PROPOSED PHOENIX RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

NOTICE

This is a Proposed Resource Management Plan and Final Environmental Impact Statement for the Phoenix Resource Area, Phoenix District, Arizona. The Proposed RMP/FEIS was prepared by an interdisciplinary planning team and approved by the BLM's Phoenix District Manager and Arizona State Director. Only those portions of the draft RMP/EIS necessary for text continuity and/or required by regulations are reprinted here. A limited number of copies of the draft Phoenix RMP/EIS and this proposed RMP/FEIS are available from the

Phoenix Resource Area
2015 West Deer Valley Road
Phoenix, AZ 85027.

Telephone requests
will be accepted at
(602) 863-4464

PROPOSED
PHOENIX
RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

DECEMBER 1988

U.S. Department of the Interior
Bureau of Land Management
Phoenix District · Arizona

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Phoenix District Office
2015 West Deer Valley Road
Phoenix, Arizona 85027

TAKE PRIDE IN AMERICA

IN REPLY REFER TO

Dear Reader:

The document accompanying this letter is the Proposed Phoenix Resource Management Plan and Final Environmental Impact Statement (RMP/FEIS). This FEIS analyzes the impacts expected from implementing the Proposed Phoenix RMP. The plan, if approved, will guide the BLM in its management of the Phoenix Resource Area, covering all or parts of eight Arizona counties.

The Proposed Phoenix RMP is a modified version of the preferred alternative analyzed in the Draft Phoenix RMP/EIS published in December 1987.

Any participant in this planning effort who has an interest which is or may be adversely affected by the approval of the Proposed Phoenix RMP, or any part of it, may protest such approval. The protest may raise only those issues which were submitted for the record during the planning process.

Protests must be in writing and filed with the Director (760), Bureau of Land Management, Room 909, Premier Building, 18th and C Streets NW, Washington D.C. 20240, by the date stamped on the title page following this letter.

Protests must include the following information: 1) The name, mailing address, telephone number and interest of the person filing the protest; 2) A statement of the issue or issues being protested; 3) A statement of the part or parts of the plan being protested; 4) A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record; 5) A concise statement explaining why the State Director's decision is believed to be wrong.

Except for any portions under protest, the Proposed RMP will become final after thirty (30) days. A Record of Decision (ROD) will be prepared documenting the final decision of the State Director. The ROD will be made available to the public through a Federal Register notice.

I wish to thank all of you who have participated in this planning effort and to encourage you to take part again at the next opportunity.

Sincerely,

Arthur E. Tower

Arthur E. Tower
Phoenix Resource Area Manager

PHOENIX
RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Draft ( ) Final (X)

The United States Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (X) Legislative ( )

2. Abstract: This Proposed Resource Management Plan and Final Environmental Impact Statement describes, and analyzes the expected impacts of implementing, the proposed management plan for the Phoenix Resource Area, Phoenix District, Arizona. This Proposed RMP is a modified version of the preferred alternative described and analyzed in the draft RMP/EIS.

3. For further information contact:

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4. Date filed with the Environmental Protection Agency:

5. Date by which protests must be postmarked:

Recommended:

Henri Bisson
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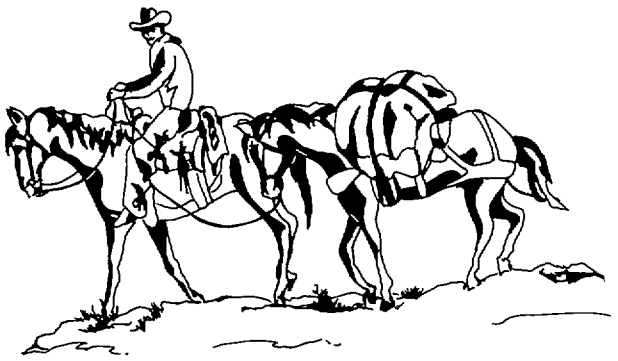
Phoenix District Office

Approved:

D. Dean Bibles
State Director
Arizona State Office

TABLE OF CONTENTS

	PAGE
SUMMARY	1
CHAPTER 1: PURPOSE AND NEED	
Description of the Planning Area	5
Planning Process Overview	7
Planning Issues	7
Environmental Issues	9
CHAPTER 2: PROPOSED RESOURCE MANAGEMENT PLAN	
Introduction	13
Public Land Not Included in This RMP/EIS	13
General Management Guidance	13
The Proposed RMP (General)	17
Description of the Proposed Resource Management Plan (RMP)	18
Proposed RMP and Draft Preferred Alternative Compared	28
Monitoring and Evaluating the Proposed RMP	28
Alternatives Considered But Not Analyzed	31
CHAPTER 3: AFFECTED ENVIRONMENT	
Introduction	79
Errata and Other Changes to Draft RMP/EIS	79
CHAPTER 4: ENVIRONMENTAL CONSEQUENCES	
Introduction	83
General Assumptions	83
Impacts of the Proposed Resource Management Plan	
Effects on Land Uses	83
Effects on Locatable Mineral Development	84
Effects on Watershed Condition	85
Effects on Rangeland Management	85
Effects on Areas of Cultural Significance	86
Effects on Vegetation	87
Effects on Riparian Habitat	87
Effects on Special Status Plants	87
Effects on Wildlife	89
Effects on Wild, Free-Roaming Burros	92
Effects on Recreation Use	93
Mitigating Measures	95
Unavoidable Adverse Impacts	95
Short-Term Versus Long-Term Productivity	95
Irreversible and Irretrievable Commitments of Resources	95
CHAPTER 5: CONSULTATION AND COORDINATION	
List of Preparers	99
State Office and Phoenix District Office Assistance	100
Scoping	100
Public Involvement and Consultation	101
List of Agencies, Organizations and Persons to Whom Copies of this Statement will be Sent	101
Public Comments on Draft RMP/EIS	103
Transcripts of Public Hearings	104
Letters Received During Comment Period	130
APPENDICES	
1. Other Changes to the Draft RMP/EIS	229
2. Empire and Cienega Ranches--Description and Interim Management	230
INDEX	235



TABLES

1-1	Public Land Acres by County	7
2-1	Resource Conservation Areas	20
2-2	Communication Sites	20
2-3	Areas Proposed for ACEC Designation	22
2-4	Areas Proposed for Special Management	24
2-5	CRMA and R&PP Land	26
2-6	Multiple Use Classifications Recommended for Revocation	27
2-7	RCA Acres Compared	28
2-8	Monitoring and Evaluation Plan	29
4-1	Estimated PILT Losses	84
4-2	Loss of Cultural Values in 10 Significant Areas	87
4-3	Riparian Areas Proposed for Special Management	88
4-4	Special Status Plant Habitat Acreages	88
4-5	Wildlife Habitat Acreages	90
4-6	Projected Long-Term Recreation Visits per Year	93

FIGURES

1-1 Steps in the Resource Management Planning Process 8
2-1 BLM Land Exchange Process 19

MAPS

1-1 Phoenix RMP/EIS Area 6

RESOURCE CONSERVATION AREAS (OVERVIEW)

2-1 South Central Portion Resource Conservation Areas 34
2-2 North Central Portion Resource Conservation Areas 35
2-3 Apache-Navajo Portion Resource Conservation Areas 36

RESOURCE CONSERVATION AREAS (DETAIL MAPS)

2-4 Baboquivari 38
2-5 Silver Bell 39
2-6 Picacho Mountains 40
2-7 White Canyon 41
2-8 Black Canyon 42
2-9 Lake Pleasant 43
2-10 Tanner Wash 44

UTILITY CORRIDORS

2-11 Silver Bell 46
2-12 White Canyon 47
2-13 Black Canyon 48

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

2-14 Baboquivari Mountains 50
2-15 Waterman Mountains 51
2-16 White Canyon 52
2-17 Perry Mesa and Larry Canyon 53
2-18 Tanner Wash 54
2-19 Appleton-Whittell 55

SPECIAL MANAGEMENT AREAS BY RESOURCE CONSERVATION AREA

2-20 Baboquivari 58
2-21 Silver Bell 59
2-22 Picacho Mountains 60
2-23 White Canyon 61
2-24 Black Canyon 62
2-25 Lake Pleasant 63

COOPERATIVE RECREATION MANAGEMENT AREAS

2-26 Black Canyon Trails 66
2-27 Lake Pleasant 67
2-28 San Tan Mountains 68
2-29 Tortolita Mountains 69
2-30 Sawtooth Mountains 70

RECREATION AND PUBLIC PURPOSE LAND

2-31 Goldfield 72
2-32 Picacho Reservoir 73
2-33 Zion Reservoir 74
2-34 Saginaw Hill and Tucson Mountain Park Extension 75

SUMMARY

SUMMARY

This *Phoenix Resource Management Plan and Environmental Impact Statement* (RMP/EIS) is being developed to guide the BLM in its management of the Phoenix Resource Area—about 911,000 acres of public land within two distinct geographic regions of Arizona.

The northern region, Apache and Navajo counties, encompasses about 229,000 acres of scattered public land lying north of the Sitgreaves National Forest and south of the Navajo Indian Reservation. The southern portion of the RMP area includes about 682,000 acres of scattered public land in central and south central Arizona. This southern portion has about 75 percent of the state's 2.7 million people and includes the major metropolitan areas of Phoenix and Tucson. The planning area covers all or parts of eight Arizona counties.

This RMP/EIS will update land use planning decisions in three existing Management Framework Plans (MFPs)—Silver Bell, Middle Gila and Black Canyon — as amended, and a Phoenix District Planning Analysis. Decisions from these documents that still have merit are incorporated into this RMP.

This RMP/EIS focuses on resolving six key planning issues associated with the management of the RMP area's public land. These six planning issues were identified by the public and the BLM during the RMP scoping period, which began on January 17, 1986. Resolution of the six identified issues would provide a long-term approach to managing public land in the Phoenix Resource area.

Management direction for two additional issues identified during scoping—rangeland management and wilderness management—has been addressed in previous EISs (i.e., the 1986 *Eastern Arizona Grazing EIS* and the 1987 *Phoenix Wilderness EIS*). The Record of Decision on the Eastern Arizona Grazing EIS and the Proposed Action Alternative in the Phoenix Wilderness EIS have been carried forward in this RMP/EIS.

The six issues identified for resolution in this RMP/EIS are:

Issue 1: Land Tenure Adjustment

Issue 2: Utility Corridors and Communication Sites

Issue 3: Areas of Critical Environmental Concern and Other Areas Requiring Special Management

Issue 4: Off-Road Vehicle Restrictions

Issue 5: Recreation Management

Issue 6: Land Classifications

The Proposed Resource Management Plan (RMP)

In response to requirements in the National Environmental Policy Act (NEPA) and following regulations developed by the Council on Environmental Quality (CEQ), alternative plans were developed by an interdisciplinary planning team to compare the environmental consequences of addressing the planning issues in dissimilar ways. Refer to the draft Phoenix RMP/EIS document for a description of the four alternatives chosen for initial study and for a comparison of the impacts of each in resolving the identified issues.

After reviewing public and governmental agencies' comments on the draft RMP/EIS, the planning team adopted a revised version of the draft plan's preferred alternative (alternative B) as the BLM's proposed action alternative. This proposed action alternative will be referred to henceforth as the Proposed RMP.

Under the Proposed RMP, the BLM would designate and intensively manage public land in the Phoenix Resource Area within seven Resource Conservation Areas (RCAs). Within these RCAs, the BLM would attempt to "block up" ownership by retaining about 437,400 acres of public land it now manages and by acquiring about 330,800 acres of state land in exchange for other public land. The BLM would also consider acquiring private land within the RCAs through exchange, but only if the land owners initiate the action. Through exchanges, the BLM would also attempt to acquire all the non-federally owned subsurface (mineral estate) within the RCAs. Outside the RCAs, about 439,600 acres of scattered public land would be available for disposal, primarily through exchange.

Seven utility corridors that identify priority routes for major utility systems would be designated under the Proposed RMP. The utility corridors would follow existing rights-of-way and are routed to avoid areas with high resource values. Five areas that could be developed as communication sites are also identified.

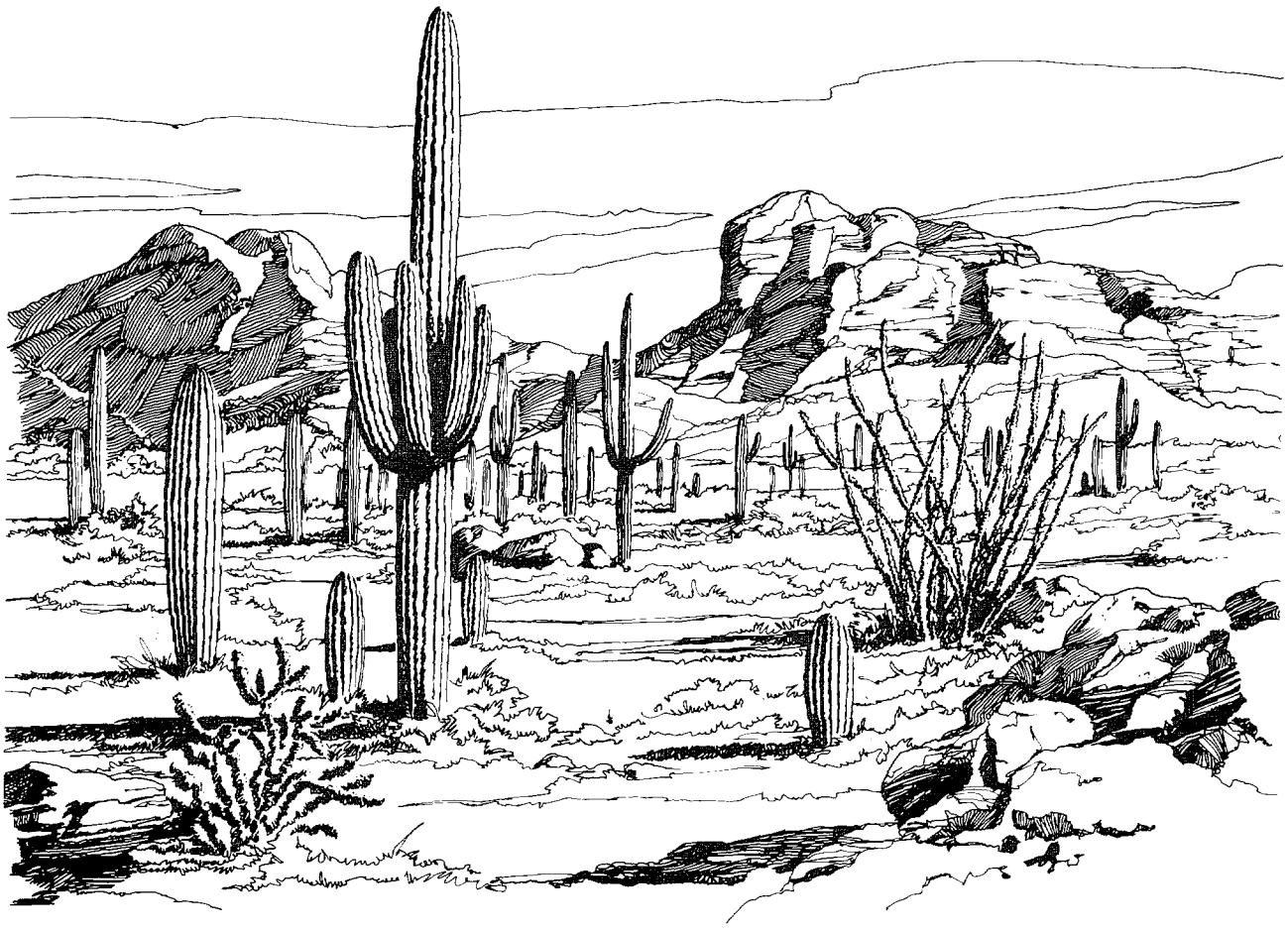
The Proposed RMP would designate six areas totaling about 10,121 acres of public land as Areas of Critical Environmental Concern (ACECs). These are areas containing highly significant historic, cultural, scenic or other natural values. Another 6,280 acres of state and private land would be added to these ACECs upon acquisition by the BLM. ACECs recommended for designation are Tanner Wash, Larry Canyon, White Canyon, Waterman Mountains, Baboquivari Peak and the public land portion of the Appleton-Whittell Research Ranch. Additionally, Perry Mesa, the site of important prehistoric cultural resources, would be designated an ACEC upon acquisition of about 8,480 acres of state land adjoining the 960 acres of public land.

Nineteen Special Management Areas (SMAs), land that would benefit from enhanced resource management, would also be created under the Proposed RMP. Seven of these are grazing allotments which show a need for improved multiple resource management of grazing, watershed, riparian, protected plant or wildlife habitat. On these allotments, cooperative resource management plans (CRMPs) would be developed upon the approval of the RMP.

Off-road vehicle travel would be limited to existing roads and trails on the majority of the public land within the RMP area. In addition, some closed areas and designated roads are identified within ACECs and SMAs.

If the Coyote Mountains and Hells Canyon Wilderness Study Areas are not designated as wilderness, the BLM would designate them as Recreation Management Areas under the Proposed RMP. Also, five Cooperative Recreation Management Areas (CRMAs) totalling about 33,900 acres (23,600 acres outside the RCAs) would be established in which the public would retain ownership but management and development for recreation would be worked out cooperatively between the BLM and state or local governments. The BLM would use its land exchange authority to acquire nonfederal or noncounty land within the CRMAs as necessary. CRMAs that would be designated are Lake Pleasant, Black Canyon Trails, San Tan Mountains, Tortolita Mountains and Sawtooth Mountains.

The Proposed RMP would also provide for transferring several public land parcels totalling about 2,800 acres to state and local governments through the *Recreation and Public Purposes Act* (R&PPA) and five BLM land classifications affecting about 12,200 acres in the RMP area would be terminated.



PURPOSE AND NEED 1

CHAPTER 1

PURPOSE AND NEED

This *Phoenix Resource Management Plan and Environmental Impact Statement* (RMP/EIS) is being prepared to guide the BLM in its management of approximately 911,000 acres of public land in Arizona within the Phoenix Resource Area. It is prepared under the authority of Sections 102 and 202 of the *Federal Land Policy and Management Act* (FLPMA) and in conformance with the BLM planning regulations, 43 CFR 1600.

The *National Environmental Policy Act* (NEPA) requires all federal agencies to prepare EISs on major federal actions. An RMP is considered a major federal action, therefore, it is accompanied by an EIS. The final EIS (FEIS) in this document analyzes the impacts of implementing the BLM's proposed action alternative (the Proposed RMP) for the Phoenix Resource Area and, together with the alternative analysis in the draft RMP/EIS, conforms to the Council on Environmental Quality (CEQ) regulations for implementing NEPA.

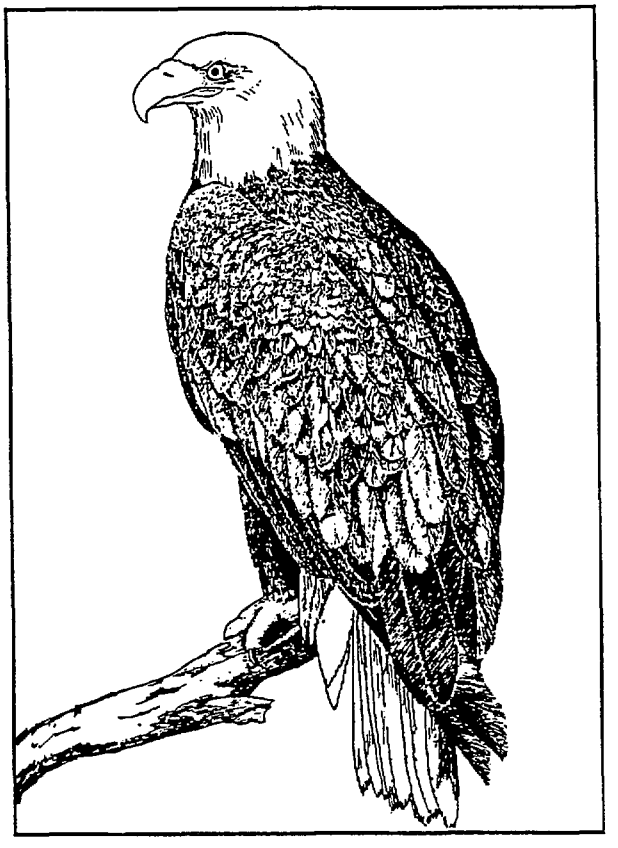
This RMP/EIS focuses on resolving six key planning issues associated with the management of the RMP area's public land. These six planning issues were identified during BLM's scoping process. The scoping process was designed to identify the issues and was begun on January 17, 1986 when the BLM published in the *Federal Register* a Notice of Intent (NOI) to prepare an RMP/EIS. Following the issuance of the NOI, the BLM held several public meetings and sent mailouts asking the public to identify issues that should be addressed in the RMP/EIS. See Chapter 5 for a description of the public input opportunities available for this RMP/EIS. This RMP/EIS does not address two key issues identified during the scoping process. These two issues—rangeland management and wilderness—have been covered by the BLM in separate EISs: rangeland management in the *Eastern Arizona Grazing* EIS (1986) and wilderness management in the *Phoenix Wilderness* EIS (1987). The Record of Decision on the *Eastern Arizona Grazing* EIS and the Proposed Action Alternative in the Phoenix Wilderness EIS have been carried forward in this RMP/EIS.

This RMP/EIS would replace land use planning decisions in three existing Management Framework Plans (MFPs)—Silver Bell, Middle Gila and Black Canyon— as amended, and a Phoenix District Planning Analysis which have guided the BLM's management of public land in the RMP area for the past 12 years. The current planning decisions that still have merit are incorporated into this RMP. Until decisions resulting from this RMP are documented in the Arizona State Director's Record of Decision, however, the existing planning decisions remain valid.

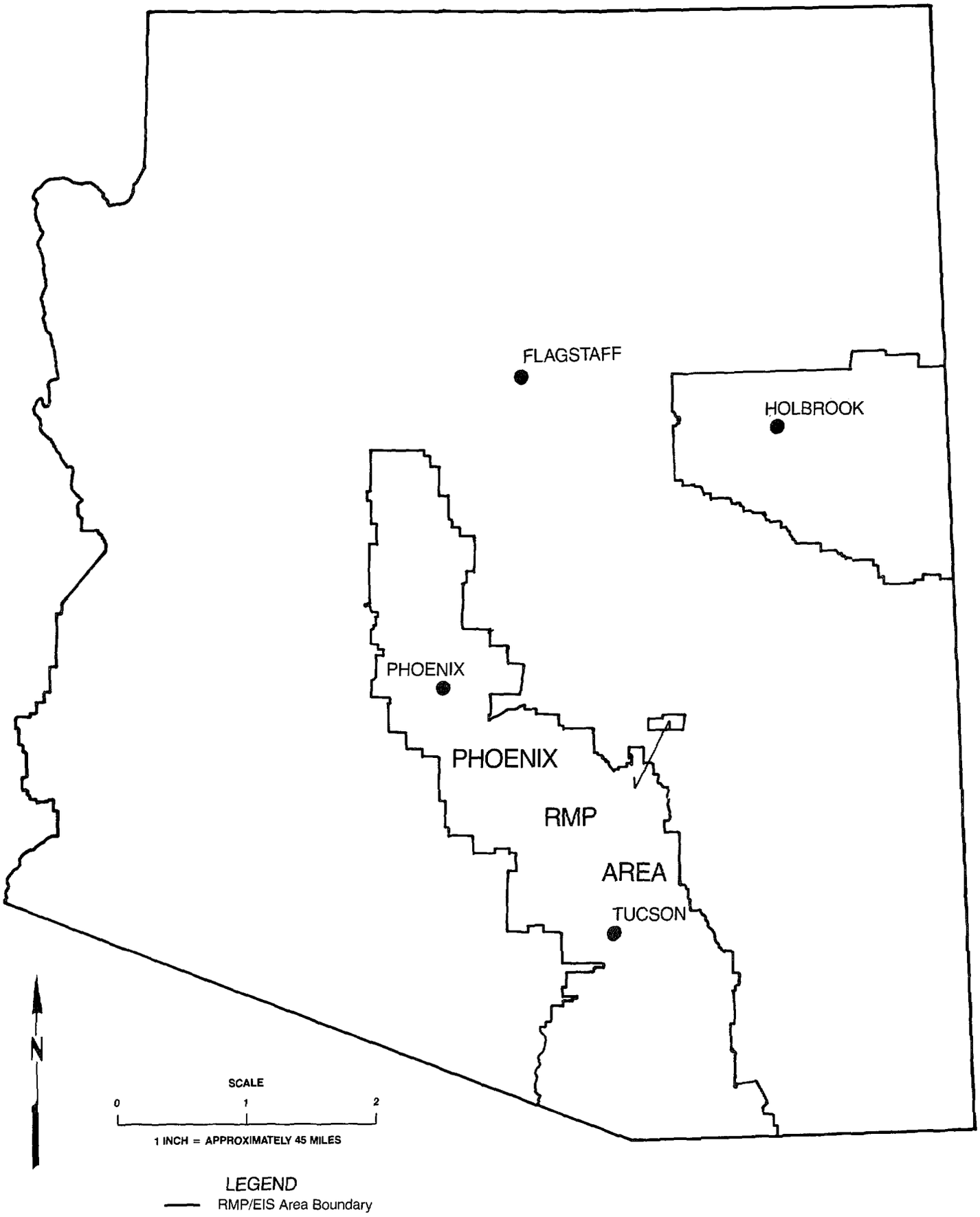
Description of the Planning Area

The Phoenix RMP area is divided into two distinct geographic regions (see Map 1-1). The northern region, Apache and Navajo counties, encompasses about 228,700 acres of scattered public land lying north of the Sitgreaves National Forest and south of the Navajo Indian Reservation.

The southern portion of the RMP area includes 682,640 acres of scattered public land in central and south central Arizona. The land is among private and state holdings and Indian reservations. The southern portion of the planning area has about 75 percent of the state's 2.7 million people and includes the major metropolitan areas of Phoenix and Tucson.



MAP 1-1
PHOENIX RMP/EIS AREA



The planning area covers all or parts of eight Arizona counties. Table 1-1 shows a county-by-county breakdown of the surface and minerals acres administered by the BLM in the Phoenix Resource Area.

The public land pattern in the RMP area includes 20 percent blocked land, 40 percent checkerboard and 40 percent scattered. Population pressures exerted by the major metropolitan areas of Phoenix and Tucson have greatly increased the demands on public land in the RMP area. From an economic standpoint, much of the planning area's public land is high value, approaching one dollar per square foot in some areas.

The RMP area's public land provides valuable public recreation opportunities and exhibits important wildlife, archaeological, wilderness, scenic and recreational values. Often the protection of these important resource values conflicts with development pressures, requiring that difficult choices be made. It is the BLM's goal to provide through this RMP/EIS, a long-term approach to resolving these conflicts.

addressed in the RMP/EIS. The planning team then analyzed the public's comments and identified six major planning issues to be resolved.

The six issues are:

Issue 1: Land Tenure Adjustment

Land Tenure Adjustment is the major RMP issue. The BLM in Arizona is currently involved in a large-scale state and private exchange program designed to block up land ownerships for more efficient management. To resolve this issue, the BLM would need to design a long-term land tenure adjustment program for the RMP area.

Issue 2: Utility Corridors and Communication Sites

The resolution of this issue would require the identification of routings and sites for major utility and communication site rights-of-way.

TABLE 1-1

Public Land Acres by County (Surface and Mineral Ownership)
Bureau of Land Management, Phoenix District, Arizona

COUNTY	Fed.Surface Fed.Minerals	Fed.Surface State Minerals	Fed.Surface Priv.Minerals	State Surface Fed.Minerals	Priv.Surface Fed.Minerals
Apache	129,670	0	4,227	32,326	59,245
Gila	6,115	0	0	120	3,040
Maricopa	76,088	1,237	0	55,967	113,439
Navajo	93,050	1,760	0	16,699	45,081
Pima	160,975	240	240	55,923	345,389
Pinal	263,725	720	0	188,213	142,916
Santa Cruz	2,841	0	0	1,800	29,895
Yavapai	170,294	111	50	78,644	70,601
TOTAL	902,758	4,068	4,517	429,692	809,606

Source: Phoenix District files.

Planning Process Overview

The BLM resource management planning process consists of nine steps, graphically illustrated in Figure 1-1.

Planning Issues

Planning issues are those major concerns, problems or opportunities associated with the management of the public land in the RMP area. The issues drive the RMP in that the Proposed RMP and the other alternatives studied are primarily designed to resolve the identified planning issues.

The BLM interdisciplinary planning team used the scoping process to identify issues. Through communication media such as public meetings, newsletters and directed mailings, the public was given the opportunity to identify issues that needed to be

Issue 3: Areas of Critical Environmental Concern and Other Areas Requiring Special Management

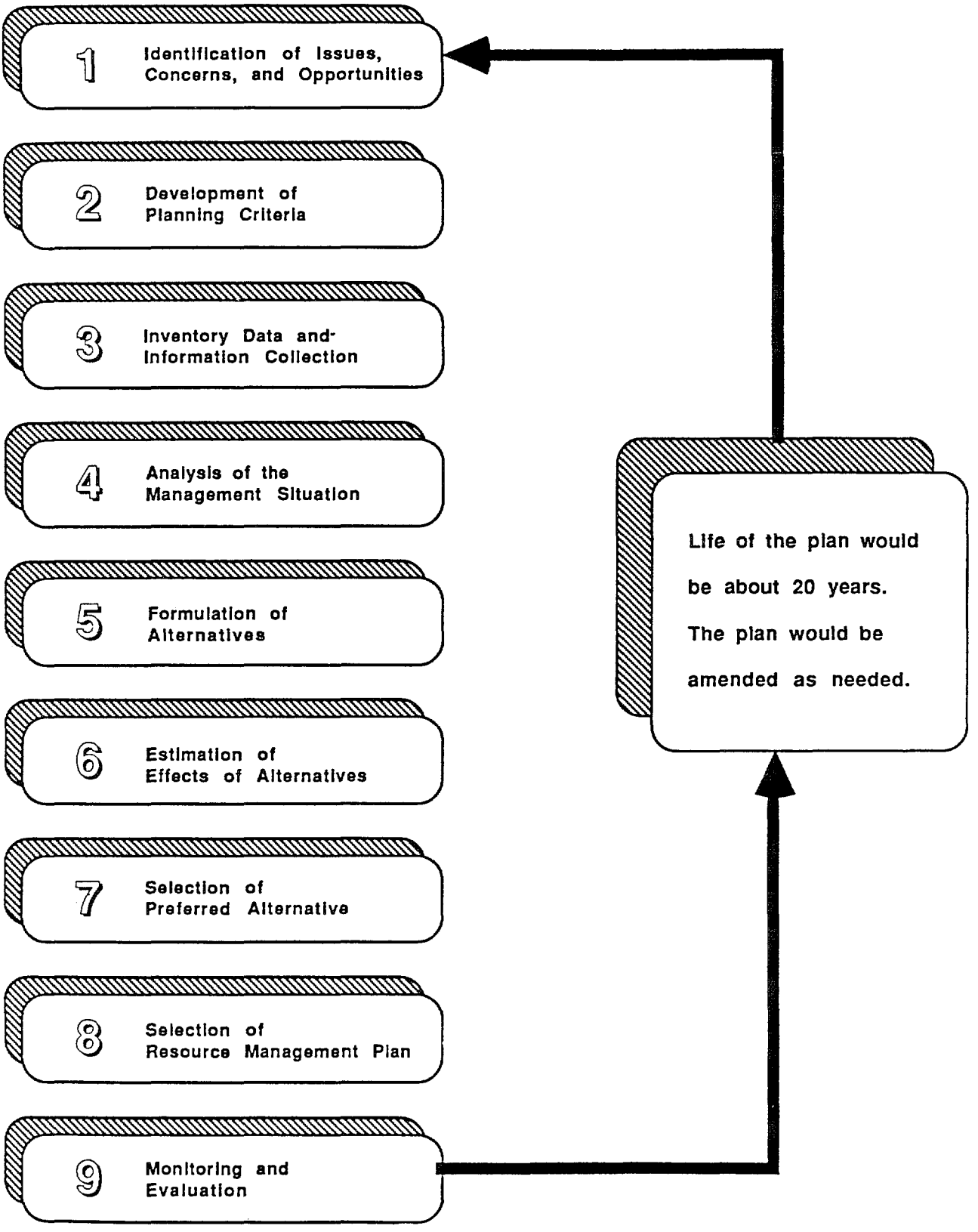
Scoping identified areas and resources which might benefit from or require special management. Consequently, a resolution of this issue would require consideration for designating areas of critical environmental concern (ACECs) or other special management areas (SMAs).

Issue 4: Off-Road Vehicle Restrictions

ORV restrictions are an issue because of public concern about vehicle use on public land and because current BLM policy requires all public land to be designated as open, closed or limited for ORV use.

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS

Figure 1-1

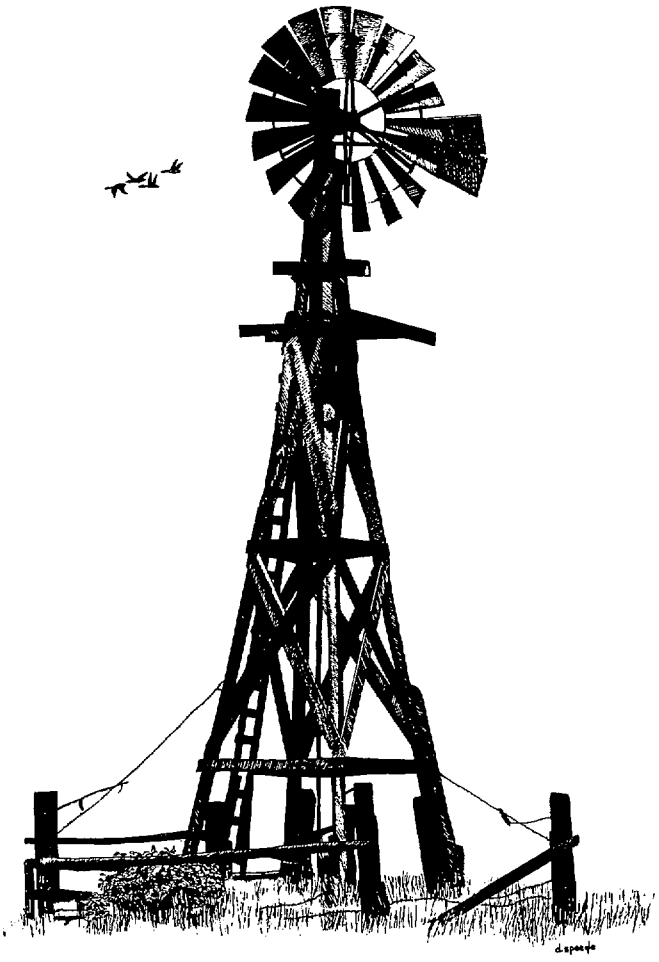


Issue 5: Recreation Management

This issue was identified by the public and local governments during scoping. The concern focused on the need for the BLM to provide open space recreation opportunities near Phoenix and Tucson and also for the BLM to provide public land for local park development. A resolution of this issue would require a identification of land in the RMP Area suited for these purposes.

Issue 6: Land Classifications

The *Federal Land Policy and Management Act* (FLPMA) calls for a review of all existing classifications in the land use planning process. Consistent with FLPMA, classifications no longer useful for their intended purpose would, through this RMP/EIS, be recommended for termination.



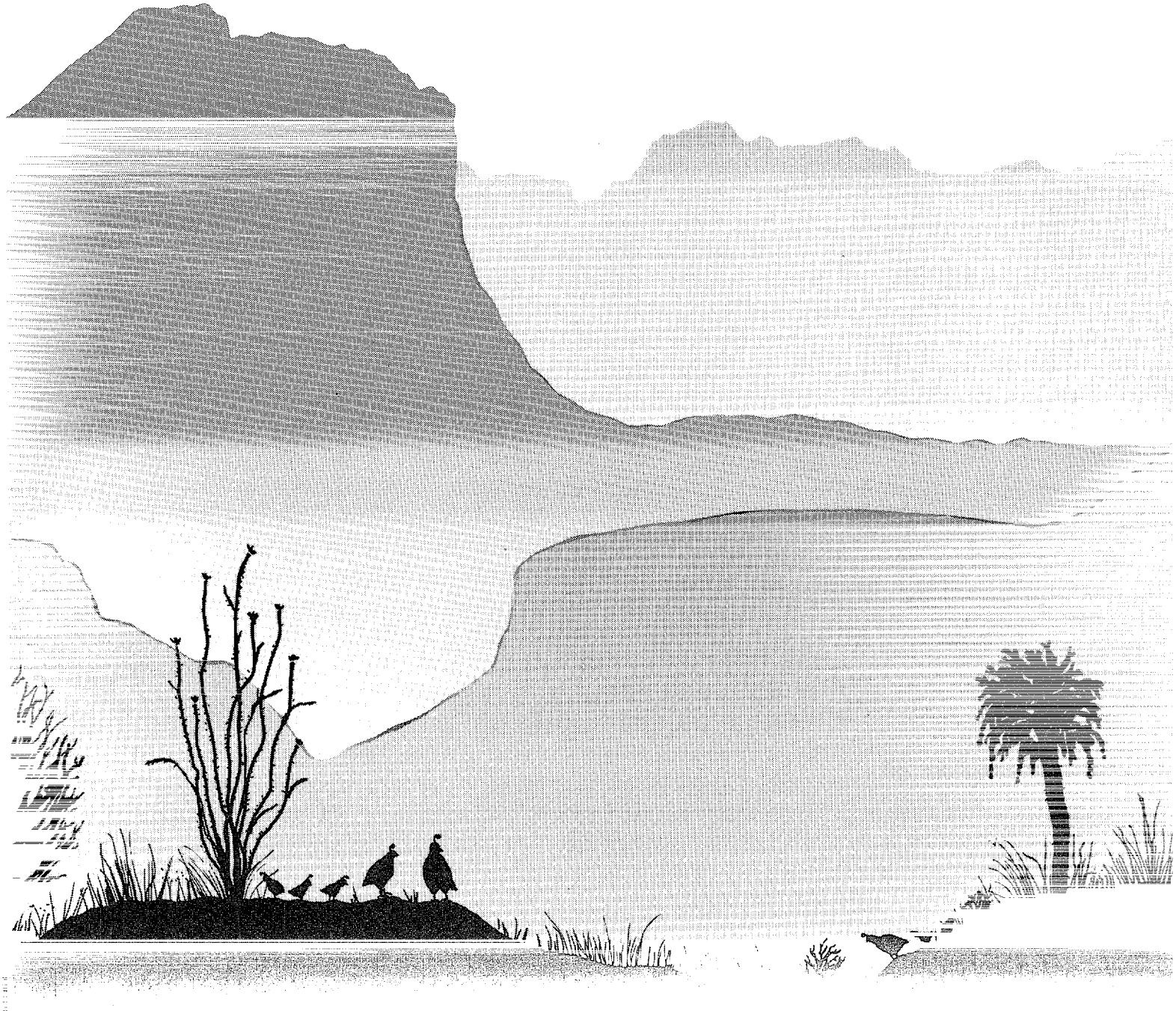
Environmental Issues

Information received from the public during the issue identification phase of this planning effort was also utilized by the BLM planning team to identify significant "environmental issues" that would be addressed. An environmental issue is a value that is expected to be significantly impacted by one or more of the alternatives chosen for study. Consistent with CEQ regulations, this FEIS discusses effects on only those environmental issues that would be significantly impacted by the Proposed RMP. The environmental issue identification process eliminates from detailed study the environmental issues which would not affected by the Proposed RMP. The environmental issues impacted by the Proposed RMP are the same as those identified in the draft RMP/EIS as being significantly affected by one or more of the other alternatives chosen for study.

The environmental issues in this Proposed RMP/FEIS are:

1. Effects on Land Uses -
   - Land ownership
   - Land available for recreation and other public purposes
   - Right-of-way development
   - Payments in lieu of taxes (PILT)
2. Effects on locatable mineral development
3. Effects on watershed condition
4. Effects on rangeland management -
   - Ranch operations
   - Ranch values
5. Effects on areas of cultural significance
6. Effects on vegetation
7. Effects on riparian habitat
8. Effects on special status plants -
   - 3 federally listed species
   - 3 federal candidate species
9. Effects on wildlife -
   - 3 federally listed species (also state listed)
   - 1 federal candidate species (also state listed)
   - 1 state listed species
   - 3 game species
10. Effects on wild, free-roaming burros
11. Effects on recreation use

PROPOSED RESOURCE MANAGEMENT PLAN 2



CHAPTER 2

PROPOSED RESOURCE MANAGEMENT PLAN

Public Land Not Included In This RMP/EIS

In June 1988 the BLM in Arizona made a decision to acquire, by exchange, 41,000 acres of private land within the Empire and Cienega ranches southeast of Tucson within the Phoenix Resource Area. The acquisition was made at the urging of members of Arizona's congressional delegation representing the area. The ranches contain numerous important natural resources which would benefit from being protected and managed in public ownership. Although the acquisition was accomplished too late for the land to be included in this RMP/EIS, it is anticipated that development of a land use plan for the area will begin in 1989. The resulting plan will become an amendment to the Phoenix RMP. See Appendix 2 in this document for a description of the ranches and for the interim management guidance which will be in force until the land use plan for the ranches is completed.

Introduction

The Proposed Resource Management Plan (RMP) described in this chapter was developed by the BLM's interdisciplinary planning team. Based on the preferred alternative of the draft RMP (alternative B), this Proposed RMP represents a complete plan to guide future management of the public land in the Phoenix Resource Area.

Differences between the Proposed RMP and the preferred alternative of the draft RMP/EIS represent changes resulting from public and governmental agencies' comments, new resource information and the draft EIS analysis. For the reader's convenience in making comparisons, differences between the Proposed RMP and the preferred alternative of the draft RMP/EIS are highlighted in this chapter and in chapter four **in bold print.**

Wilderness recommendations and grazing management decisions for the RMP area have been made independently of this plan. These are found in the 1987 *Final Phoenix Wilderness EIS* and the 1987 *Range Program Summary - Record of Decision* for the Phoenix and Safford Districts. This guidance is incorporated into this RMP/FEIS by reference.

General Management Guidance

In addition to the management actions cited in an approved RMP, management of public land in the RMP area would be guided by various laws, regulations and policies. Those which apply significantly to programs receiving substantial public interest are summarized in the following section. Additional general management guidance can be found in the Phoenix Management Situation Analysis (MSA) prepared during the early stages of this planning effort. The MSA also contains the RMP area's inventory results and a capability analysis section. The MSA is available for review at the Phoenix District Office and is incorporated here by reference.

Land Use Management

Land Tenure Adjustment. All land identified as suitable for disposal by sale in this Proposed RMP meets the criteria set forth in Sec. 203 (a)(I) of the *Federal Land Policy and Management Act* (FLPMA) of 1976 which states that "...such tract because of its location or other characteristics is difficult and uneconomical to manage as part of the public land and is not suitable for management by another federal department or agency."

All land would be disposed of at fair market value, excluding land disposed of to local governments under the *Recreation and Public Purpose Act* (R&PPA). All disposals would be subject to valid existing rights.

The BLM's ability to dispose of land identified for sale or exchange in this Proposed RMP/FEIS may be constrained by the existence of withdrawals. Not all withdrawals preclude the disposal of the withdrawn land, but in most cases, the BLM would not dispose of withdrawn land until the withdrawal designation has been lifted. FLPMA Sec. 204 (k)(1) requires that all withdrawals affecting public land be administratively reviewed by 1991. Land that becomes unencumbered through the withdrawal review process will then come under the guidance of recommendations made in an approved RMP/FEIS.

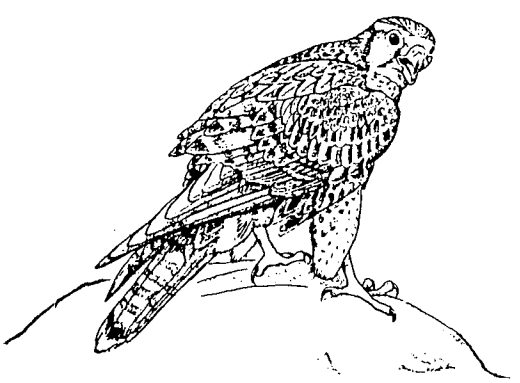
Currently, it is BLM policy not to dispose of public land encumbered with properly recorded unpatented mining claims. However, disposal actions under sections 203 and 206 of FLMPA and the Act of June 14, 1926, as amended, may occur if: 1) the mining claims are found to be void due to failure by the claimant to comply with Sec. 314 of FLMPA, 43 USC 1744 (1982) and 43 CFR 3833.2-1, 2) the mining claimant relinquishes the mining claims to the United States, 3) the mining claim is contested and found to be invalid or 4) a change in current policy allows for the disposal of public land encumbered with mining claims.

In addition, any land identified for disposal would be evaluated for significant cultural resources, threatened and endangered plants and animals, floodplain/flood hazards and prime and unique farmland before actual transfer of the land is completed.

Communication Sites. Communication site applications will continue to be considered on land identified for disposal until such time as disposal takes place. On land retained or acquired, communication facility development would be limited to designated sites. Communication site plans would be developed on all designated sites.

Land Use Authorizations. Land use authorizations (rights-of-way, leases, permits, easements) would continue to be issued on a case-by-case basis and in accordance with recommendations in this Proposed RMP/FEIS.

Rights-of-way would be issued to promote the maximum utilization of existing right-of-way routes, including joint use whenever possible.



Utility Corridors. All major utilities would be routed through designated corridors. This would prevent the proliferation of major routes across public land and would reduce adverse environmental impacts to sensitive resources.

Recreation and Public Purposes Act (R&PPA). Under the R&PP Act, the BLM has the authority to lease or patent public land to governmental or nonprofit entities for public parks, building sites, correction centers or for other public purposes. R&PPA leases and patents would be issued in accordance with the recommendations in this RMP.

To ensure public purpose development of public land slated for R&PPA transfer, the BLM may require that land first be leased for a period of time prior to issuing a patent.

Public Land Withdrawals and Classifications. Current pending litigations have enjoined the BLM from terminating or modifying withdrawals and classifications under Sec. 204 (l) and 204 (d) of FLPMA. The BLM has been congressionally mandated to complete all Sec. 204 (l) withdrawal reviews by 1991.

In general, all actions proposed in the approved RMP and not prohibited by specific terms of a withdrawal or classification would be carried out. Actions prohibited by the specific terms of the withdrawal or classification would remain in effect until such withdrawals are revoked or classifications terminated.

Minerals Management

Mineral exploration and development are generally encouraged on public land in keeping with the Bureau's multiple resource concept. Overall guidance on the management of mineral resources appears in the *Mining and Minerals Policy Act of 1970,* Sec. 102 (a)(12) of FLMPA, *National Materials and Minerals Policy, Research and Development Act of 1980* and the BLM's *Mineral Resources Policy of May 29, 1984.*

Locatable Minerals. Exploration for and development of locatable minerals are provided for under the regulations 43 CFR 3802 and 3809. These provide for mineral development in conjunction with resource protection. They are designed to prevent unnecessary and undue degradation of the environment from mining activity. Mining activity within the planning area would continue to be administered on a case-by-case basis.

Saleable Minerals. Sales of mineral materials to the public would continue to be administered on a case-by-case basis **under regulations in 43 CFR 3600**. Generally, saleable minerals are sold at market prices. Free use permits would continue to be issued to the state and local communities as the need arises.

Leasable Minerals. 43 CFR 3100 to 3500 provides the regulatory framework for the issuance of mineral leases. These regulations apply where public interest exists for the development of oil, gas, sodium, potassium and geothermal resources. **The interdisciplinary team has determined that future exploration and development of leasable minerals in the RMP area is only a remote possibility. Nevertheless, constraints on surface use within some special management areas and ACECs have been recommended in this Proposed RMP/FEIS should development be proposed. All land in the RMP area would remain open to leasing. Should exploration and/or development of leasable resources be pursued during the life of this RMP, special stipulations will be incorporated into the lease agreement after the results of site-specific environmental assessments for each action are known.**

Rangeland Management

The grazing program in the RMP area is managed under provisions of the *Taylor Grazing Act of 1934*, the *Federal Land Policy and Management Act* (FLPMA) of 1976 and the *Public*

Rangelands Improvement Act of 1978. These acts provide authority for issuing grazing leases/permits, supervising grazing use, managing grazing use, installing range improvement facilities and treatments, acting to detect and abate unauthorized use and taking other range management actions.

Management of rangeland resources **is guided by the Range Program Summary - Record of Decision (RPS/ROD) which selected the Preferred Alternative analyzed in the 1987 Eastern Arizona Grazing FEIS.**

The Grazing RPS/ROD complies with requirements of the *National Environmental Policy Act of 1969* and FLPMA and covers all land within the RMP area. This RPS/ROD provides guidance for the RMP area's grazing management program with the following objectives: 1) to restore and improve rangeland condition and productivity, 2) to provide for use and development of rangeland, 3) to maintain and improve habitat and viable wildlife populations, 4) to control future management actions and 5) to promote sustained yield and multiple use.

All grazing allotments in the district have been assigned to one of three management categories on the basis of present resource condition and management needs, range potential, conflicts with other resource values and economic potential for improvement. See Appendix 2 of the draft RMP/EIS for allotment categorizations.

Categorization establishes priorities for the distribution of rangeland management funds in order to achieve cost-effective improvement of rangeland conditions and production on each allotment. The three categories are: "M"—Maintain, "I"—Improve and "C"—Custodial. The "M" category allotments are managed to maintain satisfactory conditions, "I" allotments are managed to improve unsatisfactory conditions and "C" allotments receive custodial management to prevent resource deterioration. Efforts are concentrated in allotments where monitoring and evaluation indicate that grazing management actions are needed to improve the basic resource or to resolve serious resource-use conflicts. The BLM recategorizes allotments as management needs or objectives shift or potential for improvement changes.

The *Eastern Arizona Grazing Final* FEIS provides information about ecological condition and apparent trend for all RMP area allotments. The EIS also identifies the current carrying capacity, in animal unit months (AUMs), and the expected AUM capabilities of each allotment as the EIS range program is implemented. This information is shown in Appendix 3 of the draft RMP/EIS.

Wilderness Management

The Phoenix Wilderness **Final EIS** (BLM, Phoenix District, 1987) recommendations are incorporated by reference in this Proposed RMP/FEIS (see Appendix 5 of the draft RMP/EIS). Two wilderness study areas, the Baboquivari Peak WSA and the Coyote Mountains WSA, are recommended for wilderness designation. Hells Canyon WSA, White Canyon WSA and Picacho Mountains WSA are not recommended as suitable. The South Bradshaws and Ragged Top WSAs have been evaluated **and recommended not suitable for wilderness** in the *Arizona-Mohave Wilderness FEIS* (BLM, Phoenix and Safford Districts, 1988). All WSAs in the RMP area would continue to be managed under the BLM's *Interim Management Policy* until Congress either releases them from review or designates them as wilderness. Those released would be managed according to decisions in the approved Phoenix RMP. Those added to the wilderness system would be managed under provisions of the designating legislation.

Wildlife and Special Status Plant Resource Management

Wildlife and wildlife habitat on public land in Arizona are managed under a memorandum of understanding with the Arizona Game and Fish Department. State-protected plants are managed in cooperation with the Arizona Commission of Agriculture and Horticulture. Wildlife and plants which are federally listed or proposed for listing as either threatened or endangered are protected under provisions of the *Endangered Species Act of 1973*, as amended. Any actions authorized, funded or carried out by a federal agency which may affect listed or proposed species are reviewed in cooperation with the U.S. Fish and Wildlife Service. It is BLM policy to avoid jeopardizing the continued existence of any listed or proposed species and to actively promote species recovery. It is also BLM policy to manage federal candidate species and their habitat to prevent the need for listing as threatened or endangered.

Potential impacts to wildlife and special status plants are analyzed in an environmental assessment for each project and protection measures may be stipulated in the decision record.

Wild, Free-Roaming Burros

Public Law 92-195, December 15, 1971 (16 USC 1331-1340, as amended) made the BLM responsible for the welfare and protection of unbranded and unclaimed burros found on public land at the time of the Act's passage. The management of burros on public land requires their removal from adjacent private or state land when requested, the development of a herd management area plan, the maintenance of a herd inventory and the removal and disposal of excess animals to the public by adoption, if possible. The management of burros on public land is accomplished at the minimum level necessary to assure the herd's free-roaming character, health and self-sustaining ability.

Cultural Resource Management

Cultural resources on public land are protected under an array of laws and regulations. Two of the most important laws are the *National Historic Preservation Act* (NHPA) of 1966 and the *Archaeological Resources Protection Act (ARPA) of 1979*. Under NHPA, potential impacts to National Register and National Register-eligible properties are identified and measures to

mitigate those impacts are developed in consultation with the Arizona State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation. ARPA prohibits the excavation, removal or damage of archaeological resources from public land by unauthorized persons. Since 1985, the BLM in Arizona also has operated under terms of a general compliance Programmatic Memorandum of Agreement with the state which guides inventory and data recovery procedures for cultural resources **affected by BLM actions which qualify under criterion "d" of the National Register**, and a specific Memorandum of Agreement addressing the protection of cultural resources in BLM-State land exchanges (memoranda on file in the Phoenix District Office).

The objective of cultural resource management in the RMP area would continue to protect the information potential or the public use values of properties or to manage them, when applicable, for conservation. The guidelines for continued management under each objective are found in Appendix 6 of the draft RMP/EIS.

Soil, Water and Air Resources

Soil Resources. The maintenance and improvement of soil cover and productivity would continue to be accomplished through preventive measures and land treatments. Preventive measures would be brought forward in project planning and NEPA review. Preventive measures typically include the avoidance of erosion-prone areas, restrictions on type and season of use and closure to certain uses. Land treatments would be identified where excessively eroded rangeland could be stabilized.

Salinity control measures would be incorporated into these erosion prevention strategies and rehabilitation treatments. Land treatments include implementing proper grazing systems, reseeding grasses and forbs to reestablish ground cover, contour furrowing, imprinting, prescribed burning and the construction of water control structures.

Water Resources. Legal availability of water is provided by assertion of public water reserve doctrine and compliance with state water law. Maintenance or enhancement of streamflow would be achieved pursuant to activity plans developed for special management areas.

Floodplain Management. *Executive Order 11988* directs federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development whenever there is a practicable alternative" (*Floodplain Management Guidelines*, 43 CFR 6030, 1978). It is Bureau policy to retain base (100-year) floodplains except:

Where federal, state, public and private institutions and parties have demonstrated the ability to maintain, restore and protect the floodplain on a continuous basis.

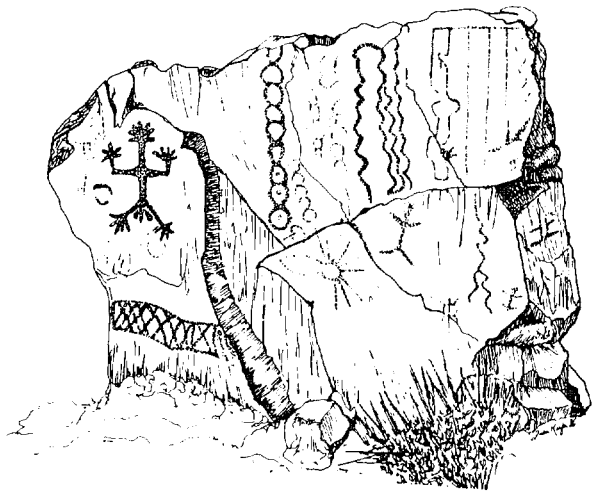
Where transfer of land, minerals or subsurface estates is mandated by legislation or Presidential Order.

Existing district procedures meet the requirements of this policy. District procedures may also require additional mitigation identified in environmental assessments prepared for specific projects or actions.

Water Quality. The BLM objective for water quality is to ensure that all waters on public land meet or exceed federal and state water quality standards. Generally, the BLM deals with nonpoint sources of pollution, which are addressed in Section 208 of the *Federal Water Pollution Control Act Amendments of 1972* (PL-92-500) **as amended by the *Water Quality Act of 1987* (PL 100-4)**. The EPA has designated various agencies within the state as having the responsibility for Section 208 planning. These agencies assess nonpoint sources of pollution and prepare water quality management plans. The Arizona Department of Environmental Quality reports water quality status to the EPA annually.

Impacts to water quality are prevented or reduced through the application of specific mitigative measures identified in project planning and NEPA review. Where feasible, watershed improvement projects would be implemented to increase ground cover and ultimately reduce erosion, sediment yield and salinity contributions from public land.

Air Quality. Impacts to air quality resulting from activities on public land would be prevented or reduced through mitigations brought forward in NEPA compliance of proposed projects. Typically, activities on public land which might affect air quality are addressed by Article 4 (R9-3) of the Arizona Rules and Regulations. Prescribed burning, road construction, permitting the construction of mineral tailings piles and allowing dust emissions from passing vehicles in vacant lots are all specifically addressed in the regulations. The BLM permit and NEPA review processes are designed to ensure compliance with these regulations. For identification and coordination purposes, the BLM refers to the State Implementation Plan goals for air quality nonattainment areas.



Hazardous Materials (HAZMAT) Management

The three laws most commonly associated with HAZMAT include the *Resource Conservation and Recovery Act*, or RCRA (PL 94-580), the *Comprehensive Environmental Response, Compensation and Liability Act*, or CERCLA (PL 96-510), otherwise known as the *Superfund Act*, and the *Superfund Amendment Reauthorization Act* (E.O. 12580, 1986). BLM responsibilities under these acts include conformance with state RCRA enforcement regulations pertaining to the storage, handling and disposal of hazardous materials and reporting unpermitted HAZMAT discharges under the provisions of CERCLA.

Fire Management

Current fire management policy for the RMP area is to maintain full suppression in all areas. Full suppression is defined as taking sustained and appropriate action necessary to promptly suppress wildfires. A fire overhead team, hand crews, aerial fire retardant, crawler tractors, fire engines and other specialized equipment may be utilized in the control effort. Preference is given to suppression methods that are cost-effective, efficient and are least damaging to resources and the environment.

If fires escape initial attack, an Escaped Fire Situation Analysis (EFSA) will be prepared to determine the most appropriate suppression strategy based on safety, cost efficiency and effectiveness of fire suppression resources.

A close coordination with other fire organizations with suppression responsibilities would continue for areas adjacent to public land in the RMP area. Following the approval of this RMP, special management area activity plans developed would identify any areas where prescribed burning would benefit wildlife, watershed and rangeland resources.

Recreation Management

Management prescriptions required to manage cooperative recreation management areas (CRMAs) would be jointly developed in master plans between the BLM and the cooperating agency. Management prescriptions that would be addressed in the master plan include ORV travel, signing requirements, recreation facilities, fee collections and visitor use allocations. Until such time as the master plans are developed for each CRMA, the BLM would manage the areas under the guidance provided in this section.

Environmental Management

The BLM would prepare a site-specific environmental analysis before actions in the approved RMP are implemented. The environmental analysis would provide a site-specific assessment of the impacts of implementing the actions. In addition, the BLM would conduct wildlife, protected plant and cultural resource clearances as a part of the environmental analysis process. The analysis would also identify mitigation necessary to reduce the impacts of implementing an approved action.

Actions that are not specifically identified in the approved RMP/FEIS would be analyzed through an environmental assessment or an EIS in accordance with NEPA and the RMP amendment (1610.5-5) portion of the planning regulations (43 CFR 1600).

The Proposed RMP

This section of the RMP/FEIS describes in detail the proposed action alternative chosen for study. This alternative is the BLM-proposed RMP which describes the BLM's preferred course of action for managing the public land in the Phoenix RMP area.

The Proposed RMP differs somewhat from the preferred alternative described in the draft RMP/EIS due to the consideration of impacts identified in the draft EIS, new information and comments received from the public.

Most of the land use actions identified in this Proposed RMP would become implemented upon the BLM State Director's signing of the RMP/FEIS Record of Decision (ROD). These actions include the designation of utility corridors, communication sites, areas of critical environmental concern, special management areas, recreation management areas and off-road vehicle (ORV) designations.

Other actions identified in the Proposed RMP cannot be implemented solely upon the approval of the ROD by the BLM State Director. For example, mineral withdrawals on fewer than 5,000 acres must be approved by the Secretary of the Interior while mineral withdrawals on greater than 5,000 acres require congressional review (FLPMA Sec. 204 (c)(1). Thus, actions such as these may be recommended in the approved RMP but do not become valid until approved by the appropriate body. However, all actions recommended in the approved RMP will be pursued.

This Proposed RMP centers on resolving the land tenure adjustment issue by establishing Resource Conservation Areas (RCAs). Within these RCAs, the BLM would retain and intensively manage all public land and would work toward acquiring state and private parcels with resource values that would benefit from public ownership. Acquisition of state and private parcels to consolidate public ownership within the RCAs would take place only with the consent of the Arizona State Land Department or the affected private landowner. Land exchanges would be the primary form of land acquisition. No land purchases to block up ownership in the RCAs are anticipated.

On land identified for disposal, no further planning decisions are necessary because disposal is the desired land use. Interim management on disposal land would be as described under the **General Management Guidance** section of this chapter. Note that identification of land for disposal is not an irrevocable decision. The Proposed RMP identifies large amounts of land for disposal; however, until an exchange occurs this land remains in federal ownership.

Once land is identified in an exchange package, a series of steps are taken before an actual exchange takes place. The exchange process is **generally** described in Figure 2-1. Note that all exchanges include a site-specific environmental assessment, complying with NEPA and CEQ regulations, which identifies impacts to resources on the land. If a particular exchange would negatively impact critical resource values, the BLM may opt to retain the land. Identifying public land for disposal (as required by FLPMA) is only the first step in the exchange process.

The following is a detailed description of the Proposed RMP chosen for study in this RMP/FEIS.

Description of the Proposed Resource Management Plan

This alternative is the BLM's Proposed Resource Management Plan (RMP). The Proposed RMP is designed to resolve the six identified planning issues and alleviate the significant management problems associated with managing the RMP area's scattered land ownership pattern. **This Proposed RMP is a revised version of the preferred alternative described in the draft RMP/EIS. The revision is based on the consideration of public and governmental agencies' comments on the draft RMP/EIS, the results of the draft EIS analysis and new information.**

Issue 1 - Land Tenure Adjustment

Under the Proposed RMP, the BLM would consolidate ownership and intensively manage land in seven Resource Conservation Areas (RCAs). Maps 2-1 through 2-3 provide an overview of the RCAs being proposed. More detailed drawings of the RCAs are shown in the map section at the end of this chapter (see Maps 2-4 through 2-10). Altogether the seven RCAs contain 49 percent (437,476 acres) public land (surface estate), 38 percent (330,814 acres) state land and 13 percent (121,194 acres) private land (Table 2-1). The BLM would retain all public land (surface and subsurface estate) within the seven RCAs and pursue the acquisition of all state land through the BLM-State of Arizona exchange program. Private land within the RCAs is not specifically identified for acquisition; however, exchange proposals initiated by the private owners within these RCAs would receive consideration by the BLM.

Outside the RCAs, 6,880 acres adjacent to Petrified Forest National Park and 615 acres adjacent to the Tucson Mountain District of Saguaro National Monument would be retained pending Congressional action to include any of these parcels in the U.S. Park System. A total of 23,600 acres outside the RCAs would also be retained to be included in the Cooperative Recreation Management Areas proposed under Issue 5 - Recreation Management.

Also outside the RCAs, 391,803 acres of public land (surface estate) have been identified as suitable for disposal through the state indemnity selection program or state or private exchange. An additional **45,000** acres have been identified as suitable for disposal through state indemnity selection, state or private exchange or sale.

All land identified as meeting the FLPMA criteria for disposal by sale is identified by tract in Appendix 1 of the draft RMP/EIS.

All disposal land lies outside the RCAs. The land is mostly scattered parcels exhibiting few or low natural resource values. However, some of the identified land has a high economic value and is being identified for exchange so that it may be used to consolidate public ownership within the RCAs. The BLM may use some of the disposal land to acquire land outside the RMP area but within Arizona; however, the blocking up of the RCAs within the RMP area would receive priority.

Under the Proposed RMP, the BLM would consolidate surface and subsurface ownership through the acquisition by exchange of nonfederal mineral estate underlying federal surface holdings. Within the RCAs, Cooperative Recreation Management Areas (CRMAs) and Recreation and Public Purposes (R&PP) leases, the BLM would retain all federal subsurface mineral estate and acquire through exchange all nonfederal subsurface estate underlying that land.

The Proposed RMP also identifies for disposal all subsurface mineral estate that underlies federal surface estate identified for disposal. Therefore, under this alternative, all subsurface mineral estate outside the RCAs, CRMAs and R&PP land would be made available for disposal.

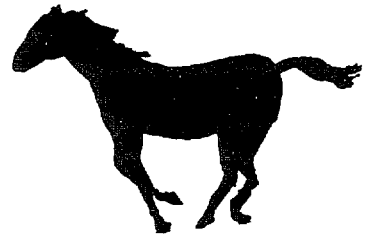


FIGURE 2-1

BLM LAND EXCHANGE PROCESS

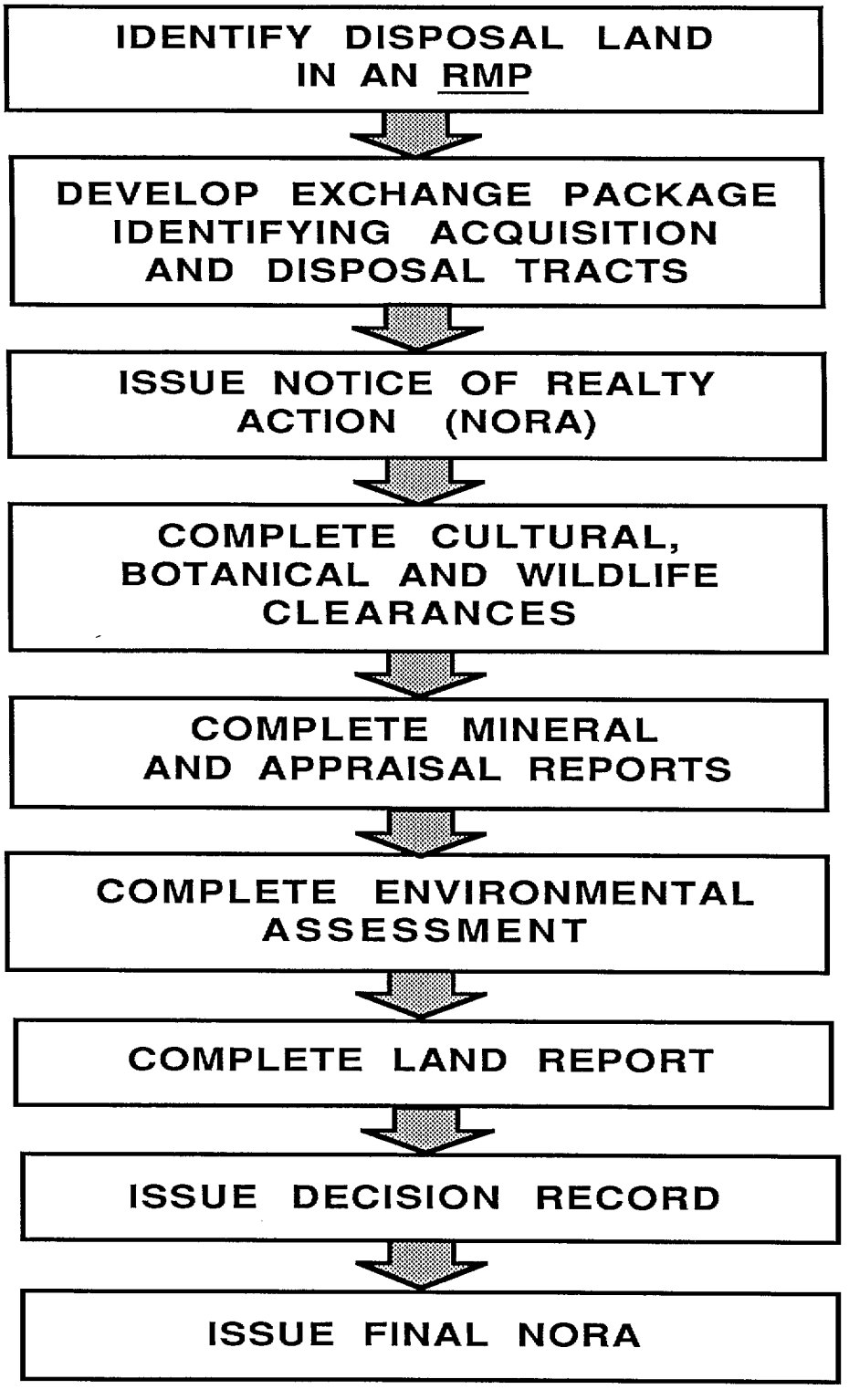
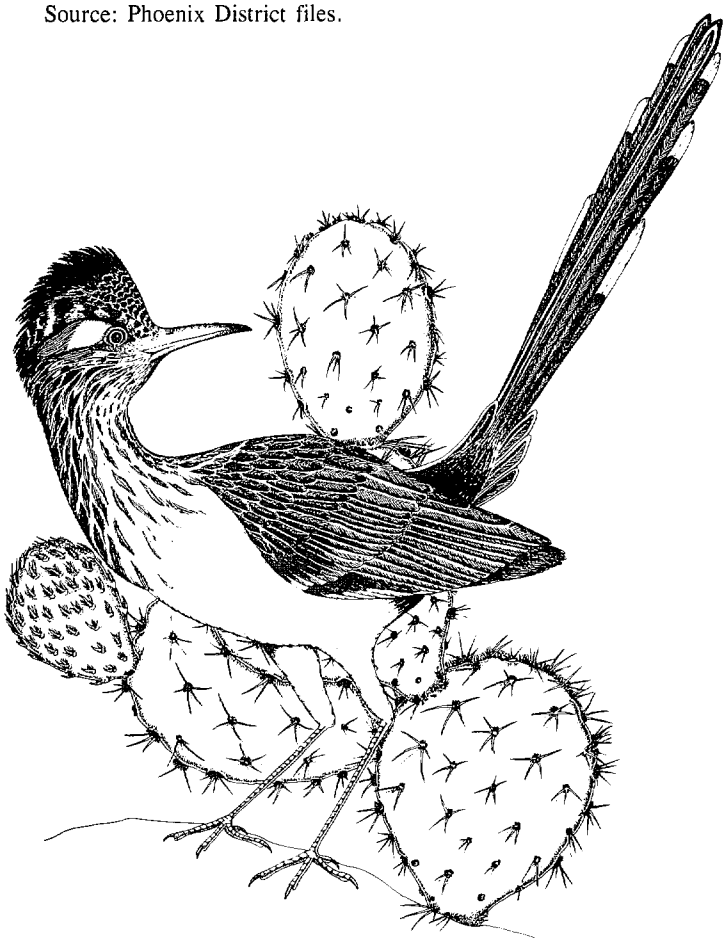


TABLE 2-1
Resource Conservation Areas
Bureau of Land Management, Phoenix District, Arizona

RCA	Federal Surface (acres)	State Surface (acres)	Private Surface (acres)	Total (acres)
Baboquivari	9,500	20,440	7,540	37,480
Silver Bell	104,176	2,054	13,884	150,114
Picacho Mountains	6,400	**7,980**	**0**	**14,380**
White Canyon	**132,400**	**97,980**	**32,420**	**262,800**
Black Canyon	**34,490**	**73,440**	**15,050**	**122,980**
Lake Pleasant	**149,560**	**97,640**	**49,880**	**297,080**
Tanner Wash	**950**	1,280	**2,420**	**4,650**
TOTAL ACRES	**437,476**	**330,814**	**121,194**	**889,484**

Source: Phoenix District files.



Issue 2 - Utility Corridors and Communication Sites

Under the Proposed RMP, seven utility corridors would be designated. Maps 2-11 through 2-13 at the end of this chapter show the routes of each corridor. These corridors identify priority routes for major utility systems. All the corridors except for the Black Canyon corridor would be one mile in width. The Black Canyon corridor would be two miles wide to prevent overcrowding.

Generally, the corridors are routed either along existing utility systems or are routed so as to avoid known high resource value areas. Routes for the corridors are identified only within the RCAs because public land outside the RCAs is so scattered that designation of useful corridors is impractical.

The recommended utility corridors identify the BLM's preferred utility systems routings. However, with the exception of those areas identified in this RMP as closed to right-of-way development, the RMP area is generally open to right-of-way development on a case-by-case basis.

Under the Proposed RMP, five communication sites would be designated. Two of these, Confidence Peak and the Kelvin site, were identified in the 1974 Silver Bell and 1976 Middle Gila Management Framework Plans (MFPs). These already designated sites would continue to be managed for communication facilities under the Proposed RMP and Newman Peak (site development dependent upon congressional determination of wilderness suitability), Pan Quemado Peak and the White Tank Mountains would be formally designated as communication sites. Table 2-2 shows each of the recommended communication sites.

TABLE 2-2
Communication Sites
Bureau of Land Management, Phoenix District, Arizona

Name	Location	Acres
White Tanks	T. 3 N., R. 3 W., section 27, 28	50
Newman Peak	T. 8 S., R. 9 E., section 15, 22, 27	60
Confidence Peak	T. 12 S., R. 8 E., section 3	20
Kelvin Site	T. 4 S, R. 13 E., section 19	25
Pan Quemado	T. 13 S., R. 9 E., section 1, 2, 11, 12 T. 14 S., R. 9 E., section 35	160

Source: Phoenix District Files

Under the Proposed RMP, communication facility placement within the RCAs would be allowed only on the four designated sites (the White Tanks site is outside an RCA). Land identified for disposal would generally be left open for communication site development on a case-by-case basis. Thus, the BLM would consider site applications on this disposal land until such time as disposal takes place.

Issue 3 - Areas of Critical Environmental Concern (ACECs) and Special Management Areas

Under the Proposed RMP, six ACECs encompassing **10,121** acres of public land would be designated. An additional 2,600 acres of state and **3,680** acres of private land within these six ACEC boundaries would be designated upon acquisition. Also under the Proposed RMP, 9,440 acres of federal and state land on Perry Mesa would be designated as an ACEC upon the acquisition of the state land. Management prescriptions and acreages for each ACEC are shown in Table 2-3. Maps 2-14 through 2-19 show the boundaries of each ACEC.

Each ACEC recommended under the Proposed RMP was nominated for such a designation either by the public or by the BLM planning team. The planning team determined that each meets the relevance and importance criteria required by the BLM planning regulations (CFR 1610.7-2 (a)).

Under the Proposed RMP, 19 special management areas (SMAs) would be designated. Although these areas do not meet the relevance and importance criteria established for designation as ACECs, they do contain important resource values that would benefit from some type of enhanced management. All SMAs are within the seven resource conservation areas identified under this Proposed RMP. Table 2-4 describes each SMA, provides information on the management goals for each SMA and describes actions that are planned to attain those goals. Maps 2-20 through 2-25 show the boundaries of each SMA under the Proposed RMP. Two SMAs, the Middle Gila Cultural Resource Management Area and the Gila River Riparian Management Area, are on land currently under withdrawal. Actions in these SMAs would only be implemented in cooperation with the agency that currently manages the withdrawn land.

Table 2-4 shows that seven of the 19 SMAs would be designated as multiple resource management areas. These contain nine grazing allotments for which the BLM would develop coordinated resource management plans (CRMPs) to provide direction for managing all the significant resources within the allotments. The nine allotments were chosen by the BLM's interdisciplinary planning team for CRMP development because all contain significant resource values that would benefit from intensive management. Appendix 4 of the draft RMP/EIS shows the relevant resource values in each of the nine allotments.

Allotments receiving priority for special management are those exhibiting significant potential for range and watershed improvement. Some also have key riparian, protected plant or wildlife habitat. While other allotments might benefit from a CRMP, these nine are all the BLM can realistically include within this planning cycle.

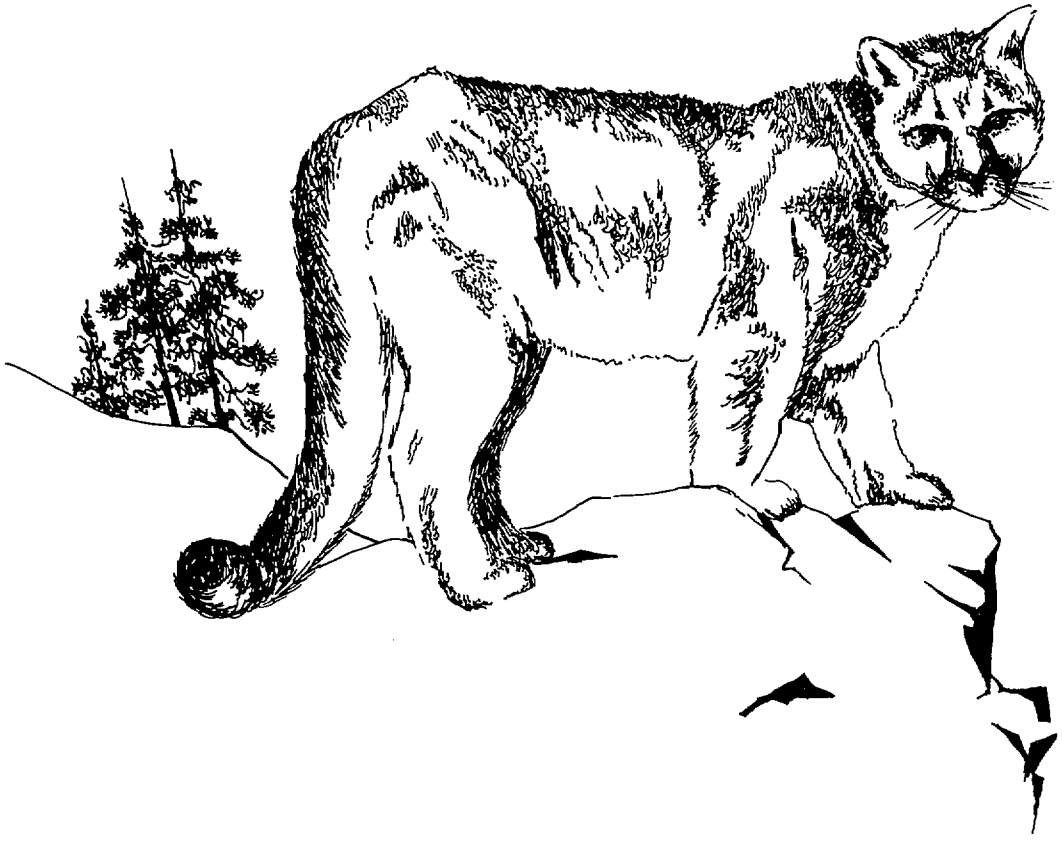


TABLE 2-3

Areas Proposed for ACEC Designation
Bureau of Land Management, Phoenix District, Arizona

Proposed Name	Federal, State, Private Acres	Current Designation or Classification	Importance	Relevance	Planned* Actions
Baboquivari Peak ACEC	F 2,070 S 240 P 720 3,030	Public land portion (2,070 acres) a wilderness study area; recommended for wilderness designation in the Phoenix Wilderness FEIS	Outstanding natural landmark with significant wildlife, botanical and cultural value	Great religious significance to Tohono O'Odham Indians	Designate an ACEC; close to motorized vehicles; prohibit land use authorizations; acquire 960 acres; obtain legal access; initiate mineral withdrawal** on all federal subsurface (2,900 ac.); develop activity plan; prohibit surface occupancy for oil/gas development.
Waterman Mountains ACEC	F 1,960 S 600 P 540 3,100	1,960 public acres identified in 1986 HMP as endangered species habitat	Habitat supports a federally listed endangered plant	One of two localities in U.S.; major threat from mining activity identified	Designate an ACEC; limit motorized vehicles to designated roads and trails; prohibit land use authorizations except along existing roads; acquire 1,140 acres; initiate mineral withdrawal on all 2,320 ac. federal subsurface; implement approved HMP; prohibit surface occupancy for oil/gas development.
White Canyon ACEC	F 1,920 S 480 2,400	1,920 public acres within the White Canyon Wilderness Study Area; recommended not suitable for wilderness in Phoenix Wilderness FEIS	Outstanding scenic, wildlife and cultural values	Mineral exploration identified as potential threat; public and management interest in preserving scenic and riparian values	Designate an ACEC; close White Canyon to motorized vehicles and limit motorized travel elsewhere to designated roads and trails; prohibit land use authorizations; acquire 480 acres; develop an activity plan; prohibit surface occupancy for oil/gas development.
Larry Canyon ACEC	F 80 80		Rare pristine riparian deciduous forest within desert ecosystem	Special features of considerable value for studies of a desert riparian system	Designate an ACEC; close entire area to motorized vehicles; prohibit land use authorizations; initiate mineral withdrawal on 80 ac. federal subsurface; develop an activity plan; prohibit domestic livestock grazing; prohibit surface occupancy for oil/gas development.

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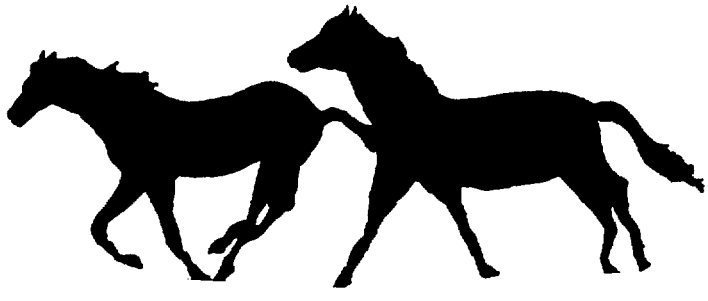


TABLE 2-3 (continued)
Areas Proposed for ACEC Designation
Bureau of Land Management, Phoenix District, Arizona

Proposed Name	Federal, State, Private Acres	Current Designation or Classification	Importance	Relevance	Planned* Actions
Tanner Wash ACEC	F 950 S 1,280 P 2,420 4,650	420 public acres identified in 1985 HMP as endangered species habitat	Habitat supports a federally listed endangered plant	Only locality known for the plant; collecting pressures, urbanization and grazing identified threats	Designate an ACEC; close 30 acres to motorized vehicles; limit motorized travel elsewhere to designated roads and trails; prohibit land use authorizations; acquire land; initiate mineral withdrawal on all federal subsurface (950 ac.); continue to implement HMP; prohibit surface occupancy for oil/gas development.
Appleton-Whittell ACEC	F 3,141 3,141	Public land portion of the Appleton-Whittell Biological Research Sanctuary managed by National Audubon Society	Unique laboratory for studying effects of nongrazing on a desert grassland	Management objective to cooperate in research objecjectives of the Research Ranch	Designate an ACEC; limit motorized vehicles to designated roads and trails; prohibit land use actions except as authorized by Research Ranch; do not open to mineral location, leasing or sales; implement 1986 BLM/National Audubon Society MOU; prohibit surface occupancy for oil/gas lease development.
Perry Mesa ACEC	F 960 S 8,480 9,440	960 public acres are a National Register Archaeological District	Exhibits a unique blend of three prehistoric cultures	Vandalism identified as serious threat	Designate ACEC upon acquisition of 8,480 state acres; limit motorized vehicles to designated roads/trails; develop an activity plan; acquire 8,484 acres.

Source: Phoenix District files.

*Planned Actions: Planned actions will apply to current land and, upon acquisition, to private and state land.

** Mineral Withdrawal: Subject to valid existing rights, the identified area would be closed to mining claim location, mineral leasing and mineral sales. Unless stated otherwise, nonfederal lands acquired within the ACEC boundary will be closed to operation of the mining laws. Expired leases may not be renewed. Mining claims within the ACEC may be examined for validity and contested if appropriate, as determined by the BLM State Director.

TABLE 2-4

Areas Proposed for Special Management
Bureau of Land Management, Phoenix District, Arizona

Special Management Area (SMA)	Federal, State, and Private Acres	Current Designation	Management Goals	Planned Actions
Coyote Mountains Recreation Management Area	F 5,080 S 320 P 320 5,720	acres BLM WSA; recommended for wilderness designation in 1987 Final Phoenix Wilderness EIS	Manage to enhance recreation values; increase public ownership of state and private holdings	Obtain legal access; develop an activity plan; prohibit land use authorizations; limit vehicular travel to designated roads and trails; prohibit surface occupancy for oil/gas development; acquire land.
Agua Blanco Ranch Multiple Resource Management Area	F 14,419 S&P 2,280 16,699	None	Improve watershed condition to satisfactory; increase soil cover; reduce sediment yield; improve ecological site condition to good; promote recovery of an endangered plant	Develop an activity plan; limit motorized vehicles to existing roads and trails; acquire land.
Cocoraque Butte-Waterman Mtns Multiple Resource Management Area	F 34,749 S&P 13,227 47,976	None	Improve watershed condition to satisfactory; increase soil cover; reduce sediment yield; improve ecological site condition to good; promote recovery of endangered plant	Develop an activity plan; limit motorized vehicles to existing roads and trails; acquire land.
Silver Bell Desert Bighorn Sheep Management Area	F 39,170 S 11,450 P 6,180 56,800	4,460 acres includes Ragged Top WSA, recommended not suitable for wilderness in the Arizona-Mohave Wilderness FEIS	Improve habitat condition for desert bighorn sheep	Develop an activity plan; prohibit surface occupancy for oil/gas development on 800 acres of Ragged Top; limit motorized vehicles to existing roads and trails except close 800 acres on Ragged Top; acquire land.
Avra Valley Cultural Resource Management Area	F 2,720	Contains Cocoraque Butte National Register Historic District	Manage 14 properties for information potential and 1 for conservation values	Develop an activity plan; limit motorized vehicles to existing roads and trails.
Santa Ana del Chiquiburitac	F 20	National Register Historic Places	Manage for public education/interpretative values	Develop an activity plan; close to motorized vehicles. Prohibit surface occupancy for oil/gas development.
Picacho Mountains Desert Tortoise Management Area	F 6,400 S 7,980 14,380	6,400 acres a WSA recommended not suitable for wilderness in Phoenix Wilderness FEIS	Maintain existing desert tortoise populations; obtain population data for high and low elevation	Develop a management plan; acquire land; prohibit surface occupancy of oil/gas leases; close 6,400 ac. to motorized vehicles; limit travel on 7,980 ac. to designated roads.
Grayback Mountain-Box O Wash Multiple Resource Management Area	F 24,045 S&P 16,581 40,626	None	Improve watershed condition to satisfactory; increase soil cover; reduce sediment yield and salinity discharge; improve ecological site condition to good; enhance stream flow and water quality	Develop an activity plan; acquire land; limit motorized vehicles to existing roads and trails.
Reymert Townsite Cultural Resource Management Area	F 20	None	Manage for public education/interpretative values	Develop an activity plan; close to motorized vehicles.
Middle Gila Cultural Resource Management Area	F 21,940 S 7,240 P 1,520 30,700	Under withdrawal for federal water projects	Manage for information, public and conservation values	Develop an activity plan; limit motorized vehicles to existing roads and trails; acquire land.

(continued on next page)

TABLE 2-4 (continued)

Areas Proposed for Special Management
Bureau of Land Management, Phoenix District, Arizona

Special Management Area (SMA)	Federal, State, and Private Acres	Current Designation	Management Goals	Planned Actions
Gila River Riparian Management Area	F 15 miles	Under withdrawal for federal water projects	Improve condition of riparian vegetation and aquatic habitat for native fish; enhance water quality; limit salinity discharges	Develop an activity plan; limit motorized vehicles to existing roads and trails; prohibit surface occupancy for oil/gas development in riparian zone.
Black Canyon Granite Sales Management Area	F 160	None	Manage as a granite extraction area	Develop an activity plan.
Cordes Junction Multiple Resource Management Area	F 8,763 S&P 5,846 14,609	None	Improve watershed condition to satisfactory; improve condition of riparian vegetation; improve native fish habitat; enhance water quality and stream flow; increase soil cover; reduce sediment yield; improve ecologicial site condition to good	Develop an activity plan; prohibit surface occupancy of oil/gas leases in riparian zones; prohibit land use authorizations in riparian areas; limit motorized vehicles to existing roads and trails; acquire land.
Sycamore Creek Multiple Resource Management Area	F 2,423 S&P 1,396 3,819	None	Improve condition of riparian vegetation; improve native fish habitat; enhance stream flow and water quality; increase soil cover and reduce sediment yield; improve pronghorn habitat and facilitate their movement	Develop an activity plan; prohibit surface occupancy for oil/gas development in riparian zones; prohibit land use authorizations in riparian areas; limit motorized vehicles to existing roads and trails; acquire land.
Bumble Bee Multiple Resource Management Area	F 12,832 S&P 39,433 52,265	None	Improve watershed condition to satisfactory; improve condition of riparian vegetation; improve native fish habitat; enhance water quality and stream flow; increase soil cover; reduce sediment yield; improve ecological site condition to good; reintroduce native fish, if feasible	Develop an activity plan; prohibit surface occupancy for oil/gas development in riparian areas; prohibit land use authorizations in riparian areas; limit motorized vehicles to designated roads and trails; acquire land.
Williams Mesa Multiple Resource Management Area	F 27,384 S&P 23,346 59,735	None	Improve watershed condition to satisfactory; improve riparian vegetation condition; improve native fish habitat and reintroduce native fish, if feasible; enhance stream flow and water quality; increase soil cover; reduce sediment yield; improve ecological site condition to good	Develop an activity plan; prohibit surface occupancy for oil/gas development in riparian areas; prohibit land use authorizations in riparian areas; close 3.5 miles of Tule Creek to motorized vehicles, elsewhere limited to existing roads and trails; acquire land.
Hassayampa River Riparian Management Area	F 12 miles S 4 miles 16 miles	Part of Hassayampa River WSA; recommended not suitable for wilderness designation in 1987 Final Phoenix Wilderness EIS	Improve condition of riparian habitat; improve condition of native fish habitat and reintroduce native fish, if feasible; enhance water quality	Develop an activity plan; limit motorized vehicles to existing roads and trails; prohibit surface occupancy for oil/gas leases in riparian areas; prohibit land use authorizations in riparian areas; acquire land.
Hells Canyon Recreation Management Area	F 9,379 S 640 P 720 10,739	9,379 acres WSA; recommended not suitable for wilderness designation in Phoenix Wilderness FEIS	Manage to maintain primitive recreation values	Develop an activity plan; limit motorized vehicles to designated roads and trails; acquire land.
Lake Pleasant Burro Herd Management Area	F 57,412 S 13,795 P 9,593 80,800	None	Maintain habitat for burros; maintain an 80-animal herd	Develop a herd management plan; acquire land.

Source: Phoenix District files.

Issue 4 - Off-Road Vehicle Designations

Under the Proposed RMP, vehicular travel would be limited to existing roads and trails on all the RMP area's public land with the exception of those areas specifically identified as closed **or where travel would be limited to designated roads and trails.**

A total of 11,761 acres and 6.5 miles of existing roads or trails would be closed to vehicular traffic under this alternative. The closed areas **and areas where vehicular travel would be limited to designated roads and trails** are listed under the appropriate ACEC or special management area recommendations in Tables 2-3 and 2-4.

Issue 5 - Recreation Management

Under the Proposed RMP, the Coyote Mountains and Hells Canyon would become BLM special recreation management areas (see Maps 2-20 and 2-25). Table 2-4 describes the management goals and planned actions the BLM would take to enhance recreation opportunities in these two areas. The Coyote Mountains and Hells Canyon are now wilderness study areas (WSAs). Management of these two WSAs as recreation management areas would occur only if the two areas are not designated wilderness by Congress.

Table 2-5 identifies land slated for development as Cooperative Recreation Management Areas (CRMAs). Five CRMAs would be established under the Proposed RMP (see Maps 2-26 through 2-30 at the end of this chapter).

These CRMAs exhibit significant recreation values and have been identified by county and state governments as important areas for intensive recreation uses. For each of these CRMAs, the BLM and the cooperating government agency would jointly develop a cooperative management agreement detailing the role of each in managing recreation activities in the CRMA.

The areas recommended for CRMA designation and acreages are as follows:

1. **Lake Pleasant** — 6,760 acres BLM; 29,840 acres state; 3,260 acres private. The BLM, Bureau of Reclamation (BOR) and Maricopa County would work to acquire up to 29,360 state acres and 2,140 acres of private land.
2. **San Tan Mountains** — 6,880 - BLM, **480 - state**, 0 - private. The BLM would work to acquire **480 state acres**.
3. **Black Canyon Trails** — 3,534 - BLM, 0 - state, 0 - private.
4. **Tortolita Mountains** — 1,560 - BLM, 9,480 - state, 6,440 - private. The BLM would work to acquire up to 2,790 state acres.
5. **Sawtooth Mountains** — 15,188 - BLM, 640 - state, 0 - private. The BLM would work to acquire 640 acres of state land.

Under the Proposed RMP, several parcels would be slated for transfer to local governments or agencies under the R&PPA. This land would initially be retained in federal ownership until such time as the grantee files an R&PP lease application and has an approved plan of development for those parcels. Table 2-5 identifies the land scheduled for transfer under the R&PP Act. Land recommended for R&PPA transfer was identified by local government entities during the RMP scoping process. Land recommended for R&PPA transfer under the Proposed RMP includes: 1) Goldfield, to the City of Apache Junction for park development (1,140 acres), 2) Saginaw Hill (460 acres) and Tucson Mountain Park Extension **(600 acres)**, to Pima County for park development and 3) Picacho Reservoir (350 acres) and Zion Reservoir (280 acres), to the Arizona Game and Fish Department for the protection of wildlife values (see maps 2-31 through 2-34 at the end of this chapter).

TABLE 2-5
CRMA and R&PP Land
Bureau of Land Management, Phoenix District, Arizona

Parcel	Proposed RMP
Black Canyon Trails	CRMA*
Lake Pleasant	CRMA
San Tan Mountains	CRMA
Tortolita Mountains	CRMA
Picacho Reservoir	R&PPA**
Goldfield	R&PPA
Zion Reservoir	R&PPA
Saginaw Hill	R&PPA
Tucson Mountain Park Ext.	R&PPA
Sawtooth Mountains	CRMA

*CRMA - A Cooperative Recreation Management Area where the BLM enters into a cooperative management agreement with a local government agency to manage recreation land.

**R&PPA - Recreation and Public Purpose Act under which the BLM transfers title of a parcel to a managing agency. This land must be used for public purposes by the grantee.

Source: Phoenix District files.

Issue 6 - Land Classifications

The RMP area is currently encumbered by five multiple use classifications affecting 12,177 acres. Under the Proposed RMP, the five classifications identified in Table 2-6 would be terminated.

Land currently under these classifications would return to multiple use management and would be managed under the guidance of this RMP.

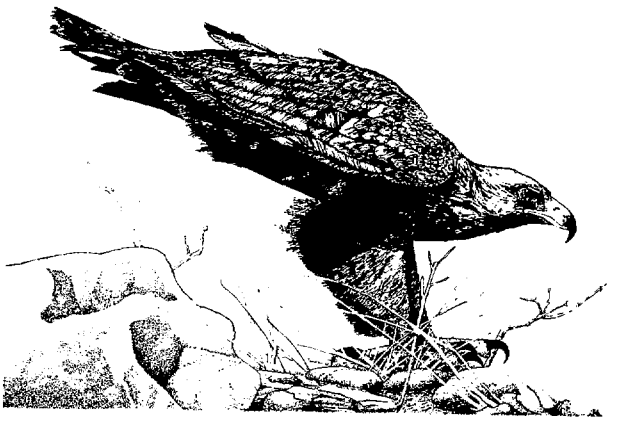


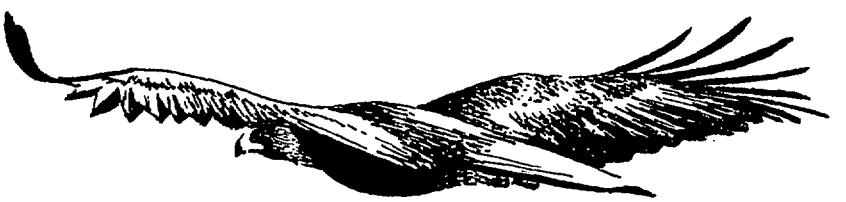
TABLE 2-6
Multiple Use Classifications Recommended for Revocation
Bureau of Land Management, Phoenix District, Arizona

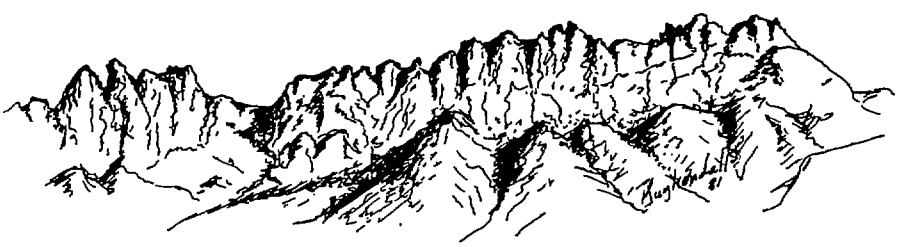
Serial Number	Acres	Classification Date	Segregated From
A-662 (Oracle Junction)	2,974	12-14-1967	Agricultural Laws, Private Exchange, State Selection, Mining, State Exchange, RS 2455 Sales
A-918 (Coyote Mountains)	5,083	11-18-1967	Agricultural Laws, Private Exchange, RS 2455 Sales, State Selection, Act: 09-19-1964 Sale
*A-922 (Fred J. Weiler Greenbelt)	437	08-31-1967	Agricultural Laws, RS 2455 Sales, Private Exchange, State Exchange, State Selection, RS 2477, Mining Laws
A-1821 (Baboquivari Mountains)	3,657	12-12-1969	Agricultural Laws, RS 2455 Sales, Act: 09-19-1964 Sale
**A-1029 (Lost Dutchman State Park)	26	10-06-1967	Agricultural Laws, RS 2455 Sales, Act: 09-19-1964 Sale, R&PP Act, Private Exchange, State Exchange, State Selection, RS 2477, Mining Laws

* This area is and would remain under PLO 1015 withdrawal to benefit wildlife.

** This area has been transferred to the state under the R&PPA.

Source: Phoenix District files.





Proposed RMP And Draft Preferred Alternative Compared

The Proposed RMP differs from the preferred alternative described in the draft RMP/EIS primarily in the configuration and size of several proposed RCAs. These differences are shown in Table 2-7 and on Maps 2-6 through 2-10 at the end of this chapter when compared with the same numbered maps in the draft RMP/EIS.

TABLE 2-7
RCA Acres Compared
Bureau of Land Management Phoenix District, Arizona

RCA	Draft Preferred Alternative	Proposed RMP
Baboquivari	37,480	No change
Silver Bell	150,114	No change
Picacho Mountains	6,400	14,380
White Canyon	330,770	262,800
Black Canyon	117,780	122,980
Lake Pleasant	275,290	297,080
Tanner Wash	3,740	4,650
TOTAL ACRES	921,574	889,484

Source: Phoenix District files.

White Canyon RCA acreages are decreased under the Proposed RMP while those of the other proposed RCAs remain unchanged or are increased. The decrease under the White Canyon proposal was made because the Arizona State Land Department is unwilling to consider the exchange of its land in the southwest corner of the RCA as proposed in the draft plan's preferred alternative. Without the possibility of acquiring this state land, the public land in the same region would be isolated from the rest of the proposed RCA. The decision to identify this isolated block of public land for disposal in the Proposed RMP was made when the state declared its willingness to exchange additional land to support expanded boundaries for several of the other proposed RCAs. The acquisition of additional desert tortoise habitat (Picacho Mountains RCA) and riparian areas (Lake Pleasant and Black Canyon RCAs), for instance, would be possible only by identifying additional public land for disposal.

Junegrass

Monitoring And Evaluating The Proposed RMP

The effect on the environmental issues of implementing the Proposed RMP would be monitored and evaluated according to the schedule and methods shown in Table 2-8. Other environmental values, not now considered issues, would be incorporated into the plan through the amendment process and formally monitored if these values deteriorated significantly during the life of the RMP.

TABLE 2-8

Resource Monitoring and Evaluation Plan
Bureau of Land Management, Phoenix District, Arizona

Element	Item	Location	Technique	Unit of Measure	Frequency & Duration	Information Warranting Review of Decision or Activity Plan
Minerals	Material sales	Black Canyon Community pit	Standardized appraisal methods.	Tons	Annually	Depletion of material from pit area
	Mineral exploration and development	WSAs, ACECs and SMAs	Site inspection	Acres of disturbance	Same	Adverse impacts to protected resources and values
Cultural Resources	Site vandalism (including ORV damage)	Perry Mesa ACEC, Santa Ana del - Chiquiburitac, Reymert, Middle Gila, Avra Valley	Site inspection (air and ground); photo documentation	Number of sites disturbed/major disturbances on given site	Annually	Trends indicating increased disturbance (e.g., ground disturbance, structural damage)
	Natural degradation	Same	Site inspection (ground); photo - documentation of sensitive portions of selected properties	Number of deteriorating features	Same	Significent site deterioration
Watershed	Soil loss	9 allotments in 7 SMAs	Paired[1] runoff plots	Tons/ac./yr.	Biannually; Apr./Oct.	Soil loss not reduced in treated areas
		Same	USLE[2] transect	Same	Same	Same
Water	Quality	Riparian areas within ACECs and SMAs	Field and/or laboratory analysis	Constituent (pH, parts/million, etc.) compared to quality standards	Biennially	Progressive decline in water quality below AZ standards.
	Quantity	Same	Stream gauging	Flow (cfs.)	Same	Change in flow to ephemeral
Rangeland Vegetation	Condition	9 allotments in 7 SMAs	As outlined in SCS National Range Handbook,Sec. 305[3]	% production to climax allowance	5 year intervals	Condition decline
	Trend	Same	Pace frequency[4]	Species/frequency	End of each grazing cycle	20% decline in key plant species
	Utilization	Same	Key forage plant (shrubs); grazed class (grasses and forbs)[5]	Percent forage removed	End of each use period	Grass utilization greater than 50%
Special Status Plants	Population stability	Habitat areawide	Field survey	Occurrence, number of counts, density, age/class, distribution	Annually	Five-year downward trend in population numbers, age/class disparity, shrinking distribution, range contraction
	Habitat evaluation	Same	Site inspection of habitat	Acres of occupied habitat	Same	Significant habitat loss
Burros	Population	Herd area	Helicopter mark recount	No. of individuals	3-year intervals	20% change in population; less than 10% juveniles
	Forage use	Same	Key forage plant method	% forage removed	Annually	Grass utilization greater than 50%

(continued on next page)

TABLE 2-8 (Continued)

Resource Monitoring and Evaluation Plan
Bureau of Land Management, Phoenix District, Arizona

Element	Item	Location	Technique	Unit of Measure	Frequency & Duration	Information Warranting Review of Decision or Activity Plan
Gila Top-minnow/ Desert Pupfish	Observation of breeding populations	Mesquite Spring, Tule Creek, introduction sites	Direct observation	Number per site	Annually	Observable decrease in fish populations
Desert Bighorn Sheep	Population estimate	Silver Bell Mountains SMA	AG&FD population survey information	Number/sq. mi.	Same	Significant population decline
Desert Tortoise	Relative densities	Category I & II habitats	Square mile plots[6]	Same	5-year intervals	Change in habitat category
	Habitat condition	Category I & II habitats	Pace frequency[4]	Percent cover composition	5 to 7 year intervals	Change in habitat category
Pronghorn	Population estimate	Sycamore Mesa SMA	AG&FD population survey information	Numbers/sq. mi.	Annually	Significant population decline
Mule Deer	Same	Medium to high density habitat	Same	Same	Same	Same
Javelina	Same	Same	Same	Same	Same	Same
Riparian Areas	Ecological condition	14 drainages in 8 SMAs	PDO riparian area condition evaluation	Miles	5-year intervals	Decline in condition class
Recreation	ERMAs	Area-wide	Patrol, area inspections	Visitor days	Biennially	Data reveals significant user conflicts
	SMAs	Coyote Mtns./ Hells Canyon	Patrol, visitor registration, traffic counters	Same	Weekly in heavy use periods then monthly	Data indicates visitor use significantly higher than expected
	ORV management	Closed and designated areas	Aerial reconnaissance and ground patrol	No. of violations	Biannually	Repeated violations noted
	CRMAs	Five CRMAs	Cooperative plan review	Plans completed	Annually	Failure to implement cooperative management plan

Source: Phoenix District files.
[1]USDI. A Runoff and Soil-Loss Monitoring Technique using Paired Plots. Technical Note 368. Denver, Colorado. August 1985.
[2]USDA. Universal Soil Loss Equation. Conservation Planning Note No. 11, Arizona. Phoenix, Arizona. September 1976.
[3]USDA. Soil Conservation Service. 1976. *National Range Handbook*. Washington, D.C.
[4]USDI. Bureau of Land Management. 1985. *Rangeland Monitoring Trend Studies*. T.R. 4400-4. Denver, Colorado.
[5]USDI. Bureau of Land Management. 1984. *Rangeland Monitoring Utilization Studies*. T.R. 4400-3. Denver, Colorado.
[6]USDI. Bureau of Land Management. 1988. Draft Desert Tortoise Implementation Strategy. Phoenix, Arizona.

Alternatives Considered But Not Analyzed

Several alternatives in addition to the four chosen for study in the draft RMP/EIS and this Proposed RMP alternative were considered, but each was dropped for various reasons. The alternatives that were considered but not chosen for study are addressed below under the appropriate planning issue:

Land Tenure Adjustment

Several land tenure adjustment alternatives to the four chosen for study were considered but were eliminated from further analysis. Each of these alternatives centered on the acquisition and retention of land in the RMP area.

In Apache and Navajo counties, alternatives were considered to acquire and attempt to block-up pronghorn antelope habitat and significant cultural areas. These alternatives would have required complex trades among the BLM, the Arizona State Land Department and numerous private owners. Because of the complexities involved in making these trades, the BLM determined that consolidation of enough land to make contiguous blocks would be impractical. Therefore, this alternative was not considered for further study.

Alternatives were also considered whereby the BLM would block up ownership in the Sierrita and Las Guijas mountains in the RMP area's southern portion. While each of these areas contains important resource values, the federal government is a minority landowner in the two mountains. This, coupled with the fact that the mountains have many different private owners, makes the acquisition of large blocks impractical and precludes these two areas from further consideration.

Utility Corridors and Communication Sites

A utility corridor alternative that would have followed all routes recommended in the 1986 Western Utility Group Study (Western Utility Group, 1986) was considered. Consideration of all the identified corridors would have placed corridors across highly scattered land with only small amounts of publicly owned land. Such corridors would not be useful as the vast majority of the land traversed in these corridors would be nonfederal and the BLM would exert little control over utility system routings. Therefore, this alternative was dropped from further consideration.

An additional alternative was considered that would provide two designated corridors in the Black Canyon area. One corridor would have followed Interstate 17 while the other would follow existing transmission lines on Perry Mesa. It was determined that one route through Black Canyon would provide sufficient routings for all anticipated utility systems. Therefore, an alternative with two corridors in the Black Canyon area was dropped from further consideration.

Areas of Critical Environmental Concern and Special Management Areas

The interdisciplinary planning team considered ACEC designation for six areas that were not analyzed in any of the alternatives chosen for study in this RMP/EIS. Each of these six areas was considered for ACEC designation; however, the planning team felt that the resource values present in each of the areas did not meet the relevance and/or importance criteria required for ACEC designation (CFR 1610.7-2). Nominations for ACECs considered but rejected by the planning team include Owl Head Butte, Ragged Top, Sawtooth Mountains, Cedar Basin, Tule Spring and the Middle Gila Archaeological Zone.

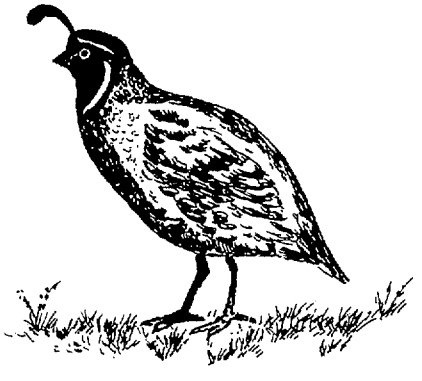
The designation of several special management areas on land identified for disposal was considered. However, the planning team felt that any special management measures taken by the BLM should only occur on land slated for retention. Therefore, any SMA recommendations made on land slated for disposal were not considered in any alternative.

Off-Road Vehicle Designations

An alternative was considered that would have closed all public land to motorized vehicle travel unless the area was signed as being open to such travel. Implementation of this alternative was deemed impractical because the RMP area's numerous public roadways crossing scattered public land preclude an effective signing program.

Recreation Management

An alternative was considered that would have identified several additional special recreation management areas. The Hassayampa River Canyon and the Sawtooth, San Tan, Picacho and Ragged Top mountains were all considered for designation as special recreation management areas. However, while these areas contain high value recreation resources, it was determined that the areas do not meet the criteria necessary for such a designation. Therefore, these areas were dropped from further analysis.

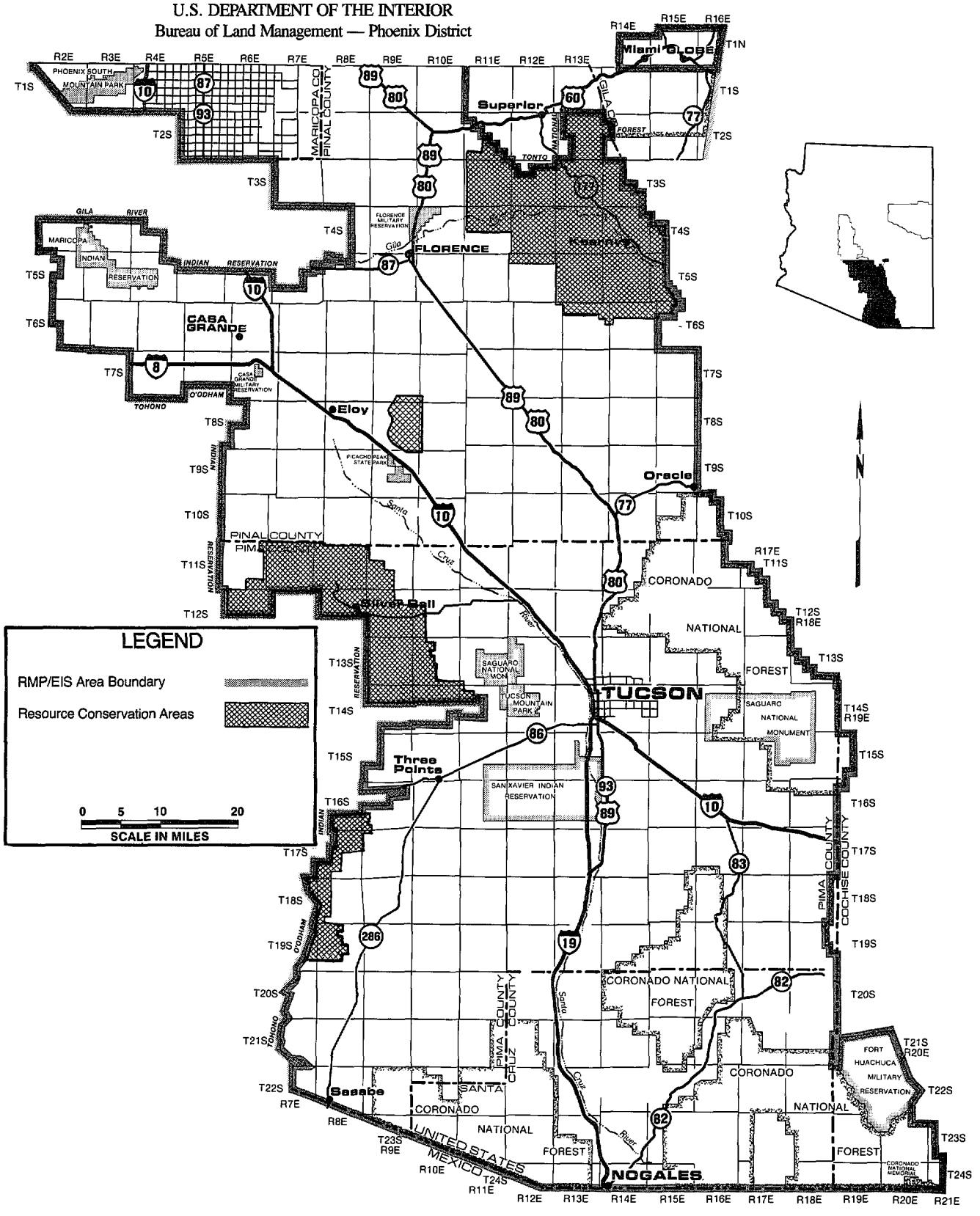


RESOURCE CONSERVATION AREAS (OVERVIEW)

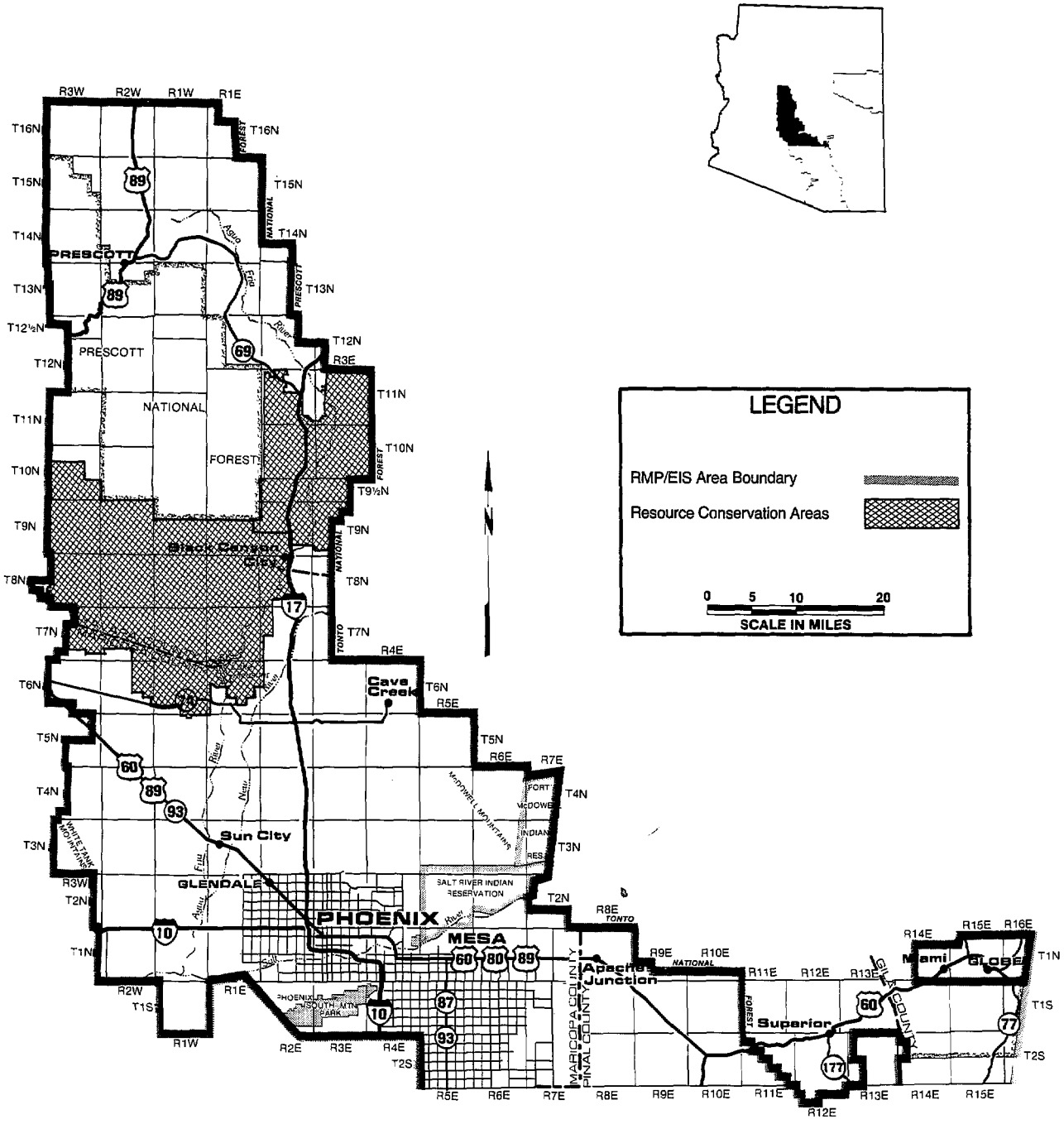
MAP NUMBER	NAME
2–1	SOUTH CENTRAL PORTION RCAs
2–2	NORTH CENTRAL PORTION RCAs
2–3	APACHE-NAVAJO PORTION RCAs

MAP 2-1
RESOURCE CONSERVATION AREAS (RCAs)
(SOUTH CENTRAL PORTION)

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management — Phoenix District

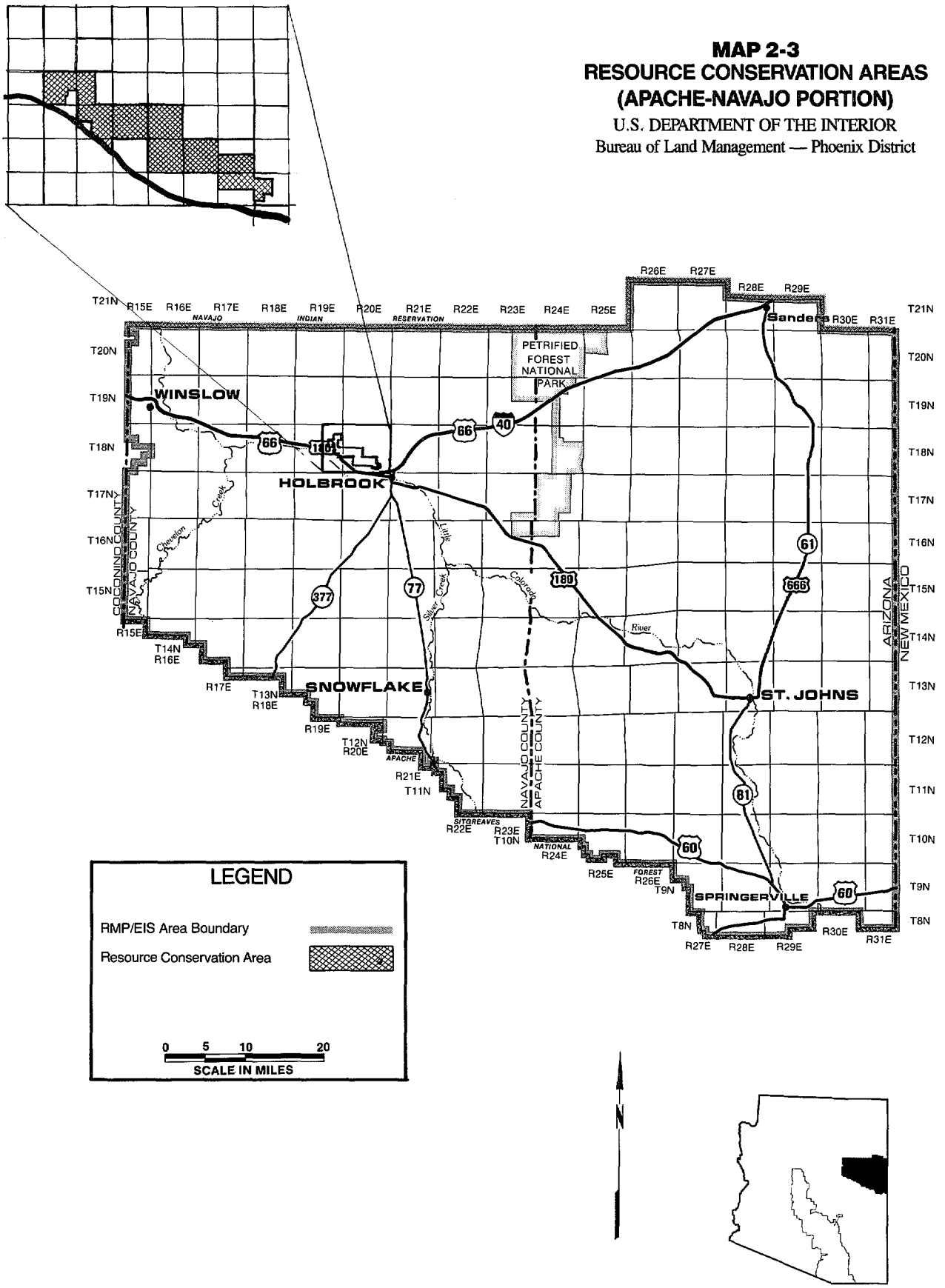


MAP 2-2
RESOURCE CONSERVATION AREAS
(NORTH CENTRAL PORTION)
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management — Phoenix District



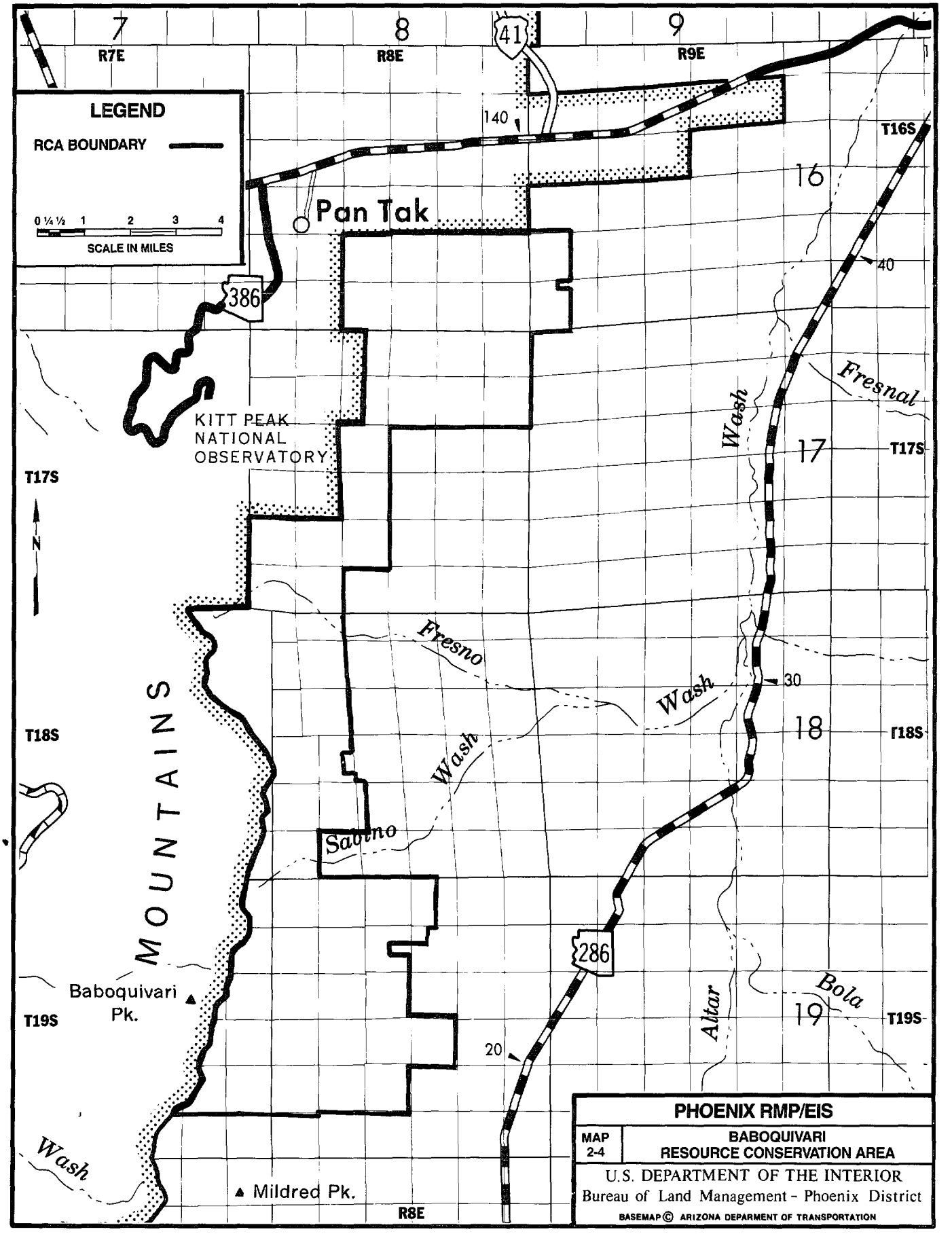
MAP 2-3
RESOURCE CONSERVATION AREAS
(APACHE-NAVAJO PORTION)

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management — Phoenix District



RESOURCE CONSERVATION AREAS (DETAIL MAPS)

MAP NUMBER	NAME
2–4	BABOQUIVARI
2–5	SILVER BELL
2–6	PICACHO MOUNTAINS
2–7	WHITE CANYON
2–8	BLACK CANYON
2–9	LAKE PLEASANT
2–10	TANNER WASH


LEGEND
RCA BOUNDARY
0 ¼ ½ 1 2 3 4
SCALE IN MILES
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R7E
R8E
R9E
41
140
T16S
16
Pan Tak
40
386
KITT PEAK
NATIONAL
OBSERVATORY
Fresnal
Wash
17
T17S
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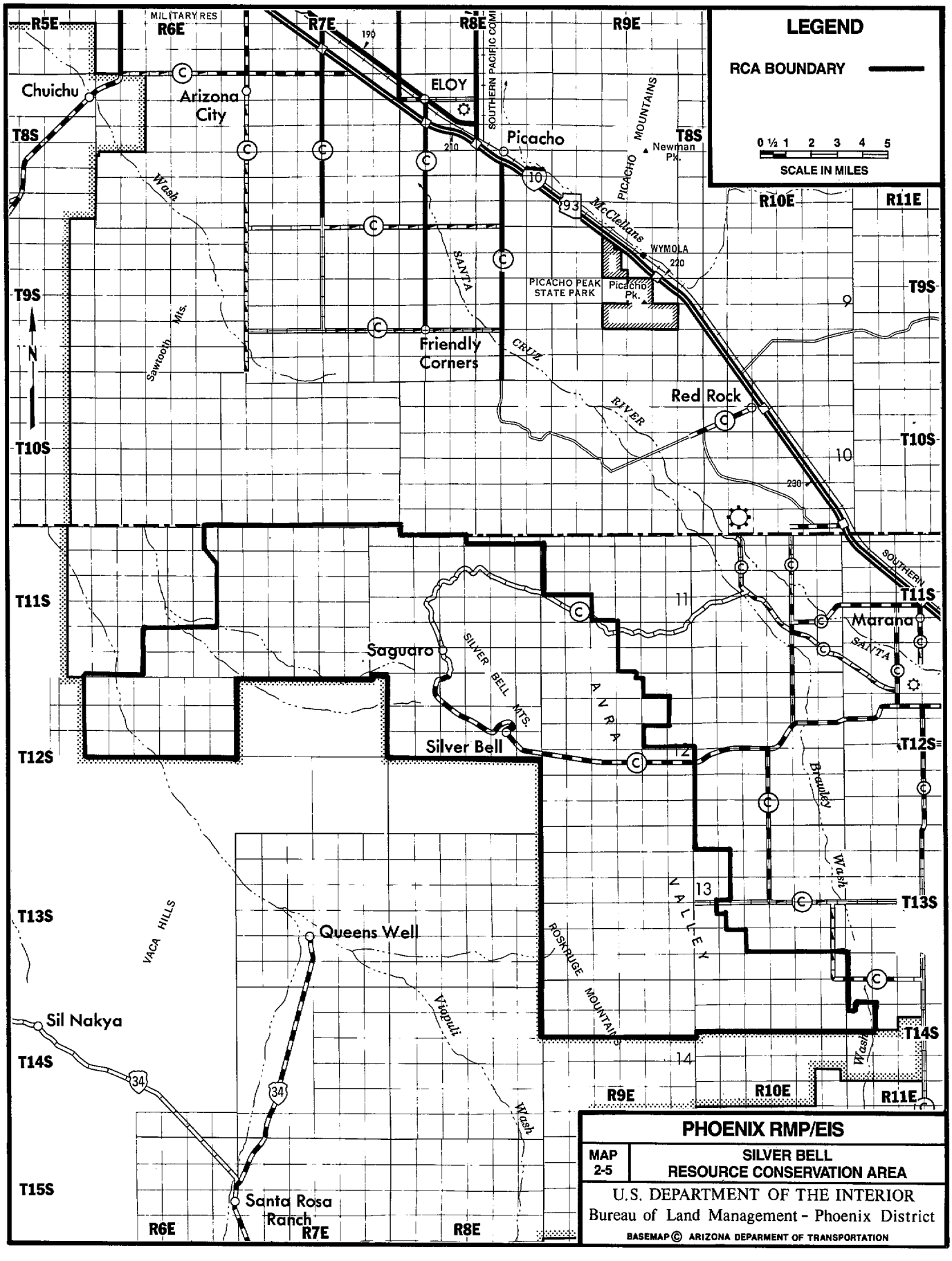
Fresno
Wash
30
18
T18S
T18S
Wash
Sabino
MOUNTAINS
286
Baboquivari
Pk.
T19S
Bola
19
T19S
Altar
20
Wash
Mildred Pk.
R8E
PHOENIX RMP/EIS
MAP 2-4
BABOQUIVARI
RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
BASEMAP © ARIZONA DEPARMENT OF TRANSPORTATION


LEGEND
RCA BOUNDARY
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SCALE IN MILES
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Arizona City
ELOY
SOUTHERN PACIFIC COMI
Picacho
PICACHO MOUNTAINS
Newman Pk.
McClellans
WYMOLA
PICACHO PEAK STATE PARK
Picacho Pk.
SANTA CRUZ RIVER
Wash
Sawtooth Mts.
Friendly Corners
Red Rock
SOUTHERN
Marana
SANTA
Saguaro
SILVER BELL MTS.
Silver Bell
AVRA VALLEY
Brawley Wash
VACA HILLS
Queens Well
ROSKRUGE MOUNTAIN
Vaiputi Wash
Sil Nakya
Santa Rosa Ranch
PHOENIX RMP/EIS
MAP 2-5
SILVER BELL RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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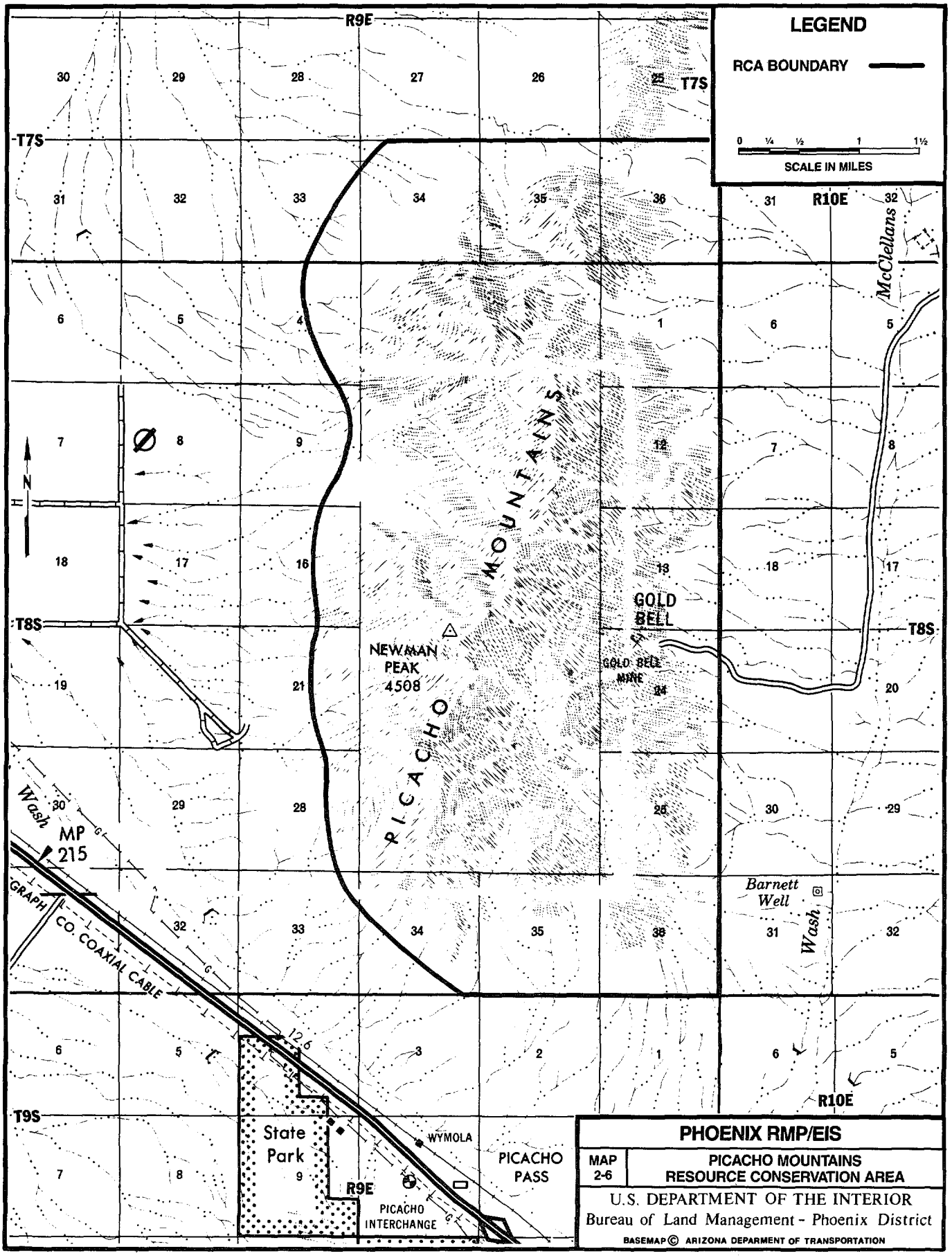
LEGEND
RCA BOUNDARY
0 ¼ ½ 1 1½
SCALE IN MILES
R9E
R10E
T7S
T8S
T9S
PICACHO MOUNTAINS
NEWMAN PEAK 4508
GOLD BELL
GOLD BELL MINE
McClellans
Wash
Barnett Well
MP 215
GRAPH CO. COAXIAL CABLE
State Park
WYMOLA
PICACHO PASS
PICACHO INTERCHANGE
PHOENIX RMP/EIS
MAP 2-6
PICACHO MOUNTAINS RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
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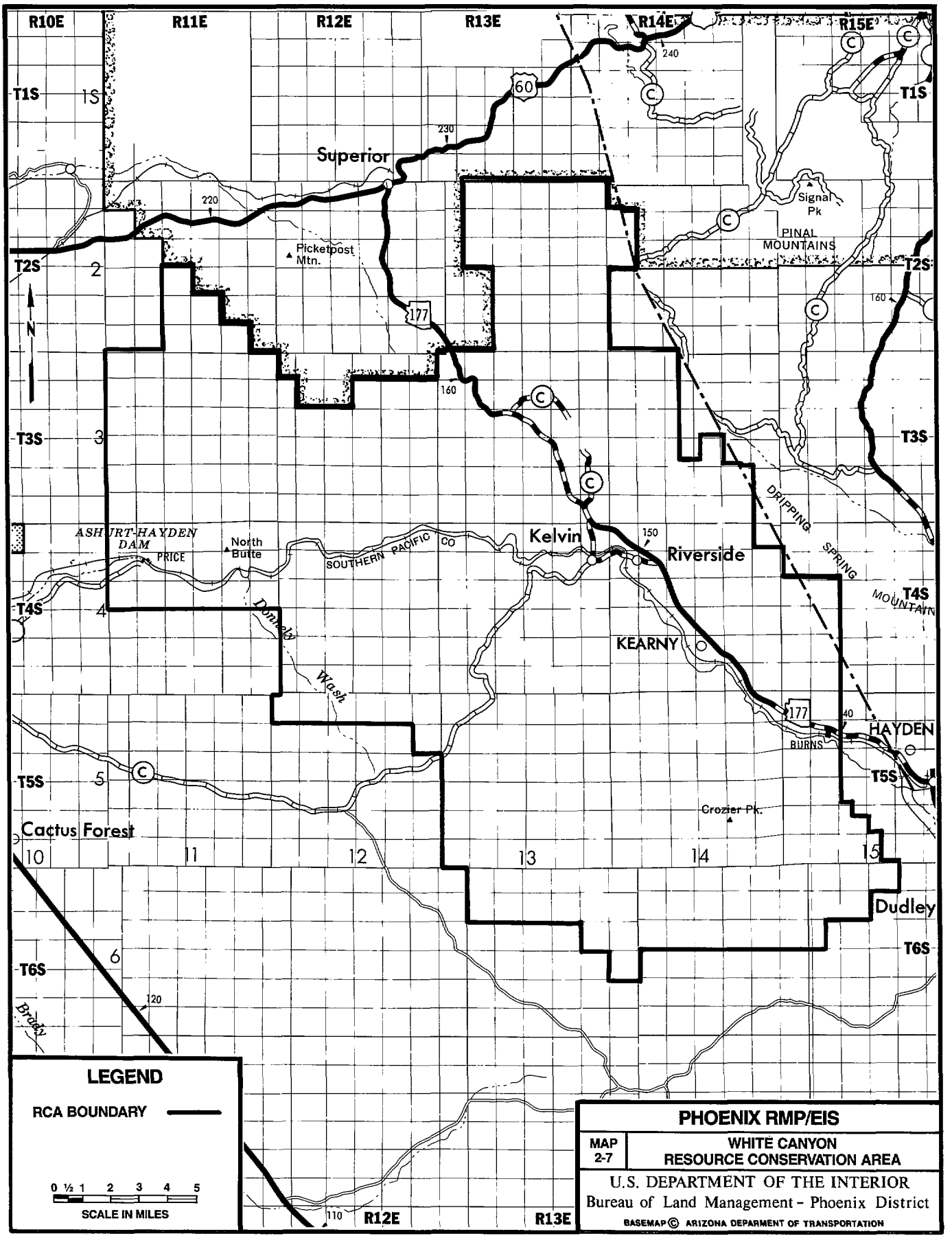
R10E
R11E
R12E
R13E
R14E
R15E
T1S
T2S
T3S
T4S
T5S
T6S
Superior
Picketpost Mtn.
Signal Pk
PINAL MOUNTAINS
ASHURT-HAYDEN DAM
PRICE
North Butte
SOUTHERN PACIFIC CO
Kelvin
Riverside
DRIPPING SPRING MOUNTAIN
KEARNY
HAYDEN
BURNS
Donnely Wash
Crozier Pk.
Cactus Forest
Dudley
Broley
LEGEND
RCA BOUNDARY
0 ½ 1 2 3 4 5
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-7
WHITE CANYON RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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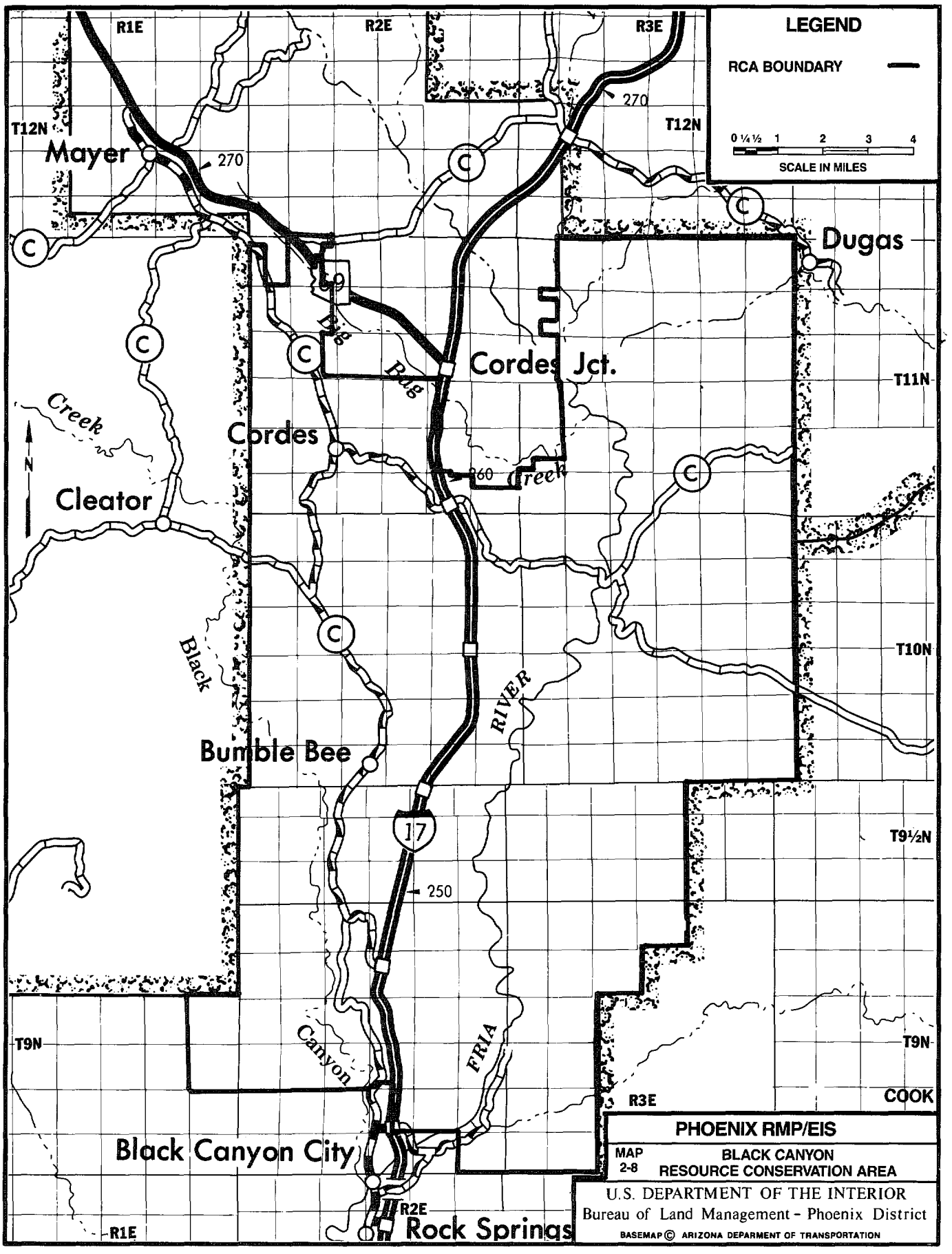
LEGEND
RCA BOUNDARY
0 ¼ ½ 1 2 3 4
SCALE IN MILES
R1E
R2E
R3E
T12N
T11N
T10N
T9½N
T9N
Mayer
Dugas
Cordes Jct.
Cordes
Cleator
Bumble Bee
Black Canyon City
Rock Springs
Big Bag Creek
Black Canyon Creek
FRIA RIVER
270
260
250
17
N
COOK
PHOENIX RMP/EIS
MAP 2-8
BLACK CANYON RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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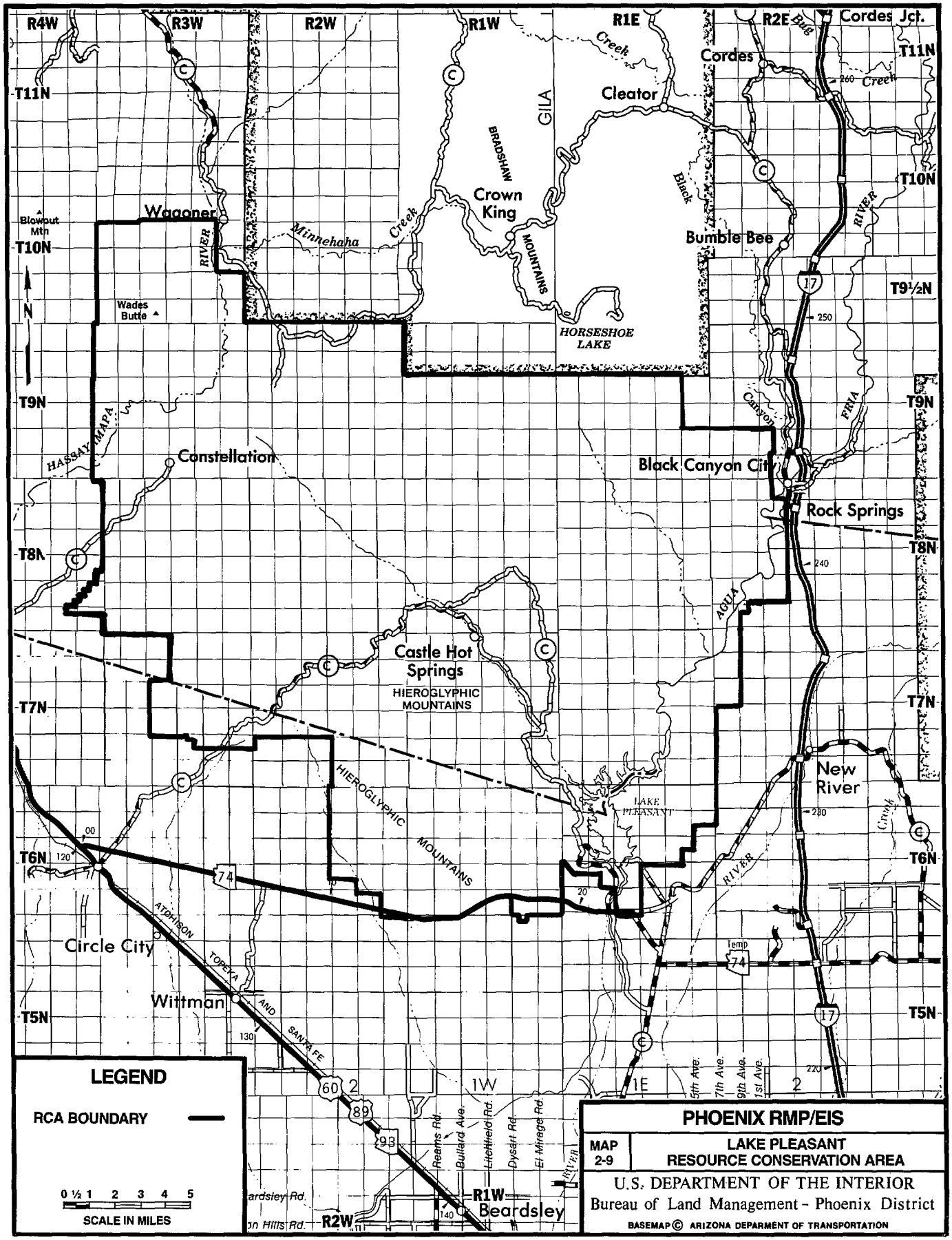
R4W
R3W
R2W
R1W
R1E
R2E
Cordes Jct.
T11N
T10N
T9½N
T9N
T8N
T7N
T6N
T5N
Cordes
Cleator
GILA
BRADSHAW
MOUNTAINS
Crown King
Black
Bumble Bee
Wagoner
Blowout Mtn
Minnehaha
Creek
RIVER
Wades Butte
HORSESHOE LAKE
HASSAYAMPA
Constellation
Black Canyon City
Rock Springs
FRIA
Canyon
AGUA
Castle Hot Springs
HIEROGLYPHIC MOUNTAINS
New River
LAKE PLEASANT
Circle City
Wittman
ATCHISON TOPEKA AND SANTA FE
Temp
Beardsley
Reams Rd.
Bullard Ave.
Litchfield Rd.
Dysart Rd.
El Mirage Rd.
5th Ave.
7th Ave.
9th Ave.
1st Ave.
LEGEND
RCA BOUNDARY
0 ½ 1 2 3 4 5
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-9
LAKE PLEASANT RESOURCE CONSERVATION AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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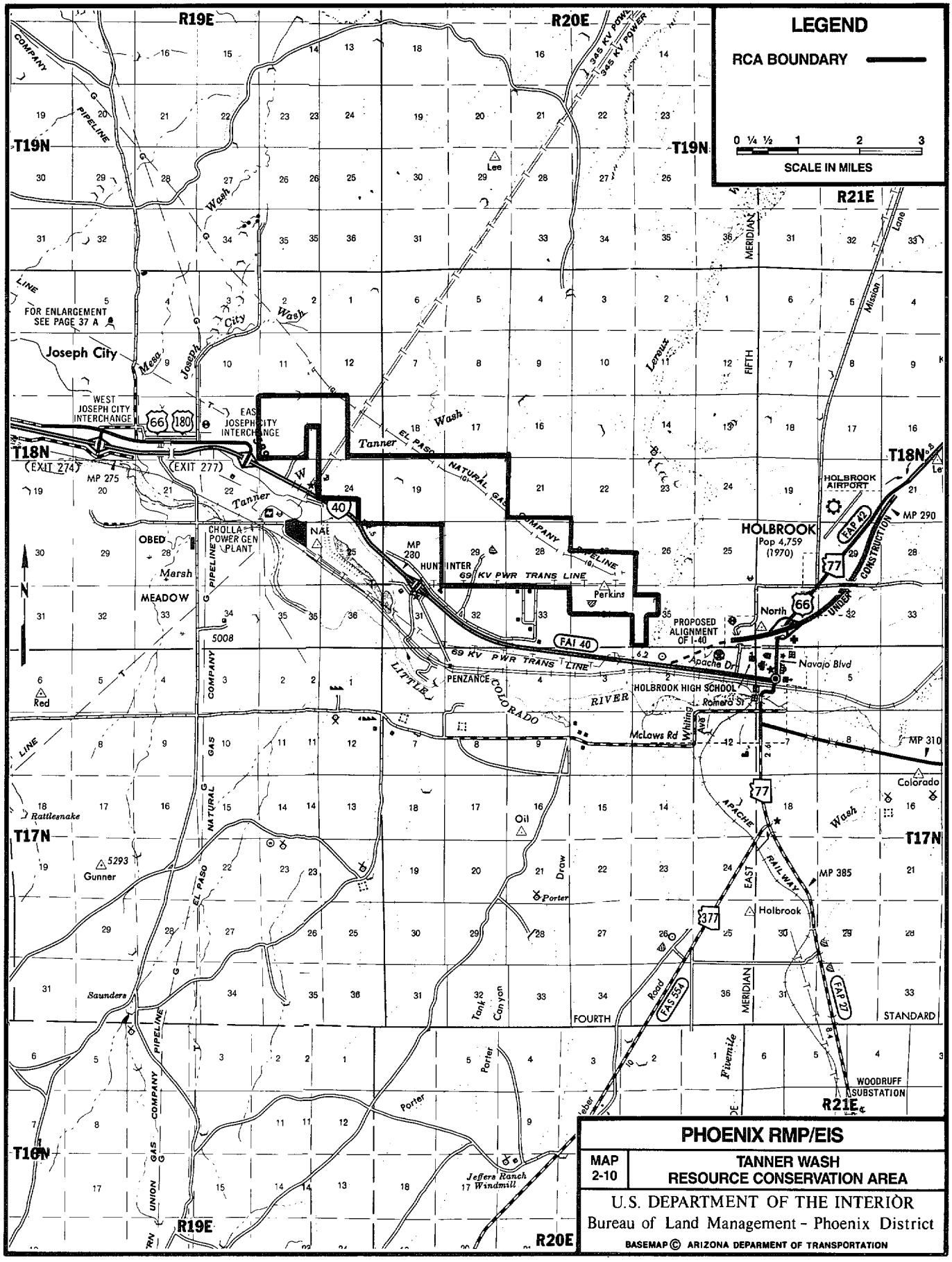
LEGEND
RCA BOUNDARY
0 ¼ ½ 1 2 3
SCALE IN MILES
R19E
R20E
R21E
T19N
T18N
T17N
T16N
FOR ENLARGEMENT SEE PAGE 37 A
Joseph City
WEST JOSEPH CITY INTERCHANGE
EAST JOSEPH CITY INTERCHANGE
(EXIT 274)
(EXIT 277)
MP 275
MP 280
MP 290
MP 310
MP 385
HOLBROOK
Pop 4,759 (1970)
HOLBROOK AIRPORT
CHOLLA POWER GEN PLANT
OBED
MEADOW
HUNT INTER
69 KV PWR TRANS LINE
PROPOSED ALIGNMENT OF I-40
PENZANCE
HOLBROOK HIGH SCHOOL
Apache Dr
Navajo Blvd
Romero St
McLaws Rd
Whiting Ave
LITTLE COLORADO RIVER
Tanner Wash
Mesa Wash
Joseph City Wash
Lee
Perkins
North
Red
Rattlesnake
Gunner
Oil
Porter
Colorado
Holbrook
Saunders
Jeffers Ranch Windmill
WOODRUFF SUBSTATION
FOURTH
STANDARD
FIFTH
MERIDIAN
EAST
APACHE RAILWAY
Fivemile
Road
Tank Canyon
Draw
Lereux
Mission Lane
EL PASO NATURAL GAS COMPANY PIPELINE
UNION GAS COMPANY PIPELINE
345 KV POWER
FAI 40
FAP 42
FAS 554
FAP 27
66
180
40
77
377
PHOENIX RMP/EIS
MAP 2-10
TANNER WASH RESOURCE CONSERVATION AREA
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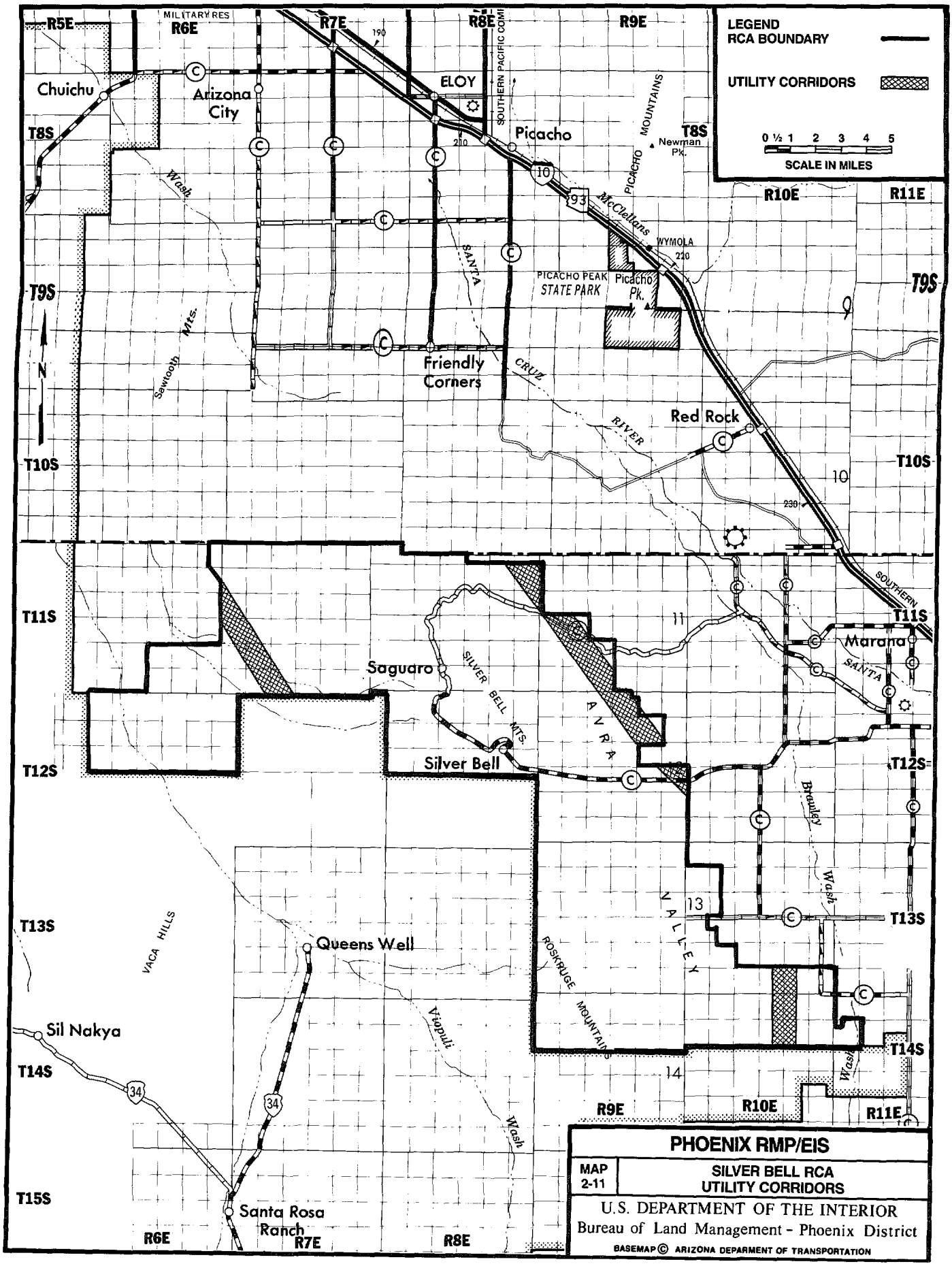
UTILITY CORRIDORS

MAP NUMBER	NAME
2–11	SILVER BELL
2–12	WHITE CANYON
2–13	BLACK CANYON


LEGEND
RCA BOUNDARY
UTILITY CORRIDORS
0 ½ 1 2 3 4 5
SCALE IN MILES
R5E
R6E
R7E
R8E
R9E
R10E
R11E
T8S
T9S
T10S
T11S
T12S
T13S
T14S
T15S
MILITARY RES
Chuichu
Arizona City
ELOY
SOUTHERN PACIFIC COMI
Picacho
PICACHO MOUNTAINS
Newman Pk.
McClellans
WYMOLA
PICACHO PEAK STATE PARK
Picacho Pk.
SANTA CRUZ RIVER
Sawtooth Mts.
Friendly Corners
Red Rock
SOUTHERN
Marana
Saguaro
SILVER BELL MTS.
Silver Bell
AVRA VALLEY
Brawley Wash
VACA HILLS
Queens Well
ROSKRUGE MOUNTAIN
Vopuli Wash
Sil Nakya
Santa Rosa Ranch
N
PHOENIX RMP/EIS
MAP 2-11
SILVER BELL RCA UTILITY CORRIDORS
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Bureau of Land Management - Phoenix District
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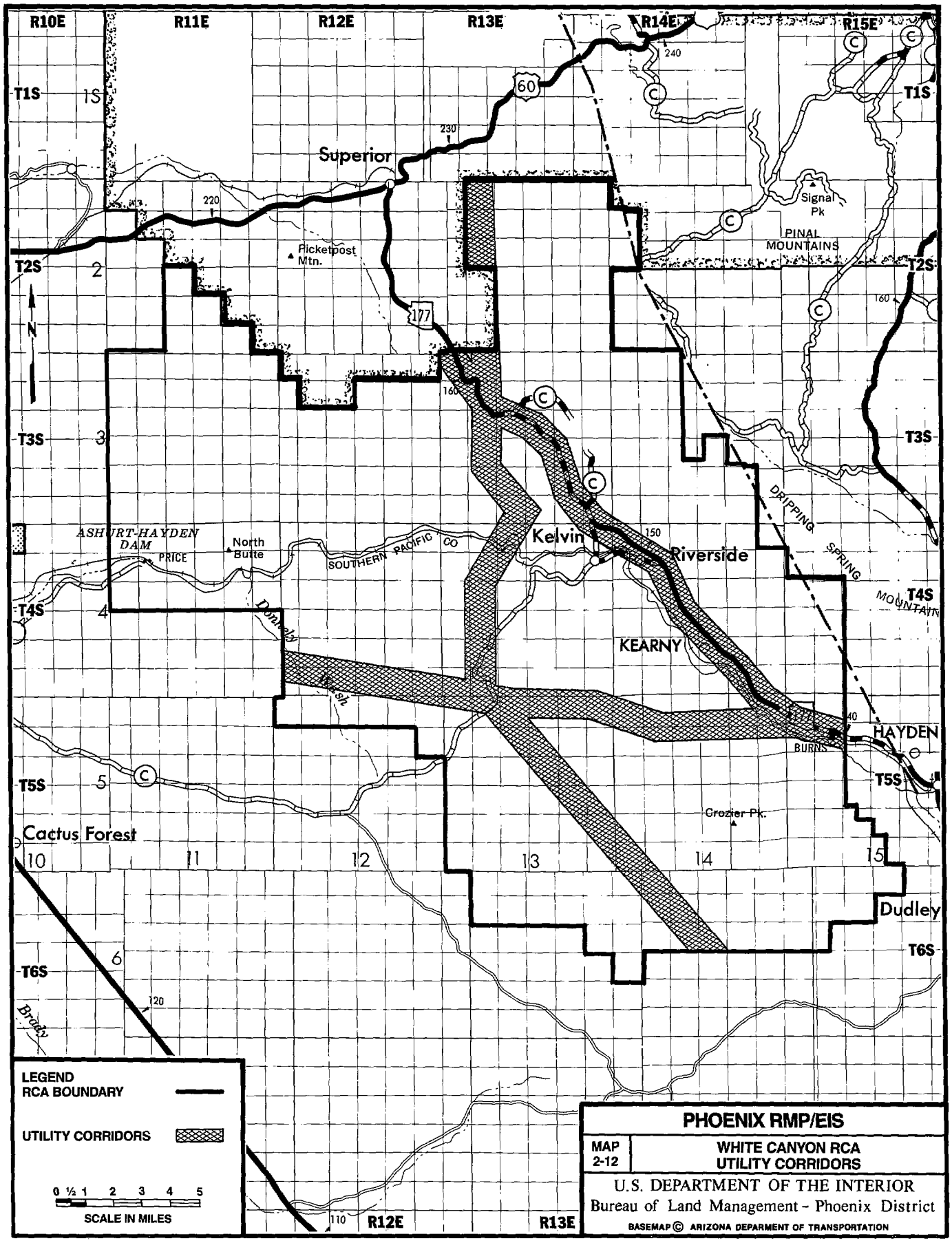
R10E
R11E
R12E
R13E
R14E
R15E
T1S
T2S
T3S
T4S
T5S
T6S
Superior
Picketpost Mtn.
Signal Pk
PINAL MOUNTAINS
ASHURT-HAYDEN DAM
PRICE
North Butte
SOUTHERN PACIFIC CO
Kelvin
Riverside
DRIPPING SPRING MOUNTAIN
KEARNY
HAYDEN
BURNS
Grozier Pk.
Cactus Forest
Dudley
Donnely Wash
Brady
LEGEND
RCA BOUNDARY
UTILITY CORRIDORS
0 ½ 1 2 3 4 5
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-12
WHITE CANYON RCA UTILITY CORRIDORS
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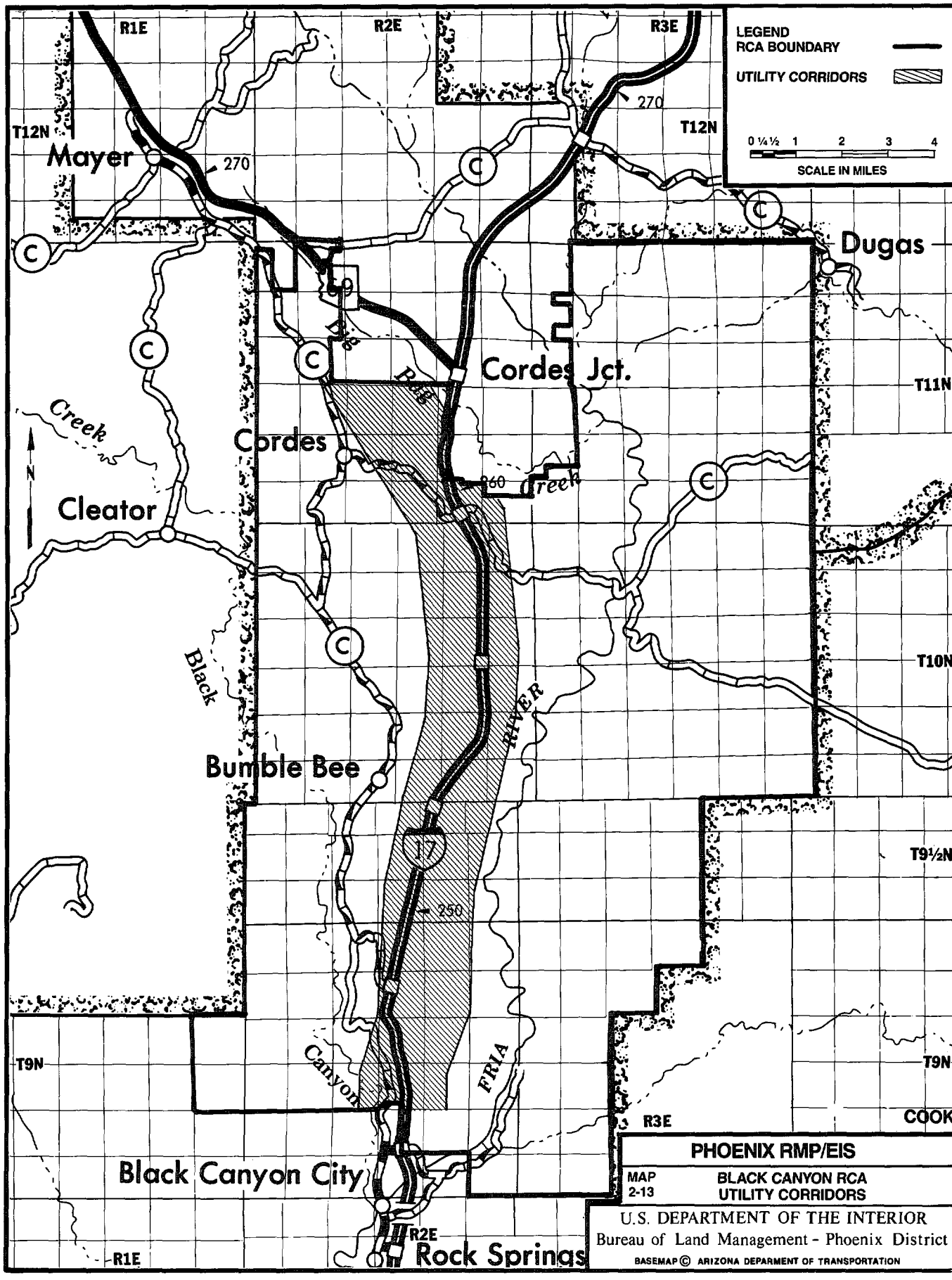
LEGEND
RCA BOUNDARY
UTILITY CORRIDORS
0 ¼ ½ 1 2 3 4
SCALE IN MILES
R1E
R2E
R3E
T12N
T11N
T10N
T9½N
T9N
Mayer
Dugas
Cordes Jct.
Cordes
Cleator
Bumble Bee
Black Canyon City
Rock Springs
Big Bug Creek
Black Canyon Creek
FRIA RIVER
270
260
250
17
COOK
PHOENIX RMP/EIS
MAP 2-13
BLACK CANYON RCA UTILITY CORRIDORS
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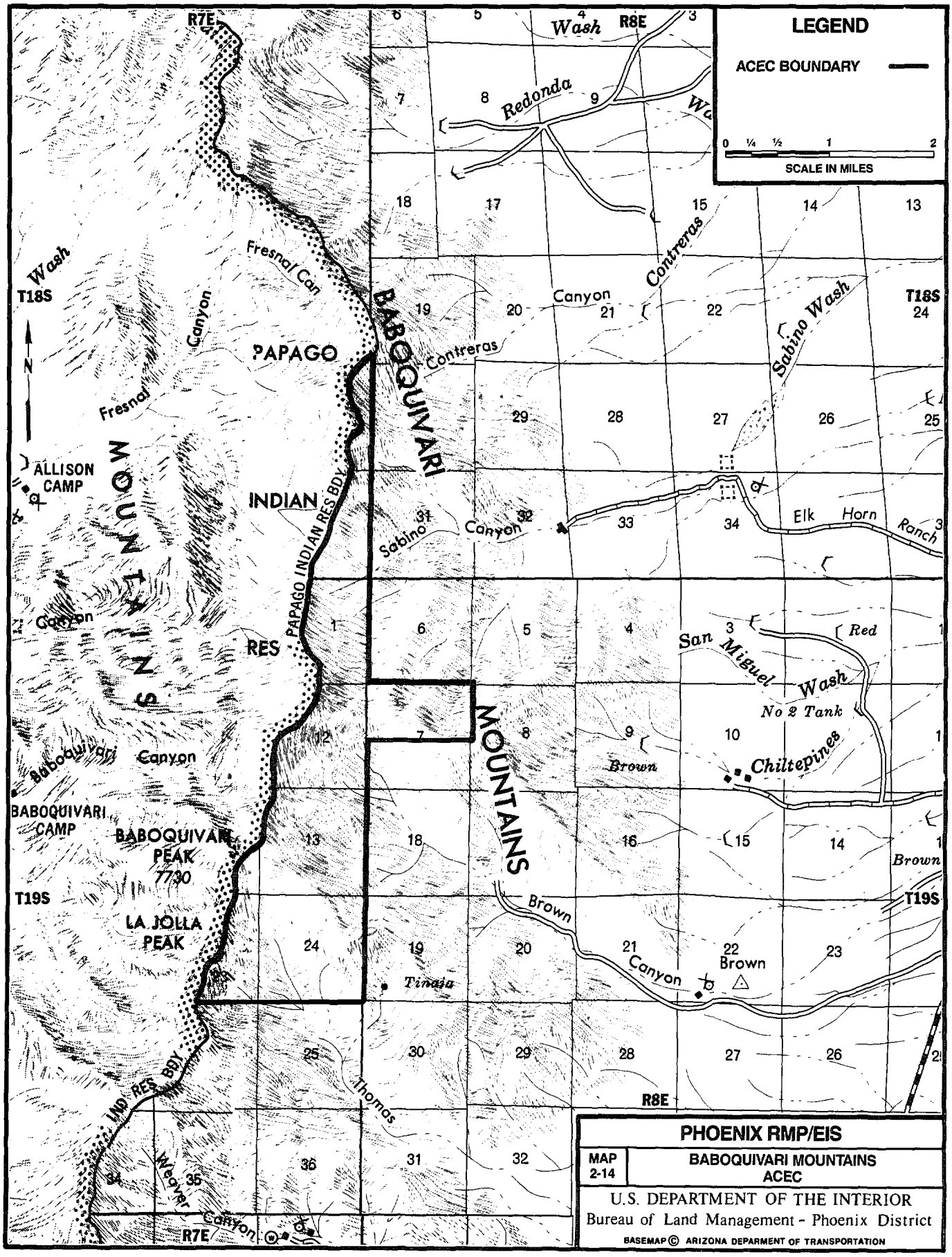
AREAS OF CRITICAL ENVIRONMENTAL CONCERN

MAP NUMBER	NAME
2–14	BABOQUIVARI MOUNTAINS
2–15	WATERMAN MOUNTAINS
2–16	WHITE CANYON
2–17	PERRY MESA and LARRY CANYON
2–18	TANNER WASH
2–19	APPLETON-WHITTELL


LEGEND
ACEC BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
R7E
R8E
T18S
T19S
Wash
Redonda
Contreras
Canyon
Fresnal Can
Fresnal
PAPAGO
INDIAN
RES
PAPAGO INDIAN RES BDY
BABOQUIVARI
MOUNTAINS
ALLISON CAMP
Sabino Wash
Sabino
Elk Horn Ranch
San Miguel Wash
Red
No 2 Tank
Chiltepines
Brown
Babaquivari Canyon
BABOQUIVARI CAMP
BABOQUIVARI PEAK 7730
LA JOLLA PEAK
Tinaja
IND RES BDY
Thomas
Weaver Canyon
PHOENIX RMP/EIS
MAP 2-14
BABOQUIVARI MOUNTAINS ACEC
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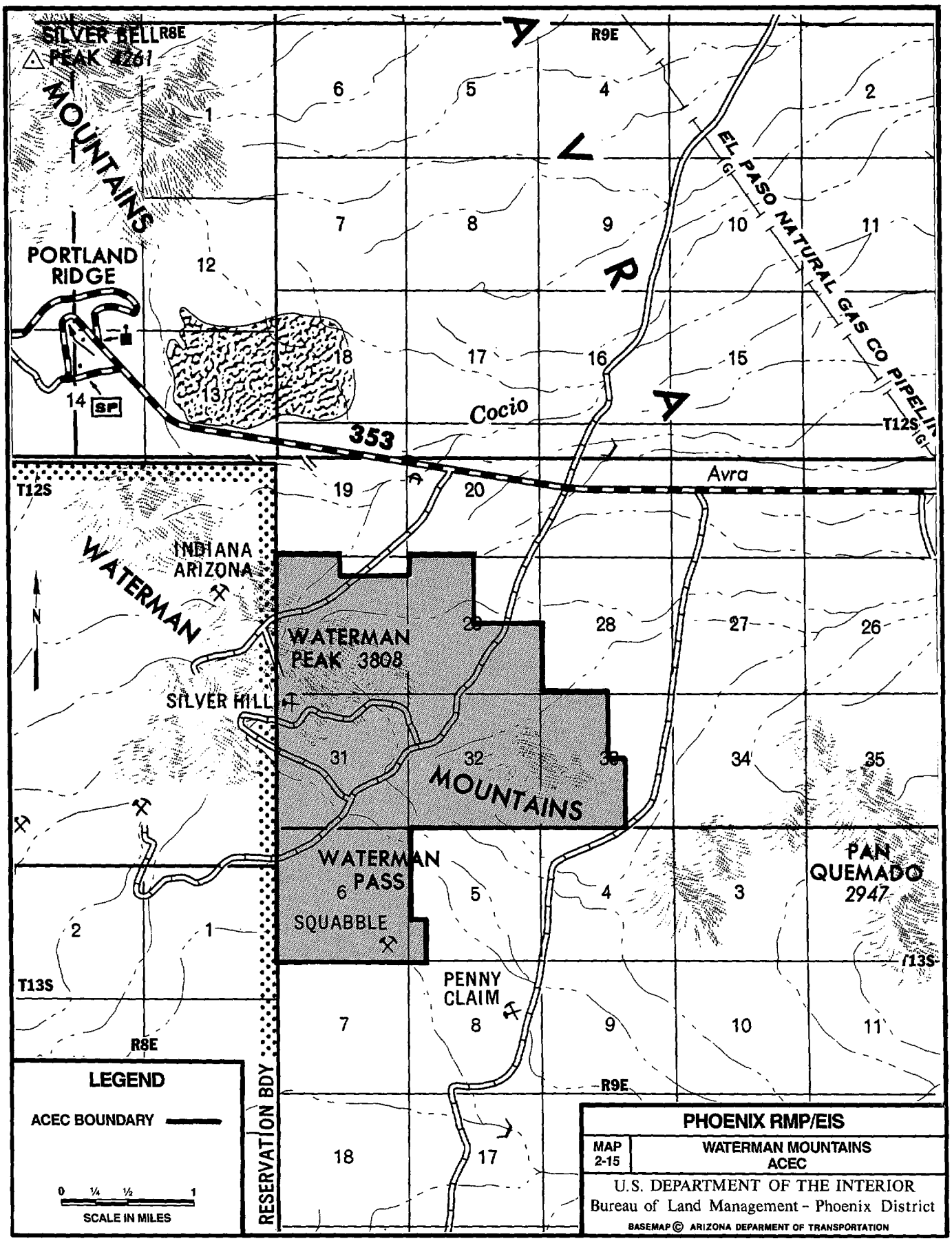
SILVER BELL PEAK 4261
R8E
R9E
MOUNTAINS
PORTLAND RIDGE
SP
353
Cocio
Avra
T12S
EL PASO NATURAL GAS CO PIPELIN
INDIANA ARIZONA
WATERMAN
WATERMAN PEAK 3808
SILVER HILL
MOUNTAINS
WATERMAN PASS
SQUABBLE
PAN QUEMADO 2947
T13S
PENNY CLAIM
RESERVATION BDY
LEGEND
ACEC BOUNDARY
0 ¼ ½ 1
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-15
WATERMAN MOUNTAINS ACEC
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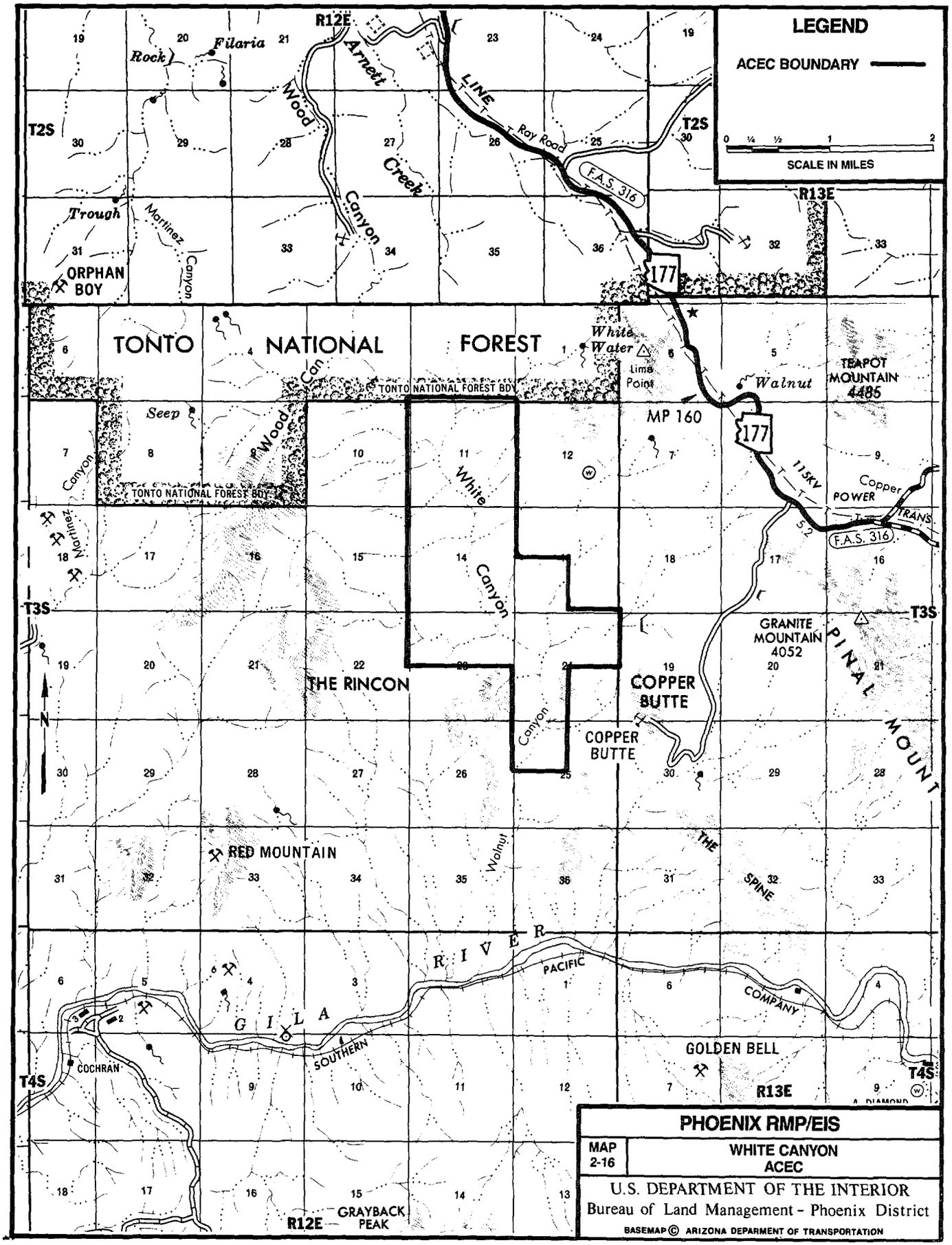
LEGEND
ACEC BOUNDARY
SCALE IN MILES
TONTO NATIONAL FOREST
TONTO NATIONAL FOREST BDY
ORPHAN BOY
Filaria
Rock
Trough
Martinez Canyon
Wood Canyon
Arnett Creek
LINE
Ray Road
F.A.S. 316
177
White Water
Lime Point
Walnut
TEAPOT MOUNTAIN 4485
MP 160
115KV
Copper POWER TRANS
Seep
White Canyon
THE RINCON
COPPER BUTTE
GRANITE MOUNTAIN 4052
PINAL MOUNT
RED MOUNTAIN
THE SPINE
GILA RIVER
PACIFIC COMPANY
SOUTHERN
GOLDEN BELL
COCHRAN
GRAYBACK PEAK
R12E
R13E
T2S
T3S
T4S
PHOENIX RMP/EIS
MAP 2-16
WHITE CANYON ACEC
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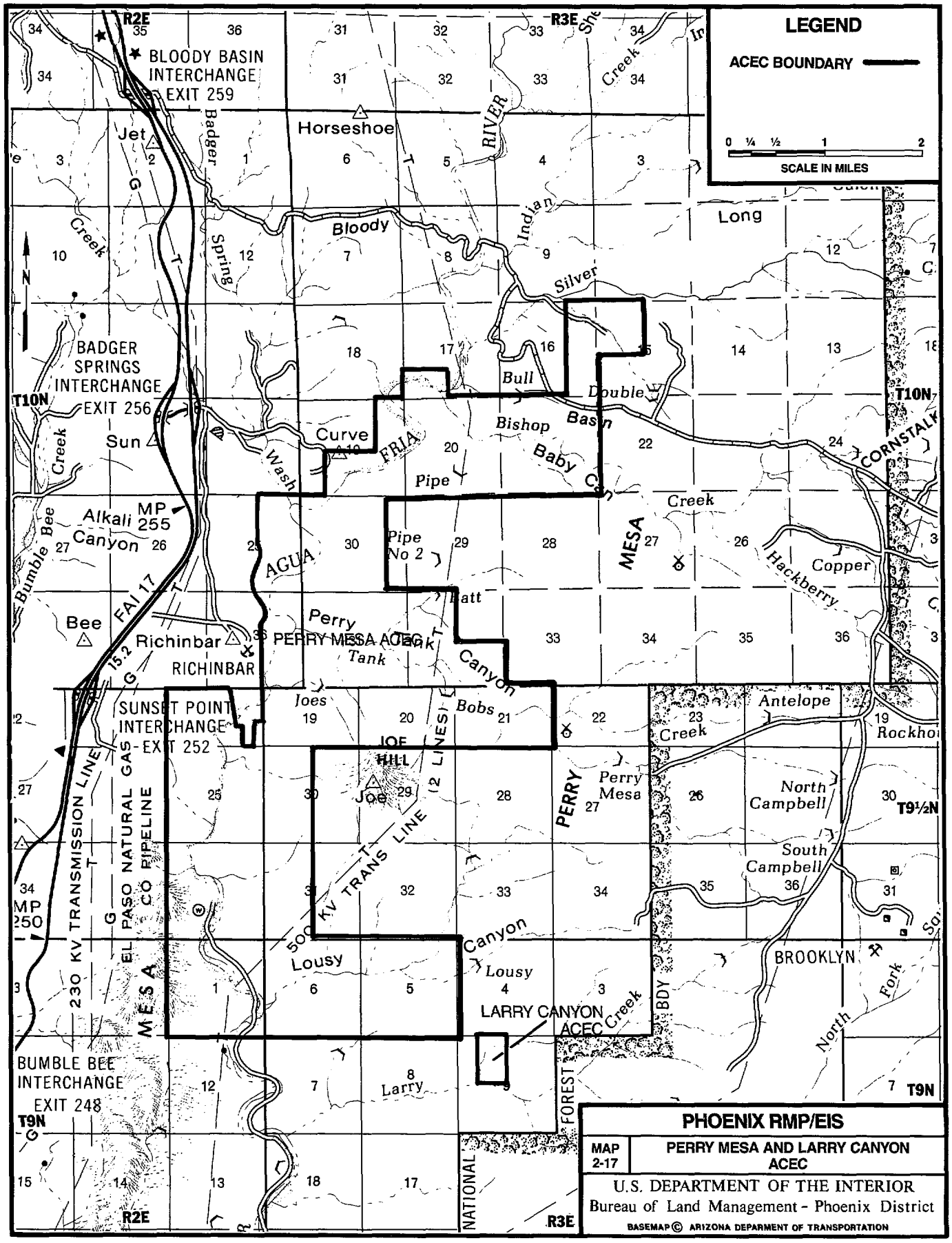
LEGEND
ACEC BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
BLOODY BASIN INTERCHANGE EXIT 259
BADGER SPRINGS INTERCHANGE EXIT 256
SUNSET POINT INTERCHANGE EXIT 252
BUMBLE BEE INTERCHANGE EXIT 248
PERRY MESA ACEC
LARRY CANYON ACEC
Horseshoe
Jet
Sun
Bee
Richinbar
Alkali Canyon
MP 255
MP 250
Curve
Pipe
Pipe No 2
Perry Tank
Joes
Bobs
Joe
Lousy
Larry
Bull
Bishop
Double
Basin
Baby Can
Copper
Hackberry
Antelope
Perry Mesa
North Campbell
South Campbell
BROOKLYN
North Fork
Long
Silver
Indian
Bloody
Badger
Spring
Creek
Bumble Bee
Wash
FRIA
AGUA
PERRY
MESA
CORNSTALK
RIVER
FAI 17
230 KV TRANSMISSION LINE
EL PASO NATURAL GAS CO PIPELINE
500 KV TRANS LINE (2 LINES)
NATIONAL FOREST BDY
R2E
R3E
T10N
T9½N
T9N
PHOENIX RMP/EIS
MAP 2-17
PERRY MESA AND LARRY CANYON ACEC
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Bureau of Land Management - Phoenix District
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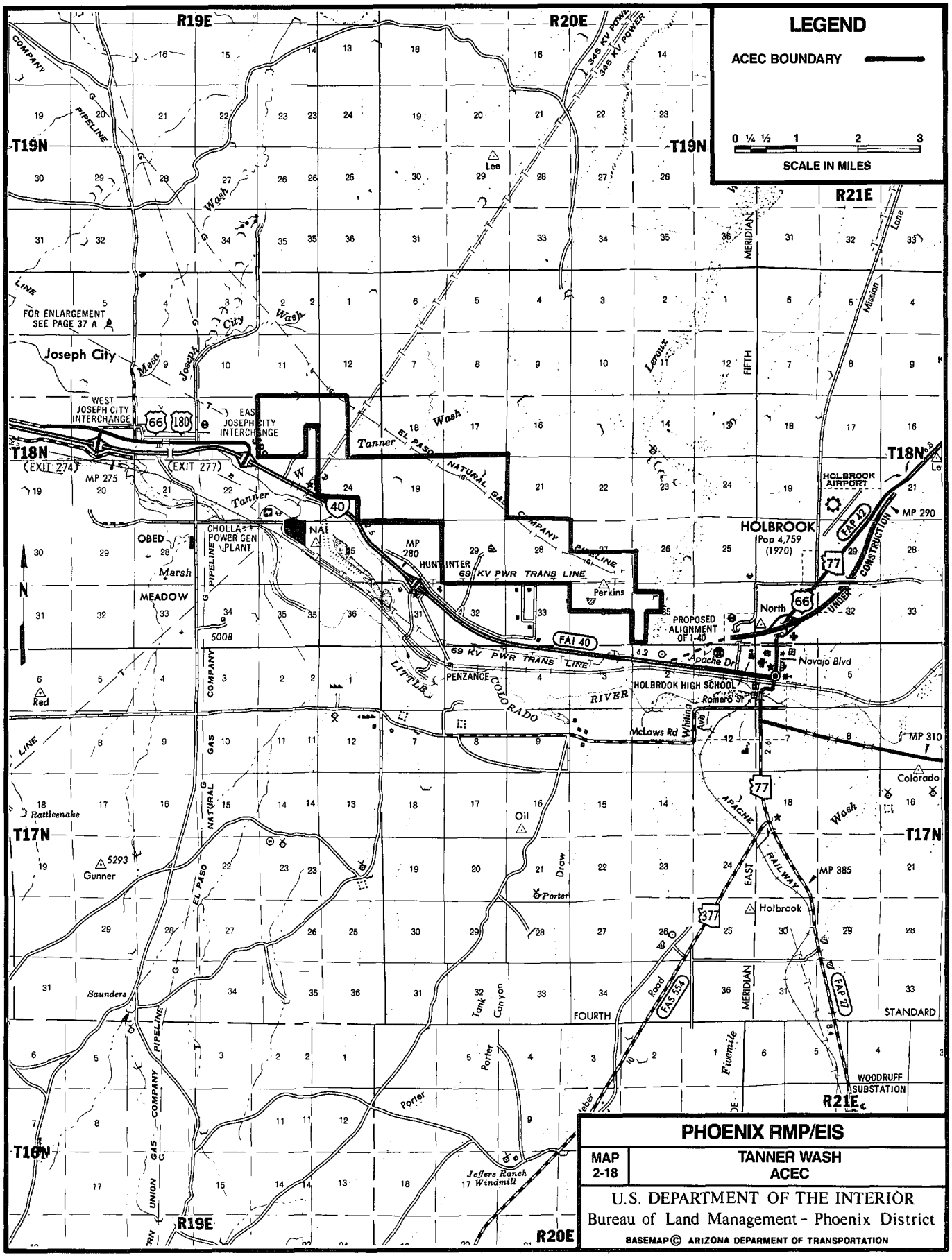

PHOENIX RMP/EIS

MAP 2-18 | TANNER WASH ACEC

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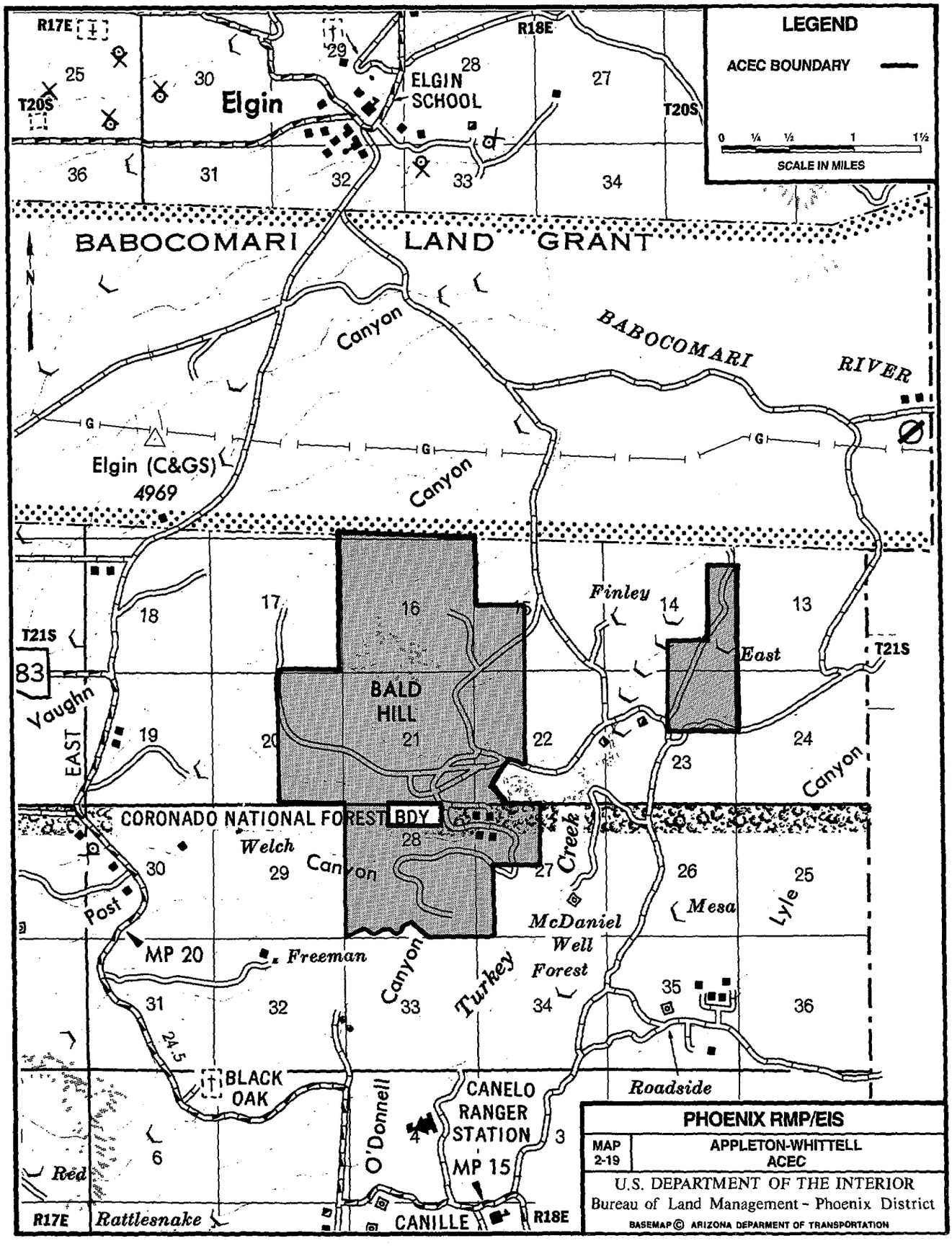
LEGEND
ACEC BOUNDARY
0 ¼ ½ 1 1½
SCALE IN MILES
R17E
R18E
T20S
T21S
Elgin
ELGIN SCHOOL
BABOCOMARI LAND GRANT
BABOCOMARI RIVER
Canyon
Elgin (C&GS)
4969
BALD HILL
Finley
East
Vaughn
EAST
83
CORONADO NATIONAL FOREST BDY
Welch
Canyon
Creek
Post
MP 20
Freeman
McDaniel
Well
Forest
Turkey
Canyon
Mesa
Lyle
Roadside
BLACK OAK
O'Donnell
CANELO RANGER STATION
MP 15
Red
Rattlesnake
CANILLE
PHOENIX RMP/EIS
MAP 2-19
APPLETON-WHITTELL ACEC
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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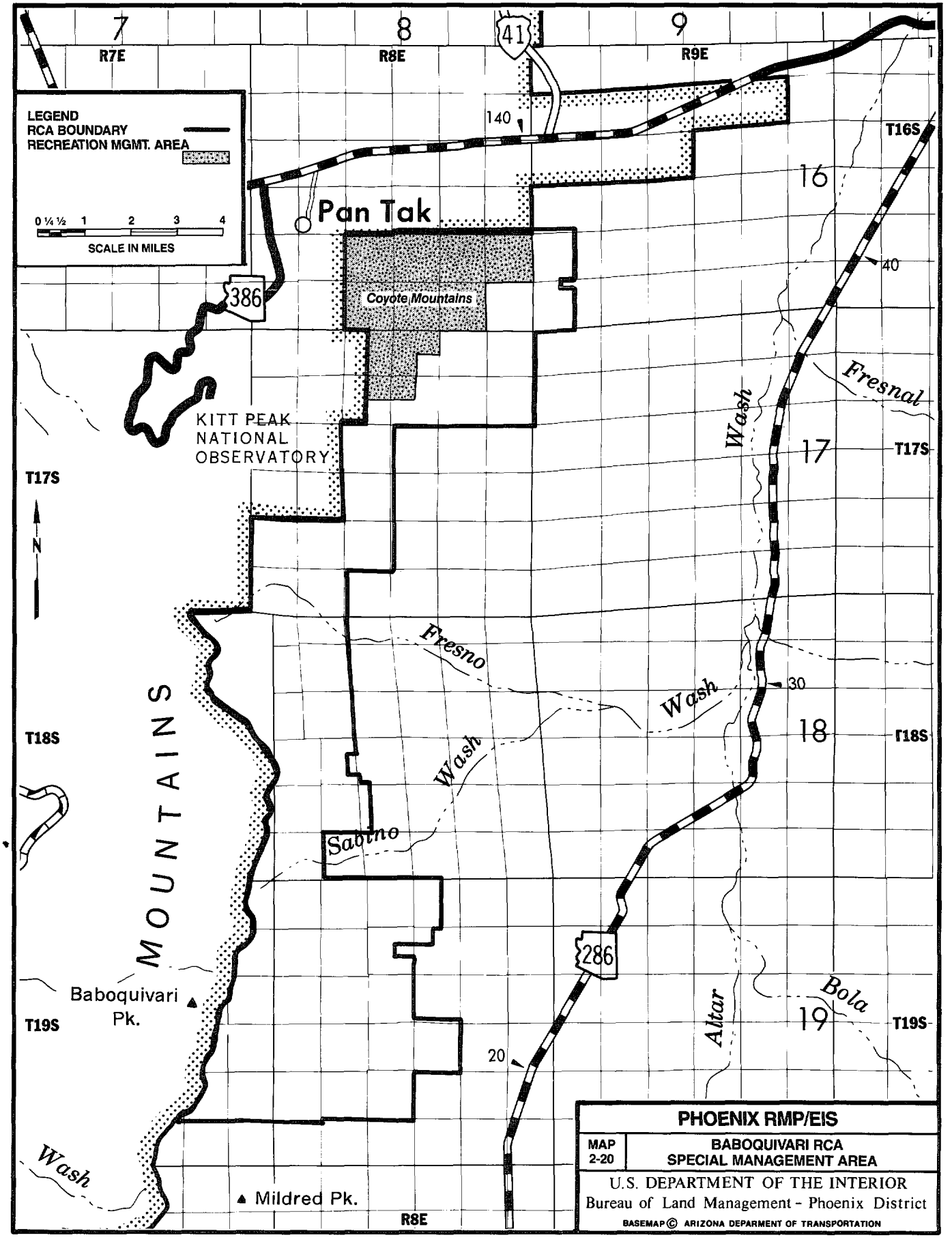
SPECIAL MANAGEMENT AREAS BY RCA

MAP NUMBER	NAME
2–20	BABOQUIVARI
2–21	SILVER BELL
2–22	PICACHO MOUNTAINS
2–23	WHITE CANYON
2–24	BLACK CANYON
2–25	LAKE PLEASANT


LEGEND
RCA BOUNDARY
RECREATION MGMT. AREA
0 ¼ ½ 1 2 3 4
SCALE IN MILES
7
8
9
R7E
R8E
R9E
41
140
T16S
16
Pan Tak
40
386
Coyote Mountains
Fresnal
Wash
KITT PEAK
NATIONAL
OBSERVATORY
17
T17S
T17S
N
Fresno
Wash
30
18
T18S
T18S
Wash
Sabino
MOUNTAINS
286
Baboquivari
Pk.
Bola
Altar
19
T19S
T19S
20
Wash
Mildred Pk.
R8E
PHOENIX RMP/EIS
MAP 2-20
BABOQUIVARI RCA
SPECIAL MANAGEMENT AREA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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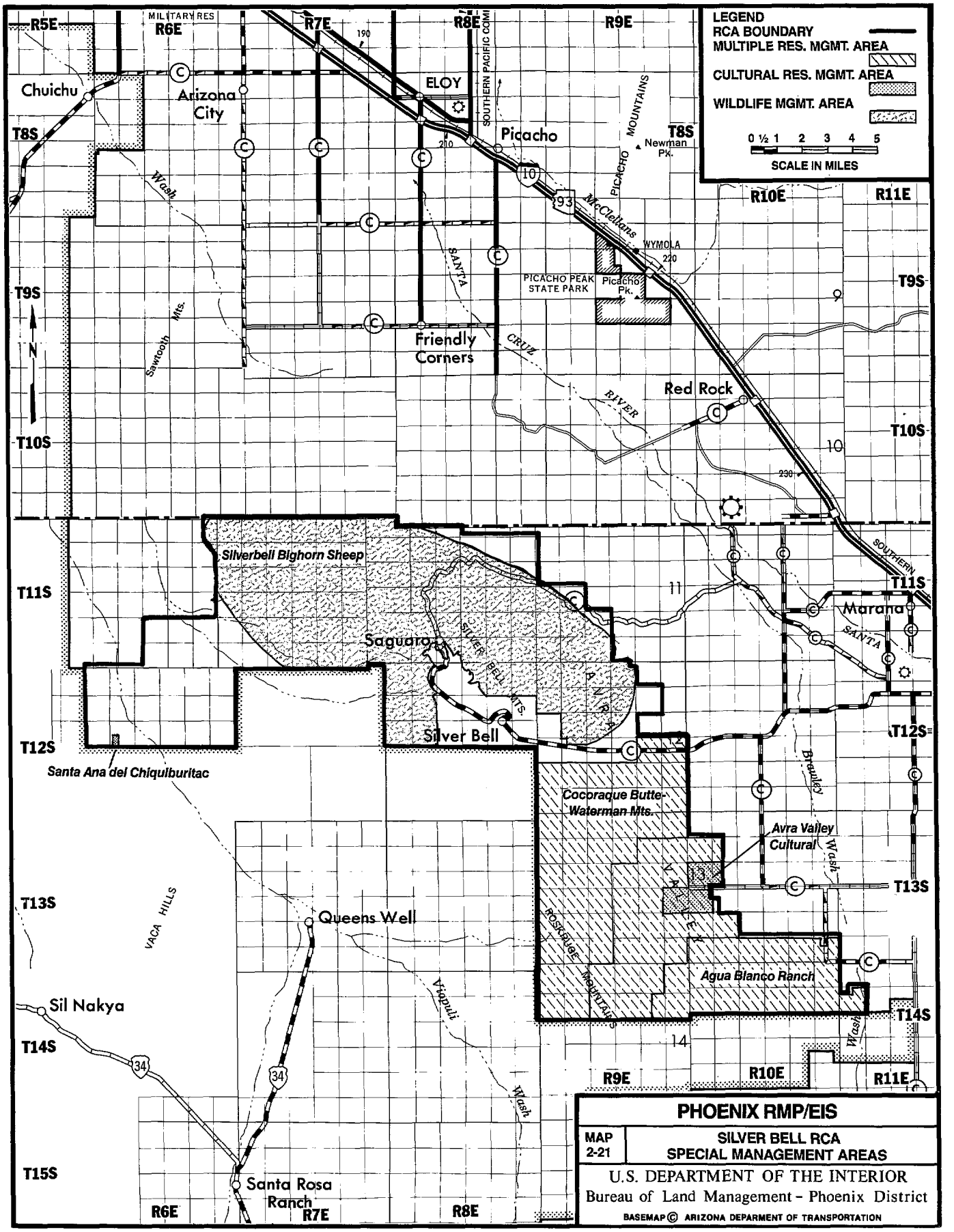
LEGEND
RCA BOUNDARY
MULTIPLE RES. MGMT. AREA
CULTURAL RES. MGMT. AREA
WILDLIFE MGMT. AREA
0 ½ 1 2 3 4 5
SCALE IN MILES
MILITARY RES
R5E
R6E
R7E
R8E
R9E
R10E
R11E
T8S
T9S
T10S
T11S
T12S
T13S
T14S
T15S
N
Chuichu
Arizona City
ELOY
SOUTHERN PACIFIC COMI
Picacho
PICACHO MOUNTAINS
Newman Pk.
McClellans
WYMOLA
PICACHO PEAK STATE PARK
Picacho Pk.
SANTA
CRUZ
RIVER
Friendly Corners
Red Rock
Sawtooth Mts.
Wash
Silverbell Bighorn Sheep
Saguaro
SILVER BELL MTS.
Silver Bell
Santa Ana del Chiquiburitac
Marana
SOUTHERN
Brawley
Cocoraque Butte-Waterman Mts.
Avra Valley Cultural
Agua Blanco Ranch
ROSKRUGE MOUNTAINS
Queens Well
VACA HILLS
Vapuli
Sil Nakya
Santa Rosa Ranch
PHOENIX RMP/EIS
MAP 2-21
SILVER BELL RCA SPECIAL MANAGEMENT AREAS
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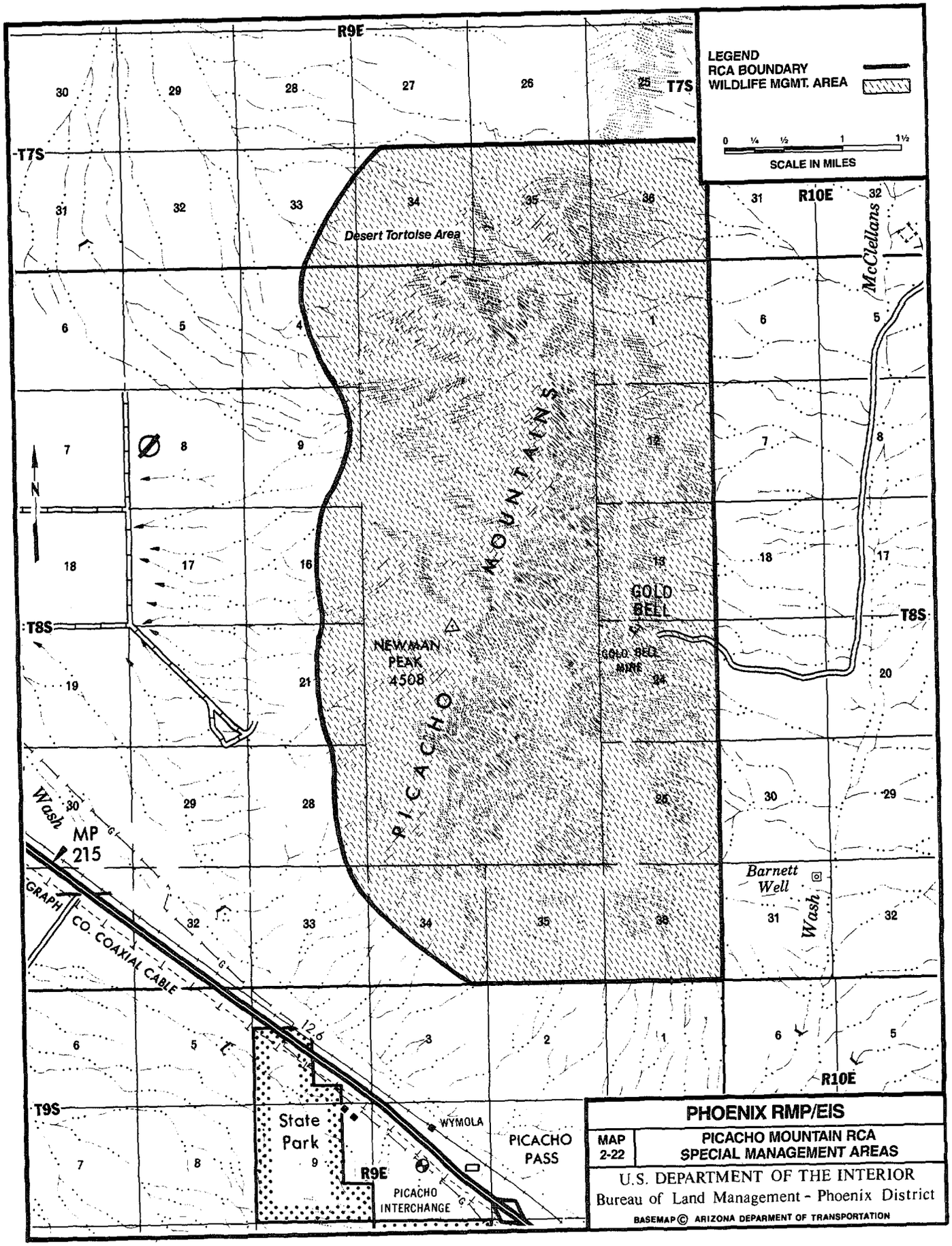
LEGEND
RCA BOUNDARY
WILDLIFE MGMT. AREA
0 ¼ ½ 1 1½
SCALE IN MILES
R9E
R10E
T7S
T8S
T9S
Desert Tortoise Area
PICACHO MOUNTAINS
NEWMAN PEAK 4508
GOLD BELL
GOLD BELL MINE
McClellans Wash
Barnett Well
Wash
MP 215
GRAPH CO. COAXIAL CABLE
State Park
WYMOLA
PICACHO PASS
PICACHO INTERCHANGE
N
PHOENIX RMP/EIS
MAP 2-22
PICACHO MOUNTAIN RCA SPECIAL MANAGEMENT AREAS
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Bureau of Land Management - Phoenix District
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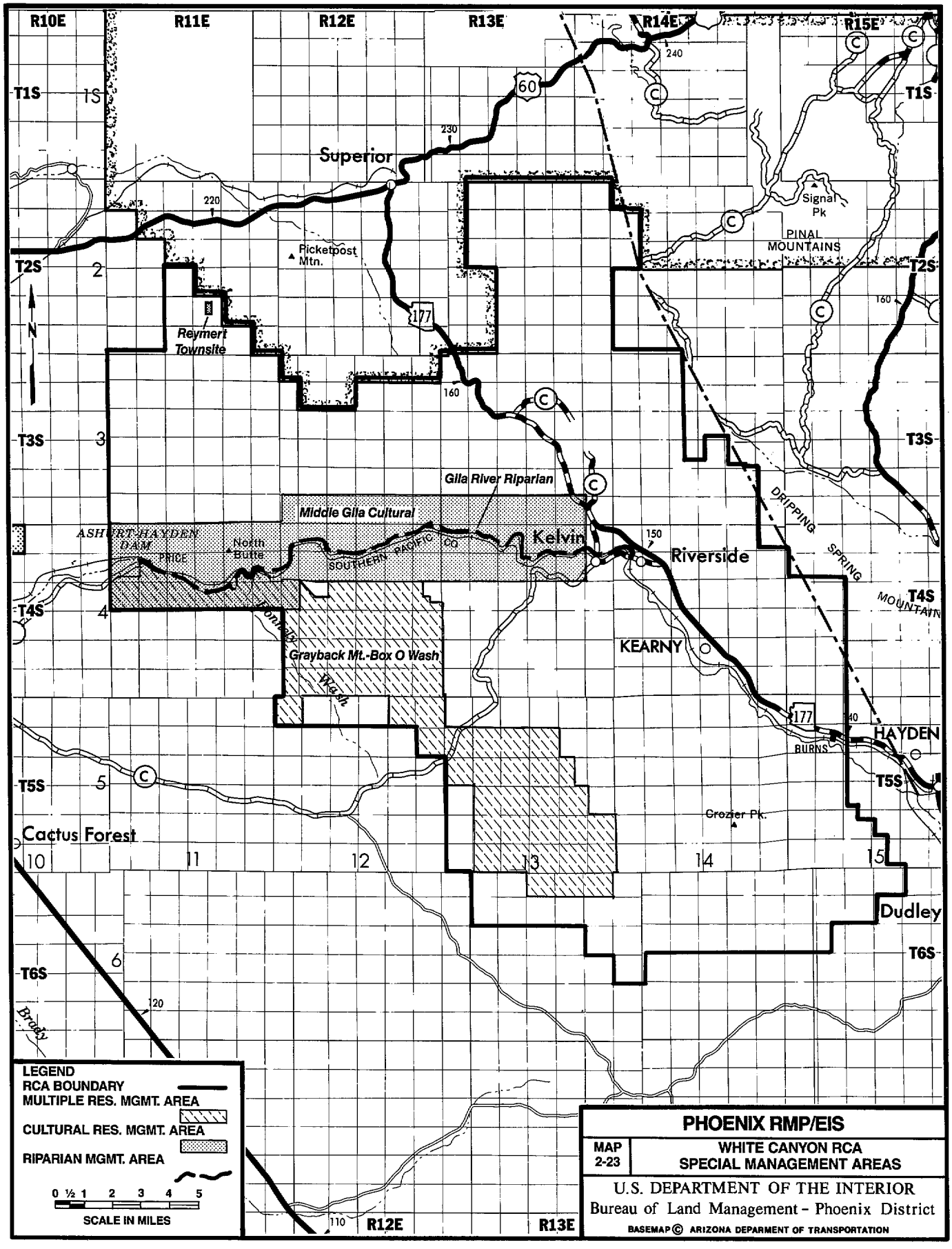
R10E
R11E
R12E
R13E
R14E
R15E
T1S
T2S
T3S
T4S
T5S
T6S
Superior
Picketpost Mtn.
Reymert Townsite
Signal Pk
PINAL MOUNTAINS
Gila River Riparian
Middle Gila Cultural
ASHURST-HAYDEN DAM
PRICE
North Butte
SOUTHERN PACIFIC CO.
Kelvin
Riverside
DRIPPING SPRING MOUNTAIN
KEARNY
Grayback Mt.-Box O Wash
HAYDEN
BURNS
Crozier Pk.
Cactus Forest
Dudley
Broad
LEGEND
RCA BOUNDARY
MULTIPLE RES. MGMT. AREA
CULTURAL RES. MGMT. AREA
RIPARIAN MGMT. AREA
0 ½ 1 2 3 4 5
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-23
WHITE CANYON RCA
SPECIAL MANAGEMENT AREAS
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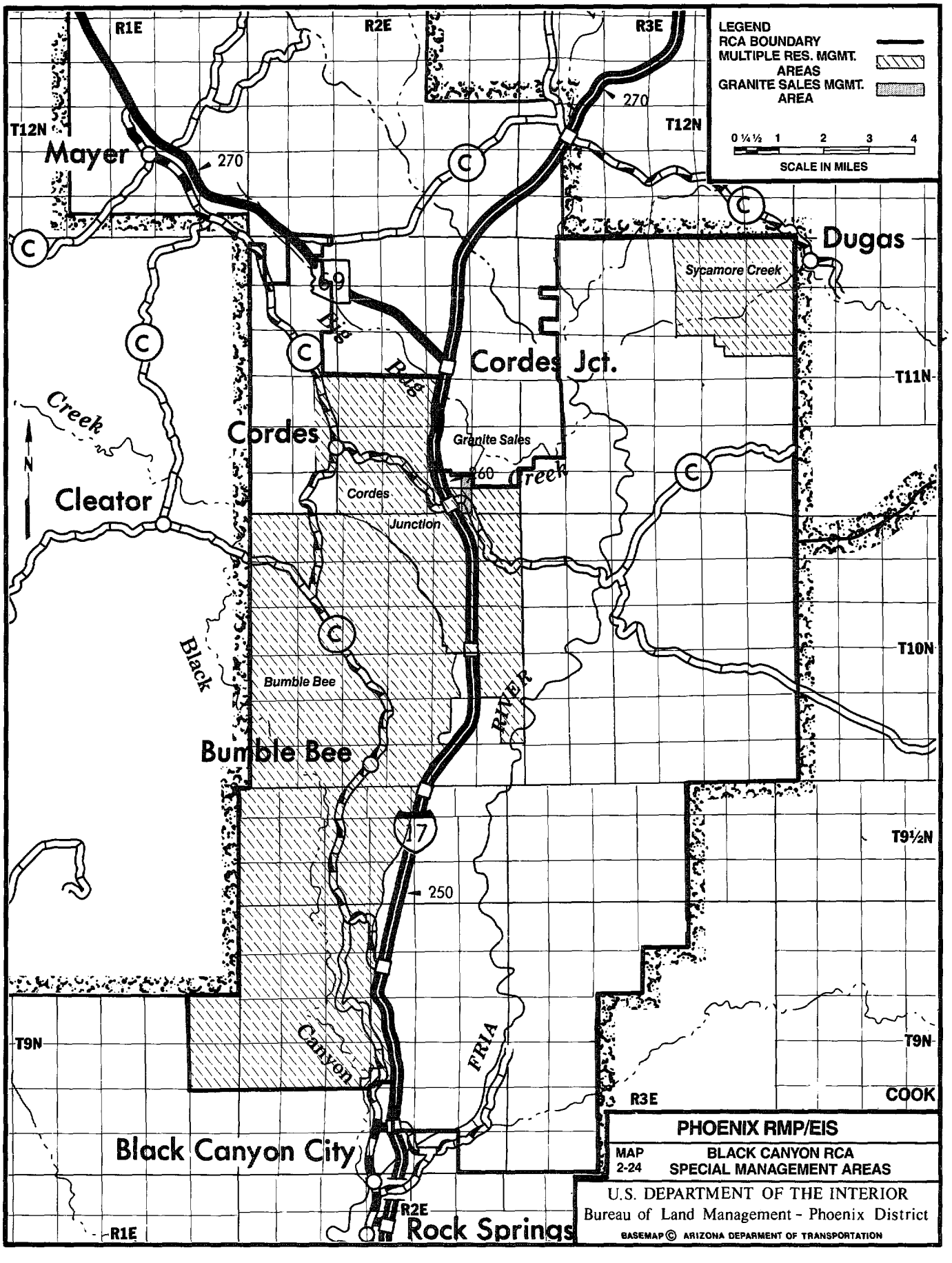
LEGEND
RCA BOUNDARY
MULTIPLE RES. MGMT. AREAS
GRANITE SALES MGMT. AREA
0 ¼ ½ 1 2 3 4
SCALE IN MILES
R1E
R2E
R3E
T12N
T11N
T10N
T9½N
T9N
Mayer
Dugas
Sycamore Creek
Cordes Jct.
Big
Creek
Cordes
Granite Sales
Creek
Cordes
Junction
Cleator
N
Black
Bumble Bee
Bumble Bee
RIVER
Canyon
FRIA
Black Canyon City
Rock Springs
COOK
PHOENIX RMP/EIS
MAP 2-24
BLACK CANYON RCA
SPECIAL MANAGEMENT AREAS
U.S. DEPARTMENT OF THE INTERIOR
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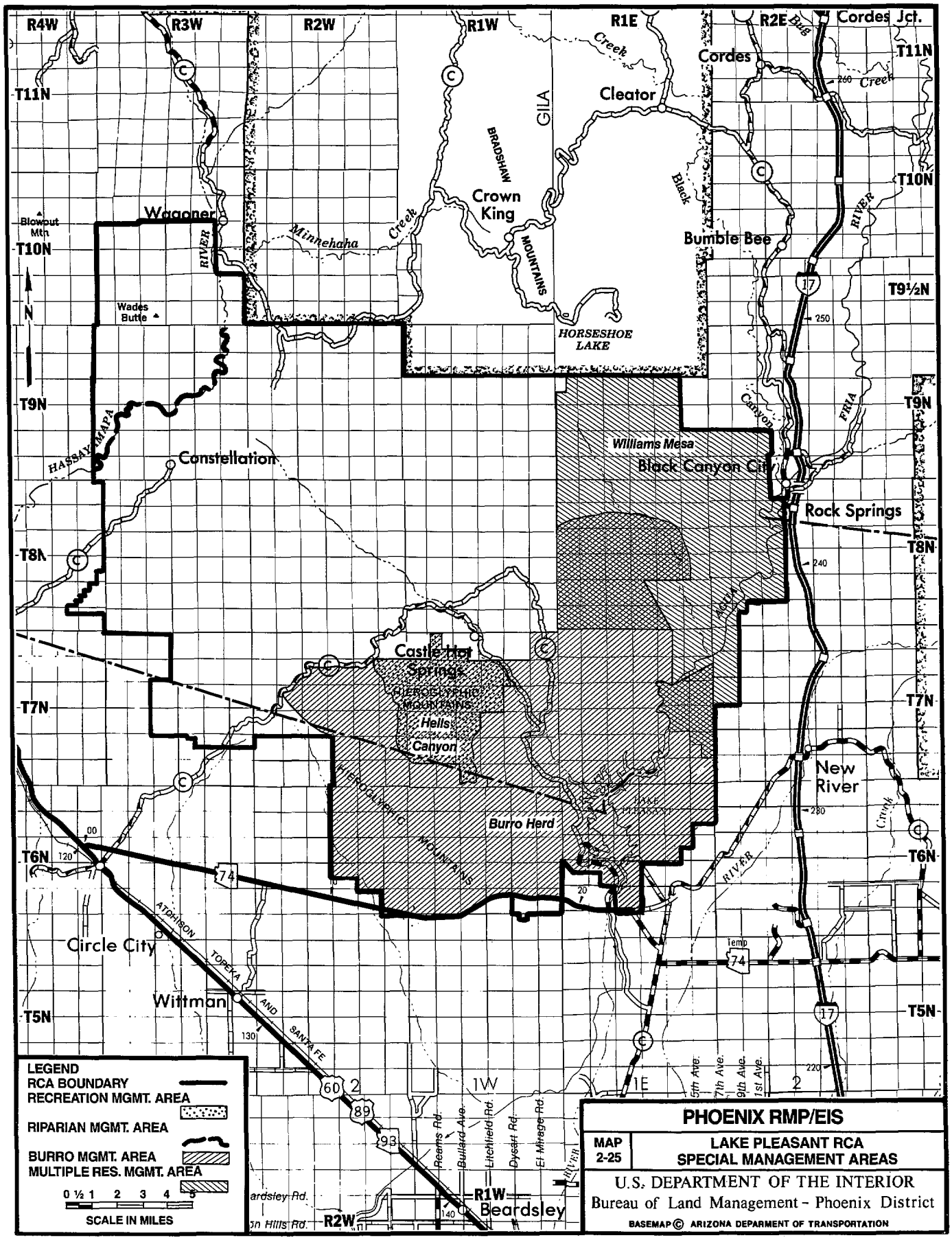

R4W
R3W
R2W
R1W
R1E
R2E
Cordes Jct.
T11N
T10N
T9½N
T9N
T8N
T7N
T6N
T5N
Cordes
Cleator
GILA
BRADSHAW
MOUNTAINS
Crown King
Black
Bumble Bee
Wagoner
Blowout Mtn
Minnehaha
Creek
RIVER
Wades Butte
HORSESHOE LAKE
HASSAYAMPA
Constellation
Williams Mesa
Black Canyon City
Rock Springs
Canyon
FRIA
Castle Hot Springs
HIEROGLYPHIC MOUNTAINS
Hells Canyon
Burro Herd
New River
Circle City
Wittman
ATCHISON TOPEKA AND SANTA FE
Temp
Beardsley
Reams Rd.
Bullard Ave.
Litchfield Rd.
Dysart Rd.
El Mirage Rd.
5th Ave.
7th Ave.
9th Ave.
1st Ave.
LEGEND
RCA BOUNDARY
RECREATION MGMT. AREA
RIPARIAN MGMT. AREA
BURRO MGMT. AREA
MULTIPLE RES. MGMT. AREA
0 ½ 1 2 3 4 5
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-25
LAKE PLEASANT RCA SPECIAL MANAGEMENT AREAS
U.S. DEPARTMENT OF THE INTERIOR
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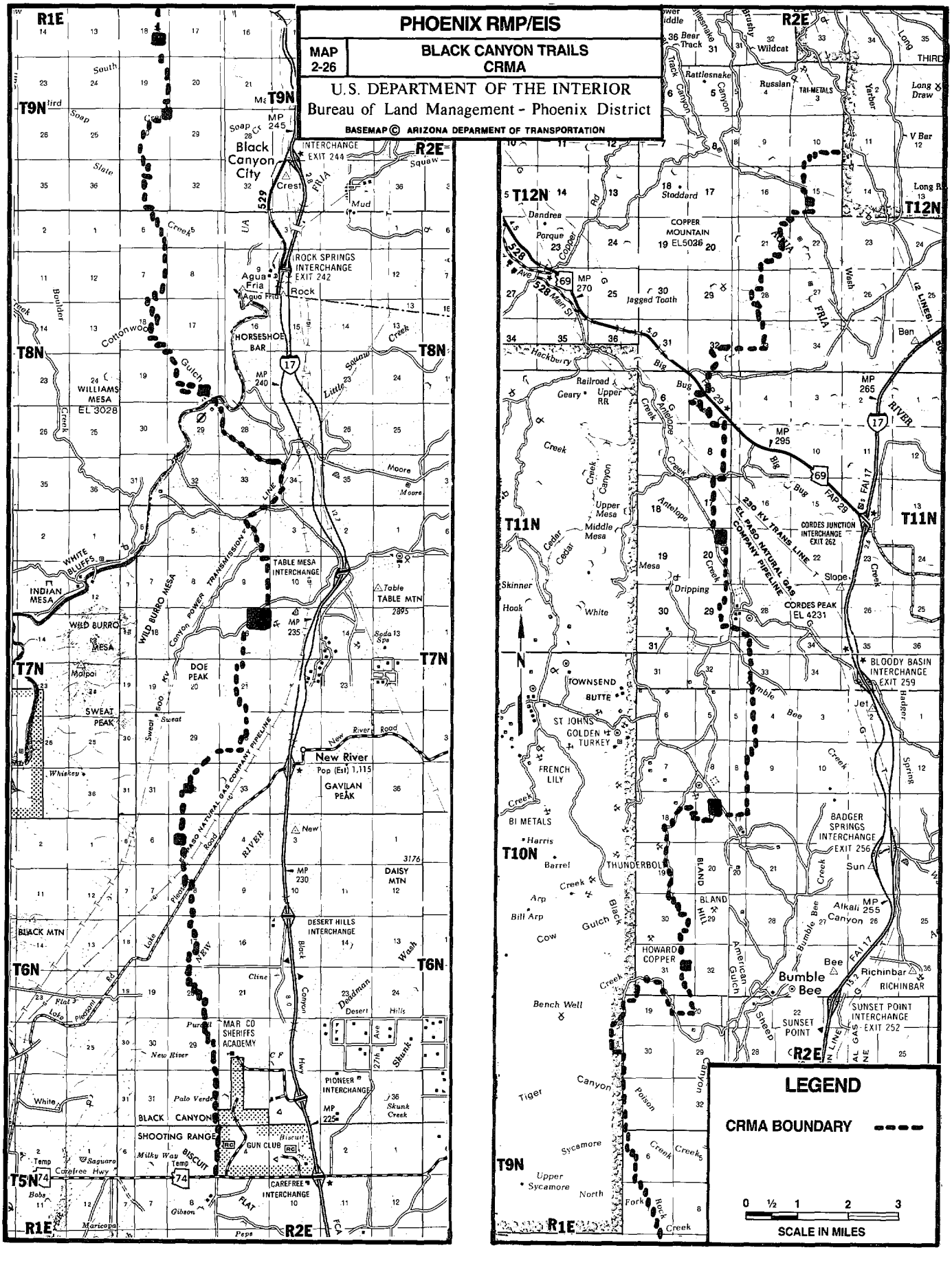
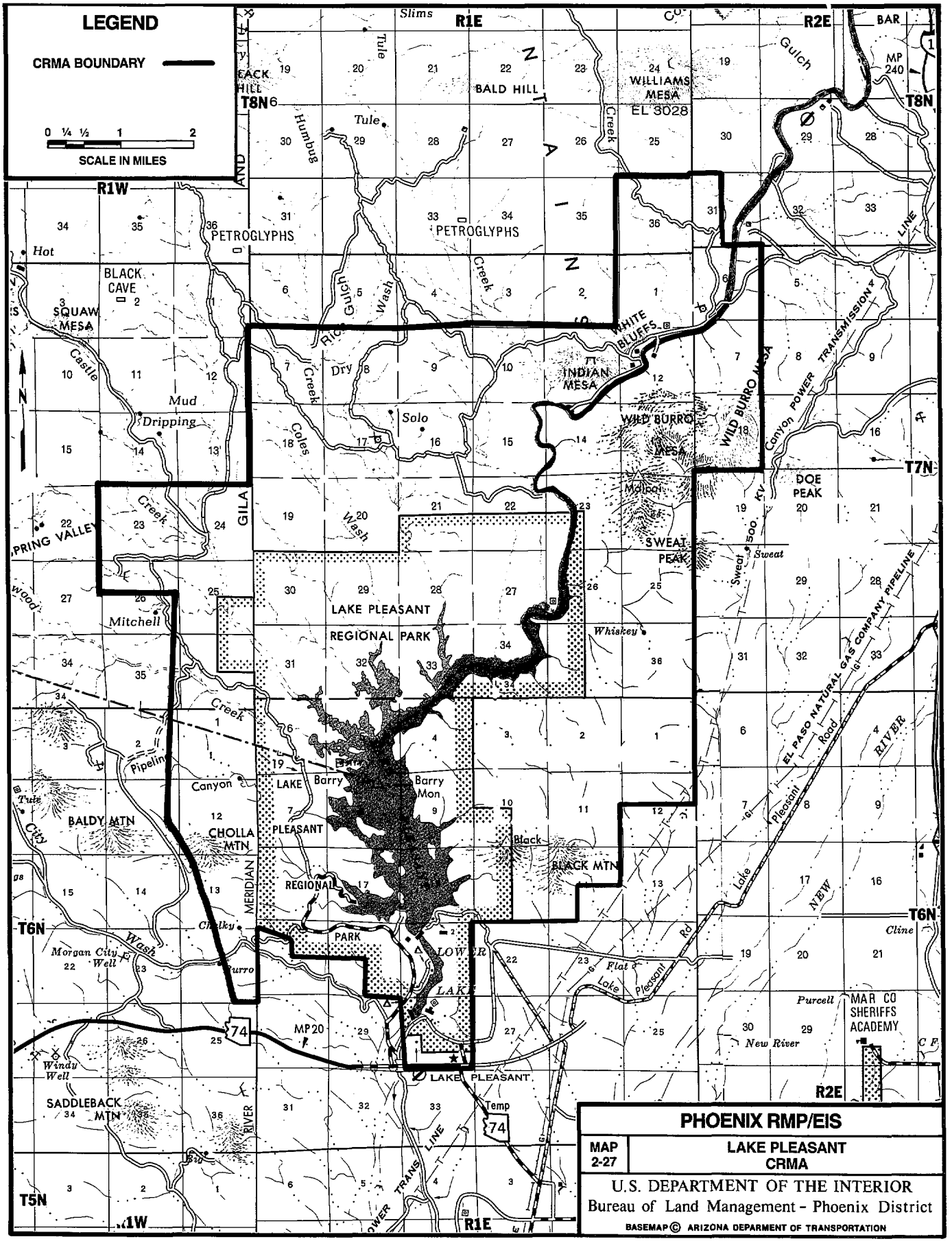
COOPERATIVE RECREATION MANAGEMENT AREAS

MAP NUMBER	NAME
2–26	BLACK CANYON TRAILS
2–27	LAKE PLEASANT
2–28	SAN TAN MOUNTAINS
2–29	TORTOLITA MOUNTAINS
2–30	SAWTOOTH MOUNTAINS


PHOENIX RMP/EIS
MAP 2-26
BLACK CANYON TRAILS CRMA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
BASEMAP © ARIZONA DEPARMENT OF TRANSPORTATION
LEGEND
CRMA BOUNDARY
0 ½ 1 2 3
SCALE IN MILES
Black Canyon City
INTERCHANGE EXIT 244
ROCK SPRINGS INTERCHANGE EXIT 242
HORSESHOE BAR
WILLIAMS MESA EL 3028
TABLE MESA INTERCHANGE
TABLE MTN 2895
DOE PEAK
SWEAT PEAK
New River
Pop (Est) 1,115
GAVILAN PEAK
DAISY MTN
DESERT HILLS INTERCHANGE
MAR CO SHERIFFS ACADEMY
PIONEER INTERCHANGE
BLACK CANYON
SHOOTING RANGE
GUN CLUB
CAREFREE INTERCHANGE
COPPER MOUNTAIN EL5026
Jagged Tooth
CORDES JUNCTION INTERCHANGE EXIT 262
CORDES PEAK EL 4231
BLOODY BASIN INTERCHANGE EXIT 259
BADGER SPRINGS INTERCHANGE EXIT 256
SUNSET POINT INTERCHANGE EXIT 252
HOWARD COPPER
THUNDERBOLT
BLAND HILL
Bumble Bee
Richinbar
RICHINBAR
SUNSET POINT
TOWNSEND
BUTTE
ST JOHNS
GOLDEN TURKEY
FRENCH LILY
BI METALS
Stoddard
Dandrea
Porque
Geary
Upper RR
Railroad
Hackbury
Upper Mesa
Middle Mesa
Dripping
Slope
Jet
Sun
Ben
Bench Well
Upper Sycamore
North Fork Rock Creek
EL PASO NATURAL GAS COMPANY PIPELINE
230 KV TRANS LINE
WILD BURRO MESA
INDIAN MESA
WHITE BLUFFS
Malpai
Wildcat
Russian
TRI-METALS
Rattlesnake
Bear Track
Long Draw
V Bar
Long R
THIRD
Yarbor
Brushy
Track Canyon
Rattlesnake Canyon
Cottonwood Gulch
Boulder Creek
Soap Creek
Slate Creek
Squaw Creek
Little Squaw Creek
Moore
Sweat
Whiskey
Pleasant Lake Rd
Flat Lake Pleasant
Purdy
Palo Verde
Milky Way
Biscuit
Carefree Hwy
Bobs
Gibson
Maricopa
Peps
Deadman Canyon
Desert Hills
Skunk Creek
Black Canyon Hwy
Cline
Ave
27th Ave
Bee
Bumble Bee
American Gulch
Sheep
Poison Canyon
Tiger Canyon
Sycamore Creek
Cedar Creek
Antelope Creek
Big Bug Creek
Skinner Hook
White Creek
Barrel Creek
Arp Creek
Bill Arp
Cow Gulch
Black Canyon
Alkali Canyon
Badger Spring
Bee Creek
Bumble Bee
Hwy 17
Hwy 69
Hwy 74
FAP 29
FAI 17
R1E
R2E
T9N
T8N
T7N
T6N
T5N
T12N
T11N
T10N


LEGEND
CRMA BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
R1E
R2E
R1W
T8N
T7N
T6N
T5N
BALD HILL
WILLIAMS MESA
EL 3028
PETROGLYPHS
BLACK CAVE
SQUAW MESA
WHITE BLUFFS
INDIAN MESA
WILD BURRO MESA
DOE PEAK
SWEAT PEAK
LAKE PLEASANT REGIONAL PARK
BALDY MTN
CHOLLA MTN
BLACK MTN
SADDLEBACK MTN
MAR CO SHERIFFS ACADEMY
EL PASO NATURAL GAS COMPANY PIPELINE
POWER TRANSMISSION LINE
MERIDIAN
GILA
RIVER
NEW RIVER
Lake Pleasant Rd
Canyon
Barry Mon
Black
Whiskey
Sweat
Purcell
New River
Temp
Morgan City Well
Windy Well
Mitchell
Dripping
Mud
Castle
Dry
Solo
Coles
Humbug
Tule
Slims
Gulch
Creek
Wash
Pipeline
Canyon
Flat
Cline
MP 240
MP 20
74
PHOENIX RMP/EIS
MAP 2-27
LAKE PLEASANT CRMA
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Bureau of Land Management - Phoenix District
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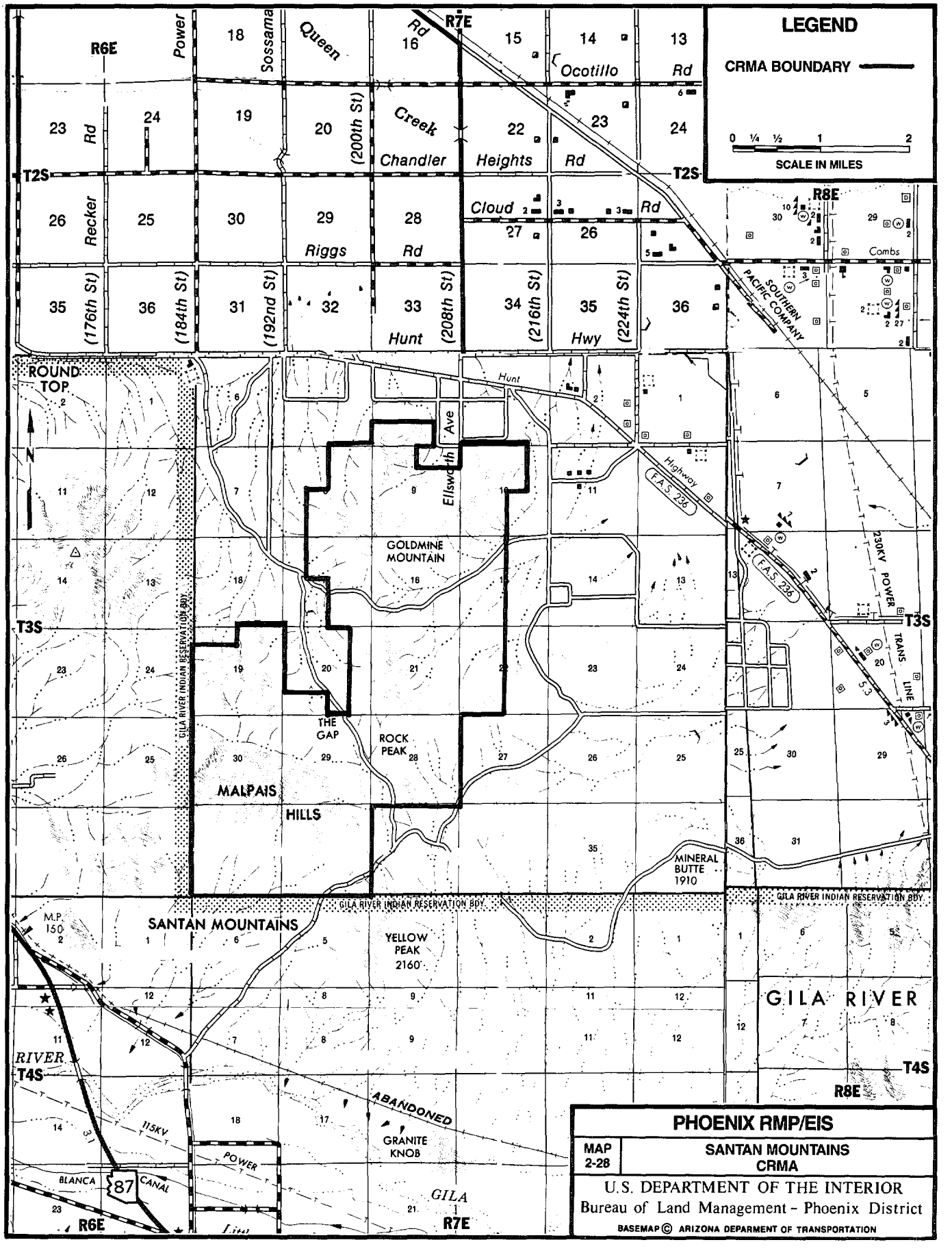
LEGEND
CRMA BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
R6E
R7E
R8E
T2S
T3S
T4S
Power Rd
Sossaman Rd
Queen Creek
Ocotillo Rd
Chandler Heights Rd
Cloud Rd
Recker Rd
Riggs Rd
Hunt Hwy
(176th St)
(184th St)
(192nd St)
(200th St)
(208th St)
(216th St)
(224th St)
Combs
SOUTHERN PACIFIC COMPANY
ROUND TOP
Hunt
Ellsworth Ave
Highway
F.A.S. 236
GOLDMINE MOUNTAIN
230KV POWER TRANS LINE
GILA RIVER INDIAN RESERVATION BDY
THE GAP
ROCK PEAK
MALPAIS HILLS
MINERAL BUTTE 1910
SANTAN MOUNTAINS
YELLOW PEAK 2160
M.P. 150
GILA RIVER
ABANDONED
GRANITE KNOB
115KV POWER
BLANCA CANAL
87
GILA RIVER
PHOENIX RMP/EIS
MAP 2-28
SANTAN MOUNTAINS CRMA
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Bureau of Land Management - Phoenix District
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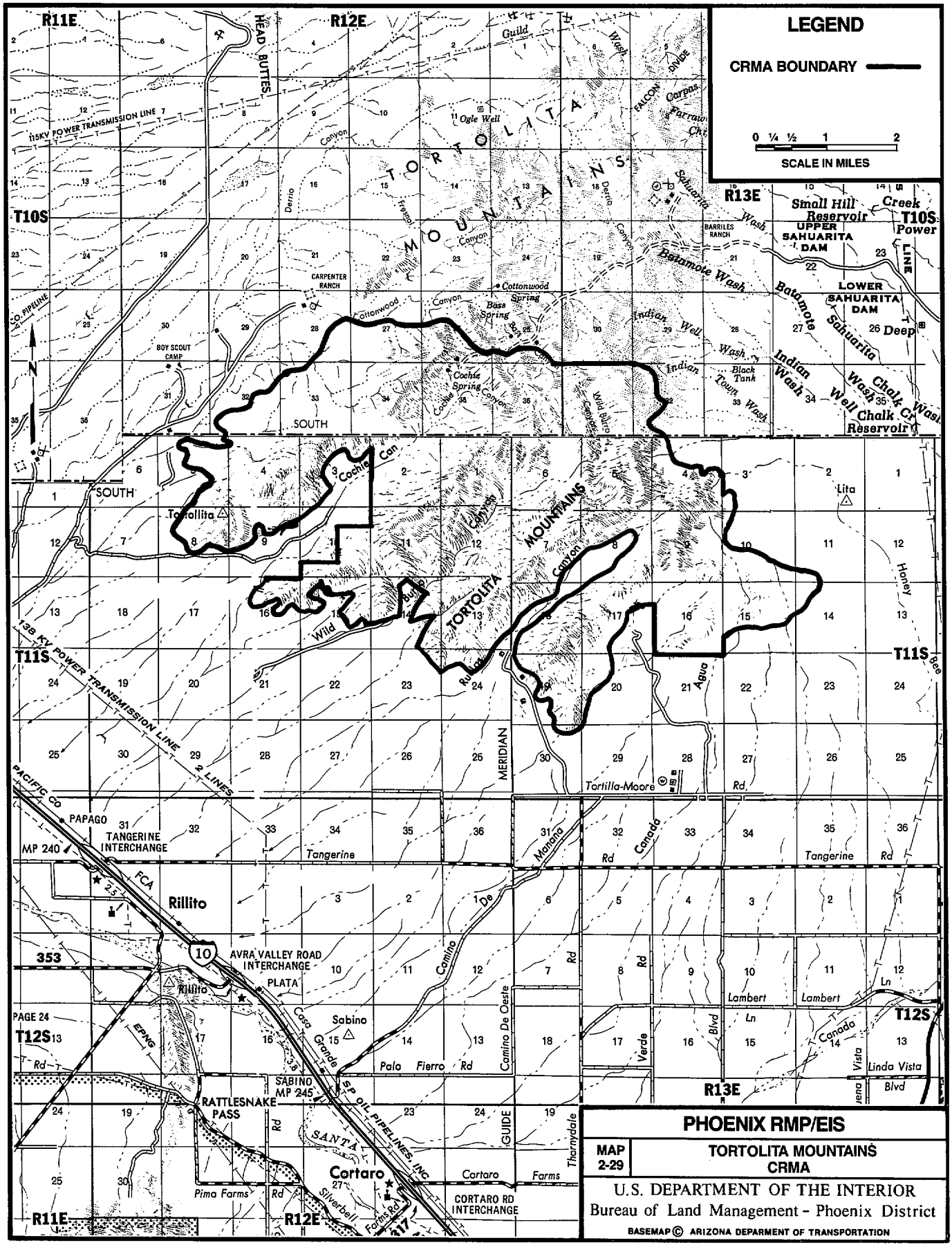
LEGEND
CRMA BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
R11E
R12E
R13E
T10S
T11S
T12S
TORTOLITA MOUNTAINS
Small Hill Reservoir
UPPER SAHUARITA DAM
LOWER SAHUARITA DAM
Chalk Reservoir
Tortollita
Lita
Rillito
Sabino
Cortaro
PAPAGO
TANGERINE INTERCHANGE
AVRA VALLEY ROAD INTERCHANGE
RATTLESNAKE PASS
CORTARO RD INTERCHANGE
SABINO MP 245
MP 240
PAGE 24
SOUTH
MERIDIAN
GUIDE
Tortilla-Moore Rd
Tangerine Rd
Palo Fierro Rd
Lambert Ln
Linda Vista Blvd
Cortaro Farms
Pima Farms Rd
Silverbell Farms Rd
Camino De Oeste
Camino De Manana
Canada
Verde Blvd
Thornydale
Casa Grande
Wild Burro Canyon
Cochie Can
Cottonwood Canyon
Indian Well Wash
Indian Town Wash
Batamote Wash
Sahuarita Wash
Chalk Cr Wash
Black Tank
Cochie Spring
Bass Spring
Cottonwood Spring
Ogle Well
Derrio Canyon
Fresnal Canyon
Guild Wash
Carpas Farrow Chi
Sahuarita Wash
Honey Bee
Agua
Deep
Power
Creek
115KV POWER TRANSMISSION LINE
138 KV POWER TRANSMISSION LINE 2 LINES
SP OIL PIPELINES, INC
SANTA
EPNG
PACIFIC CO
FCA
HEAD BUTTES
FALCON DIVIDE
CARPENTER RANCH
BOY SCOUT CAMP
BARRILES RANCH
CO. PIPELINE
PHOENIX RMP/EIS
MAP 2-29
TORTOLITA MOUNTAINS CRMA
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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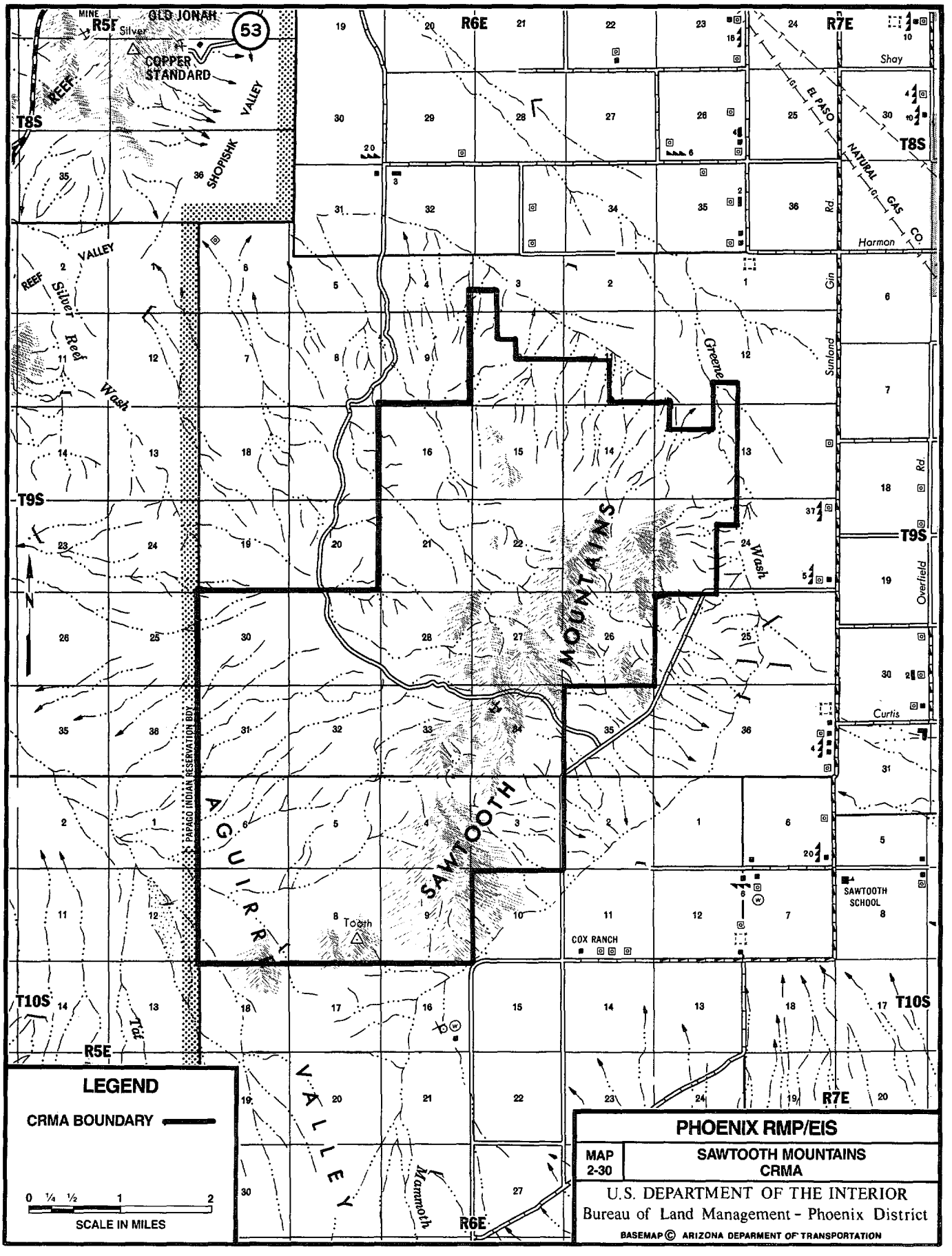

OLD JONAH
MINE
Silver
COPPER STANDARD
53
REEF
VALLEY
SHOPISHK
R5E
R6E
R7E
T8S
T9S
T10S
Shay
EL PASO NATURAL GAS CO.
Harmon
Gin Rd.
Sunland
Greene Wash
Silver Reef Wash
Overfield Rd.
Curtis
SAWTOOTH MOUNTAINS
AGUIRRE VALLEY
PAPAGO INDIAN RESERVATION BDY.
Tooth
COX RANCH
SAWTOOTH SCHOOL
Tat
Mammoth
LEGEND
CRMA BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-30
SAWTOOTH MOUNTAINS CRMA
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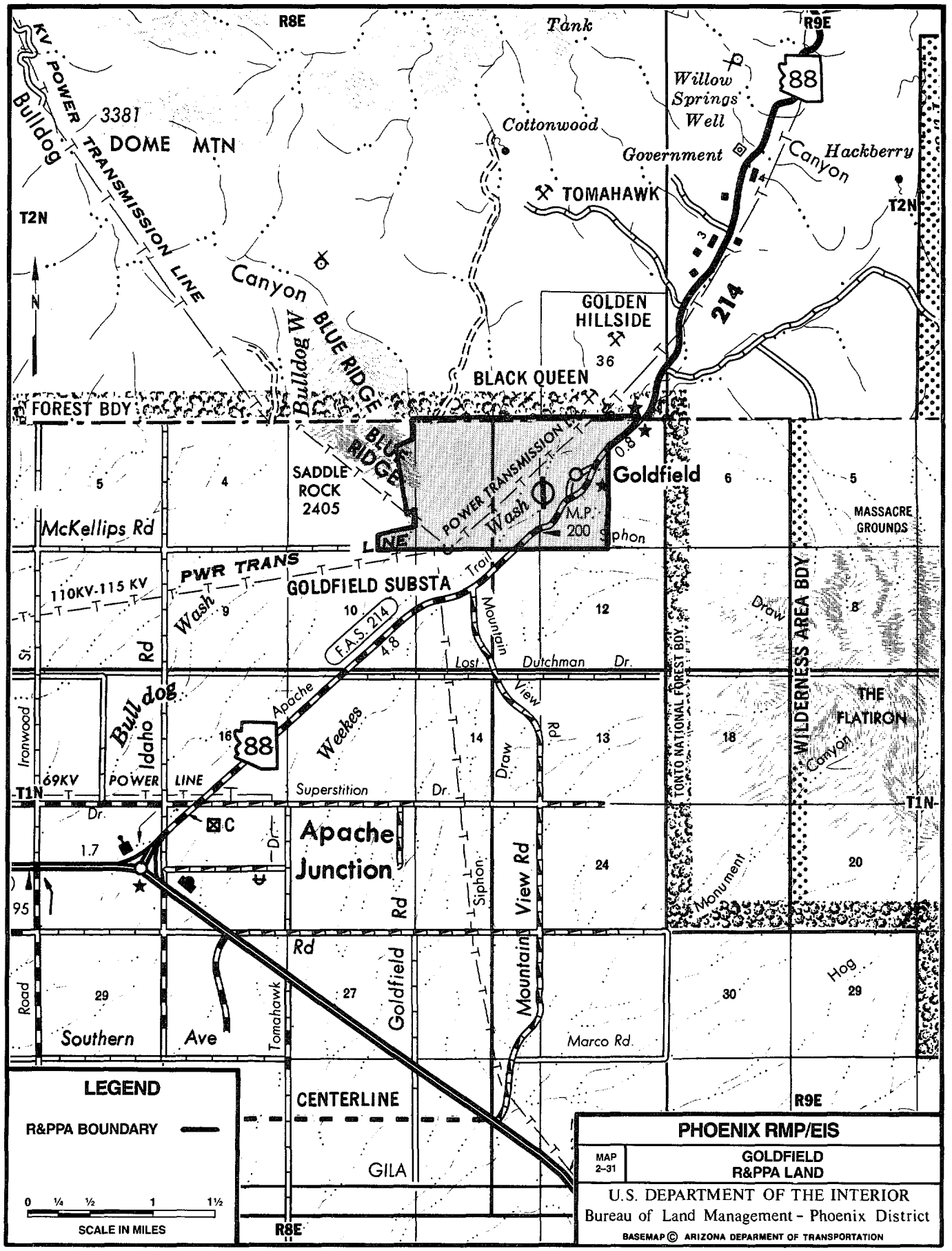
RECREATION & PUBLIC PURPOSE LANDS

MAP NUMBER	NAME
2–31	GOLDFIELD
2–32	PICACHO RESERVOIR
2–33	ZION RESERVOIR
2–34	SAGINAW HILL & TUCSON MOUNTAIN PARK EXTENSION


R8E
R9E
Tank
Willow Springs Well
Cottonwood
Government
Hackberry
Canyon
TOMAHAWK
88
214
KV POWER TRANSMISSION LINE
Bulldog
3381
DOME MTN
T2N
Canyon
Bulldog W
BLUE RIDGE
GOLDEN HILLSIDE
36
BLACK QUEEN
FOREST BDY
SADDLE ROCK 2405
POWER TRANSMISSION LINE
Wash
Goldfield
M.P. 200
Siphon
MASSACRE GROUNDS
McKellips Rd
PWR TRANS
110KV-115 KV
GOLDFIELD SUBSTA
Trail
Mountain
Draw
F.A.S. 214
4.8
Lost Dutchman Dr.
Apache
Weekes
View Rd
THE FLATIRON
TONTO NATIONAL FOREST BDY
WILDERNESS AREA BDY
Ironwood St.
Idaho Rd
69KV POWER LINE
Superstition Dr.
T1N
Apache Junction
Siphon
Mountain View Rd
Monument
Hog
Road
Southern Ave
Tomahawk
Goldfield Rd
Marco Rd.
CENTERLINE
GILA
LEGEND
R&PPA BOUNDARY
0 ¼ ½ 1 1½
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-31
GOLDFIELD R&PPA LAND
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Bureau of Land Management - Phoenix District
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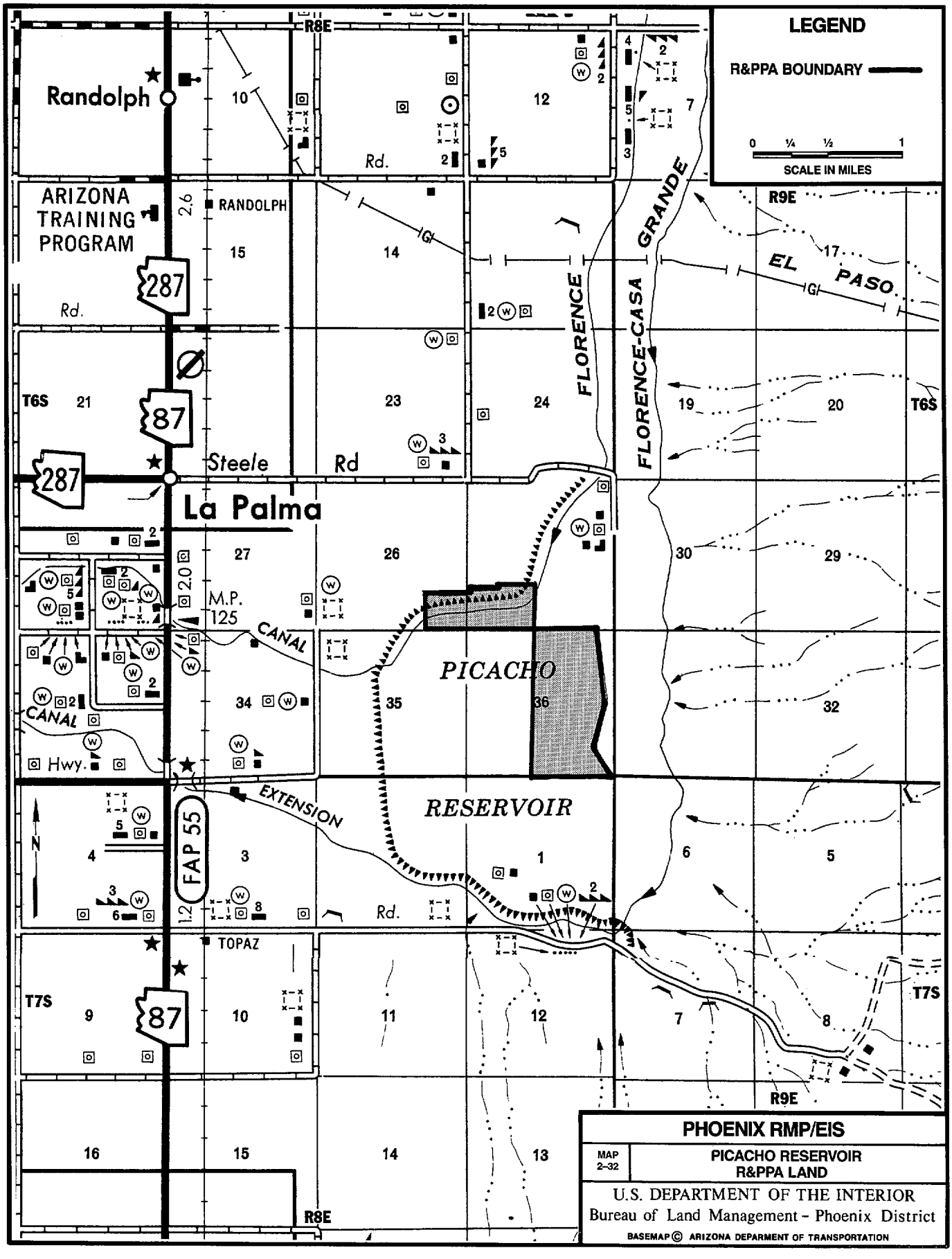
LEGEND
R&PPA BOUNDARY
0 ¼ ½ 1
SCALE IN MILES
Randolph
ARIZONA TRAINING PROGRAM
RANDOLPH
287
87
Steele Rd
La Palma
M.P. 125
CANAL
PICACHO
RESERVOIR
EXTENSION
FAP 55
Hwy.
TOPAZ
FLORENCE
FLORENCE-CASA GRANDE
EL PASO
R8E
R9E
T6S
T7S
PHOENIX RMP/EIS
MAP 2-32
PICACHO RESERVOIR R&PPA LAND
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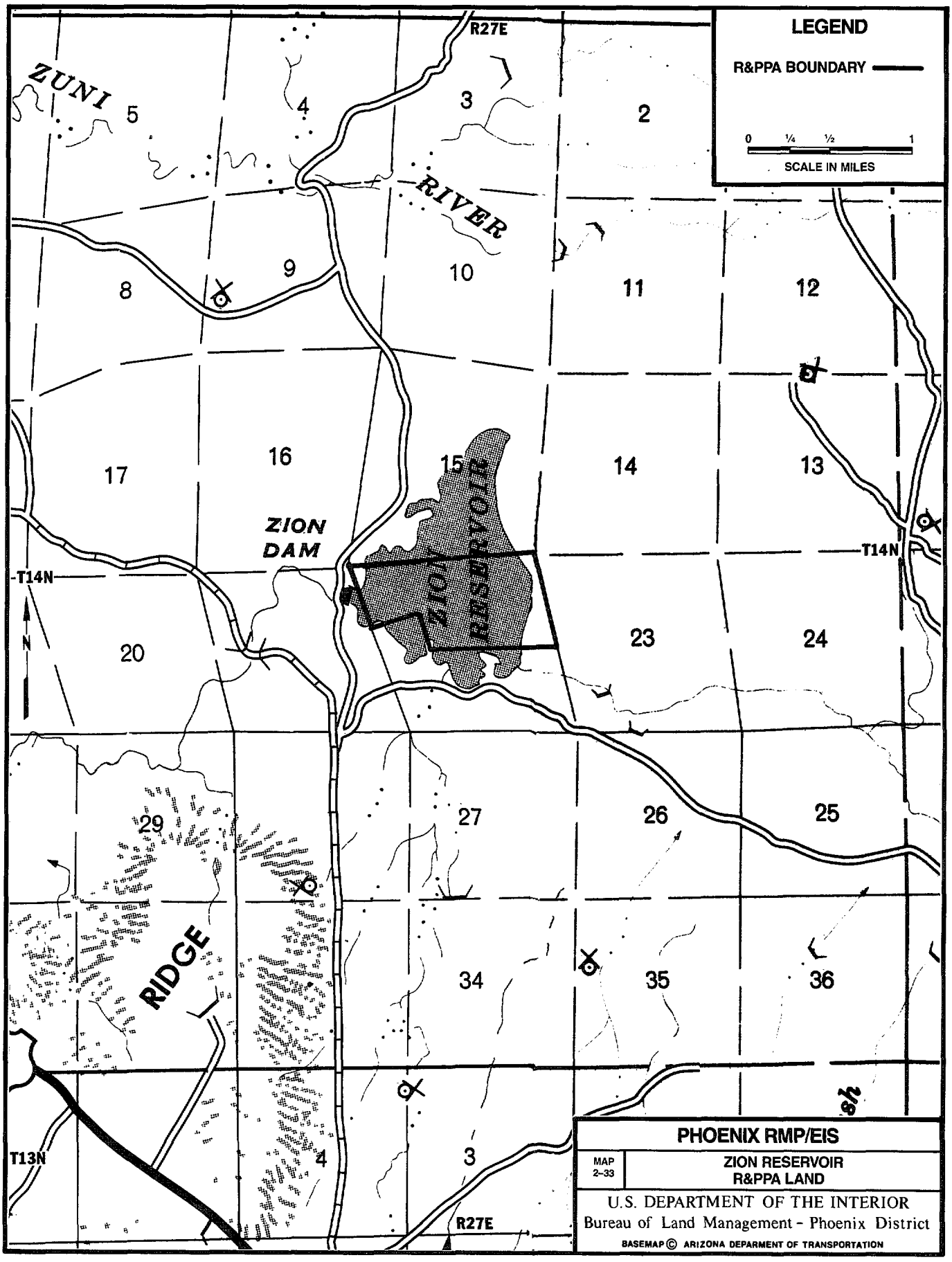
LEGEND
R&PPA BOUNDARY
0 ¼ ½ 1
SCALE IN MILES
R27E
ZUNI
RIVER
ZION DAM
ZION RESERVOIR
T14N
T13N
N
RIDGE
PHOENIX RMP/EIS
MAP 2-33
ZION RESERVOIR R&PPA LAND
U.S. DEPARTMENT OF THE INTERIOR
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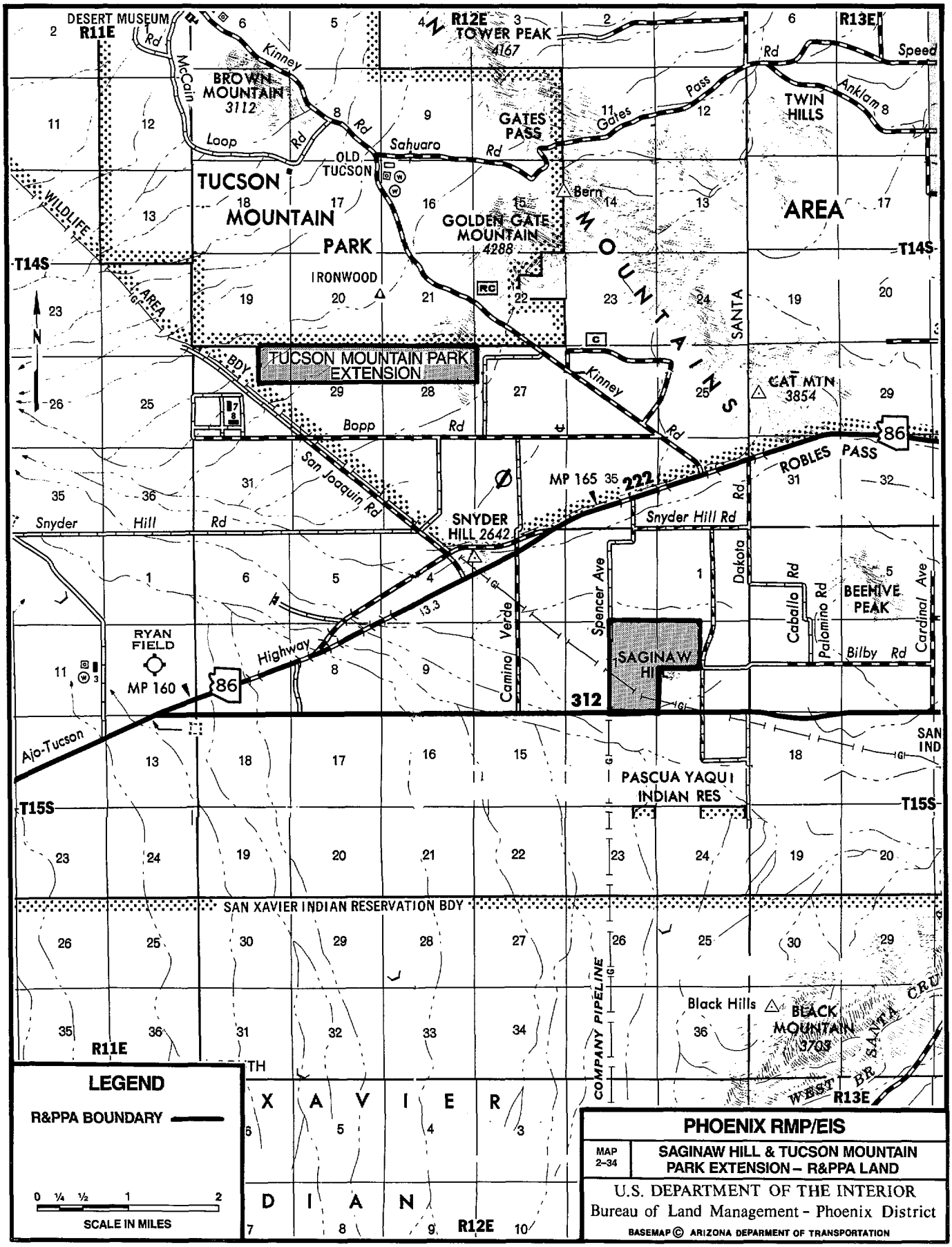
DESERT MUSEUM
R11E
R12E
R13E
TOWER PEAK
4167
BROWN MOUNTAIN
3112
McCain Loop Rd
Kinney Rd
Sahuaro Rd
OLD TUCSON
GATES PASS
Gates Pass Rd
Speed Rd
Anklam Rd
TWIN HILLS
TUCSON MOUNTAIN PARK
WILDLIFE AREA
IRONWOOD
GOLDEN GATE MOUNTAIN
4288
Bern
SANTA CATALINA MOUNTAINS
AREA
T14S
TUCSON MOUNTAIN PARK EXTENSION
BDY
Bopp Rd
CAT MTN
3854
ROBLES PASS
86
San Joaquin Rd
MP 165
222
Snyder Hill Rd
SNYDER HILL 2642
Spencer Ave
Dakota Rd
Caballo Rd
Palomino Rd
BEEHIVE PEAK
Cardinal Ave
Bilby Rd
RYAN FIELD
MP 160
Highway
Camino Verde
SAGINAW HILL
312
Ajo-Tucson
SAN IND
PASCUA YAQUI INDIAN RES
T15S
SAN XAVIER INDIAN RESERVATION BDY
COMPANY PIPELINE
Black Hills
BLACK MOUNTAIN
3705
WEST BR SANTA CRUZ
SOUTH XAVIER INDIAN
R12E
LEGEND
R&PPA BOUNDARY
0 ¼ ½ 1 2
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-34
SAGINAW HILL & TUCSON MOUNTAIN PARK EXTENSION – R&PPA LAND
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
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AFFECTED ENVIRONMENT 3

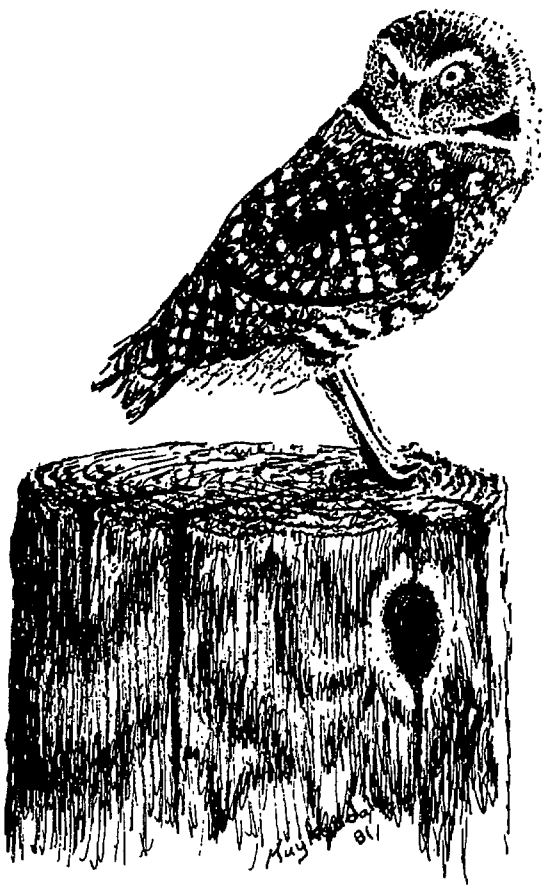
CHAPTER 3

AFFECTED ENVIRONMENT

Introduction

The affected environment describes the "environmental issues" identified by the BLM interdisciplinary planning team. An environmental issue is a value that would be significantly impacted by implementing the Proposed RMP. A detailed analysis of how the environmental issues were chosen is found in Chapter 1 of the draft RMP/EIS.

The environmental issues identified for this Proposed RMP are the same as those identified in the draft RMP/EIS document for the other alternatives, therefore, the affected environment section will not be reprinted here. Refer to Chapter 3 of the draft RMP/EIS for a description of the affected environment.



Errata And Other Changes To Chapter 3 Of The Draft RMP/EIS

1. Table 3-13, page 108: Little Colorado River spinedace is now a federally listed threatened species; Gilbert's skink is a state-listed, not a category 2 candidate species.
2. Map 3-4A, page 116: the Tortolita Mountains should be identified as important desert tortoise habitat; the legend for desert bighorn sheep and desert tortoise should be preceded by "known important."
3. New Information: Special Status Plants
   A. Sword milkvetch *(Astragalus xiphoides)* - Two new public land localities and additional populations within the Petrified Forest National Park are documented.
   B. Paperspined cactus *(Pediocactus papyracanthus)* - Recent inventories of public land within suitable habitat indicate the species is more abundant than previously thought; up to 900 plants per square mile.

ENVIRONMENTAL CONSEQUENCES 4

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

Introduction

Chapter 4 discusses the environmental consequences of implementing the Proposed RMP described in Chapter 2 of this RMP/FEIS. The analysis will be commensurate with the degree of expected impact. Those resource values not impacted to a significant degree are identified in Chapter 1 of the draft RPM/EIS and are not discussed further in this chapter.

General Assumptions

In order to analyze the impacts of the Proposed RMP it was necessary to make general assumptions. These assumptions are as follows:

1. The BLM will have the funding and work force to implement the Proposed Plan.
2. Impacts are direct unless otherwise noted.
3. Impacts will be monitored and management adjusted as necessary, based on new data derived from monitoring.
4. Short-term impacts occur within five years and long-term impacts from five to 20 years after implementation of the plan.
5. All impacts are long-term unless otherwise noted.
6. Environmental assessments will be conducted prior to implementing any activity plans.
7. It is assumed that all disposal land is free of encumbrances and is available for disposal.
8. Land identified for disposal is assumed to go into private ownership unless otherwise noted.
9. Management of the RMP area's rangeland management program will be as described in the Final Eastern Arizona Grazing EIS (See Appendices 2 and 3 of the draft RMP/EIS).
10. Implementation of RMP decisions within wilderness study areas would only take place if those WSAs are not designated as wilderness.

Impacts Of The Proposed Resource Management Plan

EFFECTS ON LAND USES

Land Ownership

Under the Proposed RMP, total public land ownership in the RMP area would be reduced 12 percent from 911,343 acres of federal surface estate to **802,526 acres** of federal surface estate, assuming that all state land **within the identified RCAs is acquired by exchange**. However, the public land that is retained and the acquired land would form a more manageable pattern. Consolidation of land in the seven resource conservation areas (RCAs) would improve management efficiency and thus reduce management costs.

Under the Proposed RMP, the disposal of **391,803 acres** by exchange and **45,000 acres** by exchange or sale would eliminate a fragmented public land pattern that is difficult and inefficient to manage. Also, consolidation of federal surface and subsurface estates would eliminate problems in managing split estate land.

Land Available for Recreation and Other Public Purposes

The Proposed RMP identifies a total of **2,800 acres** as suitable for transfer to state and local government entities or agencies under the R&PP Act (Table 2-5). This land would be available for special public purposes at little or no cost. State and local governments would benefit from the low cost land available for parks, recreation sites and wildlife protection areas.

Right-of-Way Development

The Proposed RMP identifies five communication sites (Table 2-2) on 315 acres and limits communication site development within the RCAs to designated areas. Existing users on nondesignated facilities would be allowed to remain. Communication site users on land identified for disposal would be

of this area of interest lies within the bounds of the proposed Black Canyon RCA. Mineral development in this area would benefit because mineral developers would be required to deal with the laws and regulations of only one agency. A significant level of activity has been established outside the proposed RCA boundaries in an area between Prescott and Cordes Junction where proposed land disposals under the Proposed RMP would lead to an 85 percent decline in mineral exploration and development.

Under the Proposed RMP, mineral activity on land disposed of in the Goldfield and Superstition mountains area is expected to stop altogether. The new landowners would likely be more interested in residential and/or commercial development than marginal mineral development.

In the Miami-Globe area the impact of disposal would be less significant because residential development is currently less likely than in the Apache Junction area near the Goldfield and Superstition mountains. A 40 percent reduction in minerals activity on federal land is expected here. However, the development of any existing, but undelineated, porphyry copper bodies in this area is not expected. To the east, in the Mineral Butte area, mineral activity on disposal land would cease altogether.

Within the boundaries of the proposed White Canyon RCA, mineral activity would continue or even increase somewhat because the proposed acquisitions should open new land to mineral activity.

In the southern portion of the RMP area, a decline in mineral activity on all public land outside the proposed Baboquivari and Silver Bell RCAs is expected. However, this would be offset somewhat by an increased interest in acquired land within the RCAs. Of greatest significance would be a 85 to 95 percent decline in prospecting and exploration activity on federal land identified for disposal south of Tucson. It is here that the greatest potential exists for future development of yet unknown porphyry copper bodies. Overall this could be the most significant impact of all under the Proposed RMP.

Conclusion (Locatable Mineral Development): Expect a 50 percent reduction in mining notices **(from 25 to 12 per year)** and a 75 percent reduction of MPOs **(from 2 to about 1 per year)** filed in the RMP area.

EFFECTS ON WATERSHED CONDITION

Under the Proposed RMP, adopted management changes would affect watershed condition. Within RCA boundaries those allotments which have the greatest number of important resource values (Table 2-4) would receive priority for project work. Where those allotments are identified as Category IV watersheds, an activity plan would be prepared to identify and implement, among other things, watershed improvement projects. Subsequent improvement of the watershed would increase soil cover and infiltration, reduce erosion, sediment yield, peak flows and dust emissions, maintain soil productivity and, in some areas, enhance stream flow. Air and water quality would also be enhanced.

Such change in watershed conditions and function would have a significant positive impact. Watershed improvement work is proposed on six allotments (204,000 acres). This figure includes 111,000 of the RMP area's 246,000 acres in Category IV watersheds and includes 93,000 acres of acquired land.

The other major action under the Proposed RMP to benefit watershed conditions and related values would be the imposition of off-road vehicle restrictions. Although the trends in watershed conditions are assumed to be static, population trends indicate that recreation demands, including that of ORV use, will increase. Soils in some watersheds are particularly prone to accelerated erosion after ORV disturbance. ORV restrictions would prevent the further decline of these watersheds. Under the Proposed RMP, ORV restrictions or transfer of ownership would prevent further degradation of 182,000 acres of land currently held in public ownership, 85,000 of which have slightly to strongly saline soils.

Conclusion (Watershed Condition): Significant improvements would occur to **111,000 acres** on six Category IV allotments. ORV designations would allow existing acceptable conditions on Category II allotments to be maintained.

EFFECTS ON RANGELAND MANAGEMENT

Under the Proposed RMP, ranch operations within the seven RCAs would benefit from the BLM's consolidation program. Ranch operators would have to deal with the grazing regulations of only one agency and the BLM would be able to develop rangeland improvements on these allotments as a cohesive unit, thereby increasing the effectiveness of such improvements.

Ranch values of those ranches within the RCAs would not be affected by the acquisition of state land by the BLM as lease values on BLM and Arizona State Land Department land are comparable.

The Proposed RMP would result in the disruption of some ranch operations which lie outside the identified RCAs. If public land within a ranch is disposed to private interests in areas of growth and development, livestock would likely be fenced out. Where such fencing renders improvements ineffective, development of improvements such as wells and pipelines would require large investments of time and money.

In areas identified for disposal where development does not occur, grazing is expected to continue because blocks of public land acquired by private owners would in most cases be available for lease to the rancher. However, grazing fees on such land may be substantially more than those charged by the federal government.

Under the Proposed RMP, ranches grazing public land identified for disposal may undergo a reduction in ranch values if federal grazing leases are cancelled. This would only occur on land transferred from federal to private ownership. On land transferred from federal to state ownership, the Arizona State Land Department generally has chosen to maintain grazing privileges.

The value of ranches lying outside the RCA boundaries would be reduced if federal grazing leases were cancelled and not replaced by state leases.

Without federal leases, the average values of small, medium and large ranches would be lowered, respectively, from $57,000 to $41,610, from $208,000 to $189,280 and from $780,000 to $756,600. Values of ranches within the RCAs would not change.

Conclusion (Rangeland Management): The value of ranches lying outside RCA boundaries would be reduced if federal grazing leases were cancelled and not replaced by state leases. Value reductions would average 27 percent for small ranches, nine percent for medium-sized ranches and three percent for large ranches. Consolidating public land on ranches in the RCAs would eliminate management complications caused by checkerboard ownership.

EFFECTS ON AREAS OF CULTURAL SIGNIFICANCE

Under the Proposed RMP, land acquisitions within five significant cultural areas would have a positive effect on at least 285 sites. These five areas include: Avra Valley, Santa Ana del Chiquiburitac, Reymert Townsite, Middle Gila and Perry Mesa. The BLM would be able to focus management efforts on the protection and enhancement of the information, public and conservation values provided by the sites.

Disposal of public land under the Proposed RMP would impact cultural values in five of the ten identified areas of cultural significance. These areas are Zuni-Hardscrabble, Snowflake-Mesa Redonda, Upper Little Colorado, Lower Texas Gulch and Lower Agua Fria. Existing laws, regulations and memoranda protect, through mitigation, the information values that would be derived from cultural sites. However, public and conservation values of properties in the five disposal areas would be lost under this alternative.

ACEC and SMA designations would benefit high value cultural resources in Santa Ana del Chiquiburitac, Avra Valley, Middle Gila, Reymert and Perry Mesa. Long-term protection and enhancement of at least 285 sites in the above five areas would result.

Cultural resources within recommended utility corridors in Middle Gila and Avra Valley could be dealt with on a one-time basis. Avoidance and mitigation of properties would be performed before utility system development could take place. Therefore, the information value of all cultural sites within the path of utility system development would be derived.

Limiting ORV use to existing roads and trails would benefit archaeological sites only slightly. However, direct and indirect impacts to at least 388 properties would probably continue and road closures at Reymert and Santa Ana would benefit these sites.

Table 4-2 shows how cultural properties in each of the 10 significant cultural areas would fare under the Proposed RMP.

Conclusion (Areas of Cultural Significance): Land acquisitions and ACEC and SMA designations which specify management for Santa Ana del Chiquiburitac, Avra Valley, Reymert Townsite, Middle Gila and Perry Mesa would result in long-term positive effects on at least 285 sites. On land identified for disposal, 105 sites would suffer a 10 to 25 percent loss of cultural value.

TABLE 4-2

Loss of Cultural Values in 10 Significant Areas over 20 Years Bureau of Land Management, Phoenix District, Arizona

Cultural Area	Deterioration Type*	Proposed RMP	Under Current Management
Santa Ana Chiquiburitac	I	1%	2%
	II	0	2
	III	0	0
	IV	1	1
TOTAL		5%	5%
Avra Valley	I	1%	3%
	II	0	2
	III	2	2
	IV	1	3
TOTAL		5%	10%
Reymert Townsite	I	1%	6%
	II	0	4
	III	0	3
	IV	3	7
TOTAL		5%	20%
Middle Gila Archaeological Zone	I	1%	8%
	II	2	4
	III	1	4
	IV	1	4
TOTAL		5%	20%
Perry Mesa Archaeological District	I	1%	6%
	II	1	3
	III	0	4
	IV	2	2
TOTAL		5%	15%
Lower Agua Fria Valley	I	10%	10%
	II	5	5%
	III	5	5%
	IV	5	5%
TOTAL		25%	25%
Lower Texas Gulch	I	4%	4%
	II	2	2
	III	1	1
	IV	3	3
TOTAL		10%	10%
Zuni-Hardscrabble Region	I	11%	7%
	II	4	3
	III	2	2
	IV	3	3
TOTAL		20%	15%
Upper Little Colorado Region	I	11%	7%
	II	4	4
	III	3	2
	IV	2	2
TOTAL		20%	15%
Snowflake-Mesa Redonda Region	I	13%	10%
	II	7	5
	III	2	2
	IV	3	3
TOTAL		25%	20%

*Deterioration Type: I. Vandalism
II. ORV
III. Utility Corridor/Communication Site
IV. Natural Processes

NOTE: Value estimates are based on the judgment of the RMP Team Archaeologist and are intended to illustrate relative impacts.
Source: Phoenix District files.

EFFECTS ON VEGETATION

Under this alternative, coordinated resource management plans would be developed for nine grazing allotments to benefit many important resources. These plans would incorporate grazing management, watershed management, habitat management and riparian management into one activity plan. Implementation would result in improving the ecological condition on nine grazing allotments. Some sites would improve faster than others, however. The average condition of each area would be expected to improve approximately 25 percent **over the long term**.

Conclusion (Vegetation): Implementation would result in a 25 percent improvement of ecological site condition on nine allotments encompassing **243,000 acres** of public land.

EFFECTS ON RIPARIAN HABITAT

Under the Proposed RMP, **73.5** of the RMP area's 94 miles of public riparian habitat (see Appendix 7 of the draft RMP/EIS) would be retained in federal ownership and the BLM would pursue the acquisition of **53.9 miles** of state-owned riparian habitat within the RCAs . Overall, the amount of riparian habitat on public land in the RMP area would increase 36 percent. Riparian management would be emphasized on **60.4 miles** within eight special management areas (Table 4-3) to improve habitat condition.

Larry Canyon would be managed as an ACEC to maintain the pristine riparian deciduous forest community. Land use restrictions under the designation would ensure maintenance of the the canyon's pristine riparian community.

A total of 630 acres of riparian habitat, including portions of Zion and Picacho reservoirs, would be transferred to the AG&FD under the R&PPA to be managed as aquatic and wildlife communities.

Under the Proposed RMP, 20 miles of riparian habitat area would be disposed of through exchanges (see Appendix 7 of the draft RMP/EIS). The land probably would not be managed with the overall objective of maintaining and improving riparian habitat but would be subject to impacts from unregulated activities such as ORVs, mining, grazing, rights-of-way construction, land treatments and water removal.

Conclusion (Riparian Habitat): Acquiring **53.9 miles** of habitat would increase public riparian habitat in the RMP area by 36 percent. **Forty-seven percent** of all **riparian** habitat would be managed to improve current condition.

EFFECTS ON SPECIAL STATUS PLANTS

Peebles Navajo Cactus - *Pediocactus peeblesianus* var. *peeblesianus* - Federally listed - Endangered. Under the Proposed RMP, the BLM would retain about **950 acres** of known habitat for the Peebles Navajo cactus. In addition, the BLM

TABLE 4-3

Riparian Areas Proposed for Special Management
Bureau of Land Management, Phoenix District, Arizona

Habitat Name	Special Management Area	Miles
Agua Fria	Williams Mesa	5.0
Arrastre Creek	Bumble Bee	2.7
Bumble Bee Creek	Cordes Junction and Bumble Bee	7.7
Hassayampa River	Hassayampa River Riparian	10.7
Larry Creek	Larry Canyon ACEC	0.4
Castle Creek	Bumble Bee	0.9
Sycamore Creek	Sycamore Creek	0.8
Cottonwood Gulch	Williams Mesa	0.2
Antelope Creek	Bumble Bee	2.7
Gila River	Gila River Riparian	15.0
White Canyon	White Canyon ACEC	3.1
Walnut Canyon	White Canyon ACEC	1.2
Tule Creek	Williams Mesa	2.6
Boulder Creek	Williams Mesa	7.4

Source: Phoenix District files.

would acquire 1,280 acres of state land and identify up to **2,420 acres** of private land which either have known populations of the species or would be needed for the management and protection of existing populations (Table 4-4).

Table 4-4

Special Status Plant Habitat Acreages
Bureau of Land Management, Phoenix District, Arizona

Plant	Proposed RMP*	Under Current Management
Peebles Navajo cactus	**4,650**	**950**
Tumamoc globeberry	**123,200**	**126,000**
Nichol Turk's head cactus	**3,100**	**1,960**
Thornber fishhook cactus	**34,000**	**30,000**
Sword milkvetch	**1,280**	**1,560**
Paperspined cactus	**0**	**40,000**

***Acreages include BLM, state and private land within the acquisition area.**
Source: Phoenix District files.

Overall land tenure adjustments under the Proposed RMP **could** result in **4,650 acres of suitable** habitat in public ownership, a **600 percent** increase over the existing situation.

Acquisition of the identified state and private land would place all known populations of the plant under the protection of the *Endangered Species Act* (ESA). The federal and acquired land would be designated as the **4,650-acre** Tanner Wash ACEC and managed to protect and promote recovery of the species.

Conclusion (Peebles Navajo Cactus): Land acquisition could result in a 600 percent increase of suitable habitat in public ownership. Extending federal protection to all known populations and acquiring suitable habitat would promote recovery of the species.

Tumamoc Globeberry - *Tumamoca macdougalii* - Federally listed - Endangered. Under the Proposed RMP, the BLM would retain about 5,740 acres of occupied habitat with 40 plants while disposing of 1,060 acres with eight plants. The BLM would dispose of approximately 33,000 acres of habitat with a high to moderate potential for occurrence of *Tumamoca* while retaining about 86,200 acres and acquiring up to 31,300 acres of such habitat within the proposed Silver Bell RCA. Overall, this would result in about 123,200 acres of occupied and potential habitat being in public ownership, approximately a two percent reduction over current habitat acres (Table 4-4).

The retention and acquisition of land into RCAs would consolidate Tumamoc globeberry habitat on federal land and present better opportunities for managing and protecting the species. The BLM would also work with the USFWS to implement the Tumamoc Globeberry Recovery Plan.

The eight **Tumamoc globeberry** plants on 1,060 acres of occupied habitat slated for disposal probably would be destroyed by future development. These plants represent less than one percent of the protected population.

Even though land **exchanges** under the Proposed RMP would **reduce slightly** the total amount of federally protected suitable habitat for the Tumamoc globeberry, management of the species would improve because the BLM would be **able to protect the species on** consolidated blocks of habitat **more effectively**. It is likely that intensive management for the species on retained and acquired land would more than offset losses from **habitat disposal**.

Conclusion (Tumamoc Globeberry): Land tenure adjustments would result in about a two percent reduction in federally protected habitat but would consolidate public ownership of habitat with 40 of the 48 plants known on public land. Long-term protection within consolidated public land blocks is expected to outweigh short-term effects of **habitat disposal** and be beneficial to federal efforts to protect the species.

Nichol Turk's Head Cactus - *Echinocactus horizonthalonius* var. *nicholii* - Federally listed - Endangered. Under the Proposed RMP, the BLM would retain in federal ownership all 1,960 acres of the Turk's head cactus habitat which it currently administers in the RMP area. These acres plus 600 acres of state and 540 acres of private land identified for acquisition would be included in the 3,100-acre Waterman Mountain ACEC with specific management goals identified. Overall, the Proposed RMP would result in a 58 percent increase in the amount of Nichol Turk's head cactus habitat in public **ownership** (Table 4-4).

Acquisitions under the Proposed RMP would bring all known populations outside the Tohono O'Odham Reservation under federal protection. Some mineral development on existing claims would result in the loss of additional plants and habitat, but under the Proposed RMP, the long-term impacts of mining would be significantly reduced. Losses due to ORV activity would also be reduced.

Conclusion (Nichol Turk's Head Cactus): Land acquisitions would increase federally protected habitat by 58 percent. Protection measures under ACEC designation are expected to provide for recovery of the species.

Thornber Fishhook Cactus - *Mammillaria thornberi* - Federal Category 2 - Candidate. Under the Proposed RMP, the BLM would retain about 22,000 acres of suitable habitat on the west side of the Avra Valley, including known habitat for 50 plants, and acquire 12,000 acres of state land in suitable habitat. Overall, the Proposed RMP would result in a 13 percent increase in the amount of Thornber fishhook cactus habitat on public land.

The BLM would dispose of **300 acres** of habitat on the east side of the Avra Valley west of Tucson with **populations** of Thornber fishhook cactus. The **plants** of Thornber fishhook cactus on the BLM disposal tracts are likely to be destroyed by secondary impacts from development on adjacent private land. These plant losses would be balanced by the acquisition of other suitable habitat where opportunities for management of the species would be enhanced by blocking federal ownership, e.g., the Silver Bell Resource Conservation Area. **In addition, all public land parcels adjacent to the Tucson Mountains Unit of Saguaro National Monument would be retained under BLM administration. At least one of these parcels contains Thornber fishhook cactus.**

Conclusion (Thornber Fishhook Cactus): Consolidating federal ownership through land acquisitions would increase protected habitat by 13 percent under the Proposed RMP. Even with the loss of some known habitat through disposal, long-term benefits **to the species under the Proposed RMP** would be positive.

Sword Milkvetch - *Astragalus xiphoides* - Federal Category 1 - Candidate. Recent inventories have documented the occurrence of sword milkvetch on two BLM parcels not considered in the draft RMP/EIS. Additionally, the U.S. Park Service has reported some new localities for the plant within Petrified Forest National Park. Under the Proposed RMP, the BLM would retain two of the three known populations currently under its administration and would manage the parcels (1,280 acres) cooperatively with the U.S. Park Service. A tract of 280 isolated BLM acres near Holbrook with one small population is identified for disposal. All but three of the known sword milkvetch localities are currently under federal control. The three are on private land which is expected to be developed in the future.

Conclusion (Sword Milkvetch): Current information on the distribution and population size of sword milkvetch on federal lands indicates that implementing the Proposed RMP would contribute to conservation of the species by identifying all but one of the known localities administered by the BLM for retention. Protection of the species would be enhanced through cooperative management with the U.S. National Park Service.

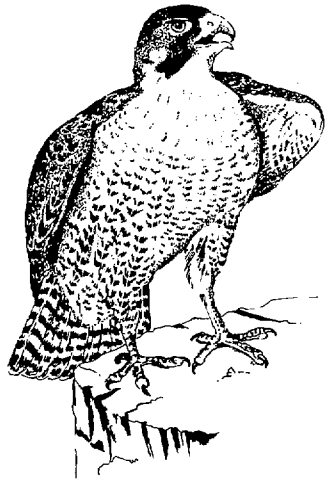
Paperspined Cactus - *Pediocactus papyracanthus* - Federal Category 2 - Candidate. Under the Proposed RMP, the BLM would dispose of all public land in Arizona with known or suitable habitat for the paperspined cactus.

Recent inventory of habitat in the RMP area indicates the species occurs in densities up to 900 plants per square mile over a range of 720 square miles. Land exchanges in the habitat area are not expected to result in a significant change from the current livestock grazing use. Although intensive grazing systems cause local declines in some populations, no widespread use of these systems is anticipated.

Conclusion (Paperspined Cactus): Implementing the Proposed RMP would not cause a significant decline of the species given the expected future land use and recent indications of the size and extent of the current populations.

EFFECTS ON WILDLIFE

Gila Topminnow - *Poeciliopsis occidentalis occidentalis* - Federally Endangered. Under the Proposed RMP, the Gila topminnow population in Tule Creek would be managed and monitored. It is assumed that the existing population would eventually be lost due to natural flooding within the Tule Creek drainage. Under the Proposed RMP, the fish would be restocked, however, thereby maintaining a successfully reproducing Gila topminnow population in the RMP area.



Gila topminnows would be introduced into five of six suitable sites to mitigate the 1981 loss of the natural population on public land in Cocio Wash. Eight of the recommended total of 20 introduction sites in Arizona are in the RMP area, but two are in disposal areas and one is in the Larry Canyon ACEC. The AG&FD and USFWS would not introduce fish onto public land that is expected to leave federal ownership. Management goals for Larry Canyon did not identify fish introductions. Acquiring land would benefit recovery efforts as the new land is likely to

contain additional sites suitable for reintroduction. However, the extent of this impact is unknown since the land has not yet been inventoried for reintroduction sites.

Conclusion (Gila Topminnow): Maintaining an existing population and reestablishing fish into five sites within their historic range would assist in the eventual recovery of the species.

Desert Pupfish - *Cyprinodon macularius* - Federally Endangered (also State-listed). Under the Proposed RMP, the Mesquite Spring population of pupfish would be managed and monitored. Pupfish would be introduced into three suitable sites in the RMP area, thereby increasing the total number of occupied sites in Arizona by 57 percent. The AG&FD and USFWS would not put fish into two sites on land proposed for disposal, preventing an additional 28 percent increase. However, acquisitions under the Proposed RMP are expected to offset this impact as it is likely that the acquired land will contain suitable reintroduction sites.

Conclusion (Desert Pupfish): The Mesquite Spring population would be managed and monitored and fish introduced into three suitable sites, thus increasing the occupied sites in Arizona by 57 percent. This, along with the acquisition of other suitable sites, will assist in delisting the species.

Little Colorado River Spinedace - *Lepidomeda vittata* - Federally Threatened. Under the Proposed RMP, 1.7 miles or 1.5 percent of the total Little Colorado River spinedace habitat would be removed from federal protection under the *Endangered Species Act*. Disposal of land would affect the fish only in Silver Creek and would not affect the species in the four other drainages which constitute its habitat. However, since all federal management would be eliminated from the Silver Creek drainage, the habitat **could eventually** be negatively impacted by **uncontested** upstream water removal **projects**. Dewatering of the Silver Creek drainage **would** eventually cause the loss of suitable spinedace habitat on the **disposal land**. The lack of federal management of spinedace habitat could contribute to the disappearance of the species from Silver Creek, one of the five major drainages inhabited by spinedace.

Conclusion (Little Colorado River Spinedace): About 1.5 percent of the total habitat (eight percent of the Silver Creek habitat) would be removed from federal protection under the *Endangered Species Act*. **A September 1988 opinion by the USFWS states that disposal of the Silver Creek habitat would not jeopardize the species.**

Desert Bighorn Sheep - *Ovis canadensis mexicana* - State-listed. Under the Proposed RMP, 39,200 **of the 39,330 acres** of public land in crucial desert bighorn sheep habitat would be retained and designated as a special management area to maintain the existing population of 50 to 60 desert bighorn. In addition, the BLM would pursue the acquisition of 11,400 acres of state land within the management area and manage them as crucial habitat. Overall, the land tenure adjustment would result in a **22 percent** increase in the amount of public land habitat for bighorn sheep in the RMP area (See Table 4-5). Also, 90 percent of the total crucial habitat in the RMP area would come under federal ownership and be actively managed for desert bighorn sheep.

TABLE 4-5
Wildlife Habitat Acreages
Bureau of Land Management, Phoenix District, Arizona

Species	Proposed RMP*	Under Current Management
Bighorn Sheep	50,600	39,330
Desert Tortoise	554,750	557,300
Pronghorn		
Sycamore Mesa	63,100	9,100
Apache-Navajo	0	216,200
Mule Deer	353,250	268,800
Javelina	583,650	526,000

*Acreages include BLM and state land recommended for acquisition.
Source: Arizona Game and Fish Department and Phoenix District files.

Vehicular use is expected to increase throughout the Silver Bell and West Silver Bell Mountains. ORV designations recommended under the Proposed RMP would prevent habitat damage to bighorn sheep areas and would prevent the animals from abandoning significant portions of the habitat. Closing 800 acres in the lambing area on Ragged Top to vehicular use would prevent impacts by ORVs and would reduce impacts from mining activities. Therefore, closure would greatly benefit bighorn populations by improving bighorn lambing conditions.

Under the Proposed RMP, there would be no new surface disturbance from major right-of-way development in crucial desert bighorn habitat because such development would be limited to existing corridors. Construction of such rights-of-way in the designated utility corridor along the western edge of crucial habitat would conflict with bighorn travel between crucial habitat and the Tohono O'Odham Reservation, but mitigating measures would keep conflicts to a minimum and maintain the travel corridor.

Designating Confidence Peak as a communication site would negatively impact bighorn use of 400 acres of habitat in the vicinity of the peak. One existing facility is accessed by a jeep trail. Construction, maintenance and use of communication facilities would create additional intrusions into bighorn habitat.

Prohibiting surface occupancy on oil and gas leases within 30,200 acres of crucial desert bighorn habitat would benefit bighorn by preventing habitat destruction and disruption of habitat use patterns.

Conclusion (Desert Bighorn Sheep): The existing population of 50 to 60 is expected to remain stable. The BLM's objective to maintain a viable population in the Silver Bell-West Silver Bell Mountains and to increase habitat capability would be met.

Desert Tortoise - *Gopherus agassizi*. Under the Proposed RMP, **377,200 acres** of **the 557,300** public land **acres currently** within the range of desert tortoise would be retained. In addition, the BLM would pursue the acquisition of **177,540 additional** acres **within this range**. Overall land tenure adjustments would result in BLM **management of 554,740** acres **within** desert tortoise range, **less than a one percent decrease in public land habitat** (See Table 4-5).

The BLM would retain **58,740 of the** 61,300 acres of tortoise habitat identified as important and acquire **22,032 additional** acres. Overall, the Proposed RMP would result in a 30 percent increase in the amount of known important tortoise habitat on public land in the RMP area. This important habitat in the Picacho Mountains, Silver Bell Mountains and the Donnelly Wash-Grayback area would be managed to maintain habitat capability. Such management would seek to ensure the viability of existing populations.

Identifying 7,980 acres of state land in the Picacho Mountains for acquisition, designating a special management area in the Picacho Mountains and **implementing** activity plan **actions** would result in the maintenance of existing populations in these important habitats.

The designation of two communication sites on two of the highest peaks in the Picacho Mountains is not expected to impact desert tortoise populations because tortoise generally inhabit the lower elevations and no roads would be constructed to access the sites.

Vehicular use is expected to increase throughout the range of the desert tortoise. Limiting vehicles to existing roads and trails would prevent habitat damage and tortoise injuries. However, impacts associated with existing roads would continue.

Approximately 32,200 acres (six percent) of desert tortoise range on public land is included in four CRMAs. Management plans for these areas would include actions to prevent and mitigate tortoise habitat disturbances. However, in these CRMAs, tortoise populations would be expected to exhibit a downward trend in localized developed areas or areas of high visitor use because of surface disturbances, disruption of home ranges, collection and vandalism.

Conclusion (Desert Tortoise): The BLM's objective of maintaining the capabilities of important habitat to support desert tortoise populations would be met through land acquisitions and special management.

Pronghorn - *Antilocapra americana*. The RMP area has two areas that support populations of pronghorn antelope, one on Sycamore Mesa east of Cordes Junction and the other in Apache and Navajo counties. On Sycamore Mesa, antelope inhabit about 78,000 acres of which about 12 percent (9,100 acres) is currently public land.

Under the Proposed RMP, all 9,100 acres of Sycamore Mesa and Perry Mesa habitat would be retained. In addition, the BLM would pursue the acquisition of 54,000 acres of habitat on state land. Overall land tenure adjustments would result in the BLM **administering 63,100** acres of pronghorn habitat, a 590 percent increase over the existing situation (See Table 4-5). Public and acquired pronghorn habitat would be managed to protect and improve habitat conditions and to facilitate pronghorn movement throughout their habitat. Active management of pronghorn habitat would result in a slight increase in pronghorn numbers.

Under the Proposed RMP, public land comprising 24 percent of a pronghorn travel corridor between Sycamore Mesa and Chino Valley would be disposed of through exchanges. The majority of this land would be developed under private ownership, which would greatly restrict pronghorn movement through the corridor. The loss of the travel corridor would contribute to the geographic isolation of the mesa and valley populations and subsequent loss of genetic diversity.

In Apache and Navajo counties, public land amounts to about seven percent of the two counties' total pronghorn habitat. Under the Proposed RMP, all public land pronghorn habitat would be disposed of. Two percent of this disposal land is near land which is currently being subdivided and is likely to be developed in the near future. As subdivisions become numerous and human occupants settle in, the land would lose its value as pronghorn habitat.

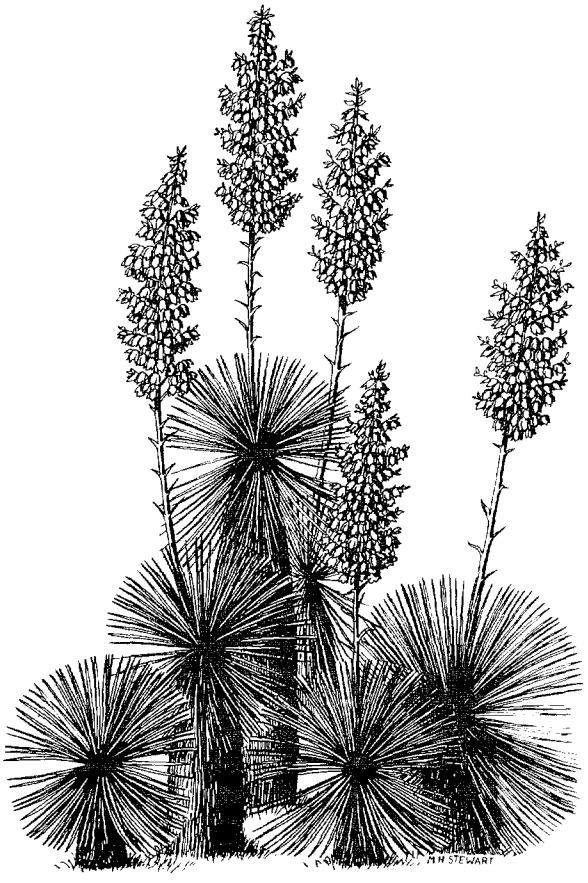
Conclusion (Pronghorn): Through land acquisitions, public land habitat on Sycamore Mesa would increase by 590 percent and be actively managed. Numbers would increase slightly even though restricted movement through the travel corridor would **be more restricted because of land disposal and subsequent new development in the area**. Two percent of the total habitat in Apache and Navajo counties would eventually be abandoned as a result of subdivision development, but the remaining land (five percent of the total) would continue to provide habitat.

Mule Deer - *Odocoileus hemionus*. Under the Proposed RMP, 182,000 acres of public land which supports medium to high density mule deer populations would be retained. In addition, the BLM would pursue the acquisition of 171,250 acres of such habitat. Overall land tenure adjustments under the Proposed RMP would result in the BLM **administering 353,250** acres of mule deer habitat **in the RMP area**, a 31 percent increase (See Table 4-5).

The majority of this public land is in the White Canyon RCA with the remainder in the Picacho Mountain and Black Canyon RCAs. The land is currently providing high value deer habitat and would be managed to ensure that it continues to provide important mule deer habitat.

Under the Proposed RMP, 93,000 acres of the public land in the RMP area that provides mule deer habitat would be disposed of through exchanges. More than half is in areas that are likely to be developed in the near future. The land would eventually support few or no deer.

Mule deer habitat would be managed under two updated HMPs (Black Canyon and Middle Gila) and one new HMP (Picacho Mountains). Management actions directed toward maintaining



Black Canyon, Lake Pleasant, White Canyon, Silver Bell and Picacho Mountains RCAs would be managed to ensure good condition javelina habitat. Acquired land would block up extensive areas in the four RCAs which would be managed to benefit javelina.

About one-third of the javelina habitat identified for disposal is in areas likely to be developed soon. Once the land begins to be developed, it would lose value as javelina habitat and would support lower densities. The javelina that do remain would eventually become nuisance animals on private land.

Javelina habitat would be managed under three updated HMPs (Black Canyon, Middle Gila and Silver Bell-Baboquivari) and one new HMP (Picacho Mountains). Public land would continue to support existing populations and javelina numbers would increase in areas where habitat improvements are instituted.

ORV designations limiting vehicles to existing roads and trails in the majority of the RMP area and closure of specific areas would prevent the loss of habitat and the harassment of javelina. ORV restrictions would contribute to the maintenance of important habitat.

Conclusion (Javelina): Public land supporting medium to high density populations would increase by 11 percent. Acquisition of state land in five RCAs would benefit by blocking up areas of important habitat and maintaining or improving habitat quality. The BLM's objective to increase habitat capability by four percent would be realized. ORV designations would prevent localized losses caused by heavy off-road vehicular use.

and improving mule deer habitat would be undertaken and mule deer numbers should increase in these areas.

ORV designations limiting vehicles to existing roads and trails in the majority of the RMP area and closing specific areas would prevent the loss of deer habitat and harassment of mule deer. ORV designation would prevent localized decreases in mule deer numbers caused by heavy off-road vehicular use.

Conclusion (Mule Deer): Land acquisitions would increase public land habitat supporting medium to high density populations by 31 percent and total habitat capability would increase by three percent because of ORV designations and improvements planned under updated HMPs.

Javelina - *Dicotyles tajacu*. Under the Proposed RMP, 453,000 of the 526,000 acres of public land **currently** supporting medium to high density javelina populations would be retained. In addition, the BLM would **attempt to** acquire **130,650** acres of such habitat. Overall land tenure adjustments under the Proposed RMP would result in an 11 percent increase in public land javelina habitat in the RMP area.

EFFECTS ON WILD, FREE-ROAMING BURROS

Under the Proposed RMP, 80,800 acres of historic burro habitat in the proposed Lake Pleasant Resource Conservation Area would be designated a special management area (SMA) for burros. The SMA would include current public land and land identified for acquisition. Including acquired land, the public land used by burros would increase by three percent. The designation of the burro herd SMA and subsequent implementation of a herd management area plan would provide for a base herd of 80 burros.

The proposed increase in burro densities to about one animal per 1,000 acres would increase breeding interaction and would halt the current population decline. ORV restrictions proposed under this alternative would benefit burros by reducing the opportunities for harassment of burros in remote, roadless areas.

Conclusion (Wild, Free-Roaming Burros): A three percent increase in public land for use by burros, the reduction in harassment incidents through ORV restrictions and an activity plan detailing other protection measures would allow for the maintenance of an 80-animal herd without negatively impacting vegetation.

EFFECTS ON RECREATION USE

Under the Proposed RMP, existing opportunities for unstructured and dispersed recreation activities would be maintained (Table 4-6). Additional efforts would be made to enhance these opportunities or contribute to the development of new activities or recreation facilities through R&PPA leases, CRMAs and BLM-managed recreation areas.

Five R&PP leases totaling **2,830 acres** would be issued. Urban-based recreation opportunities would benefit from this action because the availability of low cost federal land would enable state and local governments to build and expand parks, recreation sites and wildlife protection areas. The areas would satisfy the needs of local governments to provide developed and intensively managed visitor facilities accessible to expanding metropolitan areas.

Five cooperative recreation management areas (CRMAs) **totalling 33,900 acres** would be managed cooperatively with local governments for intensive recreation purposes--**23,600 of these acres are outside the identified RCA boundaries**. These CRMAs would greatly enhance recreation opportunities in the RMP area by making large blocks of land near major metropolitan areas available for various open space recreation pursuits. Through a series of land exchanges, the BLM would work to consolidate public ownership within and would cooperatively manage with local governments the Lake Pleasant, Black Canyon Trail, San Tan Mountains, Tortolita Mountains and Sawtooth Mountains CRMAs.

The establishment of seven resource conservation areas (RCAs) would provide extensive areas of public land for dispersed, unstructured recreation activities. Limiting ORVs to existing roads and trails would prevent surface disturbance in these RCAs and protect the visual and scenic qualities of each area.

Legal access routes would be acquired into the Sawtooth, Picacho, Coyote and Baboquivari mountains. Recreationists would **be assured of future access to these areas through private land parcels**.

The BLM would play a major role in the development of Maricopa County's Lake Pleasant Regional Park by entering into a management agreement with Maricopa County for managing the park, with development centered on public land. Through this agreement, the BLM can offer a wide variety of water-based recreation opportunities not presently available on Phoenix District public land. The BLM and Maricopa County will manage the public land within the expanded park boundaries. The Lake Pleasant master plan calls for a new lodge, two marinas, restaurants, campgrounds, roads, trails and a primitive area. A new paved highway across public land into the park from State Highway 74 was dedicated on August 26, 1987.

Visitor use of the park and surrounding BLM-managed public land **would** rise **considerably** as the lake fills and new facilities are developed.

Existing dispersed recreation opportunities on public land outside the regional park would be maintained or enhanced by establishment of the Lake Pleasant RCA.

Open space recreation opportunities would be greatly expanded by the establishment of the Hells Canyon Recreation Management Area and by blocking up public land in the RCA. Hiking, backpacking, plant and wildlife sightseeing and camping would increase. ORV and all-terrain vehicle use (confined to existing roads and trails) would also increase.

TABLE 4-6

Projected Long-Term Recreation Visits Per Year
Bureau of Land Management, Phoenix District, Arizona

Use Areas	Motorized Travel	Camping	Fishing	Hunting	Other	Totals
Baboquivari/ Coyote Mtns.	100	800	0	200	1,300	2,400
Silver Bell/ Sawtooth Mtns.	17,100	6,000	0	14,000	28,000	65,100
Picacho Mtns./ Reservoir	200	250	0	300	500	1,250
Gila River Canyons	13,660	3,000	400	17,400	23,000	57,460
Black Canyon Area	9,275	3,000	0	1,000	11,800	25,075
Lake Pleasant Region	402,400	300,000	400,000	35,300	62,000	1,200,000
Scattered tracts	450	50	0	175	420	1,095
TOTALS	442,485	313,100	400,400	68,375	127,020	1,352,380

Source: Phoenix District files.
Recreation Management Information System Data.

Under **the Proposed RMP**, the Black Canyon RCA would provide improved unstructured and diverse recreation opportunities. Visitor use levels would increase in all recreation types because of population growth and the increased availability of public land, but the greatest increase (about 100 percent) is anticipated in hiking, backpacking, backcountry camping and equestrian use. The establishment, marking and signing of the 60-mile Black Canyon Hiking and Equestrian Trail (CRMA-BLM and Maricopa/Yavapai counties) would be the major contributor in the growth in nonmotorized activities.

The Gila River canyons would continue to provide unstructured and undeveloped dispersed recreation opportunities. The types and patterns of most recreation use, except nonmotorized, would remain similar to that of the present, with visitor use gains averaging 28 percent. Nonmotorized travel would experience the greatest visitor use gains (70 percent) because the Trans-Arizona Trail crosses the area and because of the popularity of White and Walnut canyons to hikers. Outstanding scenic, wildlife, riparian and cultural values would attract hikers and permit nature study and observation.

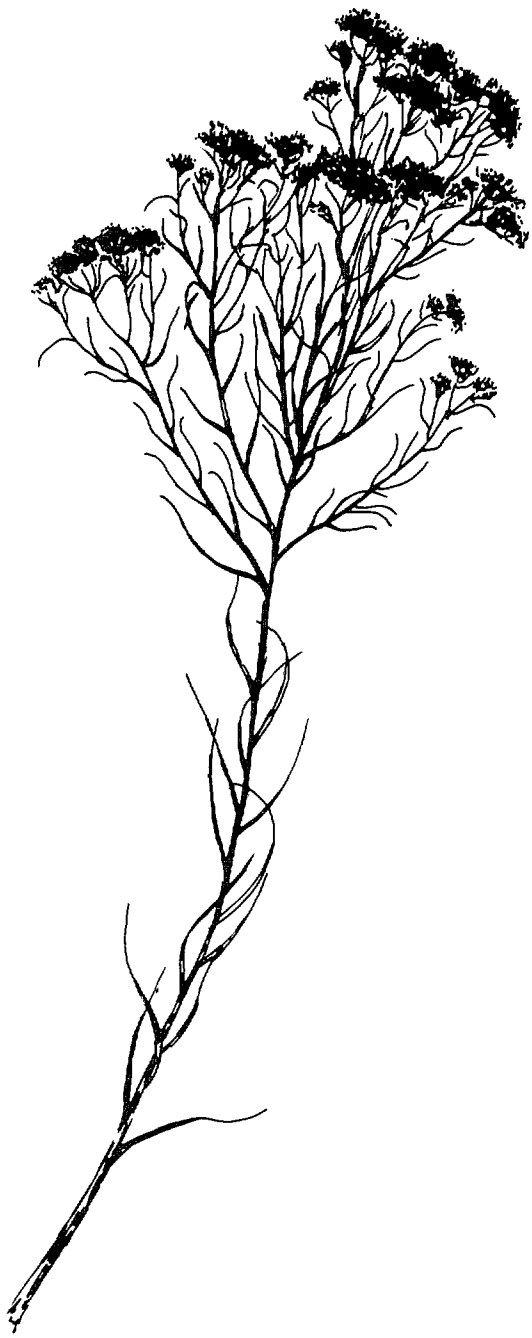
Cross-country ORV use would be limited to existing roads and trails in the area, but ORV use levels would still increase as there are numerous trails and roads available to pursue those activities.

The Picacho Mountains would continue to provide unstructured and dispersed recreation opportunities under **the Proposed RMP**. About 75 percent of existing ORV opportunities would be lost, however, with the disposal of the northern portion of the Picacho Range. The quality of backcountry or primitive recreation experiences would decline somewhat because of additional microwave communication site development on Newman Peak. Improved legal access would increase hunting, sightseeing, camping, hiking and wildlife observation opportunities. The area would remain an excellent setting to observe desert tortoise and deer populations.

The area comprising the Sawtooth Mountains and Silver Bell Mountain complex would provide both developed and undeveloped dispersed types of recreation opportunities. The quality of those opportunities would increase because of managed visitor use, including ORV designations and establishment of several special management areas. The Sawtooth Mountains would be developed as a CRMA, enhancing recreation opportunities in the area.

The types and patterns of recreation use would remain similar to present ones except in the Sawtooth Mountains. Additional residential development in the Altar Valley and nearby retirement communities would increase visitor use levels by an average of 37 percent, with the greatest gains in ORV and other motorized use. Hunting levels would remain static due to unchanged small game and deer populations.

In the Coyote and Baboquivari mountains, the types, patterns and level of visitor use, except motorized, would triple over the long term as legal access is provided to these public land areas. Outstanding rockclimbing, hiking, primitive camping, wildlife observation, sightseeing and backcountry experiences would be maintained. Reliable access would increase hunting in the eastern canyons of the Coyote Mountains.



Scattered Tracts. The sale, exchange and disposal of many scattered tracts of BLM land under this alternative would cause a loss of 88 percent of existing recreation opportunities associated with this land.

Conclusion (Recreation): Consolidated public ownership of land in seven RCAs would provide expanded open space recreation opportunities near major metropolitan centers. Five CRMAs would allow development of intensively managed recreation areas and five R&PP leases would significantly improve local governments' ability to provide urban-oriented recreation facilities.

Mitigating Measures

No specific mitigation measures have been identified in this RMP/EIS that would reduce the impacts of implementing the Proposed RMP. Mitigation is deemed necessary when the BLM begins implementing actions identified in the approved RMP/EIS. At that time, an environmental assessment identifying the environmental impacts of each activity plan will be developed and specific mitigation measures will be incorporated into the assessment to lessen those impacts. Therefore, mitigation measures will be incorporated on a site-specific basis as this RMP is implemented.

Unavoidable Adverse Impacts

No mitigation measures have been identified to lessen the adverse impacts of implementing the Proposed RMP. When the BLM begins implementing the plan, site-specific mitigation will be developed to mitigate the impacts identified during the environmental assessment process. At this time, all adverse impacts identified in this RMP/EIS are considered unavoidable.

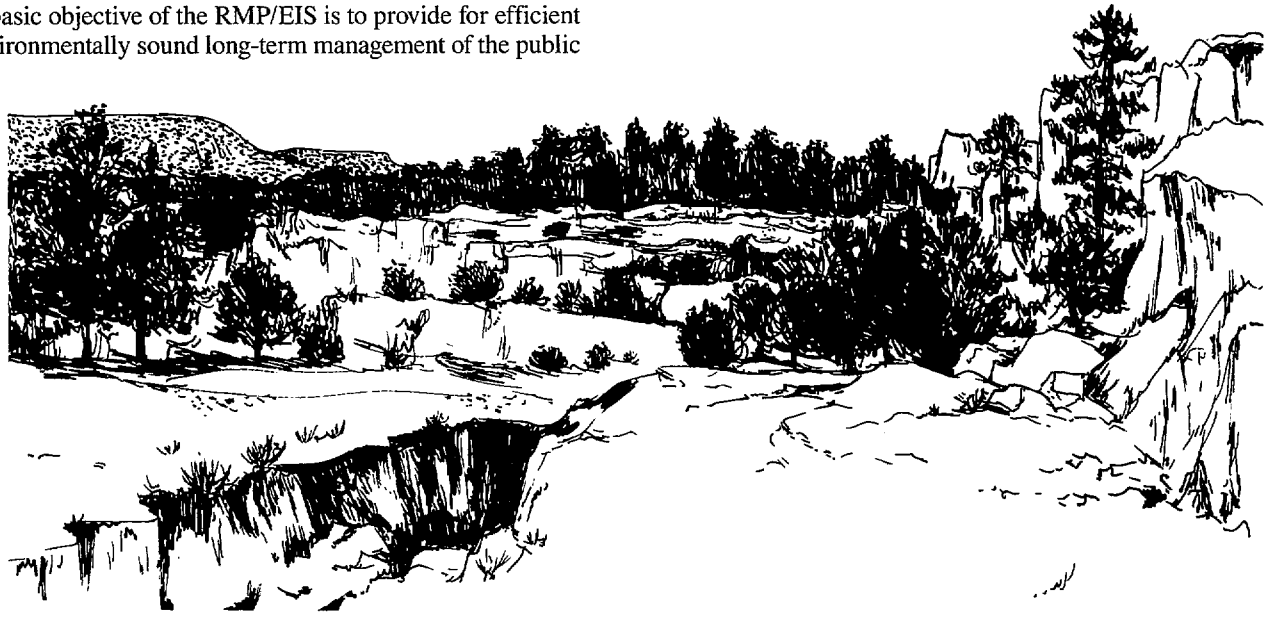
Short-Term Use Versus Long-Term Productivity

The basic objective of the RMP/EIS is to provide for efficient and environmentally sound long-term management of the public land and resources in the Phoenix RMP area. To accomplish this objective, it is anticipated that the BLM will dispose of some land containing resource values that would be better protected under federal ownership. However, the benefits of achieving the long-term objectives of this plan outweigh the short-term loss of some resource values that would occur as the plan is implemented.

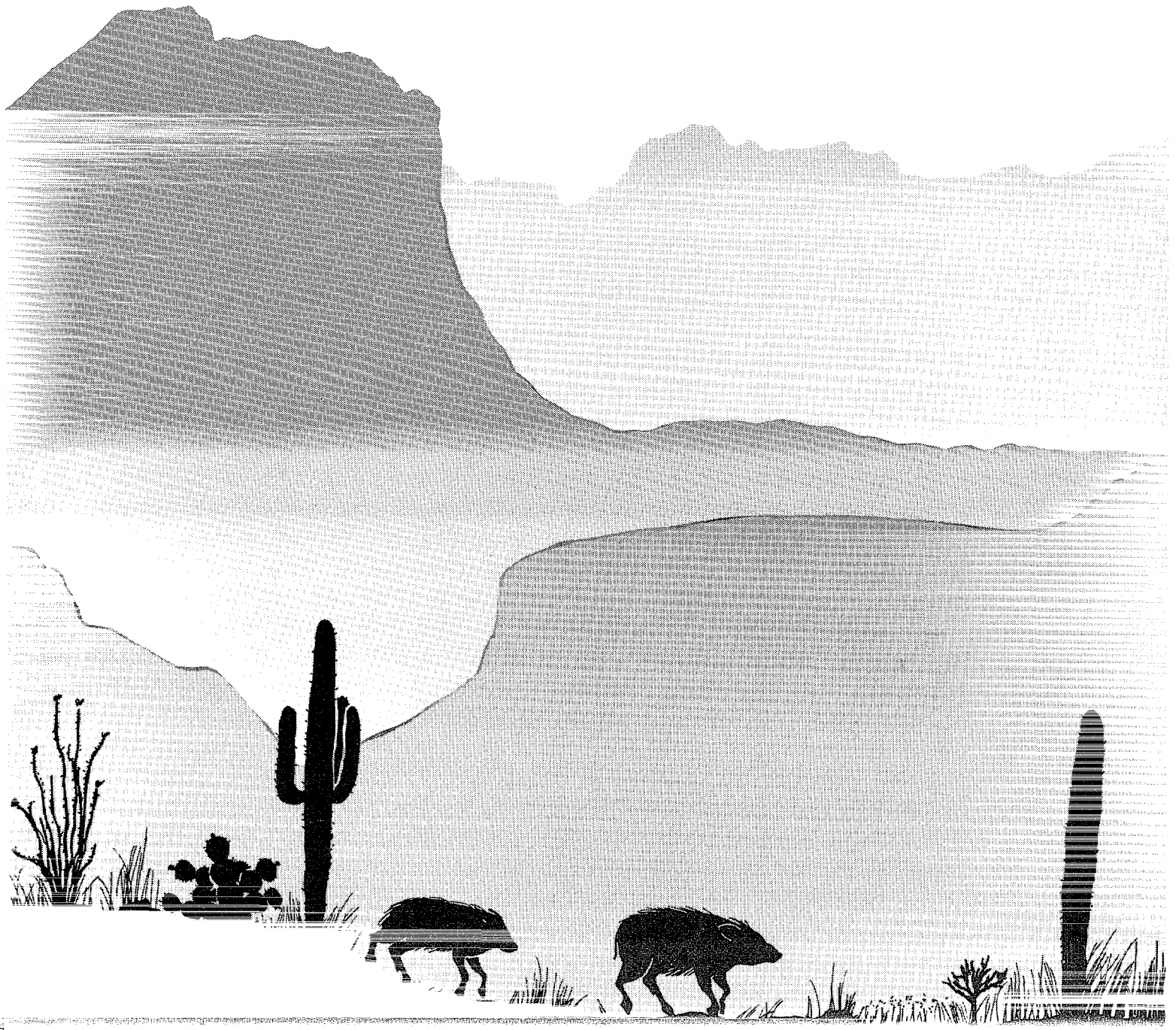
The land tenure adjustment program identified in the RMP/EIS has many such short-term tradeoffs. Scattered public land that provides limited recreation opportunities would be exchanged for large blocks that would provide extensive recreation opportunities near large population centers. Land identified for disposal may contain one or more resource values that would benefit from federal protection; however, through the disposal of these tracts, the BLM **would acquire land and consolidate ownership in areas containing, in most instances, resource values in greater abundance than those present on the disposal parcels. Therefore, over the short term land disposals may negatively impact some resources, but over the long term many would be greatly benefited**.

Irreversible And Irretrievable Commitments Of Resources

It is assumed that effects (impacts) to resources from implementing the Proposed RMP would be both irreversible and irretrievable over the long term (five to 20 years). A discussion of both direct (immediate) and indirect (future) effects of implementing the Proposed RMP is included in the environmental consequences narrative in Chapter 4 of this document. The consequences of implementing the other alternatives studied are summarized in Table S-1 of the draft RMP/EIS.



CONSULTATION AND COORDINATION 5



CHAPTER 5

CONSULTATION AND COORDINATION

Introduction

This *Phoenix Resource Management Plan/Environmental Impact Statement* (RMP/EIS) is being prepared by specialists from the Phoenix District Office and the Phoenix Resource Area. The Arizona State Office planning staff and resource specialists provide technical reviews and suggestions. Developing this RMP/EIS began in 1986.

LIST OF PREPARERS

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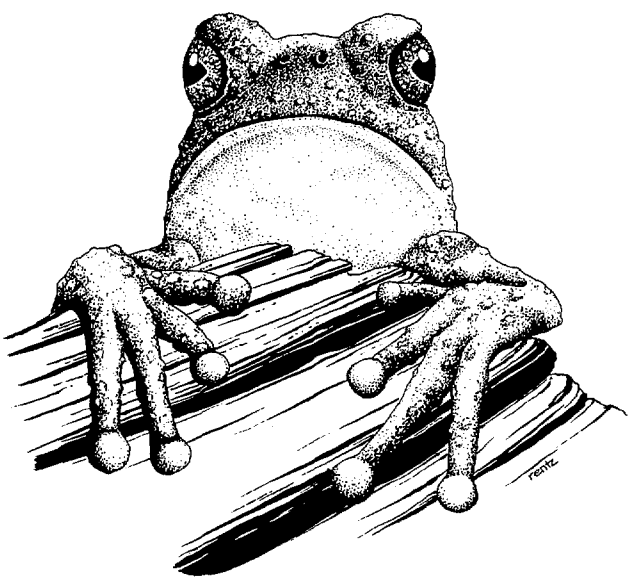

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ARTWORK AND GRAPHICS

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Myrna Fink
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The following people from the BLM's Arizona State Office provided technical assistance and review for this RMP/EIS.

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Beaumont C. McClure, Deputy State Director, Land and Renewable Resources

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Eugene Dahlem, Wildlife Biologist
Daniel J. McGlothlin, Hydrologist
Keith L. Pearson, Planning and Environmental Coordinator
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Gary D. Stumpf, Archaeologist
Larry D. Taddia, Supervisory Cartographic Technician
Bruce B. Talbot, Outdoor Recreation Planner
Marvin E. Weiss, Natural Resource Specialist

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Arthur E. Tower, Phoenix Resource Area Manager

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Theodore E. Cordery, Wildlife Biologist
Karen Daniels, Computer Specialist
Kenneth R. Drew, Assistant District Manager, Operations
Robert D. Mitchell, Range Conservationist
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Richard Thomas, Public Affairs Specialist

SCOPING (Issue Identification)

Scoping served to identify the significant issues to be analyzed in the RMP/EIS and de-emphasized or eliminated from detailed study insignificant issues or issues addressed in earlier environmental reviews. The significant environmental issues were then incorporated into a range of alternatives, and the effects or impacts of implementing the alternatives were analyzed in this RMP/EIS.

The BLM held several public scoping meetings to help identify public concerns about issues. Based on professional judgment, BLM resource specialists also identified issues. A review of all issues by resource managers and an interdisciplinary team concluded the scoping process.

The scoping process for this RMP/EIS involved several phases, extending from February 1986 to April 1988.

PUBLIC INVOLVEMENT AND CONSULTATION DURING DEVELOPMENT OF THE RMP/EIS

An active public participation program was conducted from the start of the planning process for this document. The following section highlights the public participation opportunities available during the RMP's development.

January 1986
Federal Register notice, press release and public mailing (900 individuals and groups) announcing the beginning of the Phoenix RMP/EIS and inviting public participation on issue identification.

February 1986
Public meetings held in Tucson, Phoenix, Holbrook and St. Johns to solicit comments on planning issues.

May 1986
Issue newsletter (900 recipients) with issue identification results.

March through September 1986
Interest group scoping meetings included environmental groups, special interest public land users, city, county, state and federal government officials and Indian tribal councils.

November 1986
Issue newsletter (900 recipients) to solicit comments on preliminary alternatives.

December 1986
Public meetings in Tucson, Phoenix, Holbrook and St. Johns to solicit comments on alternatives.

January through July 1987
Continue meetings with interest groups and individuals to discuss alternatives.

July 1987
Issue newsletter describing final list of alternatives chosen for study in the RMP/EIS.

January 1988
Publish draft RMP/EIS and begin 90-day public comment period.

February 1988
Public hearings in Tucson and Phoenix to solicit comments on the draft RMP/EIS.

December 1988
Publish Proposed RMP and Final EIS.

LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THIS STATEMENT WILL BE SENT

Because of the size of the mailing list (900), only a partial list of those who will receive the document follows.

Federal Agencies

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

Arizona State Agencies

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

Local Agencies

Central Arizona Association of Governments
City of Casa Grande
City of Eloy
City of Phoenix
City of Superior
City of Tucson
Gila County Planning and Zoning Department
Maricopa County Association of Governments
Maricopa County Board of Supervisors
Maricopa County Parks Department
Maricopa County Planning and Zoning Commission
Mohave County Board of Supervisors
Mohave County Planning and Zoning Commission
Northern Arizona Council of Governments
Pima County Association of Governments
Pima County Board of Supervisors
Pima County Parks and Recreation Department
Pima County Planning and Zoning Department
Pinal County Board of Supervisors
Pinal County Planning and Zoning Department
Yavapai County Board of Supervisors
Yavapai County Planning and Zoning Department

Indian Tribes and Councils

Ak-Chin Indian Community
Fort McDowell Mohave-Apache Community Council
Gila River Indian Community
Hopi Tribal Council
Navajo Tribal Council
Pascua Yaqui Tribal Council
Salt River Pima-Maricopa Community Council
Tohono O'Odham Council
Yavapai-Apache Community Council
Yavapai-Prescott Board of Directors

Interest Groups

Arizona Cattle Growers Association
Arizona Desert Bighorn Sheep Society
Arizona Mining Association
Arizona Mining and Prospecting Association
Arizona Nature Conservancy
Arizona Outdoor Coalition
Arizona Prospectors and Small Mine Operators Association
Arizona Public Service
Arizona State Association of Four-Wheel-Drive Clubs, Incorporated
Arizona Wildlife Federation
Audubon Society
Bureau of Land Management Advisory Board
Defenders of Wildlife
Desert Tortoise Council
International Society for the Protection of Mustangs and Burros
Kingman Grazing Advisory Board
League of Women Voters
National Audubon Society
Natural Resources Defense Council, Incorporated
New Mexico and Arizona Land and Cattle Company
News Media
Oil and Gas Companies
ORV Clubs
Phoenix District Advisory Council
Phoenix-Lower Gila Resource Area Grazing Advisory Board
Public Lands Council
Rockhound Clubs
Santa Fe Minerals
Sierra Club, Grand Canyon Chapter
Sierra Club, Rincon Chapter
Sierra Club, Southwest Office
United Four-Wheel-Drive Association
Wild Burro Protection Association
The Wilderness Society
Wildlife Society
Yuma Audubon Society

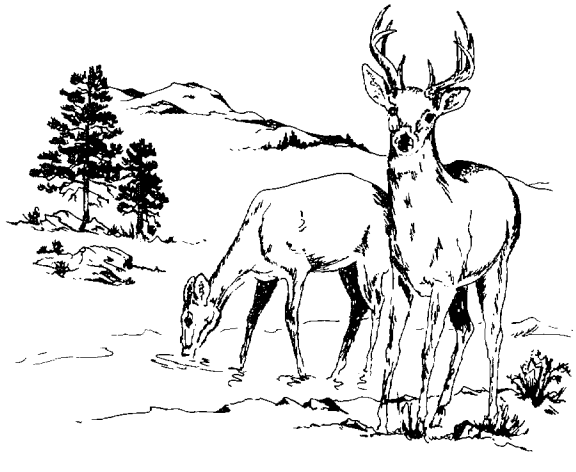
Elected Representatives

FEDERAL

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

STATE

Governor Rose Mofford
Speaker of the House
President of the Senate



Public Comments On The Draft RMP/EIS

The results of public comments on the draft RMP/EIS are separated into three sections: 1) BLM's general response to public comments 2) public hearing transcripts 3) public comment letters and BLM's specific responses.

BLM's General Response to Comments

Planning Process: This response is designed to clarify the differences between the various levels in the BLM planning process. Detailed information is available in the Planning Regulations (43 CFR 1600) and the BLM Planning Manual (Sections 1600 through 1630).

The planning system incorporates three tiers: the most general is the policy tier that identifies goals, objectives, priorities, alternatives and other factors for use in planning. Illustrative of this is the Arizona State Director Policy for Resource Management Planning that directs the initiation and development of resource management plans throughout the state.

The Resource Management Plan (RMP) is a second tier. This general document outlines planning goals and actions for multiple use management of the public lands in a district or resource area. The RMP establishes the combinations of land and resource uses; related levels of investment and production and/or protection to be maintained; and general management practices and constraints for the various public land resources covered by the plan. These are set forth as the terms, conditions and decisions that apply to BLM management activities and operations and are presented in the form of multiple-use prescriptions and plan elements.

Plan conclusions must reflect *Federal Land Policy and Management Act* (FLPMA) principles for planning and multiple use objectives (PL 94-579, Title II, Section 202.). Alternative solutions for major competitive situations, trade-offs, environmental consequences and other effects are always considered in the formulation of plan alternatives. The RMP is not a final implementation decision on actions which require further specific plans, process steps or decisions under specific provisions of law and regulations.

The third tier of planning (the activity plan) shows in detail how to carry out the particular uses provided for in the RMP tier. Activity plans are generally resource program specific; however, they may involve more than one resource program. For example, this RMP/EIS document lists the development of activity plans as as a management action for implementation of the RMP. The activity plans for these areas would detail, specifically, how management goals would be carried out, a schedule for implementation, and budget requirements.

Upon approval of the RMP in a Record of Decision (ROD), some actions may be immediately implemented. Implementation of most specific actions, however, depends on the completion of environmental assessments and compliance with all applicable laws.

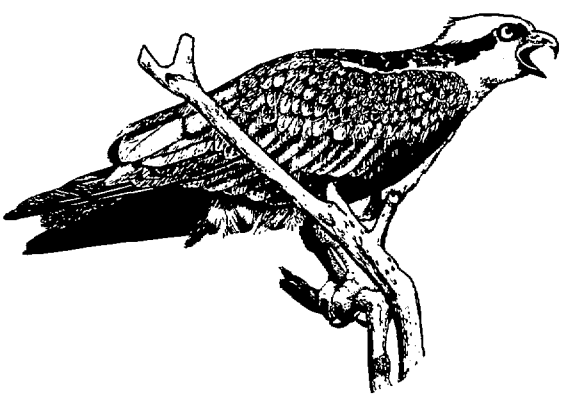
Section 7 Consultation: Section 7 of the *Endangered Species Act of 1973*, as amended (ESA), requires every federal agency, in consultation with the U.S. Fish and Wildlife Service, to ensure that any action it authorizes, funds or carries out is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. Further, Section 7 requires federal agencies to confer with the Secretary on any action which is likely to jeopardize the continued existence of proposed species or result in the destruction or adverse modification of proposed critical habitat.

Pursuant to an understanding with the USFWS during informal consultation in October 1987, this Proposed RMP/FEIS has been submitted to the USFWS for consultation under Section 7 of the ESA.

Management Guidance: Several public comments expressed concern that proposals in the RMP would conflict with the BLM's policies for wildlife management. Proposals which identify federal candidate species habitat or riparian areas for possible disposal were of particular concern. Guidelines for management and planning of candidate wildlife habitat and riparian areas, as expressed in IM-WO-87-684, Executive Orders 11988 and 11990 and the *BLM Planning Regulations*, do not automatically prohibit disposal of candidate species habitat or riparian areas.

As stated at several points in the draft RMP/EIS and this Proposed RMP/FEIS, a decision to dispose of public land is based upon the results of environmental assessments for every disposal action. The importance of the habitat or area with regard to its overall abundance and distribution, the importance of federal management in its overall survival, the foreseeable uses of the habitat or area in non-public ownership and the differences between feasible federal and non-federal protection for the habitat or area are some of the factors (considered during the environmental assessment process) which would influence a final federal management decision to dispose of or retain the land.

BLM must select the best overall multiple use plan for each area. Therefore, management cannot exclude from disposal any land because — and only because — the land is candidate species habitat or riparian area. The disposal of land does not occur without the acquisition of land. As stated in the draft and proposed RMPs, the BLM's goal is to acquire values equal to or greater than those on disposal land, and only if environmental assessments indicate disposal would be an option.



U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

PHOENIX DISTRICT * ARIZONA

REPORTER'S TRANSCRIPT OF PROCEEDINGS
PHOENIX RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

Phoenix, Arizona
February 25, 1988

BY: KATHY H. GRAVELLE

Prepared for:

BLM

(Original)

REPORTER'S TRANSCRIPT OF PROCEEDINGS was taken on the 25th day of February, 1988, commencing at 7:00 p.m., at the Embassy Suites Hotel, Lavista Room, 3210 Northwest Grand Avenue, Phoenix, Arizona, before Hearing Officer, Mr. Larry Bauer.

Also present were Land Use Planner, Mr. Tim Sanders; Phoenix Resource Area Director, Mr. Arthur E. Tower; Phoenix District Manager, Mr. Henri Bisson.

The following proceedings were held.

--oOo--

MR. SANDERS: It's 7:00. I appreciate everybody showing up tonight. We are very much interested in your comments on the Phoenix Resource Management Plan, and I guess I would like to stress that's primarily what our job tonight is: To listen to you, listen to what you have to say concerning the management plan that we have outlined for public comment.

By design, this gathering tonight is a public hearing, and it's sandwiched in between our 90-day Environmental Impact Statement.

We do have a court reporter present, and she will prepare a transcript of whatever is said tonight while the hearing is in progress. And we have a podium down here for speakers to come down and speak and let us know what you think about the Phoenix Resource Management Plan.

Larry Bauer, on my left, is the Hearing Officer, and he will have a short introduction to make and, then, we will go into listening to the speakers and recording those speakers.

Following the opening and closing of the hearing, we will have a question-and-answer session, and we will be glad to answer any

questions you have about the Phoenix Resource Management Plan. After that, we will be glad to talk to anybody who wants to, one-on-one.

With that introduction, I would like to turn the meeting over to our Hearing Officer, Larry Bauer.

MR. BAUER: Ladies and gentlemen, this public hearing bill will now come to order.

I would like to introduce myself. My name is Larry Bauer, and I'm the Deputy State Director for managers at the BLM office on 7th Street in Phoenix. I have been appointed Arizona state director by Mr. Dean Bibles to conduct this public hearing under the authorities of the Secretary of The Interior.

This hearing concerns the Phoenix Resource Management Plan/Environmental Impact Statement in the BLM Phoenix Resource Area.

Most of you, undoubtedly, signed the attendance sheet as you came into the room. If you have not done so, I would encourage you to sign in so that we can have a written attendance for the record here.

If you plan to make a statement this evening, please be sure to select the appropriate

space on the attendance sheet or give your name to us so we can call on you.

This hearing will be recorded by a court reporter, who will prepare a transcript of everything that is said this evening. If you wish to obtain a copy of the transcript, you should make arrangements through Henry Hisson, who is the Phoenix District Manager or Art Tower, the Phoenix Resource Area Manager, or Mr. Tim Sanders who is the team leader for the Phoenix Resource Area, RMP/EIS. At this time, I would like to say a few words about the Phoenix Resource Management Plan.

Our management plans four alternatives for management of the 911,000 acres of public lands and in BLMs Phoenix Resource Area. The land in question lies in eight counties: The counties of Apache, Navajo, Maricopa, Yavapai, Pinal, Pima, Gila and Santa Cruz. The plan identifies as one of the alternatives, a BLM-preferred alternative. This alternative is BLMs long-range plan for the area of the plan and discusses such things as land exchanges, utility corridors, communication sites and the designation of areas of critical environmental

concern. In addition, the plan identifies a long-range program for managing the planning areas for recreational resources.

At the front of the room, we have placed several plans which show the BLM-preferred plan. At the end of this hearing, the BLM representative will be able to discuss any questions or aspects of the plan in which you may be interested. Now, for a few words about the procedures to be used during this hearing.

This hearing is not a debate or a trial or a question-and-answer session. This advisory hearing and all interested persons present may make statements, either written or oral or both, that are pertinent to the Resource Management Plan we are covering tonight. Your oral comments will be recorded and a transcript of your comments will appear in the Environmental Impact Statement. You may also obtain these in the hearing record. Written comments should be addressed to Arthur E. Tower, Bureau of Land Management, Phoenix District Office, 2015 West Deer Valley Road, Phoenix, Arizona, 85027. This address is also included in the Draft Environmental Impact Statement, and we have

copies of that impact statement available tonight, if you do not already have one. I would also like to take a minute to discuss where the plan goes from here.

As we stated earlier, we are in the middle of a 90-day public comment period on the Draft RMP/EIS. After the comments period closes on April the 29th, we will review all comments and choose a final plan later this year. We will issue a final Environmental Impact Statement that includes a BLM-proposed resource management plan. 30 days after we issue the final environmental impact statement, we will begin to implement the proposed plan.

With that introduction, we will now begin this hearing.

Are there any governmental officials here tonight who wish to make a statement?. If not, Arthur, would you bring the list over so we can call the people in order that they came in?

Our first speaker tonight is Mr. R.H. Johnson. At the beginning, I will tell you, you have up to 10 minutes to speak, and I will indicate when you have two minutes on that time left, if you have not finished. Then, we will go

ahead onto the next speaker.

MR. JOHNSON: I'm R.H. Johnson.

MR. BAUER: Please step up to our microphone, here.

MR. JOHNSON: I own the Desert Hills Ranch Morristown, Arizona, 72 sections. Under this proposal, eight sections of that ranch are being considered as a trade to developers. If this trade takes place, it will effectively amount to eight sections of Arizona trade of state lands that will be technically landlocked that we will not have access to. In this eight acres, there is one of our wells and corrals and some of the best grazing lands on the ranch.

This effectively will reduce the size of the ranch by 12-and-a-half percent. We have previously, as of December the 28th, 1987, prepared our options in writing to Mr. Bisson. I would like to have that letter go into the record or if not, we will be glad to update it and present it again.

You have the letter. Should I re-send it or will it be satisfactory as written?

MR. BAUER: Henri, would you answer that?

MR. BISSON: That's fine.

MR. BAUER: Okay.

MR. JOHNSON: That will become a part of the record?

MR. BISSON: Yes, sir.

MR. BAUER: Thank you, very much, Mr. Johnson.

The second speaker is Allen Klinefelter.

MR. KLINEFELTER: Yes, sir. I'm Allen Klinefelter and I'm R.H. Johnson's cattle partner.

Mr. Johnson owns Desert Hills Ranch. Some of you might be familiar with it. As you go from Phoenix to Wickenberg, you overpass Morristown and you turn right at Castle Hot Springs Road. As you cross 74 Highway, going east to Lake Pleasant, when you cross that cattle ford for the next 10 miles you are going through the middle of us.

It's comprised of about 75 sections, two adverse sections, Arizona Lands, 56 percent; BLM, 44 percent. And in the southeast corner there are ranches. There are 59 sections that are affected by this impact statement, eight sections BLM wishes to take off the ranch and

sell, give, trade, whatever, to individuals. But the very southeast section of the ranch is in an Arizona Land Lease section and because it's three sections squared, nine sections, it would effectively cut that section out of the ranch. We couldn't reach it.

There is 30 acres of Arizona lands that comes directly north from Whitman and crosses and comes on to us. There is a 4-wheel drive club that has a lease within our ranch boundaries and that would be landlocked by this trade.

If you go on north from there, it's a 40-acre Arizona Land Lease with English Wells Windmill, wells, and corrals that would be cut off from the ranch. That is the primary water source. As you probably know, we try to have a water source and have the cattle work out in a radius of one mile in each direction. If two miles, the cattle going that far will get foot sores. It now leaves the ranch in the middle of four miles.

Not only will this effectively take off the ranches nine sections, it also will foul up our fencing plans, which has been removed by BLM of Arizona.

Now, I would like to read this letter, just because it covers the points. And also, cow punchers don't always look like this, and the time we should have been cleaning up somebody said we have a cow out trapped that we had to help.

Henri Bisson, December 28th. Dear Sir: We, Johnson-Klinefelter; Desert Hills Ranch, little h, slash, in parentheses, request and strongly recommend that Bureau of Land Management disapprove, underline, the proposed land trade with developers of eight sections in Township 6 north, Range 2 west, set forth in your attached letter, for the following reasons:

1. This action would cut off from the ranch, Arizona Land Department Graze lease lands in Section 16, Township 6 north, Range 2 west.

2. English Wells Windmill, well and corrals, the only stock and game water source for the Southeast quarter of the ranch, would be lost.

3. BLM 4,878.43 acres of little h, slash, plus Arizona Land Department 640 acres in Section 16, Township 6 north, Range 2 west would be lost, making the cow-calf range operation no

longer economically feasible.

4. Johnson's investment of approximately $5,000 per graze lease section would be lost, plus loss of improvements.

5. Two years' work on approved modified Savory Range Management System by Arizona Land Department Bill O'Sullivan and Bureau of Land Management Range Specialist Loyal Haun would be lost as loss of eight graze sections of BLM lease and one graze section of Arizona Land Department to developers, or by cutting off from ranch and water, would make cost of fencing, posts, labor, surveying, pioneering of fence lines, cattle guards and gates no longer economically feasible for shrunken cattle operations.

6. Johnson-Klinefelter, who have owned and operated Desert Hills Ranch under h, slash, brand for the past five years, have always held cattle numbers on ranch below assigned animal unit permit numbers allowed by Bureau of Land Management, 44 percent, and Arizona Land Department, 56 percent, to allow for range forbs and grasses reseeding and regrowth for stock and game feed, have always paid assessed graze fees and taxes ahead of schedule and have cooperated

in full with any BLM and Arizona Land endeavors to improve range conditions.

7. Johnson-Klinefelter Desert Hills Ranch is one of the few remaining ranches in this area dedicated to a cow-calf operation to produce yearling calves for sale to finishing feed lots to be sold to area meat packers for beef for rapidly increasing population. Most other ranches in this area have changed to winter-grazing corriente steers purchased in Mexico because of less investment in labor and facilities, shorter work season, less taxes, less interest paid to area banks, veterinary fees, et cetera, further worsening a rapidly deteriorating balance of payments situation with foreign countries.

8. BLMs proposed land trade of these public lands with developers would effectively fence in Phoenix Four Wheel Drive Club areas in Section 18, Township 6 north, Range 2 west, used by many Phoenix city dwellers, civic groups, young people and Boy Scouts as an escape to open desert areas on holidays and weekends. These folks have made excellent ranch neighbors by policing up their area and surrounding desert,

keeping gates closed and just generally watching over stock, game and ranch equipment.

9. We, Johnson-Klinefelter Desert Hills Ranch, ask that you carefully consider these foregoing stated points and disapprove, underline, this proposed land trade of BLM Public Lands with developers. Yours very truly, signed R.H. Johnson and Allen Klinefelter.

Also, there is a letter in here that BLM now has a copy of, because it was mailed to them. And I just have the copy from Arizona Fish and Game. They have constructed just north of English Wells one of those cisterns, desert cisterns that has the inverted roof that goes into the concrete basement cistern below, and it's fenced in. And they did a game count two years ago and said there were 24 wild bobcat and 200 deer and thousands of havalina, they don't know how much. And this is what BLM is talking about trading to developers that would also landlock that out in the middle of it. It's just north of English Wells.

I thank you.

MR. BAUER: Thank you, Mr. Klinefelter.

Our next speaker is Mr. Gene Jensen.

MR. JENSEN: Thank you, Mr. Bauer.

My name is Eugene Jensen, and I reside at 10120 Clair Avenue in Sun City, Arizona. I have been a resident of Arizona for six years, but in and around the state since about 1947. I'm a professional engineer with an Arizona license and I have a degree in water resource management. I have been associated with conservation since about 1935. This experience has ranged from building terraces on the family farm when I was in high school to being the technical director of the United States Environmental Protection Agency. Along with federal agencies, I have served as commissioner on the Potomac River Basin.

I'm a life member of the Nature Conservancy and past member of most of the other national conservation organizations. I have served a couple times as director of one of these organizations. I'm also active in the local community. I'm director of the homeowner's association of the advisory board of local transportation system. I'm a member of our recreational board management committee, chairman, and our hiking club elected me

committee man.

I have had three problems or three concerns with the Lake Pleasant area, which I would refer to as hieroglyphics. Generally, these fall into three areas, which I will talk about one at a time.

The first one of them is for the hieroglyphics. It seems to me that the plan, while it may be quite adequate for the present, simply isn't going to be adequate for the future of the Phoenix metropolitan area which, like it or not, is growing at a simply enormous rate. And the western property value is probably going to be the appealing part of it to developers in the near future. We are simply going to be overrun by events. We really need to be thinking long-range about some kind of a park status for that whole planning area, something resembling a national park.

Frankly, the Sonoran desert's ecotype really is simply being dissolved by developers as we go along. We have a remarkable chance to preserve it. It would be nice if 20, 25 years from now people could look back and see what kinds of decisions we made at the time. Were

they looking ahead, planning for the future? Or what did they subsequently plan for the past?

And I wanted to digress just a couple minutes here. I made a disastrous set of decisions right after I got out of college. I did one of the first water quality surveys of Lake Tahoe. And we concluded at that time that Lake Tahoe was so isolated that no one could ever get there; and, secondly, the reason is that no one would ever want to get there.

Consequently, water quality as projected would be basically a non-problem. That is just before people got interested in skiing and before the interstate highways came along. And Lake Tahoe is one of the most prominent water names. We should look far ahead just enough so we can make some long-range decisions that can do a lot better job for us and, similarly, having some kind of balanced management plan. The balanced management plan is probably all right for right now, but looking ahead farther, I think we need to come up with some kind of master plan which will transfer the Hassayampa and the adjacent Hassayampa Canyon Conservation Area, which is going to be a national operation.

On the south area, I think it would be desirable for planners to extend the boundaries just immediately west of the Agua Fria River south state highways and north Central Arizona Project. Inclusion of that area in the planning area would be consistent with the open operation space designated by Maricopa County Planning Commission.

Third is water resource management. I'm so much confused by the description of riparian protection plans which are included really throughout the record. Maybe the people from the BLM who prepared the report understood exactly what they meant, but I don't exactly understand it. I do know that we do not have very many flowing streams left in the desert mountains and we need to protect those streams. The riparian forests left that once were there probably could be brought back.

This poses some rather interesting challenges to the Bureau Of Land Management. But I also have considerable confidence in the Department Of The Interior organization. It seems to me a challenge, not something that has to be done right away, to adopt a long-range plan

and move forward. We don't have to try 30 years down the road. Maybe they will be assimilated into this kind of system.

So let's see if we can't come up with an imaginative approach to the Hassayampa.

I thank you.

MR. BAUER: Thank you, Mr. Jensen.

Mr. Gabriel Zinsli.

MR. ZINSKI: Thank you, Mr. Bauer, for allowing me to speak tonight. My name is Gabriel Zinsli. I live in Glendale, 8425 North 56th Avenue. I have a few comments to make about this management plan.

First of all, I would like to complement the writers of the document on the proposals and the good ideas they had concerning designating several areas as ACECs, which I think is a very important idea of resource conservation area for some of these areas. The specific management areas is good and the cooperative recreation management areas is a good idea also. I think we are getting down to the nitty-gritty of trying to plan these complex lands that the BLM is holding in trust for all of us.

Some more specific comments that I

have. I have a comment about off-road vehicle access. On page 31, Alternative B on it states "Vehicular travel would be limited to existing roads and trails on all the RMP area's public land with the exception of those areas specifically identified as closed."

I have previously, in my comments at other hearings here, stated that I believe that off-road vehicles should be permitted where allowed. In other words, an area should be closed and an area should be designated open to off-road vehicles only where so stated. Most areas in this 900 and some thousand acres are closed to off-road vehicles, and certain designated areas should remain open to off-road vehicles.

As far as the description limited to existing roads and trails --

Gosh, it's kind of hard to identify what trails are. For the sake of clarity, maybe we should just say they would be limited to existing roads. I don't see anywhere in here where there is any statement which strictly prohibits any vehicles from accessing riparian areas. It is very, very damaging for any kind of

21

a vehicle, motorized vehicle, to go traipsing up and down a riparian area.

A good example of damage that can be done by access is at Garcia's Wash. I was there just a few, maybe two weeks ago, on a Sunday afternoon, and there were probably 10 or 12 trucks with their loaders behind, where people were bringing in their off-road vehicles and they are going up and down Garcia's Wash, penetrating ever more into Hells Canyon, WSA.

Again, I would state the document does not deal strictly enough about off-road vehicles, while many, many comments in the previous years were given to the effect that it's necessary to control off-road vehicles. The other comment I have is that the Hells Canyon area, which is part hieroglyphic mountains and an outstanding scenic and recreational area, which is really a jewel close to the Northwest Valley, very close to the Northwest Valley, probably 20 miles from Sun City, is an area that we should consider to be very dear to us and do our very best along with many others to protect as much as possible.

The document has a weakness concerning riparian areas, and I think Mr. Jensen has

22

pointed out that the riparian areas in our Sonoran Desert have been destroyed, for their most part. The Salt River and Gila River used to flow, or at least a long time ago used to flow, for more than they do now in which they supported a cottonwood forest along its banks. This is, of course, now gone and many, many other riparian areas are really damaged very much by impoundments by off-road vehicles and by cattle grazing, and that destroys the banks.

I think in our state, and especially in the south part of our state, that riparian areas or where any water flows at all in some part of the year and any spring that exists on our BLM lands should be considered a treasure. And there are many riparian areas which have not been designated as ACECs, which I would like to see designated as such. We have, in Hassayampa Canyon, an area. In this Hassayampa Canyon area we have water flow level 12 months out of the year, springs seeping all year round, and we should protect those very rare resources in our Sonoran Desert.

The other point I have about the proposal is that it speaks very little, if

nothing, about enforcement. And I know that it is a problem with the budgetary process where monies are allocated to the Department Of The Interior so sparingly that it is a problem to enforce the existing laws and regulations. But at some point I think the point may be that we need to put some people in the field who have the power to make arrests and get people to stop destroying our public lands.

One good example is the Castle Hot Springs Road, which is now very accessible because of that new street that has been put in by the Bureau Of Reclamation. People are not happy to stay on the road and travel up and down, but they have to create parking lots on either side of the road. You can see it from Sunday to Sunday where more and more areas along the road, people are just happy to park their cars there and do anything they like: Shoot cactus, you name it. These are public lands and we see no enforcements of any laws. I know it's a problem, but at some point we cannot simply designate something in the ACECs. We can't designate Perry Mesa and not protect it, because designating that might attract even more hoodlums to

go up there and tear down the walls.

MR. BAUER: Two minutes.

MR. ZINSLI: Yes, sir.

The other comment I had was about placer mining. Placer mining is a technique by which you pump water out of a flowing stream and run it over gravel or sand, looking for gold and, then, you should be putting the water not back into the river, but put it somewhere else. The question I have is our existing placer mining activities at the intersection of the Hassayampa River and Cherry Creek, south of Wagoner, are they meeting all environmental laws and all BLM requirements?

My final points would be that of the four alternatives that I see here, I do like Alternative C the best, because it affords more protection to the ACECs with a wider acreage, especially at the Hells Canyon -- not Hells Canyon, White Canyon, where the Alternative C is four times more acreage allocated. And I think White Canyon is certainly a treasure that ought to be protected in more ways than is described in Alternative B.

Thank you, very much.

MR. BAUER: Thank you, Mr. Zinsli.

Our next speaker is Daryl Drake.

MR. DRAKE: My name is Daryl Drake. I live at 1302 West Heatherbrae and that's Phoenix, and the zip is 85013. I'm here representing the Arizona Desert Racing Association of the Arizona Outdoor Coalition and it's a western regional group called the Blue Ribbon Coalition. And I just wanted to say thanks for the considering of off-highway vehicles. And you might be interested to know, I believe tonight I know it passed the committee as an ORV program, which might help to be provide enforcement funding. And it's going to have everybody have a yearly license, something like a hunting or fishing license, together, for off roads that are paid for by tax money now.

Some of the things on off-road vehicles. I feel like a lot of us are victimized by some people with propaganda designed to antagonize. We see the same tape time after time or the same shot that is taken of, say, like the Salt River, where a lot of people use ORVs.

When I talk to lots of managers of the Bureau of Land Management around the state, the

problems have to do with types of ORVs being used in one area. Keeping all existing roads and trails open, I think, is one of the best uses. To help keep this new state plan will provide BLM and other land management Arizona agencies with money to maintain those facilities demographically. All of us are getting older and the ability to have the time or the physical ability to go out and play in desert areas is not within very many people's range. Of course, all desert experts remind us to stay with our vehicles. That's about all.

Thank you for the chance to speak. I appreciate it. Thank you.

MR. BAUER: Thank you, Mr. Drake.

Our next speaker is Bill Garver.

MR. GARVER: My name is Bill Garver. I come from Mesa and I'm the first to admit that I have just received the packet and I'm not fully abreast of the plan, in total. I have understood that there are considerations, however, to restricting certain areas from 4-wheel drive vehicles. If, indeed, that is true, as a member of Jeepers Creepers 4-wheel drive jeeping group, I would like to express our concern regarding any

plan that would restrict our great outback to access to responsible 4-wheel drive vehicles.

Our group is primarily made up of senior citizens, retired folks, numbering 40 people from all parts of the Valley, Mesa, Sun City, Sun City West, Rio Verde. And all 4-wheel operators that we have ever come across we found to be extremely responsible people that enjoy exploring the mountains and the areas off the road. Without exception, I would say that they absolutely stay on established trails or jeeping roads, and I have never seen anyone take out across virgin desert, destroying habitat, wildlife or the plants thereon.

This group and any group I have seen out there pick up, not only after themselves, but any debris always gets trucked backed in garbage haulers to the city. There is nothing left behind in any way. Everything is deposited by groups using the off road. Any plan that would restrict 4-wheel drive vehicles would severely hamper or restrict senior citizens and many others from seeing and enjoying our beautiful Arizona outback area.

I would strongly request and urge that

consideration be given to the difference between perhaps the three and 4-wheel drive Honda motorcycle-type vehicles as opposed to your Jeep and the Jeep Cherokee and Broncos and so forth type vehicles, because there is a difference where the two types of vehicles can go and some difference in the age and type of the operators. You commonly see we have people spending $20,000 and $25,000 for their vehicles. And I don't think they entend to tear up that vehicle. So there is training in accessing their environments.

Therefore, I would respecfully request that no plan be adopted which would adversely affect or hinder access to outdoor areas presently open to Jeep-type vehicles.

Thank you, very much.

MR. BAUER: Thank you, Mr. Garver.

Is there anyone who has not yet spoken who would like to speak tonight?

MR. TOWER: I have one more.

MS. FARREL: As Mr. Garver, I just recently became aware of the meeting, as well.

I'm mainly here as a representative for protection of mustangs and burros in the Lake

Pleasant area, where we currently have a burro herd. And our understanding is that the alternative would like to decrease the herd down to 80 animals. We would like to see the herd count at 180.

I'm here to bring our presentation and respectfully hope that you would take that into consideration to support Alternative B.

My name is Robin Farrel. I live at 2920 North 47th Avenue in Phoenix.

MR. BAUER: Thank you, Robin.

Is there anyone else who would like to speak tonight?

MR. MIHILOU: Yes, sir. I would like to say a few things.

MR. BAUER: Please come down.

MR. MIHILOU: My name is Bill Mihilou. I live at 1277 South Prospector's Road in Apache Junction, 85219. I really wasn't prepared to say anything tonight. Again, I really didn't study the program, but I do have a few things to say about closing lands to 4-wheel drive vehicles. I'm opposed to that. I think that off-road vehicles, such as Jeeps, et cetera, et cetera, even ATCs, we have been getting a lot of bad

publicity, I believe.

I belong to Mesa 4-wheelers, and we are a family-oriented group. And we go out and we haul out trash and stuff left by others. We get bad publicity because of the damage done, not necessarily by a person that has a 4-wheel drive. Some of the areas that have beer bottles and trash you can get there by a motor scooter or car.

Also, I think that, along with the bad publicity is that you never --

I'm really unprepared here, but I get kind of emotional over this. I have lived here since 1959 and seen the area grow. They have a very good facility, 4-wheel drive area here. I hear the area is going to be closed, and I think that if we are going to get into publicity there is a ranch area -- I am really, I'm kind of unprepared. This area has been closed to off-road vehicle use for many, many years and those of you back in there know what a beautiful area it is. If you can go back there it's completed destroyed on the left-hand side not by off-road vehicle use, but we are talking about backpackers and equestrian use.

The point I'm making is I think that we deserve a right to be tried before we are convicted. And I think that the way things are, we have to prove ourselves. And the way it is, we are guilty before given a chance.

That's all I have got to say. Thank you.

MR. BAUER: Thank you, sir.

Is there anyone else who would like to speak tonight?

MR. ROSS: Yes, sir.

My name is Tim Ross. I live at 4031 East Ludlow Drive in Phoenix, 85032, and I'm the president of Arizona State Association of 4-Wheel drive clubs. As Mr. Drake has spoken before me, with his efforts -- as Daryl Drake has spoken before, with his efforts and the efforts of the Arizona State Association, the 4-wheel Drive Clubs, we have worked diligently in coming up with an off-road vehicle plan and has said when this bill is passed --

And we have no doubt that it will.

-- that it will provide both money for policing areas; it will also provide money for education. I believe that is where the major

problem that we have today is with public land use is if we can get out into the high schools and other public areas and put on an education program that will show people that they can't destroy the desert and the things that it does to the desert, we can lick the problem. And closing lands off to all use is not the answer.

Also, I am a member of the Phoenix 4-wheelers, and we have been told various stories. And right now, I don't know which story to believe, but I think that personally I am in favor of Alternative A. I don't want to see any more lands taken away from the public and turned over to developers. The reason that we have some land being destroyed is because that people don't have a place to go to use lands. If we turn everything from I-17 to Wickenburg into one large city, the only thing that's going to do is move any potential damage out further and further and cause more problems.

We need to have education so that we can stop this kind of thing, and closing the lands is not going to do that. Thank you.

MR. BAUER: Thank you, sir.

Is there anyone else who would like to

speak tonight?

MR. GREENLY: My name Bill Greenly. I would to address this committee in reference to the Lake Pleasant area with wild burros. Alternative B is a good plan. I would like to see the herd of 80 burros increased to 130, 120. The burros out there are the last of the breed in this area from our ancient heritage of the wild west. If these burros are removed from the Lake Pleasant grazing area, our heritage will be going down with it. I believe that if the burros are removed, it's just one more step to extinction of any type of wild animals we have out here. It will be the burros, then, the bighorn sheep, the desert tortoise, you know, rattlesnakes next. Just keeping the herd at 120, 130 would be a great start. If not, Alternative B with the 80 would be fine. Thank you.

MR. BAUER: Thank you.

Art, did we have another speaker there?

Is there anyone else this evening that would like to speak? In that case, I would like to thank you all for coming out and for your comments and any written submissions will be

given full consideration.

VOICE: The record, sir, would you mind a repeating your address for the written comments?

MR. BAUER: It's in the book, yes, inside the front cover.

VOICE: Fine, thank you. I'm sorry.

MR. BAUER: The staff will remain around to answer any detailed questions you might have this evening.

And with that, I call this hearing closed.

(The hearing was closed at 8:00 p.m.)

C E R T I F I C A T E

BE IT REMEMBERED, that heretofore, on the 25th day of February, at the time and place aforesaid, the foregoing proceedings were stenographically recorded by me and thereafter transcribed, either by me or under my direction, into the foregoing pages of printed matter, and that the same contain a full, true and accurate transcription of said proceedings, all to the best of my skill and ability.

DATED at Phoenix, Arizona, this 6th day of March, 1988.

Kathy H. Grindle

Court Reporter

BUREAU OF LAND MANAGEMENT PUBLIC HEARING HELD AT THE TUCSON CONVENTION CENTER, THE COCONINO ROOM, 260 SOUTH CHURCH AVENUE, TUCSON, ARIZONA, ON THE 23RD DAY OF FEBRUARY, 1988, COMMENCING AT THE HOUR OF 7:00 P.M.

MR. RAY A. BRADY, Hearing Officer
MR. TIM L. SANDERS, Land Use Planner
MR. HENRY BISSON, District Manager
MR. ARTHUR TOWER, Area Manager

TRANSCRIPT OF PROCEEDINGS

ORIGINAL

P R O C E E D I N G S

MR. SANDERS: My name is Tim Sanders. I'm what they call the team leader to put together this Phoenix Resource Management Plan, which we are here tonight to discuss.

I assume everybody has a copy of the document. If you do not, we've got copies out in the front where you came in. You're welcome to pick one up.

In the Resource Management Planning Process, we have a 90-day public comment period on our environmental impact statement. And we are in that comment period right now and it runs until April 29th.

Also in that 90-day period, we have a formal public hearing where we are -- where we come and listen to whatever comments the public has about the Resource Management Plan that we're putting together for the Phoenix resource area.

Tonight we are having such a hearing. And as such, we do not really plan to make any presentation. We're here to listen to the comments that you have as members of the public, and we have a court reporter here who will record those comments.

After the hearing when we open and listen to people's comments and then close the hearing, we plan to have

a question and answer period. Or when that ends, we'll have all the representatives present who will talk to any of you individually who would like to talk about any of the concerns or issues, you would like to talk about concerning the Resource Management Plan.

Ray Brady is the Bureau of Land Management Safford District Manager. And he was selected to be the Hearing Officer tonight. So as such, I'm going to turn the meeting over to Ray and let him pretty much run the meeting.

He will call on whoever wishes to speak. You can either raise your right hand or else give us your name, whatever you prefer to do. And we'll run through the hearing and we'll have a question and answer period.

MR. BRADY: Thank you very much. Can you hear me there?

As Tim said, I'm Ray Brady, the District Manager with the Safford District, Bureau of Land Management, here in Arizona.

I was appointed by the Arizona State Director of the BLM to conduct this public hearing this evening under the authority of the Secretary of Interior. This hearing tonight is concerning the Draft Resource Management Plan and Environmental Impact Statement for BLM, Phoenix resource area.

Most of you have probably signed in as you came

here this evening. If you've not done so, I would encourage you to sign the sign-in sheet as you leave so that we have a complete written record of tonight's attendance here in Tucson.

If you plan to make a statement this evening, I hope that you checked the appropriate box on the sign-in sheet. If you haven't, we've only got a few people here so just raise your hands and we'll make sure you have an opportunity to speak this evening.

This hearing is being recorded by a court reporter who will prepare a verbatim transcript of everything that is said this evening. If you wish to obtain a personal copy of the transcript, you should make your own arrangements with the court reporter. And Olivia is the reporter here this evening and she is seated down in front of me.

Other BLM representatives are here this evening that I would like to introduce. First is Henry Bisson (phonetic), he is the District Manager for the Phoenix District Manager's Office. And Arthur Taylor, who is the Area Manager for the Phoenix Resource area, and Tim Sanders has introduced himself. He is the team leader for this specific planning effort.

I'd like to say a few words about the Phoenix Resource Management Plan we will be discussing this evening and hearing your comments on. The Draft Resource Management

Plan identifies four alternatives for managing some 911,000 acres of public land in the BLM Phoenix Resource Area. The land in question lies in eight counties in Arizona, very large areas encompassing counties of Apache, Navajo, Yavapi, Maricopa, Pinal, Pima, Gila and Santa Cruz.

The draft plan identifies as one of these alternatives a BLM preferred alternative. This alternative is BLM's preferred long-range plan for the area. The plan discusses such things as land exchanges, utility corridors, communication sites, special management areas and the designation of areas of critical environmental concern.

In addition, the plan identifies a long-range program for managing the planning areas for recreation resources.

Along the side of the room here this evening we have several maps that show BLM's preferred plan. And at the end of this hearing, several of the BLM representatives here in attendance this evening will be available to answer some of your more specific questions from these maps, if you'd like to come up after the hearing.

Tim briefly mentioned where we are in the planning process, but I'd like to expand upon that a little bit. The procedure that's going to be used tonight -- this hearing is not a debate or a trial or a controversial question and answer type session. It's an advisory hearing

only and all interested persons may make statements, either written or oral that are pertinent to the Phoenix Resource Management Plan.

There will be no cross examination of the people making presentations. You may request that -- members of the audience may request that certain items be clarified more. And if someone would like to have a statement clarified, if they could address that to me and then I could address that back to the speaker this evening.

I would first call upon any elected governmental officials that may be here this evening, and then we'll open the floor up for other speakers that may be present. I'd like to limit the speaking time to about ten minutes and I don't think that should create any problems this evening with the limited number of people that are here.

You may submit further written comments, if you'd like to, after your verbal comments this evening. And any written statements submitted will also be included in the transcript and will be considered on the same basis as any oral comments.

The period of time for submitting written comments is through April 29th. And any comments received up to that point in time will be included in the hearing record. The address for sending any further written comments is provided in the front cover of the plan and EIS that you

picked up in the front corridor.

This hearing tonight is being conducted during the 90-day public comment period on the draft plan. A hearing is also scheduled in Phoenix on Thursday evening of this week, February 25th. After the comment period closes on April 29th, all the comments will be reviewed by the planning team and a final plan will be prepared for the Phoenix Resource Management Plan. It is expected that in September, a final Environmental Impact Statement will be issued that includes BLM's final proposed Resource Management Plan.

And 30 days after that final EIS is issued, the proposed plan can then be implemented.

With that introductory statement, I'd like to now open up this evening's hearing for formal statements by members of the public. I'd first like to see if there's any elected official, either representative of a Congressional representative or someone from the State.

Do we have anybody -- any parties here?

Okay. Seeing none, do we have a list of names from the sign-in sheet?

MR. SANDERS: Nobody signed in to speak, but if you'd like to, you're welcome to just raise your hand and speak up.

MR. BRADY: Do we have any parties that would like to speak this evening?

A mad rush to the microphone. You in the red hat, you could go ahead to the microphone and state your name and affiliation, if you're not representing yourself, for the record.

STU BENGSON: My name is Stu Bengson. I live in Tucson and tonight I'll be representing the Arizona Mining Association, for lack of a different hat to wear tonight.

Looking through this draft, EIS, here there's a couple of concerns that I think that we're going to have. However, I really haven't had time to study the entire document thoroughly yet. So some of my comments may be out of place.

But one of the concerns that we have, that I would think that we would have, would be this acquisition of over 119,000 acres of private land that you propose in your Preferred Alternative B. And I'm not sure exactly what you had in mind there, where these lands are, how you would acquire them. Is this part of the Empire Ranch exchange or is that, you know, Empire Ranch proposal a separate process not covered in this EIS? That would be one question I would have to start off with.

Can anybody answer that at this point quickly? Or --

MR. BRADY: Mr. Sanders?

MR. SANDERS: I can probably clarify that.

MR. BENGSON: Okay.

MR. SANDERS: Our intent is we have areas identified that encompass private land where we will look at acquiring those lands. It's really dependent on the land owner coming to us and saying, "Yes, we would like to enter into some kind of trade with BLM," rather than us going to them and seeking to acquire their lands.

All we've done is identified a large area where we're going to look at acquisition. But we would like the land owners essentially to come to us to start that process.

MR. BENGSON: Do you have any specific location or area, in general, like are you looking mostly around New Waddell Dam and some of that country there or around the Empire Cienega property or what?

MR. SANDERS: The Empire Cienega is not lined in that 119,000 acres. Those private lands that are identified are in areas where we've identified resource conservation areas that we're looking at acquiring Federal or State. And whatever private lands we can.

MR. BENGSON: So those private acquisitions then would be mostly centered around these RCA's that you proposed in Alternative B?

MR. SANDERS: That's right. Yes.

MR. BENGSON: Another question I had, and like I say just really quickly going through this thing, in your

preferred alternative you expect a 50 percent reduction in mining notices and 75 percent reduction in, I presume MPO means Mining Plan of Operation?

MR. BRADY: Yes.

MR. BENGSON: Can you just briefly maybe explain that a little bit, how you figure your going to reduce mining but you're still going to allow it?

MR. SANDERS: Well --

MR. BENGSON: You know, provide for exploration and development of mineral resources?

MR. SANDERS: I think I would probably prefer to deal with that as a question when we do the final impact statement. That's a good question.

MR. BENGSON: The other thing that concerns me, also, is in particular is one of the RCA areas that you're dealing with here, White Canyon in particular. I hope you realize it's in a heavily mineralized area and the Arizona Mining Association is now in the process of developing a complete report on that area in regard to the proposed wilderness that's been suggested for that area.

And I just hope that you realize that that is a highly mineralized area, whatever management plan you come up with should account for future mineral development of that particular land there.

That's about all I've got to say for now.

MR. BRADY: Okay. Thank you, Stu.

Are there any other individuals that would like to make some oral statements this evening?

If you could state your name, please, and affiliation if you're not representing yourself?

MR. GAMBELL: My name is Neil Gambell. I'm here representing the company I work for, ASARCO. I live and work in the White Canyon resource conservation area that you've outlined in here. I'll make just a brief -- a few brief comments. We will be submitting written comments before the deadline.

I refer you to a table on Page 2-1 -- or Table 2-1 on Page 23, where you talk about the acreage in the White Canyon resource conservation area. All that breaks down to the fact that 53.1 percent of that land the Federal government doesn't own. And I find it kind of hard to believe that they're actually going to go out and acquire this land and be able to do anything with it from a management standpoint.

You can see how checkerboard that White Cânyon map is up there just to the right of -- or to your left. It's not an easy thing to do to manage that.

We operate a large open-pit mine on mostly -- on private land and there you recognize the mineral potential of the Copper Butte area.

The fact that there are mines and will undoubtedly be other mines in the area. The designation of both under Alternative B and C of the area of critical environmental concern.

And the Copper Butte Mineral District or area would close off roads at the ACEC boundary which we built in the old days and still use to access our mining claims.

And the White Canyon and Walnut Canyon areas, if they close those roads off the Gila River runs across the southern boundary of that White Canyon conservation area, there's no way to get across that river to get in there to do our assessment work. It would really hinder us.

I have some questions in the area you outlined in orange on that map is all power site withdrawals and Butte Dam withdrawals. It's my understanding that the Bureau of Reclamation is going to go ahead and build the Butte Dam in there. And I guess the land in there would come under their administration.

You've outlined it in this study for management of repairion habitat and other ideas. I don't know what you propose to do with the -- with the fact of Butte's Dam being built on the Gila River between north and south Butte in that resource conservation area.

At this time that's all I have to say about the report. I may ask some questions when we get into the

question and answer period.

Thank you.

MR. BRADY: Thank you, Mr. Gambell.

Yes, sir. If you can state your name?

MR. MONAHAN: Tom Monahan, Pima County Parks & Recreation Department analyst.

We wish to support your resource management plan for everything you're doing to us as Pima County. And acquiring the Tortolita Mountains and securing the Waterman Mountains, Silverbell area, Baboquivari and what you've done in the past on Tucson Mountain Park and all the district and neighborhood parks that you've helped us secure in Pima County. And we wish the best of luck on your resource management plan. Thank you very much.

MR. BRADY: Thank you, Mr. Monahan. Any other individuals?

One last call? Well, if there are no other individuals, I'd like to make some statements this evening.

MR. SANDERS: Did you want to speak, sir, in the blue shirt?

SPEAKER: No.

MR. SANDERS: You looked like you were getting ready to --

SPEAKER: No.

MR. BRADY: I would like to thank the

individuals that did show up this evening for coming out and showing your interest in public land management issues.

Your comments and written submissions in the future will be given full consideration in preparation of the final EIS and planning development.

As I stated previously, the record will be open through April 29th for any additional comments that you'd like to make. And I welcome you to use that opportunity to submit any further comments, if you have them.

So closing that, I want to thank you again for showing up this evening. We will be available here now to work directly with you one on one for some more questions and answers if you'd like to.

(Whereupon the hearing was concluded.)

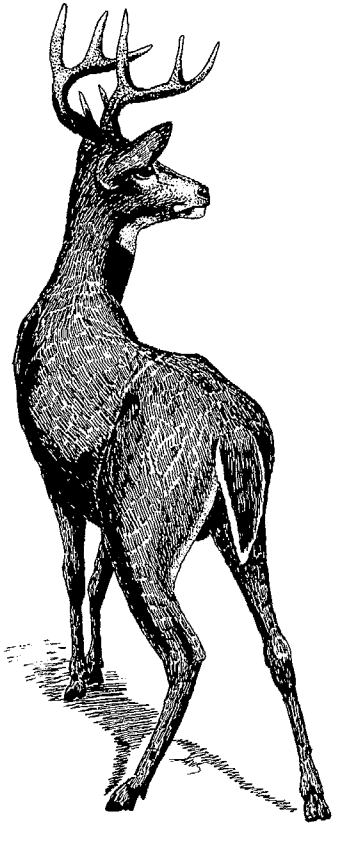
STATE OF ARIZONA)
) ss:
COUNTY OF PIMA)

I, OLIVIA ARMENTA (nee AYALA) a Notary Public in and for the State of Arizona, County of Pima, do hereby certify:

THAT this is a true and accurate record of the proceedings taken at a Hearing held on February 23rd, 1988, before RAY A. BRADY, Hearing Officer, as stenographically recorded by me and transcribed under my direction.

IN WITNESS WHEREOF, I have hereunto set my hand this 3rd day of March, 1988.

Notary Public



PUBLIC COMMENT LETTERS

Letter No.	Name
1	Annandale, John
2	Santa Fe Railroad Company
3	Ranney, Wayne
4	Sun City Hikers
5	International Society for Protection of Mustangs and Burros, Arizona Chapter
6	Maricopa Water District
7	Davis, Hiram
8	Leonard, Sandra
9	Friends of the Hyroglyphic Mountains
10	U.S. Bureau of Mines
11	U.S. Bureau of Reclamation, Arizona Projects Office
12	Jensen, Eugene
13	Miller, Charley
14	Peleck, Walter and Dorothy
15	Defenders of Wildlife, SW Office
16	Arizona State Clearinghouse
17	Maricopa County Dept. of Planning and Development
18	The Desert Tortoise Council
19	El Paso Natural Gas Company
20	Pamperin, J.
21	Notestine, Jim
22	The Arizona Nature Conservancy
23	U.S. Department of the Air Force
24	National Parks and Conservation Association
25	Prescott Audubon Society - Conservation Committee
26	Bell, Seltzer, Park and Gibson
27	Walton, Christy
28	Sullivan, Robert D.
29	U.S. Fish and Wildlife Service, Ecological Services
30	ASARCO Ray Unit
31	Pima County Open Space Committee
32	Sierra Club, Palo Verde Group
33	U.S.D.I., National Park Service, Western Region
34	Arizona Game and Fish Department
35	Sierra Club, Rincon Group
36	The Wildlife Society, Arizona Chapter
37	McKinley County Wildlife Federation
38	U.S.D.I., Bureau of Reclamation, Regional Office
39	Arizona Mining Association
40	U.S.D.I., National Park Service, Petrified Forest N.P.
41	Sierra Club, Grand Canyon Chapter, Rincon Group
42	Arizona Cattle Growers Association
43	Zinn, David
44	U.S. Environmental Protection Agency, Region IX, California
45	U.S.D.A., Prescott National Forest

PUBLIC COMMENT LETTERS - GROUPED

INDIVIDUALS

Letter No.	Name
1	Annandale, John
26	Bell, Seltzer, Park and Gibson
7	Davis, Hiram
12	Jensen, Eugene
8	Leonard, Sandra
13	Miller, Charley
21	Notestine, Jim
20	Pamperin, J.
14	Peleck, Walter and Dorothy
3	Ranney, Wayne
28	Sullivan, Robert D.
27	Walton, Christy
43	Zinn, David

GROUPS AND ORGANIZATIONS

Letter No.	Name
42	Arizona Cattle Growers Association
39	Arizona Mining Association
15	Defenders of Wildlife, SW Office
9	Friends of Hyroglyphic Mountains
5	International Society for Protection of Mustangs and Burros, Arizona Chapter
6	Maricopa Water District
37	McKinley County Wildlife Federation
24	National Parks and Conservation Association
25	Prescott Audubon Conservation Committee
41	Sierra Club, Grand Canyon Chapter, Rincon Group
32	Sierra Club, Palo Verde Group
35	Sierra Club, Rincon Group
4	Sun City Hikers
22	The Arizona Nature Conservancy
18	The Desert Tortoise Council
36	The Wildlife Society, Arizona Chapter

GOVERNMENT AGENCIES AND AFFILIATES

LOCAL

Letter No.	Name
17	Maricopa County Dept. of Planning and Development
31	Pima County Open Space Committee

STATE

34	Arizona Game and Fish Department
16	Arizona State Clearinghouse

FEDERAL

Letter No.	Name
10	U.S. Bureau of Mines
11	U.S. Bureau of Reclamation, Arizona Projects Office
23	U.S. Department of the Air Force
45	U.S.D.A., Prescott National Forest
38	U.S.D.I., Bureau of Reclamation, Regional Office
40	U.S.D.I., National Park Service, Petrified Forest N.P.
33	U.S.D.I., National Park Service, Western Region
44	U.S. Environmental Protection Agency, Region IX, California
29	U.S. Fish and Wildlife Service, Ecological Services

CORPORATIONS

Letter No.	Name
30	ASARCO Ray Unit
19	El Paso Natural Gas Company
2	Santa Fe Railroad Company

1

February 7, 1988

Mr Arthur E Tower
Phoenix Resource Area Manager
2015 W Deer Valley Road
Phoenix, AZ 85027

After carefully reading the Phoenix Resource Management Plan and Environmental Impact Statement Draft, December 1987, I decided to write to registr my surprize and astonishment!

The preferred plan alternative would try to acquire 357,190 acres of state land and 119,240 acres of private land and dispose of 427,000 acres of federal land That's nearly one million acres of land! (page xii)

You say, on page 141 that public land (federal ownership) would be reduced by 12 percent

1-1 What I want to question is your REASON for this You haven't shown me (or any reader) any PROOF that this is a GOOD IDEA

1-2 An environmental impact report should show IMPACTS. You haven't shown me (or any reader) that you looked at the IMPACTS of letting 12 percent of the federal land in your district go into other ownership

1-3 I looked for some kind of economic PROOF Unless I'm wrong you didn't even have an economist as a writer. When the Air Force and Army, or the Reclamation Bureau, or EVEN a little city council has to show people what the BOTTOM LINE is (DOLLARS), why don't you have to do this?

Or -- why don't you WANT to do this Are you trying to hide something?

1-4 I don't know much about LAW, but I don't think it is LEGAL to do what you're doing in this plan. To trade nearly a million acres (to and from) and not to tell the taxpayer what's doing on is NOT HONEST!

[illegible]
[illegible] Annandale
[illegible] 1432
[illegible], AZ 85364

1-1. The rationale for the BLM's Phoenix District land exchange program is stated on page 5 of the draft RMP/EIS under Issue 1: Land Tenure Adjustment. By using its land exchange authority, the BLM would work to consolidate public land holdings into more manageable blocks, provide greater expanses of public open space and protect rare or unique resources.

1-2. Chapter Four of the draft RMP/EIS analyzes the impacts of implementing four alternatives.

1-3. Economic determinations were made by the interdisciplinary planning team which determined that by concentrating management within larger blocks of public land, more efficient use would be made of available funds.

1-4. The Federal Land Policy and Management Act (FLPMA) of 1976 (Public Law 94-579) provides the authority and guidance for using land exchanges to serve the national interest. Public comment has also been solicited from the beginning of this planning effort. Please refer to Chapter 5 for a summary of the public input during the development of this plan.

2

Santa Fe Pacific Railroad Company

6200 Uptown Blvd. N.E. Suite 400
Box 27019
Albuquerque, New Mexico 87125
505/881-3050

February 9, 1988

Mr. Arthur E. Tower, Area Manager
Phoenix Resource Area
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Art:

2-1 This letter is in response to your request for comments to the Draft Phoenix Resource Management Plan and EIS, dated December 1987. As you are aware, the BLM and Santa Fe Pacific are working on an exchange of mineral interests through which the Federal Government will acquire Santa Fe Pacific's mineral estate beneath the Navajo relocation ranches in Apache County. Santa Fe Pacific will acquire federal mineral estates offered by the BLM in Apache, Navajo, and Coconino Counties. Santa Fe Pacific believes the Draft RMP and EIS should reflect these pending land tenure adjustments in the discussions on "Land Uses." Thank you for the opportunity to comment.

Very truly yours,

G. G. Byers
Director-Public Affairs

2-1. The draft RMP/EIS discusses possibilities for future land tenure adjustments under various alternatives.

The BLM-Santa Fe Pacific mineral estate exchange is proceeding under the authority of current management plans. Current planning will remain in force until the new RMP is approved and implementation begins.

3

February 12, 1988

Wayne Ranney
823½ W. Aspen #5
Flagstaff, AZ 86001

Arthur E. Tower
Phoenix Resource Area Manager
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

Thank you for the opportunity to respond to your Draft EIS for the Phoenix Resource Area, December, 1987. I am an active user of these lands and very interested in how they are managed in the future.

I am very much in favor of consolidation of holdings between the state, the feds, and private parties. Management of these respective areas with be enhanced if ownership blocks are consolidated. You are to be commended for this initiative.

3-1 I have some very specific comments which I hope you will take into consideration. To determine future management policy based on a simple two alternative (essentially) method is unreasonable. I would like to see the best of Alternatives B and C incorporated into a management policy. Specifically, I like your proposed Alternative B with the following additions of Alternative C: 1) The boundaries of the RCA's should be those from Alternative C because that maximizes the area of federal protection. If you can identify those areas as
3-2 being part of a manageable unit, why not include that additional acreage into the RCA? I strongly encourage you to use the Alternative C boundaries. Please include the Picacho Mountains in with this. Other lands not within the Alternative C boundaries can be used for disposal and sale. 2). Perry Mesa/Larry Canyon should be a priority ACEC in its entirity of 19,760 acres. This area is a fantastic recreational jewel and would be a great aspect of the Black Canyon RCA. Please give the PerryMesa/Larry Canyon ACEC your every consideration for inclusion as a BLM protected resource. I have wandered around up there and it is definately worth it!!!!! 3). I approve of your selection for the rest of the ACEC's. Thank you for including them. I hope you will give every consideration to my suggested additions to your Alternative B. My views represent a well-thought out vision towards how these lands will be utilized in the future.

Thank you for this opportunity.

Sincerely,

Wayne Ranney

Wayne Ranney

3-1. The decision to select a final Resource Management Plan results from a complex process summarized in Chapter 1. The process involves extensive intergovernmental and public review of a thorough analysis by BLM specialists and managers of a range of reasonable alternatives.

3-2. After consideration of public comment, the resource values present and expected availability of nonfederal land for acquisition, BLM feels the RCA boundaries proposed in this document encompass the most feasible management units.

4

SUN CITY HIKERS
Sun City, Arizona

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 Deer Valley Road
Phoenix, Arizona, 85027

Dear Mr. Tower:

We have reviewed the Draft of the Phoenix Resource Managment Plan and Environmental Impact Statment. Our comments are set forth in the following paragraphs.

We generally endorse the levels of management which have been considered,EXCEPT FOR THE URBAN AREAS, and agree that Alternative B is the best management choice. We do not agree with the conclusions that a Wilderness area should not be established in the Hells Canyon area--but also recognize that this is an independent issue. Presumably, Alternative B can accomodate Wilderness areas if they are established by the Congress.

4-1 The administrative procedures followed by the Bureau in its study process have had some unfortunate consequences insofar as the NW portion of the Valley of the Sun is concerned. This deficiency is of sufficient importance to justify a major addition to the final draft of the Management Plan and Impact Statement. Specifically, the Report should consolidate all recommendations for BLM lands that have open space potential for the NW Valley, i.e.,Lake Pleasant , Hassayampa Canyon, Sierra Estrella, North and South Maricopa Mountains and Butterfield Trail Memorial. We suggest that this be incorporated as an annex.

4-2 We believe that the Lake Pleasant Resource Conservation Area should be expanded to include approximately 12 square miles of additional land south of State Road 74 and west of the Agua Fria. Such an expansion would recognize the land use classification adopted by the Maricopa County Planning Commission, and the recreation opportunities in the Saddleback Mountain/ Paddleford Wash area. Expansion of the area would recognize the long term demand for open space that will accompany the projected population growth of the NW Valley. We are not prepared to offer specific boundaries at this time, and believe that some further examination of the area would be necessary.

4-1. Each resource area within the Phoenix District has or will be preparing a Resource Management Plan for public land under its administration. As discussed in Chapter 1, this RMP focuses on resolving six key planning issues in the Phoenix Resource Area. Any significant inconsistencies between the final plan and plans of other BLM Resource Areas will be resolved before the plan is implemented.

4-2. The proposed RMP identifies sections 25, 26 and the Saddleback Mountain portion of section 35 in Township 6 North, Range 1 West south of Arizona Highway 74 for inclusion in the Lake Pleasant RCA.

Refer also to response 17-1.

4-3 Althought we endorse Alternative B for management of the Lake Pleasant area (with inclusion of the Hassayampa Canyon area), we think that the Bureau has been short sighted in its evaluation of how this area will fulfill open space needs for the projected population growth of the Northwest Valley. We recommend that the potential need be recognized and that provisions be made for a study committee which could produce more specific recommendations within the next two years. This recommendation carries with it the acknowledgment that land trades and/or purchases may be necessary for the area to reach its full potential as a premier open-space area for the NW Valley. We are not concerned with definitions for solitude--a relative term applied in a different way in a major metropolitan area!

In substance, we believe that the Bureau should develop at least the framework for a major "outdoor recreation area" which would have many of the characteristics of the National Recreation Areas administered by the National Park Service. In addition, the Lake Pleasant area contains some of the prime remnants of the Sonoran Desert which justify some form of special classification. This proposal would also recognize that the concept of multiple resource management has a different meaning when applied in an exploding metropolitan area.

We want to again emphasize the need to consolidate the BLM recommendations for the Hassayampa River, and to avoid a fragmented managment approach. Desert streams are such a vital part of the fragile desert ecosystem that we should make a determined effort to protect both the stream and the associated riparian zones. Water quality monitoring, both biological and chemical, should also be an important aspect of "riparian" management, especially in an area with multiple resource management.

We have a few other minor comments on the draft. These are tabulated in an attachment to this letter.

We appreciate the opportunity to comment on these reports.

Sincerely

Eugene Jensen

Eugene Jensen, P.E.
Chairman, Open Space Planning

4-3. The need for open space recreation opportunities for residents of the Phoenix metropolitan area, particularly for citizens of the northwest valley, is recognized by the BLM. To advance this goal, the RMP proposes to establish the Lake Pleasant Resource Conservation Area, the Black Canyon Resource Conservation Area, the Hells Canyon Recreation Management Area and the Hassayampa River Riparian Management Area. The BLM would retain all public land in these areas and pursue the acquisition of state land through the BLM-state of Arizona exchange program. Private land may also be acquired if the exchange is initiated by the private owners.

PHOENIX RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT. Specific comments by Sun City Hikers.

4-4 Page 18. The report does not identify floodplains. Are there any floodplains and what are their potentials for recreational use.

Page 20. The statement is made that BLM does not anticipate land purchases to block-up ownership. It would be better to identify the areas that would need to be acquired for best management practices--and leave the financial questions to the budget process. Eventually, it might be quite desirable to purchase some areas to block out units, especially in the urban areas.

4-5 Page 23. It is difficult to identify those areas that might be considered for disposal under the exchange program.

4-6 Page 24. The treatment of communication sites is incomplete. It would certainly not be desirable to have the White Tanks converted into another South Mountain! Some further discussion on the number and types of facilities which would be accepted is needed.

Page 30. The SMA for the Hassayampa needs to be cross indexed to the adjacent study area. A footnote which would demonstrate consistency of management practice would be adequate.

4-7 Page 42. Recreational Management. The section includes an "it was determined" without any discussion of the basis for the determination, or identification of those who made the determination.

Page 95. Speculating on the price of copper is probably not an essential element of the report. We can probably assume that copper will continue to be an important industrial metal and that the price will go up and down!

Page 121. Recreational use. The new road is west of Lake Pleasant. Speculating on the future of Castle Hot Springs may be as risky as predicting the price of copper. Some discussion of the history of this remarkable facility would be in order.

4-8 Page 128. Where is the lower Agua Fria Valley?

Page 144. The statement on riparian management seems to be inconsistent with the projected quality as shown in Table 4-3.

Page 169. Apparently the small cities and other interest groups in the Northwest Valley did not receive copies of the Combined Report. We realize that this may be the fault of local governments and civic organizations in not responding to correspondence from BLM.

THE END

4-4. There are floodplains within the Phoenix RMP area. Floodplain suitability for various uses including recreation will be determined when specific uses or projects are proposed.

4-5. Most public land outside the boundaries of the proposed RCAs and CRMAs has been identified for disposal. Some of the disposal land will be used to satisfy the needs of local communities for recreation and other public purpose land (see Maps 2-4 through 2-10, Appendix 1, and the land status map included with the draft RMP/EIS).

4-6. Designation of the five communication sites involve planned development through site plans prepared by the BLM. These site-specific plans would address the number of buildings and types of equipment allowed on each site. Also included would be environmental assessments in compliance with NEPA. Designation of these sites would also prevent the proliferation of communication sites elsewhere.

4-7. Determinations in the draft RMP/EIS were made by the interdisciplinary team identified on pages 167 and 168 of the draft RMP/EIS.

4-8. The lower Agua Fria Valley encompasses the Agua Fria River between Lake Pleasant and its confluence with New River.

5

INTERNATIONAL SOCIETY
FOR THE
PROTECTION OF MUSTANGS & BURROS
ARIZONA CHAPTER

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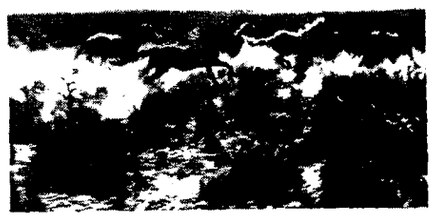


February 23, 1988

Mr. Arthur Tower
BLM, Area Manager
2015 W. Deer Valley Rd.
Phoenix, Arizona
85027

Dear Mr. Tower:

5-1 I have just received the draft for the Phoenix RMP/EIS on Friday the 19th. In reviewing it in its entirety, I would like to make comment in favor of Alternative B with one recommendation. In regard to the Lake Pleasant Burro Herd, our organization would like to see the herd size increased from 80 to minimum of 130 to protect the viability of the herd. Although, to my knowledge, there is no current data on burro herd viability, there is data available on horse herd viability. A horse herd must have a minimum of 100 horses to prevent in-breeding and deterioration of the stock. I am sure that research would show the same findings in regard to burros.

We are so pleased that the BLM has included the burros in their RMP for the Phoenix area. Many members of our organization enjoy riding and hiking the areas in search of seeing a wild burro.

I am in process of trying to change a conflicting evening appointment, so that I can attend the public hearings on Thursday, the 25th. If I am unable, I would like this letter to be read in my absence, as official comments from our organization, to be entered into the record.

Thank you for your attention.

Sincerely yours,

Karen A. Sussman

Karen A. Sussman
President, ISPMB
Arizona Chapter

5-1. The request for a minimum burro herd of 130 animals is excessive because of the other uses in the Lake Pleasant area. The herd would be managed at 80 burros, the minimum base population needed for maintaining viability according to BLM Burro Program Guidance 1-83, changes 1 and 2.

6

MWD

RECEIVED
BLM, PHOENIX DISTRICT,
PHOENIX, ARIZONA
FEB 26 1988
AM 7,8,9,10,11,12,1,2,3,4,5,6 PM

February 22, 1988

Mr.Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

RE: Phoenix Resource Management Plan and Environmental Impact Statement

Dear Mr. Tower:

Thank you for forwarding a draft copy of the Phoenix Resource Management Plan and Environmental Impact Statement to Maricopa Water District.

As the water right holder to the sub flow, flood flow and normal flow of the Aqua Fria River and its tributaries, we are extremely interested in your management plans.

A number of the Areas of Critical Environmental Concern, Special Management Areas, Cooperative Recreational Areas and Resource Conservation Areas are within the Aqua Fria Watershed.

Thus, we respectfully request your including MWD in all aspects of BLM's planning process.

If you have any questions or comments, please do not hesitate to call me.

Sincerely,

Robin E. Barnes

Robin Barnes
Management Aide

RB/yb

MARICOPA WATER DISTRICT
PO Box 260 Waddell AZ 85355
(602) 975 2151

7

Mr. Tim Sanders
BLM - Phoenix Resource Area
2015 West Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Sanders:

I am Hiram Davis, the fellow who telephoned you the other day, and whose interest is the preservation of I-17 as the "rural" highway it is to-day - at least to have it maintain some "rural" character.

Prior to our forthcoming meeting at your office on Thursday, March 3, I wanted you to have these two enclosed items:

(1) copy of remarks which I have made to the Prescott Audubon Society on the candidacy of I-17 for designation as a "Scenic Highway." It lets you know where I am "coming from"; and,

(2) copy of the "Designation Process" from ADOT with which you may well be familiar. Still, I thought a copy might be handy for ready reference. We, who favor the "Scenic Designation" for I-17, are still at the "Pre-Request" stage.

Yesterday, I was able to pick up a copy of the Phoenix RMP/EIS draft at the State office. I have just begun to read it to find out what is proposed for the land now owned by BLM in the Black Canyon Corridor, particularly if Alternative B (Preferred) were adopted.

My impression is that, under Plan B, the BLM would retain much of the land which it now owns in the Corridor and perhaps even increase its holdings to "block-up" land ownership for more efficient management. But, for what purpose(s)?

The aim of those of us who want to see a "rural" corridor preserved for I-17 - at least between population points, such as between New River and Black Canyon City - is a ribbon of open space, with natural vegetation bordering the freeway and natural vistas preserved where feasible.

I suppose that the only income-earning use for open space, if any, would be light grazing. This would be compatible with vista preservation. However, I argue that an open-space, natural corridor for I-17 would, in itself, add value to the land beyond the corridor, at least for residential use.

Turning to the large folded map labeled "Phoenix Resource Area, North Central Portion" January 1987, I have these questions/comments, moving north from the junction of State 74 and I-17:

(1) Would it be reasonable to aim for a modest open-space corridor between, say the Pioneer Village and the New River Interchange?

The frontage here on both sides of I-17 is largely owned by the State. Hopefully, the State could be persuaded that granting open-space easements along I-17 would enhance the value of the land which the State might lease/sell in this area;

(2) What would seem to be the most effective way to preserve an open-space corridor for I-17 between the New River & Rock Springs interchanges? Especially between the Table Mesa & Rock Springs interchanges?

Any contribution that BLM could make by exchanging with the State? Say, around and to the north and west of the Table Mesa interchange? (Probably provides some of the better scenic vistas along I-17 - mountains in the distance and good stands of saguaros in the foreground).

(3) And what about the preservation of saguaros themselves? Are we at, or at least near, the point where "groves" of saguaros traversed by a major highway are an "endangered" species?

7-1 For example, is there any stand of saguaros along any interstate in Arizona that can even compare with those which dot the terrain from the Pioneer Village interchange to "topping out" on the mesa just south of the Sunset Point rest stop?

Presumably the preservation of these "groves" would be enhanced if I-17 were designated a "Scenic Highway" - but may "something more" be needed? Say, the establishment of some protective zone, perhaps under the auspices/control of the State Parks Board?

(4) I move now to the I-17 segment from the Dog Track/Squaw Peak interchange at the north edge of Black Canyon City to Cordes Junction. Here, if I read the map correctly, the BLM owns the frontage on the west side of I-17, and the State that on the east.

May not this divided ownership lead to an unsatisfactory pattern? Open space on the BLM side and development on the State side of I-17? Are there any potential "block-up" exchange possibilities?

7-2 For example, BLM to get frontage from the State on the east side of I-17 between Dog Track Road and Cordes Junction in exchange for BLM land elsewhere? Such as the BLM land in the vicinity of Black Canyon City and Rock Springs?

7-3 (5) According to Map 2-13, there are two utility corridors in the Black Canyon planning segment. One follows I-17; the other, along and partly east of the Agua Fria River. From the point of view of preserving scenic vistas from "high-line" clutter, isn't the corridor to the east of I-17 to be preferred?

But enough questions and comments for now. I look forward to visting with you next Thursday. Should your schedule change, my telephone is 274-2723.

Sincerely,

Hiram S. Davis

7-1. The land fronting I-17 between the city of Phoenix and Black Canyon City is or would be administered by the state of Arizona or is under private ownership. The state develops management prescriptions for the long-term maintenance of scenic values on its land.

Public land north of Black Canyon City will be maintained under BLM administration. One of the BLM's long-term management goals for the Black Canyon Resource Conservation Area would be to block up federal ownership in the area through the BLM-state of Arizona land exchange process. This includes land along I-17 between Black Canyon City and Cordes Junction. The proposed RMP has not identified land uses seriously conflicting with the continuation of open space scenic values on public land between I-17 and the Prescott National Forest except placement of additional utility lines in the Black Canyon utility corridor. Impacts on visual and scenic values would be expected to be minimal, however. A traveler's perception of natural scenery would not be affected by the placement of additional utility lines because new lines would be parallel to and screened by existing transmission lines crossing the area.

7-2. The proposed RMP has identified new expanded boundaries for the Black Canyon RMP which include the public land one mile south of the boundary described in the draft RMP/EIS (see RCA Map 2-8 in this document).

7-3. The Alternative B corridor identified in the draft RMP/EIS is preferable due to two factors: 1) there is an existing powerline along I-17 and 2) Alternative C powerlines would further impact a National Register Archaeological District (Perry Mesa).

8

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

I read with interest the BLM's desire to consolidate the checkerboard lands it controls. My question is why does the BLM think it can control the lands of the American people anyway?? In the beginning the Lord gave the people the land and the government has choosen to take away some of our lands, hundreds of thousands and millions of acres throughout the United States. Where do they get the authority? The people of America did not get to vote on this issue. Therefore, I recommend that the BLM land be turned back into the hands of the people of America, the home of the brave and the land that used to be free from government tyr ny. Please read and study the Constitution of the U.S. as the founding fathers knew and drew up our rights as citizens, not as subjects, and learn what the God of heaven would have you do to give us back our lands so that you can stand before the Savior on judgement day and be found blameless in trying to help us regain our rights to our lands.

Thank you for letting me state and asking for my opinion. Usually things are accomplished behind closed doors.

I support your efforts in restoring our laws and rights as the original Constitution outlines.

Sincerely,

Sandra Leonard

Sandra Leonard
PO Box 1526
Lakeside, AZ
85929

9

Friends of the Hieroglyphic Mountains

8425 N. 56th Ave., Glendale, Az. 85302

March 5, 1988

Mr. Arthur Tower
Phoenix Resource Area Manager
BLM
2015 W. Deer Valley Rd.
PHOENIX, Az. 85027

Dear Mr. Tower,

The Friends of the Hieroglyphic Mountains wish to make some comments about the draft Phoenix Resource Management Plan and Environmental Impact Statement.

Our preference is for alternative C, as it contains proposals for larger ACEC's than alternative B.

9-1 Regarding the concept of Riparian Management Area; it is ill defined in the draft and it needs more precise management guidelines, such as total restriction of vehicular traffic, etc.
We also wish to recommend that all riparian habitats which are still in somewhat of a natural state and have in-stream flows of at least 20 days per year should be designated Riparian Management Areas.

9-2 We also would have liked to see Owl Head Butte (interesting formation and raptor nesting site) designated as an ACEC or SMA.

9-3 Regarding ORV's, we suggest the BLM designate which roads will be open to vehicular traffic and then print and distribute a map of the Resource Area with such roads shown. As far as the areas closed to traffic are concerned, the map should specifically detail the penalties involved by trespassing into them with ORV's. Finally anyone caught traveling in closed areas or off-road should be prosecuted. Incidentally, we welcome the addition of Desert Rangers-make sure they work weekends!

Finally, we believe the BLM should take the initiative in the proposed land trades and not wait for the owners to come forward.
Thank you for allowing these comments.

Sincerely,

Gabriel Zinsli
President

9-1. Management goals and planned actions are described for riparian areas identified for special management. Closed designations are proposed for White Canyon, Larry Creek and Tule Creek. See Tables 2-3 and 2-4 in the RMP/DEIS for specifics.

9-2. Owl Head Buttes is not public land.

9-3. As future funds permit BLM will develop and distribute a public land visitor use map. Off-road vehicle rules and user responsibilities would be described on the map. Site-specific activity planning will evaluate ORV signing needs necessary to achieve ORV management goals. Due to limited funding, intensive signing is initially anticipated only in areas with identified management concerns (ACECs and special management areas).

10

United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

March 10, 1988

Memorandum

To: Arthur E. Tower, Phoenix Resource Area Manager, Bureau of Land Management, 2015 West Deer Valley Road, Phoenix, Arizona 85027

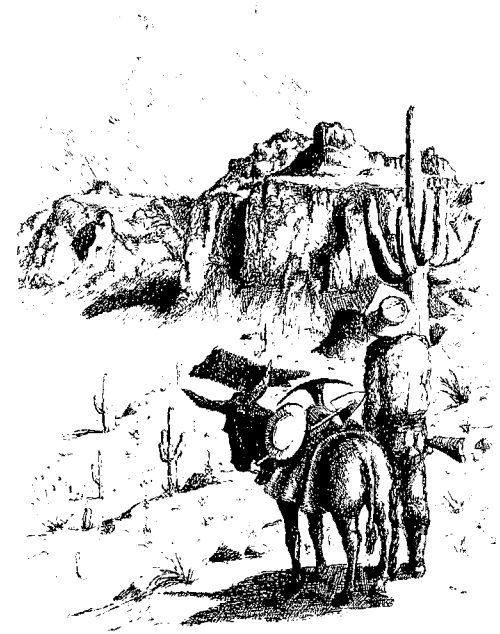
From: Chief, Intermountain Field Operations Center

Subject: Draft Phoenix Resource Management Plan and Environmental Impact Statement

As you requested, personnel of the Bureau of Mines reviewed the subject document to determine whether impacts to mineral resources and to related activities are adequately discussed. The draft document presents four alternative plans, including a preferred alternate, for managing the resources of the Phoenix Resource Area. Mineral resource exploration and development have played a major role in the growth of Arizona and have historically contributed much to its economic base. Much of that mineral activity has involved mining districts included in the resource area. Our comments are provided to help clarify or improve the mineral data presented.

The document provides a summary of mineral involvement in the resource area and also a brief analysis of mineral resource impacts by alternative. The maps showing both past mineral-producing areas and contoured densities of currently filed Notices of Intent (NOI) and Mine Plans of Operation (MPO) (p. 96-98) provide information in an easily understandable format. The table summarizing mineral development trends by mining district including base metal production from each district (Table 3-9, p. 100-101) is similarly useful. Because mineral companies currently are actively exploring and developing precious metal properties in the western U.S., we suggest that precious metal production information also be included in the table. Production figures for precious metals are available from the same source as the base metal data quoted in the table (AZ Bur. Geol. and Miner. Technol., Bull. 194)

10-1 The salient mineral resource impact addressed by the document is the de facto withdrawal of lands to mineral entry created by the land disposals proposed under Alternatives B, C, and D. Several areas proposed for disposal currently have high densities of NOI's and MPO's (p. 96-97). We recommend that an effort be made to retain under BLM management two areas having high mineral development potential: the BLM lands south of Tucson and the somewhat more continuous



10-1. The interdisciplinary planning team has determined that, as a result of implementing the proposed RMP, the reduction of NOIs from 25 to 12 and MPOs from 2 to 1 would not significantly affect the exploration for and development of marketable minerals in the Resource Area.

block of BLM lands east of Prescott. Because of the recent explosion of interest in precious metal development and the currently higher copper prices, these two areas are undergoing renewed exploration and development activity. Disposal action would create an additional burden for a struggling minerals industry and possibly make exploration and development costs prohibitive.

10-2 For Alternatives B and C, tables are provided (p. 25-26; p.28-30; and p. 35-39) that describe planned action for each special management area (SMA) and for each area of critical environmental concern (ACEC). The specific impacts to mineral resource development by creation of these areas is vague. For example, it is not clear what seasonal or other management restrictions would apply to mineral exploration and development in the Silver Bell Desert Bighorn Sheep Management Area. Tables 2-4 and 2-10 incorporate statements alluding to surface occupancy restrictions on 800 acres of Ragged Top, but no information is supplied regarding what mineral development restrictions would apply to the rest of the acreage included in the SMA. Mineral restrictions on other wildlife SMA's (desert tortoise, burro range) are also ambiguous. As an additional example, several multiple resource management areas limit motor vehicles to existing roads and trails (i.e., Table 2-4). Neither the table nor the document make it clear whether a mineral company would be permitted to establish drillroads and drillsites or develop a resource for open pit mining in these areas. In general, the tables list certain access and surface occupancy restrictions but do not clarify whether management restrictions to access would severely restrict these lands to mineral entry. Subsequent versions of the document should elaborate how each management prescription would affect mineral exploration and development activities. A chart or table specifying for each SMA and ACEC the restrictions on locatable and leasable mineral exploration and development would clarify the mineral resource impacts of Alternatives B and C. Maps showing mineral potential superimposed on areas where mineral access would be restricted would also serve to readily illustrate how each SMA or ACEC would impact mineral related activities.

In the Silver Bell Resource Conservation Area (RCA), two SMA's and an ACEC have been proposed for most of the land currently available for mineral exploration and development. Because the area has high to moderate potential for additional mineral discoveries, particularly in the area of the Waterman Mountains ACEC, we believe that access to and permission to develop minerals in this RCA should be maintained as much as possible.

William Cochran

10-2. The impacts to mineral development expected to result from ACEC designations in the proposed RMP would be 1) the requirement of a Mining Plan of Operation for exploration or development in a designated ACEC open to mineral entry, regardless of the acres disturbed and 2) elimination of filing, exploration or development in areas withdrawn from mineral entry. Activities allowed under the general mining regulations would be in force in most areas, including reasonable access to mining claims.

11

United States Department of the Interior

BUREAU OF RECLAMATION
ARIZONA PROJECTS OFFICE
23636 N. 7TH STREET
P.O. BOX 9980
PHOENIX, ARIZONA 85068

IN REPLY REFER TO 780. 330-1000

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

Dear Mr. Bisson:

Thank you for the opportunity to comment on the draft Phoenix Resource Management Plan (RMP) associated with the management of 912,000 acres of public lands in the Phoenix Resource Area. In the RMP, the East Half of Section 11 and the Northwest Quarter of Section 12, Township 15 South, Range 12 East, G&SRM is identified as lands slated for development as a cooperative recreation management area. The lands would be transferred to local governments under the R&PPA for the Saginaw Hill Park.

11-1 As you are aware the Bureau of Reclamation is constructing the Central Arizona Project which includes construction of the Black Mountain Pipeline. The pipeline will require approximately 35 acres of public domain lands located in the West Half of the West Half of the East Half (W1/2W1/2E1/2) of Section 11. This alinement for the Black Mountain Pipeline was identified in our Tucson Aqueduct, Phase B, Draft Environmental Impact Statement dated December 1984, and our subsequent Draft Environmental Assessment on proposed modifications dated December 1987. Copies of both were provided to your office for review.

A formal request for rights-of-way required for the Black Mountain Pipeline within the W1/2W1/2E1/2 of Section 11 will be submitted to you for your consideration soon. We would have no objection to the transfer of public lands, not needed for the Black Mountain Pipeline in Section 11, to other governmental entities under the R&PPA.

Additional comments pertaining to the draft RMP will be provided from our Regional Office located in Boulder City, Nevada. Again, thank you for the opportunity to review the draft plan.

Should you have any questions, please contact Mr. Dennis Burgett at 870-6734.

Sincerely yours,

for Robert J. Towles
Project Manager

11-1. As part of the CAP delivery system, the Black Mountain Pipeline would be allowed under the proposed RMP, subject to mitigation, and would be reserved to the United States in the event that the land would be transferred under the R&PP Act.

12

15 March 1988
10120 Clair Drive
Sun City, AZ, 85351

Mr. Arthur E Tower, Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona

Dear Mr. Tower:

I have made a careful review of the draft Phoenix Resource Management Plan and Environmental Impact Statement.

In the preparation of the identified draft the Bureau was faced with the need to make assessments of two classes of holdings subject to quite different pressures--those essentially rural in nature, and those located close to major urban areas. Unfortunately, the Bureau elected to use identical options and assessment techniques for both classes of areas.

The concept of balanced multiple use, including utility corridors, mining, and ranching, is certainly a sound procedure to follow in those areas which are essentially rural. However, in those areas which are adjacent to an expanding metropolitan area it would be preferable to recognize the changes that are likely to take place. Such areas will be subject to much greater pressure for recreational use, their attractiveness for ranching will decline, and they will have increasing appeal as an identified urban resource--such as the Saguaro National Monument at Tucson, the Phoenix Mountain Preserves, and the Lake Pleasant Regional Park.

It would be desirable in the development of Plans for those areas located near urban areas to recognize that the change from a rural to urban environment will not be sudden, and will likely take place over a period of years. Thus, the Adopted Plan should preferably be structured in such a way that it can readily accommodate these changes as they take place.

12-1 The dicussion of protection for the desert streams which are included in the plan leaves much to be desired. It is quite probable that the details of these protective measures plans were well known to the authors of the report. However, the report presents few details on how water quality standards will be applied or met, aquatic species protected, or riparian vegetation protected or reestablished. The remaining desert streams in Arizona are certainly deserving of the best management practices that we can formulate.

The administrative organization of the Bureau has injected an additional problem in the selection of a suitable management plan in some instances. For example, the Hassayampa River Canyon and the "upper" Hassayampa River are discussed in two different reports. This is a very undesirable arrangement given the needs for a unified management plan for the River, and the Wilderness potential of the Canyon. The

12-1. **The draft RMP/EIS identifies management problems, goals and opportunities. Specific details on methods to achieve the goals are contained in activity plans. The activity plans developed to implement the approved RMP will include environmental assessments and meet public review requirements in compliance with NEPA and the Planning Regulations.**

administrative organization problem is also reflected in the inclusion of the Maricopa Mountain and Butterfield Stage sections in still another BLM management report. Despite the size and importance of the Phoenix Metropolitan area these adjacent potential "open space" opportunities are examined by BLM in three different administrative reports.

The language of the reports with respect to roads and trails and their availability to the public is also imprecise. It would be desirable to identify those roads and trails which will be available to four wheel drive vehicles and/or ATVs.It would also be desirable to identify those locations where additional roads or trails might be needed to accommodate the needs of these interest groups.

12-2 It is quite apparent that communities and organizations in the Northwest Valley had little input in the development of the plan or of the several steps which took place prior to plan development. This lack of input might be attributed to the small size of the communities and to the difficulties of understanding an issue as complex as that faced by BLM in the assessment of its land holdings! It would be desirable to make a special effort at this time to reach these communities and groups to try to determine if they, in fact, understand the importance of the decisions which are being made.

SPECIFIC RECOMMENDATIONS:

The recommendations of the Plan with respect to those areas which are in essentially rural settings seems to be generally adequate.

12-3 Those areas which are adjacent to the major metropolitan areas should be reexamined in terms of a fifth alternative--which might be termed Metropolitan Preserve and Open Space Management! Under this concept the entire Lake Pleasant Area, which would be better named the Hieroglyphic MountainsArea, would be reconsidered in terms of its long term potential for a desert/moutain preserve, and a long term plan would be developed which would reflect the eventual conversion of the area. Such a plan would include the need for additonal roads, or improved roads in some areas, camping facilities, a visitor center oriented to the upper Sonoran Desert, designated wilderness areas, the eventual phase out of grazing and mining, and perhaps the purchase of the private lands (or conservation easements) which are now located within the area. The time schedule for such a program might well stretch out over a period of perhaps twenty years.

The boundaries of the Lake Pleasant area should be readjusted to include the Shirttail Hills area south of State Highway 74 and the Hassayampa Canyon Area to the West.

The specific measures which will be adopted for the protection and management of the desert streams in the modified Lake Pleasant area should be set forth in considerable detail. An annex to the report would be a suitable vehicle for detail of this nature.

A long-range planning and development committee for the Lake

12-2. Public involvement efforts, including newsletters, local press coverage, public meetings, and mailings to all affected local governments, were discussed in Chapter 5 of the draft RMP/EIS. Most communities in the RMP area have been involved in the Phoenix District's planning effort either directly or through their respective county associations of government.

12-3. The Phoenix District believes the alternatives considered in the draft RMP/EIS cover a sufficient range of realistic management opportunities for addressing the recreation issue in the Lake Pleasant area. For example, a cooperative recreation management area surrounding Lake Pleasant a recreation management area in Hells Canyon, a riparian management area along the Hassayampa River and special management areas to emphasize management of watershed, riparian habitat, a resident burro herd and an endangered fish species have been proposed. We believe that management emphasis being recommended for these discrete areas is compatible with multiple use management of the entire resource conservation area. Management of the entire Lake Pleasant RCA for the benefit of a single user group would be incompatible with BLM's multiple-use mandate.

12

Pleasant/Hassayampa Canyon area should be recommended. The Committee should have ample representation from the Northwest Valley communities , ranching interests, major developers, the core cities of the Phoenix metropolitan area, Metropolitan Association of Governments, State legislators, and State and County officials.

I believe that adoption of these recommendations will assure that we are planning for the Future of the Metropolitan area and not for the present of the past!

Sincerely

Eugene Jensen

copy:Congressman Stump

Black Grama

13

ELKHORN RANCH

Sasabe Star Route
TUCSON, ARIZONA 85736

March 25, 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

On February 23 I attended the public hearing in Tucson concerning the draft Phoenix Resource Management Plan. Although our feelings and concerns regarding this plan are well known, we have decided to take this opportunity to present them again.

First, we would like to thank you, Tim Sanders, and all others involved for your efforts in keeping us abreast of developements in the plan, and in listening to and taking into account our concerns regarding the plan. For this we are grateful.

13-1 This does not, however, change the fact that we are opposed to the plan in all its various forms. We do not feel a wilderness area in the Baboquivaris is necessary. The country is already wilderness due to its topography and will remain so. Access to the mountains is allowed by the area ranchers. It would be next to impossible to develop the area considered for wilderness and most of the land involved is already controlled by the BLM. Therefore, the only effect a wilderness designation would have would be to increase human traffic in the area. The country would lose much of its appeal as this traffic increased. In short, the wilderness designation would result in the area becoming less "wild".

We feel that to establish and run a wilderness area, at taxpayer expense, that results in less remote back-country is fiscally and conservationally unsound. Why not let the area ranchers continue to manage and protect the area from developement as they have been doing for years?

13-2 We are also opposed to the proposed swaps between the BLM and State Land Department in the Baboquivari area. Our concerns, as stated in prior correspondence, are as follows:

1. We are concerned as to the effect the loss of state lease revenues would have on our local school district

13-1. The impacts of designating the Baboquivari Peak Wilderness Study Area (WSA) as wilderness are analyzed in the Phoenix Wilderness FEIS. If Congress designates the WSA as wilderness a management plan will be developed. The development of the wilderness management plan would include public involvement and review, address visitor use capacity and would contain an environmental assessment in compliance with NEPA.

13-2. Section 10(b) of the Taylor Grazing Act provides that fifty percent of the grazing fees collected from BLM grazing leases are returned to the State/County where grazing occurs. Pursuant to Arizona State Law (Title 37 ARS Section 724) the returned grazing lease fees are allocated to county school districts.

13-3

2. One of the stated objectives of the plan is to provide access to Baboquivari Peak. The only area that such access is practical is Thomas Canyon. As far as access to the range is concerned, that is already provided by area ranchers.

3. Area ranchers have been around for many years. It would be cheaper and more practical to let them continue to protect the area.

4. The proposed wilderness area would increase traffic, and all the related problems, in the mountains. We do not feel that is desirable.

5. The whole plan runs contrary to the stated objectives of blocking up parcels of land for management purposes. If that were truly an important objective, the BLM would trade out of the area entirely as it is most State Lease Land.

In summary, we feel that the most logical course of action in the Baboquivari area is not to take any action. Let's not make an Aravaipa Canyon out of them. They are beautiful, but much of that beauty comes from their remoteness. Lets not spoil that.

Sincerely,

Charley Miller

cc: Glendon Collins, Federal Exchange Administrator

13-3. Since the proposed Baboquivari ACEC and wilderness study area is surrounded by private and state land, it would be necessary to obtain legal public access.

14

5122 East Citrus Street
Tucson, Arizona 85712
March 27, 1988

Arthur E. Tower
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

We have received the RMP and EIS Draft for the Phoenix District.

It appears that Alternative B, the preferred alternative, would protect and safeguard the land for future generations, which is the only criteria of any importance.

We do not believe any BLM land should be sold for private development, no matter how difficult the parcel may seem to manage. All BLM land belongs to the American public and should be preserved for Americans in all the years ahead, not developed, not sold to private interests which would put the land off-limits to Americans.

Sincerely,
Walter Dorothy Fleck

15

Defenders OF WILDLIFE

Eugene A. Dahlem
Bureau of Land Management
Phoenix Resource Area
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Dahlem:

I enjoyed our brief talks at the recent Desert Tortoise Council Symposium in Laughlin, Nevada. As I said, I was very pleased to see the proposal for a Special Management Area(SMA) for the desert tortoise in the Picacho Mountains in Alternative B of the Phoenix Resource Management Plan and EIS Draft.

After I returned home, I received a topo map of the Newman Peak quadrangle, which included the boundaries of the proposed SMA. Outlined also were four locations of desert tortoise populations studied by the Bureau of Reclamation in connection with the Central Arizona Project canal. I was dismayed to note that all four populations lie outside the SMA boundary.

153

15-1 In further examination of the map, it was obvious that the SMA boundaries are chiefly composed of the steepest portions of the area, and do not extend to the gentler foothills and outwash plains where the tortoise populations are found. I assume that this was merely a case of oversight on the part of the BLM, and that changes will be made. I strongly urge that the present boundary of the SMA be extended westward and southward by at least one full section. Even so, one of the tortoise populations would have no buffer area.

According to a large-scale land status map of the Picacho area in my possession, Newman Peak is surrounded by state land. If this is the reason for the current proposed boundaries of the SMA, something clearly needs to be done to acquire additional land for the SMA. As I mentioned to you, the state grazing permittee for that area has long been known for persistent trespass, and was fined several years ago for exceeding his permitted use by about five times. Since it is very likely that the current grazing practices of this permittee are continuing to negatively impact the desert tortoises in the area, I hope that the BLM will look into the possibility of working out some land trades that would result in a further enlargement of the SMA.

If such land trades are a possibility, I will work hard to assist the BLM to make them a reality.

Sincerely,

Steve Johnson

Steve Johnson, Southwest Representative

SOUTHWEST OFFICE 13795 N. COMO DRIVE, TUCSON, ARIZONA 85741 • (602) 297-1434
NATIONAL OFFICE 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-0519

15-1. The proposed RMP has identified state land for acquisition to include additional tortoise habitat within the Picacho Mountain RCA (see map 2-22 in this document).

Refer also to response 18-7.

16

ROSE MOFFORD
GOVERNOR

ARIZONA DEPARTMENT OF COMMERCE

STATE CAPITOL
1700 WEST WASHINGTON
PHOENIX, ARIZONA 85007
(602) 255-5371

THOMAS P. CALDWELL
DIRECTOR

MEMORANDUM

TO : DOI BLM

FROM : ARIZONA STATE CLEARINGHOUSE

DATE : April 1, 1988

RE : BUREAU OF LAND MANAGEMENT
DRAFT PHX RESOURCE MGT PLAN & EIS 15.999
AZ880219800008

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

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

The Standard Form 424 is attached for information.

No comments were received on this project or it was supported as written. If any comments are received, we will forward them to you for your consideration.

Attachment

cc: Arizona State Clearinghouse
Applicant

17

MARICOPA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT

111 S. 3rd Avenue, Room 300, Phoenix, Arizona 85003

MARICOPA COUNTY ARIZONA

BLM PHOENIX DISTRICT

APR 14 '88

DM
ADM
PA
ADMIN
OPS
MINS
RES
P&EA
PRA
LGRA
KRA
CF
Action By
Due Date

April 12, 1988

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, AZ. 85027

RE: PHOENIX RESOURCE MANAGEMENT PLAN

Dear Mr. Tower:

17-1 We have reviewed the Phoenix Resource Management Plan and find the alternative B acceptable. We can appreciate the need for BLM to consolidate its holdings and designate areas for protection. The Lake Pleasant area is of concern to us, however. We feel this area should be protected to a greater extent by the extension of the RCA to the south and east. Urban and industrial encroachment in this area will greatly reduce the quality of this area. In addition, the area adjacent to Interstate 17 should be included in the Lake Pleasant RCA. These lands would maintain the scenic value of the I-17 corridor between New River and Rock Springs. We are in support of I-17 and State Highway 74 becoming designated as scenic highways. An open space set-back could also be established by the County.

Another concern is the availability of future recreation sites. As BLM reduces its urban fringe holdings, it also reduces the availability of low-cost municipal lands. As the urban growth continues, much land will be needed in the next 10-20 years.

A third concern is the proposal that a large area of land below Highway 74 (Morristown-New River Highway) between Lake Pleasant and Morristown be disposed of to the state or private parties. While we recognize the benefit of an exchange for additional land within the RCA's, this will place a great burden on the surrounding land, given the population that eventually could reside there.

We respectfully request that land ownership and designations in the planning area be more fully addressed to answer our concerns.

Sincerely,

DENNIS W. ZWAGERMAN
PRINCIPAL PLANNER
ADVANCE PLANNING DIVISION

Richard T Bagley

Richard Bagley
Planner I
(602)262-3403

17-1. The proposed Phoenix Resource Management Plan (RMP) in this document identifies additional land along the Black Canyon Corridor for retention in public ownership, thus enlarging the Lake Pleasant RCA to the east. There are no plans, however, to identify non-public land in the area for acquisition. Land values between New River and Rock Springs make acquisition costs prohibitive when compared to the resource values gained.

The future availability of low cost public land for use by local governments has been addressed in the draft RMP/EIS. During the public scoping process, potential sites were identified by local governments. Several tracts were found to be suitable for transfer under the Recreation and Public Purposes Act (R&PPA). These were identified in the draft plan and carried over as part of the proposed RMP in this document.

The draft RMP/EIS identified the public land south of Highway 74 as suitable for exchange. However, because of public concern about the loss of open space and scenic values in the area, the proposed RMP has identified additional public land south of Highway 74 for retention in public ownership. Specifically, these areas would include sections 25, 26 and the Saddleback Mountain portion of section 35 in Township 6 North, Range 1 West. The retention area would be included within the boundary of the proposed Lake Pleasant RCA.

18

THE DESERT TORTOISE COUNCIL

5319 Cerritos Avenue
Long Beach, California 90805

10 April, 1988

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

The Desert Tortoise Council sincerely appreciates the opportunity to comment and make recommendations on the draft Phoenix Resource Management Plan. We view some promising changes in the Phoenix District's management through this plan, though some serious mistakes are made in analysis of desert tortoise population and habitat trends under different management regimes, and in planning for the benefit of the desert tortoise.

Our comments are divided into two parts, general and specific.

GENERAL

18-1 Given that virtually no inventory of desert tortoise distribution or abundance has been carried out in the Phoenix Resource Area, we contest the validity of estimates of habitat extent listed in the document. Though records exist for several areas in the RMP area, only the Picacho Mountains and the Ragged Top area have any extensive data base. How will BLM inventory its remaining areas, and, if they are found to contain major populations, how will BLM give them significant management status if they are not included in this document? What is BLM's schedule for obtaining desert tortoise data on the Phoenix lands? What effort will BLM make to ensure it does not dispose of "important" (we read crucial under BLM's definition) desert tortoise habitat when no inventory has been done? Will BLM inventory habitat slated for disposal prior to consideration for land trades? If BLM does find "important" habitat, will this be cause for careful consideration and probably retention? These questions we have not found answered in this document.

18-2 The RMP doesn't show an analysis of how BLM decided which species and habitats were to be discussed in the RMP. Why were the Picacho Mountains the only area chosen to be significant for desert tortoise management?

18-1. BLM will conduct additional desert tortoise inventories according to recommendations in a Desert Tortoise Implementation Strategy currently being finalized. It is BLM's goal to complete all inventories within five years and to update its Habitat Management Plans and amend this RMP, if necessary, to reach desert tortoise management goals.

18-2. The analysis is found in Chapter 1 beginning on page 6 of the draft RMP/EIS under the section entitled Environmental Issues.

The Picacho Mountains were chosen for desert tortoise management emphasis because they are relatively isolated with limited public access, have few multiple use conflicts and are known to support tortoise populations.

18-3 There is not a wide range of alternatives, particularly ones that BLM could be reasonably expected to implement.

Chapter 2 does not develop objectives and management prescriptions very well for ACECs, SMAs, or CRMAs. What is discussed is usually vague and not measurable. Therefore, we cannot follow any analysis BLM may have made on impacts to the desert tortoise.

Chapter 4 often describes actions BLM would take, often seen in this section for the first time in the document, instead of an analysis of impacts. Our experience with EISs and EIRs is that actions are to be presented in the chapter on alternatives.

SPECIFIC

Page 8, paragraph 2. Says alternatives would dispose of Threatened or Endangered plant habitat, again in paragraphs 5 and 6.

18-4 Doesn't BLM have a policy not to dispose of Candidate species habitat or cause federal listing? The desert tortoise is a candidate on Category 2, and the U.S. Fish and Wildlife Service has stated that federal listing is warranted, yet BLM intends to dispose of habitat. We see an inconsistency here with national BLM policy.

18-5 Page 17. The wildlife and special status plants sections show parts of the plan seem to be contrary to BLM Policies. There is little or no guidance from management on Wildlife. Certainly BLM has management guidance on how wildlife habitat and Threatened and Endangered and Candidate species are to be managed on public lands?

18-6 Page 28. The desert tortoise should be added to the Silver Bell Special Management Area as a priority for management. This would be compatible with bighorn and habitat objectives should be developed to benefit the tortoise. The area must not have many conflicting uses if BLM has slated it for bighorn emphasis. This is all the more reason for including the tortoise as a management priority. In addition, BLM has a rare permanent study plot in this area.

18-7 We commend BLM on a Special Management Area for tortoises. This kind of action is needed to ensure the future of tortoise in the wild. However, the Picacho Mountains area is much too small to be a "preserve" which would be effective in maintaining a lasting population of tortoises. Additionally, most of the habitat is on lands on the periphery of the BLM land. Consideration of this alternative must not have been made by persons with knowledge of Conservation biology, or "island biogeography." The probability of extinction of a population of tortoises (or other organisms) is roughly inversely proportional to the size of the island. BLM is essentially proposing to create an "island" preserve. BLM

18-3. We believe the alternatives analyzed are sufficient to resolve the identified issues. Other alternatives considered and the reasons for their not being analyzed are listed in the draft RMP/EIS beginning on page 41.

18-4. The BLM has a policy to manage candidate species to avoid the need for federal listing. Under the Preferred Alternative and Alternative C of the draft RMP/EIS, it was assumed that disposal would be offset by acquisition. Within the range of the desert tortoise, a decision to dispose of candidate species habitat is made only after an environmental assessment is completed.

The U.S. Fish and Wildlife Service definition states: "Candidate Category 2 contains those species for which listing is possibly appropriate but for which the Fish and Wildlife Service does not have sufficient information on hand to support their being listed as threatened or endangered at this time."

Refer also to the General Response to Comments.

18-5. As stated on page 20 of the draft RMP/EIS, the identification of land for disposal is not irrevocable. All BLM parcels in an exchange proposal would be subject to a site-specific environmental assessment which would identify and analyze impacts to desert tortoises and other values.

Refer also to the General Response to Comments.

18-6. BLM specialists did not identify the Silver Bell Mountains as a priority area for special management of desert tortoises. However, if future monitoring indicates the need, a special management area for desert tortoises in the Silver Bell Area could be designated through a plan amendment.

18-7. Several commenters have made the point that the Picacho Mountain Desert Tortoise Management Area identified in the draft RMP/EIS contains too little land mass and/or does not include the lower, state-owned bajadas where tortoise populations are more likely to be found.

Consequently, the proposed RMP has identified 7,980 state-owned acres to be acquired by exchange. Upon completion of the exchange, these acres will become part of the Picacho Mountain Desert Tortoise Management Area (area shown on map 2-22 in this document).

18-7 should realize that the main portion of the Picacho Mountains "island" is not on BLM land, and that regardless, AS MUCH LAND AS POSSIBLE should be included in this area for a viable tortoise population. Perusal of maps and data we have acquired shows that at least 24 to 30 additional sections of habitat should be included in the Special Management Area.

BLM's idea of managing the Picachos for the desert tortoise has great merit, but is doomed to failure unless the biological needs of this species are taken into account.

18-8 Management prescriptions or actions are vague, especially for wildlife and Threatened and Endangered plants. Without prescriptions, we can not see how BLM can analyze impacts of establishing and implementing management on these areas.

18-9 Page 31. Again, there are no prescriptions for CRMAs. The possible range of recreation allowed could greatly change the impacts to wildlife in these areas. Tortolita Mountains have tortoises, possibly in high numbers. There could be highly negative impacts if recreation areas in wrong spots. The Sawtooths, too, may have an "important" population of tortoises, and Hell's Canyon area definitely harbors tortoises, along with other sensitive species, such as Gilbert's skink, yet impacts of recreation are not addressed.

18-10 Page 117. Tortolita tortoise habitat is not on Map 3-4a. Perennial forbs and grasses are every bit as important as annuals, especially availability in summer-fall before hibernation.

18-11 Page 126. Also pages 142 and 159. Effects on rangeland management. This is an inaccurate heading. It has nothing to do with management of range resources (read soil and grass), just livestock management, ranch economics, and animal/ranch performance. Please change the title to what it really is.

18-12 Page 137. We take issue that downward trend is expected on 10% of habitat. How did BLM derive this analysis? We believe downward trend will probably be higher, especially at 20 years, the document's "long term," after the population of Arizona has doubled and OHVs, poachers, sightseers, land developers, and the like, has at least doubled also.

18-13 What were the analyses for determining what disposal lands would be developed in the long term? For example, most lands near I10 and the CAP would likely be developed, with downward tortoise trends. This would be detrimental to the Picacho Mountains and Silverbell areas, yet this does not seem to be analyzed.

18-14 Page 147. Desert tortoise. The document says the Silverbell Area has important habitat. There should be a management goal for the tortoise here, also.

18-8. The RMP defines goals for resolving conflicts related to the identified issues. Particular emphasis is placed on management of special management areas and ACECs. The detailed prescriptions describing how the management goals will be met are called activity plans. Activity plans are developed as part of the approved RMP's implementation.

18-9. Impacts of implementing the management prescriptions are monitored throughout the life of the RMP and changes can be made if management objectives for desert tortoises are not being met.

18-10. The omission was an oversight. The Tortolita Mountains should be indicated on map 3-4a in the draft RMP/EIS as an important desert tortoise area.

18-11. Referring to pages 7, 16 and 102 of the draft RMP/EIS under "Effects on Rangeland Management" should help explain this heading. Indirectly, livestock management, ranch economics and animal performance are all important factors in rangeland management.

18-12. Downward trend is determined by the interdisciplinary planning team from their analysis of the percentage of habitat expected to be disrupted by development during the life of the plan.

18-13. The estimates of future development on disposal land were based on growth trends as we see them now through the estimated life of the RMP (15 to 20 years).

18-14. Refer to response 18-6.

18-15 The Picacho SMA does not say anything about restriction of roads, and forbidding roads to communications sites, but chapter 4 does. There are hidden actions in this document that we can not tell will happen. BLM must have a prescription that says no roads in the Picacho Mts. Is the desert tortoise habitat to be acquired blocked up or scattered? Is habitat disposed of blocked or scattered? This makes a big difference with impact assessment. Security of populations in the long term is only made with blocked habitat. The net effect to the tortoise, we feel, is inaccurately stated in this analysis.

18-16 Page 155. Desert tortoise impacts could greatly increase with adjacent state land development and impacts due to habitat loss by visitor facilities, illegal collection, harrassment, vandalism, and forage loss. The population would not remain viable through long term, when the cumulative impacts are analyzed. Alternative B would not likely result in a viable population either, but Alternative C represents an accellerated disaster for the tortoise in the Picacho Mts.

18-17 Page 198. Desert tortoise monitoring. What is a significant change, and who decides when this change (over what threshold) has occurred? The threshold should be quantified in the RMP, as we have seen in others.

We understand that BLM may pick and choose between alternatives, and that Alternative C was not a "real" alternative, in the sense that it would constitute a viable management package on its own. We, the Desert Tortoise Council, therefore urge BLM to implement Alternative C for Communication sites, Larry Creek, Tanner Wash, Waterman Mountain, Silverbell RCA, Perry Mesa ACEC, and the White Canyon ACEC. Without implementation of these features into this RMP, measures for sensitive species such as the desert tortoise in many cases would be insufficient and much less effective for resource management into the future. Larger boundaries provided by alternative C for biologically important areas are needed to create manageable units and to manage the upland watersheds, without which, the ecosystems can't be relied on to be maintained. Viable populations can only be maintained on large blocks of habitat. Cumulative impacts must be minimized to the utmost, and this can be improved by larger boundaries. Alternative C for Lake Pleasant Burros would result in 192,000 fewer pounds of vegetation being used yearly, fewer heavily impacted areas near Lake Pleasant and springs and wash bottoms, and less vegetation removal in desert tortoise habitat.

The alternative C management for the Silverbell RCA should recognize the "important" habitat for the desert tortoise and be modified to show management emphasis for the desert tortoise, which, as we stated earlier, should be complimentary to the desert bighorn sheep.

As regards the rest of this planning effort, we recommend im-

18-15. Vehicular access restrictions for the Picacho Mountains Desert Tortoise Management Area are stated in Table 2-4 on page 28 of the draft RMP/EIS.

18-16. Refer to response 18-7.

18-17. Desert tortoise densities would be monitored using the guidelines shown in Table 2-8 of this document. BLM specialists would determine when significant change has occurred.

18

plementing Alternative B, with modifications desperately needed for the Picacho Mountains Special Management Area.

The Desert Tortoise Council stands ready to assist with development of Special Management Areas and management prescriptions for them. The Council also holds in its membership experts on desert tortoise biology, ecology, conservation area design, size, and management. We would be pleased to assist you with any desert tortoise conservation efforts.

We urge you to build on what you appear to have in mind as active beneficial management for the desert tortoise, but to take these bold steps with a clear knowledge of the resource's biology and a clear charge of establishing areas large enough to maintain viable populations of desert tortoises and other wildlife through the very long term.

Sincerely,

James A. St. Amant
Senior Co-Chairman

cc: J. David Almand, BLM Washington Office

19

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE [illegible]

April 15, 1988

Mr. Arthur E. Tower, Area Manager
Phoenix Resource Area
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Reference: Draft Phoenix Resource Management Plan and Environmental Impact Statement

Dear Mr. Tower:

El Paso Natural Gas Company (El Paso) operates one of the country's largest natural gas transportation systems, located in the southwestern United States. Since a number of El Paso's pipelines and compressor stations are within the Phoenix Resource Area, we have a vital interest in the Bureau of Land Management's (BLM's) land and resource management planning for the area.

We are particularly interested in BLM's proposal to establish a Tanner Wash Resource Conservation Area (RCA). Three of the seven proposed RCAs identified in the Draft Phoenix Resource Management Plan and Environmental Impact Statement (RMP/EIS) would have El Paso pipelines within them. The pipelines in the Silver Bell and Black Canyon RCAs would be in designated utility corridors; the pipeline in the Tanner Wash RCA would not be.

El Paso's 4-1/2" O.D. Holbrook Line crosses the northeast portion of the proposed Tanner Wash RCA, all of which is also proposed as an area of critical environmental concern (ACEC) for protection of the endangered Peebles Navajo cactus. The lands that El Paso's line crosses are currently owned by the State of Arizona (Secs. 20 and 28, T-18-N, R-20-E) and private parties (Secs. 19 and 27, T-18-N, R-20-E). BLM proposes to acquire these lands in exchange for public lands elsewhere. 19-1

El Paso wishes to cooperate in efforts to protect Peebles Navajo cactus and would support establishment of the Tanner Wash RCA/ACEC, provided continued operation and maintenance of our pipeline is not restricted unnecessarily. We request that the proposed Resource Management Plan and Final EIS specifically recognize the need for continued operation and maintenance of El Paso's 4-1/2" Holbrook Line in the Tanner Wash RCA/ACEC.

Also, it is possible a second pipeline to Holbrook could be needed in the future, depending on the amount of growth in the area. Should such a pipeline ever be needed, El Paso would prefer to build it parallel to the existing pipeline. We request that, in the Resource Management Plan, BLM retain the option to authorize a parallel pipeline adjacent to the existing Holbrook Line, provided construction of such a pipeline would not harm Peebles Navajo cactus. 19-1

Finally, the impact of ACEC designation on operation of El Paso's pipeline will not be fully known until the site-specific management plan for the ACEC is developed. When preparation of that plan begins, El Paso requests the opportunity to participate. El Paso is committed to operating and maintaining its pipeline in a manner that protects Peebles Navajo cactus.

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

Yours truly,

John Sproul

John A. Sproul, Jr.
Senior Environmental Scientist
Environmental & Safety Affairs Department

19-1. Existing rights-of-way would be honored on acquired land. A second pipeline paralleling the existing one should not negatively impact populations of Peebles Navajo cacti in the area.

The BLM's Phoenix District would welcome the cooperation of El Paso Natural Gas Company in developing a plan for maintaining its pipeline in a manner consistent with the conservation of Peebles Navajo cactus.

20

Dear Mr. Tuer:

I am writing in regards to the Phoenix Resource Management Plan and Environmental Impact Statement Draft.

After studying the document thoroughly, I have concluded the best solution to this most critical of issues is best addressed by Alternative B.

I feel that Alternative B is best suited to address the needs of the six key planning issues associated with the management of the RMP Area's public land.

Hopefully, you will concur with me that the protection of the environment is the most important issue and preserve all these prime areas for future generations.

Thank you,
John Pampeian

21

April 18, 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower

I commend you on your efforts to block up BLM lands by trading lands without special values to the public for those that do. Some of the items that you propose that I want to emphasize my support for are:

1 - ACEC designation in Alternative B - Tanner Wash, Larry Canyon, White Canyon, Waterman Mountains, Baboquivari Peak, and Appleton-Whittel Research Ranch.
2 - Designation of Coyote Mountains and Hells Canyon as RMA's as Alternative C recommends if they are not designated wilderness.
3 - Obtain legal access to Coyote and Baboquivari Mountains, and Newman Peak.
4 - Close Silver Bell/Ragged Top area to oil and gas exploration.
5 - Definitely restrict ORV use to roads and trails (Japan ships them to us but restricts them in their own country to two rocky offshore islands.
6 - Definitely acquire mineral rights on land you keep.
7 - Land to Petrified Forest N.F. is good.
8 - Tortolita Mountains land to Pima County for parks is good.
9 - Rejection of the 1986 Western Utility Group Study is the right decision.
10 - The RCA's recommended in Alternative B are best. Middle Gila Archaeological Zone should be an RCA.
11 - The Picacho Mountain's should be an FMA for desert tortoise protection, not a CRMA (however you should consider acquiring adjacent state and private land to include the footprint of the range including the bajadas.)

In addition to the above items, I urge you to change your recommendations to include the following:

21-1 1 - Ragged Top should be expanded to 15,000 acres and made a wilderness area. At a minimum an ACEC. It is an exceptionally pristine Sonoran Desert area.
21-2 2 - White Canyon WSA should be designated a Wilderness area with adjoining Tonto N.F. land and the the riparian zone should have special management including the exclusion of livestock.
21-3 3 - Eliminate burros off public land - we don't support feral dogs and cats with special protection and we shouldn't burros who are damaging our native species.
4 - You frequently mention mitigation in your document. A very abused term. If something must be mitigated - make it genuine, effective, and enforce it. Don't use it just as a meaningless loophole to get around valid requirements that are in someone's way.

21-1. The Ragged Top Wilderness Study Area (WSA) cannot be expanded and recommended for wilderness. Land west and south of the WSA includes private and state land not under wilderness study. Public land in these areas was considered for wilderness study status in 1979 and 1980, but was dropped from further consideration. This public land was found to be unnatural: powerlines, roads, jeep trails and evidence of mining were considered to be substantially noticeable. Moreover, public land south of Ragged Top lacked wilderness character, particularly solitude opportunities.

21-2. The White Canyon WSA is known to have important mineral resources and was not recommended for wilderness by the BLM. BLM studies indicate that potential development of a copper ore body is possible in the future on mining claims presently located in or near the southeastern part of the WSA. White Canyon's outstanding scenic, wildlife and cultural values would be protected as part of an ACEC with ORV travel closed or limited to existing roads and trails and no land use authorizations.

21-3. Refer to response 34-30.

21-4 5 - Cows. God Bless them anywhere but in the arid west. You acknowledge that NEPA requires you to restore and improve rangeland, and to maintain and improve habitat. You acknowledge that ranch values are higher where they have below market value grazing costs on public land. You acknowledge that grazing is negatively impacting wildlife values numerous places. What are you doing to rectify the problem as NEPA requires? Pg. 126 says you may "eventually" have to reduce grazing on lands on a downward trend! Why eventually? The law requires you to do it NOW. Grazing should be eliminated for a while on all POOR and DOWNWARD trend allottments. Reduce grazing on all FAIR allottments. Put all GOOD allottments on a plan to get to EXCELLENT. We don't subsidize other businesses that manage poorly, why should we subsidize ranchers that have managed poorly and that are wrecking our natural heritage in the process? Exclude livestock from all riparian areas - what little is left is far too precious to waste on livestock.

Thanks for your consideration of the above input. I realize you are under a lot of pressure from special interests, but don't forget you are supposed to be managing public land for the American public in perpetuity.

Gracias y hasta luego,

Jim Noteboine

Jim Noteboine

P.O. Box 461
Sonoita, AZ 85637

21-4. Grazing management for the Phoenix Resource Area has been addressed in the Range Program Summary - Record of Decision for the Eastern Arizona Grazing FEIS. The proposed RMP for the Phoenix Resource Area states prescriptions which would affect grazing management in several SMAs and the Larry Canyon ACEC. Grazing use and rangeland condition would be monitored throughout the Resource Area. This information would provide data needed to make decisions concerning livestock adjustments.

22

The Nature Conservancy

The Arizona Nature Conservancy
300 East University Boulevard, Suite 230, Tucson, Arizona 85705
(602) 622-3861

April 18, 1988

Mr. Arthur E. Tower
Phoenix Resource Area Manager
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

In response to your Draft Phoenix Resource Management Plan and Environmental Impact Statement, The Arizona Nature Conservancy submits the following comments. In accord with the major emphasis of our organization, our comments are directed towards proposed management actions related to sensitive plants and animals and significant natural areas.

SENSITIVE PLANT AND ANIMAL SPECIES

22-1 1. We strongly support the proposed southern boundary area for the White Canyon RCA. Acuna Valley cactus, (Echinomastus erectrocentra var acunensis), a Category 1 plant known from only three populations, occurs along the edges of Box'O Wash within the proposed RCA boundary area. We strongly support Alternative B boundary area for this RCA as it contains more potential habitat for the plant.

2. We strongly support your proposal to retain 640 acres of Astragalus xiphoides habitat adjacent ot Petrified National Monument.

22-2 3. Your proposed action appears to have the potential to impact several listed species. We request that a formal Section 7 consultation be initiated with the USFWS. The DEIS is not adequate as a biological assessment of how the BLM decided that particular T&E species and/or their habitats would not be significantly impacted.

22-3 4. We request that all tracts which contain perennial sections of stream that support Little Colorado River spinedace be retained in public ownership. The public land along Silver Creek is the only land below the town of Silver Creek in federal ownership. Disposal of these tracts would seriously undermine any future recovery measures that can be undertaken while the land is in public ownership (e.g.

22-1. The boundaries of the White Canyon RCA have been revised in this proposed RMP to exclude the area of Box-O Wash where the Acuna Valley pineapple cactus is known to occur (see White Canyon RCA map 2-7 in this document). The State Land Department has identified the state land in the area for retention to benefit the State School Trust. Since the state land is not available for exchange, there is no opportunity for the BLM to acquire Acuna Valley pineapple cactus habitat.

22-2. The BLM's Phoenix District is aware of its responsibilities under the Endangered Species Act. Appropriate consultation is initiated with the U.S. Fish and Wildlife Service on any pending actions which may affect federally listed species or which are likely to jeopardize a species proposed for listing.

Refer also to the General Response to Comments on Section 7 consultation.

22-3. Any future recovery efforts to benefit Little Colorado River spinedace in Silver Creek would require the cooperation of non-public landowners along 92 percent of the creek. The BLM's Phoenix District initiated consultation with the U.S. Fish and Wildlife Service in June 1988 to study the question. Pending the outcome of the consultation, the Silver Creek parcels will remain in public ownership.

Formal listing of the Little Colorado River spinedace occurred as the draft RMP/EIS was being printed. The current threatened status of the species is noted in this document.

instream flow protection) and could necessitate future expenditures of public dollars. Please note that this species is now listed threatened.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

1. We commend your proposed action which seeks to designate seven sites as Areas of Critical Environmental Concern. As you are undoubtedly aware this is the first draft RMP which proposes to designate ACECs in Arizona. Bravo!

22-4 2. Implement Alternative C for the Perry Canyon ACEC within the final preferred action and expand this ACEC boundary area to include portions of Silver Creek as depicted on the enclosed map. This short section of perennial water provides habitat for Gila intermedia, a federal Category 2 fish known from fewer than 20 sites in the state and an exemplary riparian habitat which includes cienega, a globally threatened plant community, bordered by deciduous broadleaf riparian forest.

22-5 3. A more informative presentation is necessary for the public to understand why certain areas were not evaluated for ACEC designation as stated on page 42. Although we nominated two sites for consideration, we were never formally informed as to the reasons why the Tule Creek site was rejected. We recommend that a more in-depth analysis be presented as to why areas were rejected. This will provide the public with an opportunity to further document the importance or relevance of each site.

4. We strongly support the proposed Tanner Wash, Waterman Mountain and Appleton-Whittel ACECs. We also strongly support the Larry Canyon ACEC with the above noted recommendation.

RESOURCE CONSERVATION, SPECIAL and COOPERATIVE RECREATION MANAGEMENT AREAS

22-6 1. It is not clear how the SMAs in Table 2-4 relate to the Maps on pages 67 - 81. Please clarify.

22-7 2. Include protection of ecological values of Tule Creek in the management goals of the Williams Mesa MRMA.

22-8 3. Your inclusion of such a voluminous list of SMAs suggests that you are moving towards a National Forest LMP

22-4. The proposed RMP has adopted the draft RMP/EIS preferred alternative ACEC boundaries within the Black Canyon RCA. Upon acquisition, the Silver Creek area of Perry Mesa would be managed following BLM riparian management guidelines.

22-5. The two formal ACEC nominations submitted by the Nature Conservancy (i.e., Nichol Turk's head cactus habitat and Tule Creek) were the only ones received from the public. The Nichol Turk's head cactus nomination has been incorporated into the proposed Waterman Mountains ACEC. The Tule Creek nomination was evaluated by the interdisciplinary team and found to be lacking in qualities associated with ACEC designation. The presence of an introduced population of the endangered Gila topminnow gives the area relevance, but the removal of the population by flooding has occurred in the past, thus seriously limiting the importance of the area for topminnow. The presence of a small cienega is interesting, but not unique, and cannot be considered a remnant of riverine cienegas which have largely disappeared because of channeling and dewatering.

22-6. The deficiency has been corrected in this proposed RMP/FEIS document.

22-7. As part of the Williams Mesa Special Management Area, consideration of Tule Creek would be included in the activity plan developed for the area.

22-8. The BLM's Phoenix District expects to reach the management goals proposed. Dividing the entire resource area into management units has been tried in the past and found to be inferior to the Resource Management Plan.

22-8 approach which divides the Forest into various management units. If this is the case why not be more complete and include all the lands that are managed by the Resource Area? While I find your intentions to develop activity plans for each SMA commendable, realistically we question the ability of the BLM, given various time and resource constraints, to actually develop these plans.

4. We are concerned about the proposed CRMAs. While in certain narrowly prescribed instances joint management of public lands is beneficial, the large scale approach proposed here seems dangerously excessive. A cynical perspective would be that CRMAs are a creative variation on the public lands disposal program proposed in the early 1980s (i.e. the "Sagebrush rebellion").

22-9 On page 31 the document states that these areas have been identified for "intensive recreation uses" and that each area would be jointly managed based upon a cooperative management agreement between the BLM and county or state parks agency. We question the appropriateness of targeting areas for intensive recreation uses without a careful evaluation of the impacts of such uses. We also are concerned about the level of public input that we can anticipate when such cooperative managment agreements are developed.

22-10 With in mind, we request that Alternative C for the Silver Bell RCA and that the Sawtooth Mountains be dropped from further consideration as a CRMA. We would not be opposed to a modification of Alternative C to use the Alternative B boundary area on the east boundary of the RCA.

22-11 5. The proposed Picacho Mountain Desert Tortoise Management Area, while commendable is inadequate given the habitat currently included in the proposed boundary area. We recommend that the BLM develop boundaries that include more optimal tortoise habitat and identify those areas for acquisition. We suggest the southern and eastern boundaries be expanded to include more of the mountain bajada.

22-12 6. We recommend that the boundary area for the Black Canyon RCA be expanded to include E 1/2 S 6 T12N R3E and SW 1/4 S 31 T13N R3E. This would ensure that the entire perennial stretch of Ash Creek is protected in federal ownership. 27.5 miles of riparian habitat currently in public ownership are slated for disposal under your preferred action and we urge you to agressively offset these losses by identifying

22-9. We do not agree that creation of Cooperative Recreation Management Areas (CRMAs) results in public land disposal. The public retains ownership of the CRMA and management of these areas would be consistent with federal environmental protection laws and regulations.

22-10. The request has been noted. Considering the needs of local communities for open-space and developed recreation areas, however, the BLM has incorporated the draft RMP/EIS preferred alternative proposals for CRMAs into the proposed RMP.

22-11. See comment 18-7.

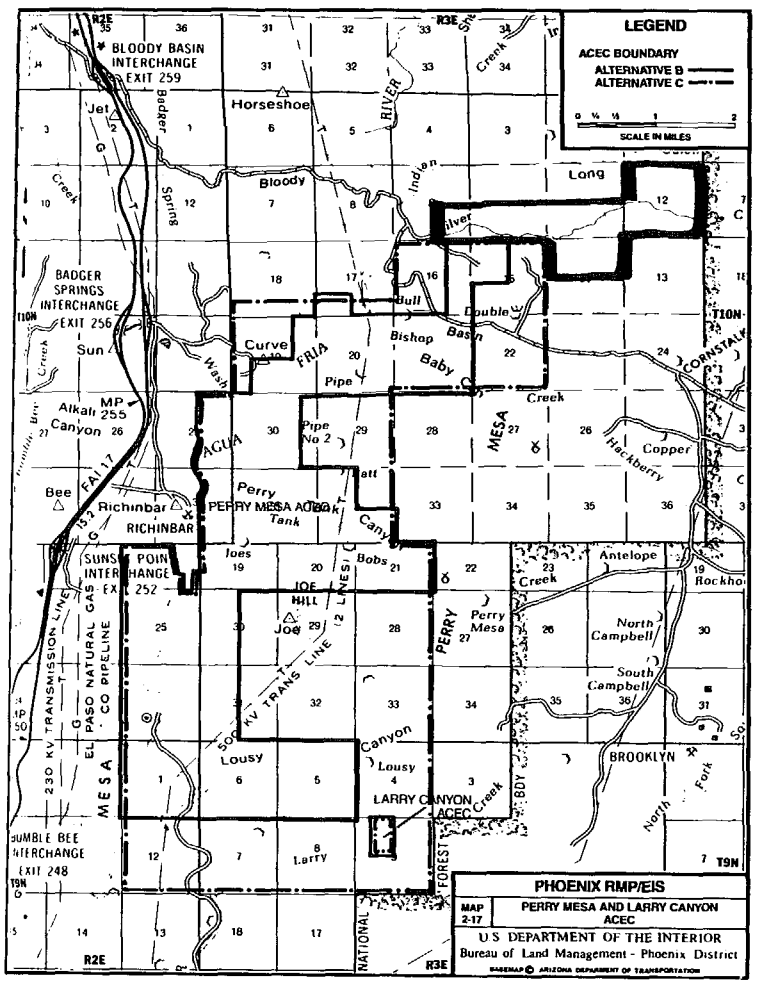
22-12. The potential loss of riparian habitat under the preferred alternative is more than offset by the proposed acquisition of 53 miles of riparian habitat representing a potential 36 percent increase.

for acquisition as many areas as possible with high riparian habitat values.

22 We appreciate the opportunity to participate in this planning process and look forward to our continuing involvement.

Sincerely,

Andy Laurenzi



23

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1316
SAN FRANCISCO, CALIFORNIA 94111-2278

REPLY TO ATTN OF: ROVP (Tye/556-0557)

SUBJECT: Phoenix Resource Management Plan & Draft Environmental Impact Statement (DEIS)

TO: Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

23-1 1. We appreciate the opportunity to review the subject DEIS and offer the following comments:

a. As shown on the attached map, the three Resource Areas evaluated in your DEIS (North Central Portion, South Central Portion, and Apache-Navajo Portion) are subject to numerous military overflights in their vicinity in the form of VFR and IFR training missions. Inasmuch as military overflights do have the potential to occasionally disrupt the solitude and naturalness of areas directly under their flight paths, we recommend you include consideration of such activities in your discussion and decision-making process. Within that context, we further recommend you consider location, altitude, and frequency of flights.

b. Areas which are appropriate for military overflights and low altitude training routes are becoming increasingly rare. In selecting overflight training routes, the Air Force must consider mission requirements and fuel costs as well as environmental constraints. Ideally, training routes are located within areas which: are relatively isolated, have diverse topography and minimal commercial activity, maintain sparse human populations, and contain lands under federal jurisdiction. It is obvious that these characteristics are also compatible to a large degree with potential wilderness areas. Therefore, even though several of the areas being proposed are subject to air training activities, the Air Force generally supports designation of wilderness areas provided such designations, and subsequent management thereof, do not restrict use of the airspace for military overflights.

2. We hope these comments are useful in your planning process. If we can be of assistance in any manner, please contact the undersigned or Mr. Michael Tye at (415) 556-0557.

Phillip E. Lammi
PHILLIP E. LAMMI, Chief
Environmental Planning Division

1 Atch: Training Route Map
cc: AF/LEEVN (Fordham)
AFREP/FAA

23-1. There is no specific prohibition of military overflight above designated wilderness areas by aircraft on essential military training missions. Where low overflight is or is expected to become a concern, wilderness management plans would provide for liaison between the BLM and the military to resolve any overflight problem.

24

BLM PHOENIX DISTRICT
APR 25 '88

NATIONAL PARKS AND CONSERVATION ASSOCIATION
Southwest-&-California Office
Box 67, Cottonwood, Arizona 86326
(602) 634-5758

RUSSELL D. BUTCHER
Southwest-&-California Representative

DM
ADM
PA
ADMIN
OPS
MINS
RES
P&EA
PRA
LGRA
KRA
CF
Action By
Due Date

April 21, 1988

RE: BLM's PHOENIX DRAFT RMP/EIS

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

National Parks and Conservation Association, a nonprofit membership organization, founded 69 years ago to promote the protection, enhancement, and public understanding of the national park system and related public lands, appreciates this opportunity to offer a few comments on the December 1987 Phoenix RMP/EIS Draft.

In general, we support and are pleased with Alternative B (Preferred Alternative)...

- to consolidate ownership and intensively manage lands within seven Resource Conservation Areas (RCAs);
- to transfer up to 4,000 acres of BLM lands to Petrified Forest National Park;
- to consolidate surface and subsurface estates through acquisition by exchange of nonfederal mineral estate underlying federal surface holdings--to retain federal subsurface mineral estate and acquire through exchange all nonfederal subsurface estate within RCAs, CRMAs, and R&PP leases;
- to enhance and protect some 74 miles of RMP areas' riparian habitat and acquire some 54 miles of state-owned riparian habitat within RCAs;
- to route utilities' facilities either along existing utility systems or so as to avoid known high natural or cultural resource areas;
- to establish six Areas of Critical Environmental Concern (ACECs) encompassing 9,971 acres; and expand the Perry Mesa ACEC upon acquisition of state lands--these six ACECs

being Baboquivari Peak, Waterman Mountains, White Canyon, Larry Canyon, Tanner Wash, Appleton-Whittell, and Perry Mesa;

- to establish 19 Special Management Areas; and
- to close some 11,760 acres and 6.5 miles of existing roads/trails to motorized vehicles--within ACECs and SMAs.

Regarding the ACECs, we do question whether Alt. B offers a large enough area to provide comprehensive protective management of White Canyon. We normally view such areas as benefiting from topographically/hydrologically oriented boundaries. While Alt. B's boundary encompasses the heart of White Canyon, it does omit some of the tributary drainages leading into White Canyon--notably in Sections 10 and 15. The White Canyon ACEC would, it seems to us, be more complete as an ecological unit were it to include not only those two sections, but the northern one-half of Sec. 22, Sec. 12, and the three-quarters of Sec. 13 not inside the Alt. B boundary. This would add about 2,720 acres to Alt. B's 2,400 acres for a total of about 5,120 acres.

We support the Tanner Wash ACEC and hope that an agreement can be reached by which the National Park Service (Petrified Forest National Park) can be given protective management authority over this critical habitat of the Peebles Navajo Cactus (Pediocactus peeblesianus, var. peeblesianus), a federally listed endangered species, and the Sword Milkvetch (Astragalus xiphoides), a candidate for federal listing. (Incidentally, on page 145 are two references to the "U.S.Park Service," which should be changed to "National Park Service.")

24-1 We enthusiastically support the Perry Mesa ACEC, and the related goal of exchanging state lands out of 8,480 acres of this vicinity. We do not understand, however, why lands acquired from the State of Arizona would be opened to mineral leasing/sales. It is our understanding that at least some of those state lands also contain significant archaeological resources; that such lands ought to be withdrawn from mineral entry; that the existing "National Register Archaeological District" should be expanded; and that BLM should implement a program of protective management of this entire, expanded cultural resources district. The ruins of "a large complex of Pueblo-like communities" (containing villages of more than 200 rooms each) built along the middle Agua Fria River (in Agua Fria and Squaw Creek canyons) by A.D. 1200, as well as evidences of other archaeological resources, clearly merit greatly enhanced protection from vandalism, looting, and other kinds of impairment. This protective management will predictably become increasingly vital as Black Canyon City, Phoenix, and other cities continue to grow rapidly.

24-2 Regarding the proposed Larry Canyon ACEC, we would simply suggest that it be joined to nearby Perry Mesa ACEC so that the manageability of that area of ACEC-worthy resources may be simplified.

Comment Letter No. 24

24-1. The BLM's Phoenix District would prepare a Cultural Resource Project Plan for the Perry Mesa ACEC upon designation. The BLM would state specific measures (including anti-vandalism measures) to protect and enhance the cultural values on Perry Mesa.

24-2. The proposed RMP in this document identifies Larry Canyon and Perry Mesa as two ACECs. The special features of each area are so different that each deserves separate recognition.

24

In the context of Alt. C's Perry Mesa ACEC discussion, we oppose that option that would allow construction of additional transmission lines so as to visually impair the National Register Archaeological District. Thus, Alt. B is preferable.

We also support ORV restrictions within all ACECs to existing readily definable roads. This constraint on ORV travel is particularly urgent within the Perry Mesa ACEC. In fact, we urge that, where possible, roads/trails that demonstrably or probably relate to cultural resource vandalism/looting be closed within the ACEC or on adjacent lands. Careful monitoring is, of course, a fundamental part of enhanced protective management. We understand that cooperative overflight surveillances of the Perry Mesa pueblo ruins are periodically carried out; we commend the Bureau of Land Management for this effort and urge it be continued, in concert with other kinds of monitoring. Are there volunteers (private individuals such as local ranchers) who can become part of a regular monitoring/networking system? We urge that the RMP/EIS document be expanded to indicate protective management of cultural resources in this and other ACECs, RCAs, and other areas.

We are really pleased with the proposed ACEC designation of BLM lands within the National Audubon Society's Appleton-Whittell Biological Research Sanctuary, and plans to manage those public lands cooperatively with the Research Ranch.

Regarding the stunningly scenic Baboquivari Peak ACEC, we hope BLM will in the future be able to expand this area--possibly through land exchanges, donations of property, or purchases of lands adjacent to the ACEC in Altar Valley. The presently proposed section-line boundary along the ACEC's east side does not provide a topographically/hydrologically or administratively logical unit. We hope eventually the ACEC can be extended eastward a mile or so, bringing in the ecologically important upper reaches of Sabino and Brown canyons; and perhaps extended southward, as well, to include the upper reaches of Thomas and Weaver canyons. It would be further of great benefit for BLM eventually to acquire the Altar Valley ranch lands all the way eastward to Highway 286, so that the magnificent panorama of Baboquivari Peak and adjacent summits of the range can be permanently protected.

Finally, regarding two of the proposed Special Management Areas: (1) we fully support BLM/State of Arizona's State Land Department's efforts, as part of the "Santa Rita Exchange," to seek an exchange of some 60,000 acres of state trust lands out of the Black Canyon Resource Conservation Area and its two proposed Special Management Areas; and (2) we likewise support a similar exchange of some 16,000 acres of state lands out of the area around Lake Pleasant, within the Lake Pleasant Resource Conservation Area's Special Management Areas. The Black Canyon Corridor and Lake Pleasant area are both highly scenic landscapes, containing outstanding geological, ecological, and cultural resources. The Hieroglyphic Mountains area of the Lake Pleasant RCA is a particularly outstanding and rugged Sonoran Desert landscape which, without special protective management by the BLM, would be almost surely in the path of rapidly expanding Phoenix. We only wish there were a way to add more or even all of the beautiful desert lands stretching farther west along the north side of Route 74...to the junction with Highway 60/89.

As for the Black Canyon RCA, this is an unusually scenic and ecologically important stretch of country reaching from the northern end of the Sonoran Desert, northward and onto the high-desert, lavallow-capped mesa land high above Black Canyon. We commend BLM for working with the State of Arizona to bring these public lands all under federal management.

Again, our thanks for this chance to offer a few of our comments.

Sincerely,

Russ

Russell D. Butcher
Southwest-&-California Representative
Box 67, Cottonwood, AZ 86326

RDB/prb

cc: D. Dean Bibles

25

PRESCOTT AUDUBON SOCIETY

20 April 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

The Prescott Audubon Conservation Committee is pleased to respond to the DRAFT of Resources Management Plan & Environmental Impact Statement, December 1987, issued by the Phoenix District Office of the U.S. Bureau of Land Management.

Position

The Prescott Audubon Society endorses the concept of "blocking up" the ownership of public lands under the management of one entity, as set forth in the DRAFT Plan.

In the application of this concept, we further endorse the proposed establishment of the Black Canyon and the Lake Pleasant Resource Conservation Areas (RCAs) as delineated on Maps 2-8 and 2-9, pages 52 and 53 of the DRAFT Plan, except that we urge:

25-1 (1) Extension of the eastern boundary of the Lake Pleasant RCA to the east of I-17 to include the lands there which give special scenic value to the portion of I-17 between New River and Rock Springs--specifically from the first east-west section line south of the Table Mountain Interchange north to the Maricopa County Line;

25-2 (2) Location of the southern boundary of the Black Canyon RCA at the north side of Dog Track/Squaw Peak Road instead of one mile north--at least for one-half, and preferably one mile on each side of I-17; and,

25-1. Refer to response 17-1.

25-2. The southern boundary of the proposed Black Canyon RCA and the eastern boundary of the proposed Lake Pleasant RCA have been expanded to include most of the described land. See maps 2-8 and 2-9 in this document.

PAS Conservation Committee 2

25-3 (3) Review of the utility corridors proposed in the Black Canyon RCA to find a route for any additional line(s) which would neither compromise views from I-17 nor intrude archeological sites on Perry Mesa.

Explanation

In urging these modifications, we are looking forward to I-17 being designated a "Scenic Highway" by the Arizona Department of Transportation, acting under ARS 41-412 through 41-518.

Our Conservation Committee is proposing that the Prescott Audubon Society participate in and support a coalition of other concerned private and public entities that will in the near future request to designate I-17 a "Scenic Highway"--probably from the junction of I-17 and State 74 at the Carefree/Wickenburg Interchange north to the city limits of Flagstaff. We expect our participation to be led by Prescott Audubon Society member Hiram Davis, who has done substantial groundwork in exploring the issue.

Why Extend Lake Pleasant RCA Eastward

The extension of the Lake Pleasant RCA to encompass the presently-owned BLM and State lands--traversed by I-17 between the east-west section line one mile south of the Table Mountain Interchange and the Maricopa County Line (just south of Rock Springs)--would insure the survival of one of the most scenic desert landscapes to be viewed from a major highway in Arizona.

Though extraordinary views will be retained for travelers on I-17 by the establishment of the Black Canyon RCA, the desert portion below the Sunset Rest Stop is one of transition--from desert to semidesert grassland--in terms of vegetation. In contrast, the landscape south of Black Canyon City is representative of the true Sonoran Desert and especially noted for its many stands of saguaros. Thus the extension of the Lake Pleasant RCA eastward to assure the survival of this scenic desert area is surely warranted; it is also practicable.

Much of the land in question is already owned by BLM and is contiguous with land which the BLM has marked for retention in the proposed Lake Pleasant RCA. In addition, the BLM is already planning to retain ownership of some land east of the proposed boundary of the Lake Pleasant RCA in order to insure the continuance of the Black Canyon Hiking and Equestrian Trail.

25-3. The proposed RMP in this document includes the utility corridors identified in the preferred alternative of the draft RMP/EIS. Restricting future facilities to parallel the existing corridor along I-17 is the environmentally preferred solution.

Why Change Southern Boundary of the Black Canyon RCA

The placing of this boundary approximately one mile north of the I-17 Interchange with the Dog Track/Squaw Peak Road, as proposed in the DRAFT Plan, risks development on the north side of this Road, and to the north along I-17, which could detract significantly from this re-entry/departure point for the Black Canyon RCA portion of "scenic" I-17.

Why not forestall an almost certain "distraction problem" for the Yavapai County Board of Supervisors by setting the boundary of the Black Canyon RCA approximately one mile farther south than now planned? Namely, the north side of the ROW for the Dog Track/Squaw Peak Road.

This portal" protection, which we feel to be essential, could probably be accomplished by dropping the present planned boundary of the Black Canyon RCA to the Dog Track/Squaw Peak Road for one-half to a mile on each side of I-17. Otherwise, the boundary proposed (per Map 2-24, page 72) could probably remain unchanged--unless there were cogent reasons to the contrary.

Why Review Utility Corridor

BLM appears to have decided to locate the next transmission line(s) in the Black Canyon RCA in the vicinity of I-17 (per page 42 of the DRAFT Plan).

We ask for a review of this decision for the purpose of finding a location for the next transmission line(s) which would least impair the scenic-view experience from I-17 and yet not intrude significant archaeological sites, such as those on Perry Mesa.

Concluding Comment

The Prescott Audubon Society much appreciates this opportunity to comment on the DRAFT Plan of December 1987 and to offer suggestions on this forward-looking program for the selective retention of lands under BLM ownership, coupled with the acquisition, by exchange, of lands owned by the State of Arizona to round out "resource-conservation areas" for effective resource management.

We are especially pleased with the application of this concept to the proposed creation of the Black Canyon RCA, lying between Black Canyon City and Cordes Junction and bordered on the west by the Prescott National Forest and on the east by the Prescott and Tonto National Forests.

In this connection, we note, with approval, the proposal to designate "Areas of Critical Environmental Concern" for special protection, including Larry Canyon and Perry Mesa in the Black Canyon RCA.

We would urge that full consideration be given to the concerns addressed here, and would encourage full discussion of these concerns with our informed Prescott Audubon member:

Hiram Davis
Box 33085
Phoenix, AZ 85067
274-2723

or

1030 Scott Dr.
Prescott, AZ 86302
445-8583

Thank you again for the opportunity to comment.

Sincerely,

Donn Rawlings,
Prescott Audubon Conservation Committee Co-Chair

26

BELL, SELTZER, PARK & GIBSON
A PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
CHARLOTTE NORTH CAROLINA 28234

April 25, 1988

EXPRESS MAIL

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Re: Draft Phoenix RMP/EIS

Dear Mr. Tower:

I am pleased to have received from the BLM the draft Phoenix Resource Management Plan and Environmental Impact Statement. Please keep my name on your mailing list.

26-1 My partner (Harry Turner of Tucson) and I own Lots 1-5 of Section 1, T9S, R6E, Lot 17 of Section 1, T9S, R6E, and NE 1/4, Sec. 9, T9S, R6E (excepting NE 1/4 NE 1/4 NE 1/4), all lying within the Silver Bell RCA (Alt. C). We present our remarks hereinbelow upon two assumptions, namely: (1) that our access to our land shall be undiminished under any of the four proposed alternatives; and (2) that the present and potential future use of our land shall be undiminished under any of the four proposed alternatives, as such. If our assumptions are in any way incorrect, we call upon the BLM to promptly so state.

Equivalent assumptions were stated in my letter of December 29, 1986 to Mr. Tim Sanders of the BLM, no response to which was ever received. I further refer to my earlier letter of December 8, 1986, and, as well, to the comments in my letter to Mr. Sanders of May 27, 1986.

Turning now to the four alternatives set forth in the draft RMP/EIS, we consider Alternative D to be completely unacceptable. The general availability of public land is one of the main factors which sets Arizona apart from most other states, and provides resident and visitor alike with a quality

26-1. Proposals presented in the draft RMP/EIS and the proposed RMP/FEIS apply only to BLM-administered land.

26

BELL, SELTZER, PARK & GIBSON

Mr. Arthur E. Tower -2- April 25, 1988

of life substantially superior to that found in, for example, West Texas, which we understand to be almost entirely privately owned.

Alternative A we find not unacceptable, although we understand the benefits to be derived from efficiencies in managing areas which are not so scattered as the current BLM land pattern. We would have no objection if Alternative A were to be adopted. However, we do agree that either Alternative B or Alternative C is to be preferred.

As between Alternative B and Alternative C, we believe Alternative C to be slightly better from a public point of view, since more BLM land would be retained, and since, as we understand it, such land would be less "intensively managed" than under Alternative B. Said another way, we think Alternative C presents the public with more land to use recreationally with more freedom at somewhat less cost. Alternative B would, of course, be acceptable as well.

Substantially, we agree completely with the BLM proposal for continued vehicular access on existing roads and trails, with only the minimal closures envisioned in aid of very special conservation situations. Further, we continue to urge that within the RCA (either Alt. B or Alt C), both mining and grazing activities be minimized, if not eliminated.

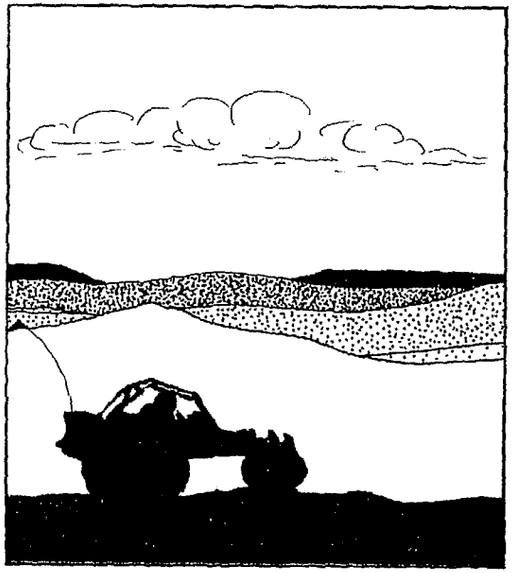
We look forward to receiving the final plan and EIS as soon as it is issued.

Very truly yours,

Joell T. Turner/jsmb

Joell T. Turner

JTT:gg
CC: Mr. Harry E. Turner



27

April 24, 1988

After reading the final RMP and EIS statement, I believe the only real and viable alternatives are B and C.

Although C does not seem to be the most manageable of the two, it does conserve the most land. I believe that aspect to be of primary importance not only for species preservation but for the enjoyment of future generations of mankind. Once developed the land is almost impossible to restore to its natural state.

27-1 Concerning public recreation areas that are, or would be intensively used around Tortolita Park, Saginaw Hill, Tucson Mountain Park, Picacho and Zion Reservoirs; why not sell the land to county and local governments at below appraisal value? These areas will be very important and accessable to our metropolitan populance and could be sold at say, an average per acre of land evaluation in the state BLM area.

Public land, public money for public use.

I also want to thank you in the BLM for the effort you have made in resolving the land use issues in Arizona.

Sincerely, Christy Walton

27-1. Saginaw Hill, Tucson Mountain Park Extension and Picacho and Zion reservoirs have been proposed for transfer to local governments under provisions of the federal Recreation and Public Purposes Act (R&PPA). The Tortolita Mountains parcels would be retained in public ownership but managed for recreation purposes under a Cooperative Recreation Management Agreement with Pima County.

28

3095 Jenny Drive
Prescott Az. 86301
April 23, 1988

Bureau of Land Management
2015 West Deer Valley
Phoenix Arizona 85027
Attn: Don Ducote
Land Use Planner

Subject: Phoenix Resource Management Plan and Environmental Impact Statement: Draft Dec. 1987

I have read with interest the above draft statement. I am particularly pleased that you intend to conserve the areas in the designated Black Canyon and Lake Pleasant Resource Conservation Areas. I urge you to make the following additions to these areas

28-1 (1) Extend the Lake Pleasant Resource Conservation area eastward to the west boundary of I 17.
This addition would provide an attractive vista for travelers on I-17 and preserve an important part of the desert ecology.

(2) Extend the Black Canyon Area area southward along I-17 to the north side of the Dog Track interchange. This would prevent development in that small area. There is adequate private land south of the interchange

Thank you

Robert M. Sullivan

28-1. Refer to response 25-2.

29

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
3616 W. Thomas, Suite 6
Phoenix, Arizona 85019
April 28, 1988

Memorandum

To: Phoenix Resource Area Manager, Bureau of Land Management, Phoenix, Arizona

From: Field Supervisor

Subject: Draft Phoenix Resource Area Management Plan (RMP) and Environmental Impact Statement (EIS) - Comments

The Fish and Wildlife Service (Service) appreciates the opportunity to review the RMP and EIS for the Phoenix Resource Area, Bureau of Land Management (BLM) and has the following comments.

GENERAL COMMENTS

29-1 The Service recognizes that RMPs guide future management actions and are not designed to provide detailed information regarding specific actions. However, the general nature of the information provided in this document makes the impacts of this major federal action difficult to assess. Specifically, State-BLM land trades are occurring and information such as land ownership is not provided for review use.

29-2 The 1986 BLM Manual (see 1622.11A) requires that management areas, objectives and directions be defined in the RMP. The Phoenix RMP defines only some priority species and habitats but does not state management objectives or prescriptions for any species or habitat. Analyzing the impact of this RMP on these species or habitats is not possible without management prescriptions. To fulfill its function as a guidance document and to provide adequate opportunity for public comment, the Service believes that this RMP should clearly state and prioritize management objectives and prescriptions, particularly for riparian areas, threatened and endangered species, federally proposed species, and other important fish and wildlife.

29-3 We believe that this RMP does not fulfill the responsibility of the BLM under Section 7 of the Endangered Species Act to consult with the Service on actions that may beneficially or adversely affect threatened or endangered species. Because some decisions regarding alternatives in this document may affect federally listed species (page 8), the BLM is required to assess the impacts of the action and submit the assessment to the Service for consultation. For example, because existing ecological conditions are expected to change after special management areas are designated (page 7), the BLM should consult with the Service on decisions regarding boundary designations in areas containing threatened or endangered species.

29-1. As stated on page 20 and illustrated in Figure 2-1, p. 21 of the draft RMP/EIS, when land is identified in an exchange package, a series of steps are taken before the actual exchange takes place. These include a site-specific environmental assessment and a published Notice of Realty Action (NORA) which are available for public review and comment.

29-2. The indication that only some priority species were considered in the draft RMP/EIS is incorrect. Appendix 8 of the draft lists the species which were considered for priority treatment and the Environmental Issues section of Chapter 1 provides the rationale for giving priority status only to species significantly affected by proposals in any of the alternatives chosen for study.

29-3. Refer to the General Response to Comments on Section 7 consultation.

29-3 Consultation is also required prior to disposal of land containing any federally listed species. Additionally, the BLM is required to confer with the Service regarding federal land exchanges which involve proposed species for federal listing. The BLM needs to consult with the Service if the BLM decides to dispose of Silver Creek, which contains Little Colorado River spinedace (Lepidomeda vittata) and in the Tucson Mountain Park Extension, which contains Tumamoc globeberry (Tumamoca macdougallii). Information presented in this document is not sufficient for the Service to determine if listed or proposed species may be affected by the alternatives.

29-4 The Service requests that the Bureau of Land Management develop a table or short narrative to summarize compliance with the Endangered Species Act, Executive Orders 11988 and 11990, Fish and Wildlife 2000, and Riparian Area Management Policy.

29-5 BLM Riparian policy, Fish and Wildlife 2000 and Executive Order 11988 and 11990 need to be evaluated in reference to continued land retention in federal ownership and those areas where exceptions for disposal are in the public interest. The Service believes that these policies should be adhered to in land exchanges and boundary designations of Areas of Critical Environmental Concern (ACEC) and Resource Conservation Areas (RCA).

29-6 For Alternatives B and C, management of motorized vehicular travel should be limited to designated roads and trails in those areas with good desert tortoise (Gopherus agassizii) densities. Dirt roads dissect tortoise habitat and result in decreased tortoise numbers within one mile of the new road. In the desert, one cross country route taken by a vehicle can result in a two-track road or trail. Once this happens this route becomes an existing road.

29-7 Communication Sites at White Tanks and Newman Peak should be dropped or permitted with the restriction that no new roads or improvements to existing roads will be allowed. These two areas contain significant tortoise habitat either at or within the foothills to these sites. Allowing additional development, such as communication sites, would result in the same negative impacts associated with new or improved road construction.

29-8 Please note that the Little Colorado River spinedace has been listed as threatened (52 FR 35034). References to its proposed status on pages 8, 115, 135, 146, 155, 161, and 190 should be changed.

29-9 The White Canyon RCA contains a candidate category 1 endangered plant. We support the commitment of BLM to consolidate land in this area. We prefer the boundary designation of Alternative B, which encompasses more known and potential habitat of this plant than Alternative C.

29-4. The section on Management Guidance Common to All Alternatives in the draft RMP/EIS and the General Management Guidance Section in this document address compliance with the provisions of the Endangered Species Act, including consultation with the Fish and Wildlife Service.

Refer also to the General Response to Comments in this document.

29-5. All applicable laws, executive orders, regulations and directives are considered when evaluating whether BLM land exchanges are in the public interest.

Refer also to the General Response to Comments on Management Guidance.

29-6. Monitoring of tortoise populations would identify impacts to desert tortoises caused by vehicular travel. Appropriate measures would be taken to protect tortoise in impacted areas. The measures may include designating or closing roads.

29-7. No new roads are anticipated to service the White Tank Mountains communication site. There are presently no roads servicing the Newman Peak site and none would be allowed under the proposed RMP. See Table 2-4 in this document under management actions for Picacho Mountains Desert Tortoise Management Area. The road closure proposals in the draft's preferred alternative for the Picacho Mountains Tortoise Management Area have been adopted in the Proposed RMP.

29-8. The proposed RMP and final EIS acknowledges the recent federal listing of the Little Colorado spinedace as threatened.

29-9. Refer to response 22-1.

The Service strongly supports the designation of the Appleton-Whittel, Baboquivari Mountains, White Canyon, Perry Mesa, Larry Canyon, Tanner Hill, and Waterman Mountains ACECs. In regard to the Waterman Mountains and Tanner Wash ACECs, we support the boundary designations given in Alternative C, because this alternative includes more known and potential habitat than Alternative B. The Service encourages the efforts of BLM to acquire State lands within the Waterman Mountains ACEC (T12S, R9E, Section 32), because

29-10 this area contains an endangered plant species. We request that the Perry Mesa and Larry Canyon ACEC be expanded to include T10N, R3E, (SE 1/4 of Section 9), Sections 10, 11, and 12. In these sections, Silver Creek has a well developed cienega bordered by deciduous broadleaf forest. Protecting this riparian area would be in consonance with BLM Riparian Policy and Executive Orders 11988 and 11990.

29-11 The Service supports the designation of the Black Canyon RCA but requests a modification of the proposed boundary. This RCA should include T11N, R2E, Section 22, E1/2, and Section 27, E1/2, and Section 34, E1/2. The creek in these sections has above-ground water and a well developed riparian area.

29-12 The Service requests that BLM consider acquisition of two sections of land near the Tanner Wash ACEC. The sections (T18N, R21E, Sections 11 and 15) contain a candidate category 1 endangered plant and could be managed as part of the Tanner Wash ACEC.

SPECIFIC COMMENTS

29-13 Page 28, Table 2-4: The Silverbell Desert Bighorn Sheep Management Area should also be designated as a desert tortoise management area. Management goals should include improving habitat conditions for and populations of desert tortoises. Planned actions should limit motorized vehicles to designated roads and trails. Motorized vehicle access should be closed in those areas with good tortoise numbers (>50 per square mile). Planned actions should include determining the status of the desert tortoise population in this area and developing an appropriate management plan.

29-14 Page 28, Table 2-4: The Service strongly supports designation of the Picacho Mountains Desert Tortoise Management Area. However, we recommend that the management goals be changed to improve existing desert tortoise populations. This management would require routine monitoring of this population for "status and trend." Planned actions are excellent and should be carried through as a priority. Please note that this area is probably too small to protect a viable population as most of the tortoise habitat is on State lands. We recommend that BLM pursue acquisition of adjacent habitat with the State of Arizona.

29-15 Page 31, Issue 5 - Recreation Management: When preparing the activity plan for the Hells Canyon Recreation Management Area, BLM should develop the plan to minimize or avoid impacts to the desert tortoise and Arizona skink

29-10. Refer to response 22-4.

29-11. These areas are within the proposed boundaries of the Black Canyon Resource Conservation Area (RCA) as identified in Alternatives B and C of the draft RMP/EIS and are included within the boundaries of the RCA in the proposed RMP.

29-12. Only private land within the identified Resource Conservation Areas is identified for possible acquisition by exchange in the proposed RMP. Any private exchanges would be considered if the proposal is initiated by the private landowners.

29-13. Refer to responses 18-6 and 29-6.

29-14. Refer to response 18-7.

29-15. All relevant environmental issues will be considered when developing activity plans for specific areas.

(Eumeces gilberti arizonensis). Motorized vehicles should be limited to designated roads and trails.

29-15 The Tortolita and Sawtooth Mountains have been identified as important areas for intensive recreation uses. Both areas provide habitat for tortoises, possibly in high numbers. In planning and managing these Cooperative Recreation Management Areas (CRMA), the population status of the tortoise should be determined first, and then followed by development of recreation management plans that limit or avoid adverse impacts to the tortoise and its habitat. Some of the area within the Lake Pleasant CRMA also contains suitable habitat for the desert tortoise.

29-16 Page 116, Map 3-4A: Desert tortoise habitat is not shown on this map.

29-17 Page 147, Desert Tortoise: General figures on habitat acquisition and disposal for the desert tortoise are presented, but information is lacking on where these parcels are located, whether they are adjacent to existing tortoise habitat on BLM land, and whether the acquired and disposed of lands would result in blocking up tortoise habitat for effective management or scattering habitat ownership. The latter should be avoided to maximize the protection of the tortoise. Also, the impacts associated with land ownership patterns to the desert tortoise should be addressed in this RMP.

29-18 This section states that Silver Bell Mountains and Donnelly Wash-Grayback area would be managed to maintain habitat capability for the desert tortoise. This management goal should be identified on pages 28-29 under the appropriate Special Management Areas (SMA) and activity plans should be developed to enhance desert tortoise habitat. This described benefit to the desert tortoise is not indicated in the management goals for these two SMAs.

29-19 The designation of the communication sites in the Picacho Mountains could impact desert tortoise populations if access to these sites is provided by constructing new roads or improving existing roads. These roadways will pass through tortoise habitat at the lower elevations.

29-20 The conclusions presented on the effects of Alternative B seem unclear and are not substantiated by the information provided. For example, information is lacking on the status of the desert tortoise on lands identified for disposal and for acquisition. Therefore, BLM may not be able to conclude the extent of impacts to this species. We request that BLM provide this information and or, if this is not possible, include a worst case analysis. We believe that the RMP draft EIS does not analyze mitigation measures in sufficient detail to determine the effectiveness of each of these measures for the desert tortoise.

29-16. The desert tortoise distribution map in the draft RMP/EIS indicates only known important habitat in the resource area, as stated on page 117 of the draft. The Tortolita Mountains important habitat was inadvertently left off the map, but was included in the discussion of important desert tortoise areas.

29-17. Where appropriate, the desert tortoise is considered in every environmental assessment completed prior to all land exchanges.

Refer also to response 29-1.

29-18. Activity plans developed for areas within desert tortoise habitat would consider the affect the actions would have on the capability of the habitat to support tortoises.

29-19. Refer to responses 29-6 and 29-7.

29-20. The information on page 147 of the draft RMP/EIS provides the status of known important tortoise habitat on land identified for disposal and acquisition.

Refer also to comments 29-1 and 29-17.

Page 155, Desert Tortoise: Our comments on this section are the same as those mentioned above referring to page 147. Data need to be presented that document the overall numbers of tortoises on BLM land in the Picacho Mountains and to substantiate the overall long term stability of this species in the Picacho Mountains.

Again the conclusion presented on maintaining the viability of the Picacho Mountain and other populations in the RMP area is unsubstantiated based on the information presented in this RMP draft EIS. Please provide adequate information to support this conclusion or present a worst case analysis in the RMP draft EIS.

29-21 Page 163, Mitigating Measures: The Service does not concur with this approach of deferring the development of mitigation measures until specific projects are developed. Generally, when specific projects are developed by BLM and an environmental assessment prepared, these environmental documents are generated and approved in-house with little or no review by the Service. Also, development of mitigation measures on a project by project basis may fail to consider the cumulative impacts of such actions.

29-22 Page 190, Appendix B: The jaguar and ocelot should be considered throughout the RMP draft EIS analysis and recovery plan goals/objectives should be included where appropriate for BLM to perform. Historic habitat is located near the Baboquivari Mountains. Recent sightings of jaguars have been made in this area.

29-23 Page 198, Appendix 12: This document lacks a Resource Monitoring and Evaluation Plan for Alternative C.

Page 198, Appendix 12, Desert Tortoise: The Service recommends that that this section include a definition of crucial habitat including criteria to be used in making this determination, and criteria used to determine a "significant decrease of habitat capability" and "significant population changes." We also request that the information obtained from line transects on relative densities and habitat condition monitoring be provided to this office as soon as it is available. The Service would like to offer our assistance in implementing these monitoring measures.

SUMMARY COMMENTS

The Service supports preferred Alternative B with our suggested modifications. We believe that Alternative B with these modifications maximizes resource benefits to threatened and endangered species, desert tortoise concerns, and riparian fish and wildlife resources. The Service would like to assist BLM in the development of the above-listed management plans that affect candidate, proposed, and listed species.

Again, the Service appreciates the opportunity to review and provide comments on the subject draft RMP and EIS. If we can be of further assistance, please contact Ms. Sue Rutman or me (Telephone: 602/261-4720).

Sam F. Spiller

Sam F. Spiller

29-21. Refer to the General Response to comments.

29-22. The BLM's Phoenix District has no information indicating that public land in the Phoenix Resource Area is used or occupied by jaguars or ocelots.

29-23. All the areas and values which would be monitored under Alternative C in the draft RMP/EIS are included in the monitoring schedule listed for Alternative B.

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ASARCO

RAY UNIT
RICHARD W BANGHART
GENERAL MANAGER
OWEN D MILLER
CONTROLLER

April 27, 1988

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Dear Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

ASARCO Incorporated's Ray Unit submits the following comments on the Bureau of Land Management's Draft Environmental Impact Statement for the Phoenix Resource Management Plan.

Our comments specifically address the White Canyon Resource Conservation Area which contains ASARCO's Ray Mine and the Copper Butte and Buckeye properties. The Ray Mine employs 480 people and produced 107,700 tons of copper in 1987, valued at $128,600,000.

ASARCO Ray Unit supports Alternative A. (no action) for the White Canyon Area. We oppose the BLM's preferred Alternative B for the following reasons:

1. The proposed White Canyon Resource Conservation Area contains known mineral deposits which are important to the economy of Pinal County and Arizona. In addition to the millions of dollars we paid in wages, sales taxes and metal values taxes in 1987, we paid $1,699,000 to Pinal County for property tax. We note on page 93 that the BLM paid $386,068 to Pinal County in lieu of taxes in 1986. ASARCO's tax dollars are real in contrast to in-lieu payments which are tax dollars to begin with.

30-1 2. Besides the Ray deposit, ASARCO has delineated copper deposits at Copper Buttes (22,000,000 tons averaging 1.09 % copper) and Buckeye (20,000,000 tons averaging .65 % copper). The proposed White Canyon ACEC (page 62) under both alternatives B and C would restrict exploration for, and development of, the area's copper resources. Closing the road in Sections 23 and 24, Township 3 South, Range 12 East would deny ASARCO access to its mining claims. This road is the only maintainable route to the mineral rich area north of the Gila River between Riverside and Cochran.

ASARCO INCORPORATED RAY UNIT
P O BOX 8 HAYDEN AZ 85235 (602) ? ?811

30-1. The establishment of White Canyon ACEC would have little impact on ASARCO mining operations in the area or within the ACEC. No prescriptions are proposed closing the area to mineral entry. Under the mining law, the BLM cannot deny access to ASARCO's mining claims or prevent ongoing exploration and development programs. Necessary access routes would be constructed to minimize or avoid impacts to White Canyon's riparian, wildlife and scenic resources.

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3. The Federal Government has title to less than half (46.9%) of the total 330,770 acres in the proposed White Canyon Resource Conservation Area (page 23). Private interests and the state own 53.1% of the area. Federal, state, and private lands are intermingled which is not conducive to a single interest area management concept such as Alternative B. This point is best made by referring to the Phoenix District land status map where we note that the largest contiguous block of BLM land in the 516 square mile resource area is the 24-square mile parcel in the extreme southwest corner.

4. Also, referring to this same map, the BLM failed to show 34 square miles of Bureau of Reclamation withdrawals which bisect the area from Ashurst-Hayden Dam to Riverside along the Gila River. These withdrawals are associated with the proposed Buttes Dam and include the Middle Gila River Project (AR017239), the San Carlos Indian Irrigation Project (PL0141), power site (CL438), the Buttes Dam and Reservoir site (PL05316) and reclamation application (A6264). Prior to building Buttes Dam, the railroad would have to be relocated as would private landowners that live in the path of the proposed lake. These withdrawals are included in two proposed Special Management Areas (SMA's) designated as the Middle Gila River Cultural Resources Management Area and the Gila River Riparian Management Area. On page 27, the BLM admits that implementation of these SMA's could only be done with the cooperation of the agency that manages the withdrawals. In other words, the BLM does not now have management authority over these lands which again supports our comment (No. 3) above.

5. Lastly, the Alternative C boundary of the White Canyon Management Area would be enlarged by the addition of 64 square miles of land under Alternative B (p. 51). This proposal makes little sense to us as less than two square miles of this land is BLM land; the remaining 62 square miles is state and private land.

In summary, ASARCO feels that Alternative B is an unworkable management plan for the proposed White Canyon Resource Conservation Area and asks that Alternative A (multiple use) be adopted for this important mineral rich area.

Sincerely,

N. A. Gambell
Technical Services
Administrator

31

Pima County Open Space Committee
c/o Whittell Trust
300 E. University, #221
Tucson, AZ 85705

28 April 1988

Arthur E. Tower
Phoenix Resource Area
Bureau of Land Management
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

RE: Comments on the Phoenix Resource Area Draft RMP/EIS

Dear Mr. Tower:

The Pima County Open Space Committee is in the final stages of preparing a long-term open space plan for eastern Pima County. Many of the open space protection ideas formulated by the committee rely on the continued open space character of Bureau of Land Management property in Pima County.

The proposed Baboquivari and Silverbell Resource Conservation Areas are important to Pima County's long-term open space needs. The Tortolita Mountains Cooperative Recreation Management Area is also important as is the lease to Pima County of the BLM parcels in the Tucson Mountains adjacent to and near Tucson Mountain Park and Saguaro National Monument.

The continued protection of the open space character of BLM parcels within the outlying mountain ranges of Pima County such as the Las Guijas and Sierrita Mountains is needed to meet the future open space/recreation needs of an increasing population in these outlying areas twenty or thirty years from now. A BLM exchange for State Lands in the Cerro Colorado Mountains to establish a core area of federal control would be very useful for these same reasons. Clearly, having these sites remain in Bureau of Land Management ownership versus State or private ownership greatly enhances their permanent open space quality, whether for recreation use, asethetic values, etc.

31-1 Recognizing that BLM has a limited amount of trade land available to structure the RCA's outlined in your plan, portions of the boundary of the Silverbell RCA could be set back to ensure that the relatively small acreages of other core mountain areas are retained in or transferred to BLM ownership. This is a small trade-off now for what would be of considerable value in later years when open space/recreational needs in the vicinity of areas such as the Sierrita and Las Guijas Mountains are dealt with in final detail. The crucial role BLM has played in the formation of Tucson Mountain Park and Tortolita County Park will be just as essential in these outlying areas some day. Thank you for considering these comments.

Sincerely yours,

William G. Roe, Chairman
Pima County Open Space Committee

31-1. The BLM's long-term management goals are to consolidate public land ownership in the Baboquivari and Silver Bell Resource Conservation Areas. Land identified as possessing important resource values (wildlife, plant, riparian, recreation or scenic) would have a high acquisition priority. Such land is near the core mountainous areas named in the comment.

32

SIERRA CLUB

Grand Canyon Chapter · Arizona

PALO VERDE GROUP
7102 E. Oak St. #8
Scottsdale, Arizona 85257
April 27, 1988

Mr. Arthur Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 W. Deer Valley Rd.
Phoenix, Arizona 85027

Dear Mr. Tower:

The Palo Verde Group Conservation Committee has reviewed the draft Resource Management Plan and EIS for the Phoenix Resource Area. We would like to submit these brief comments for the public record.

We are generally in agreement with the BLM's goals and proposed actions as expressed in this document. The blocking up of BLM holdings within selected areas of high scenic, recreational, biotic, and cultural values is an especially wise move which will have a beneficial effect on public land management for many years to come. The creation of several Areas of Critical Environmental Concern (ACEC's) is also to be applauded, indicating that the BLM is ready to not merely manage but to aggressively defend the unique and sensitive places under it's care.

32-1 In general, we prefer Alternative C to the preferred alternative B because it places larger areas within the various protective categories. The Perry Mesa and White Canyon ACEC's are significantly expanded under Alternative C, as are the Baboquivari, Silver Bell, and Tanner Wash Resource Conservation Areas (RCA's). But we cannot support Alt. C in it's entirety because it also reduces the size of the White Canyon RCA and designates an additional utility corridor right through the sensitive archeological zones on Perry Mesa. We oppose both moves, and find it regrettable that Alt. C mixes proposals to enhance protection of the environment with other proposals that tend to undermine it. We are also concerned about the change in status for the Picacho Mountains under Alt. C, from an RCA to a CRMA (Cooperative Recreation Management Area). We believe that management for the Picachos should benefit desert tortoise populations and maintain the existing wilderness values. Intensive recreational use or development should not occur if it will interfere with those primary goals.

We strongly support the proposed restriction of ORV use throughout the Resource Area to existing roads and trails, and we encourage you to develop educational and enforcement programs which will help transform this proposal to an effective reality.

32-1. The proposed RMP recommends that the utility corridor in the Black Canyon area should follow the draft RMP/EIS Alternative B placement, primarily to reduce visual impacts caused by new development.

The status of the Picacho Mountains in the proposed RMP would be as described in Alternative B of the draft RMP/EIS except that additional state land would be identified for acquisition and, upon acquisition, become part of the RCA and desert tortoise management area.

We also support Recreation Management Area designations for Hell's Canyon and the Coyote Mountains pending any Congressional action on a BLM wilderness bill. These are both important scenic and recreational areas close to major metropolitan zones, and special management focusing on those values in entirely appropriate.

32-2 White Canyon is an area of special interest to many of our members. While we were happy to see the proposed ACEC status under the preferred alternative, the boundaries and size of the proposed unit are entirely inadequate. The expanded unit under Alternative C is preferable in every way and has our enthusiastic support. We also urge you to recognize that there is an equal (possibly greater) amount of acreage in the Tonto National Forest, immediately north of the BLM holdings, which also contains important riparian habitat, cultural resources, and wilderness characteristics in upper White Canyon and in adjacent Wood Canyon. The BLM/National Forest boundary cuts arbitrarily through the center of this splendid natural area. We believe that a cooperative management approach is called for, with both agencies aware of the extent and quality of the area's resources and working together to protect them.

Thank you for this opportunity to comment on the draft RMP/EIS.

Sincerely,

Tom Wright

Tom Wright, Conservation Chairman
Palo Verde Group
Sierra Club

32-2. The proposed RMP recommends adoption of the draft's preferred alternative (Alternative B) boundaries for the White Canyon ACEC as the most feasible ACEC management unit considering other multiple uses of the area. The BLM would cooperate fully with the Forest Service when developing an activity plan for the area.

33

United States Department of the Interior
NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

DES 88/0002

L7617(WR-RP)

April 19, 1988

Memorandum

To: Manager, Phoenix Resource Area, Bureau of Land Management

From: ACTING Regional Director, Western Region

Subject: Review Comments on the Draft Phoenix Resource Management Plan and Environmental Impact Statement, Phoenix, Arizona (DES 88/0002)

We have completed our review of the Bureau of Land Management's Draft Phoenix Resource Management Plan/Environmental Impact Statement and have the following comments.

33-1 1. The boundaries shown for Saguaro National Monument need adjustment on the BLM's South Central Portion Map. Inaccuracies remain despite discussions in 1986 with BLM staff to make changes. Maps are enclosed to show the necessary changes for both districts. For Tucson Mountain Unit, the National Park Service landownership and administrative boundary are larger than indicated by BLM. At the Rincon Mountain Unit, the U.S. Forest Service boundary shown within the Monument does not exist now.

We are also including a map to show the correct boundary for Coronado National Memorial. Although the Memorial is not directly affected by the Phoenix Resource Management Plan, this information will help the BLM correct Coronado's boundary on its South Central Portion Map.

33-2 2. There are two parcels of BLM land next to the Tucson Mountain Unit, Saguaro National Monument, that interest us. The BLM has designated these scattered parcels for disposal possibly through exchange. Either State or private ownership could result in uses that might be detrimental to the Monument's resources. One parcel (T. 13 S., R. 11 E., NE 1/4, Sec. 29) contains and endangered plant, the Tumamoc globeberry, and the second parcel (T. 13 S., R. 12 E., SE 1/4, Sec 9) is an area of local controversy about mineral entry.

33-1. The South Central Portion map reflects our understanding of the National Park Service (NPS) boundaries of land under NPS ownership in 1986. The NPS map shows the park boundary limits established by Congress, within which the NPS would attempt to acquire any non-public land.

The U.S. Forest Service boundaries shown within the Rincon Mountain unit and the incorrect Coronado National Memorial boundary are errors reflected in the base map used to develop the three BLM maps.

Maps printed in the future will reflect the NPS-suggested changes for all three areas.

33-2 We would like to have these two parcels transferred to the National Park Service, an action that is endorsed by environmental groups. In the past, BLM has generously transferred some adjacent parcels to Saguaro National Monument. Your consideration of another transaction would be appreciated.

In summary, we commend the Bureau of Land Management's efforts to consolidate landownership and create Resource Conservation Areas, which will allow the agency to have more manageable units. If you have any questions about these comments, please contact Jim Laney, General Superintendent, Southern Arizona Group, at FTS 261-4959.

Sincerely,

for Stanley T. Albright
Regional Director, Western Region

Enclosures 3

33-2. In the proposed RMP these parcels have been identified for retention in public ownership pending Congressional action to expand the monument's boundaries.

Blue Grama

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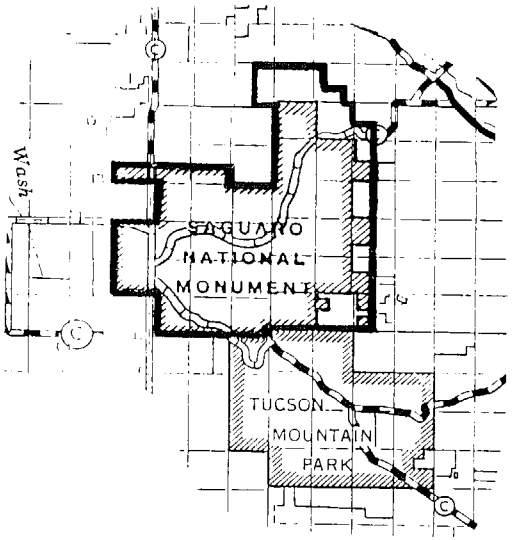
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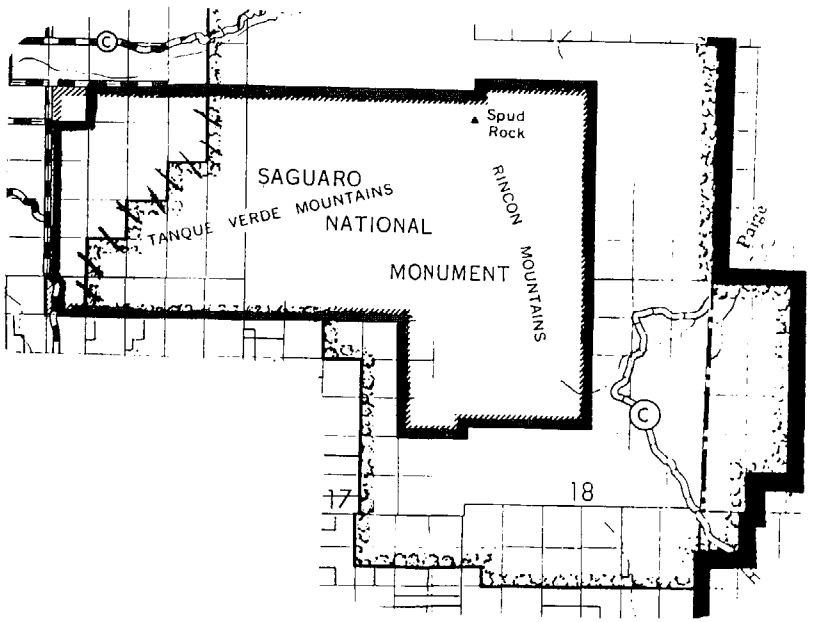
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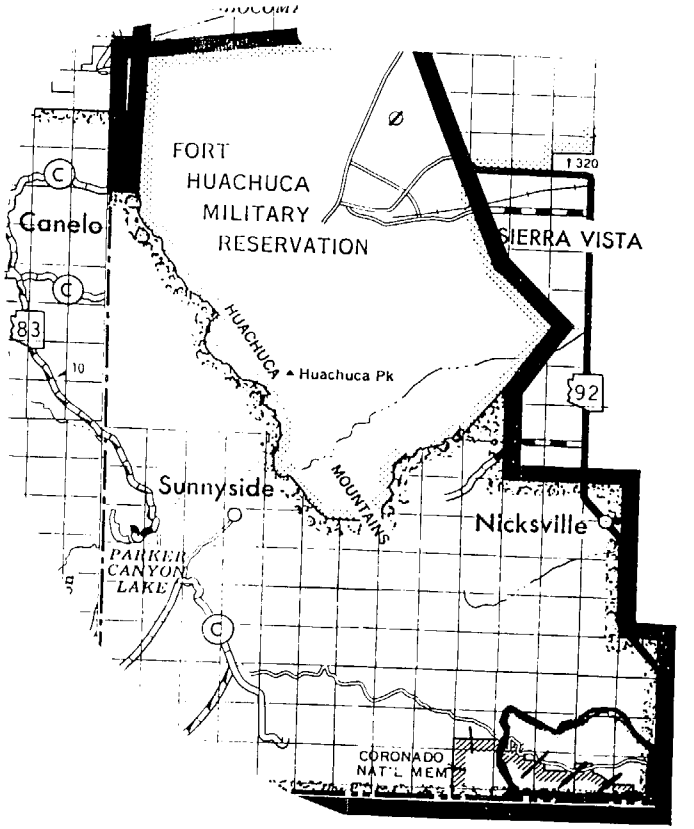
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Nicksville
PARKER
CANYON
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NAT'L MEM

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FRANCES W. WERNER, Tucson
THOMAS G. WOODS, JR., Phoenix
PHILLIP W. ASHCROFT, Eagar
GORDON K. WHITING, Klondyke

Director
TEMPLE A. REYNOLDS

Deputy Director
DUANE L. SHROUFE

34

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

April 29, 1988

Mr. Arthur E. Tower
Area Manager
Phoenix Resource Area
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

The Arizona Game and Fish Department has reviewed the draft Phoenix Resource Management Plan (RMP) and Environmental Impact Statement (EIS), and we respectfully provide the following comments.

34-1 The RMP document, as we understand, replaces the three Management Framework Plans (MFPs) which preceded this process. We also note that the RMP is intended to meet the requirements of the Federal Land Policy and Management Act (FLPMA). It is the Department's belief that the document lacks enough detail to meet FLPMA guidelines for wildlife resources. The previous MFPs contained specific standards and guidelines to attain wildlife resource objectives. The current RMP document is completely lacking in similar content.

34-2 We believe a primary issue relative to this draft RMP is Land Tenure Adjustment. The alternatives considered within the RMP do not present any options for this issue. Therefore, we believe the four alternatives considered do not meet National Environmental Policy Act (NEPA) requirements. Though alternatives A and D provide extreme baseline comparisons (no action and total disposal alternatives), alternatives B and C reflect little substantive difference in land management decisions. The consequences of addressing planning issues (i.e. land tenure adjustments) in dissimilar ways is not addressed, as required under NEPA. Discounting alternatives which retain lands in Apache and Navajo counties, because of potentially complex land trades needed to block up lands (page 41), does not appear justified, when compared to recent BLM land exchanges.

The guidelines for land disposal provided for in FLPMA are cited numerous times throughout the document--tracts difficult and uneconomical to manage. However, with the exception of unpatented mining claims (page 15) there is little mention of

34-1. The RMP does replace older MFPs. However, as stated on page 1 of the draft RMP, "MFP decisions that still have merit are being carried forward and are incorporated into this RMP."

Refer also to the General Response to comments.

34-2. An option for retaining land in Apache and Navajo Counties and the consequent impact on resolving the land tenure adjustment issue is analyzed in Alternative A of the draft RMP/EIS. As discussed on page 41 of the draft RMP/EIS, other alternatives which would create public land blocks in the two counties through exchanges were also considered .

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those policies relative to retention of lands in public ownership, where endangered species and high natural resource/wildlife values are present. Further, though checkerboard lands may present inefficient land management (page 125), they may still provide effective land management. When significant resource values are present (i.e. Little Colorado River spinedace; paperspined cactus; potential black-footed ferret occurrence/reintroduction sites; high-value pronghorn habitat), even inefficient land management is preferable to no lands in federal management.

34-3 Though blocking up lands in Apache and Navajo counties does not appear feasible, at this time, retaining those checkerboard tracts with the highest resource values, now, may lead to future opportunities. The first sentence on page 164 provides the logic and summary for these arguments, but from the opposite perspective. Changing only one word and adding two defines the issue..."therefore, over the short term, land retention may negatively impact some resource (BLM efficient management) that over the long term other resources (wildlife) would be greatly benefited". We again suggest that the Bureau consider an alternative which would allow for blocking up or consolidating of highest resource value public lands in Navajo and Apache counties.

Further, a prime example of where the Bureau did not consider the true impact of land consolidation favoring State land and private ownership is in the assessment of the Preferred Alternative (B), and others, as it relates to impact on pronghorn habitat. It is stated in several places that BLM administration of pronghorn habitat accounts for only seven percent of the total habitat in the assessment area (pages 117 and 148), and the environmental consequences conclusion for pronghorn states that only "two percent of the total habitat in Apache and Navajo counties would eventually be abandoned as a result of subdivision development" (page 148). This, in our opinion, grossly underestimates the impact of this proposed liquidation of public lands in the
34-4 area. The Department's Geographic Information System (GIS) records indicate that BLM administration of pronghorn range in the project area (Units 2A, 2B, 2C, 3A, 3B, 4A, 4B, less USFS lands) accounts for 10 percent, State Trust 28.2 percent, and private 56.8 percent. It is greatly feared that the loss of this 10 percent of BLM-administered pronghorn habitat will facilitate the future development in the area, if not short term, then long term. Not only will this 10 percent loss of public pronghorn habitat represent a potential loss of habitat, but far greater than two percent of the total ownership will be potentially lost to future development. As is, the current land ownership patterns serve as somewhat of a deterrent to development and ensure some kind of maintenance of open space.

34-3. Impacts to all the resource values mentioned in the comment were analyzed in all alternatives. Refer to Chapter 4 of the draft RMP/EIS.

Alternatives for consolidating public land in Apache and Navajo Counties were considered but not carried forward for the reasons stated on page 41 of the draft RMP/EIS.

34-4. The Department's GIS record made available to the BLM shows 100,000 more public acres in the two counties than actually exist. In any case, it was the conclusion of the planning team that only a small portion of the exchanged public land would be developed in the long term and that the vast majority would continue to provide habitat for wildlife, including pronghorn.

34-5 Additionally, the lack of recognition of the resource value within Apache and Navajo counties (page 23) is clearly in error. For instance, the draft RMP appears to discount the value of the pronghorn habitat in Apache and Navajo counties which supports low or lower densities, accounting for 93 percent of the habitat (page 117). This habitat, despite low densities, still represents important habitat for pronghorn, even on a statewide scale. It must be emphasized that the density classes represent averages for relatively large acreages, and that considerable pronghorn populations inhabit these areas, though in a non-uniform distribution. The fact that resource values are discounted over much of the RMP area is further illustrated by the statement that "All disposal lies outside the RCAs (Resource Conservation Areas). The land is mostly scattered parcels exhibiting few or low natural resource values" (page 23). It has been the Department's contention that this is not the case, as the lands in Apache and Navajo counties hold considerable value for pronghorn, nongame (e.g. Ferruginous hawk), and T&E species (e.g. paperspine cactus). Yet another example of how the potential resource values of lands here have been discounted is evident on page 11, where it is stated that the "inventory conducted by the BLM and AG&FD has not identified any occupied (black-footed ferrett) areas or areas considered to be potential habitat (i.e. the presence of large prairie dog town complexes)," This survey is just now being completed, and numerous large prairie dog town complexes have indeed been located throughout the area. The PA would certainly preclude consideration of future potential habitat designation for black-footed ferrett.

Additional comments/information on species of special concern follow:

Desert Tortoise

34-6 The designation of a Special Management Area for management of desert tortoise and the development of an activity plan is an excellent approach for addressing tortoise issues. However, the Picacho Mountain SMA is too small and does not include important habitat on the adjacent lower mountain slopes and bajada. To insure long-term tortoise populations, BLM should direct its efforts toward the special management of greater acreage. This can be accomplished by seeking acquisition of the state land surrounding the Picacho Mountains and/or by placing special management designation on a larger block of contiguous BLM tortoise habitat. Including the desert tortoise as part of the Silver Bell Bighorn Sheep Management Area would be compatible with the goals for that area.

34-5. It was not the BLM's intent to indicate that low resource values equate to no resource values on land outside the proposed RCAs. No resource value was discounted during the development of the draft RMP/EIS.

The paperspined cactus is not a threatened or endangered species.

The results of the black-footed ferret inventory were not available to the BLM before the draft RMP/EIS was printed. The completed inventory identified 13 prairie dog towns meeting the criteria for potential black-footed ferret use. None of the towns was found to be occupied by ferrets.

34-6. Refer to responses 18-6 and 18-7.

Little Colorado River Spinedace

34-7 Disposing of any properties which provide habitat for a listed threatened species must be carefully scrutinized. The fact that BLM currently administers the only federal lands on Silver Creek increases the priority for maintaining federal presence along the creek. This presence provides the only opportunity to maintain the population that currently exists in Silver Creek. To abandon these properties, based on the supposition that the Silver Creek population will sooner or later be lost anyway (page 146), is derelict in BLM's responsibilities as imposed under the Endangered Species Act, and by BLM's internal policies. In addition, on the maps provided, public lands are indicated along the Little Colorado River in the vicinity of Woodruff. This is documented spinedace habitat, yet there is no mention of these lands in discussions on this fish.

Paperspined Cactus

34-8 Eliminating this special status species entirely from BLM management, through land tenure adjustments, should not occur. Retaining lands which include shared habitat values for this species with pronghorn is encouraged (i.e. the area between State Routes 77 and 377).

Tanner Wash ACEC

34-9 Expanding the boundaries of the Tanner Wash ACEC in the preferred alternative, to reflect the boundaries in Alternative C, would include additional potential habitat for the endangered Peebles Navajo cactus. Given the rarity and difficulty of accurately surveying for this species, BLM should consider all available options.

Waterman Mountain ACEC

34-10 Potential habitat for Tumamoc globeberry and Thornber fishhook cactus would be included within this ACEC, if the boundaries would reflect that in Alternative C. Documented occurrences of both species are within similar habitat from only a few miles from the expanded ACEC boundary.

34-11 In conclusion, the Department recognizes a major deficiency in the draft RMP/EIS in the land tenure adjustment issue. We recommend that the BLM give further consideration to an alternative for this issue, which addresses the high natural resource/wildlife values present in Navajo and Apache counties, and which can address BLM's objective for pronghorn management "to increase the capability of public land habitat to support pronghorn" and to ensure protection of other valuable resources, such as, the paperspined cactus.

34-7. The public land parcels near Woodruff are not listed by USFWS as being within the habitat area covered under the listing of Little Colorado River spinedace.

Refer also to response 22-3.

34-8. Ongoing research and inventory as well as a USFWS status survey for the species indicate that this cactus has relatively stable, federally protected populations in New Mexico which do not require listing as threatened or endangered. Recent inventory indicates that the paperspined cactus occurs in densities of up to 900 plants per square mile in portions of its habitat in Arizona. The known range of the plant in the RMP area covers approximately 720 square miles in Navajo County. Land use and development patterns in Navajo County would likely remain unchanged over most of this habitat regardless of ownership, with livestock grazing as the predominate use. Exchanges within the cactus' habitat would not be expected to affect the federal listing status of the species.

34-9. In the proposed RMP the boundary of the proposed Tanner Wash ACEC has been revised to include not only all known populations of the Peebles Navajo cactus but also the potential habitat thought necessary for eventual recovery of the species. See map 2-18 in this document.

34-10. Potential habitat for Tumamoc globeberry and Thornber fishhook cactus is found throughout the proposed Silver Bell Resource Conservation Area. No additional protection for these species would result by adopting the draft RMP/EIS Alternative C boundaries for the ACEC.

34-11. Refer to response 34-2.

One particular planning methodology proposed in this draft RMP, which is unique to BLM's current RMP planning effort, is the resource conservation area (RCA). The Department supports this effort to subdivide RMP areas into smaller, more manageable blocks, where specific resource issues or resource values can be emphasized and enhanced in the long term.

The Department recognizes the major effort that went into the development of this draft RMP/EIS, and appreciates the opportunities that we have had to review and provide comment. A separate list of comments specific to the draft document is attached.

Sincerely,

Duane L. Shroufe
Deputy Director

Arizona Game and Fish Department
Specific Comments on Draft RMP/EIS

Page 21, Figure 2-1, BLM Land Exchange Process

34-12 The RMP fails to discuss the Notices of Realty Action (NORA) currently being processed by Phoenix District.

Page 24, Issue 2, Alternative B

34-13 We recommend adding a sentence to specifically prohibit the development of a road to the Newman Peak communications site; access could be by helicopter.

Page 26, Table 2-3

34-14 Under the Appleton-Whittell ACEC, the implication of "...prohibit land use actions except as authorized by Research Ranch" suggests the possibility of public access closure, which the Department must oppose.

Page 27

34-15 Special Management Areas (SMAs) should include language for cooperative planning and management with the Arizona Game and Fish Department. AGFD should be a cooperator for Coordinated Resource Management Plans (CRMPs), as well.

Pages 28-29, Table 2-4

Coyote Mountains Recreation Management Area. We recommend to specifically add hunting as a recreation value. AGFD should be a cooperator in developing the access plan.

34-12. Routine management practices occurring on a day-to-day basis are not relevant topics for discussion in an RMP. NORAs are only one part of an administrative action in carrying out decisions made through existing Bureau planning. AG&FD receives and has opportunity to comment on all land exchange NORAs issued by the Phoenix District.

The role of NORAs in the BLM land exchange process is illustrated in Figure 2-1 on page 21 of the draft RMP/EIS.

34-13. Refer to responses 29-6 and 29-7.

34-14. The AG&FD will be consulted if closure of public access to BLM-administered land is contemplated.

34-15. The AG&FD has always been an important contributor in the development of BLM activity plans. We expect the close cooperation to continue in all areas of mutual interest and responsibility.

Agua Blanco Ranch Multiple Resource Management Area and Cocoraque Butte-Waterman MRMA. AGFD should be included in development of the access plan. Also, hunting should specifically be included as a valid activity.

Silverbell Desert Bighorn Sheep Management Area. AGFD should be the primary cooperator, and named as such, for development of the activity plan. Also, we recommend including desert tortoise and Harris' hawk as key species in this area.

Picacho Mountains Desert Tortoise Management Area. The Department supports Alternative B for communications site development, also the ACEC designation under Alternative B. We compliment the Bureau for recognizing the high-value riparian and native plant values. However, we are concerned about the implied loss of hunting recreation opportunities on 2,341 acres associated with the Appleton-Whittell ACEC. The Department opposes a hunting closure of these lands.

34-16 We are somewhat puzzled by the vast array of Special Management designations, and what they mean, under Alternative B. The document never explains what is meant by certain terms, such as "...manage to enhance recreation values" and "...manage for conservation values." We are particularly concerned about the absence of any reference to hunting recreation and active cooperation with the Arizona Game and Fish Department.

34-17 We specifically do not understand the desert tortoise emphasis in the Picacho Mountains. The majority of prime desert tortoise habitat in the Picacho Mountains is at elevations below BLM holdings. Conversely, the Silverbell-West Silverbell-Ragged Peak area is high-quality desert tortoise habitat, with a viable population that would benefit from active management efforts.

34-18 We consider it ironic that BLM proposes to "protect" a tortoise population already impacted by construction of the Central Arizona Project (CAP) Canal, and on a mountain with minimal to no livestock grazing of lands under BLM control. The Silverbell Complex, in contrast, would benefit tremendously from management efforts by the BLM. Therefore, we strongly recommend the designation of the Silverbell area as a sheep and tortoise Management Area.

34-19 We also question the closure of any roads in the Picacho Mountains which access existing AGFD catchments.

Page 31, Issue 5 - Recreation Management

34-20 Table 2-4 does not describe the management goals and planned actions in any detail. Again, hunting is never mentioned, nor is the commitment to cooperate with AGFD ever mentioned. We strongly recommend significant expansion of the document to clearly explain the goals and planned actions for all SMAs.

34-16. Hunting is prominently mentioned as an important recreational use in Chapter 3 of the draft RMP/EIS. Recreation values are those discussed in the Recreation Use section of Chapter 3 in the draft RMP/EIS. Conservation values with reference to cultural sites are defined in the Glossary and in Appendix 6 of the draft RMP/EIS.

34-17. See responses 18-2 and 18-7.

34-18. See response 18-6.

34-19. AG&FD access to service catchments is considered a necessary function and would not be affected by public access closures.

34-20. Since hunting is an important recreation use of public land (see Chapter 3 Recreation Use section), the activity is expected to continue. During the development of activity plans detailing the methods for achieving the identified management goals for ACECs and special management areas, the AG&FD would be consulted if any hunting restrictions are discussed. The close-working relationship between the BLM and the AG&FD is expected to continue in all areas of mutual interest.

Page 42, Land Tenure Adjustments

34-21 We strongly question the conclusions concerning the ability to retain, or increase, BLM holdings in the Sierrita and Las Guijas Mountains. We believe losses of wildlife habitat for desert mule deer and javelina will be significant in the Sierrita and Cerro Colorado Mountains. A significant white-tailed deer population will be sacrificed via exchange of the Las Guijas Mountains.

34-22 Also, acquisition of the Tortolita Mountains, but disposal of the lower bajada holdings and the Suizo Mountains, will result in significant loss of upland Sonoran desert habitat, typified by ironwood (Olnea tesota), palo verde (Cercidium spp.), mesquite (Prosopis spp.), and saguaro (Carnegia gigantia). Associated wildlife include concentrations of Gambel quail, javelina, desert mule deer, desert tortoise, and Harris' hawk. The Arizona Game and Fish Department is becoming increasingly more concerned with BLM disposal of lands which exhibit high quality Sonoran desert values.

The following AGFD wildlife water catchments would be removed from public lands:

- Owl Head Mountain #5 (AGFD #103) NENW Section 1, T8S, R11E
- Owl Head Mountain #9 (AGFD #107) SWSE Section 21, T8S, R12E

34-23 The following catchments have access roads which we require for maintenance:

- Picacho Mountains #2 (AGFD #213) Section 21, T8S, R9E
- Picacho Mountains #4 (AGFD #688) Section 10, T8S, R9E (SW1/4)
- Picacho Mountains #5 (AGFD #689) SE1/4 Section 26, T8S, R9E

Page 53, Map 2-9

Horsethief Basin Lake is wrongly labeled "Horseshoe Lake."

Page 73, Map 2-25

34-24 The same comment as for page 53, plus the legend denotes a "Recreation Mgmt. Area" that is nowhere to be found on the map.

Page 118

34-25 What is the criterion for "High Density Javelina Habitat"? The entire area between the Bradshaw Mountains and S.R. 74 to the south and the map boundary to the west is good javelina habitat. Wildlife Management Unit 20B receives considerable use by archery and general season javelina hunters. The depiction on the map is misleading, at best.

Page 120, Javelina

Highest density areas for javelina may not have the greatest need for management emphasis. As mentioned for the map on page 118, javelina hunting is very important outside areas marked as "High Density."

34-21. Only a small fraction of the land in the three areas is public land. Little change in current land use is expected as a result of exchange. Consequently, we do not expect exchange of the public land in these areas to affect wildlife significantly.

34-22. The proposal to exchange public land outside the identified Resource Conservation Area (RCAs) for non-public land within the RCAs would not result in a net loss of the public values mentioned in the comment. In the White Canyon and Silver Bell Mountains RCAs, for instance, the potential exists for the BLM to acquire significantly more of these values than are given up in exchange.

34-23. See response 34-19.

34-24. The recreation management area is the Hells Canyon Recreation Management Area. The area is shown on Map 2-25 in the draft RMP/EIS, although slightly obscured by the shading used to denote the burro management area. The area is more clearly shown on Map 2-25 in this document.

34-25. The map depicts areas where the highest densities of javelina are expected. The reference used was the AG&FD's 1985 Big Game Distribution Map.

Page 121, Table 3-16

34-26 The fishing days for Picacho Reservoir and Lake Pleasant appear woefully inaccurate, as do the hunting days at Picacho. An explanation of how these numbers are derived may clear this up.

Page 138, Table 4-6

34-27 Days for Picacho areas noted above and Pleasant have greatly increased; it's not clear how these numbers have changed, or why.

Page 148, Effects on Wild, Free-Roaming Burros

34-28 Management of burros to increase population levels to halt the population decline is questionable management. Burros are not wildlife, but are feral animals which can cause significant adverse impact to wildlife habitat. There are plenty of areas in the western United States where people can see relic herds without the need to risk overpopulation and abuse of public land.

Page 149, Table 4-8

34-29 Again, the fishing and hunting days for Picacho Reservoir and a tenfold increase in fishing at Pleasant is not clear.

Page 173, Appendix 1

34-30 We note the inclusion of lands in T11N, R3W in the table of land meeting FLPMA Sales criteria, but find no mention of resources or impacts to those resources in the draft RMP. Without those, adequate analysis of impacts is impossible.

34-26. The figures listed in the draft RMP/EIS on page 121, Table 3-16, are visitor use numbers for visits to public land on or near Picacho Reservoir and Lake Pleasant. These figures are not total visitor use figures for fishing or hunting visitor use days at either reservoir.

34-27. The figures described in the draft RMP/EIS on page 138, Table 4-6, indicate increased visitation to public land near Lake Pleasant due to long-term increases in the population of Phoenix and the north valley as well as increased public use of the enlarged and improved Lake Pleasant Regional County Park. The figures describe only visits on or to public land and do not represent total visitor use at the reservoir. The figures for Picacho Reservoir are unchanged from those presented in Chapter 3, Table 3-16. The described fishing and hunting visits are those attributable only to public land, not the entire Picacho Reservoir.

34-28. Public Law 92-195 makes the BLM responsible for the welfare and protection of unclaimed and unbranded burros found on public land. The management of burros on public land is accomplished at the minimum level necessary to assure the herd's free-roaming character, health and self-sustaining ability.

34-29. The figures in the draft RMP/EIS on page 149, Table 4-8, describe a situation where there would be no public land near Picacho Reservoir. Accordingly, fishing and hunting days attributed to public land at Picacho Reservoir would be zero. Under Alternative B, much of the land encompassing Lake Pleasant Regional County Park would be public land used by the county under a Cooperative Recreation Management Agreement. Visitor use of this park land would be considered visits to public land; thus visits to public land in the Lake Pleasant Resource Conservation Area would increase under Alternative B. Presently, no fishing activity attributable to use of public land occur on Lake Pleasant. Under Alternative B, a sizable increase in the use of public land for fishing activity would be anticipated due to an increase in public land areas resulting from BLM-state exchanges.

34-30. Parcels listed in Appendix 1 of the draft RMP/EIS are those that meet the criteria stated in the Federal Land Policy and Management Act (FLPMA) for public land sale. These parcels are identified for disposal and have been evaluated to determine whether they contain values which would preclude disposal, either by exchange or sale. If the AG&FD is aware of values on the parcels listed which might affect a disposal decision, the BLM would appreciate receiving this information.

35

SIERRA CLUB

Grand Canyon Chapter · Arizona

RINCON GROUP

April 29, 1988
117 N. 2nd Avenue
Tucson, AZ 85705
792-2690

Arthur E. Tower
Manager, Phoenix Resource Area
Bureau of Land Management

Dear Mr. Tower:

Thank you for the opportunity to comment on the draft Phoenix Resource Management Plan and Environmental Impact Statement.

I must compliment the RMP team for the plan's emphasis on special management of the scenic, recreational, biotic, and cultural values on public lands. These are important resources for both the health of the land and the health of Arizona's economy, as the state's population grows and our tourism industry expands.

For the most part, we support the plans laid out under Alternative C. It gives significantly better protection to sensitive plant and animal populations, and by extension, to the ecosystems they require. It also does a better job of protecting some other values. Especially praiseworthy are the Alternative C boundaries of the White Canyon and Perry Mesa/Larry Canyon ACECs. We also strongly support the proposed R&PPA transfer of BLM lands in the Tortolita Mountains.

We would, however, like to see some changes in Alternative C:

35-1 1. The Waterman Mountains ACEC should encompass the Pan Quemado range. The ACEC is apparently meant as a refuge for the Tumamoc globeberry, which clearly has habitat extending through the Pan Quemado area. More significantly, the Pan Quemados may also support a population of Thornber's fishhook cactus, and would appear from the ground to be good desert tortoise habitat. Thus, a larger ACEC could provide protection for all three species.

35-2 2. The Silver Bell Desert Bighorn SMA should also be managed for desert tortoise. It contains far more tortoise habitat than the Picacho Mountains SMA proposed in Alternative B, and with acquisition of state and private holdings between

35-1. The Waterman Mountains ACEC encompasses populations of the endangered Nichol Turk's head cactus. Habitat for Tumamoc globeberry and Thornber fishhook cactus is found throughout the proposed Silver Bell RCA. Adding Pan Quemado to the ACEC boundary would not add significantly to protection efforts for any of the three species.

35-2. Refer to response 18-6.

the Silver Bells and Ragged Top, it creates a well-defined and manageable area of prime tortoise habitat. Management should include an end to livestock grazing, as cattle are a principle cause of turtle mortality (as mentioned on p. 117); closure of most existing roads and trails, to prevent tortoise collecting (p.117) and disturbance of bighorn sheep (p.115); and closure to new mining claims, to prevent bighorn disturbance, heavy human use, and construction of new access roads (pp.115 & 117).

3. The Picacho Mountains should be managed as a desert tortoise SMA, as proposed in Alternative B, and not as a CRMA. Recreation-oriented management would have significant damaging effects on the tortoise population (p.155). Management should include an end to lifestock grazing, and cooperative management with the State Land Department for the health of the tortoise population on adjacent bajada areas.

4. Alternative C should include the Alternative B proposal of R&PPA transfers to Pima County of Saginaw Hill and Tucson Mountain Park Extension (p.31).

In addition to those particulars, we have some comments on the document as a whole:

35-3 5. The Yuma Mine property (T13S, R12E, S9) should be closed to new mining claims. Efforts should be made to retire the existing claims, and the land should be transferred through R&PPA to the U.S. Park Service. Similar closure and transfers should be done for public lands in Sections 28, 33, and 34. All these parcels are apparently, and inappropriately, listed for disposal in the RMP (p. 174).

6. The discussion of Minerals Management (p.16) should include a section on closure of land to new mineral entry. True multiple use management must include a willingness to exclude, in some areas, uses which are incompatible with other uses or with existing and desired values.

35-4 7. Management plans for values that conflict with grazing, such as riparian habitat or desert tortoise populations, should include explicit discussion of reducing or retiring grazing allotments and/or construction of cattle exclosures.

35-5 8. The South Bradshaws and Ragged Top WSAs should be included in the table on p. 184.

35-3. Refer to response 33-2.

35-4. When the approved RMP is implemented, activity plans will be developed detailing the methods for achieving the identified management goals for ACECs and special management areas. In compliance with NEPA, all appropriate measures will be taken to mitigate impacts to important values in each area.

35-5. The South Bradshaws East and Ragged Top WSAs were studied in the Arizona Mohave Wilderness Draft Environmental Impact Statement, not the Phoenix Wilderness Final EIS.

35-6 9. The "Little long-nosed bat" (p. 11 & 190) should be referred to as "Sanborn's long-nosed bat". It should probably also be upgraded to status C-1, as USFWS has officially proposed to determine Endangered status for it (Federal Register, July 6, 1987, pp. 25271-25274).

35-7 10. A blanket policy of full fire suppression (p. 19) is not appropriate. Wildfires should be allowed to burn when not a human hazard, as they can contribute significantly to natural ecological processes. In particular, they can benefit wildlife by enhancing the forage available.

35-8 11. Restricting vehicles within SMAs to "existing roads and trails" (pp. 28-30, 37-39) is not an adequate prescription. Past off-road vehicle use has, in many places, created unneeded and inappropriate trails that would be "grandfathered" in under that directive. In addition, few areas have had detailed inventories done on their roads and trails, so there is no standard of "existing" with which to determine that a road or trail is new. The only workable management tool to limit undesireable vehicle use is to close all roads and trails unless they are signed open (Off-Road Vehicles on Public Land, Council on Environmental Quality, 1979; "Impacts and Management of Off-Road Vehicles", USGS, 1977). This was considered and rejected for the Phoenix District as a whole (p.42), an appropriate measure given the scattered and diverse nature of the lands involved. It absolutely **should** be implemented, however, on SMAs and ACECs, as they are well-defined and manageable parcels with identified values in need of protection.

12. Tables describing the ACECs and SMAs should also list the grazing allotments associated with those areas. This would allow cross-reference to Appendices 2, 3, and 4 (pp. 175-184) and to other documents on range condition and management.

Yours,

Dale S. Turner
Conservation Chair
Rincon Group

35-6. The Sanborn's long-nosed bat has been removed from the Phoenix Resource Area's special status list. The species is not known to inhabit areas under our administration.

35-7. Activity plans developed for ACECs and special management areas would identify areas where less than full suppression of fires or prescribed burning would be beneficial in achieving the management goals described for the areas.

35-8. Site-specific activity planning will evaluate ORV signing needs necessary to achieve ORV management goals. The use of ORV signing would be restricted to marking major entry points administered by the BLM and other specific areas (ACECs, special management areas). In high visibility and use areas, signing may be needed to acquaint users with ORV designations and describe where visitors can obtain additional information. Intensive signing is anticipated only in areas with identified management concerns (ACECs and special management areas). Signing, public education efforts, a visitor use map (with ORV policies described) and BLM ranger patrols should be adequate to ensure compliance with ORV management policies.

36

THE WILDLIFE SOCIETY, ARIZONA CHAPTER
P.O. Box 11135
Phoenix, AZ 85017

26 April 1988

Mr. Arthur E. Tower
Phoenix, Resource Area Manger
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

The Wildlife Society (TWS) appreciates the opportunity to comment on the Draft Phoenix Resource Management Plan and Environmental Impact Statement (RMP). We commend the Bureau of Land Management on the proposed designation of seven Areas of Critical Environmental Concern (ACEC). Our main comments on the RMP involve requests for ACEC boundary modifications; impacts to Federally threatened and endangered (T&E) species, riparian habitats, and Sonoran Desert upland bajadas; and the inadequate management prescriptions. Please consider the following comments.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

1. TWS strongly supports ACEC designations for Baboquivari Mountains, Waterman Mountains, White Canyon, Perry Mesa, Larry Canyon, Tanner Wash, and Appleton-Whittell. We request, however, a more detailed analysis of areas that were rejected for this designation.

36-1 2. We urge implementation of Alternative C for Perry Canyon ACEC and the expansion of the boundaries to include T. 10N., R. 3E., Sections 10, 11, and 12. This expansion will allow acquisition of *Gila intermedia* and riparian habitat. This riparian habitat includes cienega and deciduous broadleaf riparian forest components.

36-2 3. We also urge implementation of Alternative C boundary designations for the Waterman Mountains and Tanner Wash to maximize known and potential special status species habitat. Sections T. 18N., R. 21E., Section 11 and 15 contain a candidate category 1 endangered plant and should be acquired as part of the Tanner Wash ACEC.

36-1. Refer to responses 22-4 and 22-5.

36-2. Refer to responses 3-2 and 29-12.

36-3 4. TWS requests that the Black Canyon RCA boundaries be modified to include T. 11N., R. 2E., E 1/2 Section 22, E 1/2 Section 27, and E 1/2 Section 34. In addition, acquisition of T. 12N., R. 3E., E 1/2 Section 6, and T. 13N., R. 3E. SW 1/4 Section 31 would ensure federal protection of the entire perennial stretch of Ash Creek.

THREATENED AND ENDANGERED SPECIES

36-4 5. Implementation of this RMP constitutes a major federal action and therefore requires consultation with Fish and Wildlife Service under Section 7 of the Endangered Species Act for T&E species affected by this action. Impacts to affected T&E species are inadequately described in this document and should be analyzed in a separate biological assessment. Both positive and negative impacts will result from land disposal and acquisition and from changes in land management practices. In addition, BLM should confer with FWS regarding impacts to Federally proposed species.

36-5 6. This RMP is an appropriate vehicle to define Recovery Plan objectives and actions for T&E species affected by this action. BLM should use this planning document to meet and enhance the objectives of existing recovery plans.

36-6 7. TWS is concerned that disposal of land with candidate species listed in Appendix 9, without proper assessment, may necessitate listing of those species later. This conflicts with BLM policy to "identify habitat improvement or expansion efforts required to downlist or delist a species." BLM should strive to retain lands containing special status species within Federal ownership.

36-7 8. The bald eagle recolonization of the Agua Fria will be greatly affected by BLM management of riparian habitats in Black Canyon and Lake Pleasant RCAs. Bald eagle nesting trends should be discussed in this document and BLM should consider the entire drainage as a single ecological unit when prescribing management for this area.

36-8 9. BLM should reconsider the proposed disposal of Little Colorado River spinedace habitat on Silver Creek. This is the only Federally owned parcel of land along this creek below the town of Silver Creek. This land should be retained in Federal ownership to ensure the continued survival of this species and allow for future recovery efforts.

36-9 10. Disposal of land containing populations of paperspined cactus would lead to the decline of this species, however, the RMP states that "... most of the populations occur in New Mexico and habitat loss in Arizona is not expected to affect its status." We question whether this habitat disposal is an insignificant impact to this species. In Arizona, 43 occurrences are

36-3. Refer to responses 29-11 and 29-12.

36-4. Refer to response 12-1 and the General Response to Comments on Section 7 Consultation.

36-5. Recovery plan objectives are incorporated into the management goals and/or planned actions for ACECs and special management areas recommended in the proposed RMP.

36-6. The final decision to dispose of land with candidate species rests upon the results of environmental assessments made when a specific disposal action is proposed. All environmental values are considered in the assessment, including those not considered issues in this RMP/EIS.

36-7. The U.S. Fish and Wildlife Service, which administers compliance with the Endangered Species Act, agrees with the BLM's assessment of the alternatives' impacts to the bald eagle in the Agua Fria River area.

36-8. Refer to response 22-3.

36-9. Refer to response 34-8.

36-9 documented in the state at 16 localities, 6 of which are on BLM land. The remaining 10 occurrences of the paperspined cactus are on State and private land receiving no formal protection. These 6 occurrences should be retained in Federal management to avoid the future need to list this species.

RIPARIAN HABITATS

36-10 11. TWS considers riparian habitats to be the most endangered habitats in Arizona and is concerned with the disposal of riparian habitats from Federal ownership through several of the RMP alternatives. BLM is required to comply with Executive Orders 11988 and 11990 and the BLM National Riparian Policy which require that riparian areas be retained in federal ownership unless disposal is in the public interest. This document has not adequately shown that the proposed riparian habitat disposal is in the public interest. TWS urges BLM to reconsider disposal of riparian habitats and to strive to place additional acreage under Federal ownership.

12. It is difficult to match many of the maps with the associated tables to follow BLM's analytical processes.

36-11 13. Table 4-3 should show which riparian habitats are decreased and which are increased by each alternative.

14. BLM should implement Alternative C for Larry Creek and White Canyon riparian areas to ensure management of upland watersheds.

36-12 15. Management of designated riparian areas should include elimination of woodcutting, an activity which is generally adverse to a healthy riparian habitat.

SONORAN DESERT UPLAND BAJADAS

36-13 16. The Sonoran Desert bajadas are extremely unique and diverse habitats found in Arizona. Most of these habitats around Phoenix and Tucson are directly or indirectly impacted by housing developments. TWS recommends that the BLM reconsider disposal of lands with high quality Sonoran Desert bajada values and consider acquisition of additional parcels of this habitat. Specifically, the Silverbell Mountains, Picacho Mountains, Suizo Mountains, and Tortolita Mountains contain quality Sonoran Desert bajada habitat.

36-14 17. BLM should specifically prohibit the development of a road to the Newman Peak communications site to avoid severance of this habitat.

36-15 18. We commend BLM for the concept of a desert tortoise management area, but believe the current BLM boundaries for the Picacho Mountains to be inadequate for such a designation. The current boundaries omit from BLM management the bajada which contains the majority of desert tortoise

36-10. Refer to response 22-12.

36-11. Refer to Appendix 7 in the draft RMP/EIS.

36-12. The Phoenix Resource Area does not currently issue woodcutting permits. Activity planning for special management areas and ACECs would address any problems associated with woodcutting, if appropriate.

36-13. Refer to response 34-22.

36-14. Refer to response 29-7.

36-15. Refer to response 18-7.

36-15 habitat. We recommend that BLM expand the current management boundaries in the Picacho Mountains to include bajada habitat which will enable conservation of a minimum viable population of desert tortoises. Increasing the management area size will ensure conservation of a more inclusive ecosystem for all the species in the Picacho Mountains, especially with increased development in this area over the next 20 years.

36-16 19. In addition to bighorn sheep, the Silverbell Mountains also contain a healthy population of desert tortoises. This area should be managed as both a bighorn sheep and desert tortoise management area since management objectives and goals would be compatible for the two species. BLM should implement the expanded boundaries provided in Alternative C for the Silverbell Mountains for more effective bighorn sheep management.

OBJECTIVES AND PRESCRIPTIONS

36-17 20. The objectives and prescriptions presented in Chapter 2 are generally vague and unmeasureable. Without detailed prescriptions, it is impossible to follow BLM's impact analysis of RMP implementation. At a minimum, BLM should define management objectives and prescriptions for riparian areas, T&E species, and other wildlife. Without better defined objectives and prescriptions, the document fails to meet Federal Land Policy and Management Act guidelines for wildlife resources.

Again, thank you for the opportunity to comment on this RMP. Should you require further clarification of any of the above comments, please contact The Wildlife Society at the above address.

Sincerely yours,

Sheryl L. Barrett

Sheryl L. Barrett
President-elect
Arizona Chapter

36-16. Refer to response 18-6.

36-17. Refer to the General Response to Comments on the Planning Process.

37

MCKINLEY COUNTY WILDLIFE FEDERATION
1420 Monterey
Gallup, New Mexico 87301

23 April 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
Phoenix Resource Area
2015 W. Deer Valley Road
Phoenix Arizona

Dear Mr. Tower:

The McKinley County (New Mexico) Wildlife Federation appreciates the opportunity to comment on the Phoenix Resource Management Plan and Environmental Impact Statement.

Our organization has recently become sensitized to the importance of BLM Land Management Plans as they affect the quality of life in our region. We realized almost too late that the New Mexico BLM Farmington Resource Area Management Plan included a plan to dispose of all "vacant public land" in McKinley County, New Mexico. Now we come to understand that the Phoenix Resource Area Management Plan proposes a similar "disposal plan" for all the public land in Apache and Navajo Counties, Arizona. We believe these plans taken individually and collectively reflect an abandonment of public interests in the protection and management of wildlife habitat and other natural resource management interests in our region of Arizona and New Mexico. We believe the "synergistic" effects of these plans which, if implemented, would result in the total loss of public rangelands in East Centeral Arizona and West Central New Mexico, would result in irretrevable and irreversible loss of wildlife habitat, open space and natural resource management in this region.

37-1 As we understand the plan there would be almost total disposal of BLM Lands in Navajo County, and two fifths of the public land in Apache County under all but the "no action" plan. However, we come to this conclusion by the circuitous method of examining Table 4-1 which shows loss of Payment in Lieu of Tax Revenues. It is very distressing that the plan does not show in map form which specific public lands would be disposed of in Apache and Navajo Counties. We would request that these lands be specifically identified and subject to public review before the plan is finalized.

37-2 A second issue where information is not apparently accurate is in map 3-4C purporting to show "Medium to High Density Pronghorn Antelope Habitat" in the Apache-Navajo Portion of

37-1. The land tenure adjustment issue is discussed on page 20 and under each alternative in Chapter 2 of the draft RMP/EIS. Under Alternatives B and C, it would be the BLM's intent to consolidate public land into Resource Conservation Areas (RCAs) and Cooperative Recreation Management Areas (CRMAs). Public land outside the RCAs and CRMAs are identified for disposal to another federal agency (i.e., public land bordering the Petrified Forest National Park and the Saguaro National Monument), to local governments under the Recreation and Public Purposes Act (R&PPA), by exchange or sale (land identified in Appendix 1) or by exchange only.

37-2. According to the Arizona Game and Fish Department Pronghorn Distribution Map (1985), the area from St. Johns to Sanders supports very sparse to sparse densities of pronghorn.

37-2 the Resource Area. We believe that the region between Sanders and St. Johns along US 666 should reflect a medium, if not high Pronghorn density.

37-3 On page 23 the plan mentions that "4000" acres have been identified for disposal to benefit the Petrified Forest National Park" and an additional 45236 acres have been identified as suitable for disposal through state indemnity selection, state or private excahange or sale." We can find nowhere where these lands are identified. Would these lands include what we believe may be part of the medium to high density pronghorn habitat (see above)? By inspection of table 4-1 it would appear that three fourths of this land would come from Apache and Navajo Counties. Is this a correct inference?

37-4 It also would appear that riparian habitat, while increased overall in the RMP would be decreased in the Apache-Navajo portion. Specificity in the plan is requisite to be sure of this conclusion. But the pattern of substantial loss of habitat resources in the Apache-Navajo portion is of concern.

If we are correct in this analysis we have grave concerns over the withdrawal of federal public land management on both sides of the New Mexico and Arizona State line as it will effect the ability to manage wildlife and riparian habitat in this region. To this end we propose the following:

37-5 1) BLM identify a "Special Management Area" in the Zuni River, Surprise Creek and Hardscrabble Wash Region. This SMA would also constitute a land acquisition and consolidation zone for Pronghorn habitat. An additional benefit of consolidation and intensive management in this area would be protection of important but badly vandalized cultural resources in this zone.

37-6 2) BLM identify all natural surface water sources and riparian habitat as retention zones, "Public Body Exchange Only" zones (State, National Park Service, F&WS), or BLM acquisition zones. The ability to manage and promote wildlife values in arid regions is based largely on the ability to manage and protect water sources from incompatible uses, as you recognize by the special attention given to riparian habitat in your plan. The special concern already given to these zones needs to be redoubled beyond the acreage calculations. Land consolidation and acquisition should take place in areas like the Little Colorado River in the Woodruff area and the Puerco River between Petrified Forest and Holbrook, where existing BLM holdings already form protective anchors which should be expanded.

37-3. Refer to responses 37-1 and 37-2.

37-4. Appendix 7 of the draft RMP/EIS shows which riparian habitat would be considered for disposal under each alternative.

37-5. BLM parcels in the region are identified for acquisition by the state of Arizona. The state is bound by terms of a Memorandum of Agreement to manage the cultural values in a manner consistent with federal laws and regulations. An aerial surveillance program, jointly managed by federal and state agencies, exists in the Zuni-Hardscrabble region of Apache County. This program is designed to deter archaeological vandalism.

Alternatives for consolidating more public land in Apache and Navajo Counties were considered but not carried forward for the reasons stated on page 41 of the draft RMP/EIS.

37-6. Refer to responses 3-2, 22-3 and 22-12.

37-7 3) BLM should allow no net loss of Public land values in Apache and Navajo Counties. Exchanges should be allowed only within the Apache-Navajo portion for consolidation and management. A net loss of public land values in this portion creates an undue hardship on the local public. When combined with similar BLM plans on the New Mexico side of the State line, the combined effects will result in a severe impact on the wildlife and recreation opportunities on this portion of the Colorado Plateau. This result would be unfair and unacceptable to our population.

We appreciate the opportunity to comment on the Plan and hope that our comments will result in a more beneficial plan for the wildlife and human populations of Apache and Navajo Counties in Arizona and McKinley County in New Mexico.

Sincerely,

Robert E. Menapace

Robert E. Menapace

37-7. Exchanges are not projected to cause a significant loss of public land values such as wildlife or recreational values. Little change from current land uses is expected as a result of proposed exchanges.

38

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO: LC-159

APR 2 1988

Memorandum

To: Mr. Arthur E. Tower, Phoenix Resource Area Manager, Bureau of Land Management, 2015 West Deer Valley Road, Phoenix, Arizona 85027

From: ACTING Regional Director

Subject: Review of Draft Phoenix Resource Management Plan and Environmental Impact Statement (RMP/EIS) (your notice of January 22, 1988)

We have reviewed the subject RMP/EIS and have the following comments to offer.

General Comments

38-1 Picacho Mountain Resource Conservation Area (RCA) - The majority of tortoises encountered and tracked by radio telemetry during Bureau of Reclamation (Reclamation) sponsored wildlife studies have been found on the bajadas outside of the boundaries of the currently proposed Picacho Mountain RCA. These bajadas contain the most diverse habitat and species composition in this mountain range. Specifically, tortoises were located in T. 8 S., R. 9 E., sections 16, 21, 28, 34, and 35 (see enclosed map). This RCA is proposed as a Tortoise Management Area. In order to maintain or improve the capability of important habitat to support existing populations, we believe it is critical that these areas be included in the RCA. This will enable BLM to preserve the most intensely studied tortoise population in Arizona. Although Reclamation did not conduct tortoise studies on the east side of the mountain, we expect these bajadas to be just as important to resident wildlife. For these reasons, we recommend acquisition of an additional square mile around the presently proposed Picacho Mountain RCA.

We also recommend against increased recreation in the Picacho Mountains due to the detrimental impacts this would have on the desert tortoise population. Impacts on this species from intense human disturbance have been observed with the decline of tortoises at Picacho Peak State Park. We would discourage advertisement of this area as a tortoise management area, to avoid genetic pollution and introduction of diseases into the wild population through captive tortoise releases. This problem has persisted at the Desert Tortoise Natural Area in California.

Maps - For future draft EIS's, it would be helpful to the reader if the EIS contained a map of each portion (e.g., South Central, North Central and Apache-Navajo) that identifies all the various designations (RCA; ACEC; SMA; CRMA; R&PPA; and utility corridors) that are proposed for that portion.

38-1. Refer to response 18-7.

Lake Pleasant - It is our understanding the agreement regarding the management of the Federal lands at Lake Pleasant, that will be used for Reclamation purposes, will be the responsibility of Reclamation. These lands will be available for public recreational use. The size of the Regional Park has not yet been finalized but will be jointly determined by Reclamation and the Bureau of Land Management (BLM).

Chapter 1 - Planning Issues, Page 5, Issue 2, Utility Corridors and Communication Sites

38-2 Have analyses been conducted to determine whether or not the capacity or capability of the planned corridors and communication sites will meet the anticipated needs of the area?

38-3 As part of its Central Arizona Project (CAP) system, Reclamation plans to construct a microwave communications site on Helmet Peak in section 11 of T. 17 S., R. 12 E. Will this constitute a conflict with the RMP's proposed utility corridors and communication sites?

Environmental Issues Considered but not Analyzed, Bald Eagle, Page 10

38-4 The RMP/DEIS states that BLM acquisition of a nest site at the upper end of Lake Pleasant would not significantly change the current management of bald eagle habitat. We would agree with this statement ONLY if BLM continues enforcement of public closures that are now in effect during the eagle breeding season. We recommend the RMP/FEIS reiterate this commitment to do so.

Chapter 2, Description of Alternatives

38-5 Environmental Management, Page 19 - Regarding the statement that BLM will conduct protected plant and cultural resource clearances as a part of the environmental analysis process, what percentage of land will be surveyed to assess impacts of land disposal?

38-6 Table 2-4, Pages 28-30, Under "Planned Actions" - Does prohibition of land use authorizations in riparian areas mean that gravel mining would be prohibited in the riparian zone? We recommend the EIS indicate whether or not gravel mining would be allowed.

38-7 Table 2-4, Page 29, Gila River Riparian Management Area - If built, Buttes Dam--an authorized feature of the CAP--would result in the inundation of much of the Gila River Riparian Management Area by the dam's reservoir pool. This possibility and its implications to BLM's proposed action should be discussed in the EIS.

38-8 Issue 5 - Recreation Management; R&PP Transfers, Page 32 - The CAP's Tucson Aqueduct, Black Mountain Pipeline will require approximately 35 acres of public domain lands located in the W½W½E½ of section 11 of T. 15 S., R. 12 E., G&SRM. Reclamation anticipates a permanent easement will be acquired. The draft EIS identifies this area as being transferred to Pima County for park development. Any future use of

38-2. The proposed location of corridors and communication sites resulted from comments received during the issue identification and alternative formulation phases of the planning process. Comments from the industry (Western Regional Corridor Study) as well as the needs of existing users and forecasted future demand were used to develop alternatives.

38-3. In our discussions with the Bureau of Reclamation, Helmet Peak was not identified as a communication site for the CAP. Applications by the Bureau of Reclamation for communication sites would continue to be considered until disposal occurs.

38-4. The site would be protected in compliance with NEPA, the ESA, and other applicable laws and regulations (see the "Environmental Management" section on page 19 of the draft RMP/EIS).

38-5. The percent coverage of land surveyed depends on 1) how much is known about the resources on the land, 2) whether the area is near to known critical or important resources and 3) whether the disposal is a private or state exchange.

38-6. Gravel extraction restrictions apply only to the riparian areas where land use authorizations are prohibited. The prohibition does not apply to group recreation use permits where the BLM is satisfied that such use will not harm riparian values.

38-7. In the absence of receiving the Bureau of Reclamation's identification of plans and recommendations concerning the Buttes Dam site during the issue identification and alternative development phase of the draft RMP/EIS, the BLM has not included the impacts of the dam on resources along the Gila River.

When the schedule and specifications for the Buttes Dam become available and its effects can be estimated an amendment to the RMP would be considered.

38-8. Pima County has indicated that the easement required by the Bureau of Reclamation would not interfere with park development of the area. Refer also to response 11-1.

these lands would need to comply with the stipulations of our easements.

38-9 Map 2-1, Resource Conservation Areas (South Central Portion), Page 44 - Is the Picacho RCA erroneously coded as Alternative C (should be coded as Alternative B)?

38-10 Map 2-21, Silver Bell RCA Special Management Area, Page 69 - Reclamation has recently purchased 4 square miles of State land in T. 14 S., R. 11 E., sections 10, 11, 14, and 15, as a wildlife mitigation corridor for the CAP. This parcel of land will allow wildlife movements to continue from the Tucson Mountains west to the Roskruge Mountains. In addition, the Tohono O'Odham Nation is considering designating a portion of the northern part of the Garcia Strip as a wildlife movement corridor, in T. 14 S., R. 11 E., sections 16, 17, and 18. These two corridors would directly tie into the proposed Silver Bell RCA where it follows the northern boundary of the Nation. Should this occur, we recommend that BLM acquire the S½ of T. 14 S., R. 11 E., section 8 as part of the Silver Bell RCA. This acquisition would allow a continuous wildlife movement corridor across Avra Valley.

Chapter 3, Affected Environment

38-11 Map 3-3A, Special Status Plant Habitat (South Central Portion), Page 111 - Reclamation has been informed by Fish and Wildlife Service that potential Tumamoc globe-berry habitat extends north to the Gila River.

Chapter 4, Environmental Consequences

38-12 Impacts of Alternative B, Effects on Watershed Condition, Page 142 - A statement in the first paragraph on page 142 is somewhat confusing. This sentence reads "Under Alternative B, ORV restrictions or transfer of ownership would prevent further degradation to 182,000 acres of land currently held in public ownership . . . ." Is it that further degradation would likely occur but the land would no longer be in public ownership, or that transfer of ownership would prevent further degradation? If it is the latter, please explain how the transfer of ownership would prevent further degradation to lands.

38-13 Effects on Areas of Cultural Significance, Page 143 - How did you arrive at the figure of 10-25 percent arrived at in determining the degree of cultural value of sites lost on lands identified for disposal?

Effects on Recreation Use, Page 149 - We recommend BLM consider inclusion of bajada habitats in its acquisition for cooperative parks, especially at Tortolita Mountains, as wildlife protection areas.

38-14 Alternative C, Effects on Desert Tortoise, Page 155 - This discussion states all 60,000 acres of important desert tortoise habitat would be retained. The Alternative B discussion states all 61,300 acres of important desert tortoise habitat would be retained (page 147). Please correct or clarify this inconsistency.

We would appreciate receiving a copy of the final RMP/FEIS when it becomes available.

William E. Rees

38-9. The comment is correct; the Picacho Mountains RCA is proposed in the draft RMP/EIS only under Alternative B.

38-10. We appreciate the need to create wildlife corridors in the Avra Valley. The parcel which the BOR requests that the BLM acquire, however, is private land outside the Silver Bell RCA boundary. The BLM's priority for acquisitions is to consolidate public land holdings in the proposed RCA, principally through exchange with the state. Private exchanges would be considered only if the BLM is approached by the landowners with a proposal.

The key to the corridor's success seems to be the Garcia Strip designation. When the Tohono O'Odham land is designated for use as a wildlife corridor, the need for additional corridor land can be discussed.

38-11. The map depicts the extent of known or high potential habitat. It does not show either the extent of known habitat within the Tohono O'Odham Reservation or the extent of lower potential for occurrence to the north. The BLM continues to conduct field surveys for Tumamoc globeberry within all areas considered potential habitat.

38-12. We have assumed that the transfer of land from public to private ownership would prevent degradation due to ORV use. It is assumed that the private landowner would restrict access and ORV use.

38-13. As stated in the footnote to Table 4-2 on page 129 of the draft RMP/EIS, these are relative values arrived at by the interdisciplinary team archaeologist and were based on his analysis of the available data.

38-14. In the discussion of the effects on desert tortoise under Alternative C, page 155 of the draft RMP/EIS, the word "all" should be deleted from the first sentence of the third paragraph.

The sentence is revised to read: Under Alternative C, the BLM would retain 60,000 acres of important habitat, acquire 15,200 acres of important habitat and dispose of 1,600 acres of important habitat.

39

ARIZONA MINING ASSOCIATION

DAVID C RIDINGER
President

April 29, 1988

Arthur E. Tower
Phoeniix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

PHOENIX RMP/EIS

Set forth below are our comments on the above-referenced draft, dated December 1987. These comments are submitted on behalf of the Arizona Mining Association and its member companies:

Amax Mineral Resources Company
Anamax Mining Company
ASARCO Incorporated
Callahan Mining Corporation
Cyprus Minerals Company
Homestake Mining Company
Inspiration Consolidated Copper Company
Magma Copper Company
Phelps Dodge Corporation

Our comments are general in nature and scope; we appreciate the opportunity to make comments.

39-1 1. In executing land disposals and exchanges, proper consideration should be given all existing or known mineral resources and "active" mining claims. Blocking up ownership of entire potential orebodies should be avoided, if possible; i.e., geologic indicators of orebody boundaries should be used to consolidate land ownership so that potential orebodies are not divided. Also, mining claimants should not be required to prove validity of a claim if it is being actively worked.

2[illegible] Third Street Suite 2015 Phoenix Arizona 85004 602 266 4416

Arthur E. Towers
April 29, 1988
page 2

39-1 2. When special management designations (ACEC's, SMA's and RCA's) are made, mineral resources existing in those areas should receive adequate consideration, allowing for mineral exploration and development.

3. Before certain ACEC's, etc. are withdrawn from mineral entry, thorough minerals inventory assessments should be made. Rational decisions on land use and management cannot be made prior to proper study of the minerals and values that may be contained in a specific area.

If you would like to discuss any of the above points, please advise.

Sincerely,

David C. Ridinger

39-1. Every effort has been made to identify areas where important mineral development can be expected in the future. Only proposed ACECs and other special management areas with critical natural resources especially sensitive to mining activity have been identified for special protection measures.

40

United States Department of the Interior

NATIONAL PARK SERVICE

Petrified Forest National Park
Arizona 86028

IN REPLY REFER TO:

L14

May 5, 1988

Mr. Arthur E. Tower
Bureau of Land Management
Phoenix District Office
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

40-1 We appreciate the concern shown for addressing the needs of Petrified Forest National Park as addressed in the Plan. At present, the National Park Service is beginning an evaluation process of adjoining lands for potential values that would merit their inclusion in Petrified Forest National Park. The attached map shows the extent of these study areas. Bureau of Land Management lands in the study areas are shown in a stipple pattern. We look forward to continued cooperation with BLM in this study.

40-2 Should the Bureau of Land Management retain any lands adjoining Petrified Forest National Park, we would like to see a limitation placed on off-road vehicles on those lands. To date, we have had only a few instances of ORV trespass on park lands, but some have included the park's National Wilderness Area. In the future, such problems can only be expected to increase. Limitations on ORV use on adjacent lands would protect not only those lands, but adjacent park and wilderness values. Such values include not only the traditional values of scenic beauty, solitude and a natural environment, but also the extensive paleontological and archeological remains of the area.

Thank you for this opportunity to comment during your planning process. If we can be of further help or offer additional clarifications, please don't hesitate to call on us.

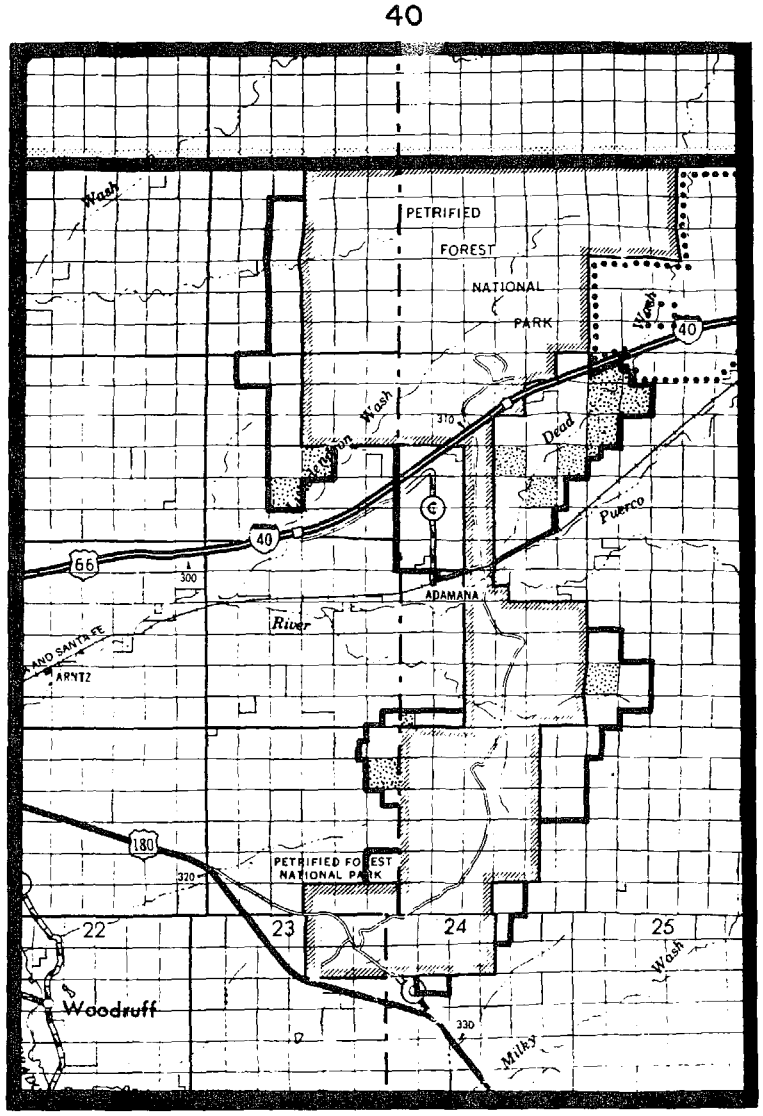
Sincerely,

L. Edward Gastellum
Superintendent

Enclosure

40-1. Public land identified for possible inclusion into the Petrified Forest National Park includes the public land directly adjacent to the existing park boundary.

40-2. The land would be classified as a limited ORV designation area with off-road-vehicle use restricted to existing roads and routes.



PETRIFIED FOREST NATIONAL PARK

Evaluation Lands within heavy border
Bureau of Land Management lands within study area are stippled

41

SIERRA CLUB

Grand Canyon Chapter · Arizona

RINCON GROUP

April 30, 1988
117 N. 2nd Avenue
Tucson, AZ 85705
792-2690

RECEIVED
BLM, PHOENIX DIST. OFFICE
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Arthur E. Tower
Manager, Phoenix Resource Area
Bureau of Land Management

Dear Mr. Tower:

I would like to offer several additional, if tardy, comments on the Phoenix Resource Management Plan and Environmental Impact Statement. These are intended to supplement my letter of April 29, 1988.

The RMP development team did a good job of presenting information on riparian areas in general and on the status of riparian areas within the Phoenix Resource Area (pp. 107-110). However, the RMP shows a glaring omission in its lack of general management prescriptions for those riparian areas. The need for such management is clearly stated: "of the 93 miles of riparian habitat, six miles is in good ecological condition, 80 miles is fair and seven miles is poor." (p. 108) Table 3-14 (p. 109) shows that only 0.4 mile of riparian habitat is in "excellent" condition, and that all areas show a static or downward trend.

Given the clear and explicitly stated value of riparian areas, BLM's ultimate goal should be to improve all its riparian lands to "excellent" condition. The minimum acceptable goal for this RMP is to improve every riparian area to the next higher status: poor up to fair, fair up to good, and good up to excellent. That goal should be clearly stated in the RMP, along with specific management steps to be followed for achievement of the goal.

The RMP does mention improvement of riparian habitat in the handful of Areas Proposed for Special Management, but even there the "Planned Actions" do not contain the single most important action for riparian recovery: an end to livestock grazing. Proper management of all riparian areas, especially those with SMA or ACEC status, must include cattle exclosures or other mechanisms to eliminate grazing pressure on riparian vegetation.

41-1 One other major omission is a means to judge the progress and effectiveness of the RMP. This document should include achieveable, measureable objectives, along with methods of monitoring progress, a monitoring schedule, and remedies to perform if monitoring shows that progress is not meeting the planned objectives. The monitoring plan should include wildlife status, riparian habitat and watershed condition.

Without these inclusions, the RMP will have limited effectiveness on conditions within the Phoenix Resource Area.

Yours,

Dale S. Turner
Conservation Chair
Rincon Group

41-1. Refer to the monitoring and evaluation plan in Appendix 12 of the draft RMP/EIS and the monitoring plan in the proposed RMP in this document.

42

Arizona Cattle Growers' Association

Publishers of Arizona Cattlelog
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Walter Armer, Tucson
Lynn Anderson, Peoria
Bob Bowman, Sonoita
*Deceased

May 6, 1988

Mr. Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Tower:

The Arizona Cattle Growers' Association submits these comments regarding the Phoenix Resource Management Plan and Environmental Impact Statement Draft.

Our members who ranch in the Phoenix Resource Area have not advised us of specific concerns regarding the Draft Plan which they would have us address on their behalf. We do, however, wish to offer a general statement of consideration regarding Land Tenure Adjustment, Areas of Critical Environmental Concern, Riparian Habitat, and Wildlife Resource Management.

42-1 Land Tenure Adjustment -- We understand the desire of the agency to block up areas of land in federal ownership to "eliminate management complications caused by checkerboard ownership." Our concern is that those blocks of public lands continue to be managed for multiple use and continue to be available for grazing use.

42-2 Areas of Critical Environmental Concern (ACECs) -- We are uncertain as to how these areas, once designated, are intended to be managed. Will they still be managed for multiple use? We would object to them being managed as the equivalent to wilderness areas without having earned wilderness designation.

42-3 Riparian Habitat -- We are concerned that too often in the management of riparian habitat the value of using livestock grazing as a management tool is overlooked. We would not wish to see riparian areas arbitrarily closed to grazing.

Wildlife Resource Management -- Wildlife and wildlife habitat on BLM land are managed under a memorandum of understanding with the Arizona Game and Fish Department. We would not wish BLM to abdicate its responsibility for resource management to the detriment of livestock grazing. The resource must be managed to continue to support at least the present level of livestock grazing.

The Resource Management Plan and the Preferred Alternative B reflect a great amount of effort and consideration on behalf of the Bureau of Land Management. Thank you for your efforts and for your further consideration of the concerns which we have expressed.

Sincerely,

Pamela Neal

Pamela Neal
Executive Vice President

42-1. The blocks created by consolidating public ownership would continue to be managed for multiple uses. Restrictions on grazing and other uses may be proposed for specific, discrete areas if necessary for the protection of specific values. The need for any land use restrictions not identified in the proposed RMP would be identified in the development of activity plans for ACECs and special management areas. Public land users affected by any proposed land use restrictions would be asked to participate in the development of these activity plans.

42-2. ACECs would be managed to protect the resource values for which they were established. In most cases, this means that current uses will continue but be closely monitored.

42-3. See response 42-1 above.

43

ACTIVE MEMBER
OUTDOOR WRITERS ASSOCIATION OF AMERICA

DAVID E. ZINN
June - November: General Delivery, Wise River, MT 59762 • (406) 832-3184
December - May: 6220 East Northern Ave., Scottsdale, AZ 85253 • (602) 948-0684

RECEIVED
BLM, [illegible] DIST. OFF.
PHOENIX, ARIZONA

May 5, 1988

Bureau of Land Management
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Attn: Arthur E. Tower

Dear Mr. Tower:

Unfortunately I just received your notice regarding the submittal of comments concerning the seven special management areas (one million acres) you plan to control to perserve fragile resouces and increase management efficiency. Although too late to meet your April 29th deadline, I hope my comments will be accepted and considered.

I don't know what you mean by "increase management efficiency". If efficiency means increased utilization, particularly by ranching, ie. more cattle allotments, I am absolutely against it. The BLM land I hunt quail on here in Arizona is for the most part continually overgrazed, and I have had a tough time finding areas with enough cover to support quail since I moved here in 1968. The only lands more overgrazed than BLM land are State Land (a real disaster) or the rancher's own private land.

43-1 I would hope that the areas referenced the April 15, 1988 Arizona Outdoor News, in particularly the Empire Ranch, will see very much REDUCED grazing in the future, balancing out the hunting and recreation users interests for a change.

We bird hunters living in Phoenix find we have to drive at least two hours to the higher elevations of National Forest administered areas to find sufficient cover to support quail populations, meanwhile driving past vast uninhabited, bare as a billiard table, deeply eroded, stark, sand and rock vistas devoid of grass, stretching for miles, as far as the eye can see (non-believers can simply try driving north on I-10 out of Phoenix for confirmation). I will admit that the initial stretch is State land, but it is difficult to note any difference at the BLM boundaries.

Let's hope that you can do a better job in the future to protect and preserve our public lands, at least these seven special management areas. I would love to congratulate you for managing OUR public lands for the balanced interests you are mandated to serve instead of simply folding under the pressure of the ranchers. Remember there are now many more VOTING recreationists than ranchers. I offer my services to help work the problem. Meanwhile I await examples to laud your efforts.

Sincerely,

David E. Zinn - Scottsdale, AZ

43-1. In June 1988, the BLM acquired by exchange 41,000 acres within the Empire, Cienega and Rose Tree ranches near Sonoita, Arizona. In addition to extensive grazing land the ranches include important riparian areas, endangered species habitat, big and small game habitat and open space for recreation activities. Land use planning for this acquired land is scheduled to begin in 1989. The resulting plan will become an amendment to this RMP.

44

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

9 MAY 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

The Environmental Protection Agency (EPA) has reviewed the **Phoenix Resource Management Plan and Draft Environmental Impact Statement** (DEIS). Under the National Environmental Policy Act and Section 309 of the Clean Air Act, EPA is required to review and comment on this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns-Insufficient Information (see the attached "Summary of Rating Definitions and Follow-up Actions). Our rating reflects concerns we have with existing watershed and riparian habitat conditions in the Phoenix Resource Area and the potential attendant water quality impacts. We have enclosed comments regarding this DEIS.

EPA supports the acquisition of privately owned riparian areas proposed under Alternatives B and C. The management activities and restoration measures which will ensure protection of these areas and improve watershed and riparian habitat conditions should be discussed in the final EIS. EPA also commends the controls proposed for off-road vehicle (ORV) use under alternatives B and C. Watershed conditions and water quality should benefit from the closure of open ORV areas.

We appreciate the opportunity to review this DEIS. Please send us two copies of the final EIS when it is filed with the EPA Headquarters office. If you have any questions, please call me at (415) 974-8083 (FTS 454-8083), or have your staff contact David Powers at (415) 974-8187 (FTS 454-8187).

Sincerely,

Deanna M. Wieman, Director
Office of External Affairs

9 MAY 1988

EPA Comments on the Phoenix Resource Management Plan and Draft Environmental Impact Statement:

Water Quality

1. Page 10 of the DEIS states that "the lack of baseline and pollution source data precludes a reasonably accurate prediction of the impacts resulting from any of the alternatives. Therefore, further description of impacts to water quality will be indirectly assessed under the watershed conditions issue." We strongly recommend that the Bureau of Land Management (BLM) coordinate closely with the Arizona Department of Environmental Quality (ADEQ), the Arizona Game and Fish Department, and the U.S. Fish and Wildlife Service to determine existing water quality and protected use baseline conditions and to identify pollution sources.

Section 319 of the Water Quality Act of 1987 established a new program which requires states to assess nonpoint source pollution problems, develop a nonpoint source pollution management program, and implement controls to improve water quality. Identified control measures should be implemented on BLM lands to address nonpoint source pollution problems. ADEQ is in the process of assessing nonpoint source pollution problems statewide. Their recently completed 305(b) Biennial Water Quality Report may also contain information which can be used to supplement BLM's existing data on watershed, riparian, and water quality conditions in the final EIS. Additionally, the information BLM staff obtain during grazing allotment evaluations may assist ADEQ in the development of their nonpoint source pollution management program.

44-1 2. Page 109 and 110 of the DEIS identify nine specific riparian areas (17.2 acres) on BLM lands where ecological conditions are in poor condition and/or in a declining trend. Page 99 of the DEIS indicates that 182,000 acres of watershed are in satisfactory condition but are highly susceptible to erosion. An additional 348,000 acres of watershed are classified as being in unsatisfactory erosion condition. The final EIS should discuss special management practices which will be afforded to sensitive watersheds and watersheds in unsatisfactory erosion condition. Restoration treatments which will be applied to watersheds in unsatisfactory condition and a priority list and timetable for implementation of those treatments should also be discussed in the final EIS.

3. EPA supports the acquisition of 53 miles of riparian habitat proposed under Alternatives B and C. The existing ecological conditions and trends of the habitat to be acquired and the 20 miles of riparian habitat to be transferred to private or state ownership should be discussed in the final EIS.

44-1. As stated in the draft RMP/EIS, Category IV watersheds scheduled for special management and with riparian and wildlife protection needs would receive priority for activity planning and project work. The specific improvements and methods used will be identified in activity plans for each area included in the proposed RMP. The identified improvements and methods would include soil or water conservation practices deemed suitable best management.

44-2 4. The DEIS (pages 144 and 153) states that under Alternatives B and C 43 miles of riparian habitat would be managed to improve current conditions and that management emphasis would be directed toward 50 miles of riparian habitat in eight areas of special management. The final EIS should discuss general management practices which will be afforded to riparian habitat in special management areas. The management practices which will be applied to improve the current condition of 43 miles of riparian habitat should also be discussed.

5. We recommend close coordination with the Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and ADEQ during development and implementation of the riparian management plans. Coordination with these agencies should also occur for management activities or decisions with the potential to impact wetlands and other fish/wildlife habitats (e.g., designation of utility corridors, wildlife enhancement plan development, review of mining plans of operation, development of ORV roads).

Air Quality Comments

44-3 1. The Phoenix and Tucson air basins are nonattainment basins for ozone and/or carbon monoxide and experience violations of particulate matter (PM_{10}) standards. The Phoenix Resource Area is adjacent to these air basins. We commend ORV controls proposed under Alternative B and C and believe that fugitive emissions may be reduced when the controls are implemented. The DEIS also identifies prescribed burning, road construction, and construction of mineral tailings piles as potential activities which can impact air quality. Page 19 indicates that mitigation for air quality impacts is brought forward in NEPA review of proposed projects. The final EIS should discuss the general mitigation measures which will be employed for identified activities with the potential to impact air quality, particularly in the nonattainment air basins.

Toxics Comments

1. The acquisition of up to 476,430 acres of private and state lands may occur under Alternative B (BLM's preferred alternative). We understand that site-specific environmental analyses are prepared for each acquisition. EPA recommends that the final EIS discuss how BLM will determine whether any of the acquired lands contain sites where hazardous wastes were disposed of in past years. Once the lands become BLM property, BLM becomes a responsible party under the terms of the Superfund Amendments and Reauthorization Act of 1986 (P.L. 99-499). As such, BLM could be legally responsible for remedial investigations, cleanup activities, and full or partial cleanup costs. Please contact Julie Anderson at (415) 974-8891 if you have any questions on P.L. 99-499 requirements.

44-2. See 44-1 above.

44-3. Mitigation measures for specific actions called for in activity plans developed upon implementation of the approved RMP would be determined in cooperation with the Arizona Department of Environmental Quality (ADEQ).

45

United States Department of Agriculture | Forest Service | Prescott NF | 344 South Cortez St. Prescott, AZ 86303

Reply To: 1950

Date: May 9, 1988

Arthur E. Tower
Phoenix Resource Area Manager
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Tower:

We have reviewed the Draft Phoenix Resource Management Plan and Environmental Impact Statement. Your preferred Alternative B subscribes to resource management objects that are similar to those contained in the recently adopted Prescott National Forest Plan. This is particularly true in the areas of range, watershed, and wildlife management.

The draft plan does not contain specific resource management prescriptions but identifies management goals such as to improve watershed condition. Your planned action to achieve the goal is to develop an activity plan. We trust that our comments will not be too specific for this level of plan and that they can be considered.

45-1 1. Appendix 1 indicates that 100 acres in T. 14 N., R .2 W., Section 8 (Willow Administrative Site) meet the FLPMA Sales Criteria. That site, however, contains improvements and is actively used as an administrative site by the Prescott National Forest. Therefore, it does not appear to meet the criteria quoted on page 23, "such tract because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands and is not suitable for management by another Federal department or agency." We would recommend this parcel be retained in Federal ownership and transferred to the Forest Service.

45-2 We also have an interest in obtaining the 100 acres identified in T. 14 N., R. 1 W., Sections 28, 31, and 33. We would utilize these tracts as base for exchange to obtain private inholdings within the National Forest. This would result in improved management of the National Forest and therefore benefit the public.

2. We concur with the rangeland management goals and planned actions as stated. We would encourage coordinated ranch plans be pursued in those cases where a permittee is authorized to operate on adjacent lands administered by the BLM, Forest Service, and/or State of Arizona.

Caring for the Land and Serving People

45-1. The Willow Administrative Site has been removed from the list of parcels meeting the criteria for sale in the proposed RMP.

45-2. The land described is not available as exchange base for the Prescott National Forest. It has been identified by the BLM for use in state or private exchanges to facilitate consolidation of land within the proposed Resource Conservation Areas (RCAs).

45-3 3. We do not feel that fire management concerns have been adequately addressed. We recommend more attention be given to this problem because of the past history of fire starts in the proposed Black Canyon and Lake Pleasant Resource Conservation Areas (RCA). This is particularly critical when you consider the increased recreational activity that will occur as a result of enlarging Lake Pleasant. We encourage you to consider incorporating into the proposed plan the recommendations of previous fire and activity reviews.

4. We have similar concerns in the area of recreation management. We would anticipate increased recreational use due to expansion plans for Lake Pleasant. The proposed plan is quite general and indicates that specific management plans will be developed in cooperation with BLM, Bureau of Reclamation, and Maricopa County.

45-4 We feel that the increased use will expand outward from Lake Pleasant and will impact adjacent undeveloped lands including the Prescott National Forest. This not only increases the fire risk, but also requires transportation planning within and outside the Lake Pleasant Cooperative Recreation Management Area (CRMA). We feel this should be considered and addressed. Access is important to the management of the increasing dispersed recreation use as well as for fire suppression purposes. We recommend that Yavapai County and the Prescott National Forest be included in recreation planning, transportation planning, and fire pre-suppression and suppression planning.

45-5 5. There is little mention of law enforcement in the plan. We feel that the law enforcement concern should be identified. We would assume that Maricopa County will handle law enforcement in the Lake Pleasant CRMA but there are concerns outside the CRMA. For example, off road vehicle use is limited to existing roads and trails for all areas. We would anticipate that such restrictions would require increased enforcement activity by the BLM and perhaps Yavapai County.

45-6 6. Visual resources are not mentioned.

7. Need to change name on map on page 73 from Horseshoe Lake to Horsethief Lake.

45-7 8. We understand that the Black Canyon Trail depicted on page 76 enters the Prescott National Forest on Forest Road No. 684 in Secs. 24 and 25, T. 9 N., R. 1 E., rather than paralleling the Forest boundary as shown. We recommend this be corrected to assure future coordination is accomplished.

45-8 9. We could not locate Hell's Canyon Recreation Management Area or the Williams Mesa Multiple Resource Management Area as listed on page 30.

45-9 10. The statement under item 7, page 125 is not accurate. The Willow Administrative Site described under item one of this letter contains Forest Service horse pastures, barn, corrals, storage buildings, a remote access weather station and is actively utilized in managing the Prescott National Forest.

45-3. The BLM's Phoenix District fire management policy for the Phoenix Resource Area is stated on page 19 of the draft RMP/EIS. The Phoenix District has enjoyed a close working relationship with other fire organizations in the area and we expect the cooperation to continue.

45-4. Both Yavapai County and the Prescott National Forest would be included in recreation, transportation and fire suppression plans for the proposed Lake Pleasant Resource Conservation Area.

45-5. The BLM's Phoenix District has recently added law enforcement personnel to its staff. These BLM rangers will be responsible for enforcing federal law on public land in the Lake Pleasant area.

45-6. Visual resource management was not an issue in the RMP. Impacts on visual and scenic resources are always evaluated by the BLM on a case-by-case basis when considering land use authorizations. Visual resource evaluations are addressed in the environmental assessment prepared for each proposed project.

45-7. The comment is correct. The map depicting the Black Canyon Trails CRMA has been corrected in the proposed RMP. See map 2-26 in this document.

45-8. All special management areas are more clearly delineated on maps in the proposed RMP.

45-9. Refer to response 45-1 above.

Arthur E. Tower 3

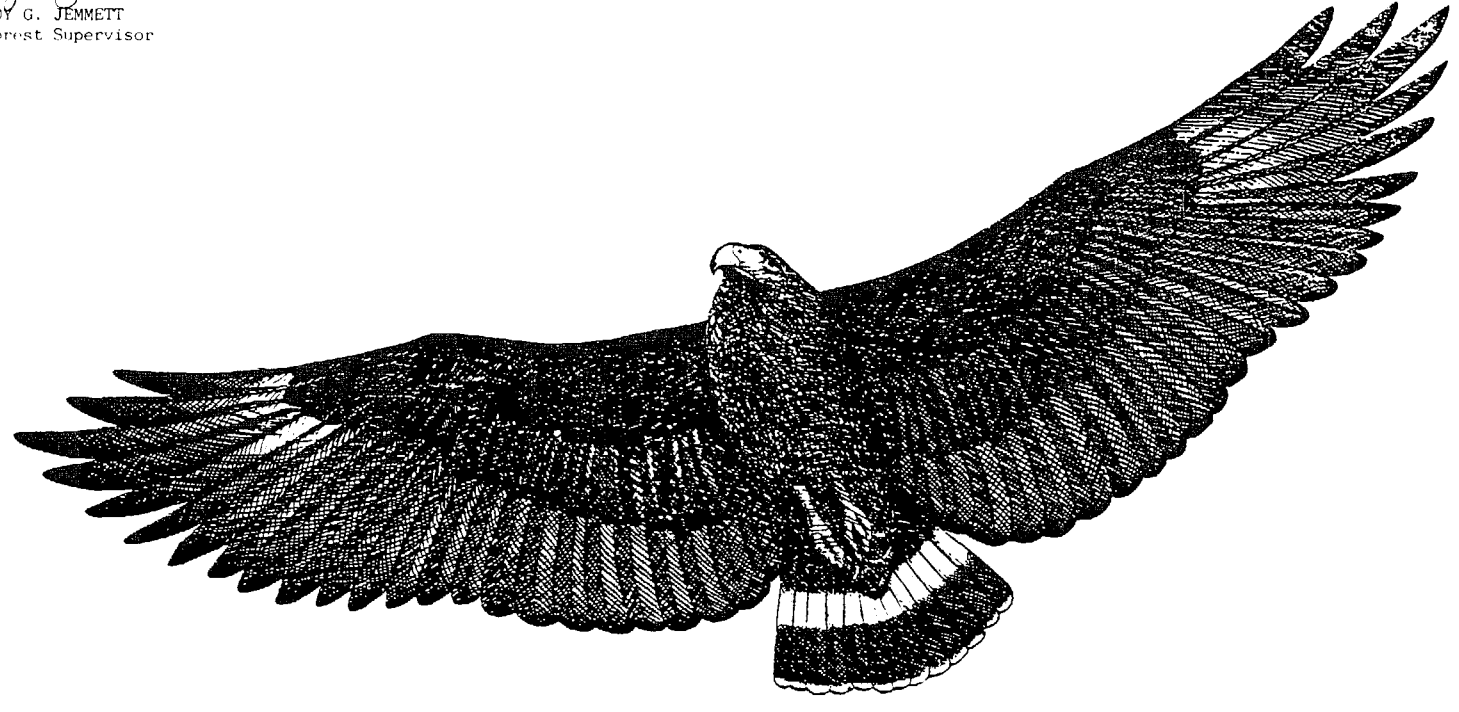
45-10 11. As BLM ownership is consolidated under the land tenure adjustment, we request that road and trail easements be reserved to provide for public access to the National Forests. We would be happy to cooperate in any way possible to accomplish this task.

We trust that our comments will be useful to you in the preparation of your final plan and environmental impact statement. We do appreciate the opportunity to review the document and provide input.

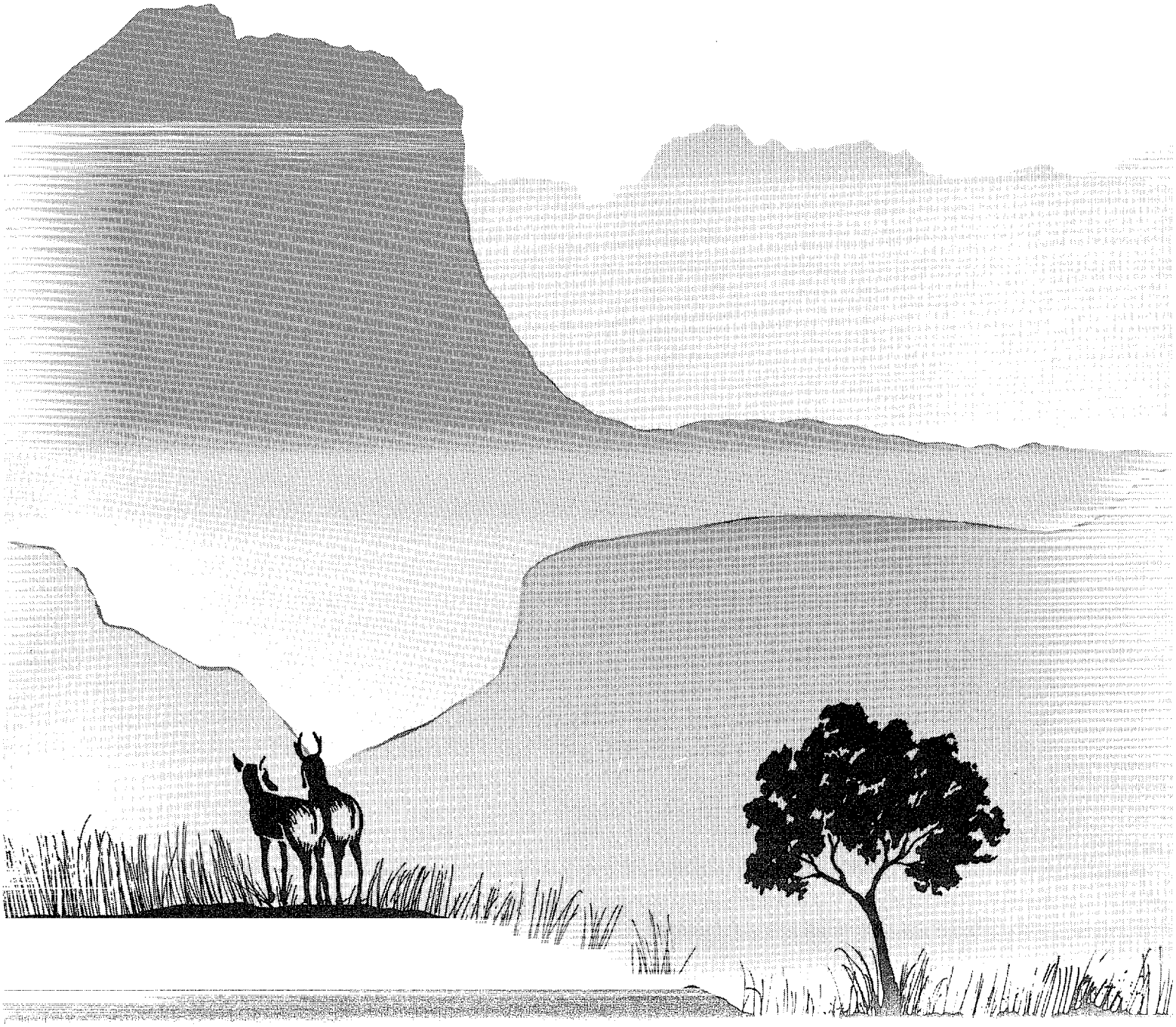
Sincerely,

COY G. JEMMETT
Forest Supervisor

45-10. The BLM does not anticipate road closures into any of the National Forests.



APPENDICES



APPENDIX 1

CHANGES AND ADDITIONS TO DRAFT RMP/EIS

1. APPENDIX 1, pg. 173. Remove Willow Adm. Site (FS) T. 14 N., R. 2 W., sec. 8, 238.08 acres from list of parcels meeting FLPMA sales criteria.
2. APPENDIX 8. Little Colorado River spinedace (*Lepidomeda vittata*) should be noted with an asterisk and shown as a federally listed threatened species.

   Little long-nosed bat (*Leptonycteris sanborni*) should be removed from the list of species considered for analysis.

   Remove Gilbert's skink (*Eumeces gilberti*) as a federal candidate species and add it to the group of state-listed species.
3. GLOSSARY. Add the following definition - RESOURCE CONSERVATION AREA: An area of public land which includes a variety of resource management activities demonstrating multiple use and sustained yield conservation.
4. The following references are added to those in the draft RMP/EIS.

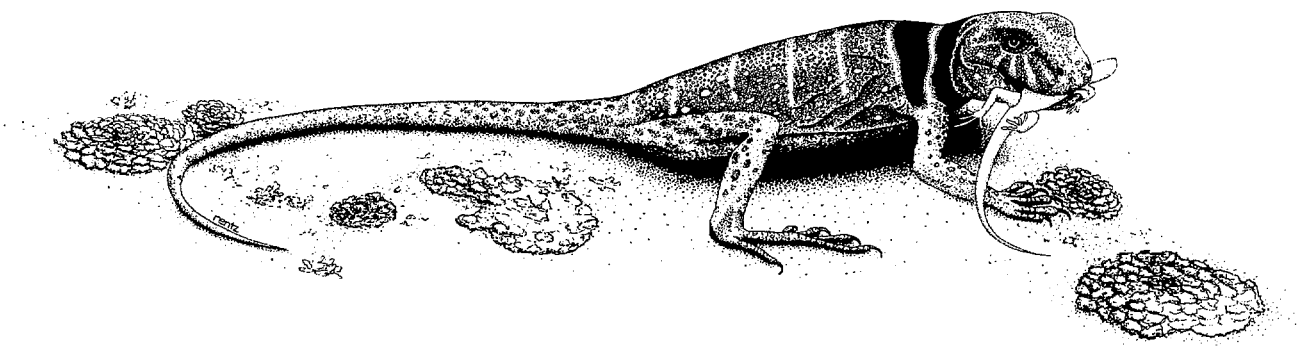
U.S. Department of Interior. Bureau of Land Management. Phoenix, Arizona. 1985. "Category 1 Plan Amendment to Lower Gila North, Black Canyon, Middle Gila and Silver Bell Planning Document."

U.S. Department of Interior. Bureau of Land Management. Phoenix, Arizona. 1986. "Phoenix District Planning Analysis."

U.S. Department of Interior. Bureau of Land Management. Phoenix, Arizona. 1987. *Phoenix Wilderness EIS.*

U.S. Department of Interior. Bureau of Land Management. Phoenix and Safford, Arizona. 1987. "Range Program Summary/Record of Decision."

U.S. Department of Interior. Bureau of Land Management. Phoenix and Safford, Arizona. 1988. *Arizona-Mohave Wilderness EIS.*



APPENDIX 2

EMPIRE AND CIENEGA RANCHES DESCRIPTION AND INTERIM MANAGEMENT GUIDANCE

General Setting

Set between the Whetstone and Santa Rita mountains, 52 miles southeast of Tucson, and just north of the town of Sonoita, the Empire and Cienega ranches contain 41,000 acres of recently acquired public land and 38,000 acres of state-owned land.

The BLM's purpose in acquiring the ranches is to preserve, protect and enhance the property's multiple-use values. These values include an extensive riparian area, presence of an endangered species, outstanding small and big game habitat, magnificent open space and potential for dispersed recreational activities such as hiking, horseback riding, camping and picnicking.

Annual rainfall of about 15 inches and an elevation of some 4,600 feet nurture what the Arizona Nature Conservancy described as one of the finest examples of true grasslands in the state.

The ranches are bisected by Cienega Creek, which flows yearlong for 7.5 miles through the area. The water supports an impressive riparian community of cottonwood, willow, ash and mesquite trees as well as other stream-side vegetation.

The creek is listed number one for protection by the Desert Fishes Recovery Team, an organization made up of professional wildlife biologists representing federal and state agencies as well as universities and private groups.

The presence of the Gila topminnow and Gila chub is the primary reason for the stream's rating. The Gila topminnow is on the federal endangered list and the Gila chub is a candidate for listing. Aquatic biologists say one of the largest and safest populations of the Gila chub is found here. The chub can grow to 10 inches, but is normally four to five inches long. The U. S. Fish and Wildlife Service lists the creek as one of five critical habitats needed for the future survival and recovery of the Gila topminnow. Fully grown, the Gila topminnow is about one inch long.

The stream also supports a third species of native Arizona fish, the longfin dace. The fish averages two to three inches in length and the population in Cienega Creek represents one of the largest and healthiest anywhere.

The entire area is prime wildlife habitat and diverse populations of game and non-game animals and birds are found throughout the ranches.

Without much effort, visitors see whitetail and mule deer, javelina and pronghorn antelope. Pronghorns, once common in the area, totally disappeared many years ago. In November of 1981 the Arizona Game and Fish Department reintroduced 51 Chihuahuan pronghorns from Texas. Their current population is estimated to be 70 to 80 animals. Among other larger mammals, both coyotes and mountain lions are found, and there is some evidence that black bears occasionally visit the area.

Three species of quail thrive in the area: Gambel's, scaled and Montezuma (the latter is also known as Mearn's and Harlequin). The grasslands are credited for this diversity. The Gambel's does not require much grass, the scaled needs medium grass and the Montezuma requires tall grass for survival.

The area is also high-quality raptor habitat. Ten hawk species have been inventoried, including the rare gray hawk and black hawk. Among other rare birds are the yellow-billed cuckoo, Baird's sparrow, Sprauge's pipit and northern beardless tyrannulet.

Reptile populations include the somewhat rare Mexican garter snake, along with the Gila monster, great plains skink and various common species. The riparian areas support amphibians such as the lowland leopard frog and the canyon tree frog.

While the grasslands are a dominant feature of the ranches, wildlife habitat and riparian areas are enhanced by impressive tree growth. Huge cottonwoods line the creek and proliferate elsewhere as well. The eastern, more hilly areas produce oak and juniper trees. Willow and velvet ash are also common and throughout the ranches are thick groves of mesquite, the so-called mesquite bosques.

In one secluded canyon stands a giant Emory oak which in 1986 was declared by the American Forestry Association to be the largest of its species growing in the United States on that date. The tree is 20 feet 5 inches in circumference, 43 feet tall and has a crown spread of 68 feet. It is listed on the National Register of Big Trees.

The Cienega Creek area has been inhabited by man for approximately 5,000 years. A late Archaic pithouse village, located in lower Matty Canyon, produced evidence of a hunting and gathering subsistence, possibly supplemented by agriculture. Archaic sites are also found in the Santa Rita foothills to the west.

By 500 A.D., the Hohokam, an agriculture-based people, had entered the area and occupied the terraces along major washes.

For the following millennium, populations expanded along the terraces and floodplains of Cienega Creek and its major tributaries. Large pithouse villages occupied the more attractive portions of the valley.

There is little evidence of human occupation in the area from ca. 1450 until Arizona territorial days. Cattle and sheep ranching began in the mid-1860s on what eventually became known as the Empire Ranch when purchased by Walter Vail in 1876. The ranch covered over 1,000 square miles during its peak operation. The original ranch house is now listed on the National Register of Historic Places.

Other historic activities include those associated with transportation and military operations. An old grade of the New Mexico and Arizona Railroad is intact at the southern end of Empire Ranch. It connected Nogales with Fairbank on the San Pedro River and facilitated the transport of cattle.

Currently, the Empire and Cienega ranches maintain 1,000 head of mother cows. The estimated carrying capacity is 12 head per section yearlong. The majority of the rangeland is in good condition and the apparent trend is upward. The general appearance of the rangeland is healthy; gullies are healing and perennial grasses cover most of the area.

The operator grazes his cattle in the higher country during the winter months because browse is present in that area. The lower area is grazed during the summer. During the summer the operator also rotates his cattle through a series of pastures along Cienega Creek to make desired use of Sacaton grass. The operator's method of grazing management appears to be working well.

Interim Management

Introduction

The *Federal Land Policy and Management Act of 1976* directs federal land management agencies to project present and future uses of public land by developing land use plans.

The planning process includes the use of inventory records and the results of public participation in deciding what uses of the land would best serve the public. Planning for the Empire-Cienega ranches is scheduled to begin in 1989.

For the period between June 1988 (the month of transfer to public ownership) and the completion of the comprehensive plan, it is necessary to develop interim management guidelines for protecting the ranches' resources and providing for public use of the area.

The following section is a draft of interim management guidance developed by the Phoenix District's management and specialists. With additional input from the Phoenix District's Advisory Council, a steering committee and a technical advisory committee made up of local citizens and representatives of state and local government agencies, the final guidance will direct management of the Empire and Cienega ranches over the short term.

I. Land Uses

A. ACCESS

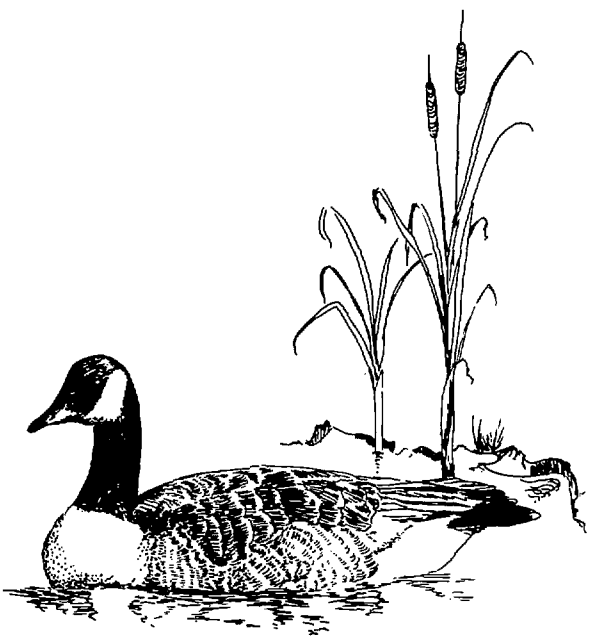
1. The public will be encouraged to use two primary access entrances into the ranches.

   The main entrance road off Highway 83 and the south entrance off Highway 82 will be signed to announce the area as the *Empire-Cienega Resource Conservation Area* administered by the BLM.

   Two other entrances into the ranches, one from the north and the other on the east, will remain open, but their use will not be encouraged or publicized as access to them passes through private land.

   All other entrances into the ranches will be closed to public access.

2. Vehicular travel within the ranches will be allowed on selected roads and routes. All other roads and routes will be closed to vehicular travel. Closed roads and routes will be appropriately signed.



B. AUTHORIZATIONS

1. All currently valid leases, grants and permits will continue to be honored until their expiration date. These include the current grazing leases and utility rights-of-way.
2. The acquired public land will not be subject to appropriation under the public land laws, including the mining laws.
3. Woodcutting will be authorized by permit only. Dead and down wood may be used for campfires when authorized (see No. 4 below).
4. No open campfires will be permitted during high or extreme fire danger periods (fire danger posted at signed entrances).
5. Camping will be allowed unless otherwise posted, but may not exceed stays of more than 14 consecutive days or more than 14 days within six consecutive months.
6. Hunting will be allowed as authorized under the laws and regulations of the State of Arizona, subject to the camping and access restrictions noted above.

II. Resource Management

A. WILDLIFE AND CULTURAL VALUES

All federal and state laws and regulations pertaining to the protection of wildlife, plant life and cultural properties will be applicable to the acquired public land. Particular emphasis will be placed on the protection of federally and state-listed species and significant cultural properties through periodic surveillance and monitoring.

B. WATERSHED

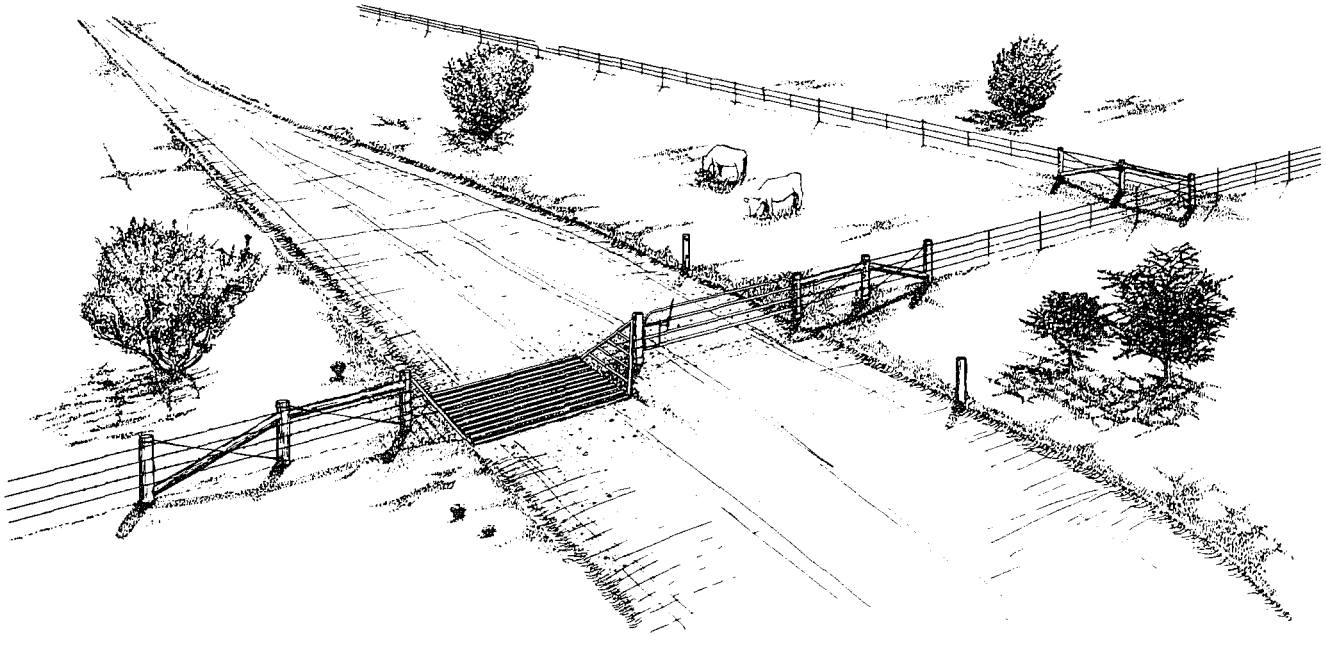
Interim protection for the watershed will consist of reducing vehicular travel over roads in erosion-prone areas. The exact roads and routes to be closed (signed) will be determined by the BLM.

III. Fire Suppression

During the fire season (normally March 15 to August 1), the BLM's Phoenix District will station a light engine (200-gallon) fire vehicle and a three-person crew at the Empire Ranch headquarters. The coverage provided will be seven days a week. Fires will be fully suppressed throughout the year, using local firefighting support if necessary. Proposals for prescribed burning and less than full suppression in some areas will be considered in planning scheduled to begin in 1989.

RANGER PATROLS

BLM Rangers will be available for periodic patrols of the property and will investigate any violations of federal law that may occur on federal land.



INDEX

INDEX

Air Quality 16
Alternative Formulation 8
Areas of Critical Environmental Concern (ACECs) 21,22,23
Areas of Cultural Significance 86

Communication Sites 20
Consultation and Coordination 99
Cooperative Recreation Management Areas 26,93

Desert Bighorn Sheep 24,30,90
Dessert Pupfish 30,90
Desert Tortoise 24,30,91

Environmental Issues 9
Environmental Management 17

Fire Management 17

General Management Guidance 13
Gila Topminnow 30,89

Hazardous Materials 17

Irreversible and Irretrievable Commitments of Resources 95
Issues Analyzed 7

Javelina 30,92

Land Tenure Adjustment 7,18
Land Classifications 9
Land Uses 13,83
Locatable Mineral Development 9,14,84

Mitigating Measures 95
Mule Deer 30,91

Off-Road Vehicle Use 7,26,93

Planning Area 6
Planning Issues 7
Planning Process Overview 8
Pronghorn 30,91
Proposed Resource Management Plan 17
Public Land Acres 7

Rangeland Management 14
Recreation and Public Purposes Act Land 14,26
Recreation Use 17,93
Riparian Habitat 30,87,88

Scoping and Public Participation 100
Short-Term Use Versus Long-Term Productivity ... 95
Soils 16
Special Management Areas 21,24,25
Special Status Plants 15,87,88

Threatened and Endangered Species 15,22,23,87,88,89,90

Unavoidable Adverse Impacts 95
Utility Corridors 20

Vegetation 87

Water Quality 16,29
Water Resources 16
Watershed Condition 29,85
Wild, Free-Roaming Burros 15,25,29
Wilderness 15
Wildlife 15,89

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