service
- Salt River Project
- Summit Resources, LLC
- Tucson Electric Power Company
- World Trade Center Chicago (WTCC), Inc.

Organizations and Interest Groups

- Arizona Antelope Foundation
- Arizona ATV Riders
- Arizona Desert Bighorn Sheep Society

- Arizona Wilderness Coalition
- Center for Biological Diversity
- Escalante Wilderness Project
- Friends of Arizona Rivers
- Friends of Saddle Mountain
- Glendale Hiking Club
- Lady Bird Johnson Wildflower Center
- Land and Water Fund of the Rockies
- Maricopa Audubon Society
- Natural Trails and Waters Coalition
- People for the USA
- Public Lands Foundation
- Republicans for Environmental (REP) America
- Safari Club International, Northern Arizona Chapter
- Sierra Club, Grand Canyon Chapter
- Society for American Archaeology
- The Arizona Guide
- The Wilderness Society
- Tonopah Area Coalition
- Tonopah Valley Association
- Wildlands Restoration
- Yuma Audubon Society
- Yuma Valley Rod and Gun Club

General Public

- More than 6,000 total comment letters were received from individuals from the general public. Approximately 5,500 were form letters, 500 were individual letters or e-mails, and 150 were BLM comment worksheets..

The comment letters address a wide variety of issues. Because many of the letters include comments on several different issues, more than 3,600 individual comments were identified, although many of these comments were similar in nature so it is estimated that there were about 2,000 unique comments.

The comment letters were entered into an electronic database so that comments would be sorted in several ways including type of issue; geographic location; type of submitter (agency, special interest group, individual, etc.); and whether the comments pertained to the Phoenix South Planning Area, SDNM, or both planning areas.

Table 3-1 summarizes the locations from which comments were received.

Table 3-1. Geographic Sources of Comments

Location	Percent of Comment Letters
California	18.8
Arizona	9.7
New York	8.4
Washington	5.5
Pennsylvania	4.5
Texas	4.5
Colorado	4.3
Illinois	4.2
Ohio	3.7
New Jersey	3.5
Massachusetts	3.2
Oregon	3.2
Michigan	2.8
Minnesota	2.8
Wisconsin	2.4
Missouri	1.6
Indiana	1.6
New Mexico	1.4
Connecticut	1.2
Kentucky	1.0
New Hampshire	1.0
Maine	0.9
Utah	0.9
Vermont	0.8
Iowa	0.8
Kansas	0.7
Montana	0.7
Idaho	0.6
Nevada	0.6
Oklahoma	0.5
Rhode Island	0.5

Persons residing in California submitted the most comment letters, accounting for approximately 1,100 letters. Persons in Arizona submitted more than 550 comment letters with the vast majority of these letters containing unique and individualized comments. New York residents submitted nearly 500 comment letters and Washington residents submitted more than 300 comment letters. Residents of other states submitted fewer than 300 comment letters per state.

Although not listed in Table 3-1, persons residing in Louisiana, Florida, Arkansas, Hawaii, Wyoming, Alaska, Nebraska, Maryland, North Carolina, North Dakota, South Dakota, Georgia, Virginia, Tennessee, West Virginia, South Carolina, Alabama, Mississippi, the District of Columbia, and Nova Scotia also submitted comments with from 1 to 25 letters submitted by each of these states and Canadian provinces, which represents less than 0.5 percent of the total comments per state.

3.3 SUMMARY OF PUBLIC COMMENTS

As noted in Section 2.2, public comments addressed a wide variety of resource categories. In addition to these resource categories, the public offered information about values, activities, and desired management. As noted in Section 1.4.3, BLM created a comment worksheet that was distributed to public participants at each scoping meeting. The worksheet was designed to encourage the public to provide input about (1) what features or qualities they value regarding public lands, (2) what activities or uses on the public lands are important, and (3) how they would like to see BLM manage the resources within the planning areas. In addition, BLM questioned if there was other comments the public would like to share. Approximately 400 of these worksheets were returned to BLM during the scoping period. With regard to public values and activities, many comments pertained to both the Phoenix South Planning Area and SDNM; when a planning area was specified, another individual often identified the same value or activity for the other planning area.

The comments were further analyzed and issues identified by major resource category for each planning area. The following 18 resource categories were defined: soil, water, and air resources; biological resources; grazing management; wild horses and burros; fire management; mineral and energy resources; lands and realty; recreation; wilderness and special management areas; visual resources; transportation and access; airspace; law enforcement; socioeconomics; public participation and education; cultural resources; Native American issues; and public health and safety. For some of these resource categories, specific resource topics were defined within the category (e.g., special status species is a topic within biological resources). Within each resource topic, issues were identified as those (1) issues to be used in the development and analysis of EIS alternatives, (2) issues that will not be addressed (including rationale), and (3) issues that can be addressed administratively. Resource-specific planning criteria and management concerns are also presented.

Issues to be used in the development and analysis of the EIS alternatives include those comments that will be used to develop alternatives or that will guide the focus of the analysis. For example, comments were received on camping. Alternatives that could be developed for camping might include (a) provide developed campgrounds; (b) do not develop campgrounds, but allow for primitive camping; and (c) designate areas for car camping to concentrate related resource impacts in areas that are not environmentally sensitive and do not allow campfires for primitive camping by backpackers. In addition to the issues identified by the public during the scoping process, in some cases BLM has identified management concerns that were not identified by the public, but add to the issues to be used in the development and analysis of EIS alternatives.

Issues that will not be addressed might include comments that are not pertinent to the planning area or areas within the planning area where there are no BLM-administered lands; for example, provide cherry stem access of existing roads in the Cabeza Prieta National Wildlife Refuge. Another example might include comments suggesting an activity that is not allowed based on the parameters of the Presidential Proclamation establishing SDNM. For example, a comment to allow mining in SDNM will not be considered because lands within SDNM are closed to mineral development (subject to valid existing rights) by the Proclamation.

Issues that can be addressed administratively include those issues that do not require a plan decision but can be addressed immediately through administrative action by BLM. Examples include comments such as continue to educate the public about appropriate off-road driving behavior, involve local tribes in the planning process, and remove trash from the monument.

The representative comments are actual statements that were made in comments received during the scoping period. Brief issue-related statements that pertained to the 18 resource categories as well as public

values and activities were selected to be representative of the types of comments that were received on the issue. These were selected by analysts who had reviewed a majority of the approximately 500 comment letters with unique input and the three form letters submitted by more than 5,500 commenters. When available, the agency or organization that made the comment was noted or, if the comment was from an individual, the city and state of the commenter's address were used to attribute the comment. While the statements were selected from the comment letters for content related to issues by resource category, efforts were made to include some additional content of the comment statement to provide further context. Some representative comments apply to more than one resource category and may or may not appear more than once within this report. The number of representative comments presented does not necessarily represent the relative number of comments received on the issue; rather, it is more representative of the variety of viewpoints and context in which those issue statements were received. In some cases, minor spelling or typographical corrections were made within the quoted statements. However, no other changes were made to these statements; they are as they appear in the comment letters, forms, and e-mails.

3.3.1 PUBLIC VALUES

Based on the comments received on the comment worksheets together with other submitted comments, the following features or qualities (in no particular order) are valued by various members of the public. Those qualities mentioned most frequently pertained to the area's natural beauty, the quiet peaceful surroundings, and a place to "get away from it all" without having to travel great distances. The natural ecosystems, wildlife, cultural resources, and scenic views were identified values. The freedom to use the public lands without restriction also was mentioned frequently.

- Maintaining large blocks of public land to preserve biological diversity
- Wildlife and plant species, particularly those endemic to the area
- Open space/undeveloped areas
- Watershed
- Wildlife habitat
- Rangeland
- Quietness of vast desert regions
- Observing plants and animals in their native setting
- Escaping noise
- Beauty of the mountains and valleys/aesthetics
- Public access
- Solitude/remoteness
- Cultural values and archaeology
- Wildlife protection
- Rich diversity of plant and animal life
- Protection from urban sprawl
- Minimal impacts from recreation
- Wildflowers
- Native American and European-American history of the area
- Naturalness of the area
- Geology

- Proximity to the Phoenix metropolitan area

Representative Comments

“I value these lands because they are also important for humans; as a "refuge" from urban life and a place for aesthetic, physical and philosophical reflection.” – Individual, Phoenix, Arizona

“The ability to hike, see wildlife, camp out and take nature walks, see remnants of former cultures, because all these activities can often be conducted without intrusion.” – Individual, Rosedale, Arizona

“Places where natural ecosystems and the species that inhabit them can continue to exist. Solitude and a chance to get away from the mindless bustle of the city.” – Individual, Phoenix, Arizona

“I value the wilderness characteristics of solitude, quiet, and untrammelled-by-man wildlands.” –Individual, Tucson, Arizona

“The uniqueness of the Sonoran Desert is what I value most about these areas. The ability to go out and explore and experience the desert in its natural setting is important.” –Individual, Wickenburg, Arizona

“I value the biological diversity and uniqueness of this desert region. Also the quietness that vast desert regions offer is important to me. These large, intact pieces of Sonoran Desert give me a place to escape and lose myself, in the natural world.” – Individual, Tucson, Arizona

“I value biodiversity and natural processes. I value quiet and solitude. I value the unique and irreplaceable Sonoran Desert, its beautiful washes, mountains and bajada.” – Individual, Tucson, Arizona

3.3.2 PUBLIC ACTIVITIES

A review of the comments indicates that the public enjoys a wide variety of activities on public lands. Of the activities listed below, those most frequently mentioned included hiking, hunting, sight seeing, camping, and observing wildlife. Some of the mentioned activities were only noted by a few individuals, such as woodcutting, birding, drawing, and harvesting surface minerals.

- Sight seeing
- Hunting
- Hiking
- Camping and primitive camping
- Viewing wildlife
- Viewing ancient sights/remnants from former cultures
- Assisting wildlife habitat
- Driving 4-wheel vehicles
- Target shooting
- Woodcutting
- Participating in wildlife habitat conservation projects
- Birding
- Studying area history
- Bicycling/Mountain biking
- Riding all-terrain vehicles (ATVs)
- Harvesting surface minerals
- Backpacking

- Drawing
- Picnicking
- Taking photographs

Representative Comments

“Hiking, observation of natural and cultural history are the most important activities for me on these public lands.” – Individual, Tucson, Arizona

“I have been using this area for hunting and for access to hunting areas for 15 years. I have hiked all over this area. My wife and I frequently take day trips in this area.” – Individual, Maricopa, Arizona

“We like to enjoy the scenery and atmosphere of the area, hiking, birding, etc. It is important to be able to find pristine areas with the peace and quiet to compensate for the hectic city.” – Individual, Phoenix, Arizona

“Non-motorized activities are important to me—hiking, horseback riding. They provide a quiet and relaxing, experience.” – Individual, Wickenburg, Arizona

“The best aspect of the BLM lands is that they provide for active use by citizens rockhounding, prospecting, off-roading, hunting, etc.” – Individual, Glendale, Arizona

Activities: “Outdoor recreation, hunting, camping, 4-wheeling primitive roads. Remote activity away from town but close enough to do in one day.” – Individual, Tucson, Arizona

3.3.3 DESIRED MANAGEMENT

A review of the comments indicates that the management directions most frequently offered are to manage for resource protection and to provide public access to the lands. Many of the comments about management are captured in the next section on issues by resource category. The comment summaries that follow give examples of the type of management direction that the public recommends. Most of the comments on management pertained to both the Phoenix South and SDNM planning areas. A few that were specific to the monument were (1) do not turn the monument into a “developed monument,” (2) continued military use could provide a useful measure of protection for small parts of the monument, and (3) manage in the context of the surrounding Arizona communities as well as for national interest.

- Be realistic in the management actions that are proposed in recognition of BLM’s limited personnel and financial resources.
- Preserve public lands and limit encroachment.
- Manage for the restoration and protection of natural processes.
- Leave the wild lands alone and do not be influenced by the money interests.
- Manage on a regional scale, when possible, that includes the Phoenix South Planning Area, Tohono O’odham Nation, Organ Pipe Cactus National Monument, Barry M. Goldwater Range, and Cabeza Prieta National Wildlife Refuge.
- Maintain public availability to the assets of these public lands.
- Manage for biodiversity.
- Develop a resource monitoring plan with specific values and corrective actions.
- Do not restrict or curtail public use.

- Continue to manage for multiple uses in accordance with FLPMA.
- Establish policies to guarantee continued access to open space.
- Develop a database of individuals to help maintain trails on a volunteer basis to defer maintenance costs.
- Safeguard the undeveloped character of the area.

Representative Comments

“If all federal and state lands contained therein could develop a collaborative master plan, a big step for landscape level management could be taken. Great potential for connectivity, corridor management, and managing wildlife and human interactions constructively could be realized. A resource monitoring plan should be developed, with specific values, which when attained or exceeded, require corrective actions.”
– Yuma Audubon Society

“I’d like to see the various land agencies work in cooperation with one another more often.” – Arizona ATV Riders

“The first crucial step will be to identify and as precisely as possible map resources to enable future informed decisions to be taken concerning allowable activities. I hope that the BLM will adopt a policy that allows for careful impact consideration before any land holdings are sold or released in the future.”
–Individual, Colondale, Arizona

“Preserve these resources for future generations. Consider removing grazing, it interferes with wildlife habitats and destroys cultural sites. Create a transportation plan that will protect resources while allowing reasonable access.” – Individual, Tonopah, Arizona

3.4 ISSUES BY RESOURCE CATEGORY

3.4.1 PHOENIX SOUTH PLANNING AREA

3.4.1.1 Soil, Water, and Air Resources

3.4.1.1.1 Soil Resources

Planning Criteria

Proposed decisions will be measured against the Arizona Standard for Rangeland Health Standard 1; upland soils will exhibit infiltration, permeability and erosion rates that are appropriate to soil type, climate, and land form (ecological site) to ensure long-term soil productivity. Best management practices will be incorporated into programs to minimize soil erosion and compaction resulting from management actions.

Issues Overview

There were very few comments that pertained specifically to soil resources. Concerns about impacts on soils, increased erosion, etc. were noted in respect to activities such as off-highway vehicle (OHV) use and livestock grazing. Within the planning area, there were specific comments regarding erosion impacts in the area west of Ajo.

Representative Comments

“Restoration of soil and vegetation should also be a priority in the management plan.” – Individual, Davis, California

“[R]epair soil and vegetation on overgrazed parcels.” – Center for Biological Diversity

“I hate to see the over-grazing with the damage being done to the soil resource.” – Individual, Ajo, Arizona

Issues to be used in the Development and Analysis of EIS Alternatives

Public Issues

- Restore soils impacted by over grazing.
- Rehabilitate roads that have caused increased erosion.
- Evaluate erosion impacts from ATV use in the hills to the West of Ajo (between Dorsey and Norton or even Rasmussen streets).

BLM Management Concerns

Concerns regarding soil resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish reclamation goals for disturbed areas that will ensure that soils are stable.
- Identify any watersheds designated by the Arizona Department of Environmental Quality (ADEQ) as Category I watersheds and identify decisions or restoration actions that should be considered.

3.4.1.1.2 Water Resources

Planning Criteria

Water Quality - Section 319 of the Clean Water Act obligates Federal agencies to be consistent with State Non-point Source Management Program Plans and relevant water quality standards. Section 313 requires compliance with State Water Quality Standards. BLM will coordinate with ADEQ regarding their Total Maximum Daily Load (TMDL) program and other relevant water quality programs. BLM will incorporate applicable best management practices or other conservation measures for specific programs and activities into the RMP. Water quality will be maintained or improved in accordance with State and Federal standards. Proposed decisions within the planning area will be in compliance with the Clean Water Act, Federal and State water quality standards, and BLM/ADEQ agreements.

Water Rights – Where the need for water rights is identified on the public lands, BLM will file for water rights in accordance with State Law. BLM will continue to quantify and notify the State of its Federal reserved water rights in the designated wilderness areas, in accordance with the Arizona Desert Wilderness Act of 1990.

Issues Overview

Comments that pertained specifically to water resources primarily promoted protection of the watershed and riparian areas. There were a few comments about protecting surface waters. (Comments regarding

wildlife water developments are addressed in Section 3.4.1.2.1 and waters associated with livestock grazing allotments are addressed in Section 3.4.1.3.) There also were some comments about depletion of groundwater resources. The potential impacts on water rights from land disposal, acquisition, or exchange is a concern. In the Phoenix South Planning Area in particular, there is concern for the water rights associated with the parcel of land that surrounds the Ajo Airport.

Representative Comments

“Watershed is crucial for the maintenance of the ecosystem so streams and riparian areas must be protected as well as ground water preserved.” – Individual, New Orleans, Louisiana

“Another concern for the disposal of the land concerns the aquifer that supplies water to the community of Ajo. The aquifer is located partially under the area identified as the Ajo Airport Parcel, and the wells that supply water are adjacent to this parcel.” – Western Pima County Community Council

“Protect and restore springs and seeps, for critical wildlife water sources.” – Individual, unspecified community

“No drilling for oil, gas or water and no land exchanges or water rights transfers.” –Individual, Apache Junction, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Factor in water resources in the development of the management plans.
- Restore riparian areas.
- Identify any perennial water streams and/or pools.
- Consider groundwater depletion.
- Protect streams and riparian areas and preserve groundwater because the watershed is crucial for the maintenance of the ecosystem.
- Protect and restore springs and seeps.
- The aquifer that supplies water to the community of Ajo partially underlies the area identified as the Ajo Airport Parcel, and the wells that supply water are adjacent to this parcel. What are the water rights implications if this parcel is identified for disposal?
- Identify and address water resources and water rights in acquisitions and exchanges.

BLM Management Concerns

Concerns regarding water resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Identify any watersheds designated by ADEQ as Category I watersheds and identify decisions or restoration actions that should be considered.

Issues That Will Not Be Addressed

- Local aquifers are being depleted and mineral-laden water is being pumped to the surface, polluting waterways and killing vegetation.

Rationale: There are certain contexts where the consideration of groundwater depletion would be appropriate in the EIS (i.e., in the evaluation of the baseline condition and in the cumulative effects analysis). However, the subject of this comment, which refers to large-scale industrial and agricultural operations, is beyond the scope of the EIS.

- Restore water to the rivers.

Rationale: The BLM does not control water rights on any of the rivers in the planning area, and it's extremely unlikely that any management actions on BLM's part could accomplish water flow restoration.

3.4.1.1.3 Air Resources

Planning Criteria

Air Quality – Maintain and enhance air quality and visibility in a manner consistent with the Clean Air Act. Under the Clean Air Act, BLM administered lands were given a Class II air quality classification unless reclassified by the State. Wilderness areas and national monuments must be classified as Class I or Class II. This classification allows moderate deterioration associated with moderate, well-controlled industrial and population growth. Proposed decisions within the influence zone of the planning project that may affect non-attainment areas, including the Maricopa County particulate matter of 10 microns (PM₁₀) non-attainment area, will be assessed for conformance with air quality standards.

Issues Overview

Very few comments were received that pertain to air quality. Those that were received pertain to the dust and air pollution that results from driving vehicles.

Representative Comments

“Please look closely at the hills to the West of Ajo (between Dorsey and Norton or even Rasmussen streets) - the ATVs have so dug up the hills that they are eroding. Dust is an issue as is noise.”

– Individual, Ajo, Arizona

“You use your car because there are roads to take you anywhere you like. Our world is designed by us to be that way. But in the wilderness someone scares the environment away and creates air pollution by sitting on their butt and riding out to 'someplace'. I go out in the woods and wilderness to get away from the smog. You're hurting the area you're going in to see and be a part of.” – Individual, Hancock, New Hampshire

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- ATV use west of Ajo is resulting in dust.
- Driving vehicles to the wilderness creates air pollution and defeats the value of going to the wilderness to get away from the smog.

BLM Management Concerns

Concerns regarding air resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider the effect of public uses on air quality, particularly the use of dirt roads with regard to PM₁₀ non-attainment areas.

3.4.1.2 Biological Resources

3.4.1.2.1 Vegetation, Invasive Species, Riparian Areas, Wildlife Habitat, and Wildlife Waters

Planning Criteria

Vegetation and Habitat Management

Proposed decisions will be measured against the Arizona Standard for Rangeland Health for desired plant communities that provide for biodiversity and protection and restoration of native species. Vegetation will be managed to achieve desired plant communities (considering the ecological site potential) that provide for biodiversity as well as protection and restoration of native species. The plant communities will be managed to protect, improve, and restore communities to provide wildlife habitat and non-consumptive uses including plant protection, visual quality, watershed protection and stability, and water quality. Provisions may be made for hazardous fuels reduction and habitat restoration.

Invasive Species and Noxious Weed Control

BLM will work with county, State, Tribal, and Federal agencies, individuals, and Weed Management Areas to monitor, manage, and control noxious weeds and invasive species. Invasive species and noxious weed control will be considered in the plans in accordance with the integrated weed management guidelines and design features identified in National, State, and local BLM programs and policies. Invasive species and noxious weed infestations will be prevented, contained, and/or reduced on BLM-administered public land using an integrated pest management approach. Proposed decisions will be assessed to determine whether or not they would contribute to the introduction or spread of noxious weeds or invasive species in accordance with the Federal Noxious Weed Act and Executive Order 13112. Management practices that prevent and control invasive species will be emphasized.

Riparian Areas, Floodplains, and Wetlands

Proposed decisions will be measured against the Arizona Standard for Rangeland Health for riparian areas, floodplains, and wetlands that provide for biodiversity and protection and restoration of native species. Riparian areas, floodplains, and wetlands will be managed to protect, improve, and restore their natural functions to benefit water storage, groundwater recharge, water quality, and fish and wildlife values. All management practices will be designed to maintain or improve the integrity of these high-priority values, in accordance with the Clean Water Act and Arizona's Standards for Rangeland Health. Management activities in floodplains will be consistent with Executive Order 11988 and management activities for wetlands and riparian areas will be consistent with Executive Order 11990.

Issues Overview

Comments regarding vegetation were often associated with the value of the vegetation as wildlife habitat and focused on the need to protect vegetation. Some concerns were expressed about invasive plant species and the problems that result for the quality of the habitat as well as the increased potential for fires that burn hotter than would normally occur in the desert environment. Comments regarding the effects on vegetation from grazing management are addressed in Section 3.4.1.3.

Likewise, most comments regarding riparian areas, wetlands, and floodplains focused on the protection of these resources for their contribution to wildlife habitat or to the watershed. Issues associated with their value with regard to water resources are addressed in Section 3.4.1.1.2.

Compared to the issues of vegetation, invasive species, or riparian areas, wetlands, and floodplains, there were considerably more comments regarding wildlife habitat and wildlife management. Many comments expressed general concern for the proper management and/or preservation of wildlife and wildlife habitat. There were often specific examples or concerns for particular species or a category of species (e.g., native fauna, migratory species, saguaro, etc.), type of habitat (e.g., mountain chains, riparian areas, wildlife corridors), or type of impact (e.g., feral burros, motorized vehicle use, habitat fragmentation, etc.). Some comments emphasized the importance of ecosystem and biodiversity management. Some commenters were particularly interested in providing for habitat restoration and/or general habitat improvement projects. There were many comments that pertained to general wildlife and wildlife habitat as well as special status species, such as Sonoran pronghorn, cactus ferruginous pygmy-owl, desert tortoise, etc. These comments are addressed under Section 3.4.1.2.2. Many comments supported the involvement of the AGFD for management of wildlife and wildlife habitat and for wildlife-dependent outdoor recreation/hunting. Few comments address specific biological resource issues in the Phoenix South Planning Area, although one comment noted the impacts of recreational shooting on saguaros in the canyon off of Mayer Road in Maricopa.

Various wildlife water development programs, initiated in the 1940s and 1950s throughout the western United States, have provided sources of free-standing water under the assumption that this is a key limiting factor on wildlife populations in arid habitats. Such developed waters are attempts by resource managers to benefit target species (typically desert bighorn sheep, mule deer, javelina, other game species, and other wildlife). Ranchers and range managers also have developed water resources for livestock and those waters are used by wildlife. More recently, wildlife water developments have received critical scrutiny as the need for the continued development of new water sources has been questioned. Critics have suggested that wildlife water developments have not yielded expected benefits and may negatively impact wildlife (especially non-targeted species) by increasing predation, competition, and disease transmission. The scientific community in Arizona, led by the efforts of the AGFD, are studying whether developments are necessary for wildlife, what effect developments might have on populations of non-target animals (such as predators), and the development of additional wildlife waters.

Scoping comments received regarding wildlife water developments represent both sides of this debate. Some commenters are advocating that no new wildlife waters be developed and other commenters are stressing the importance of allowing the continued access, maintenance, redevelopment, and/or construction of wildlife waters. Generally, there were an equal number of commenters supporting each of these viewpoints.

Representative Comments

“Close any road that fragments wildlife habitat, damages plants, soils, and riparian areas or watersheds.”
– Individual, Denton, Texas

“The Sonoran Desert is a unique precious eco-system. I want it to be protected—especially for its wildlife. So much of the desert has already been eaten by development. If it were up to me, all future development would require habitat protection.” – Individual, Tucson, Arizona

“We need to protect these natural resources (especially wildlife & habitat) because this is the creation. Can't let it be destroyed.” – Individual, Mesa, Arizona

“The most important thing to me is to establish or protect wildlife corridors.” – Individual, Tucson, Arizona

“Do not allow any new artificial water developments.” – Individual, Avondale, Arizona

“Artificial water developments must not only be maintained and enhanced, they must be increased where needed. Contrary to what you will hear from the environmental extremists, in this century, with the depletion of the water table, and water sources that were here historically, these are necessary for the continued well being of the species that live in the area. The limited motor vehicle passage to do this will do no harm.” – Individual, Oro Valley, Arizona

“Focusing on wildlife waters ignores other requirements for animal survival, such as food sources, freedom from harassment, and more. For most species, we have probably just begun to know all the parameters that affect population viability. BLM should manage for ecosystem vitality and focus on that and not on just single or a few species. In general, development of artificial wildlife waters has focused on benefits to a very limited number of species without considering the needs of other species.” – Yuma Audubon Society

“Examples of proven proactive wildlife management and conservation activities that should be identified in this RMP/EIS include but are not limited to waterhole development, waterhole maintenance, water hauling and the necessary reasonable vehicular access to accomplish all of the above without compromise.” – Arizona Desert Bighorn Sheep Society

“Protect and restore springs and seeps, for critical wildlife water sources.” – Individual, unspecified community

“Because of human population growth, cooperative wildlife habitat improvement projects must occur.” – Individual, Yuma, Arizona

“Wildlife needs must be foremost including connection of habitat for migratory species such as desert big horn sheep, avian needs, desert tortoise, roadless areas.” – Individual, Mesa, Arizona

“It is imperative that BLM works closely with AGFD to ensure wildlife, wildlife habitat and wildlife dependent outdoor recreation continues.” – Individual, Yuma, Arizona

“The feral burros are also causing problems for the wild animals.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues - Vegetation and Invasive Species

- Repair vegetation on overgrazed parcels.
- Eradicate non-native grasses and restore native grasses.
- Protect native flora and restore damaged vegetation.
- Eradicate invasive species as they threaten wildlife and create a significant fire risk.
- Address management of burros, feral goats, trespass cattle, and renegade ostriches in a timely manner, or expeditiously remove these non-native and habitat damaging animals.
- Address recreational shooting impacts to saguaros.

Public Issues - Riparian Areas, Wetlands, and Floodplains

- Close roads that damage riparian areas or watersheds.
- Protect and restore springs and seeps.

Public Issues - Wildlife and Wildlife Habitat

- Protect existing wildlife corridors, particularly for migratory species, and establish corridors by restoring washes and habitat.
- Establish wildlife habitat improvement projects.
- Work in partnership with the AGFD to manage wildlife.
- Work closely with AGFD to ensure wildlife, wildlife habitat, and wildlife-dependent outdoor recreation continues and is not impacted by personal agendas or wilderness designations.
- Preserve natural habitat and manage for wildlife protection.
- Rehabilitate vehicle routes that fragment habitat.
- Look at wildlife species' needs including roadless areas.
- Create a preserve with minimum impact activities allowed.
- Manage food and habitat resources for the Mexican freetail bat, which is important for limiting insects across the desert Southwest.

Public Issues - Wildlife Waters

- Do not allow/avoid the development of new wildlife waters.
- Maintain existing wildlife water developments and construct new wildlife water developments (if deemed necessary).
- Allow development and maintenance of both artificial and modified natural waters.
- Allow the necessary reasonable vehicular access to accomplish wildlife water development, maintenance, and water hauling.

BLM Management Concerns

Concerns regarding vegetation, invasive species, wildlife habitat, wildlife, and wildlife waters to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish desired plant communities, guidelines, and objectives for restoration, revegetation, and reclamation of disturbed lands.
- Evaluate the impacts from OHV use and improper livestock grazing.
- Continue to identify, map, and treat invasive species, including noxious weeds, as a management priority within the planning area.
- Evaluate whether invasive wildlife species may be adversely impacting native wildlife species in some areas.
- Address the need to implement efforts to eradicate invasive wildlife species where warranted. Efforts will be coordinated with the AGFD.
- The value of wildlife waters is controversial. There is documentation that supports that developed waters are used by many species, including the targeted big game species for which they are often

developed, threatened and endangered species, and avian species. However, others argue that developed waters may be poorly designed, create opportunities for predators to find prey species in vulnerable locations, and attract bees of which most must be assumed to include Africanized (killer) bees, and could potentially spread disease among wildlife.

- Evaluate the information regarding wildlife water development, particularly in coordination with the AGFD as the agency responsible for the State's wildlife. Decisions will be made regarding whether existing water developments will be retained on BLM-administered public lands and regarding the future program for wildlife water developments.
- Consider use of game carriers for retrieval of large game.
- Consider woodcutting restrictions if needed to protect resources.

Issues That Will Not Be Addressed

- Protect and restore native fish populations impacted by dams and non-native species.
Rationale: Many segments of the rivers within the planning area are typically dry and flow only in response to storm events. The water in the portion of the Gila River that passes through the planning area is mostly agricultural return, is full of non-native fish, and is not suitable for fishing due to the potential health hazards that may be associated with agricultural return water.

Issues That Can Be Addressed Administratively

- Encourage user groups to participate in habitat restoration projects.
- Remove the feral burros that compete with wildlife for the habitat.
- Address management of burros, feral goats, trespass cattle, and renegade ostriches in a timely manner, or expeditiously remove these non-native and habitat damaging animals.

3.4.1.2.2 Special Status Species

Planning Criteria

Management decisions will be designed to enhance and maintain habitat for threatened and endangered species. Management actions authorized, funded, or implemented by BLM will be done so as not to jeopardize the continued existence of Federally listed threatened or endangered plant or animal species or result in the destruction or adverse modification of critical habitat. Species proposed for Federal listing and proposed critical habitat will be given the same consideration as listed species. Candidate species and BLM and State sensitive species will be managed so as not to contribute to the need to list as threatened or endangered. The intent is to recover listed species and maintain healthy populations of all other species and therefore avoid the need for further listing of any species as threatened or endangered. Terms and conditions and conservation measures from the biological opinion will be incorporated into the plans.

Issues Overview

Many of those who commented on general wildlife and wildlife habitat also commented on special status species, but the comments are addressed here due to the uniqueness of special status species management. These comments focused on the protection of threatened and endangered species and their habitats. Some comments were general in nature, while others mentioned particular species (e.g., Sonoran pronghorn, cactus ferruginous pygmy-owl, desert tortoise) or management concerns (e.g., fawning/nesting sites, impacts of grazing, effects of off-road driving, etc.). Comments on this topic specific to the Phoenix South Planning Area concerned Sonoran pronghorn management in the Ajo area.

Representative Comments

“I am interested in preserving endangered species of both plants and animals.” – Individual, Somerton, Arizona

“In the Ajo BLM lands, manage for protection of Sonoran pronghorn habitat more aggressively.”
– Individual, unspecified community

“Assist in the protection of the remaining Sonoran Pronghorn and their habitat in the Sonoran Desert.”
– Arizona Wilderness Coalition

“All habitat for Desert Bighorn and Desert Tortoise and all T&E species should be protected as ACECs to insure protection of these species habitat.” – Individual, unspecified community

“[P]reserve and protect species of concern populations where they occur, including habitat restoration where needed” – Individual, Phoenix, Arizona

“The BLM should fight any effort to name any animal or plant as endangered, stand up to the Fish & Wildlife service for once, extinction is natural and no one cares if some little bird or rat dies off.”
– Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Protect threatened and endangered species and their habitat.
- Pursue special management activities, such as developed waters, for Sonoran pronghorn.
- Stop all grazing within Sonoran pronghorn and desert tortoise habitat.
- Evaluate the effects of grazing on Sonoran pronghorn and desert tortoise habitat areas.
- Manage in a manner that would allow for implementation of an emergency water project for special status species in the event of prolonged drought.
- Manage for Sonoran pronghorn in the Ajo area.
- Protect special status species habitat by designating the habitat as an ACEC.
- Address woodcutting restrictions resulting from the cactus ferruginous pygmy-owl management actions.

3.4.1.3 Grazing Management

Planning Criteria

BLM will manage grazing through existing laws, regulations, and policies including the *Arizona Standards for Rangeland Health and Guidelines for Grazing Administration*. BLM will provide for livestock management in an environmentally sensitive manner consistent with resource management objectives, including achieving desired plant communities, and land use conditions. Proposed decisions will determine if allotments are open or closed to grazing in accordance with the Taylor Grazing Act and, if open, in what manner. Decisions will include a strategy for ensuring that proper grazing practices are followed while preserving habitats for sensitive plant and wildlife species. Appropriate best management practices will be followed to protect rangeland resources and, where necessary, to mitigate any conflicts with other uses and values. Administrative actions to assure compliance with existing permit/lease

requirements, to modify permits and leases, to monitor and supervise grazing use, and to remedy unauthorized grazing use will continue.

Issues Overview

Most comments regarding livestock grazing pertained to better management of livestock grazing or were in favor of ending livestock grazing on public lands. Some did not necessarily oppose livestock grazing, per se, but rather opposed overgrazing. Those advocating ending all livestock grazing often noted that the natural conditions do not support livestock grazing and expressed concern for the adverse impacts of this use on natural and cultural resources. Those that supported continued livestock grazing typically noted that this is a traditional land use and is beneficial when appropriate range management practices are employed. There were some who advocated prohibiting certain kinds of grazing (e.g., year-round, domestic animals, stock grazing) and those who advocated prohibiting grazing in certain areas (e.g., Sonoran pronghorn and/or desert tortoise habitat, riparian areas), or under certain conditions (e.g., drought, when not sustainable). Some comments addressed the economic aspects of livestock grazing, as further addressed in Section 3.4.1.14.

Of those comments that were specific to the Phoenix South Planning Area, concerns for the impacts of grazing near Saddle Mountain were noted.

Representative Comments

“Proper grazing has been an ongoing and beneficial use of the land and should continue, again subject to those using the lands doing so properly.” – Individual, Oro Valley, Arizona

“The Sonoran Desert does not support livestock grazing and request that you begin removal of these uses as leases expire.” – Individual, Fresno, California.

“I would like to see the cattle removed as there is too much competition for a small amount of feed and water and the native wild animals are losing.” – Individual, Ajo, Arizona

“In the current planning, BLM must consider ending public lands grazing throughout the entire planning area.” – Escalante Wilderness Project

“Grazing should be done in a sustainable way.” – Individual, Phoenix, Arizona

“Full market rates should be applied to all grazing leases.” – Individual, Laveen, Arizona

“BLM lands have been over grazed in recent years, perhaps exacerbated by the multi-year drought. Consider to buy-out or retire permits within the planning units.” – Individual, unspecified community, Arizona

“Cattle grazing, while economically marginal, has been a feature of Arizona land use for decades.” – Individual, Tempe, Arizona

“What opportunities are there to acquire grazing permits and reduce the grazing intensity on the public lands?” – Friends of Arizona Rivers

“Do not allow poor grazing practices.” – Individual, Phoenix, Arizona

“Grazing fees on BLM land lag far behind what the states charge and are only about 1/10 of what private landowners charge. This amounts to a give-away of public land resources to grazing animals that can denude the landscape, wiping out native species and encouraging growth of invasive and polluting waterways with sediment and waste. The BLM needs to increase grazing fees and use this money to hire more staff to study and protect the land.” – Individual, San Carlos, California

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Remove the cattle as there is too much competition for a small amount of feed and water and the native wild animals are losing.
- Prohibit grazing of domestic animals.
- Stop all grazing within Sonoran pronghorn and desert tortoise habitat.
- Mining and grazing contribute to Federal receipts and help reduce the financial burden of management.
- Ban cattle from all riparian areas.
- Address responsibility for maintenance of waters, windmills, water tanks, etc. if grazing allotments are not renewed.
- Allow grazing to continue, when managed properly.
- Do not allow poor grazing management practices.
- Take harsh disciplinary action for overgrazing, including cancellation of the grazing lease.
- Eliminate year-long livestock grazing as the lands are poorly suited for such use and the existing ranch operations are marginal; classify these lands for ephemeral grazing only.
- Evaluate the effects of grazing on sensitive Sonoran pronghorn habitat areas.
- Prohibit stock grazing.
- Limit range improvements and require the lessee to pay for them.
- Address impacts of livestock overgrazing near Saddle Mountain.
- Do not grant new grazing rights.

BLM Management Concerns

Concerns regarding grazing management to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping) are as follows:

- Consider redesignation of public land to other uses (that may preclude grazing). If such adjustments are considered, size and shape adjustments to grazing allotment boundaries also may be considered.
- Evaluate existing and potential range improvements, including maintenance, to determine if they are compatible with land management goals.
- Re-evaluate the grazing classification for perennial and ephemeral (i.e., seasonal) allotments.
- Consider the application of the ephemeral rule to grazing on public lands.

Issues That Will Not Be Addressed

- Increase grazing fees and use this money to hire more staff to study and protect the land. Grazing fees on BLM land lag far behind what the states charge and are only about 10 percent of what private landowners charge.

Rationale: BLM has no authority to adjust or change the grazing fee; it is set by a formula contained in law, as is the disposition of the fees collected.

3.4.1.4 Wild Horses and Burros

Planning Criteria

Management of the Painted Rock Wild Burros and Herd Area will be considered, including assessment of Appropriate Management Levels for burros and ongoing monitoring to ensure limits set by the Arizona Rangeland Health Standards are maintained.

Wild horses and burros outside Herd Areas will be removed from the public lands.

Issues Overview

There were a few comments that pertained to wild horses and burros. AGFD expressed concerns with the management of wild burros in the Painted Rock Herd Area due to lack of water resources and trespass issues on private and other properties. Other comments mentioned burros, but these were primarily in context of wildlife and wildlife habitat management. One comment that pertained the most to the BLM wild horse and burro program stated that there was no history of wild burro use and no herd management areas and, thus, there is no reason to have the wild horses and burro program for the planning areas. There were no comments specific to the Phoenix South Planning Area on this topic.

Representative Comments

“Wild and feral burros should be kept out of these areas. There is little or no history of past burro use; there are no herd management areas; and there is no need to bring into this area the problems which wild and feral burros are causing to desert vegetation and wildlife in Yuma, La Paz and Mohave Counties.”
– Public Lands Foundation, Phoenix

“Burros, feral goats, trespass cattle and renegade ostriches should all be addressed in the RMP/EIS and a means provided to manage, in a timely manner, or expeditiously remove, these non-native and habitat damaging animals.” – Arizona Desert Bighorn Sheep Society

“The feral burros are also causing problems for the wild animals.” – Individual, Ajo, Arizona

“The Dept. continues to have concerns with management of burros within the planning areas. The Department continues to oppose the establishment of a Herd Management Area (HMA) with an Appropriate Management Level (AML) designated for the Painted Rock Herd Area (HA). Management of burros in this area would be difficult due to lack of perennial water sources and trespass burro issues onto private and other properties. The Dept. believes that an evaluation of this HA has already been conducted and that the decision to not establish an HMA and AML has already been made. We are unaware of any new data that would change that analysis and decision.” – Arizona Game and Fish Department.

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Do not establish additional wild horse and burro management within the planning areas.
- Establish the appropriate management level for the Painted Rock Herd Area.

BLM Management Concerns

Issues That Will Not Be Addressed

- Do not implement wild horse and burro management in the planning areas.
Rationale: The BLM must implement wild horse and burro management for the Painted Rock HA as it is already established in prior planning.

Issues That Can Be Addressed Administratively

- Remove feral burros.

3.4.1.5 Fire Management

Planning Criteria

Fire decisions made in the Arizona Statewide LUP Amendment for Fire, Fuels, and Air Quality EA, initiated in 2003, will be incorporated into the Phoenix South and SDNM Plans. Adjustments to the fire decisions, if required, will be consistent with the Federal Wildland Fire Policy, the National Fire Plan, and all other BLM policy.

Fire suppression will be accomplished with the least amount of surface disturbance and to protect significant cultural or paleontological values. Public lands and resources affected by fire will be rehabilitated in accordance with the objectives identified for the affected area, subject to BLM policies and available funding.

Issues Overview

Comments on the fire management issue focused on a propensity of invasive plant species, which often have more dense stands than occur within native plant communities, to carry wildfires that are destructive to many native species including saguaro. Commenters urged the BLM to eradicate invasive species and restore native grasses to reduce destructive wildfire risks and benefit native wildlife.

Representative Comments

“Maintain & bring back native grasses & retire non-native grasses with fire or other methods. Hot fires of non-native grasses kill saguaros” – Maricopa Audubon Society

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Restore native grasses as non-native grass fires burn hotter than native grass fires and kill saguaros.

- Eradicate invasive species as they threaten wildlife and create significant wildfire risks where none previously existed within native plant communities.

3.4.1.6 Mineral and Energy Resources

Planning Criteria

Identify exploration and development opportunities and areas for lease, including geothermal resources, saleable, and locatable minerals.

Minerals management will be consistent with FLPMA and existing policy and regulation including the Mining and Minerals Policy Act of 1970, Section 102(a)(12) of FLPMA, the National Materials and Minerals Policy, Research and Development Act of 1980, and current BLM Mineral Resources policy.

Withdrawals from the mining laws may be considered to achieve resource management objectives. Where the plan identifies lands as open to mineral leasing, it also will define any constraints to surface use.

Issues Overview

There were many comments that were opposed to mining. These comments generally were from those that were also opposed to livestock grazing, OHV use, power lines, etc. and that favored preservation and/or low impact uses of the area. In addition, there were a few commenters opposed to other forms of mineral/energy resource development such as gas, oil, etc. There were fewer comments that supported mining. Some of the comments that supported mining suggested that there should be means to reclaim mining sites. There also were comments about the economic contributions of mining (see Section 3.4.1.14). One comment suggested acquiring lands with split mineral estate to improve land management capabilities (see also Section 3.4.1.7). There was support for continued surface mineral collection/recreational rockhounding. One commenter suggested pursuing solar energy development.

Representative Comments

“Mining should be allowed to continue on a limited basis, but if approved, a trust fund should be made as part of the lease to ensure that after mining activities have ceased, the area is returned to its natural state.”
– Individual, Laveen, Arizona

“Please do not allow mining” – Individual, Apache Junction, Arizona

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.”
– Individual, Phoenix, Arizona

“No drilling for oil, gas or water” – Individual, Apache Junction

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Prohibit exploration/drilling for minerals, gas, oil, etc.
- Mining and grazing contribute to Federal receipts and help reduce the financial burden of management.
- Prohibit mining.

- Give high priority to surface mineral harvesting.
- Provide for the establishment solar energy collectors.
- Consider acquiring areas of split estate because lack of subsurface rights impairs BLM's ability to manage the land.
- Mining and preservation are inconsistent.
- Do not grant new mineral leases

BLM Management Concerns

Concerns regarding mineral and energy resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish reclamation goals for mining disturbance that stabilize the site and conform with designated past mining land uses and established land use objectives.
- Determine policy for management of split-estate lands, particularly where BLM manages the surface but the subsurface is in non-Federal ownership.
- Consider general requirements for protecting resource values of the public lands, including stipulations and construction and/or operating standards to apply to surface disturbing activities.

Issues That Will Not Be Addressed

- It is inappropriate that hardrock mining on BLM-administered public land is governed by such outdated laws such as the General Mining Law of 1872.

Rationale: The RMP/EIS process is intended to comply with existing laws, regulations, and policies. The RMP/EIS will outline this regulatory framework, including laws, guidelines, and policies that go beyond the provisions of the General Mining Law of 1872. The intent of the RMP/EIS process is to develop a plan within current guidelines, not to change the regulatory framework.

3.4.1.7 Lands and Realty

3.4.1.7.1 Land Tenure Adjustment and Withdrawal

Planning Criteria

Public lands will be retained in public ownership unless determined that disposal of a particular parcel(s) will serve the public interest. Decisions to acquire lands will be based on public benefits, management considerations, and public access needs. Land tenure adjustments are made through both acquisitions and disposals. Land tenure adjustments may include only the surface, only the mineral estate, or both. Acquisitions may occur by land purchase, donation, exchange, or transfer of jurisdiction from another Federal agency. Disposals occur by sale, exchange, transfer of jurisdiction to another Federal agency, or by infrequent sales or transfers under legal authorities. All land tenure adjustments will consider the effect on the mineral estate.

Conditions will be identified that warrant the removal or withdrawal of certain public lands from multiple use, such as for public safety or protection of special uses and resources. Withdrawals designate public lands for a particular project, purpose or use. Normally, the land is closed to entry under all or some of the public land laws including the mining law. Criteria for identifying lands available or not available for land entry, including under the Desert Land Entry Act, will be developed.

Issues Overview

The comments received on land tenure adjustments promoted two goals—adjustments that would protect BLM managed lands and resources from encroachment by incompatible adjacent land uses and adjustments that would consolidate BLM lands by eliminating inholdings and fragmented ownership. The commenters urged the BLM to retain public land holdings, use land exchanges, land acquisition, or conservation easements, as necessary, to accomplish these goals for the purposes of deterring urban sprawl or other land uses in order to protect the integrity of public lands.

Representative Comments

“I hope that the BLM will adopt a policy that allows for careful impact consideration before any land holdings are sold or released in the future.” – Individual, Colondale, Arizona

“Will the fragmented ownership be identified as properties eligible for land exchange?” – Individual, Phoenix, Arizona

“For land acquisition, BLM should look at obtaining, through exchange, inholdings in areas primarily managed by BLM. Areas of split estate should also be examined for acquisition, since lack of subsurface rights impairs BLM's ability to manage the land.” – Yuma Audubon Society

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Prevent urban encroachment.
- Do not exchange adjacent lands so that they may be developed and add to the urban sprawl.
- Purchase or at least buy conservation easements on any SDNM inholdings or critical adjoining lands.
- Obtain, through exchange, inholdings in areas of land that are primarily managed by BLM.
- Determine whether it is necessary to acquire inholdings in order to protect the integrity of certain areas, such as wildlife corridors and linkages between wilderness areas.
- Will the fragmented ownership be identified as properties eligible for land exchange?
- What is going to happen to the Hia C'ed O'odham homesites at Darby Wells? If these lands are sold it should be to Indian owners.
- Consider a requested Federal/private land exchanges for 120 acres, more or less, located in Township 1 South, Range 2 West; Gila & Salt River Meridian; Section 3: S1/2SW1/4; SW1/4SE1/4. Amend the Area Plan to categorize these Federal land as suitable for exchange.
- Sell off BLM holdings only as an absolute last resort.
- Consider acquiring areas of split estate because lack of subsurface rights impairs BLM's ability to manage the land.
- Do not transfer management of the Ajo airport parcel as requested by the Tohono O'odham Nation; opposed to this based on the analysis of the Barry M. Goldwater Range Non-Renewed Parcels Study.

BLM Management Concerns

Concerns regarding land tenure adjustment and withdrawal to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- BLM will identify lands that will be retained in federal ownership for split estate and lands that will be made available for disposal.
- BLM will provide guidance for future management of land tenure issues.
- Decisions to acquire lands will be based on management considerations to include public needs. BLM will provide for public participation for land tenure decisions.
- Land acquisition issues, such as in-holdings and adjacent lands, will be addressed during the planning effort.

Issues That Will Not Be Addressed

- Use zoning laws to establish a balance between property rights and conservation of natural resources.

Rationale: The BLM does not have purview over zoning laws. Rather, local and county governments are responsible for establishing zoning laws and controlling land use through zoning. However, the potential for acquisition, disposal, and exchange of public lands to have indirect impacts on zoning and development will be considered in the EIS.

- Allow renewal of the lease for the BLM land bound by Mountain View Road on the east, Goldfield Road on the west, and U.S. 60 on the north near Apache Junction.

Rationale: The land specified in this comment is under a variety of withdrawals, leases, and permits, including a Recreation and Public Purposes lease to the City of Apache Junction for equestrian and other recreational activities. The Recreation and Public Purposes lease will remain in effect for the duration of the lease and would not be affected by the RMP.

3.4.1.7.2 Corridors, Communications Sites, and Renewable Energy Sites

Planning Criteria

Existing corridors and communication sites from previous plans may be modified, removed, or carried forward. Additional corridors and communication sites, and new renewable energy sites, including wind and solar energy, will be considered based on established criteria, procedures, and policy, in association with industry demand and resource protection objectives. New locations for corridors, communication sites, and renewable energy sites will also consider environmental quality, economic efficiency, security, safety, and good engineering and technological practices. Decisions will consider preferred locations and exclusion areas to protect significant resource values.

Issues Overview

A number of comments were received regarding utility corridors, and a few comments were received regarding renewable energy (solar energy) sites. Utility corridor comments received from the energy generating and transmission industries urged the BLM to consider the importance of providing additional utility corridors to meet growing demands for electrical energy requirements in Arizona. Commenters that are opposed to the new transmission corridors urged the BLM, in general, to consolidate requests for new transmission lines within existing utility corridors and not to grant rights-of-way for new corridors. One exception to the opposition to new corridors was a proposal that new transmission lines be accommodated within corridors established within 400 feet of each side of highways.

Representative Comments

“APS has a vast electric infrastructure and due to our large service territory we have a number of existing and planned electric transmission lines in the Phoenix South and SDNM planning areas. These existing

facilities are a very important component of our electric infrastructure serving local customers and the Phoenix Metropolitan area. It is extremely important that these facilities be allowed to remain and continue to serve their respective customer loads.” – APS

“CAWCD expects that either its aqueduct or transmission ROW or both will appear as transmission routing options as other transmission operators seeks to accommodate customer growth in their respective service areas.” – Central Arizona Project

“Please keep out the threats of powerlines in the SDNM and PS.” – Individual, Rochester, Michigan

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.”
– Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Work with the Central Arizona Water Conservation District and Central Arizona Transmission Expansion Planning group for transmission expansion/planning activities. The Central Arizona Water Conservation District is studying the feasibility of adding transmission lines within the Phoenix South Planning Area.
- Include future extra-high-voltage transmission lines that Central Arizona Transmission Expansion Planning has been working as a participant with the Central Arizona Transmission Study Committee to coordinate plans. They are a necessary part of the future electric service to areas adjacent to the Phoenix South planning area boundary.
- Do not grant new corridors.
- Do not allow power line development.
- Consider designating utility corridors for existing and future electric transmission facilities in the planning area.
- Create a 400-foot buffer on each side of highways to accommodate future needs.
- Allow APS’ electric infrastructure to remain and continue to serve their respective customer loads.
- Consider APS’ additional proposed transmission facilities planned in the Phoenix South and SDNM study areas that have not been sited. These proposed facilities and others not in the RMP planning area are identified in our Ten-Year Plan filing to the Arizona Corporation Commission as required by State Statute.
- Provide for the establishment of solar energy collectors.

BLM Management Concerns

Concerns regarding corridors, communication sites, and renewable energy sites to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Examine the locations of the right-of-way corridors identified in the Lower Gila South RMP/EIS.
- Take the appropriate steps to ensure proper coordination with the public to identify current uses of existing transportation and utility corridors, and examine additional areas.
- Evaluate a variety of routes and lands identified for transportation and utility corridors, to limit impact on protected resources.

- For right-of-way corridors, consider the following:
 - Types of right-of-way facilities to be allowed
 - Right-of-way activities to be allowed or restricted
 - Non-right-of-way activities to be allowed, restricted, or prohibited within the proposed Right-of-way Corridor or Right-of-way Use Area
 - Non-standard or administrative (i.e., resource protection) terms and conditions to be applied to specific right-of-way facilities that may be subsequently located within the Right-of-way Corridor or Right-of-way Use Area
 - Ancillary facilities and “perpendicular” access needed to efficiently gain access to the Right-of-way Corridor or Right-of-way Use Area
- Address the population growth and identify current and future needs for industry to supply appropriate resources.
- Consider communication site locations, taking into account resource management objectives. Evaluate the potential for renewable energy sites.
- Locations of utility corridors will be coordinated within the state and regionally.

Issues That Will Not Be Addressed

- Do not use the Palo Verde-Devers route as a utility corridor if it would result in building any more power lines or pipelines through the Kofa National Wildlife Refuge.
Rationale: The Kofa National Wildlife Refuge is outside of the Phoenix South Planning Area and the refuge is administered by the USFWS.

3.4.1.8 Recreation

Planning Criteria

A range of landscape settings and associated recreation opportunities will be provided that contribute to meeting projected recreation demand within the planning area.

Recreation management objectives will be defined based on recreational opportunities and compatibility with other resource management objectives, including Arizona Standards for Rangeland Health.

Public lands will be identified as being within either special recreation management areas or extensive recreation management areas.

Provide a range of developed and dispersed recreation experiences, including both motorized and nonmotorized recreation opportunities.

3.4.1.8.1 General Recreation

Issues Overview

People reported that they enjoy a wide variety of activities in the planning area and the most frequently mentioned activities were hiking, hunting, sight seeing, camping, and observing wildlife. The comments regarding general recreation paralleled this diversity of recreational interests. Many of the comments overlapped with the transportation/access issues, particularly with regard to motorized vehicle use (see Section 3.4.1.11). Some comments advocated the development of non-motorized recreational opportunities. The comments also were often intermixed with the topics of camping and recreational shooting, which are addressed in separate subsections below. A large proportion of comments expressed

interest in a particular type of recreational activity and the continued opportunity for that activity. There also were many who expressed concern for the management of certain types of recreation to minimize environmental impacts. Several commenters advocated for dispersed recreation, while others advocated for the development of various types of recreational services (interpretive sites, restrooms, recreational vehicles (RV) areas, equestrian facilities, etc.)

Some comments advocated recreation services, such as permitting and user facilities, while others were against such services/facilities. There were many who commented that there should be increased education about acceptable uses and prohibited activities. Many commenters supported hunting in the Phoenix South Planning Area. There were several comments about the need to consider and manage non-motorized trails for hiking and equestrian purposes.

Representative Comments

“The best aspect of the BLM lands is that they provide for active use by citizens; rockhounding, prospecting, off-roading, hunting, etc. I hope that the BLM will continue to support the traditional uses of the land to the maximum extent feasible. By ‘feasible’ I mean to a point where the physical environment remains substantially undegraded, wildlife habitat is preserved, and important archaeological sites retained intact. With increasing human populations nearby, this may ultimately require that activities in some areas be curtailed or eliminated outright. In the event that certain activities must be halted, I hope that BLM will make every effort to establish additional sites for these activities in other appropriate locations.” – Individual, Glendale, Arizona

“In fairness, certain less-sensitive areas should be set aside for hunting, fishing, and off-road activity, providing all such activities are closely regulated.” – Individual, Phoenix, Arizona

“The RMP/EIS should identify and attend to the potential problems of increased visitation. We are not advocating a decrease in the use of public lands but rather a mechanism that will allow for offsetting mitigation and conservation measures should a problem or concern arise.” – Arizona Desert Bighorn Sheep Society

“The natural and varied geological terrain offers both educational and recreational opportunities for future generations of citizens.” – WTCC, Inc.

“Activities or uses in the Phx South should be those of low impact recreation and education.”
– Individual, Surprise, Arizona

“Develop informational kiosks displaying information about acceptable uses and prohibited activities. Leave No Trace information should be available as well.” – Arizona Wilderness Coalition

“I would like to see [these areas] managed in a balanced and responsible way, so that all people can continue to enjoy the public lands from OHVers to horse riders, hikers and mountain bikers.” – Arizona ATV Riders

“We also urge BLM to end hunting on its lands, preferably the entire Phoenix South area, but at least in SDNM. Hunters kill the healthiest individuals whereas predators kill sick or weak individuals. It is obvious which strategy improves the health of prey populations.” – Escalante Wilderness Project

“I think that outdoorsmen who wish to hunt this area should be welcomed. As a hunter myself, it has been my experience that Arizona's hunting community is both numerous and generally conscientious with respect to land use.” – Individual, Tempe, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Provide opportunities to ride horses.
- Promote dispersed recreation.
- Address the potential problems that could arise from increased visitation.
- Recognize that all recreationists need to share the lands.
- Continue to support traditional recreational uses to the extent feasible.
- Take advantage of educational and recreational opportunities.
- Identify recreation opportunities such as birding at Gillespie Dam and Painted Rock Reservoir.
- Establish specific use areas in the Phoenix South Planning Area (i.e., motorcycle and quads, hunting, walking paths, camping sites, RV areas, overnight places).
- Allow low-impact recreational uses in the Phoenix South Planning Area. Issue special use permits.
- Develop recreational facilities.
- Continue to allow hunting.
- Do not allow hunting (BLM will coordinate with AGFD, which has management authority for wildlife, including hunting).
- Maintain a system with various types of trails to accommodate the different types of uses such as OHV, equestrian, hikers, etc.
- Provide equestrian trails.

BLM Management Concerns

Concerns regarding recreation to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Examine visitor use to determine how best to manage the consumptive uses of visitors while protecting the resources within the planning area.
- Consider guidelines for what is permissible in areas where vehicles are prohibited from driving off of established routes, particularly with regard to pulling off the road to camp or otherwise park vehicles.
- Designate routes as open, closed, or limited.
- Examine ways to minimize potential conflicts between motorized and non-motorized recreational users.
- Consider limits of acceptable change and associated management decisions for sensitive areas that receive heavy use.
- Consider the need for use limits in heavy use areas.
- Identify and manage for public safety and resource protection issues at historic mine sites, which often are popular visitor destinations.
- Consider management of commercial recreational uses, special recreation permits, and other organized events.
- Address large-group camping and large-group recreational use.

3.4.1.8.2 Camping

Issues Overview

There were comments in support of dispersed, primitive-type camping as well as comments in support of having more developed camping with services and facilities. There were more comments supporting dispersed recreational camping and few services and some negative comments about the impacts of roadside, large group, and RV camping areas.

Representative Comments

“Campgrounds and camp facilities should be available, and although ‘primitive’ could be the byword for the 19 year old zealot crowd there are older folks who would also like to use this ground and may prefer to bring in appropriate and comfortable camping equipment. Most of our older generation have earned the right to use Federal land by their actions and not just their words.” – Individual, Oro Valley, Arizona

“Activities: Long term and intermittent camping by jeep or tent campers, RV campers, and in the wilderness areas back packers” – Individual, Why, Arizona

“I prefer open-camping management, no designated camping areas.” – Wildlands Restoration

“Restrict areas for RV camping” – Individual, Ajo, Arizona

“I recommend that primitive camp sites be designated in the monument. Fully developed campsites for the motorhomes, trailers, etc. should be developed OUTSIDE the monument. Let campers bring in their own water. Allow only propane, etc. stoves.” – Individual, Tucson, Arizona

“There is a great pressure for campers, snowbirds and mobile homes in winter to use any open road for establishing a campsite. I recommend the plan close some of these overused open roads in order to control and reduce the impacts to landscapes. Large parties of campers impact the lands S. of I-8 along Courthouse Rock Road.” – Friends of Arizona Rivers

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Manage for primitive, dispersed camping.
- Control/limit RV camping.
- Require campers to bring in their own water.
- Document the baseline condition of dead and downed wood, and address the impact of wood gathering. In this limited rainfall area, woody vegetation grows very slowly and is severely impacted by wood gathering near campsites.
- Allow only propane stoves.
- Ban not only wood gathering, but all campfires on lands in Phoenix South.
- Designate primitive campsites in the monument; fully developed campsites for motor homes, trailers, etc. should be developed outside the monument.
- Establish developed campsites for older visitors.

BLM Management Concerns

Concerns regarding camping to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider whether established camping areas are needed on public land, options may include long- or short-term visitor areas.
- Address large-group camping and large-group recreational uses.
- Consider a strategy to address increasing dispersed camping, including cluster camping, loss of native vegetation, and sanitary concerns.

Issues That Can Be Addressed Administratively

- Develop a system of informing people where acceptable spots for dispersed primitive camping are. Limit the use of Karsonites as they can take away from the primitive experience.

3.4.1.8.3 Recreational Shooting

Issues Overview

Recreational shooting is meant to describe target-shooting activities as opposed to hunting for game species. There are two general types of recreational shooting—dispersed target shooting by individuals or small groups of individuals using sporting firearms and organized shoots by large groups in a concentrated location using a wide variety of firearms, which may include fully automatic weapons. Some people indicated that they enjoy recreational shooting within the planning area, but there also were several comments opposing recreational shooting due to its resource impacts as well as noise and public safety concerns. One commenter noted impacts to saguaro resulting from recreational shooting.

Representative Comments

“[N]o target shooting and no carrying of weapons on public lands.” – Individual, Apache Junction, Arizona

“Target shooting (but not hunting) needs to be phased out due to damage to resources, intrusion on other recreationists because of noise or danger, and population growth. (Shooters have many established shooting ranges available.)” – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Eliminate recreational shooting.
- Evaluate the limitations/restrictions on the carrying of weapons on public lands (within BLM authority).
- Address how recreational shooting has impacted saguaros.

BLM Management Concerns

Concerns regarding recreational shooting to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping) are as follows:

- Address target shooting, particularly in areas of heavy use where public safety may be an issue and where significant resource damage is occurring.
- Evaluate areas in the planning area where target shooting is appropriate.
- Address large-group recreational uses.

3.4.1.9 Special Area Designations

Planning Criteria

The BLM will review, through this planning process, lands within the planning area that may possess remote or primitive characteristics. Consistent with BLM policy, the Secretary of the Interior letter to Senator Robert Bennett (dated April 11, 2003), and the settlement in the case of Utah v. Norton (dated April 14, 2003), BLM has the authority to discuss and incorporate wilderness values into the land use plan, in accordance with the public process incorporated in all land use planning efforts. Thus, BLM is committed to listening to public input through the land use planning process and, where appropriate, managing specified areas of land for wilderness values. However, BLM has no authority to establish new wilderness study areas (WSAs) or to report such areas to Congress. BLM can protect areas in their natural state using a wide range of land use tools other than the WSA designation process.

Current Congressionally designated wilderness areas will be managed according to the 1990 Arizona Desert Wilderness Act, the Wilderness Act regulations for wilderness management at 43 CFR 6300, interim management plans for wildlife and fire management in wilderness, and applicable Wilderness Management Plans. The RMPs will not address reducing or eliminating existing wilderness areas, nor will the RMPs address changing existing boundaries or allowing mechanized or motorized access in any area within them.

Special areas on public lands include wildernesses, WSAs, ACECs, national trails, wild and scenic rivers, national conservation areas, and backcountry byways. Special areas that may be considered in this plan include ACECs, national trails, national conservation areas, and backcountry byways as consistent with federal law as well as policies and procedures. Management requirements for designated special areas will be identified in the plan.

Issues Overview

New WSAs were proposed by citizen groups or individuals in the following 16 areas: Sentinel Plain, Saddle Mountain and Palo Verde Hills, Cortez Peak, Pozo Redondo Mountains, Gila Bend Mountains, Face Mountain, Batamote Mountains, Cuerda de Lena Wash, Yellow Medicine Butte, Oatman Mountains, Saucedo Peak, Black Mountain, and land adjacent to Cabeza Prieta National Wildlife Refuge and Organ Pipe Cactus National Monument. The Sierra Club/Arizona Wilderness Coalition form letter urged the designation of 16 new WSAs, which would cumulatively total approximately 250,000 acres, in the Phoenix South Planning Area. A separate form letter promoted the initiation of a WSA for Saddle Mountain to protect local archaeological resources and to acknowledge the value of the area for its accessibility and close proximity to western Maricopa County. Some commenters expressed the need to protect existing wilderness areas from incompatible adjacent land uses. The Sierra Estrella Wilderness was specifically cited in this regard as being vulnerable to urban sprawl. Other commenters felt that there is an abundance of existing wilderness, national monuments, wildlife refuges, and other restricted access lands in the region and were opposed to the additional wilderness designations.

A number of commenters expressed the belief that some of the same areas within the Phoenix South Planning Area that others felt should be designated as wilderness would be best managed and protected if designated as an ACEC. One comment called for the creation of a greenbelt area to surround Ajo to

buffer residents from the effects of nearby OHV use and hunting. An opposing comment stated that no additional parks or refuges under any name were needed in the Ajo vicinity and that the BLM should instead designate an Ajo Multi-Use Special Management Area.

Representative Comments

“Who knows what scientific significance preserving this desert wilderness may have, but I'm sure it's beneficial to the circle of life.” _ Individual, unspecified community

“There is far and away more wilderness in Arizona than is necessary. The contemplation of creating more is nonsense. This is public land and the public must have a right to continue to use it; in limited ways, perhaps, but not so limited as to effectively bar its use.” – Individual, Oro Valley, AZ

“We do not favor creation or study of any new wilderness areas in the planning units.” – Northern Arizona Chapter of Safari Club International

“I request that BLM designate Saddle Mountain as a Wilderness Study Area. It is important to protect this area to preserve archaeological sites, protect the bighorn sheep population, provide solitude for recreation, and protect plant and animal life.” – Individual, Tonopah, Arizona

“We would certainly like to see what types of protection could be given Saddle Mountain through alternative uses or measures rather than as a Wilderness Area.” – Tonopah Valley Association

“No more wilderness areas. If there is a wilderness criteria, look at a back country by-way in lieu of complete closure to all OHV's” – Individual, Gilbert, Arizona

“Living directly across from BLM land we are concerned about the horrible destruction by vehicles driving off road -- drinking and leaving trash behind. Hunting occurs only hundreds of yards away. Dust from ATV and 4-wheel use accessing these lands covers our home and property. We would like to see a green belt formed in the areas surrounding the borders of Ajo.” Individual, Ajo, Arizona

“We would like to see the areas of Saddle Mountain and Palo Verde Hills be given the highest protection possible so that we will be able to share this special area with future generations. We would like to see Wilderness Study area for the core and ACEC for the buffer areas.” – Friends of Saddle Mountain

“BLM should consider establishing ACEC's for protection of the Gila River channel and its riparian vegetation and for Sonoran Pronghorn and organ pipe cactus habitat in the Ajo-Why area. However, ACEC's should not be used as a substitute for wilderness designation when an area otherwise meets the criteria for wilderness.” – Yuma Audubon Society

“All habitat for Desert Bighorn and Desert Tortoise and all T&E species should be protected as ACECs to insure protection of these species habitat.” – Individual, unspecified community

“All habitat for Desert Bighorn and Desert Tortoise and all T&E species should be protected as ACECs to insure protection of these species habitat.”

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Ensure that wilderness designation is effective in protecting wilderness areas; the Sierra Estrella Wilderness appears vulnerable to impacts from adjoining private lands, particularly when future urban sprawl is considered.
- Consider that too many "off limits" areas (such as wilderness, buffers, etc.) can destroy multiple use concepts and opportunities.
- Recognize and protect outstanding wilderness resources.
- Do not study any more wilderness areas in the planning unit.
- Designate the Saddle Mountain area as an ACEC for its biological value as a lambing area for desert bighorn sheep. Include the Palo Verde Hills as a buffer area.
- Consider establishing ACECs for protection of the Gila River channel and its riparian vegetation and for Sonoran Pronghorn and organ pipe cactus habitat in the Ajo-Why area.
- Protect the Saddle Mountain and Palo Verde Hills region for their prehistoric values and cultural significance.
- Designate an "Ajo Multi-use Special Management" area for the resources controlled by the BLM in and around Ajo; we do not need any more "parks," "refuges," etc. under any other name in this area.
- Create a greenbelt in the area surrounding Ajo and do not allow OHV use or hunting in the area.
- Consider backcountry byway designations.
- Evaluate ACECs for protection of desert bighorn sheep, desert tortoise, and all threatened and endangered species.
- Establish ACECs to protect habitat for sensitive and special status species.

BLM Management Concerns

Recognize the unroaded qualities and other resource values of the following areas: Sentinel Plain, Saddle Mountain and Palo Verde Hills, Gila Bend Mountains, and other areas identified in public comments as potential WSAs.

Issues That Will Not Be Addressed

- Make the Sentinel Plain and Gila Bend Mountains region a WSA.
- Designate Saddle Mountain and Palo Verde Hills as WSAs.
- Support the 14 potential WSAs, totaling 239,667 acres, in Phoenix South.
- Designate 16 potential WSAs, totaling 250,000 acres, in the Phoenix South Planning Area.
- Protect the Sentinel Plains and Saddle Mountain areas as WSAs.
- Do not establish any additional wilderness or WSAs.

ACECs should not be used as a substitute for wilderness designation when an area otherwise meets the criteria for wilderness.

Rationale: In accordance with a stipulation and settlement in the case of the *State of Utah; Utah School and Institutional Trust Lands Administration; and Utah vs. Gale Norton, Secretary of the Interior* in the United States District Court District of Utah, Central Division, the Department of the Interior acknowledged that the authority of the BLM to conduct wilderness reviews, including

the establishment of new WSAs, expired no later than October 2, 1993. Thus, BLM is without authority to propose or establish WSAs.

3.4.1.10 Visual Resources

Planning Criteria

A Visual Resource Management (VRM) classification will be conducted to address the public's concerns about open space and natural vistas. Some areas may be subject to special measures to protect resources or reduce conflicts among uses.

Issues Overview

There were many comments that attested to the beauty of the land and the value of scenic views/open space. Fewer comments addressed specific concerns for the protection of visual resources such as general development/urban sprawl, impacts of recreational use (in particular, off-road vehicle [ORV] use), and development of power lines.

Representative Comments

“As urban sprawl spreads out of control from Phoenix and elsewhere, I value the open space and undeveloped nature of our public lands.” – Individual, Tucson, Arizona

“We are a group of local citizens who cherish these areas. We think it is the most beautiful area in Arizona. We may be partial because it is in our backyards.” – Friends of Saddle Mountain

“There are other areas the ATVs could use without polluting our view with noise, dust, and dead plants.” – Individual, Ajo, Arizona

“It is hard to tell for sure, but it appears that the planning area includes the Gila Bend, Maricopa, and Eagletail Mountains, along with the Palomas Plain and Table Top Wilderness area. In my humble opinion, this huge expanse of land is beautiful... The vast tracts of land represent what our state used to be; sparsely populated with clear skies to gaze upon the stars and mostly unsullied by roads and houses. Scanning the horizon and seeing nothing more than mesquite, ocotillo's, and scrub cleanses the heart and soul like nothing else.” – Individual, Chandler, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Protect the natural beauty of the land; do not develop the very things that make this area beautiful and unique.
- Protect the area from vandals (e.g., people have smashed boulders to gain access with trucks and ATVs, chipped off the Indian art and hauled it away, used paint balls, shot down saguaro cactus, etc.).
- Do not let power line construction ruin the scenic views in this area.
- Prohibit off-road vehicle use, which damages views by creating dust and killing vegetation.

3.4.1.11 Transportation and Access

Planning Criteria

The plan will include transportation and access needs for motorized and non-motorized uses.

Based upon Executive Order 11644 and subsequent regulations in 43 CFR 8340, all public lands will be designated as open, limited, or closed to motorized vehicles.

The plans may designate a network of vehicle routes. Public safety, resource protection, current and future user access needs and conflict resolution will be considered in making these decisions. The BLM route inventory will provide a basis for considering route management.

3.4.1.11.1 General Access

Issues Overview

There were many comments regarding access to public lands. Those that were general in nature are addressed here. Because a large number of comments on this resource category specifically addressed motorized vehicle use and road management, these are addressed under separate topic headings below. Comments on non-motorized trails are addressed under the topic of recreation, Section 3.4.1.8. Comments specific to access for Native Americans is addressed under the topic of Native American issues, Section 3.4.1.17. The majority of comments regarding general access to public lands in the Phoenix South Planning Area were in favor of continued access and/or concerned that there may be additional limitations or restrictions imposed on their access to public lands. There were many who noted that the public's access to much of the land in the planning area is restricted because the lands are designated wilderness, national park, national wildlife refuge, military reservation, etc. This was particularly true of commenters from the Ajo area and/or comments specifically regarding the Ajo area. There were some who noted that there should be consideration to provide adequate access for those who are unable to walk long distances. There were others that were specifically interested in access for wildlife management, for scientific/research purposes, by Native Americans, and to private property. General access concerns were also often noted in those comments that principally regarded the designation of special management areas (particularly wilderness), with those in favor of special management designations also in favor of general access restrictions and those opposed to special management designations also opposed to any restrictions to general access.

Representative Comments

“There is too little access to public lands in these area. A lot of people are unable to walk very far, and are being denied access to public lands because of this reason.” – Individual, Maricopa, Arizona

“Hunters, herpetologists, photographers, trekkers, etc., should be allowed to continue to have free and unfettered access.” – Individual, Oro Valley, Arizona

“Keep the desert available only to the birds, and animals willing to brave it on foot. There is no God-given right to total access anywhere on the planet. This area does not have to be the first.” – Individual, Ajo, Arizona

“Allowing people to have access to and freedom to engage in a number of activities are an important component of BLM stewardship.” – Individual, Colondale, Arizona

“Value: The fact that there are public lands, the public should be allowed to access them as they are now.”
– Individual, Yuma, Arizona

“Access, especially in wilderness areas, is sometimes a problem.” – Individual, Mesa, Arizona

“There are so few areas where usage is not restricted or curtailed that one feels that freedom of movement is almost a thing of the past. This is particularly true here in Ajo where we are surrounded by a gunnery range, wildlife refuge, Indian reservation and a national monument. After all these are ‘public lands’.” – Individual, Ajo, Arizona

“Primary concern is that the establishment of SDNM and development of a RMP does not compromise, restrict or unnecessarily delay sound wildlife management and conservation activities.” Arizona Desert Bighorn Sheep Society

“The lands provide me an opportunity to experience open space and the natural environment without trespass on private property.” – Individual, Glendale, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Allow adequate access for wildlife management activities.
- Manage for public access and use.
- Do not change, restrict, or curtail public access.
- Maintain public availability to the assets of these public lands.
- Consider access for those who are unable to walk for long distances.
- Restrict/limit/decrease access.
- Address access to private property across public land.

BLM Management Concerns

Concerns regarding general access to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Address access, easements, or rights-of-way across private lands in order to secure access to public lands.

3.4.1.11.2 Motor Vehicle Use

Issues Overview

There were a large number of comments focused on motor vehicle use. Often, but not always, these comments were synonymous with management of the motorized transportation system, which is addressed below under “Road Management.” There were comments from both advocates and critics of certain types of vehicle use (e.g., ATVs, OHVs, ORVs, dune buggies, dirt bikes, etc., generalized here as OHV use since that is the term used by BLM, and RVs/trailers) as well as comments about the type of motorized vehicle use that should be allowed or restricted (e.g., driving in washes, challenge courses, off-road use areas, etc.). Related issues were concerns for the noise generated by of certain types of vehicles and regulation/law enforcement (also see the discussion of law enforcement, Section 3.4.1.13).

The viewpoints offered by the public on this issue fell into two general categories—those that valued OHV use and favored no or minimal further limitations on OHV use and those that expressed concern for the adverse effects of unregulated OHV activities. Many members of the public were of the opinion that OHV use and OHV oriented activities are legitimate recreational uses of public lands and opportunities for this activity should remain as unfettered as possible. Some proposed that off-road use areas should be designated or that motorized vehicle use should be allowed in major washes. A number of commenters requested that the freedom to use OHVs be maximized within the Phoenix South Planning Area outside of SDNM to offset forthcoming limitations on vehicle use that they believe will be imposed within the monument. Those who were concerned about unregulated/unrestricted OHV use did not challenge legitimacy of the use of four-wheel-drive vehicles to gain access to public lands on established roads, but expressed particular concerns about the potential negative environmental impacts of vehicle use (e.g., damage to cultural sites, vehicle tracks, dust, noise, impacts to washes and riparian areas). Some promoted off-road use areas and/or off-road vehicle challenge courses, while others thought that these activities should be excluded or limited within the planning area.

Representative Comments

“The most important thing is dirt bike riding. I like nothing more than exploring this great area on a motorcycle. The BLM should do everything possible to map all the motorcycle trails & design a trail network that is looped & challenging to different riders skill levels. This will probably require building several hundred miles of new trails to keep up with demand.” – Individual, Phoenix, Arizona

“Driving in washes should continue and no vehicle routes in use presently should be closed. The land has stood up well over the past decades without the help of environmental zealots.” – Individual, Oro Valley, Arizona

“We [ATV riders] like to be able to get far back onto the lands and see as much as possible. This is hard to do on foot and many of the roads are too rough and/or narrow for regular vehicle passage.” – Arizona ATV Riders

“Only limited non-motorized travel should be allowed.” – Individual, unspecified community

“Crack down on illegal ORV routes created in the Ajo BLM lands.” – AZ Wilderness Coalition

“I urge you to limit the ORV trails and to limit the areas that are used for ‘extreme courses.’ ”
– Individual, Tonopah, Arizona

“Policing of ATVs and mountain bikers is very important because a few - who destroy areas and cause erosion by going off trails - destroyed it for the many.” – Individual, Buckeye, Arizona

“There are other areas the ATVs could use without polluting our view with noise, dust, and dead plants.”
– Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Provide the public with the freedom to use motorcycles and 4-wheel drive vehicles within the Phoenix South public lands outside of the SDNM to offset vehicle use restrictions within the monument.

- Keep ATVs and 4-wheel drive vehicle use from tearing up cactus and other plants near Ajo (west of Rosedale Avenue).
- Prohibit motorized vehicles in all riparian areas.
- Prohibit driving in washes.
- Allow driving in washes.
- Restrict/regulate OHV use as this use can promote erosion and damage plants and animals.
- Address noise from OHV use, which is prevalent into the night in some areas.
- Do not allow ATVs, RV generators, etc. because of noise.
- Prohibit ATVs and dune buggies.
- Allow ATV use.
- Recognize OHV use as a legitimate use of public lands.
- Establish OHV use areas.
- Limit or exclude OHV off-road use areas and/or off-road vehicle challenge courses.
- Provide additional motorized public access for those who are unable to walk long distances.

BLM Management Concerns

Concerns regarding motor vehicle use to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider how types of vehicle uses, including competitive events, races and challenge courses, should be managed.

Issues That Will Not Be Addressed

- Provide additional motorized public access in wilderness areas for people who are unable to walk long distances.

Rationale: Wilderness areas are designated by Congress and must be managed in accordance with the Wilderness Act of 1964, which expressly prohibits motorized vehicle use as a means of public recreation conveyance. The BLM has no authority to develop new or open old motorized vehicle routes within designated wilderness.

Issues That Can Be Addressed Administratively

- Continue to educate the public about appropriate off-road driving behavior.

3.4.1.11.3 Road Management

Issues Overview

Comments regarded as applicable to the road management topic were those that focused on the transportation network, leaving roads open or closing roads, road maintenance, and the environmental impacts of roads. A frequently offered viewpoint held that existing roads should be kept open for public use and, where necessary, maintained, upgraded, or improved to provide safe and efficient public access. Some commenters were opposed to the creation of new roads and/or believed that unnecessary roads should be closed, particularly if the roads might fragment wildlife habitat or damage archaeological sites or riparian areas. Others emphasized the popularity of OHV-based recreation and called for designating OHV use areas in locations with low wildlife habitat values where this activity could be pursued. Some

comments emphasized that the BLM should increase law enforcement and use public education and other management measures to control off-road vehicle damage rather than resorting to road closures. There were several commenters who expressed interest in being involved in the detail of the road inventory and transportation alternatives planning process.

Representative Comments

“Roads are a necessary evil in that they deface the landscape and disturb wildlife in addition to providing access.” – Individual, Tempe, Arizona

“I am very concerned about the protection of cultural and biological resources and the road system is the management key.” – Individual, Tucson, Arizona

“I agree there may be some areas that need route restrictions, but please lets not close every thing to OHV use. OHV is a legitimate use of public lands.” – Individual, Bakersfield, California

“Continue to educate the public about off road driving but don't punish everyone because of the very, very few who break the rules.” – Individual, Gila Bend, Arizona

“Prevent driving in washes and close and rehabilitate all vehicle routes that threaten cultural and historic sites; fragment wildlife habitat; and damage plants, soils, and riparian areas and watersheds.”
– Individual, Tucson, Arizona

“No off road travel allowed with a detail travel plan and a ‘closed unless signed open’” – Escalante Wilderness Project

“Further, unauthorized ‘roads’ often proliferate due to illegal off-road OHV activity when road regulations are laxly enforced.” – Individual, Tempe, Arizona

“In all areas, ORV's require careful monitoring and limited access to designated routes only. When this cannot be done, they should not be allowed at all.” – Individual, Midland, Texas

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Manage the road system network to protect cultural and biological resources.
- Keep road construction to a minimum.
- Do not create new roads.
- Maintain, upgrade, and improve existing roads to continue to provide the public with the safe and efficient transportation system.
- Existing roads should be made passable.
- Do not overly restrict motorized vehicle access on traditionally used roads, washes, and trails.
- Close unnecessary roads, especially those that lead to archaeological sites or riparian areas, or that fragment wildlife habitat.
- Designate OHV use areas in locations with low wildlife habitat values or where this use is already popular; keep each OHV use area to about 30 acres with twisting and interlaced trails.
- Establish a closed unless signed open policy for roads.

- Emphasize increased law enforcement patrolling and other management measures to control off-road vehicle damage rather than closing roads.
- Adopt a measure for managing the road/vehicle route network available for public use that specifies that a road/vehicle route is closed to public use unless it is specifically marked as open.
- Consider whether closing public road use will produce congestion along remaining roads and road accessible areas.

Issues That Will Not Be Addressed

- Provide or re-open cherry stem access of existing roads in some areas, such as the Cabeza Prieta National Wildlife Refuge.

Rationale: There are no BLM administered public lands within the Cabeza Prieta National Wildlife Refuge so BLM has no authority to address management of the wildlife refuge. However, BLM will address vehicle access and route designation on the public lands in the planning area.

Issues That Can Be Addressed Administratively

- Continue to educate the public about appropriate off-road driving behavior.
- Emphasize increased law enforcement patrolling and other management measures to control ORV damage rather than closing roads.
- Update public use road maps for the planning areas.

3.4.1.12 Airspace

Planning Criteria

The 1990 Arizona Desert Wilderness Act, which established the existing wilderness areas in the SDNM and Phoenix South Planning Area, provided that these wilderness designations were not to interfere with the continuing use of existing military training areas, modification of those military training areas, or the development of new low-level routes needed to support military training missions.

Issues Overview

Only a few comments were received regarding airspace; none of these comments raise an issue that indicates that airspace needs to be addressed through the development of EIS alternatives. The comments indicate that military special use airspace and military training routes are environmental factors that should be taken into consideration in the assessment of the effects of alternatives for special management area designations and other land resource management prescriptions. One comment indicates that the EIS should consider how proposed special management designations could adversely impact military overflights.

Representative Comments

“Showing military airspace on planning maps is vital to your planning efforts for BLM land in Arizona.”
– 355 OSS/OSOA, Davis-Monthan Air Force Base

“BLM should coordinate closely with military agencies to attempt to work out an optimal schedule for overflights so that animal populations are not adversely affected.” – Yuma Audubon Society

“[These areas] should be managed so they do nothing to interfere with operations at Luke AFB. No Wilderness study areas at all, this designation could be used by radical extremist environmentalists to complain about noise who would then want to shutdown flight operations because of noise. Wilderness study areas in this area should be considered anti military & therefore un-American. The property by Gila Bend that the BLM just got from the military under no circumstance should any of it be considered for wilderness (unless worthless land)” – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Identify and consider special use airspace and training routes used by the military.

BLM Management Concerns

Concerns regarding airspace to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider appropriate management of resources and uses relative to overflights, as commercial and private overflights are a growing use of public lands.

Issues That Will Not Be Addressed

- Consider how wilderness designations could adversely impact military overflights.

Rationale: In accordance with a stipulation and settlement in the case of the *State of Utah; Utah School and Institutional Trust Lands Administration; and Utah vs. Gale Norton, Secretary of the Interior* in the United States District Court District of Utah, Central Division, the Department of the Interior acknowledged that the authority of the BLM to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 2, 1993. Thus, BLM has no authority to propose or establish new WSAs and there is no potential for conflicts to emerge between military airspace use and WSA designations.

3.4.1.13 Law Enforcement

3.4.1.13.1 BLM Rangers

Planning Criteria

No issue specific planning criteria have been identified.

Issues Overview

Comments about enforcement of BLM’s policies and regulations for public land regard oversight of recreational use, and OHV use in particular. For the Phoenix South Planning Area, the need for adequate oversight in the Ajo area was noted. There were a number of comments regarding undocumented immigrants and illegal drug smuggling, as detailed below. Some comments assert the perception that some recreational users are littering and that more oversight and law enforcement is needed to reduce this.

Representative Comments

“Policing of ATVs and mountain bikers is very important because a few - who destroy areas and cause erosion by going off trails - destroyed it for the many.” – Individual, Buckeye, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

No public issues that would be used in the development of alternatives were identified for law enforcement.

BLM Management Concerns

Concerns regarding law enforcement to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- When developing resource management objectives, consider the need of an enforcement aspect, including developing appropriate penalties.
- Enforce federal laws and regulations pertaining to use, management, and development of the public lands and their resources. Particularly, evaluate options to effectively enforce vehicle laws.

Issues That Can Be Addressed Administratively

- More law enforcement is needed to address poaching, dumping, cross-country ATV use, etc.
- Have an adequate number of rangers for the number of visitors.
- Some ATV/OHV/recreational shooters/other recreational users generate trash.
- Provide adequate oversight of the BLM land in Ajo.

3.4.1.13.2 Undocumented Immigrants and Drug Smuggling

Planning Criteria

No issue specific planning criteria have been identified for law enforcement regarding undocumented immigrants and drug smuggling.

Issues Overview

These comments address the negative impacts from vehicle tracks, litter, etc. resulting from undocumented immigrant and drug smuggling activity. They also object to the impacts from law enforcement driving cross-country.

Representative Comments

“I object to the restriction of law abiding public being restricted, for whatever reason, and illegal immigrants, law enforcement and administrative travel just tramples these same lands.” – Individual, Ajo, Arizona

“I strongly object to you allowing illegals to cross these lands, destroying resources and leaving their junk scattered on the desert.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Address the trash left behind by undocumented immigrants and drug smugglers.

BLM Management Concerns

Concerns regarding undocumented immigrants and drug smugglers to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Undocumented immigrants and drug smugglers often drive vehicles off of roads, leave behind trash, and burn campfires. This has resulted in management concerns including resource damage (to soils, vegetation, wildlife habitat, cultural resources, etc.), unsanitary human waste disposal, costly clean-up of trash, and the potential for wildfire.
- Safety is another significant management concern. Undocumented immigrants are frequently ill-prepared for the harsh environmental and climatic conditions they encounter, particularly in the summer. This can result in the need for search and rescue operations. Recently, the illegal activities also have resulted in an increased concern for employee and visitor safety.

Issues That Can Be Addressed Administratively

- Address the undocumented immigrants and drug smugglers and their impacts on the land.
- Address impacts of border law enforcement on the land.

3.4.1.14 Socioeconomics

Planning Criteria

The effects of proposed plan decisions will be evaluated for socioeconomic impacts. The impacts of decisions on disadvantaged communities will be evaluated, consistent with BLM's environmental justice policy.

Issues Overview

The comments received on socioeconomics varied widely consistent with the multiple uses that occur within the planning and decision area. The social attitudes and values are evident from the scoping meeting comment worksheet of what respondents listed as features or qualities they value about public lands (see Section 3.3.1). There were many general comments about population growth and the resulting development in the region. There were a number of local residents that noted that they moved to the area because of the desert environment and open space. Others noted the importance of tourism and winter residents to the economies of local communities. Some were opposed to actions that might support additional tourism. Often, these commenters noted the connection between these trends and the recreational opportunities and experience available to these users on BLM-administered public land and/or the impacts of these users on BLM-administered public land. Some noted the economic importance of outdoor recreation.

Several utility companies expressed concern for continued operation and future development. These included Arizona Public Service, Tucson Electric Power, as well as the Central Arizona Transmission Study Committee, and Central Arizona Water Conservation District (the State of Arizona's entity responsible for operating and maintaining and repaying the Federal government for the Central Arizona Project). These comments raised concerns that adjustments to rights-of-way or policy for new corridor developments would have potential negative impacts on utility companies as well as the services provided to the communities they serve. There was also a comment encouraging potential solar energy development in the region.

Economic impacts on adjacent lands and private landholders was raised as a concern and one comment stated that an economic impact analysis is necessary to consider the potential impact on the value of private property. Other comments specifically related to the economic impact of mining and/or livestock grazing. Of these two, there were more comments related to livestock grazing, including that livestock grazing produces income and is a traditional way of life, that BLM grazing fees should be raised, that allotment holders should pay for range improvements, and that the land is marginal and not economically viable for livestock grazing.

Representative Comments

“Wildlife dependent outdoor recreation and associated uses represent a 1.5 billion dollar industry to the State of Arizona.” – Individual, Yuma, Arizona

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.” – Individual, Phoenix, Arizona

“We live in the west because of the abundance of open public lands for us to recreate on. We contribute significantly to local economies to support our pastime.” – Individual, Mesa, Arizona

“I hope you use the term ‘environment’ to mean the human environment and include all the conditions and circumstances that affect the welfare of the human species.” – Individual, Albuquerque, New Mexico

“I hate to see the over-grazing with the damage being done to the soil resource. This is not viable, economic, feasible grazing lands.” – Individual, Ajo, Arizona

“Cattle grazing, while economically marginal, has been a feature of Arizona land use for decades.” – Individual, Tempe, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Recognize how these lands contribute to the social and economic welfare of local residents and benefits help all Americans even those who do not visit there.
- Support wildlife-dependent recreation for its contribution to the economy.
- Examine the income-producing potential for ecotourism including nonconsumptive uses such as birding, nature interpretive hikes, Native history and culture, etc.
- Address how the influx of winter residents has changed social and economic conditions.
- Do not develop for tourism.
- Address potential impacts on utilities.
- Any management plan component that restricts the ability of Tucson Electric Power to construct, operate, and maintain electric facilities must also provide sufficient funds to develop acceptable alternatives for those restrictions.
- Provide for the establishment of solar energy collectors.
- Include a professionally prepared economic impact analysis that considers the impact on the value of private property in and/or near the planning area.
- Recognize that mining and grazing contribute to Federal receipts and help reduce the financial burden of management.
- Livestock grazing is economically marginal, but is a traditional means of making a living.

- Limit range improvements and require the lessee to pay for them.
- Consider the effects of population growth and the resulting development.

BLM Management Concerns

No management concerns to be addressed in the plan for socioeconomics that were not identified by the public or other agencies during scoping.

Issues That Will Not Be Addressed

- Increase grazing fees and use this money to hire more staff to study and protect the land. Grazing fees on BLM land lag far behind what the states charge and are only about 10 percent of what private landowners charge.

Rationale: BLM has no authority to adjust or change the grazing fee; it is set by a formula contained in law, as is the disposition of the fees collected.

3.4.1.15 Public Participation and Education

Planning Criteria

No additional, issue specific plan criteria have been identified.

Issues Overview

Comments about public participation and education generally encouraged the BLM to provide means to incorporate them in the planning process and in management. There were many who correlated the public's compliance with resource protection rules and regulations with the education program, particularly with regard to motorized vehicle travel. The more people are aware of what the regulations and policies are and/or of the impacts of inappropriate uses, the greater the compliance. Many of the comments on this topic pertain to ongoing BLM programs rather than strictly to the RMP/EIS process. There were some requests for providing better mapping of the transportation network to the public and some expressed interest in access to raw road inventory that may be used in the analysis of RMP/EIS alternatives. Another commenter suggested the establishment of committees to assist with the RMP/EIS process and as a means of continued public involvement. There were several comments that pertained to coordination with educational institutions, researchers, and scientists.

Representative Comments

“The Society respectfully requests that a copy of the raw road inventory data performed by the Enterprise Group be provided for our review before being interpreted and summarized. We would gladly pay for the reproduction costs if necessary.” – Arizona Desert Bighorn Sheep Society

“Because inventory is so vital for sound management, perhaps BLM could seek the active participation of citizen volunteers in the process to enable progress during a period of frozen, or perhaps declining budget allocations. The agency has some volunteer opportunities advertised and some experience in this area, so it would seem that efforts to expand activities could be done with low cost (contact interested citizens from the existing mailing lists, interest groups by phone or e-mail for example) and with some real chance of success.” – Individual, Glendale, Arizona

“The natural and varied geological terrain offers both educational and recreational opportunities for future generations of citizens.” – WTCC

“Believe that explicit consideration of archaeological research and public education can only strengthen the planning effort and contribute to the BLMs ability to manage the Monument in the public interest. “
– Society for American Archaeology

“Continue to educate the public about off road driving.” – Individual, Gila Bend, Arizona

“Set up a committee for one of these, very important (the monument would have another set of committees) Set up another committee which oversees these committees. Committees comprised of maybe a rep from BLM, Fish and Game, public governors office, Sierra Club, etc.” – Individual, Casa Grande, Arizona

“Update roads in the area on your maps. It would give public better view of where they live in proximity.” – Individual, Maricopa, Arizona

“With 3 to 4 million people in the central area of the state, many wild lands tend to be invaded. An educational program for schools would help in adverting some of the problems.” – Individual, Phoenix, Arizona

“I would like the BLM to start educating hikers to go to a wilderness area to do their thing; they do nothing but create user conflicts with everyone else.” – Individual, Phoenix Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Consider education/outreach opportunities.
- Consider use of the public lands for scientific purposes and research.

BLM Management Concerns

Concerns regarding public participation and education to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider outreach programs that provide visitor information including public safety, resource protection, and appropriate uses.

Issues That Can Be Addressed Administratively

- Establish various committees to address issues and uses for both the Phoenix South and SDNM.
- Teach those who want to use the land how to co-exist with plant and animal life.
- Do future scoping meetings in a question and answer forum so recreationists, environmentalists, ranchers, miners, etc. participate together and build trust among the groups.
- Consider an educational program for schools addressing how wild lands are being invaded.
- Continue to educate the public about off-road driving.
- Provide for public review of the raw road inventory data prior to interpretation.

3.4.1.16 Cultural Resources

Planning Criteria

Cultural resources will be managed to maintain or enhance significant scientific, educational, cultural heritage, and other public values.

Cultural resources will be conserved and protected for future generations.

Cultural sites that meet National Register criteria will be protected and nominated for inclusion on the register.

Issues Overview

Nearly all of the comments received on cultural resources concerned the need to recognize and protect these resources. Some commenters stressed the importance of giving cultural resource protection high priority. Several comments identified general localities where cultural resource were in need of protection the other comments warned that the locations of cultural resource sites should not be publicized because of the potential for theft or vandalism. Protection and repair of historic cultural resource sites also received support from some commenters as a high priority management need.

Representative Comments

“Because of their vulnerability and sensitivity to vandalism, first consideration for inventory efforts and highest priority for protection must be assigned to archaeological sites and resources.” – Individual, Glendale, Arizona

“Preserve historical sites.” – Individual, Plymouth, Michigan

“Southern Arizona is losing its natural heritage. It is important to protect what we have.” – Individual, Tucson, Arizona

“I would like to see the cultural resources honored and preserved.” – Individual, Oakland, California

“Most native American sites should not be marked or publicized for their protection while the Butterfield Trail and the Mormon Battalion Trail and other historical sites should be marked with interpretive signs.” – Individual, Laveen, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Protect the Saddle Mountain and Palo Verde Hills region for their prehistoric values and cultural significance.
- Recognize and protect the cultural resource values in the region below Gillespie Dam.
- Give priority to archaeological site protection because of their vulnerability and sensitivity to vandalism.
- Give high priority to repairing historical sites and protecting pre-historic sites.
- Maintain ancient cultural characteristics.
- Inventory and protect petroglyphs and historic pioneer sites.
- Preserve Native American cultural resources and life ways.

- Protect Butterfield Pass because of its historical value.

BLM Management Concerns

Concerns regarding cultural resources to be addressed in the plan, by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- BLM allocates cultural resources to scientific, traditional, public, experimental, preservation, and other uses. Define how sites or categories of sites are allocated to use categories, both for known sites and for future sites.
- Determine how to effectively manage increasing cultural heritage tourism while protecting cultural resources.

Issues That Can Be Addressed Administratively

- Conduct an inventory to identify, locate, and evaluate cultural resources because without an accurate and complete resource database, even well intentioned actions may prove destructive. Seek citizen volunteers to help with the inventory if BLM's budget cannot accommodate the inventory.
- Do not publicize or mark Native American sites.

3.4.1.17 Native American Issues

Planning Criteria

No additional, issue specific plan criteria have been identified.

Issues Overview

In the comments received, there were requests that the BLM work closely with Native American communities in the development of the RMP for the Phoenix South Planning Area to ensure that their values, sacred sites, and traditional activities are respected. Another comment requests that local tribes be involved in the planning and possibly management of these BLM lands. An opposing comment on this issue indicates that Native American tribes should not be provided with special opportunities for involvement in BLM planning and management. The future of the Hia C'ed O'odham home sites at Darby Wells is of concern and a request was made urging that if these home sites are to be sold that they be sold to Indians. Conversely, other comments urge that management of the Ajo Airport parcel, that was relinquished from the Barry M. Goldwater Range, not be transferred to the Tohono O'odham Nation as requested by the Nation.

Representative Comments

“I think the plan should preserve Native American cultural resources and lifeways” – Individual, Phoenix, Arizona

“Most Native American sites should not be marked or publicized for their protection while the Butterfield Trail and the Mormon Battalion Trail and other historical sites should be marked with interpretive signs.” – Individual, Laveen, Arizona

“I do not encourage use of local tribes in planning and possibly management. The mind set of the Indians we have had to deal with is to bar entry and use of "their" land, except to those able to pay the highest dollar for permits.” – Individual, Oro Valley, Arizona

“Native peoples should have access for traditional uses regardless of other matters.” – Individual, Tucson, Arizona

“Involve local tribes in planning and possibly management.” – Individual, Tucson, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Do not transfer management of the Ajo airport parcel as requested by the Tohono O'odham Nation; opposed to this based on the analysis of the Barry M. Goldwater Range Non-Renewed Parcels Study.
- Consider whether there are potential conflicts between recreational uses and Native American traditional religious and cultural uses.
- Work closely with Native American communities who have prehistoric and historic ties to the area to ensure their values, sacred sites, and traditional activities are respected.
- Involve local tribes in planning and possibly management of BLM lands.

BLM Management Concerns

Concerns regarding Native American issues to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider decisions that will protect areas with traditional cultural significance to Native American tribes.

Issues That Will Not Be Addressed

- Do not involve local tribes in planning and possibly management of BLM lands.
Rationale: The Federal government has a responsibility to consult with Native American tribes on potential decisions and actions on the public lands. In addition, all interested parties, including the tribes, are encouraged to take part in planning for the public lands.

Issues That Can Be Addressed Administratively

- Provide access to Native peoples for traditional uses regardless of other matters.
- What is going to happen to the Hia C'ed O'odham homesites at Darby Wells? If these lands are sold it should be to Indian owners.
- Work closely with Native American communities who have prehistoric and historic ties to the area to ensure their values, sacred sites, and traditional activities are respected.
- Involve local tribes in planning and possibly management of BLM lands.
- Do not involve local tribes in planning and possibly management of BLM lands.

3.4.1.18 Public Health and Safety

Planning Criteria

The plan will develop a framework to protect public health and safety, including addressing hazardous sites and activities; incorporating requirements to meet the Clean Air Act, Clean Water Act, and other environmental laws and regulations; and considering other potential hazards.

The Air Force and BLM are developing a Memorandum of Understanding to address safe disposal of any unexploded ordnance discovered on lands relinquished from the Barry M. Goldwater Range (i.e., Sentinel Plain and property in the vicinity of the Ajo Airport).

Issue Overview

Less than a half dozen comments were received regarding public health and safety issues within the Phoenix South Planning Area. Public health and safety concerns identified include dust and noise generated by ATV use, uncovered abandoned well and mine shafts, poor and unmaintained road conditions, the behavior of some ATV drivers, and target shooting.

Representative Comments

- "Please look closely at the hills to the West of Ajo (between Dorsey and Norton or even Rasmussen streets)—the ATVs have so dug up the hills that they are eroding. Dust is an issue as is noise." – Individual, Ajo, Arizona
- "Old wells and mine shafts need to be covered." – Individual, Ajo, Arizona
- "On going maintenance is required as well as upgrades and operational improvements to continue to provide the public with the safe and efficient transportation system that has been developed with public funding and support." – Individual, unspecified community
- "Although they have a right to use and enjoy them, they should also accept a responsibility not only for safe driving, but for the ecosystems that they are driving over." – Individual, Kern, California
- "Target shooting (but not hunting) needs to be phased out due to damage to resources, intrusion on other recreationists because of noise or danger, and population growth. (Shooters have many established shooting ranges available.)" – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Dust and noise generated by ATV use west of Ajo is a public health issue.
- Uncovered old well and mine shafts are public safety hazard.
- Roads should be maintained, upgraded, and improved as necessary to provide the public with a safe and efficient transportation system.
- ATVs must be driven in a responsible manner so as to not endanger public safety.
- Target shooting is a threat to the safety of nonparticipating visitors.

BLM Management Concerns

Concerns regarding public health and safety to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Identify and consider safety issues at historic mine sites, which are often popular visitor destinations.
- Determine which uses are incompatible due to public safety issues. Target shooting, for example, is a legitimate public lands use but may place nonparticipants at risk, particularly in areas of heavy use.
- Consider the increasing concern regarding undocumented immigrant traffic and smuggling activities on the public lands relative to public and employee safety.
- Consider risk to visitors on the Sentinel Plain parcel acquired from the Goldwater Range from unlocated unexploded ordnance within the acquired parcel or from air-to-ground bombing and gunnery at the still active aviation weapons range (Manned Range 4) on adjacent Goldwater Range lands. Work with the Air Force to consider what management actions are needed to protect public safety both on Sentinel Plain and with regards to access to the Barry M. Goldwater Range.
- Determine what level of maintenance should be provided on roads to maintain access and to protect both public safety and natural and cultural resources.
- Consider the effects of hazardous sites, including those created by illegal dumping, on public health and safety.
- Consider appropriate management of sites and areas that pose a threat to public health and safety, whether man-made or natural.

3.4.2 SONORAN DESERT NATIONAL MONUMENT

3.4.2.1 Soil, Water, and Air Resources

3.4.2.1.1 Soil Resources

Planning Criteria

Proposed decisions will be measured against the Arizona Standard for Rangeland Health Standard 1; upland soils will exhibit infiltration, permeability and erosion rates that are appropriate to soil type, climate, and land form (ecological site) to ensure long-term soil productivity. Best management practices will be incorporated into programs to minimize soil erosion and compaction resulting from management actions.

Issues Overview

There were very few comments that pertained specifically to soil resources. Concerns about impacts to soils, increased erosion, etc. were noted in respect to activities such as OHV use and livestock grazing as well as restoration of closed roads.

Representative Comments

“Restoration of soil and vegetation should also be a priority in the management plan.” – Individual, Davis, California

“[R]epair soil and vegetation on overgrazed parcels.” – Center for Biological Diversity

“I hate to see the over-grazing with the damage being done to the soil resource.” – Individual, Ajo, Arizona

“Restore closed roads by raking soils, removing berms, replanting with appropriate native vegetation and other known successful methods to obliterate visual evidence of any motorized or mechanized travelway.” – Sierra Club Grand Canyon Chapter

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Restore soils impacted by over grazing.
- Rehabilitate roads that have caused increased erosion.

BLM Management Concerns

Concerns regarding soil resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish reclamation goals for disturbed areas that will ensure that soils are stable.
- Identify any watersheds designated by the ADEQ as Category I watersheds and identify decisions or restoration actions that should be considered.

3.4.2.1.2 Water Resources

Planning Criteria

Water Quality - Section 319 of the Clean Water Act obligates Federal agencies to be consistent with State Non-point Source Management Program Plans and relevant water quality standards. Section 313 requires compliance with State Water Quality Standards. BLM will coordinate with ADEQ regarding their TMDL program and other relevant water quality programs. BLM will incorporate applicable best management practices or other conservation measures for specific programs and activities into the RMP. Water quality will be maintained or improved in accordance with State and Federal standards. Proposed decisions within the planning area will be in compliance with the Clean Water Act, Federal and State water quality standards, and BLM/ADEQ agreements.

Water Rights – Where the need for water rights is identified on the public lands, BLM will file for water rights in accordance with State Law and in accordance with the SDNM proclamation. BLM will continue to quantify and notify the State of its Federal reserved water rights in the designated wilderness areas, in accordance with the Arizona Desert Wilderness Act of 1990.

Issues Overview

As with the Phoenix South Planning Area, comments that pertained specifically to water resources primarily promoted protection of the watershed and riparian areas. There were a few comments about protecting surface waters. (Comments regarding wildlife water developments are addressed in Section 3.4.2.2.1 and waters associated with livestock grazing allotments are addressed in Section 3.4.2.3.) There also were some comments about depletion of groundwater resources. The potential impacts on water rights from land disposal, acquisition, or exchange are a concern. There were additional comments on the protection of natural surface water sources in the SDNM as compared to the Phoenix South Planning Area.

Representative Comments

“Watershed is crucial for the maintenance of the ecosystem so streams and riparian areas must be protected as well as ground water preserved.” – Individual, New Orleans, Louisiana

“Natural hydrolytic functions of springs and streams should be restored and/or maintained.” – AGFD

“Protect and restore springs and seeps, for critical wildlife water sources.” – Individual, unspecified community

“BLM should take timely and appropriate steps to protect the water rights associated with the SDNM.” – The Wilderness Society

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Factor in water resources in the development of the management plans.
- Identify any perennial water streams and/or pools.
- Protect streams and riparian areas and preserve groundwater because the watershed is crucial for the maintenance of the ecosystem.
- Protect and restore springs and seeps.
- Restore and/or maintain the natural hydrogeologic functions of springs and streams.
- Protect Vekol Wash.
- Within the SDNM, identify/inventory water sources and file for/protect the associated water rights.

BLM Management Concerns

Concerns regarding water resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Identify any ADEQ-designated Category I watershed and identify decisions or restoration actions that should be considered.

Issues That Will Not Be Addressed

- Restore water to the rivers.

Rationale: The BLM does not control water rights on any of the rivers in the planning area, and its extremely unlikely that any management actions on BLM’s part could accomplish water flow restoration.

3.4.2.1.3 Air Resources

Planning Criteria

Air Quality – Maintain and enhance air quality and visibility in a manner consistent with the Clean Air Act. Under the Clean Air Act, BLM administered lands were given a Class II air quality classification unless reclassified by the State. Wilderness areas and national monuments must be classified as Class I or

Class II. This classification allows moderate deterioration associated with moderate, well-controlled industrial and population growth. Proposed decisions within the influence zone of the planning project that may affect non-attainment areas, including the Maricopa County PM₁₀ non-attainment area, will be assessed for conformance with Air Quality standards.

Issues Overview

Very few comments were received that pertain to air quality. Those that were received pertain to the dust and air pollution that results from driving vehicles.

Representative Comments

“You use your car because there are roads to take you anywhere you like. Our world is designed by us to be that way. But in the wilderness someone scares the environment away and creates air pollution by sitting on their butt and riding out to 'someplace'. I go out in the woods and wilderness to get away from the smog. You're hurting the area you're going in to see and be a part of.” – Individual, Hancock, New Hampshire

“An extensive body of scientific literature documents the adverse impact of off road vehicles on soil, water, vegetation, sensitive habitats, fish and wildlife, public land visitors, and cultural, archeological, and historical resources. Off-road vehicles are also significant sources of air, water, and noise pollution.”
– Natural Trails & Waters Coalition

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Consider the effects of ORVs, including air pollution.
- Driving vehicles to the wilderness creates air pollution and defeats the value of going to the wilderness to get away from the smog.

BLM Management Concerns

Concerns regarding air resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider the effect of public uses on air quality, particularly the use of dirt roads with regard to PM₁₀ non-attainment areas.
- Consider the effect of air quality on the monument resources, including monument viewsheds.
- Consider whether to recommend a change in the Air Quality Class to the State.

3.4.2.2 Biological Resources

3.4.2.2.1 Vegetation, Invasive Species, Wildlife Habitat, and Wildlife Waters

Planning Criteria

Vegetation and Habitat Management

Proposed decisions will be measured against the Arizona Standard for Rangeland Health for desired plant communities that provide for biodiversity and protection and restoration of native species. Desired plant community descriptions will be developed that emphasize the protection of the diversity of natural

communities specified in the proclamation. Monument plan decisions will prioritize achieving or maintaining these desired plant communities. Vegetation will be managed to achieve desired plant communities (considering the ecological site potential) that provide for biodiversity as well as protection and restoration of native species. The plant communities will be managed to protect, improve, and restore communities to provide wildlife habitat and non-consumptive uses including plant protection, visual quality, watershed protection and stability, and water quality. Provisions may be made for hazardous fuels reduction and habitat restoration.

Invasive Species and Noxious Weed Control

BLM will work with county, State, tribal, and Federal agencies, individuals, and Weed Management Agencies to monitor, manage, and control noxious weeds and invasive species. Invasive species and noxious weed control will be considered in the plans in accordance with the integrated weed management guidelines and design features identified in National, State, and local BLM programs and policies. Invasive species and noxious weed infestations will be prevented, contained, and/or reduced on BLM-administered lands using an integrated pest management approach. Proposed decisions will be assessed to determine whether or not they would contribute to the introduction or spread of noxious weeds or invasive species in accordance with the Federal Noxious Weed Act and Executive Order 13112. Management practices that prevent and control invasive species will be emphasized.

Riparian Areas, Floodplains, and Wetlands

Proposed decisions will be measured against the Arizona Standard for Rangeland Health for riparian areas, floodplains, and wetlands that provide for biodiversity and protection and restoration of native species. Riparian areas, floodplains, and wetlands will be managed to protect, improve, and restore their natural functions to benefit water storage, groundwater recharge, water quality, and fish and wildlife values. All management practices will be designed to maintain or improve the integrity of these high-priority values, in accordance with the Clean Water Act and Arizona's Standards for Rangeland Health. Management activities in floodplains will be consistent with Executive Order 11988 and management activities for wetlands and riparian areas will be consistent with Executive Order 11990.

Issues Overview

Comments regarding vegetation were often associated with the value of the vegetation as wildlife habitat and focused on the need to protect vegetation. Some concerns were expressed about invasive plant species and the problems that result for the quality of the habitat as well as the increased potential for fires that burn hotter than would normally occur in the desert environment. Comments regarding the effects on vegetation from grazing management are addressed in Section 3.4.2.3.

Likewise, most comments regarding riparian areas, wetlands, and floodplains focused on the protection of these resources for their contribution to wildlife habitat or to the watershed. Issues associated with their value with regard to water resources are addressed in Section 3.4.2.1.

Compared to the issues of vegetation, invasive species, or riparian areas, wetlands, and floodplains, there were considerably more comments regarding wildlife habitat and wildlife management. Many of the comments noted for the Phoenix South Planning Area regarding wildlife and wildlife habitat also applied to the SDNM. As previously stated, many comments expressed general concern for the proper management and/or preservation of wildlife and wildlife habitat. There were often specific examples or concerns for particular species or category of species (e.g., native fauna, migratory species, saguaro, etc.), type of habitat (e.g., mountain chains, riparian areas, wildlife corridors), or type of impact (e.g., feral burros, motorized vehicle use, habitat fragmentation, etc.). Some comments emphasized the importance

of ecosystem and biodiversity management. Some commenters were particularly interested in providing for habitat restoration and/or general habitat improvement projects. Many comments pertained to general wildlife and wildlife habitat as well as special status species, such as Sonoran pronghorn, cactus ferruginous pygmy-owl, desert tortoise, etc. and are addressed under Section 3.4.2.2.2. There were many comments that supported the involvement of the AGFD for management of wildlife and wildlife habitat and for wildlife-dependent outdoor recreation/hunting.

As compared to the comments received specific to the Phoenix South Planning Area, there was a greater emphasis on preservation of wildlife and wildlife habitat in the comments that were specific to the monument. There was also a greater emphasis on biodiversity and ecosystem management principles. Several comments reiterated the value of wildlife and wildlife habitat resources noted in the Presidential proclamation that created in the monument.

Various wildlife water development programs, initiated in the 1940s and 1950s throughout the western United States, have provided sources of free-standing water under the assumption that this is a key limiting factor on wildlife populations in arid habitats. Such developed waters are attempts by resource managers to benefit target species (typically desert bighorn sheep, mule deer, javelina, other game species, and other wildlife). Ranchers and range managers also have developed water resources for livestock and those waters are used by wildlife. More recently, wildlife water developments have received critical scrutiny as the need for the continued development of new water sources has been questioned. Critics have suggested that wildlife water developments have not yielded expected benefits and may negatively impact wildlife (especially non-targeted species) by increasing predation, competition, and disease transmission. The scientific community in Arizona, led by the efforts of the AGFD, are studying whether developments are necessary for wildlife, what effect developments might have on populations of non-target animals (such as predators), and the development of additional wildlife waters.

As with those comments received for both the Phoenix South and SDNM or just the Phoenix South Planning Area, scoping comments received regarding wildlife water developments applicable to the SDNM represent both sides of this debate. There is a contingent advocating that no new wildlife waters be developed and a contingent stressing the importance of allowing the continued access, maintenance, redevelopment, and/or construction of wildlife waters. As compared to the Phoenix South Planning Area, there were more comments advocating that no new water developments be constructed. These were primarily from organizations emphasizing wilderness management in their comments.

Representative Comments

“Natural hydrolytic functions of springs and streams should be restored and/or maintained.” – AGFD

“Bufflegrass has invaded the monument but is still vulnerable to extirpation with relatively little effort. Every effort should be made to keep other exotic plants from entering or spreading within the Monument. Weed extirpation programs should focus on non-toxic methods that will not damage Monument water tables, wildlife or native plants.” – Sierra Club Grand Canyon Chapter

“Close any road that fragments wildlife habitat, damages plants, soils, and riparian areas or watersheds.”
– Individual, Denton, Texas

“Protect and restore springs and seeps, for critical wildlife water sources.” – Individual, unspecified community

“The Sonoran Desert is a unique precious eco-system. I want it to be protected-especially for its wildlife. So much of the desert has already been eaten by development. If it were up to me, all future development would require habitat protection.” – Individual, Tucson, Arizona

“We need to protect these natural resources (especially wildlife & habitat) because this is the creation. Can't let it be destroyed.” – Individual, Mesa, Arizona

“The most important thing to me is to establish or protect wildlife corridors.” – Individual, Tucson, Arizona

“Because of human population growth cooperative wildlife habitat improvement projects must occur.” – Individual, Yuma, Arizona

“Wildlife needs must be foremost including connection of habitat for migratory species such as desert big horn sheep, avian needs, desert tortoise, roadless areas.” – Individual, Mesa, Arizona

“It is imperative that BLM works closely with AGFD to ensure wildlife, wildlife habitat and wildlife dependent outdoor recreation continues” – Individual, Yuma, Arizona

“The feral burros are also causing problems for the wild animals.” – Individual, Ajo, Arizona

“Many of the species highlighted in the Monument Proclamation are considered sensitive or rare, and require monitoring and proactive management to evaluate population trends and maintain and enhance wildlife habitat conditions.” – AGFD

“BLM should determine maximum carrying capacities and critical ecological thresholds for use to ensure natural resource sustainability within the SDNM.” – The Wilderness Society

“The monument should be a haven for wildlife. BLM's management plan should do whatever is necessary to protect and preserve the biodiversity, integrity and population viability of wildlife within the monument.” – Individual, Tempe, Arizona

“Do not allow artificial water developments.” – Maricopa Audubon Society

“Artificial water developments must not only be maintained and enhanced, they must be increased where needed. Contrary to what you will hear from the environmental extremists, in this century, with the depletion of the water table, and water sources that were here historically, these are necessary for the continued well being of the species that live in the area. The limited motor vehicle passage to do this will do no harm.” – Individual, Oro Valley

“Focusing on wildlife waters ignores other requirements for animal survival, such as food sources, freedom from harassment, and more. For most species, we have probably just begun to know all the parameters that affect population viability. BLM should manage for ecosystem vitality and focus on that and not on just single or a few species. In general, development of artificial wildlife waters has focused on benefits to a very limited number of species without considering the needs of other species.” - Yuma Audubon Society

“The Plan should detail the impacts that water hauling and the availability of artificial waters has on wilderness character. Developed water cannot compensate for lack of suitable habitat any more than it can reverse the arguable impacts of global warming”. – Sierra Club, Grand Canyon Chapter

“Examples of proven proactive wildlife management and conservation activities that should be identified in this RMP/EIS include but are not limited to waterhole development, waterhole maintenance, water hauling and the necessary reasonable vehicular access to accomplish all of the above without compromise.” – Arizona Desert Bighorn Sheep Society

“I support the continued construction and maintenance of desert bighorn sheep waters within the monument.” - Individual, Phoenix, Arizona

“Do not allow any new artificial water developments - they do not really help wildlife, and they will require more motor vehicle intrusions and development in the monument.” – Arizona Wilderness Coalition

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues - Vegetation and Invasive Species

- Repair vegetation on overgrazed parcels.
- Eradicate non-native grasses and restore native grasses.
- Protect native flora and restore damaged vegetation.
- Eradicate invasive species as they threaten wildlife and create a significant fire risk.
- Address management of burros, feral goats, trespass cattle, and renegade ostriches in a timely manner, or expeditiously remove these non-native and habitat damaging animals.

Public Issues - Riparian Areas, Wetlands, and Floodplains

- Close roads that damage riparian areas or watersheds.
- Protect and restore springs and seeps.

Public Issues - Wildlife and Wildlife Habitat

- Protect existing wildlife corridors, particularly for migratory species, and establish corridors by restoring washes and habitat.
- Establish wildlife habitat improvement projects.
- Work in partnership with the AGFD to manage wildlife.
- Work closely with AGFD to ensure wildlife, wildlife habitat, and wildlife-dependent outdoor recreation continues and is not impacted by personal agendas or wilderness designations.
- Protect and restore native fish populations impacted by dams and non-native species.
- Preserve natural habitat and manage for wildlife protection.
- Rehabilitate vehicles routes that fragment habitat.
- Look at wildlife species needs including roadless areas.
- Create a preserve with minimum impact activities allowed.
- Manage food and habitat resources for the Mexican freetail bat, which is important for limiting insects across the desert Southwest.
- Protect wildlife and wildlife habitat as required by the Presidential proclamation that created the monument.
- Accurately portray the wildlife resources and their movements within the monument and clarify misrepresentation in the proclamation language regarding the desert bighorn sheep and Sonoran

pronghorn. The population of desert bighorn sheep in the Maricopa Mountains should not be considered “robust.” The range of the endangered Sonoran pronghorn has not been documented, in recent history, east of Highway 85, and certainly not north of the Sand Tank Mountains.

Public Issues - Wildlife Waters

- Maintain existing wildlife water developments and construct new wildlife water developments (if deemed necessary).
- Allow development and maintenance of both artificial and modified natural waters.
- Allow the necessary reasonable vehicular access to accomplish wildlife water development, maintenance, and water hauling.
- Do not allow/avoid the development of new wildlife waters.
- Do not allow any artificial waters.
- Consider impacts of artificial waters on wilderness character.
- Natural tinajas in the monument provide adequate water for wildlife.

BLM Management Concerns

Concerns regarding vegetation, invasive species, wildlife habitat and wildlife to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Establish desired plant communities, guidelines, and objectives for restoration, revegetation, and reclamation of disturbed lands.
- Evaluate the impacts from OHV use and improper livestock grazing.
- Continue to identify, map, and treat invasive species, including noxious weeds, as a management priority within the planning area.
- Evaluate whether invasive wildlife species may be adversely impacting native wildlife species in some areas.
- Address the need to implement efforts to eradicate invasive species where warranted. Efforts will be coordinated with the AGFD.
- The value of wildlife waters is controversial. There is documentation that supports that developed waters are used by many species, including the targeted big game species for which they are often developed, threatened and endangered species, and avian species. However, others argue that developed waters may be poorly designed, create opportunities for predators to find prey species in vulnerable locations, and attract bees of which most must be assumed to include Africanized (killer) bees, and could potentially spread disease among wildlife.
- Evaluate the information regarding wildlife water development, particularly in coordination with the AGFD as the agency responsible for the State’s wildlife. Decisions will need to be made regarding whether existing water developments will be retained on BLM-administered public lands and regarding the future program for wildlife water developments.
- Consider use of game carriers for retrieval of large game.
- Consider woodcutting restrictions if needed to protect resources.

Issues That Can Be Addressed Administratively

- Encourage user groups to participate in habitat restoration projects.
- Remove the feral burros that compete with wildlife for the habitat.

- Address management of burros, feral goats, trespass cattle, and renegade ostriches in a timely manner, or expeditiously remove these non-native and habitat damaging animals.

3.4.2.2.2 Special Status Species

Planning Criteria

Management decisions will be designed to enhance and maintain habitat for threatened and endangered species. Management actions authorized, funded, or implemented by BLM will be done so as not to jeopardize the continued existence of Federally listed threatened or endangered plant or animal species or result in the destruction or adverse modification of critical habitat. Species proposed for Federal listing and proposed critical habitat will be given the same consideration as listed species. Candidate species and BLM and State sensitive species will be managed so as not to contribute to the need to list as threatened or endangered. The intent is to recover listed species and maintain healthy populations of all other species and therefore avoid the need for further listing of any species as threatened or endangered. Terms and conditions and conservation measures from the biological opinion will be incorporated into the plans.

Issues Overview

Many of those who commented on general wildlife and wildlife habitat also commented on special status species, but the comments are addressed here due to the uniqueness of special status species management. These comments focused on the protection of threatened and endangered species and their habitats. Some comments were general in nature, while others mentioned particular species (e.g., Sonoran pronghorn, cactus ferruginous pygmy-owl, desert tortoise) or management concerns (e.g., fawning/nesting sites, impacts of grazing, effects of off-road driving, etc.). Comments regarding special status species were more prevalent in those comments specific to the SDNM as compared to those comments specific to the Phoenix South Planning Area.

Representative Comments

“I am interested in preserving endangered species of both plants and animals.” – Individual, Somerton, Arizona

“Assist in the Protection of the remaining Sonoran Pronghorn and their habitat in the Sonoran Desert.”
– Arizona Wilderness Coalition

“All habitat for Desert Bighorn and Desert Tortoise and all T&E species should be protected as ACECs to insure protection of these species habitat.” – Individual, unspecified community

“[P]reserve and protect species of concern populations where they occur, including habitat restoration where needed.” – Individual, Phoenix, Arizona.

“This area is potential pygmy owl habitat and must be protected as well as good tortoise habitat.”
– Individual, Tucson, Arizona

“Between the drought and loss of habitat, increasing numbers of species are being threatened or lost. Therefore, it is high time that people like you who are responsible for managing public lands give habitat preservation the highest priority.” – Individual, Carefree, Arizona

“The BLM should fight any effort to name any animal or plant as endangered, stand up to the Fish & Wildlife service for once, extinction is natural and no one cares if some little bird or rat dies off.”
– Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Protect threatened and endangered species and their habitat.
- Pursue special management activities, such as developed waters, for special status species.
- Stop all grazing within desert tortoise habitat.
- Evaluate the effects of grazing on desert tortoise habitat areas.
- Manage in a manner that would allow for implementation of an emergency water project for special status species in the event of prolonged drought.
- Protect special status species habitat by designating the habitat as an ACEC.
- Address woodcutting restrictions resulting from the cactus ferruginous pygmy-owl management actions.

Issues That Will Not Be Addressed

- Protection and management of Sonoran pronghorn and Sonoran pronghorn habitat.
Rationale: The SDNM is outside the current range of Sonoran Pronghorn. However, the BLM will coordinate with the Sonoran pronghorn recovery team in the development of the RMP and take any necessary measures for protection of historic habitat or possibly, reintroduction of Sonoran pronghorn to areas of SDNM.

3.4.2.3 Grazing Management

Planning Criteria

Consistent with the monument proclamation, grazing permits on Federal lands within the monument south of Interstate Highway 8 shall not be renewed at the end of their current term and grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the BLM determines that grazing is compatible with the paramount purpose of protecting the objects identified in the proclamation.

Proposed decisions will determine if allotments are open or closed to grazing in accordance with the Taylor Grazing Act and, if open, in what manner. A priority will be placed on protecting the monument resources, including the diversity of plant communities identified in the Presidential Proclamation. BLM will manage grazing through existing laws, regulations, and policies including the *Arizona Standards for Rangeland Health and Guidelines for Grazing Administration*. Provide for livestock management in an environmentally sensitive manner consistent with resource management objectives, including achieving desired plant communities and land use conditions. Decisions will include a strategy for ensuring that proper grazing practices are followed while preserving habitats for sensitive plant and wildlife species. Appropriate best management practices will be followed to protect rangeland resources, and where necessary, to mitigate any conflicts with other uses and values. Administrative actions to assure compliance with existing permit/lease requirements, to modify permits and leases, to monitor and supervise grazing use, and to remedy unauthorized grazing use will continue.

Issues Overview

As compared to the Phoenix South Planning Area, the comments pertaining to SDNM included more comments advocating the elimination of livestock grazing within the monument. There were many who noted that the Presidential Proclamation stated that grazing permits on Federal lands within the monument south of Interstate 8 shall not be renewed at the end of their current term and that grazing on Federal lands

north of Interstate 8 shall be allowed to continue only to the extent that the BLM determines that grazing is compatible with the paramount purpose of protecting the biological and cultural objects identified in the proclamation. There were many who advocated the elimination of livestock grazing both north and south of Interstate 8, and others who reinforced the sentiment of the Presidential Proclamation. One commenter suggested that BLM should not wait for permits to expire, but should cancel leases for the allotments in the Vekol Valley area now.

As with the comments that pertained to both the Phoenix South Planning Area and SDNM, some commenters did not necessarily oppose livestock grazing, per se, but rather opposed overgrazing. Those advocating ending all livestock grazing on public lands often noted that the natural conditions do not support livestock grazing and expressed concern for the adverse impacts of this use on natural and cultural resources. Those that supported continued livestock grazing typically noted that this is a traditional land use and is beneficial when appropriate range management practices are employed. There were some who advocated prohibiting certain kinds of grazing (e.g., year-round, domestic animals, stock grazing) and those who advocated prohibiting grazing in certain areas (e.g., Sonoran pronghorn and/or desert tortoise habitat, riparian areas), or under certain conditions (e.g., drought, when not sustainable). Some comments addressed the economic aspects of livestock grazing, as further addressed in Section 3.4.2.14.

Representative Comments

“Proper grazing has been an ongoing and beneficial use of the land and should continue, again subject to those using the lands doing so properly.” – Individual, Oro Valley, Arizona

“The Sonoran Desert does not support livestock grazing and request that you begin removal of these uses as leases expire.” – Individual, Fresno, California.

“I would like to see the cattle removed as there is too much competition for a small amount of feed and water and the native wild animals are losing.” – Individual, Ajo, Arizona

“Grazing should be done in a sustainable way.” – Individual, Phoenix, Arizona

“Full market rates should be applied to all grazing leases.” – Individual, Laveen, Arizona

“BLM lands have been over grazed in recent years, perhaps exacerbated by the multi-year drought. Consider to buy-out or retire permits within the planning units.” – Individual, unspecified community, Arizona

“Cattle grazing, while economically marginal, has been a feature of Arizona land use for decades.” – Individual, Tempe, Arizona

“What opportunities are there to acquire grazing permits and reduce the grazing intensity on the public lands?” – Friends of Arizona Rivers

“Do not allow poor grazing practices.” – Individual, Phoenix, Arizona

“Grazing fees on BLM land lag far behind what the states charge and are only about 1/10 of what private landowners charge. This amounts to a give-away of public land resources to grazing animals that can denude the landscape, wiping out native species and encouraging growth of invasive and polluting waterways with sediment and waste. The BLM needs to increase grazing fees and use this money to hire more staff to study and protect the land.” – Individual, San Carlos, California

“Grazing should not be allowed anywhere in the monument.” – Individual, Tucson, Arizona

“No livestock grazing should take place north or south of I-8, as its continued administration will directly harm biological and cultural resources in and around the monument. All of the allotments should be retired before their permits expire.” – Center for Biological Diversity

“Grazing is considered by most ecologists to be the primary cause of ecosystem degradation in arid regions. The Proclamation creating SDNM acknowledges that benefits to the desert ecosystem of removing non-native herbivores and mandates that grazing will end in the southern portion of the monument. In the current planning, BLM must consider ending public lands grazing throughout the entire planning area. Alternatives that should be considered include: No grazing anywhere in Phoenix South, No grazing in SDNM or in wilderness areas.” – Escalante Wilderness Project

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Remove the cattle as there is too much competition for a small amount of feed and water and the native wild animals are losing.
- Prohibit grazing of domestic animals.
- Stop all grazing within Sonoran pronghorn and desert tortoise habitat.
- Mining and grazing contribute to federal receipts and help reduce the financial burden of management.
- Ban cattle from all riparian areas.
- Address responsibility for maintenance of waters, windmills, water tanks, etc. if grazing allotments are not renewed.
- Allow grazing to continue, when managed properly.
- Do not allow poor grazing management practices.
- Take harsh disciplinary action for overgrazing, including cancellation of the grazing lease.
- Eliminate year-long livestock grazing as the lands are poorly suited for such use and the existing ranch operations are marginal; classify these lands for ephemeral grazing only.
- Prohibit stock grazing.
- Limit range improvements and require the lessee to pay for them.
- Prohibit grazing on the monument.
- Comply with the monument proclamation, which provides that grazing permits of Federal lands within the monument south of Interstate 8 shall not be renewed at the end of their current term; and that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that BLM management determines that grazing is compatible with the paramount purpose of protecting the biological and cultural objects identified in the Proclamation.
- Do not allow livestock grazing north or south of Interstate 8; all of the allotments should be retired before their permits expire.
- Phase out grazing south of Interstate 8 when the leases expire.
- Cancel the South Vekol grazing allotment and retire the Vekol and Lower Vekol allotments.

BLM Management Concerns

Concerns regarding grazing management to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Assess the potential impact that grazing allotments may have on natural or cultural objects.
- Consider redesignation of public land to other uses (which may preclude grazing). If such adjustments are considered, size and shape adjustments to grazing allotment boundaries also may be considered.
- Evaluate existing and potential range improvements, including maintenance, to determine if they are compatible with land management goals.
- Re-evaluate the grazing classification for perennial and ephemeral (i.e., seasonal allotments).
- Consider the application of the ephemeral rule to grazing on public lands.
- Develop desired plant communities that prioritize the protection of monument resources when evaluating grazing allotments.

Issues That Will Not Be Addressed

- Increase grazing fees and use this money to hire more staff to study and protect the land.
Rationale: BLM has no authority to adjust or change the grazing fee; it is set by a formula contained in law, as is the disposition of the fees collected.

Issues That Can Be Addressed Administratively

Cancel the South Vekol grazing allotment now (the BLM can revoke the permit at any time in its duration).

3.4.2.4 Wild Horses and Burros

Planning Criteria

Wild horses and burros outside Herd Areas will be removed from the public lands.

Issues Overview

There were very few comments that pertained to wild horses and burros. Some comments mentioned burros, but these were primarily in context of wildlife and wildlife habitat management. One comment that pertained the most to the BLM wild horse and burro program stated that there was no history of wild burro use and no herd management areas and, thus, there is no reason to have the wild horses and burro program for the planning areas. There were no comments specific to the SDNM on this topic.

Representative Comments

“Wild and feral burros should be kept out of these areas. There is little or no history of past burro use; there are no herd management areas; and there is no need to bring into this area the problems which wild and feral burros are causing to desert vegetation and wildlife in Yuma, La Paz and Mohave Counties.”
– Public Lands Foundation, Phoenix

“Burros, feral goats, trespass cattle and renegade ostriches should all be addressed in the RMP/EIS and a means provided to manage, in a timely manner, or expeditiously remove, these non-native and habitat damaging animals.” – Arizona Desert Bighorn Sheep Society

“The feral burros are also causing problems for the wild animals.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

No public issues or BLM management concerns that would be used the development of alternatives were identified for wild horses and burros.

Issues That Will Not Be Addressed

- Do not implement wild horse and burro management in the planning areas.
Rationale: There are no wild, free-roaming horses or burros within the monument, and no herd areas were designated or recognized. Therefore, it is not necessary to address wild horses and burros. There are feral burros on the adjacent Barry M. Goldwater Range and they may reach into the southeastern part of the monument; however, these feral burros are managed outside of the Wild Horse and Burros Act of 1971.

Issues That Can Be Addressed Administratively

- Remove feral burros.

3.4.2.5 Fire Management

Planning Criteria

Fire decisions made in the Arizona Statewide LUP Amendment for Fire, Fuels, and Air Quality EA, initiated in 2003, will be incorporated into the Phoenix South and SDNM Plans. Adjustments to the fire decisions, if required, will be consistent with the Federal Wildland Fire Policy, the National Fire Plan, and all other BLM policy.

Fire suppression will be accomplished with the least amount of surface disturbance and to protect significant cultural or paleontological values. Public lands and resources affected by fire will be rehabilitated in accordance with the objectives identified for the affected area, subject to BLM policies and available funding.

Issues Overview

Comments on the fire management issue focused on a propensity of invasive plant species, which often have more dense stands than occur within native plant communities, to carry wildfires that are destructive to many native species including saguaro. Commenters urged the BLM to eradicate invasive species and restore native grasses to reduce destructive wildfire risks and benefit native wildlife.

Representative Comments

“Maintain & bring back native grasses & retire non-native grasses with fire or other methods. Hot fires of non-native grasses kill saguaros” – Maricopa Audubon Society

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Restore native grasses as non-native grass fires burn hotter than native grass fires and kill saguaros.
- Eradicate invasive species as they threaten wildlife and create significant wildfire risks where none previously existed within native plant communities.

3.4.2.6 Mineral and Energy Resources

Planning Criteria

Public lands within the SDNM are closed to mineral development (subject to valid existing rights) by the Proclamation.

Issues Overview

Among comments that applied specifically to SDNM, there were comments that were opposed to mining as compared to comments that applied specifically to the Phoenix South Planning Area. These comments generally were from those that were also opposed to livestock grazing, OHV use, power lines, etc. and that favored preservation and/or low-impact uses of the area. In addition, there were a few commenters opposed to other forms of mineral/energy resource development such as gas, oil, etc. There were very few comments that supported mining in the monument. Some of the comments that supported mining in the monument suggested that any mining proposal should be subject to validity exams and mining use limited to small-scale operations. There were also comments about the economic contributions of mining (see Section 3.4.1.14). There was support for continued surface mineral collection/recreational rockhounding. One commenter suggested pursuing solar energy development.

Representative Comments

“Mining should be allowed to continue on a limited basis, but if approved, a trust fund should be made a part of the lease to ensure that after mining activities have ceased, the area is returned to its natural state.”
– Individual, Laveen, Arizona

“Please do not allow mining” – Individual, Apache Junction, Arizona

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.”
– Individual, Phoenix, Arizona

“No drilling for oil, gas or water” – Individual, Apache Junction

“I support mining in the monument.” – Individual, Phoenix, Arizona

“Any new mining proposals should be subject to validity exam to prove that the claims are valid. Limit to small scale operations only to limit damage.” – Individual, Tucson, Arizona

“Except for highly strategic and low impact mineral extraction, all resource use should be limited or prohibited in the monument.” – Individual, Phoenix, Arizona

“Coal bed methane wells need to be carefully studied and regulated, or else this will result in an environmental disaster that we will be living with for generations. Small landowners are being screwed

over by selfish corporations who have mineral rights to the land and use irresponsible mining practices. Companies need to improve in their containment and reclamation, and the BLM needs to have the resources to monitor them.” – Individual, San Carlos, California

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Prohibit exploration/drilling for minerals, gas, oil, etc.
- Prohibit mining.
- Mining and grazing contribute to federal receipts and help reduce the financial burden of management.
- Give high priority to surface mineral harvesting.
- Provide for the establishment solar energy collectors.
- Consider acquiring areas of split estate because lack of subsurface rights impairs BLM's ability to manage the land.
- Mining and preservation are inconsistent.
- Stop and remove mining interests from the monument.
- Limit or prohibit resource use in the monument except for highly strategic and low impact mineral extraction.

BLM Management Concerns

Concerns regarding mineral and energy resources to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Consider how to minimize impacts on split estate lands (i.e., where BLM manages the surface, but subsurface ownership in non-Federal) while allowing mineral exploration and development of these non-Federal minerals (about 25,800 acres).
- Consider appropriate guidelines for development of minerals where valid existing rights exist.
- Consider general requirements for protecting resource values of the public lands, including stipulations and construction and/or operating standards to apply to surface disturbing activities for existing rights.

Issues That Will Not Be Addressed

- Allow mining in the monument.
- Do not grant new mineral leases.
- Ensure any new mining claims are valid and limit to small-scale operations.
- Study/regulate coal bed methane wells.
- Limit or prohibit resource use in the monument except for highly strategic and low impact mineral extraction.

Rationale: Lands within the SDNM are closed to mineral development (subject to valid existing rights) by the Proclamation. There is no coal in the planning area.

- It is inappropriate that hardrock mining on BLM lands is governed by such outdated laws such as the General Mining Law of 1872.

Rationale: The RMP/EIS process is intended to comply with existing laws, regulations, and policies. The RMP/EIS will outline this regulatory framework, including laws, guidelines, and policies that go beyond the provisions of the General Mining Law of 1872. The intent of the RMP/EIS process is to develop a plan within current guidelines, not to change the regulatory framework.

3.4.2.7 Lands and Realty

3.4.2.7.1 Land Tenure Adjustment and Withdrawals

Planning Criteria

All lands and interest in lands within the monument will be retained in public ownership. The RMP will evaluate the opportunity for acquiring non-Federal lands within or adjacent to the monument that could protect or enhance management of monument resources. Acquired lands and interests within the monument boundary will be added to the monument. Decisions to acquire lands will be based on public benefits, management considerations, and public access needs. Land tenure adjustments may include only the surface, only the mineral estate, or both. Acquisitions may occur by land purchase, donation, exchange, or transfer of jurisdiction from another federal agency.

The proclamation withdrew the monument from all form of entry, location, selection, sale, or leasing or other disposition under public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument.

Issues Overview

The comments received on land tenure adjustments promoted two goals—adjustments that would protect SDNM from encroachment by incompatible adjacent land uses and adjustments that would consolidate monument lands by eliminating inholdings and fragmented ownership. Commenters urged the BLM to retain public land holdings, use land exchanges, land acquisition, or conservation easements, as necessary, to accomplish these goals for the purposes of deterring urban sprawl or other land uses in order to protect the integrity of public lands.

Representative Comments

"I hope that the BLM will adopt a policy that allows for careful impact consideration before any land holdings are sold or released in the future." Individual, Colondale, Arizona

"For land acquisition, BLM should look at obtaining, through exchange, inholdings in areas primarily managed by BLM. Areas of split estate should also be examined for acquisition, since lack of subsurface rights impairs BLM's ability to manage the land." – Yuma Audubon Society

"What opportunities are there to acquire biologically desirable private and state lands located in the monument?" – Friends of Arizona Rivers

"Prevent sprawl from encroaching the monument --do not trade away adjacent BLM lands for development." -- Individual, unspecified community

"Please continue efforts to acquire the Vekol Road parcel and other parcels of state trust and private lands within SDNM boundaries." – Individual, Tucson, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Do not to sell adjacent lands for development that will likely infringe on the natural quality of the monument.
- Maintain a buffer of undeveloped BLM land around the monument.
- Continue efforts to acquire the Vekol Road parcel and other parcels of State trust and private lands within SDNM boundaries.
- Prevent urban encroachment.
- Do not exchange adjacent lands so that they may be developed and add to the urban sprawl.
- Purchase or at least buy conservation easements on any SDNM inholdings or critical adjoining lands.
- Obtain, through exchange, inholdings in areas of land that are primarily managed by BLM.
- Determine whether it is necessary to acquire inholdings in order to protect the integrity of certain areas, such as wildlife corridors and linkages between wilderness areas.
- Consider acquiring areas of split estate because lack of subsurface rights impairs BLM's ability to manage the land.

BLM Management Concerns

Concerns regarding land tenure and withdrawals to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- BLM will provide guidance for future management of land tenure issues.
- Decisions to acquire lands will be based on management considerations to include public needs. BLM will provide for public participation for land tenure decisions.
- Land acquisition issues, such as in-holdings and adjacent lands, will be addressed during the planning effort.

Issues That Will Not Be Addressed

- Sell off BLM holdings only as an absolute last resort.
Rationale: The BLM does not have authority to sell lands and they can only be exchanged when it furthers the purposes of the monument.
- Use zoning laws to establish a balance between property rights and conservation of natural resources.
Rationale: The BLM does not have purview over zoning laws. Rather, local and county governments are responsible for establishing zoning laws and controlling land use through zoning. However, the potential for acquisition, disposal, and exchange of public lands could have indirect impacts on zoning and development will be considered in the EIS.

3.4.2.7.2 Corridors, Communications Sites, and Renewable Energy Sites

Planning Criteria

Existing and proposed corridors, communication sites, and renewable energy sites will be evaluated for compatibility with protecting the monument resources. Existing corridors and communication sites from

previous plans may be modified, removed, or carried forward. Additional corridors and communication sites, and new renewable energy sites, including wind and solar energy, will be considered based on consideration of monument resource protection, along with established criteria, procedures, and policy, and in association with industry demand and resource protection objectives. New locations for corridors, communication sites, and renewable energy sites also will consider environmental quality, economic efficiency, security, safety, and good engineering and technological practices. Decisions will consider preferred locations and exclusion areas to protect significant resource values.

Issues Overview

A number of comments were received regarding utility corridors that may affect SDNM, but no comments were received pertaining to communications sites and few comments regarded renewable energy sites. Utility corridor comments received from the energy generating and transmission industries urged the BLM to consider the importance of providing additional utility corridors, including those through SDNM, to meet growing demands for electrical energy requirements in Arizona and to save hundreds of millions of dollars in development costs. Commenters that are opposed to the new transmission corridors urged the BLM in general to consolidate requests for new transmission lines within existing utility corridors and not to grant rights-of-way for new corridors through the monument. One exception to the opposition to new corridors was a proposal that new transmission lines be accommodated within corridors established within 400 feet of each side of highways.

Representative Comments

“Further, easements and transmission corridors should not be allowed to bisect the monument. In most of the United States, utilities purchase private easements routes without relying on public lands. Now that existing corridors meet the local public need for safe and plentiful interconnected electric service, it is not necessary to grant routes through National Monuments so speculative private power plants can have a cheap way to reach foreign markets.” – Individual, Phoenix, Arizona

“Please keep out the threats of powerlines in the SDNM and PS.” – Individual, Rochester, Michigan

“It is important that ACF has the potential to utilize the existing SR238/Union Pacific Railroad utility corridor for ROW for its crude and refined products, pipelines, and/or power lines.” – Arizona Clean Fuels

“Protect monument viewsheds and wildlife corridors from new power line development.” – Individual, Tucson, Arizona

“I would like to see elimination of utility corridors along I-8 and have these concentrated near the railroad and pipeline.” – Individual, Why, Arizona

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.” – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Eliminate the utility corridors along Interstate 8 and have these concentrated near the railroad and pipeline.

- Address impacts to TEP to continue to construct, operate, and maintain the existing and proposed electric facilities in the established right of ways.
- Do not restrict existing electric energy distribution lines or prohibit new lines needed to enhance the Southern Arizona electrical system because segments of existing extra high voltage lines are now within the designated SDNM; any potential restrictions could cost hundreds of millions of dollars.
- Do not allow easements and transmission corridors to bisect the monument.
- Do not grant new corridors.
- Do not allow power line development.
- Consider designating utility corridors for existing and future electric transmission facilities in the planning area.
- Create a 400-foot buffer on each side of highways to accommodate future needs.
- Allow APS' electric infrastructure to remain and continue to serve their respective customer loads.
- Consider APS' additional proposed transmission facilities planned in the Phoenix South and SDNM study areas that have not been sited. These proposed facilities and others not in the RMP planning area are identified in our Ten-Year Plan filing to the Arizona Corporation Commission as required by State Statute.
- Provide for the establishment of solar energy collectors.

BLM Management Concerns

Concerns regarding corridors, communication sites, and renewable energy sites to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Examine the locations of the right-of-way corridors identified in the Lower Gila South RMP/EIS.
- Take the appropriate steps to ensure proper coordination with the public to identify current uses of existing transportation and utility corridors, and examine additional areas.
- Evaluate a variety of routes and lands identified for transportation and utility corridors, to limit impact on protected resources.
- Locations of utility corridors will be coordinated within the state and regionally.
- For right-of-way corridors, consider the following:
 - Types of right-of-way facilities to be allowed
 - Right-of-way activities to be allowed or restricted
 - Non-right-of-way activities to be allowed, restricted, or prohibited within the proposed Right-of-way Corridor or Right-of-way Use Area
 - Non-standard or administrative (i.e., resource protection) terms and conditions to be applied to specific right-of-way facilities that may be subsequently located within the Right-of-way Corridor or Right-of-way Use Area
 - Ancillary facilities and “perpendicular” access needed to efficiently gain access to the Right-of-way Corridor or Right-of-way Use Area

3.4.2.8 Recreation

Planning Criteria

A range of landscape settings and associated recreation opportunities will be provided that contribute to meeting projected recreation demands in the SDNM planning area, while meeting the overriding purpose of protecting monument resources and the Arizona Standards for Rangeland Health. Public lands will be identified as being within either special recreation management areas or extensive recreation management areas. A range of developed and dispersed recreation experiences, including both motorized and nonmotorized recreation opportunities, will be provided.

Consistent with the monument proclamation, in order to protect the public during operations at the adjacent Barry M. Goldwater Range, and to continue management practices that have resulted in an exceptionally well preserved natural resource, the current procedures for public access to the Sand Tank portion of the national monument (formerly Area A), shall remain in effect, except to the extent that the Air Force agrees to different procedures which the BLM determines are compatible with protection of monument resources.

3.4.2.8.1 General Recreation

Issues Overview

People reported to enjoy a wide variety of activities in the planning area and the most frequently mentioned activities were hiking, hunting, sightseeing, camping, and observing wildlife. As with the Phoenix South Planning Area, the comments received regarding general recreation paralleled this diversity of recreational interests. Many of the comments overlapped with the transportation/access issues, particularly with regard to motorized vehicle use (see Section 3.4.2.11). Comments advocating the development of non-motorized recreational opportunities as opposed to motorized recreation were more prevalent for the monument than for the Phoenix South Planning Area. The comments also were often intermixed with the topics of camping and recreational shooting, which are addressed in separate subsections below. A large proportion of comments expressed interest in a particular type of recreational activity and the continued opportunity for that activity. There also were many who expressed concern for the management of certain types of recreation to minimize environmental impacts. Several commenters advocated for dispersed recreation, while others advocated for the development of various types of recreational services (interpretive sites, restrooms, RV areas, equestrian facilities, etc.) Among those comments specific to SDNM, there were a greater number of comments that favored dispersed low-intensity recreation use.

Just as with the Phoenix South Planning Area, some comments advocated recreation services, such as permitting and user facilities, while others were against such services/facilities. There were many who commented that there should be increased education about acceptable uses and prohibited activities. While there were many commenters supporting hunting in the planning area, there were a few comments to not allow hunting within SDNM. There were several comments about the need to consider and manage non-motorized trails for hiking and equestrian purposes.

Representative Comments

“The best aspect of the BLM lands is that they provide for active use by citizens; rockhounding, prospecting, off-roading, hunting, etc. I hope that the BLM will continue to support the traditional uses of the land to the maximum extent feasible. By ‘feasible’ I mean to a point where the physical environment remains substantially undegraded, wildlife habitat is preserved, and important archaeological sites retained intact. With increasing human populations nearby, this may ultimately require that activities in

some areas be curtailed or eliminated outright. In the event that certain activities must be halted, I hope that BLM will make every effort to establish additional sites for these activities in other appropriate locations.” – Individual, Glendale, Arizona

“In fairness, certain less-sensitive areas should be set aside for hunting, fishing, and off-road activity, providing all such activities are closely regulated.” – Individual, Phoenix, Arizona

“The RMP/EIS should identify and attend to the potential problems of increased visitation. We are not advocating a decrease in the use of public lands but rather a mechanism that will allow for offsetting mitigation and conservation measures should a problem or concern arise.” – Arizona Desert Bighorn Sheep Society

“The natural and varied geological terrain offers both educational and recreational opportunities for future generations of citizens.” – WTCC, Inc.

“Develop informational kiosks displaying information about acceptable uses and prohibited activities. Leave No Trace information should be available as well.” – Arizona Wilderness Coalition

“I would like to see [these areas] managed in a balanced and responsible way, so that all people can continue to enjoy the public lands from OHVs to horse riders, hikers and mountain bikers.” – Arizona ATV Riders

“We also urge BLM to end hunting on its lands, preferably the entire Phoenix South area, but at least in SDNM. Hunters kill the healthiest individuals whereas predators kill sick or weak individuals. It is obvious which strategy improves the health of prey populations.” – Escalante Wilderness Project

“I think that outdoorsmen who wish to hunt this area should be welcomed. As a hunter myself, it has been my experience that Arizona's hunting community is both numerous and generally conscientious with respect to land use.” – Individual, Tempe, Arizona

“Stop hunting in the monument.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Provide opportunities to ride horses.
- Promote dispersed recreation.
- Address the potential problems that could arise from increased visitation.
- Recognize that all recreationists need to share the lands.
- Continue to support traditional recreational uses to the extent feasible.
- Take advantage of educational and recreational opportunities.
- Develop recreational facilities.
- Continue to allow hunting.
- Do not allow hunting (BLM will coordinate with AGFD, which has management authority for wildlife, including hunting).
- Maintain a system with various types of trails to accommodate the different types of uses such as OHV, equestrian, hikers, etc.
- Provide equestrian trails.

- Do not institute a user fee program.
- Do not construct restrooms in the monument.
- Consider a prohibition on hunting. (As noted below under the subheading “Issues That Will Not Be Addressed,” not allowing hunting could be a viable alternative for some part of the planning area, but BLM would need to petition the Arizona Game and Fish Commission. The decision would be subject to the approval of the Commission.)

BLM Management Concerns

Concerns regarding recreation to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Examine visitor use to determine how best to manage the consumptive uses of visitors while protecting the resources within the planning area.
- Consider guidelines for what is permissible in areas where vehicles are prohibited from driving off of established routes, particularly with regard to pulling off the road to camp or otherwise park vehicles.
- Designate routes as open, closed, or limited.
- Examine ways to minimize potential conflicts between motorized and non-motorized recreational users.
- Consider limits of acceptable change and associated management decisions for sensitive areas that receive heavy use.
- Consider the need for use limits in heavy use areas.
- Identify and manage for public safety and resource protection issues at historic mine sites, which often are popular visitor destinations.
- Address large-group camping and large-group recreational use.
- Consider the compatibility of commercial recreational uses, special recreation permits, and other organized events with protecting the monument resources. Consider guidelines and stipulations that may be required to protect monument resources if such events are allowed.
- Identify visitor use patterns and devise a management plan that focuses on the need and purpose of the monument and how recreation opportunities either enhance or negatively impact the natural and cultural resources within the monument.
- As local and regional populations increase in and near the vicinity of the monument, recreation patterns may shift. Recognize there may be unforeseeable consequences related to population growth and recreational uses and improved recreation opportunities through technology. Provide a conduit to address changes and challenges while maintaining the purpose of the monument.

Issues That Can Be Addressed Administratively

- Make the permit system more user friendly.

3.4.2.8.2 Camping

Issues Overview

As with the Phoenix South Planning Area, there were more comments supporting dispersed recreational camping and few services and some negative comments about the impacts of roadside, large group, and RV camping areas.

Representative Comments

“Campgrounds and camp facilities should be available, and although ‘primitive’ could be the byword for the 19 year old zealot crowd there are older folks who would also like to use this ground and may prefer to bring in appropriate and comfortable camping equipment. Most of our older generation have earned the right to use Federal land by their actions and not just their words.” – Individual, Oro Valley, Arizona

“I prefer open-camping management, no designated camping areas.” – Wildlands Restoration

“Restrict areas for RV camping” – Individual, Ajo, Arizona

“I recommend that primitive camp sites be designated in the monument. Fully developed campsites for the motorhomes, trailers, etc. should be developed OUTSIDE the monument. Let campers bring in their own water. Allow only propane, etc. stoves.” – Individual, Tucson, Arizona

“Boondocking (trailer or RV camping) should be limited to 10 days in any given National Monument.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Manage for primitive, dispersed camping.
- Control/limit RV camping.
- Require campers to bring in their own water.
- Address impact of wood gathering. In this limited rainfall area, woody vegetation grows very slowly and is severely impacted by wood gathering near campsites.
- Allow only propane, etc. stoves.
- Ban not only wood gathering, but all campfires on lands in Phoenix South.
- Designate primitive campsites in the monument; fully developed campsites for motor homes, trailers, etc. should be developed outside the monument.
- Do not establish new campground developments that would encourage vehicle use.
- Do not establish roadside campgrounds.
- Manage the camping areas.
- Prohibit RV use in washes near cultural sites.
- Limit trailer/RV camping stays to 10 days.
- Establish developed campsites for older visitors.

BLM Management Concerns

Concerns regarding camping to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider whether established camping areas are needed on public land, options may include long- or short-term visitor areas.
- Address large-group camping and large-group recreation uses.

- Consider a strategy to address increasing dispersed camping, including cluster camping, loss of native vegetation, and sanitary concerns.

Issues That Can Be Addressed Administratively

- Develop a system of informing people where acceptable spots for dispersed primitive camping are. Limit the use of Karsonites as they can take away from the primitive experience.

3.4.2.8.3 Recreational Shooting

Issues Overview

Recreational shooting is meant to describe target-shooting activities as opposed to hunting for game species. There are two general types of recreational shooting—dispersed target shooting by individuals or small groups of individuals using sporting firearms and organized shoots by large groups in a concentrated location using a wide variety of firearms, which may include fully automatic weapons. Some people indicated that an activity that they enjoy in the planning area is recreational shooting. However, there were several comments opposing recreational shooting due to its resource impacts as well as noise and public safety concerns. One commenter wanted to continue to use a recreational shooting site within the monument in the Rainbow Valley Area.

Representative Comments

“[N]o target shooting and no carrying of weapons on public lands.” – Individual, Apache Junction, Arizona

“Target shooting (but not hunting) needs to be phased out due to damage to resources, intrusion on other recreationists because of noise or danger, and population growth. (Shooters have many established shooting ranges available.)” – Individual, Phoenix, Arizona

“I enjoy a variety of activities in this area, including target shooting, camping, etc.” – Individual, Phoenix, Arizona

“I ask that recreational shooting on the lands south of the pipeline road, below the junction of Rainbow Valley and Patterson Roads continue to be a permissible activity” - Individual, Goodyear, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Eliminate recreational shooting.
- Do not allow the carrying of weapons on public lands.
- Continue to allow recreational shooting on the lands south of the pipeline road, below the junction of Rainbow Valley and Patterson Roads.

BLM Management Concerns

Concerns regarding recreational shooting to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping) are as follows:

- Address target shooting, particularly in areas of heavy use where public safety may be an issue and where significant resource damage is occurring.
- Evaluate areas in the planning area where target shooting is appropriate.
- Determine which areas are appropriate for target shooting in the SDNM planning area.
- Identify which areas and saguaro populations have been impacted by target shooting and associated vandalism.

3.4.2.9 Special Area Designations

Planning Criteria

The BLM will review, through this planning process, lands within the planning area with that may possess remote or primitive characteristics. Consistent with BLM policy, the Secretary of the Interior letter to Senator Robert Bennett (dated April 11, 2003), and the settlement in the case of Utah v. Norton (dated April 14, 2003), BLM has the authority to discuss and incorporate wilderness values into the land use plan, in accordance with the public process incorporated in all land use planning efforts. Thus, BLM is committed to listening to public input through the land use planning process and, where appropriate, managing specified areas of land for wilderness values. However, BLM has no authority to establish new WSAs or to report such areas to Congress. BLM can protect areas in their natural state using a wide range of land use tools other than the WSA designation process.

Current Congressionally designated wilderness areas will be managed according to the 1990 Arizona Desert Wilderness Act, the Wilderness Act, regulations for wilderness management at 43 CFR 6300, interim management plans for wildlife and fire management in wilderness, and the applicable Wilderness Management Plans. The RMPs will not address reducing or eliminating existing wilderness areas, nor will the RMPs address changing existing boundaries or allowing mechanized or motorized access in any area within them.

Special areas on public lands include wildernesses, WSAs, ACECs, national trails, wild and scenic rivers, national conservation areas, and backcountry byways. Special areas that may be considered in this plan include ACECs, national trails, national conservation areas, and backcountry byways as consistent with federal law as well as policies and procedures. Management requirements for designated special areas will be identified in the plan.

Issues Overview

Many commenters urged BLM to consider protecting various areas of the SDNM—including the Sand Tank Mountains, Margies Peak, and Butterfield Pass areas—by designating these locations as the WSAs. More specifically, the Sierra Club/Arizona Wilderness Coalition form letter suggested designating more than 140,000 acres of potential wilderness in the Sand Tank Mountains, Margies Peak, and Butterfield Pass Units. The form letter also urged BLM to protect the wild land resources within the monument. Some commenters called attention to a need to recognize and protect locations with outstanding wilderness qualities without specifying the need for WSA or other special management areas. Comments in opposition to new wilderness designations also were received. Some of these comments expressed the view that there were already too many "off-limits" locations in the region and that designations such as wilderness, WSAs, and ACECs are inconsistent with multiple-use concepts and opportunities. Concern was expressed that ACECs would be used as a substitute for wilderness areas.

Representative Comments

“Who knows what scientific significance preserving this desert wilderness may have, but I'm sure it's beneficial to the circle of life.” – Individual, unspecified community

“There is far and away more wilderness in Arizona than is necessary. The contemplation of creating more is nonsense. This is public land and the public must have a right to continue to use it; in limited ways, perhaps, but not so limited as to effectively bar its use.” – Individual, Oro Valley, Arizona

“We do not favor creation or study of any new wilderness areas in the planning units.” – Northern Arizona Chapter of Safari Club International

“No more wilderness areas. If there is a wilderness criteria look at a back county by-way in lieu of complete closure to all OHV's.” – Individual, Gilbert, Arizona

“The Sand Tank Mountains should be managed as wilderness and recommended for designation. This area was not available for consideration during the wilderness designation process of the 1980s and 1990s because it was part of the Barry M. Goldwater Range. Its isolation and low impacts make it a perfect candidate for wilderness. The Margies Peak and Butterfield Pass/Stage Route initial study areas should be given Wilderness Study status. This would be consistent with the purposes for which the monument was established.” – Yuma Audubon Society

“Absolutely no more Wilderness within the SDNM.” – Yuma Valley Rod & Gun Club, Inc.

“No more wilderness areas. If there is a wilderness criteria look at a back county by-way in lieu of complete closure to all OHV's.” – Individual, Gilbert, Arizona

“All habitat for Desert Bighorn and Desert Tortoise and all T&E species should be protected as ACECs to insure protection of these species habitat.” – Individual, unspecified community

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Preserve the wildness and wildlife values in the areas of the Sand Tank Mountains, Margies Peak, and Butterfield Pass.
- Ensure that wilderness designation is effective in protecting wilderness areas; the Table Top Mountains Wilderness appears vulnerable to impacts from adjoining private lands, particularly when future urban sprawl is considered.
- Recognize and protect outstanding wilderness resources.
- Consider that too many "off limits" areas (such as wilderness, WSAs, ACECs, buffers, etc.) can destroy multiple use concepts and opportunities.
- ACECs should not be used as a substitute for wilderness designation when an area otherwise meets the criteria for wilderness.
- Consider Backcountry Byway designations.
- Do not study any more wilderness areas in the SDNM.
- Establish ACECs to protect habitat for sensitive and special status species.

BLM Management Concerns

Concerns regarding wilderness and special management areas to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider other special designations, including Backcountry Byways, when appropriate to achieve resource management goals.
- Designate ACECs within the monument in areas meeting the relevance and importance criteria presented in BLM’s 1610 Land Use Planning Manual.

Issues That Will Not Be Addressed

- Designate 140,506 acres of potential wilderness in the Sand Tank Mountains, Margies Peak, and Butterfield Pass Units as WSAs as outlined in the Arizona Wilderness Coalition proposal.
- Do not establish any additional wilderness or WSAs; these misguided preservation designations have detrimental impacts on wildlife populations as a result of unwarranted burdens

Rationale: In accordance with a stipulation and settlement in the case of the *State of Utah; Utah School and Institutional Trust Lands Administration; and Utah vs. Gale Norton, Secretary of the Interior* in the United States District Court District of Utah, Central Division, the Department of the Interior acknowledged that the authority of the BLM to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 2, 1993. Thus, BLM is without authority to propose or establish WSAs.

3.4.2.10 Visual Resources

Planning Criteria

A VRM classification will be conducted to address the public’s concerns about open space and natural vistas. Some areas may be subject to special measures to protect resources or reduce conflicts among uses. The monument will be managed to protect the viewshed and other visual resources that are compatible with the purposes for which the monument was established.

Issues Overview

There were many comments that attested to the beauty of the land and the value of scenic views/open space. Fewer comments addressed specific concerns for the protection of visual resources such as general development/urban sprawl, impacts of recreational use (in particular, off-road vehicle use), and development of power lines. As compared to visual resource comments pertaining just to the Phoenix South Planning Area, there were a greater number of comments expressing concern for the protection of the visual resources within the monument.

Representative Comments

“As urban sprawl spreads out of control from Phoenix and elsewhere, I value the open space and undeveloped nature of our public lands.” – Individual, Tucson, Arizona

“This is a wonderful Monument that embodies much that is wild and beautiful about the Sonoran Desert and it deserves full protection.” - Individual, Tempe, Arizona

“Protect monument viewsheds and wildlife corridors from new power line development.” – Individual, Tucson, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Protect the natural beauty of the land; do not develop the very things that make this area beautiful and unique.
- Protect the area from vandals (e.g., people have smashed boulders to gain access with trucks and ATVs, chipped off the Indian art and hauled it away, used paint balls, shot down saguaro cactus, etc.).
- Prohibit ORV use, which damages views by creating dust and killing vegetation.
- Protect viewsheds.
- Protect this wonderful monument that embodies much that is wild and beautiful about the Sonoran Desert.
- Protect monument viewsheds from disruption by development and power line construction.

Issues That Will Not Be Addressed

- Protect the viewsheds through zoning and other mechanisms.
Rationale: Local and county governments control land use through zoning. The BLM mechanism that considers viewshed protection is the VRM system, which will be incorporated into the EIS alternatives. The EIS alternatives also may consider lands for acquisition, disposal, and exchange, which could have indirect effects on zoning and development to be considered in the lands/realty evaluation. Therefore, while BLM cannot control zoning, it can address the protection of viewsheds through other means.

3.4.2.11 Transportation and Access

Planning Criteria

The plan will include transportation and access needs for motorized and non-motorized uses.

Consistent with the proclamation, all motorized and mechanized vehicle use off-road will be prohibited, except for emergency or authorized administrative purposes. The plan will designate a network of routes for motorized and mechanized vehicle use. Protection of the monument resources, public safety, current and future user access needs, and conflict resolution will be considered in making these decisions. The BLM route inventory will provide a basis for considering route management.

3.4.2.11.1 General Access

Issues Overview

There were many comments regarding access to public lands. Those that were general in nature are addressed here. Because a large number of comments on this resource category specifically addressed motorized vehicle use and road management, these are addressed under separate topic headings below. Comments on non-motorized trails are addressed under the topic of recreation, Section 3.4.2.8. Comments specific to access for Native Americans is addressed under the topic of Native American issues, Section 3.4.2.17. The majority of comments regarding general access to public lands in the SDNM were concerned that the monument designation/RMP may impose additional limitations or restrictions on their access to public lands in the monument. As compared to the Phoenix South Planning Area, there were a greater proportion of comments that were in favor of preservation and restrictions or limitation on general access within SDNM. However, there were also many who were opposed to any restrictions or limitations

to public access. There were some who noted that there should be consideration to provide adequate access for those who are unable to walk long distances. There were others that were specifically interested in access for wildlife management, for scientific/research purposes, by Native Americans, and to private property. General access concerns were also often noted in those comments that principally regarded the designation of special management areas (particularly wilderness), with those in favor of special management designations also in favor of general access restrictions and those opposed to special management designations also opposed to any restrictions to general access.

Representative Comments

“Hunters, herpetologists, photographers, trekkers, etc., should be allowed to continue to have free and unfettered access.” – Individual, Oro Valley, Arizona

“Keep the desert available only to the birds, and animals willing to brave it on foot. There is no God-given right to total access anywhere on the planet. This area does not have to be the first.” – Individual, Ajo, Arizona

“Allowing people to have access to and freedom to engage in a number of activities are an important component of BLM stewardship.” – Individual, Colondale, Arizona

“Value: The fact that there are public lands, the public should be allowed to access them as they are now.” – Individual, Yuma, Arizona

“Access, especially in wilderness areas, is sometimes a problem.” – Individual, Mesa, Arizona

“Primary concern is that the establishment of SDNM and development of a RMP does not compromise, restrict or unnecessarily delay sound wildlife management and conservation activities.” Arizona Desert Bighorn Sheep Society

“The lands provide me an opportunity to experience open space and the natural environment without trespass on private property.” – Individual, Glendale, Arizona

“There is too little access to public lands in this area. Table Top wilderness has very little access unless a person can walk several miles. A lot of people are unable to walk very far, and are being denied access to public lands because of this reason. Allow more access to T.T. wilderness area, and other wilderness areas and do not restrict access to this area.” – Individual, Maricopa, Arizona

“Any negative impact (limitations and/or restrictions) to the Department's ability to accomplish necessary wildlife management activities is inconsistent with the wildlife-related purposes for which the area was designated as a National Monument.” – AGFD

“In the Sonoran Desert National Monument, I place protection of the monuments cultural (historic), wildlife habit, and natural values ahead of public access.” – Individual, Phoenix Arizona

“It is our belief that proper forms of commercial access in the SR238/Union Pacific Railroad transportation and utility corridor, will not be counter to BLM objectives regarding the SDNM and are crucial to the economic vitality of AZ.” – Arizona Clean Fuels

“BLM should specify how it plans to address access to private property.” – The Wilderness Society

“I value the access possible before designation as a national monument.” – Individual, Yuma, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Manage for public access and use.
- Do not change, restrict, or curtail public access.
- Restrict/limit/decrease access.
- Maintain public availability to the assets of these public lands.
- Consider access for those who are unable to walk for long distances.
- Restrict public access, if necessary for protection of the monument’s natural and cultural resources.
- Allow adequate access for wildlife management activities.
- Include provisions for appropriate access to the Monument by qualified researchers and educators in a variety of fields of science and history, consistent with both the Antiquities Act and the Presidential Proclamation
- Address access to private property.

BLM Management Concerns

Concerns regarding general access to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Address access, easements, or rights-of-way across private lands in order to secure access to public lands.

3.4.2.11.2 Motorized Vehicle Use

Issues Overview

As with the Phoenix South Planning Area, there were a large number of comments focused on motor vehicle use in SDNM. Often, but not always, these comments were synonymous with management of the motorized transportation system, which is addressed below under “Road Management.” There were comments from both advocates and critics of certain types of vehicle use (e.g., ATVs, OHVs/ORVs, dune buggies, dirt bikes, etc., generalized here as OHV use since that is the term used by BLM, and RVs/trailers) as well as comments about the type of motorized vehicle use that should be allowed or restricted (e.g., driving in washes, challenge courses, off-road use areas, etc.). Related issues were concerns for the noise generated by certain types of vehicles and regulation/law enforcement (also see the discussion of law enforcement, Section 3.4.2.13). There were many specific concerns for how OHV use could have adverse impacts on monument objects, wilderness qualities, wildlife and wildlife habitat, etc. There were several commenters that noted that Presidential Proclamation prohibits motorized and mechanized vehicle use off of roads.

Similar to the Phoenix South Planning Area, the viewpoints offered by the public on this issue fell into two general categories—those that valued OHV use and favored no or minimal further limitations on OHV use and those that expressed concern for the adverse effects of unregulated OHV activities. Many members of the public were of the opinion that OHV use and OHV oriented activities are legitimate recreational uses of public lands and opportunities for this activity should remained as unfettered as possible. Some proposed that off-road use areas should be designated or that motorized vehicle use should be allowed in major washes. Those who were concerned about unregulated/unrestricted OHV use did not challenge legitimacy of the use of 4-wheel-drive vehicles to gain access to public lands on established

roads, but expressed particular concerns about the potential negative environmental impacts of vehicle use (e.g., damage to cultural sites, vehicle tracks, dust, noise, impacts to washes and riparian areas). Some promoted off-road use areas and/or off-road vehicle challenge courses, while others thought that these activities should be excluded or limited within the planning area.

Representative Comments

“Driving in washes should continue and no vehicle routes in use presently should be closed. The land has stood up well over the past decades without the help of environmental zealots.” – Individual, Oro Valley, Arizona

“Only limited non-motorized travel should be allowed.” – Individual, unspecified community

“I urge you to limit the ORV trails and to limit the areas that are used for ‘extreme courses.’”
– Individual, Tonopah, Arizona

“Policing of ATVs and mountain bikers is very important because a few - who destroy areas and cause erosion by going off trails - destroyed it for the many.” – Individual, Buckeye, Arizona

“In all areas, ORV's require careful monitoring and limited access to designated routes only. When this cannot be done, they should not be allowed at all.” – Individual, Midland, Texas

“We are concerned that established traditional roads, washes, and trails will be closed and that access to many areas of the monument may become overly restrictive.” – Arizona Desert Bighorn Sheep Society

“In the January 2001 SDNM proclamation it clearly states, "For the purpose of protecting the objects identified above, all motorized and mechanized vehicle use off road will be prohibited, except for the emergency or authorized administrative purposes." This means that all routes existing at the time of the proclamation that didn't meet the definition of a road should now be closed. There is no evidence that management has followed this mandate to date.” – Arizona Wilderness Coalition

“Designate and manage critical areas to protect against harm to monument objects: keep these critical areas roadless and open to non-motorized and non-mechanized recreation only.” – Sierra Club Grand Canyon Chapter

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Prohibit motorized vehicles in all riparian areas.
- Prohibit driving in washes.
- Allow driving in washes.
- Address noise from OHV use, which is prevalent into the night in some areas.
- Do not allow ATVs, RV generators, etc. because of noise.
- Restrict/regulate OHV use as this use can promote erosion and damage plants and animals.
- Prohibit ATVs and dune buggies.
- Allow ATV use.
- Recognize OHV use as a legitimate use of public lands.
- Provide additional motorized public access for those who are unable to walk long distances.

- The Presidential proclamation clearly prohibits motorized and mechanized vehicle use off of roads.

BLM Management Concerns

Concerns regarding motorized vehicle use to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider what types of vehicle uses, including competitive events, races, and challenge courses are consistent with protecting the monument resources.

Issues That Will Not Be Addressed

- Provide additional motorized public access in wilderness areas for people who are unable to walk long distances.
Rationale: Wilderness areas are designated by Congress and must be managed in accordance with the Wilderness Act of 1964, which expressly prohibits motorized vehicle use as a means of public recreation conveyance. The BLM has no authority to develop new or open old motorized vehicle routes within existing designated wilderness.
- Limit or exclude OHV off-road use areas and/or off-road vehicle challenge courses.
Rationale: OHV use areas are precluded from the monument by the Presidential Proclamation.

Issues That Can Be Addressed Administratively

- Continue to educate the public about appropriate off-road driving behavior.

3.4.2.11.3 Road Management

Issues Overview

Comments regarded as applicable to the road management topic were those that focused on the transportation network, leaving roads open or closing roads, road maintenance, and the environmental impacts of roads. As compared to comments on this topic specific to the Phoenix South Planning Area, there were a greater proportion of comments in favor of road closures among those comments specific to the SDNM. A suggested transportation plan map for the SDNM was attached to a number of comments. However, the opposing viewpoint, that existing roads should be kept open for public use and, where necessary, maintained, upgraded, or improved to provide safe and efficient public access, also was represented in the comments for SDNM. Some commenters were opposed to the creation of new roads and/or believed that unnecessary roads should be closed, particularly if the roads might fragment wildlife habitat or damage archaeological sites or riparian areas. Others emphasized the popularity of OHV-based recreation and called for designating OHV use areas in locations with low wildlife habitat values where this activity could be pursued. Some comments emphasized that the BLM should increase law enforcement and use public education and other management measures to control ORV damage within the monument rather than resorting to road closures. There were several commenters who expressed interest in being involved in the detail of the road inventory and transportation alternatives planning process.

Representative Comments

“Roads are a necessary evil in that they deface the landscape and disturb wildlife in addition to providing access.” – Individual, Tempe, Arizona

“I am very concerned about the protection of cultural and biological resources and the road system is the management key.” – Individual, Tucson, Arizona

“I agree there may be some areas that need route restrictions, but please lets not close every thing to OHV use. OHV is a legitimate use of public lands.” – Individual, Bakersfield, California

“Continue to educate the public about off road driving but don't punish everyone because of the very, very few who break the rules.” – Individual, Gila Bend, Arizona

“Prevent driving in washes and close and rehabilitate all vehicle routes that threaten cultural and historic sites; fragment wildlife habitat; and damage plants, soils, and riparian areas and watersheds.”
– Individual, Tucson, Arizona

“No off road travel allowed with a detail travel plan and a ‘closed unless signed open’” – Escalante Wilderness Project

“Further, unauthorized ‘roads’ often proliferate due to illegal off-road ORV activity when road regulations are laxly enforced.” – Individual, Tempe, Arizona

“In all areas, ORV's require careful monitoring and limited access to designated routes only. When this cannot be done, they should not be allowed at all.” – Individual, Midland, Texas

“To protect these features against the onslaught of unmitigated recreation, sprawl and motorized and mechanized vehicular abuses, the BLM should adopt the SDNM Transportation Plan (attached). This plan provides for reasonable visitor access while creating a manageable, enforceable network of designated roads.” – Sierra Club, Grand Canyon Chapter

“Create a transportation system that provides reasonable access while upholding monument purposes. Prevent driving in washes and close and rehabilitate all vehicle routes that threaten cultural and historic sites, fragment wildlife habitat, and damage plants, soils, riparian areas and watersheds. Do not allow off road vehicle challenge courses or sacrifice areas” – Arizona Wilderness Coalition

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Manage the road system network to protect cultural and biological resources.
- Keep road construction to a minimum.
- Do not create new roads.
- Maintain, upgrade, and improve existing roads to continue to provide the public with the safe and efficient transportation system.
- Existing roads should be made passable.
- Do not overly restrict motorized vehicle access on traditionally used roads, washes, and trails.
- Close unnecessary roads, especially those that lead to archeological sites or riparian areas, or that fragment wildlife habitat.
- Establish a closed unless signed open policy for roads.
- Emphasize increased law enforcement patrolling and other management measures to control ORV damage rather than closing roads

- Adopt a measure for managing the road/vehicle route network available for public use that specifies that a road/vehicle route is closed to public use unless it is specifically marked as open.
- Keep established traditional roads, washes, and trails open to motorized vehicle access; do not overly restrict access.
- Present the public with a series of alternative transportation systems in the Draft RMP appropriately analyzed in the DEIS pursuant to NEPA.
- Apply a legal definition of road within the planning process and develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads."
- Close all roads that did not meet the definition of a road at the time of the Presidential Proclamation.
- Emphasize increased law enforcement patrolling and other management measures to control ORV damage rather than closing roads.
- Adopt the model used by the BLM in the Grand Staircase Escalante NM for transportation system planning.
- Adopt the transportation system recommended by Sierra Club, Arizona Wilderness Coalition and other citizen groups.
- Consider whether closing public road use will produce congestion along remaining roads and road accessible areas.

BLM Management Concerns

Concerns regarding road management to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Determine whether Sand Tank Wash and Bender Wash, north of Area A, are roads. If they are roads, determine use by mechanized and/or motorized vehicles.
- Consider access to the monument considering the constraints of limited access highways (Interstate 8 and State Route 85).

Issues That Will Not Be Addressed

- Designate OHV use areas in locations with low wildlife habitat values or where this use is already popular; keep each OHV use area to about 30 acres with twisting and interlaced trails.
Rationale: The Presidential Proclamation prohibits off-road use, so no such area can be designated within the monument.

Issues That Can Be Addressed Administratively

- Do not use signs to designate routes.
- Adopt a measure for managing the road/vehicle route network available for public use that specifies that a road/vehicle route is closed to public use unless it is specifically marked as open.
- Update public use road maps.

3.4.2.12 Airspace

Planning Criteria

Two legal instruments have relevance to military airspace use over the monument and Phoenix South Planning Area. The 1990 Arizona Desert Wilderness Act, which established the existing wilderness areas in the SDNM and Phoenix South Planning Area, provided that these wilderness designations were not to interfere with the continuing use of existing military training areas, modification of those military training areas, or the development new low-level routes needed to support military training missions. Presidential Proclamation 7397, which established the SDNM, provides that nothing in the Presidential Proclamation: "shall preclude low level overflights of military aircraft, the designation of new units of special use airspace, or the use or establishment of military flight training routes over the lands included in this proclamation." These legal instruments demonstrate that proposed plans for the management of SDNM and Phoenix South Planning Area should not include provisions that would infringe upon continued or future military use of overlying airspace.

Issues Overview

Only a few comments were received regarding airspace; none of these comments raise an issue that indicates that airspace needs to be addressed through the development of EIS alternatives. The comments indicate that military special use airspace and military training routes are environmental factors that should be taken into consideration in the assessment of the effects of alternatives for special management area designations and other land resource management prescriptions. One comment indicates that the EIS should consider how proposed special management designations could adversely impact military overflights. Another comment suggests that the BLM should work with military airspace users to restructure flight paths and schedules over SDNM to minimize the effects of military overflights on the monument and wildlife populations.

Representative Comments

“Showing military airspace on planning maps is vital to your planning efforts for BLM land in Arizona.”
– 355 OSS/OSOA, Davis-Monthan Air Force Base

“BLM should coordinate closely with military agencies to attempt to work out an optimal schedule for overflights so that animal populations are not adversely affected.” – Yuma Audubon Society

“[These areas] should be managed so they do nothing to interfere with operations at Luke AFB. No Wilderness study areas at all, this designation could be used by radical extremist environmentalists to complain about noise who would then want to shutdown flight operations because of noise. Wilderness study areas in this area should be considered anti military & therefore un-American. The property by Gila Bend that the BLM just got from the military under no circumstance should any of it be considered for wilderness (unless worthless land)” – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

- Identify and consider special use airspace and training routes used by the military.

BLM Management Concerns

Concerns regarding airspace to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Low-level commercial and private overflights are a growing use of the public lands, consider appropriate management of resources and uses relative to overflights.

Issues That Will Not Be Addressed

- Consider how wilderness designations could adversely impact military overflights.
Rationale: In accordance with a stipulation and settlement in the case of the *State of Utah; Utah School and Institutional Trust Lands Administration; and Utah vs. Gale Norton, Secretary of the Interior* in the United States District Court District of Utah, Central Division, the Department of the Interior acknowledged that the authority of the BLM to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 2, 1993. Thus, BLM has no authority to propose or establish new WSAs and there is no potential for conflicts to emerge between military airspace use and WSA designations. The proclamation establishing SDNM provides for continued military use of airspace over SDNM, including over existing wilderness areas.
- Work closely with nearby military bases and airports to schedule flights and design flight paths that are the least intrusive to wildlife populations and the National Monument.
Rationale: Nothing in the proclamation provides for BLM to dictate flight paths, and the many and varied uses by the military of the airspace over the monument precludes establishing specific flight paths. The military already has specific high altitude flight paths, but they are very wide.

Issues That Can Be Addressed Administratively

Where overflight issues are a concern for monument management, (e.g. endangered species), work with the military to reduce/minimize potential impacts.

3.4.2.13 Law Enforcement

3.4.2.13.1 BLM Rangers

Planning Criteria

No issue specific planning criteria have been identified.

Issues Overview

Comments about enforcement of BLM's policies and regulations for public land regard oversight of recreational use, and OHV use in particular. There were a number of comments regarding undocumented immigrants and illegal drug smuggling, as detailed below. Some comments assert the perception that some recreational users are littering and that more oversight and law enforcement is needed to reduce this.

Representative Comments

“Policing of ATVs and mountain bikers is very important because a few - who destroy areas and cause erosion by going off trails - destroyed it for the many.” – Individual, Buckeye, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

No public issues that would be used in the development of alternatives were identified for BLM rangers' role in law enforcement.

BLM Management Concerns

Concerns regarding law enforcement to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- When developing resource management objectives, consider the need for an enforcement aspect, including developing appropriate penalties.
- Enforce federal laws and regulations pertaining to use, management, and development of the public lands and their resources. Particularly, evaluate options to effectively enforce vehicle laws.

Issues That Can Be Addressed Administratively

- More law enforcement is needed to address poaching, dumping, cross-country ATV use, etc.
- Have an adequate number of rangers for the number of visitors.
- Some ATV/OHV/recreational shooters/other recreational users generate trash.

3.4.2.13.2 Undocumented Immigrants and Drug Smuggling

Planning Criteria

No issue-specific planning criteria have been identified for law enforcement regarding undocumented immigrants and drug smuggling.

Issues Overview

These comments address the negative impacts from vehicle tracks, litter, etc. resulting from undocumented immigrant and drug smuggling activity. They also object to the impacts from law enforcement driving cross-country.

Representative Comments

“I object to the restriction of law abiding public being restricted, for whatever reason, and illegal immigrants, law enforcement and administrative travel just tramples these same lands.” – Individual, Ajo, Arizona

“I strongly object to you allowing illegals to cross these lands, destroying resources and leaving their junk scattered on the desert.” – Individual, Ajo, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Address the trash left behind by undocumented immigrants and drug smugglers.

BLM Management Concerns

Concerns regarding undocumented immigrants and drug smuggling to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Undocumented immigrants and drug smugglers often drive vehicles off of roads, leave behind trash, and burn campfires. This has resulted in management concerns including resource damage (to soils, vegetation, wildlife habitat, cultural resources, etc.), unsanitary human waste disposal, costly clean-up of trash, and the potential for wildfire.
- Safety is another significant management concern. Undocumented immigrants are frequently ill-prepared for the harsh environmental and climatic conditions they encounter, particularly in the summer. This can result in the need for search and rescue operations. Recently, the illegal activities also have resulted in an increased concern for employee and visitor safety as drug smugglers and guides leading the undocumented immigrants (also known as coyotes) have been carrying and sometimes using lethal weapons.

Issues That Can Be Addressed Administratively

- Address the undocumented immigrants and drug smugglers and their impacts on the land.
- Address impacts of border law enforcement on the land.

3.4.2.14 Socioeconomics

Planning Criteria

The effects of proposed plan decisions will be evaluated for socioeconomic impacts. The impacts of decisions on disadvantaged communities will be evaluated, consistent with BLM's environmental justice policy.

Issues Overview

The comments received on socioeconomics varied widely consistent with the multiple uses that occur within the planning and decision area. The social attitudes and values are evident from the scoping meeting comment worksheet of what respondents listed as features or qualities they value about public lands (see Section 3.3.1). There were many general comments about population growth and the resulting development in the region. There were a number of local residents that noted that they moved to the area because of the desert environment and open space. Others noted the importance of tourism and winter residents to the economies of local communities. Some were opposed to actions that might support additional tourism. Often, these commenters noted the connection between these trends and the recreational opportunities and experience available to these users on BLM-administered public land and/or the impacts of these users on BLM-administered public land. Some noted the economic importance of outdoor recreation.

Several utility companies expressed concern for continued operation and future development. These included APS, TEP, as well as the CATS Committee, and Central Arizona Water Conservation District (the State of Arizona's entity responsible for operating and maintaining and repaying the Federal government for the CAP). These comments raised concerns that adjustments to rights-of-way or policy for new corridor developments would have potential negative impacts on utility companies as well as the services provided to the communities they serve. Specific to the SDNM, TEP raised concerns about impacts to their electrical facilities within the monument and requested a full identification of the social and economic impacts on all of the approved regional extra-high-voltage electric system components and

funding to develop alternatives to respond to any restrictions imposed on the utility. There also was a comment encouraging potential solar energy development in the area.

Economic impacts on adjacent lands and private landholders was raised as a concern and one comment stated that an economic impact analysis was necessary to consider potential impact on the value of private property. Other comments specifically related to the economic impact of mining and/or livestock grazing. Of these two, there were more comments related to livestock grazing, including that livestock grazing produces income and is a traditional way of life, that BLM grazing fees should be raised, that allotment holders should pay for range improvements, and that the land is marginal and not economically viable for livestock grazing.

Representative Comments

“Wildlife dependent outdoor recreation and associated uses represent a 1.5 billion dollar industry to the State of Arizona.” – Individual, Yuma, Arizona

“As soon as solar energy gets competition, set up solar energy collectors all over this useless land.” – Individual, Phoenix, Arizona

“We live in the west because of the abundance of open public lands for us to recreate on. We contribute significantly to local economies to support our pastime.” – Individual, Mesa, Arizona

“I hope you use the term ‘environment’ to mean the human environment and include all the conditions and circumstances that affect the welfare of the human species.” – Individual, Albuquerque, New Mexico

“I hate to see the over-grazing with the damage being done to the soil resource. This is not viable, economic, feasible grazing lands.” – Individual, Ajo, Arizona

“Cattle grazing, while economically marginal, has been a feature of Arizona land use for decades.” – Individual, Tempe, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Recognize how these lands contribute to the social and economic welfare of local residents and benefits help all Americans even those who do not visit there.
- Support wildlife-dependent recreation for its contribution to the economy.
- Examine the income-producing potential for ecotourism including nonconsumptive uses such as birding, nature interpretive hikes, Native history and culture, etc.
- Address how the influx of winter residents has changed social and economic conditions.
- Do not develop for tourism.
- Address potential impacts on utilities.
- Do not restrict existing electric energy distribution lines or prohibit new lines needed to enhance the southern Arizona electrical system because segments of existing extra-high-voltage lines are now within the designated SDNM; any potential restrictions could cost hundreds of millions of dollars.
- Provide for the establishment of solar energy collectors.

- Include a professional prepared economic impact analysis that considers the impact on the value of private property in and/or near the proposed action area.
- Recognize that mining and grazing contribute to Federal receipts and help reduce the financial burden of management.
- Livestock grazing is economically marginal, but is a traditional means of making a living.
- Limit range improvements and require the lessee to pay for them.
- Consider the effects of population growth and the resulting developments.

BLM Management Concerns

No management concerns to be addressed in the plan have been identified for socioeconomics that were not identified by the public or other agencies during scoping.

Issues That Will Not Be Addressed

- Include a full identification of the social and economic impacts on all of the approved regional extra-high-voltage electric system components.
Rationale: The RMP/EIS will evaluate economic impacts of the proposed action and alternatives, including those regarding corridors and rights-of-way, at a programmatic level as needed to assess the potential environmental impacts of each. There also will be an evaluation of cumulative impacts or the impacts of the proposed action and alternatives when combined with past, present, and reasonably foreseeable actions. A full social and economic impact analysis of the regional extra-high-voltage electric system components, however, is beyond the scope of this EIS.
- Increase grazing fees and use this money to hire more staff to study and protect the land. Grazing fees on BLM land lag far behind what the states charge and are only about 10 percent of what private landowners charge.
Rationale: BLM has no authority to adjust or change the grazing fee; it is set by a formula contained in law, as is the disposition of the fees collected.

3.4.2.15 Public Participation and Education

Planning Criteria

No additional, issue specific plan criteria have been identified

Issues Overview

As with the Phoenix South Planning Area, comments about public participation and education generally encouraged the BLM to provide means to incorporate them in the planning process and in management. There were slightly more comments for the SDNM regarding public participation and providing for scientific investigation and research at the monument. There were many who correlated the public's compliance with resource protection rules and regulations with the education program, particularly with regard to motorized vehicle travel. The more people are aware of what the regulations and policies are and/or of the impacts of inappropriate uses, the greater the compliance. Many of the comments on this topic pertain to ongoing BLM programs rather than strictly to the RMP/EIS process. There were some requests for providing better mapping of the transportation network to the public and some expressed interest in access to raw road inventory that may be used in the analysis of RMP/EIS alternatives. Another commenter suggested the establishment of committees to assist with the RMP/EIS process and as a means

of continued public involvement. There were several comments that pertained to coordination with educational institutions, researchers, and scientists.

Representative Comments

“The Society respectfully requests that a copy of the raw road inventory data performed by the Enterprise Group be provided for our review before being interpreted and summarized. We would gladly pay for the reproduction costs if necessary.” – Arizona Desert Bighorn Sheep Society

“Because inventory is so vital for sound management, perhaps BLM could seek the active participation of citizen volunteers in the process to enable progress during a period of frozen, or perhaps declining budget allocations. The agency has some volunteer opportunities advertised and some experience in this area, so it would seem that efforts to expand activities could be done with low cost (contact interested citizens from the existing mailing lists, interest groups by phone or e-mail for example) and with some real chance of success.” – Individual, Glendale, Arizona

“The natural and varied geological terrain offers both educational and recreational opportunities for future generations of citizens.” – WTCC

“Believe that explicit consideration of archaeological research and public education can only strengthen the planning effort and contribute to the BLMs ability to manage the Monument in the public interest. “
– Society for American Archaeology

“Continue to educate the public about off road driving.” – Individual, Gila Bend, Arizona

“Set up a committee for one of these, very important (the monument would have another set of committees) Set up another committee which oversees these committees. Committees comprised of maybe a rep from BLM, Fish and Game, public governors office, Sierra Club, etc.” – Individual, Casa Grande, Arizona

“Update roads in the area on your maps. It would give public better view of where they live in proximity.” – Individual, Maricopa, Arizona

“With 3 to 4 million people in the central area of the state, many wild lands tend to be invaded. An educational program for schools would help in adverting some of the problems.” – Individual, Phoenix, Arizona

“I would like the BLM to start educating hikers to go to a wilderness area to do their thing; they do nothing but create user conflicts with everyone else.” – Individual, Phoenix Arizona

“Showing the public a map of all the routes and asking them which ones they want open is not what the BLM is legally mandated to do.” – Arizona Wilderness Coalition

“I strongly urge you to see that the plan includes provisions for appropriated access to the Monument by qualified researchers and educators in a variety of fields of science and history. The SDNM was established under the Antiquities Act as an area having significant "historic and scientific" values. Both the Antiquities Act and the President's proclamation demonstrate that research and public education were important reasons for establishing the SDNM. These activities should be considered in managing it as well.” – Society for American Archaeology

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Consider education/outreach opportunities.
- Create an interpretive center/sites.
- Consider use of the public lands for scientific purposes and research.

BLM Management Concerns

Concerns regarding public participation and education to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Consider outreach programs that provide visitor information, including public safety, resource protection, and appropriate uses.

Issues That Can Be Addressed Administratively

- Establish various committees to address issues and uses for both the Phoenix South and SDNM.
- Teach those who want to use the land how to co-exist with plant and animal life.
- Do future scoping meetings in a question and answer forum so recreationists, environmentalists, ranchers, miners, etc. participate together and build trust among the groups.
- Consider an educational program for schools addressing how wild lands are being invaded.
- Continue to educate the public about off-road driving.
- Host a clean up day where the public can clean up some of the trash close to the freeway entrances to the monument such as Bighorn Turnoff and Mesquite Springs Turnoff.
- Provide for public review of the raw road inventory data prior to interpretation.

3.4.2.16 Cultural Resources

Planning Criteria

Cultural resources will be managed to maintain or enhance significant scientific, educational, cultural heritage, and other public values.

Cultural resources will be conserved and protected for future generations.

Cultural sites that meet National Register criteria will be protected and nominated for inclusion on the register.

Issues Overview

A considerable number of comments stated concern with the need to protect specific historic and prehistoric cultural resources within SDNM. Commenters single out a number of historic sites—including Big Horn Station, Papago Indian Chief Mine, and Tom Farley's cabin at Mesquite Well—among others as being worthy of restoration and/or interpretation. Many commenters regard protection of cultural resource sites as a high-priority management need.

Representative Comments

“I am of course most concerned about archaeological research and public education in the SDNM. It is essential that the Plans be structured to ensure that the American public continues to benefit from appropriate archaeological research and well-designed educational programs focused in the archaeology of the area.” – Society for American Archaeology

“BLM should survey all known or discoverable cultural and historic sites with SDNM or those sites outside SDNM that may be adversely affected.” – The Wilderness Society

“BLM must take decisive action to protect this American treasure. The monument was created solely for protection of its valuable natural and cultural features, not to provide recreation for the public.” – Sierra Club, Grand Canyon Chapter

“Because of their vulnerability and sensitivity to vandalism, first consideration for inventory efforts and highest priority for protection must be assigned to archaeological sites and resources.” – Individual, Glendale, Arizona

“I support protecting the Butterfield Pass because of its historical value.” Individual, Cave Creek, Arizona

“[I like to] visit the occasional mine or old homestead -- some of which need to be repaired/restored such as Big Horn and the Papago Indian Chief Mine. All need to be documented and monitored so they aren't damaged further by vandalism.” – Individual, Tucson, Arizona

“I value the precious and irreplaceable archaeological resources that are present throughout the southwest. I feel a serene "rootedness" in wild areas like the Maricopa and Sand Tank Mountains. .” – Individual, Tempe, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Preserve the natural history of the areas that are included in the national monument out of respect for the people that lived there once before.
- Consider interpretive center/sites for the monument (need for, location of, focus or, etc.).
- Protect Butterfield Pass because of its historical value.
- Inventory, repair, and restore historic areas such as Big Horn Station and the Papago Indian Chief Mine; monitor them to prevent vandalism.
- Restore the main house at Big Horn (the former Bender family home); it could be used as a small interpretive center with a campground.
- Repair and maintain Tom Farley's cabin at Mesquite Well; this sort of history is very appealing to visitors and teaches a great deal about the life of the SDNM.
- Mark Butterfield Trail, Mormon Battalion Trail, and other historical sites with interpretive signs.
- Use the RMP for the Escalante-Grand Staircase NM as a model; it includes research and education in archaeology and other fields as important management goals.
- Give priority to archaeological site protection because of their vulnerability and sensitivity to vandalism.
- Give high priority to repairing historical sites and protecting pre-historic sites.
- Maintain ancient cultural characteristics.

- Inventory and protect petroglyphs and historic pioneer sites.
- Preserve Native American cultural resources and life ways.

BLM Management Concerns

Concerns regarding cultural resources to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- BLM allocates cultural resources to scientific, traditional, public, experimental, preservation, and other uses. Define how sites or categories of sites are allocated to use categories, both for known sites and for future sites.
- Determine how scientific research should be appropriately managed on the monument.
- Determine how to effectively manage increasing cultural heritage tourism while protecting cultural resources.

Issues That Can Be Addressed Administratively

- Conduct an inventory to identify, locate, and evaluate cultural resources because without an accurate and complete resource database, even well intentioned actions may prove destructive. Seek citizen volunteers to help with the inventory if BLM's budget cannot accommodate the inventory.
- Do not publicize or mark Native American sites.

3.4.2.17 Native American Issues

Planning Criteria

No additional, issue specific plan criteria have been identified.

Issues Overview

As compared to the comments for the Phoenix South Planning Area, there were substantially more comments encouraging BLM to involve Native American communities in planning and management of SDNM than there was opposition to Native American involvement.

Representative Comments

“I think the plan should preserve Native American cultural resources and lifeways” – Individual, Phoenix, Arizona

“I do not encourage use of local tribes in planning and possibly management. The mind set of the Indians we have had to deal with is to bar entry and use of "their" land, except to those able to pay the highest dollar for permits.” – Individual, Oro Valley, Arizona

“Native peoples should have access for traditional uses regardless of other matters.” – Individual, Tucson, Arizona

“Management of this area is best done in collaboration with local Native American nations.” – Individual, Tempe, Arizona

“Local tribes should be consulted during planning and management phases of the national monument.”

–Individual, Phoenix, Arizona

“No one knows better than local tribes how to manage the land. Please get them involved.” – The Arizona Guide

“It is important for BLM to consider the input of the local Native American Tribes in planning the resource development of the monument.” – Individual, Phoenix, Arizona

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Consider whether there are potential conflicts between recreational uses and Native American traditional religious and cultural uses.
- Work closely with Native American communities who have prehistoric and historic ties to the area to ensure their values, sacred sites, and traditional activities are respected.
- Involve local tribes in planning and possibly management of BLM lands.

BLM Management Concerns

Concerns regarding Native American issues to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Consider decisions to protect areas with traditional cultural significance to Native American tribes.

Issues That Will Not Be Addressed

- Do not involve local tribes in planning and possibly management of BLM lands.
Rationale: The Federal government has a responsibility to consult with Native American tribes on potential decisions and actions on the public lands. In addition, all interested parties, including the tribes, are encouraged to take part in planning for the public lands.

Issues That Can Be Addressed Administratively

- Provide access to Native peoples for traditional uses regardless of other matters.
- Work closely with Native American communities who have prehistoric and historic ties to the area to ensure their values, sacred sites, and traditional activities are respected.
- Involve local tribes in planning and possibly management of BLM lands.

3.4.2.18 Public Health and Safety

Planning Criteria

The plan will develop a framework to protect public health and safety, including addressing hazardous sites and activities; incorporating requirements to meet the Clean Air Act, Clean Water Act, and other environmental laws and regulations; and considering other potential hazards.

In order to protect the public during operations at the adjacent Barry M. Goldwater Range, and to continue management practices that have resulted in an exceptionally well preserved natural resource, the current procedures for public access to the portion of the monument depicted as Area A will remain in full

force and effect, except to the extent that the Air Force agrees to different procedures that the BLM determines are compatible with the protection of resources and uses identified in the Presidential Proclamation.

The Air Force and BLM are developing a Memorandum of Understanding to address safe disposal of any unexploded ordnance discovered on monument lands relinquished from the Barry M. Goldwater Range (i.e., Area A of the monument).

Issues Overview

About a half dozen comments were received regarding public health and safety issues within the SDNM. Public health and safety concerns identified include fire management, drug smugglers and undocumented aliens, poor and unmaintained road conditions, the behavior of some ATV drivers, target shooting, and illegal dumping.

Representative Comments

"Fire management in the SDNM is an important issue that should be dealt with through the application of the best available science to protect the long-term public welfare and health and integrity of the ecological landscape." – The Wilderness Society

"It is very evident that foot traffic from border crossers, drug and migrant smuggling activity and related activities of the US Border Patrol pose significant threats to the monument, endangering not only plants, animals and other monument resources, but also threatening the lives and safety of those who live and work on the monument." – Sierra Club Grand Canyon Chapter, Phoenix, Arizona (letter 3 of 3)

"On going maintenance is required as well as upgrades and operational improvements to continue to provide the public with the safe and efficient transportation system that has been developed with public funding and support." –Individual, unspecified community

"Although they [ATV drivers] have a right to use and enjoy them, they should also accept a responsibility not only for safe driving, but for the ecosystems that they are driving over." – Individual, Kern, California

"Target shooting (but not hunting) needs to be phased out due to damage to resources, intrusion on other recreationists because of noise or danger, and population growth. (Shooters have many established shooting ranges available.)" – Individual, Phoenix, Arizona

"Random target shooting, illegal dumping and drug smuggling threatens the safety of residents, visitors, private property and wildlife." – Sierra Club Grand Canyon Chapter, Phoenix, Arizona (letter 1 of 3)

Issues to be Used in the Development and Analysis of EIS Alternatives

Public Issues

- Fire management must be designed to protect public welfare.
- Monument roads should be maintained, upgraded, and improved as necessary to provide the public with a safe and efficient transportation system.
- ATVs must be driven in a responsible manner so as not to endanger public safety.
- Random target shooting may threaten the safety of monument visitors and nearby residents.
- Illegal dumping may threaten the safety of monument visitors and nearby residents.

- Drug smugglers may threaten the safety of monument visitors and nearby residents.

BLM Management Concerns

Concerns regarding public health and safety to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Identify and consider safety issues at historic mine sites, which are often popular visitor destinations.
- Determine which uses are incompatible due to public safety issues. Target shooting, for example, is a legitimate public lands use but may place nonparticipants at risk, particularly in areas of heavy use.
- Consider the increasing concern regarding undocumented immigrant traffic and smuggling activities on the public lands relative to public and employee safety.
- Determine what level of maintenance should be provided on roads to maintain access and to protect both public safety and natural and cultural resources.
- Consider appropriate management of sites and areas that pose a threat to public health and safety, whether man-made or natural.

3.5 DECISIONS ANTICIPATED TO BE MADE

In accordance with the FLPMA, BLM is responsible for balanced management of public land and its resources based on the principles of multiple use and sustained yield. Management direction is provided by land use plans, in this case RMPs, which are developed to determine decisions regarding appropriate multiple uses and allocation of resources, develop strategy to manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices over time. Also, the management direction developed through the planning process needs to be adaptable to changing conditions and demands over the life of the RMPs. Development of the RMPs will be in accordance with the guidance set forth in *BLM H-1601-1 – Land Use Planning Handbook*.

The SDNM planning process also must take into consideration the Presidential Proclamation, which defines for SDNM “objects of scientific and historic interest” that must be protected and lists actions needed to protect SDNM resources. It also reserves all federal lands within the boundaries and withdraws all lands in SDNM from disposal under public land laws and continues many current uses and authorities.

In anticipation of this planning process, BLM developed an initial list of questions that reflect the kinds of decisions that will need to be made. This list of planning questions can be found in BLM PFO’s Preparation Plan for the Phoenix South and SDNM dated August 15, 2002, which is available for review at the PFO.

3.6 EXISTING MANAGEMENT TO BE CARRIED FORWARD

BLM-administered public land in the planning area is managed with direction from three existing land use plans: parts of the Lower Gila North Management Framework Plan completed in 1983, Lower Gila South RMP completed in 1988, and Phoenix Resource Area RMP completed in 1989. Since these land use plans were implemented 14, 15, and 20 years ago, respectively, numerous changes have occurred in the area that require reconsideration of certain management decisions. BLM has determined that some of the existing management decisions are not current with changing circumstances, demographics, resource conditions, and/or policy. In addition, changing emphasis on fire management, noxious weed management, energy production and transport, and increasing urbanization and the consequent urban-

rural interface result in the need to consolidate, revise, and update the Phoenix South RMP. Also, the designation of the SDNM necessitates the development of an RMP specific to management of the monument.

However, time and experience have demonstrated that many elements of the existing plans work well and remain valid, and it is BLM's intent to carry these management decisions forward. Determining which existing management decisions will be carried forward is a part of the planning process. As part of an Analysis of the Management Situation, BLM will review the existing condition of the environment, review the existing management situation, and identify which existing management decisions should be carried forward and where there are opportunities to modify existing management direction and/or develop new management direction.

4.0 DATA SUMMARY

To begin preparing for the development of the RMPs/EIS, BLM PFO organized and reviewed its database to determine the existing data available for the studies and analyses, and to identify the data needed (Tables 4-1 and 4-2). Much of the data for this planning effort is in a geographic information system (GIS) format, which is a software application used to analyze data spatially. The review indicated that BLM PFO had approximately 50 percent of the data needed for the RMPs/EIS, and some of the existing data would need to be updated. BLM then developed a plan to obtain the remaining data needed.

Considering BLM management concerns and a preliminary understanding of the issues associated with the Phoenix South Planning Area and SDNM, BLM identified and initiated seven studies that would be needed to complete the RMPs/EIS. It is anticipated that these studies will be completed in Fall 2003. These studies are as follows:

- Inventory of roads and trails
- Social and economic conditions baseline, including trend documentation by community
- Model to predict areas of urban growth
- Prehistoric and historic cultural resource overview
- Inventory of recreation/human impact on the SDNM
- Inventory of wilderness character
- Assessment of public land health in accordance with the *Arizona Standards for Public Land Health and Guidelines for Livestock Grazing Management Statewide RMP Amendment/EIS*.

Route analysis to determine road designations (i.e., open, closed) will be based on the route inventory and will be completed in parallel with alternatives development.

With an understanding of the issues that resulted from scoping, BLM again reviewed the database to determine the data that would be needed to adequately address the issues and management concerns. Data needed, aside from the studies listed above, could be collected from other agencies and organizations during an early stage of the planning process. A summary of the data to be collected and potential sources of the data are provided below by resource.

Lands and Realty - Information to identify and map existing and planned utility corridors and other rights-of-way (e.g., communication sites, renewable energy sites) will be obtained from county databases, local communities, utility and telecommunication companies operating in the region, as well as organizations such as the Western Utility Group (Western Regional Corridor Study).

Soils - Soils data will be obtained from the Arizona Statewide Survey (a scale of 1:250,000) and from Natural Resources Conservation Service (NRCS).

Groundwater Resources - Groundwater data will be obtained from the Arizona Department of Water Resources.

Air Quality - Sources of data will include but not be limited to state- and county-operated ambient air quality monitoring stations, assessments of air quality trends in the Phoenix airshed and surrounding areas, visibility and haze monitoring in Class I areas (Superstition Wilderness, Saguaro National Park – North), State Implementation Plan Emission Inventories, Growth Plans and Non-attainment area progress

reports, and other published reports. As needed, data characterizing emission sources will be gathered from permitting agencies (Maricopa, Pinal, Pima, Gila, and Yuma counties, and the Arizona Department of Environmental Quality), or planning authorities (e.g., Maricopa Association of Governments).

Energy and Mineral Resources - Data for solar and wind energy resources will be obtained from the National Renewable Energy Laboratory web site. Data to develop the mineral resources assessments will be obtained primarily from materials gathered by BLM including the BLM *Land and Mineral Records LR2000* database. Information also will be obtained through literature reviews, industry contacts, and scout report databases. State and Federal agencies, including the U.S. Geological Survey (USGS), Arizona Geological Survey, Arizona Department of Mines and Mineral Resources, and Arizona Oil and Gas Conservation Commission also will provide information on historical interests, such as mining districts and current resource developments.

Wildlife and Threatened and Endangered Species - Wildlife and threatened and endangered species distributions will be obtained from USFWS and AGFD.

Land Uses - Existing and planned land use information will be based on and compiled from county plans (primarily Maricopa, Pinal, and Pima) and local communities, and discussions with major developers.

Hazardous Materials - Data and information pertaining to hazardous material and/or waste sites will be obtained from local organizations that manage site databases (e.g., Environmental Data Resources).

Table 4-1. GIS Data Inventory

Theme Category and Description	Coverage or Shape File Name	FGDC metadata?	Data Standard	Notes
Areas of Critical Environmental Concern				
ACECs	Shape file - acec_p.shp	Yes	BLM	In GIS database PFO, compiled at a scale of 1:24,000
Base Data				
County boundaries	Coverage - countybnd_l countybnd_p	Yes	Arizona Land and Resource Information System (ALRIS)	In GIS database - compiled by ALRIS at 1:100,000
Field Office boundaries	Coverage - azfobdy_p	Yes	BLM	In GIS database - Compiled at BLM Arizona State Office at 1:500,000, revised for PFO at 1:100,000
Geographic place names	Coverage - az_ppl_utm	Yes	To be determined (TBD)	In GIS database - not the 1:24,000 quad place names
Indian reservation boundaries	Coverage - landstatus	Yes	ALRIS	In GIS database - compiled at 1:100,000 by ALRIS in 1994, maintained and revised in 2001
National Park/Monument boundaries	Coverage - landstatus	Yes	ALRIS	In GIS database - compiled at 1:100,000 by ALRIS in 1994, maintained and revised in 2001
State boundaries	Coverage - az	Yes	TBD	In GIS database - compiled from other data at 1:100,000
Town locations	Coverage - towns	Yes	ALRIS	In GIS database - compiled by ALRIS at 1:100,000
Forest Service boundaries	Coverage - landstatus	Yes	ALRIS	In GIS database - compiled at 1:100,000 by ALRIS in 1994, maintained and revised in 2001
Cultural				
Cultural sites	Spatial Database Engine database - azsite	Not applicable (NA)	State Historic Preservation Office (SHPO)	Data managed by SHPO - addressed some in "GIS Strategy" table
Fire				
Prescribed burn blocks	Coverage - firepres_p	Yes – with amendment	TBD	In GIS database - compiled at 1:24,000 - data are primarily in Agua Fria National Monument and vicinity
Fire management polygons	Coverage - azfzm_p	Yes – with amendment	TBD	In GIS database - compiled at 1:100,000
National Fire Danger Rating System fuel models	Shape file - azfuels-nfdrs-gap.shp	Yes – with amendment	TBD	In GIS database - aggregated vegetation communities from Gap Analysis Program (GAP); vegetation classification, re-attributed as National Fire Danger

Table 4-1. GIS Data Inventory

Theme Category and Description	Coverage or Shape File Name	FGDC metadata?	Data Standard	Notes
				Rating System fuel types
National Forest Fire Laboratory fuel models	Shape file - azfuels-nfl-gap.shp	Yes – with amendment	TBD	In GIS database - aggregated vegetation communities from GAP vegetation classification, re-attributed as National Forest Fire Laboratory fuel types
Geology				
Surface geology	Coverage - geology_p	Yes	TBD	In GIS database - Compiled at 1:1,000,000, may not be adequate for this planning effort
Fault lines	Coverage - faults_l	Yes	TBD	In GIS database - Compiled at unknown scale, may be adequate if needed
Mineral Potential	Coverage - minerals_p	Yes	ALRIS	In GIS database - From ALRIS database, source unknown, may not be adequate for plan, addressed in GIS strategy table
Hydrography				
Hydrography - line (streams)	Coverages - hydroper_l, hydroint_l	Yes	ALRIS	In GIS database - compiled by ALRIS at 1:100,000
Hydrography - point (springs)	Coverage - azsprings_x	Yes	ALRIS	In GIS database - compiled by ALRIS at 1:100,000, incomplete
Hydrography - polygon (lakes)	Coverage - lakes_p	Yes	ALRIS	In GIS database - compiled by ALRIS at 1:100,000
Riparian inventory	Coverage - riparian_l Shape file - az-pfc.shp	Yes	BLM	In GIS database - compiled at 1:24,000 from BLM inventory data
Hydrologic Units - 4 th order	Coverage - hucls_p	Yes	NRCS	In GIS database - 5 th order being compiled by NRCS, expected completion September 2001
Lands				
Land status - surface	Coverage - landstatus	Yes	BLM	In GIS database - compiled and maintained at 1:100,000
Potential land disposals	Coverage - disposition	Yes	BLM	In GIS database - data reflects disposal decisions from previous planning documents, compiled with polygons from land status coverage
Public Land Survey System				
Geographic Coordinate Data Base (GCDB)	Various - named by township and range	Yes	GCDB	Most townships completed and available from BLM Arizona State Office
Sections	Coverage - sectplss_p Shape file - trs.shp	Yes	ALRIS	Available data compiled by ALRIS from 1:100,000 data, should be adequate for planning
Townships	Coverage - trplss_p Shape file - trs.shp	Yes	ALRIS	Available data compiled by ALRIS from 1:100,000 data, should be adequate for planning

Table 4-1. GIS Data Inventory

Theme Category and Description	Coverage or Shape File Name	FGDC metadata?	Data Standard	Notes
Range				
Grazing allotments	Coverage - allotments_p pastallot_p	Yes	BLM	In GIS database - compiled at 1:24,000
Range improvement polygons	Coverage - rangeimp_p	Yes	BLM	In GIS database - compiled at 1:24,000, contains a couple of enclosures
Range improvement lines	Coverage - rangeimp_l	Yes	BLM	In GIS database - compiled at 1:24,000, needs to be compared with pasture and allotment boundaries in allotment_p and pastallot_p
Range improvement points	Coverage - rangeimp_x	Yes	BLM	In GIS database - compiled at 1:24,000, does not contain all improvements
Wild burro management areas	Coverage - azbup_p	Yes	BLM	In GIS database - compiled at 1:100,000
Recreation				
Off-highway vehicle designation areas	Coverage - ohvclass_p	Yes	BLM	In GIS database - compiled at 1:100,000 with 1:24,000 wilderness and ACEC boundaries patched in
Recreation facilities (developed sites)	Coverage - rectfac_x	Yes	BLM	In GIS database - contains trailheads in this planning area
Recreation trails	Coverage - trails_l	Yes	BLM	In GIS database - contains recognized non-motorized trails
Off-highway vehicle routes		Yes	Enterprise Team	Inventory underway
Visual Resource Management classes	Coverage - vrmclass_p	Yes	BLM	In GIS database at 1:100,000
Recreation Opportunity Spectrum classification	Coverage - ros_p	Yes	BLM	In GIS database at 1:100,000
Dispersed recreation sites		In progress	TBD	In progress for SDNM
Wild and scenic river recommendations	Shape file - w&s_rivers	Yes	BLM	In GIS database - compiled at 1:24,000
Soils				
Soils (SSURGO)	Coverage - soils-645_p, also 651,653,655,659	May be incomplete	NRCS	In GIS database
Transportation				
Roads	Coverage - class1rds_l - Interstates class2rds_l - State and Federal Highways class3rds_l - County Connectors & Major Streets class4rds_l - City streets and	May be incomplete, but will be replaced by new ALRIS data with metadata	ALRIS	In GIS database - compiled by ALRIS at 1:100,000. (Some may have been acquired from USGS 1:100,000 DLG or from TIGER)

Table 4-1. GIS Data Inventory

Theme Category and Description	Coverage or Shape File Name	FGDC metadata?	Data Standard	Notes
	country roads class5rds_1 - Jeep trails class6rds_1 - Interchanges and overpasses class7rds_1 - trails tigrails_1 - railroads	Yes	Enterprise Team	In progress for SDNM and Ajo Block
Route inventory				
Vegetation				
Vegetation	Coverage - azgapveg99_p	Yes	GAP	In GIS database - acquired at ~1:24,000 by GAP project, may require some adjustment
Natural communities		In progress	TBD	In progress
Wilderness				
Wilderness areas	Coverage - wilderness_p	Yes	BLM	In GIS Database - compiled at 1:24,000 with boundary segment definitions
Wilderness character		In progress	BLM	In progress
Wildlife				
Bighorn sheep habitat	Coverage - bhshab_p	Yes	BLM	Compiled at 1:100,000 by BLM
Special Status Species				
Desert tortoise habitat	Coverage - aztort_p	Yes	BLM	In GIS database - compiled at 1:100,000
Cactus ferruginous pygmy-owl proposed critical habitat		TBD	USFWS	
Sonoran pronghorn distribution		TBD	USFWS	

SOURCE: Bureau of Land Management 2002

NOTES:

- 1) New ALRIS data recently have been received and are being processed. Some coverage or shape-file names may have changed and additional data may be available. BLM data are UTM 12, NAD27, with a plan to change to NAD83 in the near future. All data in this table have Federal Geographic Data Committee (FGDC) metadata completed or nearly completed except as noted.
- 2) This table is a preliminary list of available GIS themes, based on the issues identified at this time. An explanation is given for each theme explaining, to the best of BLM PFO's knowledge, the data currently in BLM PFO's GIS database, or where the needed data can be located.

Table 4-2. Data and GIS Needs

Planning Question	Data Set	Is data set available?	Work Needed to Obtain/Prepare Data	FGDC metadata available?	Name and source of data standard?	Does available data meet existing standard?
Is grazing consistent with protecting monument resources? What land health standards should be set? What is needed to protect and/or restore vegetation?	Grazing study; Ecological Site Inventory (ESI) Land health standards underway	Yes, ESI not spatial In progress	In-house using Arizona methodology	Nonspatial, documentation needed Will be developed	BLM data standard	Not applicable (NA)
How does the monument fit into the landscape of the Sonoran Desert? How can natural communities, species, and connectivity of the landscape be protected?	AGFD, USFWS, BLM data Natural community map, species data, monitoring	Yes In progress	Cooperative agreement with The Nature Conservancy to gather biological data	In progress	TBD	NA
What are community and public priorities for managing the public lands? How can public needs be incorporated into the plan?	Public preference data Socioeconomic data (nonspatial)	No Partial	Public meetings Cooperative agreement with Sonoran Institute to gather data – Economic Profile System (EPS)	Will be developed Nonspatial, documentation needed	Sonoran Institute standard	NA
What are industry's needs for utility corridors and communication sites?	Utility corridor study Communication site study	No No	Request data from industry and government	To be determined (TBD)	TBD	NA
What key cultural resources are on the public lands and what is their status, protection needs?	Class I Cultural inventory, will include spatial and nonspatial	In progress	Contract	Will be developed	SHPO data standard	Yes
What are the mineral material needs and preferred locations?	Mineral occurrence and reasonable foreseeable development	Partial – geology maps and other sources	Request from industry/government	Yes – geology; TBD – industry	Arizona Geological Survey	Yes

Table 4-2. Data and GIS Needs

Planning Question	Data Set	Is data set available?	Work Needed to Obtain/Prepare Data	FGDC metadata available?	Name and source of data standard?	Does available data meet existing standard?
What are the acquisition, disposal, and exchange needs?	Surface and subsurface ownership	Yes	In house	Yes	BLM data standard	Yes
How will proposed management actions affect air quality?	Air quality analysis	No	TBD – contract	Will be developed	TBD	NA
What is the status of threatened & endangered species? What is needed to protect them?	Various data in house and partners	Some	In-house, partners	TBD – yes for in house	BLM or AGFD standard	Yes
What actions are necessary to implement the Sonoran pronghorn recovery plan?	Various data – USFWS, AGFD, BLM	Some	In-house, request from partners	TBD – yes for in house	BLM or AGFD standard	NA
What management actions are need to manage for wildlife	Various, spatial and nonspatial	Some – BLM and AGFD	In-house, request from AGFD	TBD – yes for in house	BLM or AGFD standard	TBD
What route designations are required, especially in SDNM, Ajo (Sonoran pronghorn), and Saddle Mountain?	Route inventory, photo interpretation	Partial, need additional areas	Contract/in-house	Yes	Enterprise team standard	Yes
What are the priorities for recreation? What areas have high value recreation and visual resources?	-Recreation Opportunity Spectrum (ROS) -Visual Resource Management -dispersed site survey	-ROS needs update; -VRM needs update; -In progress	-Contract, in-house -Contract, in-house -Contract	-Yes -Yes -Will be developed	BLM data standard	Yes
Which areas have wilderness characteristics? How should these areas be managed?	Wilderness Character Inventory and assessment	In-progress	In-house	Yes	BLM data standard	Yes
What are the water resources in previously uninventoried areas (Area A and Sentinel Plains)? How should these be managed?	Water resource assessment	Partial; data may be available from U.S. Air Force	Acquire from U.S. Air Force	TBD	TBD	Yes

SOURCE: Bureau of Land Management 2002

NOTES: This table reflects only the data that have been identified to date that need to be collected, obtained, or updated. Existing base data are listed in Table 4-1. Most of the data needed were collected when the Lower Gila RMP Amendment was developed in the mid 1990s; however, some updates are needed, some new issues have arisen, and the SDNM designation requires some additional decisions, especially regarding protection of natural and cultural resources. Existing base data are compliant with FGDC metadata. All new data will be FGDC compliant.

5.0 SUMMARY OF FUTURE STEPS

BLM's planning process employs nine basic steps, which are listed below and described in the planning regulations (Manual 1617, Section 42):

- identification of issues
- development of planning criteria
- data and information collection
- management situation analysis
- formulation of alternatives
- estimation of effects of the alternatives
- selection of the preferred alternative(s)
- selection of the plan
- monitoring and evaluation

The process requires the use of an interdisciplinary team of resource specialists to complete each step. An important part of the BLM's planning process is to develop RMPs that will have community and political support. To achieve this, BLM is committed to continuing to engage the public and relevant agencies in a planning process. Land use planning often provides the catalyst for bringing communities, agencies, other groups, and individuals together to reach mutually beneficial goals. Over the past few years, BLM has incorporated collaborative approaches to planning and land stewardship projects. A collaborative approach to planning entails BLM working together with Tribal, State, and local governments; other Federal agencies; and interested organizations and individuals, from the earliest stages of, throughout, and beyond the planning process to address common needs and goals within the planning area. Collaboration increases community involvement with and support for management decisions and implementation – it establishes a long-term commitment by the participants for a shared responsibility and stewardship for the land.

Identification of Issues - Issues were identified through the scoping process, which initiated the planning process. The scoping process and the issues identified are documented in this Scoping Report.

Development of Planning Criteria - Planning criteria establish constraints and guidelines for the planning process; establish standards, rules, and measures; set the scope of inventory and data collection; help identify the range of alternatives; and estimate the extent of analysis. Based on the issues identified and on BLM management concerns, BLM drafted the planning criteria as described in Section 2.0 of this document. These planning criteria will be distributed to the public for review in Fall 2003. After a 30-day comment period, comments received from the public will be incorporated, and the planning criteria will then guide the development of the RMPs/EIS.

Data and Information Collection - As explained in Section 4.0, much of the data and information will be extracted and used from existing data on file at the BLM PFO. Other data and information will be obtained from current studies being conducted by BLM and through relevant sources to update and/or supplement the BLM's data. Data includes published and unpublished reports, maps, and digital format (GIS). Generally, the resources and resource uses to be addressed include the following:

- land (tenure) and real estate
- geology
- soils
- water resources
- air quality
- vegetation
- wildlife
- special status species
- grazing
- noxious weeds
- wild and free-roaming horses and burros
- cultural resources
- paleontological resources
- recreation
- visual resources
- special management areas
- social and economic conditions
- fire management
- public health and safety

Analysis of the Management Situation - The purpose of the Analysis of the Management Situation is to conduct a deliberate assessment of the current situation in the planning area. The documentation is a compilation of information appropriate and commensurate with the planning issues. The Analysis of the Management Situation provides a profile of the existing condition of the environment, description of the existing management (e.g., laws, regulations, policies, management direction), and analysis of opportunities to continue or modify the existing management situation.

Formulation of Alternatives - BLM, in collaboration with relevant agencies and the public, will develop a range of reasonable alternatives (i.e., combinations of management strategies) to the existing management situation that address the issues identified during scoping, comply with BLM's planning regulations and policies, comply with the FLPMA requirement of managing for sustained yield and multiple use, and comply with other laws and regulations. Also, an alternative for no action will be addressed. The No-action Alternative assumes that existing management will continue.

This is the most prominent milestone task for collaboration and public participation. Because the development of alternatives is a critical step for which careful and thorough collaborative planning is needed, several public workshops will be scheduled to discuss the alternatives for the planning area. The meetings will be informal, open house meetings with the public, interested organizations, and agencies. Following approval of the alternatives by the BLM Arizona State Director, additional public meetings will be held to present and explain the alternatives to the public.

Estimation of Effects of the Alternatives - BLM will then assess the potential impacts of the plan alternatives.

Selection of the Preferred Alternative - Based on the information generated in the previous step, the Phoenix Field Manager will identify and recommend a preferred alternative to the BLM Arizona State Director. The Draft RMPs/EIS will be prepared and distributed to the public for review and comment for a period of 90 days. Public meetings will be scheduled during the comment period. The availability of the Draft RMPs/EIS and public meetings will be announced via *Federal Register*, media, planning bulletin, and on the web site.

Selection of the Plan - Based on the results and thorough consideration of the public and agency comments on the Draft RMPs/EIS, the Phoenix Field Manager will recommend to the BLM Arizona State Director the Proposed RMPs and publish the RMPs along with the Final EIS. A final decision will be made after a 60-day Governor's Consistency Review and simultaneous 30-day protest period. Records of Decision and approved RMPs then will be published. The availability of the Proposed RMPs/Final EIS will be announced via *Federal Register*, media, planning bulletin, and on the web site.

Monitoring and Evaluation - Over time, BLM will monitor and evaluate actions, resource conditions, and trends to determine the effectiveness of the RMPs and to ensure that implementation of the RMPs is achieving the desired results. The RMPs will be kept current through minor maintenance, amendments, or revisions as demands on resources change, as the resources change, or as new information is acquired.

SECTION 6.0 REFERENCES

Bureau of Land Management (BLM) 2002. Land Use Planning Handbook. BLM Handbook H-1601-1. August 22 release

APPENDIX A

PRESIDENTIAL PROCLAMATION

Proclamation 7397 of January 17, 2001

ESTABLISHMENT OF THE SONORAN DESERT NATIONAL MONUMENT

By the President of the United States of America

A Proclamation

The Sonoran Desert National Monument is a magnificent example of untrammeled Sonoran desert landscape. The area encompasses a functioning desert ecosystem with an extraordinary array of biological, scientific, and historic resources. The most biologically diverse of the North American deserts, the Monument consists of distinct mountain ranges separated by wide valleys, and includes large saguaro cactus forest communities that provide excellent habitat for a wide range of wildlife species.

The Monument's biological resources include a spectacular diversity of plant and animal species. The higher peaks include unique woodland assemblages, while the lower elevation lands offer one of the most structurally complex examples of palo verde/mixed cacti association in the Sonoran Desert. The dense stands of leguminous trees and cacti are dominated by saguaros, palo verde trees, ironwood, prickly pear, and cholla. Important natural water holes, known as tinajas, exist throughout the Monument. The endangered acuna pineapple cactus is also found in the Monument.

The most striking aspect of the plant communities within the Monument are the abundant saguaro cactus forests. The saguaro is a signature plant of the Sonoran Desert. Individual saguaro plants are indeed magnificent, but a forest of these plants, together with the wide variety of trees, shrubs, and herbaceous plants that make up the forest community, is an impressive site to behold. The saguaro cactus forests within the Monument are a national treasure, rivaling those within the Saguaro National Park.

The rich diversity, density, and distribution of plants in the Sand Tank Mountains area of the Monument is especially striking and can be attributed to the management regime in place since the area was withdrawn for military purposes in 1941. In particular, while some public access to the area is allowed, no livestock grazing has occurred for nearly 50 years. To extend the extraordinary diversity and overall ecological health of the Sand Tank Mountains area, land adjacent and with biological resources similar to the area withdrawn for military purposes should be subject to a similar management regime to the fullest extent possible.

The Monument contains an abundance of packrat middens, allowing for scientific analysis of plant species and climates in past eras. Scientific analysis of the midden shows that the area received far more precipitation 20,000 years ago, and slowly became more arid. Vegetation for the area changed from juniper-oak-pinon pine woodland to the vegetation found today in the Sonoran Desert, although a few plants from the more mesic period, including the Kola Mountain barberry, Arizona rosewood, and junipers, remain on higher elevations of north-facing slopes.

The lower elevations and flatter areas of the Monument contain the creosote-bursage plant community. This plant community thrives in the open expanses between the mountain ranges, and connects the other plant communities together. Rare patches of desert grassland can also be found throughout the Monument, especially in the Sand Tank Mountains. The washes in the area support a much denser vegetation community than the surrounding desert, including mesquite, ironwood, paloverde, desert honeysuckle, chuperosa, and desert willow, as well as a variety of herbaceous plants. This vegetation offers the dense cover bird species need for successful nesting, foraging, and escape, and birds heavily use the washes during migration.

The diverse plant communities present in the Monument support a wide variety of wildlife, including the endangered Sonoran pronghorn, a robust population of desert bighorn sheep, especially in the Maricopa Mountains area, and other mammalian species such as mule deer, javelina, mountain lion, gray fox, and bobcat. Bat species within the Monument include the endangered lesser long-nosed bat, the California leaf-nosed bat, and the cave myotis. Over 200 species of birds are found in the Monument, including 59 species known to nest in the Vekol Valley area. Numerous species of raptors and owls inhabit the Monument, including the elf owl and the western screech owl. The Monument also supports a diverse array of reptiles and amphibians, including the Sonoran desert tortoise and the red-backed whiptail. The Bureau of Land Management has designated approximately 25,000 acres of land in the Maricopa Mountains area as critical habitat for the desert tortoise. The Vekol Valley and Sand Tank Mountains contain especially diverse and robust populations of amphibians. During summer rainfall events, thousands of Sonoran green toads in the Vekol Valley can be heard moving around and calling out.

The Monument also contains many significant archaeological and historic sites, including rock art sites, lithic quarries, and scattered artifacts. Vekol Wash is believed to have been an important prehistoric travel and trade corridor between the Hohokam and tribes located in what is now Mexico. Signs of large villages and permanent habitat sites occur throughout the area, and particularly along the bajadas of the Table Top Mountains. Occupants of these villages were the ancestors of today's O'odham, Quechan, Cocopah, Maricopa, and other tribes. The Monument also contains a much used trail corridor 23 miles long in which are found remnants of several important historic trails, including the Juan Bautista de Anza National Historic Trail, the Mormon Battalion Trail, and the Butterfield Overland Stage Route.

Section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431), authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Government of the United States to be national Monuments, and to reserve as a part thereof parcels of land, the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected.

WHEREAS, it appears that it would be in the public interest to reserve such lands as a national Monument to be known as the Sonoran Desert National Monument.

NOW, THEREFORE, I, WILLIAM J. CLINTON, President of the United States of America, by the authority vested in me by section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431), do proclaim that there are hereby set apart and reserved as the Sonoran Desert National Monument, for the purpose of protecting the objects identified above, all lands and interest in lands owned or controlled by the United States within the boundaries of the area described on the map entitled "Sonoran Desert National Monument" attached to and forming a part of this proclamation. The Federal land and interests in land reserved consist of approximately 486,149 acres, which is the smallest area compatible with the proper care and management of the objects to be protected.

For the purpose of protecting the objects identified above, all motorized and mechanized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes.

Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Arizona with respect to fish and wildlife management.

The establishment of this Monument is subject to valid existing rights.

All Federal lands and interests in lands within the boundaries of this Monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the Monument. Lands and interests in lands within the Monument not owned by the United States shall be reserved as a part of the Monument upon acquisition of title thereto by the United States.

This proclamation does not reserve water as a matter of Federal law nor relinquish any water rights held by the Federal Government existing on this date. The Federal land management agencies shall work with appropriate State authorities to ensure that water resources needed for Monument purposes are available.

The Secretary of the Interior shall manage the Monument through the Bureau of Land Management, pursuant to applicable legal authorities, to implement the purposes of this proclamation. That portion identified as Area A on the map, however, shall be managed under the management arrangement established by section 3 of Public Law No. 99-606, 100 Stat. 3460-61, until November 6, 2001, at which time, pursuant to section 5(a) of Public Law No. 99-606, 100 Stat. 3462-63, the military withdrawal terminates. At that time, the Secretary of the Interior shall assume management responsibility for Area A through the Bureau of Land Management.

The Secretary of the Interior shall prepare a management plan that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in this proclamation. Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument; provided, however, that grazing permits on Federal lands within the Monument south of Interstate Highway 8 shall not be renewed at the end of their current term; and provided further, that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.

Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the national Monument shall be the dominant reservation.

Nothing in this proclamation shall preclude low level overflights of military aircraft, the designation of new units of special use airspace, or the use or establishment of military flight training routes over the lands included in this proclamation.

In order to protect the public during operations at the adjacent Barry M. Goldwater Range, and to continue management practices that have resulted in an exceptionally well preserved natural resource, the current procedures for public access to the portion of the Monument depicted as Area A on the attached map shall remain in full force and effect, except to the extent that the United States Air Force agrees to different procedures which the Bureau of Land Management determines are compatible with the protection of the objects identified in this proclamation.

Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of this Monument and not to locate or settle upon any of the lands thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this seventeenth day of January, in the year of our Lord two thousand one, and of the Independence of the United States of America the two hundred and twenty-fifth.

WILLIAM J. CLINTON