



WILDERNESS WATCH

Keeping Wilderness Wild

April 30, 2020

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Sent via email to: blm_az_pdo_sdnmgazing@blm.gov

RE: Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

Dear Range Management Specialist Whitbeck:

We are writing on the scoping letter for the Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated 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 did not receive an announcement for this plan amendment and only learned about it after the 30-day scoping period had expired. That is why we are sending this letter now. Please add Wilderness Watch to the mailing list to receive the draft NEPA document for public comment.

We looked over the materials on the website and noticed that the scoping letter mentions only that the RMP amendment would occur in Wilderness, but there is no discussion of Wilderness as an issue to be addressed in the NEPA document or plan amendment. This is a problem. The EA should consider the following questions and points:

- How much grazing takes place in Wilderness? Are the assumptions about livestock use and distribution (no more than 2 miles beyond water) field checked with regard to Wilderness?

- Do livestock use patterns in terms of numbers and geography grazed in Wilderness vary from year to year as the result of ephemeral water or forage?
- Does BLM have long-term range trend and use data on the Wildernesses?
- What are the impacts of grazing on wildlife, vegetation, and other attributes of the two Wildernesses within the plan amendment area?
- What nonconforming activities or uses (for example, motorized vehicles or range structures) are in Wilderness and what is the history and location of those activities? Do they vary from year to year?
- Similar to the above, are new developments or activities like motorized use being proposed in the Wildernesses under any alternative?
- Are the Wildernesses actually suitable for grazing? Please consider an alternative that ends grazing in Wilderness and other sensitive areas.
- Could allotment boundaries be modified to exclude Wilderness? We ask this question because the background materials suggest that over half of the amendment area has little or no probability for livestock grazing. The small scale of the maps in the background materials and the lack of wilderness boundaries on those maps make it difficult to provide specific comments at this stage. Thus, we ask that adequate maps be provided in the draft NEPA document and plan amendment.

Given the ephemeral nature of the forage that varies widely from year to year in this desert environment, we seriously question whether any livestock grazing is appropriate. That is an even more important issue because 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 Livestock Use Probability Map document states, “In general, livestock do not travel more than 2 miles from water on flat terrain and no more than 1 mile in rough terrain (Smith et al. 1986).” Class 5 areas are where livestock are not likely to be found because they are distant from water. The Land Health Evaluation, in a convoluted statement, acknowledges that livestock grazing is not compatible. It states:

Additionally, the majority (54.6%) of the SDNM Complex is mapped as livestock use probability Class 5 where it is unlikely that substantial livestock grazing has or would occur. Without the redevelopment and/or addition of new water sources, grazing is likely to remain compatible with monument objects in these areas.

In other words, the only reason that BLM finds grazing is compatible in those areas is because grazing doesn't occur or only rarely occurs. As noted above, that is hardly a justification for compatibility. In fact, it is justification for incompatibility of grazing. Further, BLM data do show resource damage in areas that are routinely grazed in the Monument. Therefore, it would seem the best course is to end grazing in the entire Monument.

Please keep us updated on this proposal.

Sincerely,

A handwritten signature in black ink, reading "Gary Macfarlane". The signature is written in a cursive style with a large, sweeping initial "G".

Gary Macfarlane
Board Member