



P.O. Box 9175 | Missoula, MT 59807 | 406.542.2048 | wild@wildernesswatch.org | www.wildernesswatch.org

June 10, 2024

Bureau of Land Management
c/o NEPA Coordinator
SDNM Grazing RMP-EA 2024 Public Comments
2020 E Bell Road
Phoenix, Arizona 85022

Sent via email to: blm_az_pdo_sdnmgrazing@blm.gov

RE: Sonoran Desert National Monument Livestock Grazing Draft Resource Management Plan Amendment/Environmental Assessment

Dear NEPA Coordinator:

We are writing on the Sonoran Desert National Monument Livestock Grazing Draft Resource Management Plan Amendment/Environmental Assessment. Wilderness Watch is a national wilderness conservation organization focused on the protection of all units of the National Wilderness Preservation System, including the North and South Maricopa Mountains Wildernesses. Our work is guided by the visionary 1964 Wilderness Act (16 U.S.C. §1131-1136). We also refer you to the comments from Western Watersheds Project on this proposal, which we incorporate by reference. Based upon BLM's analysis, Alternative C, no grazing, is the only option that meets the letter and spirit of the monument proclamation.

By way of introduction, the issue of a separate, site-specific NEPA analysis needs further explanation. The plan amendment will determine if grazing is compatible with the Monument. However, this creates a two-step process that may violate NEPA because an adequate cumulative-impacts analysis had not been done and connected actions were not discussed in the EA. Thus, the decision point for cattle grazing is unclear. Is the paucity of analysis in this EA due to BLM's expectation that more analysis will occur at a later date? Given the controversy over this proposal, including scientific controversy where BLM has suggested that moderate grazing can improve range conditions, the BLM should consider an EIS if BLM intends to allow grazing to occur in the Monument.

Our past comments addressed Wilderness concerns in some detail. However, the new EA does not address crucial issues related to Wilderness. Past comments asked that specific points be addressed.¹ While the EA addresses some of the points in general, we can find few specific details for the North and South Maricopa Mountains Wildernesses. For example, the EA states with regard to the preferred alternative (Alternative E):

¹ Rather than repeat our past comments, we re-submit them and incorporate them into this document by reference.

Under the Ephemeral Use Only Alternative, livestock grazing would continue to be available on all allotments within the North and South Maricopa Mountains wilderness areas. Areas of concentrated past livestock use around infrastructure and water developments ha[ve] shown loss of vegetative cover through trampling and soil compaction. Any infrastructure such as water troughs or tanks, fencing, and access roads, in or within close proximity to wilderness areas has caused localized changes to the wilderness character of the site, but would not impact on the overall character of the Analysis Area. Dispersed livestock grazing in wilderness areas has a low potential to affect the areas naturalness and outstanding opportunities for solitude and primitive, unconfined recreation.

Fencing and cherry-stemmed livestock waters would continue to be maintained by permittees. The continuation of dispersed grazing use throughout wilderness areas would be long-term, adverse, and negligible given the large-scale (acres) of the wilderness areas and lack of water developments. Any adverse impacts could be avoided or reduced at the implementation-level by consideration of adjustments to livestock grazing management and range improvements consistent with BLM policies regarding the management of grazing in wilderness area.

EA at 52. That is the sum total of the analysis for that alternative in the wilderness section. Other alternatives are similarly sparse on pages 51 and 52, and the cumulative-effects analysis on Wilderness in EA, pages 73-75, is similarly sparse. There is no discussion of impacts to wilderness character.

The section of the EA quoted above deserves more discussion. Suggesting that grazing would have long-term, adverse, but negligible impacts on Wilderness is flawed.

For example, the idea that grazing won't affect most of the Wilderness (or other places in the northern half of the Monument) because cattle will concentrate around specific areas with water, and will not wander, is a tacit admission that BLM is creating sacrifice zones around the water developments. The irony here is the EA states the areas used by cattle are those close to water, which are the very areas that fail to meet BLM's land health standards.²

Put another way, BLM tries to justify grazing as compatible with the objectives of the Monument by highlighting the areas distant from a water source to support its suggestion that grazing is compatible with the objectives of the Monument designation. The national monument proclamation states “that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.”

The proclamation designating this national monument included all plant communities in a functioning desert ecosystem, from the saguaro cactus forests to tinajas (natural water holes) to washes, heavily used by birds during migration seasons. The water sources, while small in area, are a concentrated and crucial part of this desert ecosystem.

² See the rejection of an alternative that would close areas not meeting standards to livestock use due to impracticality on pages 11 and 12 of the EA. See also Appendix 4 at pages 16-19.

Only areas that are not grazed because of their distance from water, however, meet either land health standards or the proclamation. Because areas far from water—where grazing does not occur—meet the land health standards, and because areas close to water—where grazing is concentrated—fail to meet land health standards, grazing is almost certainly the main culprit for the environmental damage. Grazing continues to damage areas close to water. The only reason that BLM finds grazing is compatible with the monument is because BLM focused on areas far from water, where grazing doesn't occur and won't occur, which is the majority of acreage under consideration. That is hardly a justification for compatibility. Rather, it highlights why grazing is incompatible with the establishment of this monument. Because grazed areas cannot meet the land health standards, and meeting the land-health standards fulfills the reasons why the monument was created and is protected, grazing is incompatible with the monument. BLM has failed to acknowledge or discuss this.

There are more issues the BLM failed to address. The EA does not consider or analyze the likelihood of future water developments. Also, since grazing has not occurred for some time over much of the area, some of the fences are likely in disrepair. The EA does not indicate if motorized use would be used to build or rebuild infrastructure in Wilderness, deferring to a later site-specific NEPA analysis on an allotment-by-allotment basis.

Among other omissions, the EA's existing condition for Wilderness (page 50) does not reveal how much grazing takes place in Wilderness, whether livestock grazing patterns (numbers and geography) in Wilderness vary from year to year due to ephemeral water or forage, whether BLM has long-term range trend and use-data specific to the Wilderness, or whether motorized use takes place in Wilderness for grazing purposes.

The national monument proclamation states “that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.” Again, the only reason that BLM finds grazing is compatible is because grazing doesn't occur and won't occur in areas far from water, which is the majority of acreage under consideration. As noted above, that is hardly a justification for compatibility. In fact, it is justification for incompatibility of grazing.

BLM's preferred alternative is administratively impractical and will lead to more damage than the alternative recognizes. The ephemeral nature of the forage varies widely from year to year in this desert environment. The EA provided no baseline data or range of this variation. This makes administration of the allotments difficult, if not impossible, because a decision on the level of stocking would have to be made or adjusted very quickly to prevent overgrazing. Additionally, the livestock would need to be removed quickly when use exceeds thresholds, and BLM has not discussed its personnel capacity to execute this properly. BLM's preferred alternative is unworkable. Because it is unworkable, in practice, this alternative would likely resemble the maximum grazing alternative.

The upshot is information in the EA and associated documents clearly show that Monument should not be grazed by cattle (e.g. Appendix 4 at pages 16-19). The grazed areas, which are those close to water, fail to meet standards.

Thank you for considering our comments. Please keep us updated on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane". The signature is fluid and cursive, with the first name "Gary" written in a larger, more prominent script than the last name "Macfarlane".

Gary Macfarlane
-for-
Wilderness Watch
PO Box 9175
Missoula, MT 59807

Katie Bilodeau
Legislative Director/Policy Analyst
Wilderness Watch
PO Box 9175
Missoula, MT 59807