12.0 COMMENTS AND RESPONSES TO COMMENTS

12.1 ORGANIZATION OF THE COMMENTS AND RESPONSES

This section summarizes comments made on the draft EIS for the BMGR INRMP and responses to those comments. As presented in Section 11.3.1, written and oral comments were received during the public comment period from two federal agencies, two state agencies and one state agency's representative, four local agencies and two local agency's representatives, four Native American groups, 10 non-governmental organizations, and 104 individuals. In order to analyze and address the issues raised in these public comments, each commenter was assigned an identifier based on the initials or abbreviations for the name of the individual, organization, or agency. Table 12-1 lists the commenter codes alphabetized by organization or individual and Table 12-2 lists the commenter codes alphabetized by code.

Many of these comments expressed personal opinions or general position statements, rather than substantive comments based on specific information or actions addressed in the draft EIS. Other letters included comments of a more specific nature. Comments were read and given codes based on the basic subject matter of each comment. The following 14 categories of public comment (which are in no particular order) were identified:

1. Roads and Vehicle Access
2. Wildlife Management/Wildlife-based Recreation/Threatened and Endangered Species
3. Camping/Wood Collection
4. Rockhounding
5. Public Safety, Military Mission, and Miscellaneous Recreation
6. Recreational Shooting
7. UDAs/Drug Smugglers/U.S. Border Patrol
8. Law Enforcement
9. Special Management Designations
10. Socioeconomics
11. Management Plan/EIS/Preferred Alternative
12. Land Use
13. Resource Inventory and Monitoring
14. Cultural Resources

Comment topics were identified within each of these 14 categories and coded by subcategory numeric codes (e.g., 1.1, 1.2, 1.3…14.1, 14.2, 14.3, etc.). The numeric code serves as a reference to comment issues and corresponding responses, and is combined in a master reference in Table 12-3. For example, the first issue on the topic of roads and vehicle access—to allow driving in dry washes—was coded as 1.1. All commenters who expressed that opinion in their testimony or letters are listed by comment code 1.1, and the INRMP Core Planning Team's response to that comment is listed in the Responses to Comments (see Section 12.4) as response code 1.1.

The comment letters and transcripts from the public hearings were demarcated with these codes and are presented in Section 12.3. Comments that expressed personal opinions or general position statements that require no response were not demarcated with a code in the letter or transcript. These comments were appreciated and will be considered by the decision makers even though pursuant to the CEQ NEPA-implementing regulations they did not require a response.

There are two ways that a commenter may find the responses to the substantive comments that they made on the draft EIS. First, the commenter could refer to the coding demarcated on their comment letter/transcript in Section 12.3 and refer to the corresponding response in Section 12.4. Second, the commenter could refer to Table 12-3 for those issues that have their commenter code (from Table 12-1) listed and refer to the corresponding INRMP Core Planning Team's response. For example, the comment to allow driving in dry washes was coded as Comment 1.1. Commenters who expressed that opinion in their testimony or letters would find content related to this issue in their comment letter or transcript demarcated with the code 1.1 and would also see their commenter code listed next to this identifier in Table 12-3.

12.2 ENDANGERED SPECIES ACT CONSULTATIONS

Consultations regarding the Sonoran pronghorn took place by letter, dated 14 June 2005 to address the impacts that may result from the proposed INRMP. A new Biological Opinion (BO) was issued on 26 August 2005 that concluded the proposed action is not likely to jeopardize the continued existence of the Sonoran pronghorn.

This consultation took place subsequent to completion of the draft EIS/INRMP public review and comment period. The findings in the BO substantiated previous USFWS findings and Volume II, Chapter 5.7 Environmental Consequences regarding the Sonoran pronghorn.

It was determined that the context of the consultation and BO were within the scope of the FEIS and did not provide new information relevant to the environmental concerns. It was further determined that results of the consultation and BO did not trigger the requirement for further public review, comment, supplementation, or recirculation of the FEIS.

12.3 COMMENTS ON THE DRAFT EIS

Comments on the draft EIS follow Table 12-3.

TABLE 12-1
INDEX TO COMMENTERS ALPHABETIZED BY AGENCY, ORGANIZATION, OR INDIVIDUAL'S LAST NAME

Written Comments

Federal Agencies

Environmental Protection Agency = EPA
Department of the Interior = DOI

State Agencies

Arizona Game and Fish Department = AGFD
Arizona State Historic Preservation Officer = SHPO

Local Agencies

Maricopa County Parks and Recreation Department = MCPR
Pima County Board of Supervisors = PC
Town of Gila Bend = GB
Yuma County Board of Supervisors = YC

Native American Tribes

Fort Mojave Indian Tribe, Ahamakav Cultural Society = FM
Yavapai-Apache Nation = YAN
Yavapai Cultural Preservation = YCP
Yavapai Prescott Indian Tribe = YPT

Non-Governmental Organizations

Ajo, AZ Reclamation Project = ARP
Arizona Desert Bighorn Sheep Society = ADBSS
Center for Biological Diversity = CBD
Defenders of Wildlife = DOW
Pecan Grove Garden Club = PG
Sierra Club, Grand Canyon Chapter = SC
The Land and Water Fund of the Rockies = LWF
Tucson Audubon Society = TA
Yuma Audubon Society = YA
Yuma Valley Rod and Gun Club, Inc. = YVRGC

Individuals

Anonymous = AN
Ruby Adams = RA
Buck Appleby = BA
Dale and June Baldwin = DJB
Robert Bargabos = RB
Sharon L. Bargabos = SLB
Sheldon R. Bedona = SB
Bill Berlat = BBE
Bob Boozer = BB
G.W. Brack = GWB
Michael Brick = MB
Lorna Brooks = LB
Bill Broyles = BBR
Richard A. Burkhardt = RAB
Ed Carpenter = EC
Chris Clayton = CC
John F. Colvin, Jr. = JFC
Dorothy Corp = DC
Bill Cox = BC
Adelle M. Decheine = AD
James M. Decheine = JD
Dave Devyak = DD
Brian F. Dolan = BD
Roy M. Emrick = RE
Ina Exon = IE
A. W. Ferguson = AF
Patrick Ferguson = PF
Ebert Fike = EF
Dennis Florence = DF
Ed Foster = EDF
Eddie Foster = EFO
Laurel Fowler = LF
Dirk Frauenfelder = DFR
Bob and Anna Frazier = BAF
Jerry Gauthier = JG
Clifford Gaylin = CG
Darlene Gaylin =DG
Donny Gray = DGR
Rome Hamner = RH
Larry Hardt = LH
Trae Hardt = TH
Bonnie Hausner = BH
Jim Hausner = JH
Mark Haynes = MH
Pat Headington = PH
Brent Herndon = BHE
Bryan Herndon = BRH
Bill Hook = BLH
Gary W. Kaitting = GK
John F. Kehring = JK
John F. Kehring III = JFK
Alan L. Krieger = AK
Pam Landin = PL
Lainie Levick = LL
Andy E. Lopez = AL
Jay Marks = JM
Dale M. Marler (representing People for the USA) = DMM

Individuals (cont.)

James E. Marquardt = JEM
Edward Steven Martinez = EM
Sandy and Rick Martynec = SRM
Brandon Mattausch = BMA
Dave Mattausch = DM
William Mattausch, Sr. = WM
Alice McNary = AM
J.P. Melchionne = JPM
Clinton D. Miller = CDM
Jeff Miller = JMI
Chris C. Mitchell = CCM
Billy Morgan = BM
Mike R. Morgan = MM
Paul E. Morris = PM
Jim Notestine = JN
Steven and Lupe Ownby = SLO
Luceil Opp = LO
Edward Pakkala = EP
Tyler Parsons = TP
Fred Powell = FP
George A. Reiners = GR
Billie F. Riner = BR
Joan B. Riner = JBR
David Root = DR
John E. Rusin = JR
Budd Shaff = BS
Larry Smart = LS
Richard Spotts = RS
Norman Stanford = NS
Edward Stone = ES
Tom Taylor = TT
John Vance = JV
Henrietta Van Zwol = HVZ
Michael Walker = MW
Norma Walker = NW

Yuma

John Capps = JC
Jon Fugate, Yuma Valley Rod and Gun Club = JF
Gail Gallagher, Yuma County = GG
Paul Johnson, private citizen and Yuma City Council = PJ
Cary Meister, Yuma Audubon Society = CM
Joe Melton, Arizona Game and Fish Commission = JME

Ajo

Ralph Delisle = RD
L.J. Dutcher = LD
Donnie Ebann = DEB
Morris Nelson = MN
Lee Price = LP
Marvin Silva = MS

Sells

No comments received

<u>Oral Comments</u>

Glendale

No comments received

Tucson

Brian Dolan, Southern Arizona Bighorn Sheep Society = BD

Gila Bend

David Evertsen = DE
Steven Holt = SH
James Marquardt = JEM

TABLE 12-2
INDEX TO COMMENTERS ALPHABETIZED BY ABBREVIATION

AD = Adelle M. Decheine
ADBSS = Arizona Desert Bighorn Sheep Society
AF = A. W. Ferguson
AGFD = Arizona Game and Fish Department
AK = Alan L. Krieger
AL = Andy E. Lopez
AM = Alice McNary
AN = Anonymous
ARP = Ajo, AZ Reclamation Project
BA = Buck Appleby
BAF = Bob and Anna Frazier
BB = Bob Boozer
BBE = Bill Berlat
BBR = Bill Broyles
BC = Bill Cox
BD = Brian F. Dolan
BH = Bonnie Hausner
BHE = Brent Herndon
BLH = Bill Hook
BM = Billy Morgan
BMA = Brandon Mattausch
BR = Billie F. Riner
BRH = Bryan Herndon
BS = Budd Shaff
CBD = Center for Biological Diversity
CC = Chris Clayton
CCM = Chris C. Mitchell
CDM = Clinton D. Miller
CG = Clifford Gaylin
CM = Cary Meister, Yuma Audubon Society
DC = Dorothy Corp
DD = Dave Devyak
DEB = Donnie Ebann
DF = Dennis Florence
DFR = Dirk Frauenfelder
DG = Darlene Gaylin
DGR = Donny Gray
DJB = Dale and June Baldwin
DM = Dave Mattausch
DMM = Dale M. Marler
DOI = Department of the Interior
DOW = Defenders of Wildlife
DR = David Root
EC = Ed Carpenter
EDF = Ed Foster
EF = Ebert Fike
EFO = Eddie Foster
EM = Edward Steven Martinez
EP = Edward Pakkala
EPA = Environmental Protection Agency
ES = Edward Stone
FM = Fort Mojave Indian Tribe, Ahamakav Cultural Society
FP = Fred Powell
GB = Town of Gila Bend
GG = Gail Gallagher, Yuma County
GK = Gary W. Kaitting
GR = George A. Reiners
GWB = G.W. Brack
HVZ = Henrietta Van Zwol
IE = Ina Exon
JBR = Joan B. Riner
JC = John Capps
JD = James M. Decheine
JEM = James E. Marquardt
JF = Jon Fugate, Yuma Valley Rod and Gun Club
JFC = John F. Colvin, Jr.
JFK = John F. Kehring III
JG = Jerry Gauthier
JH = Jim Hausner
JK = John F. Kehring
JM = Jay Marks
JME = Joe Melton, Arizona Game and Fish Commission
JMI = Jeff Miller
JN = Jim Notestine
JPM = J.P. Melchionne
JR = John E. Rusin
JV = John Vance
LB = Lorna Brooks
LD = L.J. Dutcher
LF = Laurel Fowler
LH = Larry Hardt
LL = Lainie Levick
LO = Luceil Opp
LP = Lee Price
LS = Larry Smart
LWF = The Land and Water Fund of the Rockies
MB = Michael Brick
MCPR = Maricopa County Parks and Recreation Department
MH = Mark Haynes
MM = Mike R. Morgan
MN = Morris Nelson
MS = Marvin Silva
MW = Michael Walker
NS = Norman Stanford
NW = Norma Walker
PC = Pima County Board of Supervisors
PF = Patrick Ferguson
PG = Pecan Grove Garden Club

PH = Pat Headington
PJ = Paul Johnson, private citizen and Yuma City Council
PL = Pam Landin
PM = Paul E. Morris
RA = Ruby Adams
RAB = Richard A. Burkhardt
RB = Robert Bargabos
RD = Ralph Delisle
RE = Roy M. Emrick
RH = Rome Hamner
RS = Richard Spotts
SB = Sheldon R. Bedona
SC = Sierra Club, Grand Canyon Chapter
SH = Steven Holt
SHPO = State Historic Preservation Officer
SLB = Sharon L. Bargabos
SLO = Steven and Lupe Ownby
SRM = Sandy and Rick Martynec
TA = Tucson Audubon Society
TH = Trae Hardt
TP = Tyler Parsons
TT = Tom Taylor
WM = William Mattausch, Sr.
YA =Yuma Audubon Society
YAN = Yavapai-Apache Nation
YC = Yuma County Board of Supervisors
YCP = Yavapai Cultural Preservation
YPT = Yavapai Prescott Indian Tribe
YVRGC = Yuma Valley Rod and Gun Club

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
1.0	**Roads and Vehicle Access**	
1.1	Allow driving in dry washes	ADBSS, BD, GK, JEM, JF, JFK, JK, MM, PM, TP, YVRGC
1.2	Do not allow driving in washes	CBD, CM, DOW, JN, LL, LWF, RE, RH, SC, SRM, TA, YA
1.3	Minimize recreational driving in washes to protect water quality	EPA
1.4	Support Alternative A or B for motorized public access and unroaded area management unless Alternative C, the proposed action, is modified per Yuma Valley Rod & Gun Club recommendations	ADBSS, AGFD, AK, AL, ARP, BAF, BBE, BD, BDO, BRH, CCM, CDM, DD, DF, DGR, DJB, DOI, EC, EDF, EFO, EM, EP, GR, IE, JEM, JF, JFC, JM, JMI, JR, JV, LD, LH, LS, MH, MN, MW, NS, NW, PF, PM, TP, YVRGC
1.5	Support Alternative A or B for motorized public access and unroaded area management	AD, ADBSS, AM, AN, ARP, BA, BB, BC, BH, BHE, BLH, BM, BMA, BCC, BR, BS, CC, CDM, CG, DC, DEB, DG, DGR, DJB, DMM, DR, EFO, EP, ES, FP, GK, GR, GWB, HVZ, IE, JBR, JD, JEM, JFK, JG, JH, JK, JF, JM, JMI, JPM, JR, LF, LO, MH, MM, MN, MW, NS, NW, PH, PF, RA, RAB, RB, SB, SH, SLB, SLO, TH, TT, YVRGC
1.6	Support Alternative C, the proposed action, for motorized public access and unroaded area management	CBD, CM, RS
1.7	Support Alternative D for motorized public access and unroaded area management	CBD, CM, DOW, JN, LL, LWF, RE, RH, RS, SC, TA, YA
1.8	Do not restrict existing or new roads to government use only, unless it is for specific safety or security purposes	ADBSS, DOI, JEM, JR, MH, YVRGC
1.9	Conserve roadless areas, increase their size, and revegetate unneeded roads	CBD, CM, DOW, JN, LWF, RH, SC, TA, YA

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
1.10	The commenters all support closure of redundant roads but vary widely in their viewpoints as to what constitutes redundancy	ADBSS, ARP, BBE, CBD, DFR, DOW, JEM, JF, JM, JN, LB, LD, LWF, MH, PG, RH, RS, SC, TA, YVRGC
1.11	Manage/don't manage roadless areas as wilderness	AF, BBE, CBD, DOW, JM, JN, LF, LWF, SC
1.12	Don't limit the number of vehicles in a single party	ADBSS, BD, DM, EF, GWB, JEM
1.13	Limit drivers to roads signed as open to implement road closures	ARP, CBD, DOW, JN, LWF, PL, SC, SH, TA, YA
1.14	Do not close historically significant roads	MH, YVRGC
1.15	There are no alternatives that would increase public access	ADBSS, ARP, AM, BB, BBE, BR, BS, CDM, CG, DG, DGR, JBR, JEM, LB, LO, LWF, MW, RH, RS, SC, YVRGC, NS, NW
1.16	Investigate illegal road closures on the BMGR over the past several months	ARP, DJB, IE, NS, MW, NW, RD, SH
1.17	Draft EIS maps were intentionally designed with road omissions in Area B and to be hard to read	ARP, IE, DJB, JM, MW, NS, NW
1.18	Resist pressure to open more roads to public access to avoid environmental damage	CBD
1.19	Requiring four-wheel drive vehicles is overly restrictive; advisory information should be adequate	JFC
1.20	Restricting access and use is needed to protect resources if use cannot be otherwise controlled	DOW
1.21	Continue to keep the BMGR closed to public off-road driving and racing	CBD, DFR, DOW, LWF, SRM, YA
1.22	Plan does not provide for a comprehensive inventory of the wash system	CBD, DOW, LWF, RH, SC, TA
1.23	These comments generally objected to access closures, with many of them specifically objecting to the closure of the "line road" in the southwest corner of Area B	AD, ADBSS, ARP, BBE, BD, CC, DGR, DJB, FP, IE, JR, LD, MN, MS, MW, NS, NW, RB, SH
1.24	Are there any plans to maintain public use roads?	PL
1.25	Control/support use through permits, special use permits, education, scheduling, and range consolidation; don't use road or area closures to control use	ADBSS, ARP, BBE, BD, BLH, BMA. CC, DGR, DJB, IE, LD, MN, MW, NS, NW, RB, TP

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
1.26	Remove the references to "Roads Needed For Public Entry, Needed For Refuge Management, Not Needed For Refuge Management, and No Refuge Access" from Figures 3-1 and 3-2	DOI
1.27	Support creating bypass roads to protect the Cabeza Prieta Wilderness	ADBSS, LWF
1.28	The number/miles of roads on the BMGR have increased enormously over the last 25 years; most within the last 15 years	LWF, MH, SC
1.29	The roads on the range have been there for a long time	AM, BB, BH, BR, BS, DG, DR, CC, CDM, CG, JBR, JH, LO, MH, MS, MW, NS, RA, SLB
1.30	Require all vehicles used by visitors to be street legal and prohibit off-road vehicles	CBD
1.31	Greater and more widespread public use of the BMGR could interfere with military training and damage the environment	CBD, JN, YA
1.32	Evaluate moving the east boundary of the East Tactical Range to the west to allow public access to the Paradise Well area	ADBSS, BD, JF, YVRGC
1.33	Many currently popular desert tours through BMGR—East will simply be eradicated along with a large portion of the only truly resilient commodity in the area, Desert tourism	ARP
1.34	More restrictions or conditions on public access are better now in that access could always be increased or liberalized latter	GB
1.35	Keep public access as practical as possible while enhancing the range environs but prohibit construction of new public access roads and restore closed or unused roads	GB
1.36	Delete or clarify the sentence on page 3-31, paragraph 2, of the draft EIS that begins with "Washes are currently part of …"	AGFD
1.37	Revise the sentence on page 3-31, last paragraph 2, of the draft EIS that begins with "Additionally, the road network transportation planning initiated …"	DOI
1.38	Delete the statement on page 59 of the community report that states, "and potentially allowing future motorized access to currently restricted areas."	AGFD
1.39	Selection of either Alternative A or B would not result in long-term adverse ecosystem effects	AGFD
1.40	All roads should be surveyed for cultural resources prior to allowing recreation and prior to deciding which road should be left open and which should be closed.	SHPO

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
2.0	**Wildlife Management/Hunting**	
2.1	General and specific comments of support for continued game management programs on the BMGR	BBE, BMA, CC, DM, DMM, JF, PF, YC, YRGC
2.2	Continue existing (AGFD) game management programs	ADBSS, DM
2.3	BLM does a good job of managing the range as far as the livestock goes	LP
2.4	More relaxed administrative restrictions on habitat improvements would allow for increased management benefits for wildlife	PG
2.5	Commenters supported AGFD management of wildlife in general and specifically with regard to wildlife water developments	BBE, DM, SH
2.6	Commenters supported Arizona Desert Bighorn Sheep Society (and, in one case, also the Arizona Antelope Foundation) contributions to wildlife water management	BMA, DM, JF
2.7	Commenters supported maintenance of existing waters	ADBSS, BD, BLH, SH
2.8	Commenters supported construction of wildlife waters	ADBSS, BD, BLH, DM, JEM, JR, WM
2.9	Commenters noted that water is good for wildlife, others were more specific in stating that water is key to successful game populations	BMA, DM, WM
2.10	Include redevelopment of existing waters as a maintenance and repair function	ADBSS
2.11	The discussion of wildlife water developments includes herpetofauna species that do not occur on the BMGR	LWF
2.12	The draft EIS does not provide a description of the location and timing of the wildlife water developments or how these decisions will be made	DOW
2.13	The document fails to acknowledge the controversial and unproven nature of artificial water developments and ignores that no published study shows a predictable increase in wildlife after a water catchment	LWF
2.14	Correct language in Section 3.1 regarding development of new permanent wildlife waters to better reflect the language of the proposed action	AGFD, DOI
2.15	On Page 4-143 of the draft EIS, change the "may" to "will" in the statement "Wildlife that may use open water on the range…."	DOI
2.16	Do not limit wildlife developments to six within the first 5 years of the INRMP	ADBSS, JEM
2.17	Delete the statement on page 59 of the community report that states: "On these terms, Strategy B may be less beneficial than the proposed action."	AGFD

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
2.18	Do not place a moratorium on wildlife water developments or suspend wildlife water developments after the first five years of the IRNMP until the definitive study proves value and benefit	ADBSS, BBE, BD, JR, LD
2.19	Recommend a 10-year moratorium on water developments until existing catchments can be appropriately monitored and studies prove their efficacy	LWF
2.20	Modifications made at Sauceda Pothole can trap animals	YCP
2.21	Substantiate that game animals historically moved to the Gila or Sonoyta rivers in time of drought (or other unsubstantiated arguments for the need for supplemental waters) or remove these suppositions	LWF
2.22	Current and future wildlife water development should comply with AGFD standards in Wildlife Water Developments in Arizona: A Technical Review (1997)	LWF
2.23	Extend prohibition of camping within one-quarter mile of natural and developed waters to also prohibit hunting to protect wildlife that depend on these water sources for survival	DOW, LWF
2.24	Development of natural water features may have cultural resource impacts	SHPO, YCP
2.25	Litter observed around water sites affects wildlife	YAN
2.26	Recreational shooting has adverse impacts to wildlife/habitat	DOW, JN, LL, LWF, RE
2.27	Some recreation use has harassed wildlife	BBR
2.28	Continued closure of the BMGR to off-road driving is critical to maintaining healthy wildlife and plant communities	LWF
2.29	Commenters noted the importance of and their support for hunting as a wildlife-oriented recreational activity	BA, BBE, BBR, BMA, CC, CCM, DM, DMM, DR, JF, JG, JMI, PF, RE, TP, YC, YRGC
2.30	Allow deer hunting on the BMGR	DM
2.31	More open space is needed for hunters, not more withdrawn for parks or refuges	AF
2.32	Hunters clean and improve the area for wildlife	JMI
2.33	Do not establish a special hunting permit program that requires a fee	ADBSS
2.34	Hunting should be limited to reduce stress to wildlife populations, ensure hunted species are able to reproduce, and ensure that wildlife can migrate without interference	LB, LL
2.35	Eliminate/prohibit non-game species collection (except for scientific purposes)	CBD, CM, JN, RE, YA

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
2.36	It is a fundamental biological law that you cannot have an excess of predators unless there are prey species in excess, who determines who can hunt predators	YAN
2.37	Invasive exotic plants can be introduced and spread as a result of roads providing access to remote areas	RS
2.38	Few of the data gaps identified for wildlife and vegetation appear again as management strategies to be pursued during the life of the plan	LWF
2.39	Commenters expressed support for Sonoran pronghorn management actions	JEM, JME, PJ
2.40	Development of highways/railroads has had the effect of creating a biological island that restricts Sonoran pronghorn from where they would naturally go to seek food and water	JEM, JFC, PJ
2.41	Note that management of federally listed endangered species is a responsibility that AGFD shares with the USFWS	DOI
2.42	Old wells could be reactivated to provide water and food could be hauled in for antelope and other animals during drought	LP, RD
2.43	Range managers should have been allowed to provide water and food for the Sonoran pronghorn during the recent drought	PJ
2.44	Internal fences left over from historical ranches should be removed to improve Sonoran pronghorn (and other species) mobility	PL
2.45	Defenders of Wildlife urges designation of one or more special natural/interest areas for the Sonoran pronghorn	DOW
2.46	The draft EIS fails to (1) integrate the various components of resource management that affect the Sonoran pronghorn into a meaningful plan to address the species plight and (2) describe potential elements of such a plan, including what actions will be taken, why, when, and how	DOW
2.47	Presentation of measures required by the Sonoran Pronghorn Biological Opinions and Recovery Plan as something separate from Sonoran pronghorn management under the INRMP may violate NEPA and ESA	DOW
2.48	With respect to road closures, Strategies A and B do not meet the terms of the current Biological Opinions for Sonoran pronghorn and, thus, do not qualify as "reasonable" under NEPA and would violate the Endangered Species' Act take and no jeopardy provisions	DOW

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
2.49	The draft EIS does not reference or address the consultation that the agencies are purportedly engaged in at the current time pursuant to a stipulated agreement reached with the plaintiffs in Defenders of Wildlife v. Norton	DOW
2.50	Treatment of predator control in the INRMP is incredibly vague	DOW
2.51	Various commenters expressed concerns about the potential impacts of Yuma ASH to flat-tailed horned lizard and flat-tailed horned lizard habitat	CBD, DP, JN, LL, LWF, RE, YA
2.52	Top threats to wildlife come from growing recreation, off-road vehicle use, and border law enforcement and migration activity	CBD, TA
2.53	Limits on group sizes may unintentionally thwart future wildlife conservation activities	ADBSS
2.54	Bat gates for mines need to be designed to allow for use by barn owls, fox, ring-tailed cats, and bighorn sheep	GG
2.55	Commenters expressed support for the proposal to prevent the public from entering mines on the BMGR to protect bats	CBD, CM, DOW, JN, RE, YA
2.56	Fences need to be maintained to control cattle	LP, RD
2.57	Wild burros are damaging the environment	DEB
2.58	Vehicle use in washes harm wildlife and habitat – washes are used as wildlife corridors	CBD, DOW, LL, LWF, RE, RH, SC
2.59	Vehicular travel in accessible dry washes is the most ecologically benign form of access	BD, JEM
2.60	Wildlife benefit from larger unroaded areas (including Sonoran pronghorn, bighorn sheep, mountain lion)	CBD, DOW, JN, LWF, PC, SC, YA
2.61	Although severe drought is currently a major concern, Sonoran pronghorn are ultimately adapted to survive in harsh desert conditions, and the real problem lies in actions that have compromised this species' normal ecological strategies for coping with drought. Current threats to the Sonoran pronghorn stem from government agency activities.	DOW
2.62	What concrete steps have been taken by DoD to protect/mitigate flat-tailed horned lizard habitat and implement the 1997 Management Strategy and what other steps are under consideration?	DOW
3.0	**Camping/Wood Collection**	
3.1	Allow vehicle-based camping within 100 feet of roads	ADBSS, BD, BLH, FF, JEM, JF, JFC, JK, LB, PM, YVRGC
3.2	Restrict vehicle camping to within 50 feet of roads	CBD, CM, DOW, JN, RE, SHPO, SRM, YA

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
3.3	Remove the no overnight camping restrictions within the Mohawk Mountains in Management Unit 4 and on the east side of the Sauceda Mountains in Unit 6	ADBSS, BD, BLH, JEM, JR
3.4	Prohibit camping within one-quarter mile of natural or developed waters	DOW
3.5	Ban collection of dead and down wood	CBD, JN, PL, RE, YA
3.6	Allow the use of dead and downed wood for campfires	BD, BLH, DMM, JEM, SRM
3.7	Monitor wood supplies	SRM
3.8	Commenter supports a 7-day stay, 28-day wait limit on camping stays	SRM
3.9	Commenter supports prescribing rules for waste disposal	SRM
3.10	Commenter does not want new restrictions on camping	GWB
3.11	Commenter is opposed to woodcutting	SRM
4.0	**Rockhounding**	
4.1	Rockhounding should not be prohibited	ARP, DMM
4.2	Prohibit rockhounding	SHPO, SRM
4.3	Define the frequency of how often rockhounders could collect up to 25 pounds of rocks and how will it be enforced?	PL
5.0	**Public Safety, Military Mission, and Miscellaneous Recreation**	
5.1	Prohibit public entry to mines	CBD, CM, DOW, JN, RE, YA
5.2	Include Buckeye Hills Recreation Area in the recreation section	MCPR
5.3	Recreational use of the range may only occur if it is sustainable in relation to the environment and only if it is consistent with the military mission	BBE, BBR, CM, JN, PC, PJ, RE, YC
5.4	Identify incidents when public activities and trespass have forced military missions to be canceled	YAN
5.5	Comments expressed general support for the military and/or support for military use/management of the BMGR	AF, BBR, BD, DR, JC, JF, JM, JPM, LB, LL, MH, PF, PJ, RE, SB, YRGC
5.6	Commenters generally support continued requirement for permits	ADBSS, DF, JEM, JPM, LWF
5.7	Address geocaching, vehicle racing, large groups, survivalist activities, militia training in EIS (opposed to all of these)	LWF, YAN
5.8	Prohibit metal detectors	SRM
5.9	Few of the identified data gaps for recreation (e.g., data on recreation use, hunting activity levels) appear as management strategies for recreation	LWF

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
6.0	**Recreational Shooting**	
6.1	Recreational shooting should not be allowed on the BMGR. Not even the military trains on the BMGR with small arms.	CBD, DOW, JN, LB, LL, LWF, RE, SHPO, SRM, YA
6.2	Our club would like support from MCAS Yuma to continue to conduct recreational shooting with fully automatic weapons with a special use permit	JC, MB
6.3	Identify incidents where recreational shooting has affected military missions, Border Patrol activities, or the public	YA
6.4	If recreational shooting is allowed, designate areas for this activity as well as a maintenance and clean-up plan	PL
6.5	Consider placing limits on the size of weapon that can be used and the elevation at which the weapon could be fired	LB
6.6	The special use permit to shoot fully automatic weapons could be a bunch of red tape that effectively eliminates the opportunity to use fully automatic weapons	JC, MB
7.0	**UDAs/Drug Smugglers/U.S. Border Patrol**	
7.1	UDA and drug smuggler traffic is the source of most of the off-road driving and other types of non-military use impacts; don't close existing roads to public access until the UDA/smuggler problem is solved	AF, AK, BA, BHE, BM, CBD, CC, DEB, DF, DGR, DR, EC, EF, EP, ES, GK, JFK, JK, JPM, JV, LS, MH, MM, PF, PH, PJ, PM, SB, TP
7.2	Deal with the trash left behind by UDAs and smugglers	MM, YAN
7.3	A prohibition against vehicle use in washes should apply in equal force to Border Patrol activities	CBD, LP, LWF, RD
7.4	Damage from illegal use of the range is not discussed in the draft EIS	CBD, DOW, JN, SC, TA
8.0	**Law Enforcement**	
8.1	While Strategy D was not selected for all management units, the de facto strategy would be for retaining a minimum of six law enforcement positions	DOI, SRM
8.2	Increasing enforcement of existing laws and regulations is the only alternative for lessening or eliminating sources of environmental damage	CBD, MH
8.3	Describe the role that the military will have in enforcing range policies	LWF
8.4	Law enforcement officers should have Archaeological Resources Protection Act (ARPA) training so they have the authority to arrest pothunters and vandals	SHPO

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
9.0	**Special Management Designations**	
9.1	The draft EIS does not identify prescribed management objectives for special natural/interest areas	DOW, LWF, YA
9.2	Redesignate the Flat-tailed Horned Lizard Habitat Management Area and the Areas of Critical Environmental Concern that were established by the BLM	CBD, CM, JN, YA
9.3	Protect and redesignate the Special Recreation Management Areas; these areas need more specific management prescriptions than the Plan proposes	CM, JN, LWF, YA
10.0	**Socioeconomics**	
10.1	A Record of Decision must not be made solely on the incomplete and biased analysis; an economic impact statement must be mandated	ARP, DJB, IE, MW, NS, NW
10.2	Tourism is important to the economy of Ajo	AM, ARP, BB, BH, BR, BS, CDM, CG, DG, FP, JBR, JH, LF, LO, LP, MW, NS, NW, RA, SLB
10.3	The proposed action and, in particular, proposed road closures would effect/devastate Ajo, Why, and Lukeville economically	AD, AM, ARP, BB, BH, BR, BS, CDM, CG, DC, DG, DJB, FP, IE, JBR, JD, JH, LF, LO, LP, MN, MW, NS, NW, PF, RA, SLB, SLO
10.4	These comments consist of various testimonials about the value of the desert environment to the local lifestyle	AD, BAF, BBR, CCM, DC, EP, HVZ, JD, LF, LL, MH, MN, SLO
11.0	**Management Plan/EIS/Preferred Alternative**	
11.1	Draft EIS lacks concrete plans with specific goals, objectives/standards/guidelines, budgets, and schedules for managing the natural and cultural resources of the BMGR	BBR, CBD, DOW, LL, LWF, RE, RH, SC, TA, YA
11.2	The draft EIS presents a plan to write a plan	CBD, LWF
11.3	Pima County Board of Supervisors supports Alternative D	PC
11.4	Yuma County Board of Supervisors supports Alternatives A or B for public access, recreation, and hunting	YC
11.5	Make the final document more concise and easier to read	JF, YVRGC
11.6	The draft INRMP, as reflected in the draft EIS, does not integrate activities and management measures, particularly in regards to Sonoran pronghorn, as required by the Sikes Act	DOW
11.7	The draft EIS fails to recognize that the Sikes Act provides that wildlife concerns must take precedence over public use; public use is allowed only to the extent that it does not impair the sustainability of resources under the MLWA of 1999	BBR, CBD, CM, DOW, JN, JF, RE, RS, YA

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
11.8	The draft EIS should clearly state and that all actions undertaken by the military, other agencies, and the public on the BMGR must comply with applicable natural resources law	DOW
11.9	Alternative D is the most reasonable, prudent, and sustainable option for the proposed INRMP management framework	CBD, DOW, JN, LL, LWF, RE, RH, RS, SC, TA, YA
11.10	Alternative A, the no-action alternative, or Alternative B are the most appropriate options for the proposed INRMP management framework	ADBSS, ARP, BRH, CC, DEB, DJB, DMM, EDF, EP, FP, IE, JEM, JF, JFK, JPM, JR, LF, MB, MW, NS, NW, TH, YVRGC
11.11	Alternative C is the most appropriate option for the proposed INRMP management framework	JFC
11.12	The proposed action is the most appropriate option for the proposed INRMP management framework	PL
11.13	There should be a public input period on the INRMP action and monitoring plans, budgets, and implementation schedules before they are adopted	DOW, YA
11.14	The Defenders of Wildlife felt strongly that urgent action is needed to address the plight of the Sonoran pronghorn but also believe that such action must be taken only after opportunity for and consideration of public input	DOW
11.15	Management Strategy C is the proposed action	EPA
11.16	The draft EIS cumulative effects analysis is insufficient	DOW, SC
11.17	The Defenders of Wildlife incorporate their comments, which pertain to cumulative impacts on the Sonoran pronghorn, on the draft Yuma Training Range Complex Supplemental EIS by reference	DOW
11.18	Specific plans are needed to monitor, enforce, and control public use to insure that it is sustainable	RE, RS, YA
11.19	The Community Report is blatantly biased and focuses on a lame interpretation of the Military Lands Withdrawal Act of 1999 rather than the mandates of the Sikes Act	ARP, RA
11.20	Do not make changes in management or public use; the BMGR is not broken and its resources are generally undamaged	AM, ARP, BB, BH, BR, BS, CDM, CG, DC, DG, DR, JBR, JD, JH, LO, MW, NS, NW, RA, RB, SLB, SLO, TP
11.21	Provide for an ombudsman, public range review board, and periodic tours of closed range areas	LWF
11.22	The INRMP must include a Five-Year Defense plan budget	LWF

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
11.23	Management of the BMGR should be consistent/coordinated with that of the Cabeza Prieta NWR and Sonoran NM and other adjacent or nearby land areas	JN, LWF
11.24	Alternatives A and B are not consistent with the MLWA of 1999 or DoD Instruction 4715.3 and should be rejected	YA
11.25	You don't live here (Ajo) and shouldn't interfere in what shouldn't concern you; stay away and let us live, no actions are necessary	AD, DC, JEM, RD
11.26	The fifth management strategy, the proposed action, is not described	RD
11.27	The BMGR is a military range; do not manage it as a de facto national park or wilderness	AF, AM, BB, BBE, BD, BH, BR, BS, CDM, CG, DG, JBR, JFC, JH, JM, JR, LO, LF, MW, NS, NW, RA, SLB
11.28	It is imperative that a fair, honest and unbiased study be mandated before any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why, and Lukeville from public access to the desert that surrounds them	ARP, DJB, IE, MW, NS, NW
11.29	We resubmit and incorporate by reference herein, our November 2000 comments, we urge the agencies to address and consider the points raised in these incorporated comments	LWF
12.0	**Land Use**	
12.1	The Yuma Area Service Highway should not be constructed through the BMGR	CBD, CM, DOW, JN, LL, LWF, RE, YA
12.2	Yuma County would like to see the Area Service Highway as a priority for consideration	GG
12.3	Mineral extraction and sand and gravel operations should not be allowed	RE, RS, YA
12.4	The EIS does not acknowledge some projects and new ordinances in Yuma County	GG
13.0	**Resource Inventory and Monitoring**	
13.1	These commenters stated that a monitoring plan and/or schedule should be included in the EIS and some stated that the draft EIS fails to disclose adequate monitoring commitments as NEPA requires	LL, LWF, RE, YA
13.2	The draft EIS fails to consider monitoring objectives or opinions recommended by reputable scientists in The Nature Conservancy Report (Hall and others 2001) as NEPA requires	LWF
13.3	Identified gaps in information were not translated into written strategies for conducting inventories that would obtain the needed data	LWF, YA
13.4	The draft EIS fails to acknowledge the value of monitoring for ecosystem health as NEPA requires	LWF
13.5	The draft EIS fails to consider benefits of monitoring across social boundaries as NEPA requires	LWF

TABLE 12-3
COMMENT CATEGORIES

Comment Number	Comment	Commenter(s)
13.6	Plans for coordinating with adjacent land managers on resource inventory and monitoring are missing	LWF
13.7	Commenters support a monitoring plan that would provide key indicators that are truly representative of the BMGR ecosystem and that would trigger timely corrective actions	CBD, CM, JN, YA
14.0	**Cultural Resources**	
14.1	Protect the cultural resources of the BMGR	ARP, CBD, JN, LL, LWF, RE, RH, SC, SHPO, YA, YAN
14.2	The DoD needs to consult with SHPO and the Tribes regarding the INRMP EIS, the ICRMP, and various potential management actions.	SHPO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

May 6, 2003

Colonel James R. Uken, Director
56th Range Management Office
U.S. Air Force
ATTN: Captain Stephanie Dawley
P.O. Box 67132
Phoenix, AZ 85082

Dear Colonel Uken:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the ***Barry M. Goldwater Range Integrated Natural Resources Management Plan (INRMP), Yuma, Pima and Maricopa Counties, Arizona*** (CEQ #030079. #D-UAF-K11109-AZ). EPA's review is conducted pursuant to the National Environmental Policy Act, the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR 1500-1508), and Section 309 of the Clean Air Act. Federal lead agencies in preparing the DEIS are the Departments of the Air Force, the Navy, and the Interior. The Arizona Department of Game and Fish is a cooperating agency.

The Goldwater Range, a major military installation covering 2,709 square miles, is used by the U.S. Air Force, the U.S. Marine Corps and other aviation components of the military for training. The range comprises the largest remaining tract of Sonoran Desert in the United States. The DEIS was prepared to facilitate development of an INRMP for the conservation and rehabilitation of natural resources; sustainable multi-purpose use of its resources; and public access. In addition to No Action (Management Strategy A), the DEIS fully evaluates three action alternatives for managing the range's natural resources. Management Strategy C is the proposed action. 11.15

EPA rates the DEIS and Proposed Action as **LO - Lack of Objections**. Please refer to the attached *'Summary of Rating Definitions'* for a detailed explanation of EPA's rating system. While the DEIS addresses key environmental issues in a clear manner, we recommend adopting an additional mitigation measure to reduce adverse impacts to water resources. Page S-19 states that Management Strategy B provides the greatest degree of motorized access to the range and allows driving in designated dry washes. 1.3

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For each of the alternatives, we recommend that recreational driving in dry washes be restricted to the extent possible to ensure the protection of water quality and beneficial uses from adverse effects. Adverse effects include increased erosion and sedimentation, and the discharge of hydrocarbons (fuels, oils, greases) from recreational vehicles. EPA recommends that the Final EIS (FEIS) and Record of Decision address the feasibility of mitigation to restrict or prohibit recreational driving in dry washes. The FEIS should also address the extent to which recreational driving in dry washes is consistent with State-adopted, EPA-approved water quality standards and Section 313 of the Clean Water Act. 1.3

We appreciate the opportunity to comment on the DEIS. Please send one copy of the FEIS to this office at the letterhead address (mailcode: CMD-2) when it is released. If you have any questions concerning EPA's comments, please contact my staff reviewer for this project, David Tomsovic, at 415-972-3858 or by electronic mail at <tomsovic.david@epa.gov>.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

Attachment: 1
'Summary of Rating Definitions'

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

MAY 22 2003

In Reply Refer To:
ER03/237

BMGR INRMP
P.O. Box 67132
Phoenix, Arizona 85082-7132

Dear Sir or Madam

The Department of the Interior has reviewed the Draft Environmental Impact Statement (EIS) and the Integrated Natural Resources Management Plan (INRMP) for the Barry M. Goldwater Range (BMGR). The Department's Fish and Wildlife Service (FWS) has had close involvement in the preparation of these documents. The FWS Core Team helped direct the writing, reviewing, and collecting of information that went into the INRMP. In our view the INRMP is a well-written document and we are pleased to provide our comments as an enclosure to this letter.

Thank you for the opportunity to review the Draft EIS and the INRMP for the Barry M. Goldwater Range. I hope that our comments are useful. Please address any comments on technical matters to John Morgart, Cabeza Prieta National Wildlife Refuge, at 520-387-4989. Comments regarding National Environmental Policy Act issues should be addressed to David Dall, Regional Environmental Coordinator, at 505-248-6668 or to Ken Havran in the Office of Environmental Policy and Compliance at 202-208-7116.

Sincerely,

Mary Jane Blanchard

for Willie R. Taylor
Director
Office of Environmental Policy
and Compliance

Enclosure

cc David Dall, Regional Environmental Coordinator, Region 2

Enclosure

Specific Comments on the Draft EIS and the INRMP for the BMGR

Page 2-54, mid-page, item 5 under "The primary wildlife management responsibilities of Arizona Game and Fish Department (AGFD) on the BMGR include: Manage wildlife predators and endangered species/special status species." It should be noted that management of federally-listed endangered species is a shared responsibility with the FWS. 2.41

Page 3-4, 3rd paragraph from the top starting with "Alternative Management Strategy C..." The second to last sentence in this paragraph states: "The development of new permanent wildlife waters would be limited to up to six high-priority waters pending the outcome of a detailed review of the beneficial and adverse effects of water developments on the BMGR." This statement is not correct. Under strategy C, development of up to six high priority waters is not conditional on the outcome of the review. The Core Team agreed, and it has been represented to the public, that the military would agree to the construction of the six new waters during the first 5-year review period and that a detailed review of the efficacy of waters would occur during that same period. The intent of the military is more correctly represented on page 3-53 (Table 3-14), the fourth bullet under the proposed action column where it states: "The approach to wildlife water developments would limit new developments in the first five years of the INRMP to six high-priority waters...; concurrently, literature research and studies would be conducted..." 2.14

Page 3-6, last paragraph on the page. The last complete sentence in the paragraph states: "Additionally, the road network transportation planning initiated under the Goldwater Amendment has been completed through this EIS and INRMP..." It is more correct to say that the transportation planning has "...been largely completed..." In reality, there are sections of road on the BMGR that have apparently been missed in the current inventory; some roads may have been classified erroneously as to their level of use/importance for recreation users, and the subject of use of washes traditionally used as roads is still partially unanswered. The topic of roads open for recreation use and road closures has been one of the more intensely debated topics by the Core Team and the public, and complete agreement has not been achieved. Fortunately, a set of evaluation guidelines have been appended to the document (Appendix C) that address how additional, previously existing roads, and other traditional travel routes (which may include washes) or new roads not currently identified in the existing road inventory, will be assessed in the future in terms of inclusion or exclusion from the range transportation system. These roads (washes) need to be identified and not held in abeyance until the end of the 5-year review period. 1.37

Page 3-16 (Table 3-3), row entitled: Motorized Access and Unroaded Area Management, Resource Management Element, Strategy C (preferred alternative), sixth bullet: This bullet states: "Implement site specific planning for two bypass roads that would reroute vehicle traffic around rather than through the northwest corner of the Cabeza Prieta NWR." This is an effort to curtail unauthorized vehicles and concomitant law enforcement traffic through the northwest corner of the Wilderness Area on the refuge. As it is currently depicted on Figure 3-2 (Page 3-33): BMGR - West Road System Alternatives, under the preferred alternative these two bypass roads would be restricted to government use only. We recommend that both segments of 1.4

this road be open to the public because they complete travel loops for visitors to this portion of the BMGR without requiring extensive back-tracking at the points where connecting roads that are open to public use dead-end at the refuge boundary. It is also likely that if these two new road segments are posted as being open to legitimate visitor use, it will lessen the temptation by some of the public to take a shortcut through the wilderness area on the refuge. 1.4

Page 3-17 (Table 3-3), strategy C and D in the row entitled: Recreation Services and Use Supervision, Strategy C is the preferred alternative for Unit 2 of the BMGR, and Strategy D is the preferred alternative for Units 1, 3, 4, 5, 6, and 7 (bullet 9 under both strategy C and D). The *de facto* strategy for retaining a minimum number of law enforcement positions on the BMGR becomes the 6 listed under Strategy D, versus the 4 shown under Strategy C. 8.1

Pages 3-31 and 3-32 (Figs. 3-1 and 3-2): Future revisions of these maps should have all road references on Cabeza Prieta NWR (i.e., Needed for Public Entry, Needed for Refuge Management, Not Needed for Refuge Management, No Refuge Access) removed from the maps. These designations were provided by the FWS in an early planning exercise to delineate access needs to designated public use roads through the wilderness area on the refuge, and to delineate access points to the refuge through BMGR absolutely critical to our management mission (e.g., law enforcement, hauling water to wildlife tanks, etc.) These designations were not intended to suggest that all roads leading to the refuge boundary on BMGR and labeled as "Not Needed for Refuge Management" should be closed to the public. The FWS recognizes that some of these roads provide historic visitor access to the refuge/wilderness boundary. The FWS recommends that subject roads not interfering with the military mission, and currently labeled under the preferred alternative as restricted to government use, be considered to be open for public use. 1.8 1.26

Page 4-143, fourth sentence under the heading: "Are Wildlife Water Developments Necessary for BMGR Wildlife?" Remove the word "may" and replace with the word "will" in the sentence "Wildlife that may use open water on the range...". All listed wildlife species will use open water on the range. 2.15

THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT
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May 6, 2003

Colonel James Uken
Commander, 56th Range Management Office
7224 N 139 Drive
Luke AFB, AZ 85309

Mr. Ron Pearce
Director, Range Management Department
Marine Corps Air Station
Yuma, AZ 85369

Re: Draft Environmental Impact Statement (DEIS) for the Barry M. Goldwater Range (BMGR) Proposed Integrated Natural Resources Management Plan

Dear Colonel Uken and Mr. Pearce:

The Arizona Game and Fish Department (Department) reviewed the DEIS for the Integrated Natural Resources Management Plan (INRMP) for the BMGR. The following comments are provided for your consideration.

General Comments

The Department has received several comments from our constituents regarding the road system identified in the Proposed Action. They have pointed out roads that they believe should be left open to provide adequate access for hunting and wildlife-related recreation, identified roads that are not depicted on the maps, stated that they would like access to roads identified as "agency use only", and stated that more than just "redundant" roads would be closed under the Proposed Action. The Department agrees with some of the comments that we have received.

The Department generally supports the philosophy of the Proposed Action of closing redundant roads in localized areas. However, we are also proponents of, and strongly support, access to public land and sustainable use of resources when that access and use does not damage resources. We have also repeatedly stated that we do not believe that the majority of the roads on the BMGR are causing any significant damage to the resources. 1.4

The Department looks forward to working with the planning team to identify additional roads that may be left open under the Proposed Action to provide better access for wildlife management, hunting, and other wildlife-related recreational opportunities.

Page Specific Comments

Community Report

Page 58, 1st Column, 3rd Paragraph and Page 60, 2nd Column, 2nd Paragraph
The Department recommends replacing "...future developments would be dependent upon the findings" with "...recommendations on future developments would be based upon the findings". 2.14

Page 59, 1st Column, 1st Bullet
The Department recommends removing "and potentially allowing future motorized access to currently restricted areas". This is common to all alternatives; therefore, we do not believe that it should be stressed only under Alternative B. 1.38

Page 59, 2nd Column, 3rd Paragraph
The Department recommends removing the sentence "On these terms, Strategy B may be less beneficial than the proposed action". We do not support the statement and in fact believe that the approach to wildlife water developments prescribed under Alternative B may be one of the most beneficial to wildlife. 2.17

Page 87, 2nd Column, 2nd Paragraph
Alternatives A and B do have positive controls on the proliferation of wildcat roads. Under both alternatives it would be illegal to drive off-road. We also do not believe that the selection of either Alternative A or B would lead to "long-term adverse ecosystem effects". 1.39

DEIS

Page 3-4, 4th Paragraph
The sentence that starts with "The development of new permanent wildlife waters..." should be clarified. The development of up to six wildlife waters in the first five years would not be dependent (pending) upon the outcome of a detailed review. This sentence needs to be clarified and made consistent with the wording in Table 3-3, which states that up to six wildlife waters will be constructed during the first five years. After that time, the decision for constructing future developments will be based upon recommendations from a panel of experts. 2.14

Page 3-31, 2nd Paragraph
The Department recommends that the sentence starting with "Washes are currently a part of..." be removed or clarified. We provided this comment previously on the screen draft version of the document. We believe that it should be clear that washes themselves can be designated in the road system. 1.36

Thank you for the opportunity to review and comment on this DEIS. If you have any questions regarding our comments or to schedule the next planning team meeting, please contact Russ Engel at 928-342-0091.

Sincerely,

Duane L. Shroufe
Director

DLS:rke

cc: John Kennedy, Habitat Branch Chief
Larry Voyles, Regional Supervisor, Region IV
Russ Engel, Habitat Program Manager, Region IV
Dale Hall, Regional Director, U.S. Fish and Wildlife Service, Region 2
Lori Faeth, Policy Advisor for Natural Resources, AZ Governor's Office

"Managing and conserving natural, cultural, and recreational resources"

Arizona State Parks

May 22, 2003

Stephanie Dawley, Captain, USAF
Department of the Air Force
Chief of Environmental Science Management
56th Range Management Office
7224 North 139th Drive
Luke AFB AZ 85309-1420

ATTN: Adrianne Rankin, Archaeologist

Re: Draft EIS for the Integrated Natural Resources Management Plan (INRMP); DOD-LAFB; SHPO-2003-0545(15216)

Dear Captain Dawley:

Janet Napolitano
Governor

State Parks Board Members

Chair
Suzanne Pfister
Phoenix

Gabriel Beechum
Casa Grande

John U. Hays
Yarnell

Elizabeth Stewart
Tempe

William C. Porter
Kingman

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State Land Commissioner

Kenneth E. Travous
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Arizona State Parks
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(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

Thank you for providing us with the above draft document for our review. The Agency needs to initiate Section 106 consultation with our office for this undertaking. If the Agency wishes this NEPA analysis and documentation to be used for your consultation under the National Historic Preservation Act (NHPA), as allowed in 36 CFR Part 800.8, we need to be notified in writing of this intent. Until we receive that letter, our comments provided below are as an interested party to the NEPA consultation and do not constitute consultation with the Agency under Section 106.

1) The Advisory Council on Historic Preservation's regulations implementing Section 106 of the NHPA at 36 CFR Part 800.8(c)(1)(iii) state that the Agency shall consult with the SHPO, tribes and other interested parties ***during*** NEPA scoping, analysis, and the preparation of NEPA documents – we do not have any indication that this has happened for the DEIS. Thus, it appears that the Agency has not met the standards stipulated at 800.8(c)(1) for developing environmental documents to comply with Section 106. These stipulations are clear as to the steps that the Agency shall undertake during the preparation of a draft EIS.

2) An INRMP includes an Integrated Cultural Resources Management Plan (ICRMP). In fact, this INRMP refers to an ICRMP throughout the document. Where is the ICRMP? We do not have any record of the Agency consulting with this office on a draft ICRMP – has a draft been generated yet? SHPO requests that we review and comment on the draft ICRMP when it is available. 14.2

3) Has the Agency coordinated and consulted with the relevant Tribes about the content and intent of the ICRMP? The document states that two letters were sent to the tribes asking for their input and they were invited to two public meetings. Was there any attempt to follow up with tribes through individual meetings with their cultural resources staff or relevant cultural contacts? Were there follow-up telephone calls? We are unsure if the level of tribal

consultation constitutes a good faith effort for meaningful consultation. Perhaps access to the tribes should be coordinated by one of your staff that has expertise working with tribes on issues of archaeology, sacred sites, and Traditional Cultural Places (TCPs)? Please clarify the level of effort spent on tribal consultation for the ICRMP and provide SHPO with the tribal comments. 14.2

4) We note that 17 conservation elements are described with various levels of conservation/protection suggested. Only Option D offers the best protection for cultural resources and tribal trust resources, yet it does not go far enough to protect cultural resources. Issues such as closing particularly sensitive areas to 14.1

vehicular traffic and/or public access should be considered, especially in those areas where heritage resources are being repeatedly vandalized. The 17 conservation elements also need to analyze effects that each strategy would have on cultural resources. 14.1

5) What is the plan to protect cultural resources? There does not seem to be a plan per se, just the recommendation to hire rangers. What about law enforcement officers that have Archaeological Resources Protection Act training? Such training would give the rangers the authority to arrest pothunters and vandals, thus presenting (hopefully) a substantial deterrent to such activities in the future. 8.4

5) With regard to roads, all roads should be surveyed prior to allowing recreation, and prior to making decisions as to which ones should be left open and which should be closed. The Agency should be aware that existing roads may go through sites (and be impacting them through use or road maintenance activities), or may be located near sites, bringing potentially adverse visitation to sites that can result in indirect or secondary impacts. Roads should be a high priority for survey, possibly even considering limiting their use (and especially destructive road maintenance activities like blading and grading) until the surveys are completed. 1.40

6) With regard to rock hounding, it should be noted that many places where rocks are collected are archaeological sites. Also, some tribes consider rocks and minerals to have sacred value. It is our recommendation that rock hounding should not be allowed in order to protect archaeological sites and tribal trust resources. 4.2

7) With regard to parking off the roads, this should be considered on a case-by-case basis and be based upon the knowledge gained through cultural resource surveys of the roads. The strategy for off road parking should be based upon the empirical evidence gained through the surveys as to where sensitive heritage resources are located that should be avoided. 3.2

8) With regard to water development activities, tribes in Arizona have often indicated that springs, tanks, tinajas, and washes are sacred places. Any development of these natural water features (e.g., for wildlife guzzlers, etc.) should be sensitive to tribal concerns and should be precluded by an archaeological survey and consultation with the Native Americans. As with other developments specified for the Range, Section 106 consultation with this office, the tribes, and other interested parties should be conducted prior to the implementation of water development projects. In addition, it is known that archaeological and sacred sites on the Range have already been affected by old water developments – the ICRMP needs to include discussion of, and plans for, mitigation of these past disturbances (i.e., at Tinajas Altas). 2.24

9) With regard to recreational shooting, the potential impact of this activity to archaeological sites, especially rock art sites, needs to be examined and discussed. There may be areas on the Range where this type of activity should not be allowed as it has a high potential to damage archaeological sites. Again, Section 106 consultation needs to occur when recreational shooting activities are being considered. 6.1

10) With regard to the proposed continuance of dispersed camping, it would be wise to conduct archaeological surveys of the traditionally used campsites, if this has not already occurred. It might be a good protective measure if the Agency developed camping areas within which people could camp – an archaeologist would help to guide the best placement (i.e., the least sensitive with regard to cultural resource impacts) of the campground based upon the results of their surveys. Again, Section 106 consultation needs to be completed for camping areas. 3.2

11) There should also be some discussion of the Agency's plans for meeting future responsibilities under Section 110. This is especially critical in the areas being posed for recreational use.

12) We strongly encourage the Agency to continue consulting with our office and the tribes as this DEIS continues to evolve. In summary, we believe that much more analysis of existing, continuing, and potential (future) impacts to cultural resources on the Range can be, and should be, addressed within this INRMP. In addition, it is critical that an ICRMP be generated and submitted for review and comment by this office and the tribes. 14.2

We look forward to reviewing a revised DEIS and a draft ICRMP. We appreciate your continued cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions or concerns, please feel free to contact me at 602/542-7138, or e-mail me at ahoward@pr.state.az.us.

Sincerely,

Ann V. Howard

Ann Valdo Howard
Public Archaeology Programs Manager/Archaeologist
State Historic Preservation Office

Maricopa County

Parks and Recreation Department

411 N. Central Avenue
Suite 470
Phoenix, Arizona 85004
Phone: (602) 506-2930
Fax: (602) 506-4692
www.maricopa.gov/parks

March 28, 2003

James R. Uken, Colonel, USAF
BMGR INRMP
P.O. Box 67132
Phoenix, AZ 85082-7132

RE: Draft Environmental Impact Statement (DEIS) for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

Dear Colonel Uken:

Thank you for the opportunity to review the comprehensive DEIS. We would greatly appreciate it if the document would include the Buckeye Hills Recreation Area (BHRA), a park within Maricopa County Parks and Recreation Department. We respectfully recommend including BHRA in Figure 4-20 Recreation and Protected Management Areas in the BMGR Region, and on section 4.12.1.5 Outdoor Recreation in the BMGR Vicinity. Please feel free to include BHRA in other figures, sections, or tables where appropriate. For your use, more information regarding Buckeye Hills Recreation Area follows.

BHRA is located 5 five miles southwest of the Town of Buckeye, on State Route 85. The park entrance is approximately at milepost 142.6. The Buckeye Hills Recreation Area consists of 4,474 acres of rolling bench above the south bank of the Gila River. Many years ago the Gila River formed the southern boundary of the United States. In 1853, the Gadsen Purchase obtained the southern parts of Arizona and New Mexico. The total area acquired was 45,535 square miles and was purchased at a cost of $10 million. The area was considered a suitable route for a railroad across the Southwest. 5.2

Facilities at the recreation area include 50 picnic tables, cooking grills, two large ramadas, and a small shooting range at the southern end of the area. There is no water available in the recreation area; however, a recently drilled well has located water and water system construction documents include water lines, electrical conduits, and a 100,000 - gallon water storage tank for future park development. Interest has increased recently to explore investing to expand and upgrade the shooting range at BHRA. Residential development near existing shooting ranges in the west valley have closed or are threatening to close ranges currently being used heavily by local police departments. Buckeye Hills Recreation Area is being considered for a shooting range development because encroachment is unlikely in the foreseeable future.

Please call if you have any questions regarding Buckeye Hills Recreation Area.

Sincerely,

Roxana Rojo

Roxana Rojo, Project Manager and Article 5 Procurement Officer

Certificate of Clerk

Board of Supervisors of Pima County, Arizona

State of Arizona
County of Pima ss

I, Lori Godoshian, do hereby certify that I am the duly appointed, and qualified, Clerk of the Board of Supervisors of Pima County, Arizona.

I further certify that the attached resolution entitled

RESOLUTION NO. 2003-77

A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS
TO SUPPORT IMPROVED MANAGEMENT OF THE GOLDWATER RANGE.

(See attached copy)

is a true and correct copy of a resolution passed and adopted by the Board of Supervisors of Pima County, Arizona, at a meeting held on the 22nd *day of* April, 2003, *at which a quorum was present, and that the original resolution is officially of record in my possession.*

In Witness Whereof, *I have hereunto set my hand and affixed the seal of the Board of Supervisors of Pima County, Arizona, this* 23rd *day of* April, 2003.

Lori Godoshian
Clerk

RESOLUTION NO. 2003- 77

A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS TO SUPPORT IMPROVED MANAGEMENT OF THE GOLDWATER RANGE

WHEREAS military pilot training is a major, long-standing industry in Pima County and the State of Arizona, and of crucial importance to our national security and world peace; and

WHEREAS the Goldwater Range, an installation in western Pima County indispensable for military pilot training, and other bases in Arizona are accountable to Congressional and Defense Department reviews and renewals depending upon their efficiency, necessity, economy, and performance; and

WHEREAS the Goldwater Range currently is writing a management plan (Integrated Natural Resources Management Plan) that will govern public activities and protection of natural and cultural resources on the range for the next 25 years; and

WHEREAS the Goldwater Range is the largest single block of relatively pristine Sonoran Desert in Arizona; and

WHEREAS wildlife benefits from larger roadless areas; and

WHEREAS low-impact public visitation limited to certain designated roads serves both to protect this special land and its wildlife, and to uphold the military mission; and

WHEREAS, a Goldwater Range plan that assures ecological integrity through natural processes, that protects wildlife, native vegetation, and cultural resources, and that minimizes the effects of public visitors and assures their safety, will best enable the military mission and be kindest to the environment; and

WHEREAS the draft management plan ranks Alternative "D" as the most beneficial option for earth resources, water resources, special areas, cultural resources, visual resources, noise, wildfire management, and public health and safety; and

WHEREAS on numerous occasions throughout its proud history the Pima County Board of Supervisors has endorsed, directed, and worked for management plans which encourage and assure protection or sustainable use of our natural wonders, including conservation plans for our Sonoran Desert; and

WHEREAS protection and careful management of the Goldwater Range will be in the best public interest and for the benefit of present and future generations of Pima County; and

NOW THEREFORE BE IT RESOLVED that the Board of Supervisors of Pima County supports the Goldwater Range management alternative that best protects natural and cultural resources, that best provides for the safety of public visitors, and that best ensures the military mission, as set forth in Alternative "D" in the plan. 11.3

BE IT FURTHER RESOLVED the Pima County Board of Supervisors requests that the Congress of the United States of America provide the fullest funding and support for Goldwater Range management, staffing, monitoring, enforcement, and reclamation, consistent with the needs for military training.

PASSED AND ADOPTED on this 22nd day of April, 2003

PIMA COUNTY

Chair of the Board of Supervisors

APR 2 2 2003

ATTEST:

Clerk of the Board

APR 2 2 2003

APPROVED AS TO FORM

Deputy County Attorney

OFFICE OF THE
BOARD OF SUPERVISORS
198 Main Street
Yuma, Arizona 85364

HAROLD ALDRICH
INTERIM COUNTY ADMINISTRATOR

LENORE LOROÑA STUART
DISTRICT 1
LUCY SHIPP
DISTRICT 2
CASEY PROCHASKA
DISTRICT 3
MARCO A. (TONY) REYES
DISTRICT 4
ROBERT J. (BOB) MCLENDON
DISTRICT 5

April 23, 2003

BARRY M. GOLDWATER RANGE
INTEGRATED NATURAL RESOURCE
MANAGEMENT PLAN
P.O. BOX 67132
PHOENIX, ARIZONA 85082-7132

Dear Colonel James Uken and Mr. Ron Pearce:

RE: DRAFT EIS/INRMP - YUMA COUNTY RESOLUTION NO. 03-23

The Yuma County Board of Supervisors unanimously adopted Resolution No. 03-23 on April 21, 2003 in support of an Integrated Natural Resource Plan (INRMP) that maintains the current levels of public access for lands within the Barry M. Goldwater Range. 11.4

A copy of Resolution No. 03-23 is enclosed and should be consider as Yuma County's official submission for the public comment phase of the draft INRMP.

Sincerely,

HAROLD ALDRICH
Interim County Administrator

HA/ss

enclosure

c Tom Manfredi, MCAS Community Planning
Jon Fugate, Yuma Valley Rod & Gun Club
Harold Aldrich, Director, Development Services

P:\Followup\Corresp\2003\04-21R#7c.wpd

Tele: (928) 329-2104 Fax: (928) 329-2001 TTD: (928) 329-2104
Website: www.co.yuma.az.us

YUMA COUNTY
BOARD OF SUPERVISORS
RESOLUTION NO. 03-23

IN SUPPORT OF AN INTEGRATED NATURAL RESOURCE PLAN THAT MAINTAINS THE CURRENT LEVELS OF PUBLIC ACCESS FOR LANDS WITHIN THE BARRY M. GOLDWATER RANGE

RE: Draft EIS/INRMP

WHEREAS: The Yuma County Board of Supervisors has actively supported the withdrawal of 1.7 million acres of the Barry M. Goldwater Range (BMGR) for continued use by the Department of Defense; and

WHEREAS: We continue our strong support of the Department of Defense military training missions on the BMGR; and

WHEREAS: We are pleased with the formation of the BMGR Executive Committee (BEC) and support its continued role in cooperative management decisions; and

WHEREAS: We also support the multi-use of these lands for wildlife management and the enjoyment of the public; and

WHEREAS: We understand that the State of Arizona (through the Arizona Game and Fish Department) has responsibility for the management of wildlife on the BMGR; and

WHEREAS: We support the Arizona Game and Fish Department's continuing efforts of conservation, protection and management of wildlife and wildlife-dependent outdoor recreation on the BMGR; and

WHEREAS: We support an Environmental Impact Statement and Integrated Natural Resource Management Plan that will promote access for wildlife conservation and wildlife-based public recreation, with due regard for safety and/or security concerns.

NOW, THEREFORE, BE IT RESOLVED that the Yuma County Board of Supervisors is in support of the concept of Alternative A or B for the management of public access, recreation activities, hunting and wildlife management, in that either of these alternatives would continue the multi-use ecosystem management that has proven successful. 11.4

Adopted this 21st day of April, 2003.

LENORE LORONA STUART, Chairman

ATTEST:

SUE STALLWORTH
Interim Clerk of the Board

P:\Resolutions\2003\03-23.wpd

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

Your comments on this Draft Environmental Impact Statement (EIS) for the Barry M. Goldwater Range Integrated Natural Resources Management Plan (INRMP) are requested. Letters or other written or oral comments provided may be published in the Final EIS. As required by law, comments will be addressed in the Final EIS and made available to the public. Any personal information provided will be used only to identify your desire to make a statement (written or verbal) during the public comment portion of any public meetings or hearings or to fulfill requests for copies of EIS associated documents. Private addresses will be compiled to develop a mailing list for those requesting such information. However, only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

You can use this form to provide written comments regarding the Draft EIS. If you would like to use this form, please leave it in the comment box tonight or fold, tape, and mail this form. Any written comments must be received by **May 7, 2003** to receive full consideration in the Final EIS.

The Draft EIS and a Community Report summarizing the Draft EIS is available on the Internet at www.luke.af.mil (click on public site, then Barry M. Goldwater Range Complex, Environmental Issues, Download Documents). The Draft EIS is also available at 17 libraries. For additional information, contact Capt. Stephanie Dawley (623-856-3823, ext. 231) or Mr. Ron Pearce (928-269-3401).

To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: David A. Evertsen
Town Manager, Town of Gila Bend
PO Box A, GB, AZ, 85337
Devertsen@Gilabendaz.org
928-683-2255

COMMENTS

Very comprehensive, very good! I was very surprised that so much effort for public input was sought, and incorporated in the document! It is very voluminous, but comprehensive and quite interesting.

Thank you for your efforts in integrating the hundreds of facts, and multiple-interests of public and public agencies.

Keep up the great work! — D.

Suggestions: ① Greater restriction is better, in that you could always increase access for public use later, or public access with conditional use. 1.34

② Prohibit construction of new public access roads. 1.35

③ Restore closed or unused roads.

④ Keep public access as practical as possible while enhancing "Environs".

AHAMAKAV CULTURAL SOCIETY

Fort Mojave Indian Tribe

P.O. 5990 MOHAVE VALLEY, AZ 86440 (928)768-4475

March 19, 2003

Colonel James, R. Uken
USAF Barry M. Goldwater Range
BMGR INRMP
P.O. Box 67132
Phoenix, AZ 85082-7132

RE: BMGR Draft Environmental Impact Statement Integrated Natural Resource Management Plan

Dear Colonwl Uken:

The AhaMakav Cultural Society, which is the Historic and Cultural Preservation Office of the Fort Mojave Tribe, has received and reviewed the subject document, and we find that our concerns have been adequately addressed.

If you have any questions, call us at (928)-768-4475.

Sincerely,

Chad Smith

Chad Smith, Tribal Archeologist,
Cultural Resource Manager

xc: Elda Butler, Director, AhaMakav Cultural Society
Nora McDowell, Tribal Chairperson

Yavapai-Apache Nation

Phone: (520) 567-3649 Fax: (520) 567- 3994

James R. Uken, Colonel, USAF
Director, 56th RMO
7224 North 139th Drive
Phoenix, AZ 85309-1420

March 3rd 2003

RE: Tribal Trips and Cultural Resources/Comments for INRMP

Dear Colonel,

First I would like to thank-you for the cooperation and hospitality provided to us by the Air Force and second to commend the efforts and dedication of your project archaeologist, Adrianne Rankin on our behalf. On the third and most recent of our field trips (February 24-26) we were privileged to see some of our ancestral (Yuman speaking) sites in the deep desert. These sites are fragile and their locations are defined by and dependent on that most precious of the deserts resources, water. As the land steward you are keenly aware of how fragile the ecology of the project area is and how the slightest alteration can manifest itself as a significant negative impact down the road. Your mission of course is to mitigate, to the extent possible, those effects caused by the greater tactical mission of the Air Force and to that end your team has made a difficult job a success. Our immediate concern is the impacts caused to the natural and cultural resources by the public. From the uninformed traveler to the four-wheel driver and from the geocache enthusiast to the pot hunter. 14.1

It is our understanding that despite a policy of precluding geocache players from military reserves there is an ongoing game point at Tinajas Altas. We are not sure of their impact, but people prying around a sensitive arch site looking for a hidden object cannot have a positive outcome. 5.7 14.1

Last Tuesday around 10:00 a.m. we encountered a lone man in full camouflage several miles from highway 85 claiming to be a permitted predator hunter. Meaning, we assumed, permitted to kill coyotes and mountain lions. Both animals were very important to our traditional culture, remain so today and deserve more respect than to be eradicated from what is their home. It is our understanding that predator and prey species exist in a delicate balance on the landscape. It is fundamental biological law that you cannot have an excess of predators unless there are prey species in excess as well and we know of no eradication policy for these latter animals. Is some bureaucrat unilaterally determining, which animals are good for the desert and which are not? 2.36

2400 W. Datsi Street, Camp Verde, AZ 86322

In addition we were curious to see numerous (we counted 8) plastic water and beverage containers scattered over an acre-sized area at the granite tanks. One of the most pleasant aspects of the desert is that it is clean and one of the negative aspects of open public access is that of litter left by uncaring citizens. The half-life of these modern materials in the low desert is counted in the centuries. The cumulative effect of this kind of behavior on the animals and plants around water sources in the project area is exponentially greater than other places where people choose to dump their garbage. We are reticent to advocate a total closure of the Range to the public, because it is probably a case of the few wrecking the arrangement for the many. However something further needs to be done to insure the continued protection of archaeological sites and water sources on the Range. I would like to thank-you for your concern regarding these matters and we look forward to a continued relationship with your office. 2.25 7.2 14.1

Cordially,

Katherine Marquez

Katherine Marquez
Director, Yavapai Cultural preservation

CC:AR/JM/FS/SW/DK

Yavapai Cultural Preservation

Yavapai-Apache Nation
2400 W. Datsi St.
Camp Verde, AZ 86322

Ñyahv'gah biyah

Telephone: (928) 567-7009 Fax: (928) 567-7068 E:mail: kmarquez@yan-tribe.org

James R. Uken, Colonel, USAF
Director, 56th RMO
7224 North 129th Drive
Phoenix, AZ 85309-1420

RE: Sauceda Pothole/Comments To INRMP

Dear Colonel,

On our most recent field trip to the project we visited the archaeological site(s) associated with Sauceda Pothole. We were fortunate to arrive there in a light rain, which made the desert all the more beautiful and reinforced the importance of natural process in the project area.

We were saddened to see the hodgepodge obruction built above the pour over it. It is obvious from simple observation the structure is not only poorly conceived, but also ineffestive. As is so often the case this feature not only blights the landscape, but defeats the purpose of its construction, which was presumably to help wildlife. Instead it acts as a death trap for small animals, which are unable to negotiate the steep sides after entering. Leaving them to a slow death as the seasonally available water evaporates.

2.20

If this "dam" was to pool water for large mammals our question is this, what did these animals do prior to is its construction for water? If certain populations of animals are at rick because of severe conditions we are not opposed to helping them over the hump when a crisis arises. However building an unsightly wall at this location serves no proposes other than to disrupt the local ecology and deface the view. It is in fact a desecration to the desert. Not becauce it is man-made, but because it severes no propose. We would like to suggest that it be removed entirely so what little water makes is into this place can flow unabated as was intended.

Cordially,

Katherine Marquez

Katherine Marquez
Director Yavapai Cultural Preservation

CC:AR/FS/JM

Friday, April 25, 2003.max

YAVAPAI

PRESCOTT ◆ INDIAN ◆ TRIBE

March 4, 2003

James R. Uken, Colonel, USAF
Director, 56th Range Management Office
BMGR INRMP
P.O. Box 67132
Phoenix, AZ 85082-7132

RE: Draft Environmental Impact Statement (DEIS) for the Barry M. Goldwater Range Proposed Integrated Natural Resources Management Plan

Dear Colonel Uken:

We have reviewed the above named report and wish to compliment the Departments of the Air Force, Navy and Interior for an excellent job with such a tremendous undertaking. In 1999 the Yavapai-Prescott Indian Tribe was awarded a contract to provide a summary of the Yavapai traditional use of the land that is now known as the Barry M. Goldwater Range.

On September 14, 1999, Tribal representatives of the Yavapai-Prescott Indian Tribe accompanied Simon Bruder, Principle Investigator/Dames & Moore; Matthew Hill, Field Investigator/Dames & Moore; and Adrianne Rankin, Senior Cultural Resource Specialist/ USAF on a tour of the Tinajas Altas area to document Yavapai utilization of trade corridors with groups further south.

530 E. MERRITT PRESCOTT, AZ 86301-2038 Phone 928-445-8790 FAX 928-778-9445

The Sections 4.16.1.2 Cultural History is especially well done with a good overview of the groups claiming cultural affiliation with the BMGR. The research adding to the knowledge base regarding the Patayan cultural tradition will be used to guide further documentation of the prehistoric Yuman speaking tribes.

Sincerely,

Ernest Jones, Sr.
President

EJS:lj:0503

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS *THE ZIMMERMANS*

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

Concerning the: **"Proposed Integrated Natural Resources Management Plan [INRMP], Barry M. Goldwater Range Community Report" February 2003.** ***(Comments Due May 7, 2003)***

The proposal to seal off many public access roads on the Barry M. Goldwater Range not only stands in direct defiance of the Sikes Act, but also serves notice to the community of Ajo, Arizona that its tenuous economic stability is one step closer to ruin. 1.4 1.23 1.25

Ajo, Why and Lukeville, Arizona will be devastated economically if the Record of Decision (ROD) adopts and implements the present INRMP recommended changes to public access and non-consumptive uses of the surrounding desert!

I strongly oppose the Management Strategy recommended in the INRMP. A Record of Decision must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process, therefore, an economic impact statement must be mandated and reviewed prior to the final ROD! 10.1 10.3

For reasons enumerated in this document and the following attachments, I implore you to thoroughly investigate the mishandling and/or omission of data contained in the INRMP proposal. 1.17 **The illegal enforcement of certain road closures on the BMGR over the past several months (see attached) must also be investigated.** 1.16 **It is imperative that a fair, honest and unbiased study be mandated 'before' any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why and Lukeville, AZ (to mention but a few) from public access to the desert that surrounds them.** 11.28 **I strongly recommend that the tenets of Alternative Management Strategy "A" contained in the INRMP (no action) should remain in effect until such time as the above mentioned study can be completed and fully considered.** 1.5 11.10

Sincerely,

Rosalie K. Zimmerman

Rosalie K. Zimmerman
Concerned Citizen
Ajo, Arizona

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS *THE ZIMMERMANS*

241 W. 4th Av. Ajo, Arizona 85321

Concerning the: Proposed Integrated Natural Resources Management Plan for the Barry M. Goldwater Range

AJO ARIZONA: BACKGROUND COMMENTS

The northernmost reaches of the beautiful Sonoran desert extend to the back door of the small community Ajo, Arizona. Since the closure of the Phelps Dodge New Cornelia mine in 1984, the desert has become the vital link in sustaining the economic lifeblood of the area. The desert is the remaining singular attraction for the winter visitors and tourists whose economic contributions maintain the few remaining businesses. If not for the winter visitors and tourists, most Ajo business would simply collapse. The few remaining residents, including dozens of federal employees and their families would then need to travel over 100 miles one way to get to a supermarket or restaurant. The attractiveness of the desert is essentially all that holds the fabric of this community together. 10.2

High powered attorneys hired by environmental groups, including groups funded by federal dollars, have been successful in finding methodologies to systematically seal off or otherwise restrict access to vast areas of the desert. These closures, thinly veiled under the guise of "endangered species" or "cultural resource preservation" are decimating the economic resources of an already impoverished community. This is a community unable to counteract the legalese of the high priced specialists because the community is simply incapable of garnering enough resources to hire its own cadre of attorneys in order to wage a counter offensive against the tendrils of environmental activism. 10.3

This is a "pro-environment" community. A community that enjoys the desert. A community that would like to see good, objective legislation to clean up and protect the desert. But instead of a healthful "pro-environment" program to preserve the desert, Ajo is about to fall victim to yet another of the many whims of environmental activists with their fixation on establishing a wilderness area from the California border to Tucson through any possible means. The Proposed Integrated Natural Resources Management Plan (INRMP) goes so far as to suggest measures by which this action may ultimately be attained. The INRMP is less than enthusiastic about the Sikes Act mandates and chooses rather to hide behind a very subjective interpretation of the Military Lands Withdrawal Act (MLWA) of 1999. The Sikes Act is clear about facilitating public access, while the MLWA is less clear, stating only "that the range would be used first and foremost for specific national defense purposes. Management of natural resources and public access within the Barry M. Goldwater Range (BMGR) must be consistent with these specified national defense purposes" (INRMP-Community Report Pg 4). 11.19

The INMRP "proposed Management Strategy" will go so far as to make any school child that picks up a pebble a criminal! The "proposed action" seeks to sever the community of Ajo from some of the best access roads it has to the BMGR-East. Many currently popular desert tours through BMGR-East, will simply be eradicated, along with a large portion of the only truly resilient commodity of the area, desert tourism. The soft flame of a fragile desert community's economy continues to become nothing more than a dying ember. 4.1 1.33 10.2

COMMENTS ON THE: Proposed Integrated Natural Resources Management Plan, Barry M. Goldwater Range Community Report - February 2003

Comment A:

Blatant illegal closure of roads to public access are already in effect!

For several months, BLM, in cooperation with Cabeza Prieta administration and the designers of the Barry M. Goldwater Range – Air Force, Sauceda Mountains Recreational Use Area (Area B) "Visitor Use Map" Map Version 1.0 – July 2002 have illegally enforced the closure of public access roads in Area "B" (Xerox copy attached).

I was informed by a federal employee, that one possible outcome of the INRMP would be the determination to close certain roads on the BMGR after a Record of Decision (ROD). Any enforced closure 'before' a ROD is made would be illegal! The BMGR area "B" map states that driving off 'any' of the roads "shown on the map" is illegal. However, the map depicts and describes several active roads as being for "FOOT TRAVEL ONLY." When permits are issued at Cabeza Prieta, administrative personnel state that driving on roads designated for "FOOT TRAVEL ONLY" is illegal. This misinformation prompts illegal road closures that have been supported by BLM management. 1.16

BLM has also been active in posting signs and otherwise closing roads long in existence. Decades long residents of Ajo described at a INRMP public meeting on 04/04/03 in Ajo, that BLM has closed some roads that have been in use on the range for decades. BLM argued that these roads were created by Border Patrol. These Ajo residents weren't impressed by these overt "misstatements" by BLM.

Road map omissions and inaccuracies included in the INRMP, hint at a certain type of activism and should have no place in the document. Ajo residents stated in informal discussions at the 04/04/03 meeting, that it appeared the INRMP maps were designed with intentional omissions in area "B". It seems obvious that by leaving out certain roads, INRMP designers could assure that only the roads included in the proposed INRMP would be approved in the ROD process as either foot trails, access roads or closed roadbeds to be revegetated. All roads that are either purposefully or accidentally left out of the study would then simply be closed after the final ROD, as if they had never existed.

This is a blatant injustice to those who must undertake the responsibility of making the final decisions. Certainly it is grossly unfair to the visitors who have for many years taken family and friends from around the country, as well as visitors from around the world, to favorite scenic areas, picnic areas or trail heads that (because of omissions) would simply be closed. These roads should not have been omitted and should be included in the INRMP map. 1.17

As an attachment, I have provided a map and GPS tracking record of 'some' BMGR-East area "B" roads. The Ajo resident who provided the map explained that some of the roads were not "tracked" because of the "illegal" closures as mentioned above and only recently discovered that access to these roads was in fact 'legal'. The resident notes that several long existing roads were in fact, GPS "tracked" that do not appear on the map included in the INRMP.

Comment B:
Example of the 'omissions' domino effect (close 1 mile, 5 miles to get around it):

Of particular concern to Ajo residents is the proposed curtailment of access to the area "B" SW line road via Childs gate area (SW corner area "B"). Access to this route would be extinguished with the loss of access to the "line road" from Childs gate. This route continues eastward past the line road and on to Bata Mote Mountain, then heads south along the east length of Bata Mote Mountain to Pipeline road, ending in Ajo. No highway miles nor locked gates are involved. A very pleasant morning or afternoon trip for visitors.

A less used access point (to this same route) is via the old water wagon road from Gila Bend to Ajo. This access is via the Ajo Firing Range, up over Bluebird Pass and then on to the range. However the road is strewn with large rocks and proves to be so rough as to prevent many from considering it a viable access road to BMGR. 1.23

Topographical maps show an old road adjacent to the line road, but it has not been used since the construction of the line road. If the line road were to be closed, the older road adjacent to the line road should be reopened in order to allow visitors to enter at Childs gate, then proceed eastward around Bata Mote Mountain.

The line road should remain open, or, the old road adjacent to the line road should be reopened. Many would prefer to see the old road reopened, as it is much more scenic than the gouged out line road. If, however, both roads are closed, visitors entering at Child's Gate will be forced to extend their trip on the range by 5 miles in order to negotiate an alternate route around the line road closure.

Comment C:
Failure to suggest a *good* management strategy that provides for enhanced public access.

The INRMP Community Report (pg 4) includes a few specifics from the Sikes Act, namely: "The Sikes Act specifies that: Consistent with the use of military installations to ensure the preparedness of the Armed Forces, the Secretaries of the military departments shall carry out [the aforementioned program] to provide for---

(A) the conservation and rehabilitation of natural resources on military installations;
(B) the sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping and non-consumptive uses; and 1.15
(C) subject to safety requirements and military security, public access to [the BMGR] to facilitate the use."

Aside from the inclusion of this "pro use" statement, the INRMP Community Report is otherwise blatantly biased. A thread of partiality, subjective analysis, and environmental activism is carefully woven throughout the entire document. On nearly every page, the text brandishes its prejudice by focusing on every imaginable reason why the mandates of the Sikes Act should be subjugated to a lame interpretation of the MLWA of 1999.

On the MLWA, the INRMP records, "Congress previously determined, through the MLWA of 1999, that this range [BMGR] would be used first and foremost for specific national defense purposes. Management of natural resources and public access within the BMGR must be consistent with these specified national defense purposes."

The next statement in the INRMP (pg 4) goes on to reflect its bias and the overt subterfuge embarked upon by biodiversity activists who have in turn recruited cultural preservation activists as well, in order to attain their misguided goal. "This national defense mandate for the BMGR, however, does not preclude implementing a management plan that provides for effective conservation protection, and rehabilitation of natural resources; protection of cultural resources; and sustainable public use." This verbiage subjugates the intent of the Sikes Act by contending that the national defense mandate does not "preclude" implementing a different management plan. In other words, the tenets of the Sikes Act are an impasse to the environmental activist agenda and must be ignored. The INRMP (pg 7) attempts to 'explain away' the contrived 'oversight' by forgiving itself for what it must now do. "The provision to manage both natural and cultural resources in the INRMP is an approach that is not fully incorporated within Sikes Act guidance." With this, the INRMP gives itself license to create something new.

It is evident that the authors of the INRMP simply do not wish to address the possibility of actually increasing public access and non-consumptive usage. They would rather oust the tenets of the Sikes Act in order to implement an "alternate" management plan that focuses on issues to the exclusion of the Sikes Act, even down to banning rockhounding by school children. 1.15

Nowhere in the INRMP does the author hint at the possibility of a good management strategy, one which would increase public access while at the same time protect and conserve the natural and cultural resources of the BMGR. The INRMP would lead us to believe that no such plan is possible. The INRMP presents management strategy "B" as a plan to increase public access. The transparent tactic here lies in the fact that preparers of the INRMP know that Alternative Management Strategy A will receive a "nay" vote simply because it carries the "No-Action Alternative" label. The increased public usage tenets of Alternative Management Strategy B will also receive a "nay" vote because the plan is outlined throughout the INRMP in such a way that the reader gets the idea that Strategy B would allow everyone to run rampant throughout the BMGR trashing the entire range. Carefully worded, the INRMP (pg 68) states, "As compared to the proposed action and the existing conditions, the aggregate effect of Management Strategy B on the recreational setting potentially may be negative. Expanded vehicular use opportunities could increase the physical evidence of vehicle traffic on the range environment and diminish primitive character."

A rational public access strategy is simply missing! Nowhere does the INRMP provide that increased public access, along with an enhanced system of controls and education, could positively impact visitor perception and understanding of the critical balances inherent in ecology, to include desert ecological systems. The net benefit of a properly constructed management strategy would not only provide support to conservation efforts, but would serve to raise public awareness of individual responsibility necessary to maintain biological and cultural resources. This approach would necessitate that environmental care takers start educating people with common sense objectivism, instead of the traditional half truths.

That they make people aware of the need to be careful! Penalize people who are not! For example, the BLM approach is to plant dozens of signs throughout the desert (to its desecration) to inform people that they should stay on the road. BLM should instead place signs at desert 'access points' (not in the wilderness) which outline how many hundreds of dollars the fine will be if they are caught traveling cross country (unless of course, health and welfare necessitates). People want to enjoy the range! They will protect the range if they understand the advantages of doing so, as well as the disadvantages for not doing so. 1.13

Throw out the present proposed management strategies. Create one that actually makes sense. 1.15

Comment D:
School children and rockhounding.

Untold tons of miniature geodes, the size and shape of marbles can be found over hundreds of square miles of the BMGR. Visitors that I have taken to the BMGR include teachers and school children from the east coast who are awe struck by these amazing curiosities. Nothing like them exists east of the Rocky Mountains. Because they are pervasive throughout the range, every teacher and every school child soon determine to collect enough to give out to every member of their class back home. Not noticeable out of the billions strewn across the range.

The letters that we receive back from the classes a few weeks later express profound amazement that such things exist. Scientific curiosities that can be held in a hand and taken home after school. Something to pique scientific interest in a day where science in schools has slipped way past the back burner. 4.1

What a tragedy to sterilize educational opportunities based on a whim. The INRMP even admits (pg 57), "At current levels, rockhounding is not thought to be associated with any measurable effects on general vegetation, wildlife, wildlife habitats, or protected species. However, this measure would protect biological resources from any minor effects that may be occurring in localized areas (e.g., lichens, microhabitats).

The INRMP recommends that the curiosity of our children be stifled because it might disturb a few molecules of lichen. Never mind that walking a few yards outside just about anywhere in North America, or the planet for that matter, will also disturb a few molecules of lichen. Environmental activism has gone far enough. Leave our kids alone!

Summary Comment:

The INRMP Community Report (pg 32) actually states that the range is in good shape! "Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas." 11.20

The next sentence continues, "The management system to be adopted under the proposed INRMP, however, must consider that the range ecosystem has been affected by humans within the region if effective measures to conserve and rehabilitate natural resources and support sustainable public use within the BMGR are to be implemented."

In other words, if the INRMP does not "assume" that "human" damage must have occurred somewhere, it will be difficult to conserve and rehabilitate these *undamaged* natural resources and support sustainable public use. 11.20

Logic in this vein will next declare that the sidewalks of New York must be closed to foot traffic because if allowed to continue the "cultural" significance of the sidewalks may be diminished. Unfettered activism at its best.

Cultural resources (pg 32). "The same factors that have helped to preserve the natural resources of the BMGR-exclusion of surface disturbing, non-military land uses and correspondingly limited land surface disturbance by military activities-have also helped to protect cultural resources. As a result, well-preserved cultural remains within the BMGR provide a remarkable record that tells of thousands of years of human habitation and use of this region." 14.1

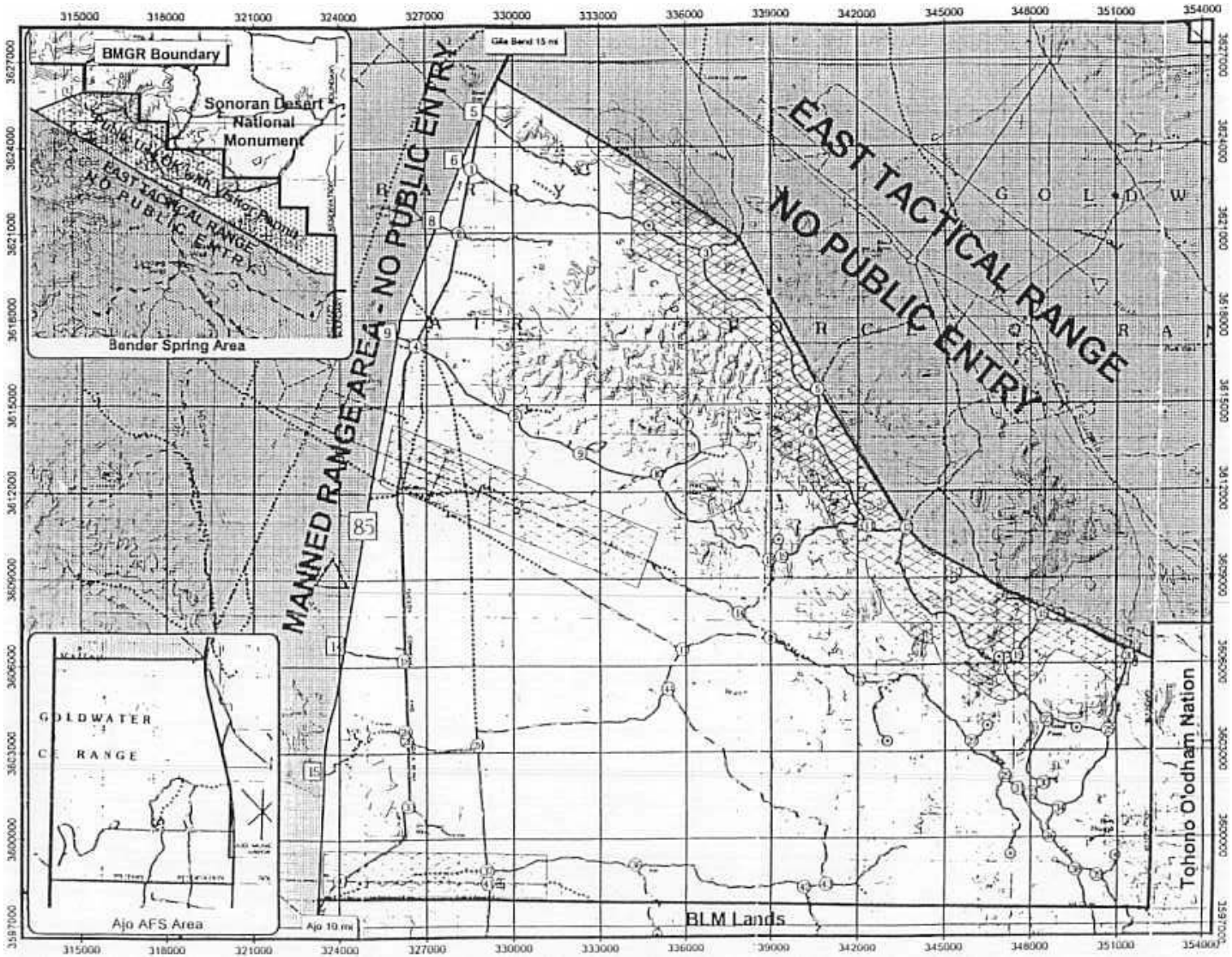
With this the INRMP admits that visitors, over decades, have done a good job of preserving cultural artifacts on the BMGR even without a range permit, video instruction and enforcement by a BLM officer.

In reference to road closures, the INRMP (pg 55) offers that reducing of what they term "redundant" road networks and any associated activity would result in a benefit that would be low to moderate, depending on plant communities, wildlife habitat, and wildlife occurring within these site-specific areas. Who makes the determination which roads are redundant? Was that determination based facts gathered from dialogue with the people who use the roads or was the determination based on some other sort of study? The obvious, if people stay on existing roads, even the most delicate habitat will thrive, if and when the weather cooperates! 1.10

The 89 pages of the INRMP Community Report is a tragic mistake! Perhaps the complete 1000 page study makes more sense. More likely, it is just the same mistake with more pages.

The entire INRMP should be referred to a panel of scientists who can be objective. Scholars with the ability to problem solve. Scholars that believe that people have a right to inhabit the planet and share in its resources, in its cultural heritage and enjoy the boundless curiosities that it has to offer. Scholars that are capable of recording truth, with all of its jewels, with all of its warts. 11.28

To the school child, give resource to the treasure of curiosity. Throw out the INRMP proposed management strategy. Create a management strategy that fulfills the mind and stretches the imagination to peer into new vistas. Into cultures of the past, to geology, to history and to just a good trip into the desert with friends and a picnic.



Barry M. Goldwater Range Air Force

Sauceda Mountains Recreational Use Area (Area B

Visitor Use Map

Map ersion July 2002

Legend

- Intersections
- ENTRY GATES
- WATER CATCHMENT
- MILITARY USE ONLY
- MANAGEMENT USE ONLY
- FOOT TRAVEL ONLY
- RECREATIONAL USE
- NO OVERNIGHT CAMPING
- NO PUBLIC USE

UTM Zone 12
NAD 1983

Vehicle tracks, trails, washes, etc. not shown on this map are not part of the official road system for this area. Driving off of the designated roads shown on this map will be considered off-road driving and is not permitted on the BMGR.

SPECIAL NOTES:
Roads are not maintained.
Road between intersections 12 and 21 may nearly impassable in places, even with high clearance 4x4 vehicles.

- ✓ **Public Safety**. Visitors are responsible for their own safety while on the range. Undocumented aliens and drug smugglers are known to cross the range, sometimes in large numbers, and are especially prevalent along the Highway 85 corridor but can occur anywhere. Secure your vehicle and other belongings if you plan to be away from your campsite.

- ✓ **Entry Permit.** You must have a valid permit to enter the Goldwater Range. A separate permit is required for each individual adult, not for each carload of people. You must have the permit in your possession at all times while on the range. ***You are required to call Security Forces at (928) 683-6200/6220 and inform them of your arrival and departure from the range.***

- ✓ **Unexploded Ordnance**. Munitions may be encountered anywhere within the range, lying on the ground or partially or completely buried. Collecting or disturbing any type of military ordnance or debris is potentially lethal and therefore prohibited. *No one can tell if ordnance is safe from its appearance, so it must be treated as deadly. You must keep away from all ordnance. Do not touch it or try to move it. Report any ordnance you may find to Security Forces upon your departure.*

- ✓ **Roads, Vehicles and Driving**. Driving off of roads shown on this map is not permitted except as described below.

    - All vehicles must be licensed and street legal according to the Arizona Department of Motor Vehicles. Four-wheel drive vehicles are recommended.
    - Each driver must have a valid driver's license.
    - No vehicles are permitted more than 50 feet from public use roads (2 car lengths).
    - Owners/drivers of vehicles found further than 50 ft from the road or traveling on unauthorized trails or washes will be escorted from the range and have their visitation privilege revoked.

- ✓ **Wildlife**. There are several threatened, endangered, and sensitive species whose habitat includes the range. These include the Sonoran pronghorn antelope, lesser long-nosed bat, and the Acuña cactus. These sensitive species are protected by law and may not be collected, killed, harmed or harassed in any way.

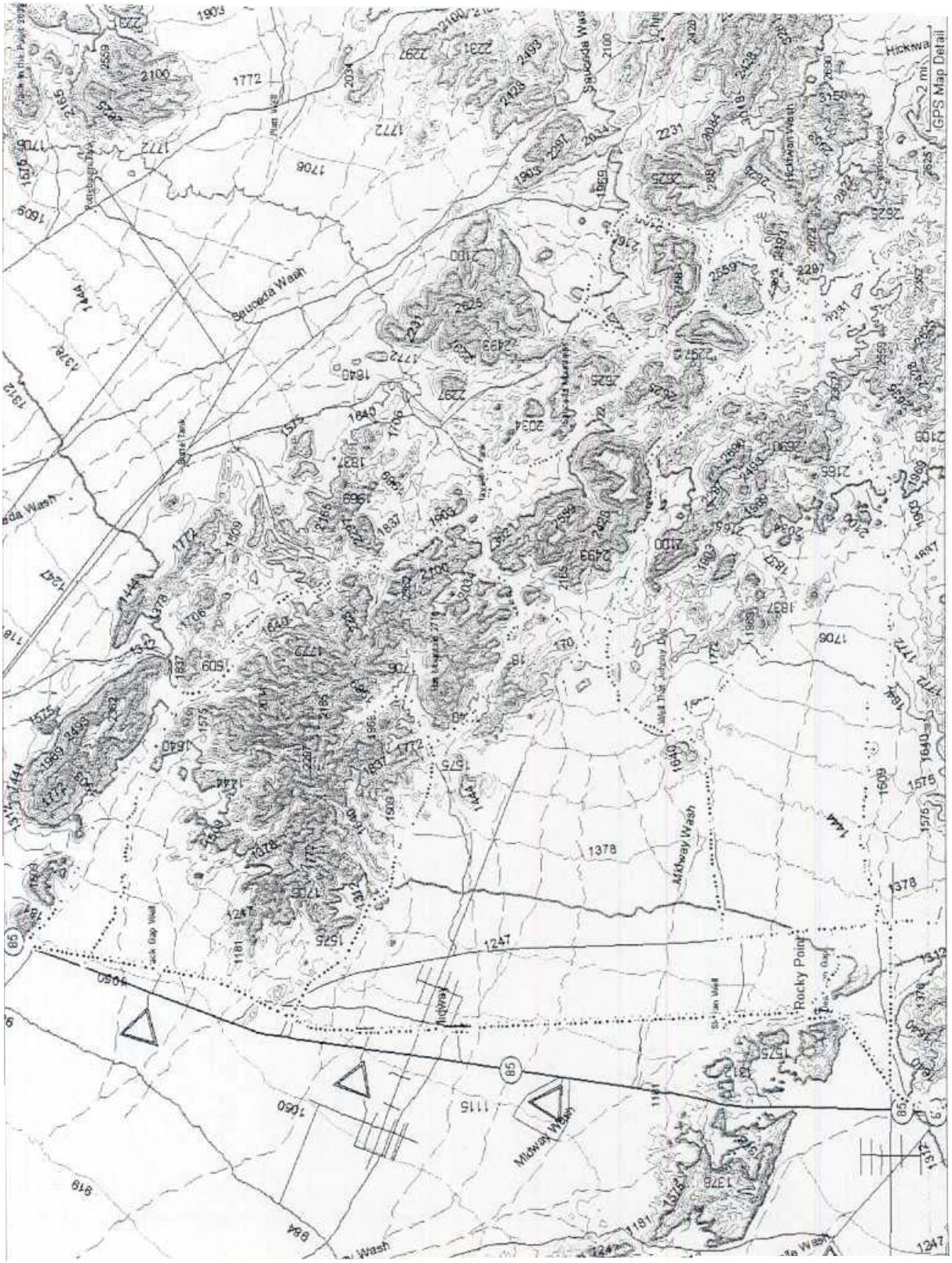
- ✓ **Cultural Resource Protection**. All historic and prehistoric artifacts and sites are protected by law and may not be disturbed in any way. Collecting artifacts, and defacing or damaging any cultural resource material is prohibited by law and punishable by a fine of up to $100,000 and up to one year imprisonment.

- ✓ **Hunting**. Legal hunting seasons are established for some game species on the Goldwater Range. You must have the appropriate hunting license and tag from the Arizona Game and Fish Department.

- ✓ **Camping.** Camping is limited to 14 days in any 28-day period. Camping is permitted except where otherwise posted or in the restricted areas shown on the map. State law prohibits camping within a quarter-mile of water holes. When you break camp, disperse fire rings and remove all traces of human visitation. A garden rake can be used to smooth out tire tracks.

- ✓ **Metal Detectors**. Use of metal detectors for locating metallic objects is not permitted due to unexploded ordnance hazards.

Plant Collection. Plant collection is prohibited by law.


Saucedo Wash
Midway Wash
Rocky Point
Hickman Wash
GPS Map Detail
Jack Gap Well
Saucedo Tank
Hickman Peak
Hickman Mesa
Midway Mesa
Saucedo Mesa
Sheep Mesa
Sheep Tank
Saucedo Well
Midway Well
Sheep Well
Hickman Well
Hickman Tank
Saucedo Peak
Sheep Peak
Jack Gap Peak
Jack Gap Tank
Jack Gap Wash
Midway Tank
Midway Peak
Midway Mesa
Midway Wash
Rocky Point
Rocky Point Well
Rocky Point Tank
Rocky Point Wash
Rocky Point Mesa
Rocky Point Peak
Rocky Point Tank
Rocky Point Well

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Arizona Desert Bighorn Sheep Society, Inc
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(480) 854-8950 – fax (480) 854-8966
www.adbss.org

April 30, 2003

Barry M. Goldwater Range
Integrated Natural Resource Management Plan
P.O. Box 67132
Phoenix, Arizona 85082-7132

Re: Comments on the Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan (INRMP)

Dear Colonel James Uken and Core Planning Team Members:

The Arizona Desert Bighorn Sheep Society, Inc. (ADBSS) appreciates the opportunity to review the aforementioned document (INRMP) and would like to provide the following comments for the public record. The ADBSS is a 36-year old wildlife conservation organization of over 1,100 active and hard working members dedicated to the conservation and welfare of bighorn sheep within Arizona. For a number of years the ADBSS has been involved in the various resource and land management planning processes for the Barry M. Goldwater Range (BMGR) and is pleased to finally see this long awaited plan reach the draft stage. It has been a long journey since the previous HMPs of 1997 and the withdrawal LEIS of 1998. The BMGR is in dire need of a completed plan.

The ADBSS would very much like to support the Proposed Action and Preferred Alternative, however, a number of key elements would require some degree of modification. With the comments presented below, the ADBSS proposes a course of action, which, in our view, combines the necessary resource management elements required to enhance desert bighorn sheep populations on the BMGR while allowing for an appropriate level of human activity without compromising the military's training mission. If these modifications cannot be accommodated, the ADBSS would then be forced to only support the No Action-Alternative A, which simply adopts the previously prepared HMPs. We trust that these recommended modifications will receive appropriate consideration and that an amicable final decision will result. 1.4 11.10

Of the seventeen (17) resource management strategy elements identified in the INRMP, the ADBSS has no issue with a majority of the respective proposed actions. The elements, that do not affect the mission of the ADBSS, and which the Proposed Action can be supported, are as follows:

1. Resource Inventory and Monitoring
2. Special Natural/Interest areas
6. Rockhounding
7. Wood Cutting, Gathering, and Firewood Use. Plants
9. Recreational Shooting
10. Utility/Transportation Corridors

12. Special Status Species
13. Soil and Water Resources
14. Air Resources
15. Visual Resources
16. Wildfire Management
17. Perimeter Land Use, Encroachment, and Regional Planning

The resource management strategy elements that the ADBSS does have an issue with are discussed below with our respective comments for modifications:

Element 3-Motorized Access and Unroaded Area Management

The ADBSS feels that several roads currently proposed for closure in one alternative or another should remain open to the public. Marked up copies of the road system alternative maps (figures 3-1 and 3-2) are enclosed and are presented as Exhibit 1 and Exhibit 2 to these comments. These marked up map exhibits identify a total of 28 specific and keynoted areas or instances where existing roads should remain open to the public under the proposed action. These keynoted roads are not redundant and provide valuable and beneficial public access to many otherwise inaccessible areas. Examples of roads that should remain open are on the east and west sides of the Mohawk Mountains, the east and west sides of the Copper Mountains, along the northern and eastern boundary of the Cabeza Prieta National Wildlife Refuge, roads accessing the Granite Mountains in Management Units 4 and 5, roads accessing the Growler Mountains and the Growler Valley in Unit 5 and several roads in Unit 6. 1.4

Roads terminating at the Cabeza Prieta boundary that are labeled "Not Needed For Refuge Management" must remain open to the public as they are especially vital for providing reasonable and much needed public access to the refuge. In many instances, these roads are the only way to gain access to the remote boundaries of this vast wilderness and they must remain available to the public.

The ADBSS is especially opposed to the proposed "Agency Use Only" or "Government Use Only" road designations. In all cases, if a road exists it should also be made available for public use. As many of the proposed closures do not present a real safety or security concern or a legitimate conflict with agency missions, there is no compelling reason to restrict public access to these roads and especially those that are in public access Management Units. This concern is particularly applicable to the roads along the Cabeza Prieta boundary, the proposed Cabeza Prieta bypass roads in Management Unit 2, the road on the east side of the Copper Mountains, the north exit from the Copper Mountains between Units 2 and 3, the sand dune road and north Sierra Pinta road in Unit 3, and the target run-in-line roads in Unit 6. We must note that the ADBSS supports the construction of the proposed Cabeza Prieta bypass roads but only if these roads will be made available to the public. 1.8 1.23 1.27

Element 4-Camping and Visitor Stay Limits

The ADBSS would like to see the proposed action allow vehicle based camping within 100 feet of roads. Extending this from the current limit of 50 feet would provide more dispersion and 3.1

dilution of this minimal impact. Given the infrequent amount of overnight camping that occurs on the range we do not see the increase of this limit as having adverse impacts to any resources. 3.1

The ADBSS opposes the overnight camping restrictions within the Mohawks Mountains in Management Unit 4 and on the east side of the Sauceda Mountains in Unit 6, since both significantly compromise recreational activities including sheep hunting. Any perceived safety or natural resource protection concerns in these areas can easily be accommodated with special instruction or cautions. At a minimum, overnight camping in these areas should be allowed annually during the months of October through January. We remind you that more than 62% of the BMGR is already closed to the general public and that further restricting the use of the remaining 38% does not appear warranted or in compliance with the Sikes Act's mandate to provide multipurpose uses of military installation natural resources. 1.15 3.3

Element 5-Recreational Services and Use Supervision

Special Use Permits for desert bighorn sheep hunting parties in Management Units 4, 5, 6 and 7 should be allowed to continue and be specifically identified in the proposed action. Access to these Management Units is critical to providing bighorn sheep hunting access to the west side of the Mohawk Mountains, the north portion of the Cabeza Prieta National Wildlife Refuge (specifically the Mohawk, Bryon, Granite, Growler and Childs Mountains), and the Sand Tank Mountains (including Paradise Well). 1.25

The ADBSS is concerned about the status of sportsmen access to the Paradise Well area in the Sand Tank Mountains. A significant investment of sportsmen dollars has been made in wildlife management activities and consideration should be given to reopening the area to sportsmen. 1.32

The proposed action should not restrict motorized travel in all washes. Vehicular travel in accessible dry washes should be allowed, as this often can be the most responsible and ecologically benign means of providing access. Any minimal impacts form vehicular travel are more easily erased with rainfall in dry washes than with surface roads. 1.1

Vehicle limits and special use permit requirements should remain unchanged under the proposed action. The merit behind the proposed restrictions of 20 and 10 vehicles in various Units is not understood, appears overly restrictive and is certain to unintentionally thwart future volunteer wildlife conservation activities. 1.12 2.53

The ADBSS supports the current annual permit system and agrees that it should be maintained under the proposed action (without a fee). 2.33 5.6

Element 8-Hunting

The ADBSS supports the continuance of existing game management programs. 2.2

We are opposed to any consideration towards establishing a special hunting permit program that requires a payment of a fee. The problem with implementing wildlife management, protection and conservation activities on the BMGR has never been from a lack of funds but rather from a lack of cooperation from the Range Management Office. Sufficient funding sources currently 2.33

exist that are already underwritten by sportsmen and which can accommodate almost any foreseeable need. We see no benefit or justification to further tax this mutually beneficial activity. 2.33

The ADBSS would like to see the proposed action include some consideration towards the reopening of the Crater Range and the Aquila Mountains to sheep hunting. At some point, the use of sportsmen's dollars for the management of wildlife in these areas will no longer be warranted if these efforts will never provide hunting or other wildlife dependent recreational opportunities. It is understood that these areas are in tactical ranges, but it is also realized that with weekends and some seasonal efforts towards range scheduling and consolidation, these areas could become "cold" long enough to conduct a meaningful hunt. We are also aware that as technology changes so may the need for such expansive and redundant training areas. Currently the wildlife in these areas might as well be on the moon for all the good they are providing to the public. 1.25

Element 11-General Vegetation, Wildlife, Wildlife Habitat and Wildlife Waters

The ADBSS supports the proposed action allowing the construction of new wildlife water developments as well as the continued maintenance and repair of existing wildlife waters. The proposed action should also include the redevelopment of existing waters as a maintenance and repair function if deemed necessary to provide reliable and cost effective service. We are also concerned that the proposed action limits the number of new water developments to a total of six that can be constructed over the next five years and suspends after five years any further additional water development activities pending the outcome of a special expert panel evaluation. We believe that sufficient evidence exists to warrant the continuance of a wildlife water program as a beneficial activity and this program should be allowed to continue unencumbered until such time that it is proven contrary. Consequently, the proposed action should allow the planned development of the 14 remaining bighorn sheep waters identified in the previous Lechugilla-Mohawk Habitat Management Plan and Environmental Assessment, which was finalized in 1997, and the Draft Barry M. Goldwater East Habitat Management Plan and Environmental Assessment, in affect adopting and continuing these HMPs through this INRMP. 2.7 2.8 2.10 2.16 2.18 2.8

INRMP Section 4.6.4 (Information Not Currently Available to Support General Wildlife and Wildlife Habitat Resource Management) seems to place great confidence in additional research and evaluations for determining the ecological value and effects of existing and future wildlife water developments. The background information provided on this topic in the plan seemed balanced and addressed both the pros and cons of desert wildlife water developments. It is the ADBSS's assessment, in its review of the scientific literature, that the preponderance of this literature demonstrates that desert wildlife water developments are beneficial to wildlife as opposed to being negative or neutral. We support valid scientific inquiry and further literature review on this topic and believe both will stand on their own merit. We are simply opposed to ceasing a known beneficial activity on the whim that future analysis may find presently unknown negative or neutral consequences. The wildlife on the BMGR deserves more responsible and proactive treatment than this. If the analysis proves otherwise, then the plan can be amended to account for such new information. 2.18

By implementing those resource management elements from the proposed action, as listed previously in this letter, and by implementing the modified elements as proposed by ADBSS that do not conform to the proposed action, we feel the plan will meet the statutory requirements of both the Military Lands Withdrawal Act of 1999 and the Sikes Act. The ADBSS feels our proposed management elements are capable of meeting the military's needs for conservation, rehabilitation and sustainable multipurpose use of natural resources, especially wildlife, on the Barry M. Goldwater Range.

Thank you for the opportunity to comment and we look forward to the timely completion of the Final INRMP/EIS.

Sincerely,

William Keebler

William Keebler
President
Arizona Desert Bighorn Sheep Society

Enclosures: Exhibit 1 – Marked Up Copy of Map Figure 3-1
Exhibit 2 – Marked Up Copy of Map Figure 3-2

xc Senator John McCain
Senator Jon Kyl
Congressman Raul Grijalva
John Kennedy, AGFD
Bill Horn, USSA

Center for Biological Diversity

Protecting and restoring endangered species and wild places of North America and the Pacific through science, policy, education, citizen activism and environmental law.

April 29, 2003

Col. Jim Uken, USAF
BMGR INRMP
POB 67132
Phoenix AZ 85082-7132

Col. Uken,

The Barry M. Goldwater Range contains some of the best and largest portions of the Sonoran Desert in the U.S. It is a special place, and our 7500+ members across Arizona and the nation want it protected.

After 60 years of use by the Air Force and Marines, about 85% of the Range remains undisturbed, with individual roadless areas over 100,000 acres. The military presence has meant exclusion of livestock and mining, and most of the military use has been in the air. Top threats to wildlife and native vegetation come from growing recreation, off-road vehicle use and border law enforcement and migration activity, but the military is under intense pressure to open more roads and increase recreational access. This pressure must be resisted. Greater and more widespread civilian use could actually interfere with military training there while also damaging the fragile landscape. 1.18 1.31

The Center for Biological Diversity would like to see in the final INRMP:

No driving in washes. Vehicles in washes harm wildlife and habitat. Washes have high biodiversity, and are key habitat areas for rare plant and animal species. The plan does not attempt to inventory washes and might allow any wash to become a legal road. 1.2 1.22 2.58

Fewer roads, not more. Limit driving to roads that are signed "open". Close and revegetate roads not needed for official missions. Close and revegetate roads which damage or threaten sensitive plant, wildlife, cultural, or scenic areas. Allow use by only street legal vehicles, and keep off-road vehicles out of the BMGR. Stop Border Patrol off-road driving, and limit low-level helicopter flights. 1.7 1.10 1.30 7.1 7.3

Increase the size of roadless areas. Rehabilitate unneeded roads and damaged areas. Wildlife, including the critically endangered Sonoran pronghorn, benefit from large, un-roaded areas. 1.9 2.60

Fully protect archaeological and cultural sites. 14.1

Establish detailed monitoring plans, time lines, budgets, goals and consequences for the plan. This plan currently has none of the above. 11.1 11.2

Considering the enormous damage from illegal uses of the Range, the lack of funding and staff, the lack of clear management goals, time lines, and consequences, the cumulative effects of legitimate uses, the variables of climate, and the military mission, Alternative D is the only reasonable, prudent, and sustainable option in this plan. 7.4 11.1 11.9

We support the proposal to close 658 miles of roads, and encourage the military to go beyond this and close the 765 miles of road that they identified for potential closing. This will better protect the environment, especially since many of these roads are redundant (go to the same place) or are no longer needed by the military. 1.6 1.7

We support the proposed plan element that closes all washes to vehicles unless they are part of a designated road. Also support the provision of the plan that closes all routes unless they are designated as open by the plan. 1.2 1.13

We support the plan proposal to manage roadless areas of 3000 acres or more as roadless and for conservation—but point out that this means these areas should be managed as if they were wilderness. 1.9 1.11

We support redesignation of the Flat-tailed Horned Lizard Habitat Management Area and also support redesignation of the Areas of Critical Environmental Concern that were established when the Bureau of Land Management was managing natural resources on the Goldwater Range. These ACECs are the Mohawk Mountains and Sand Dunes ACEC, Tinajas Altas (High Tanks) Mountains ACEC, and Gran Desierto Dunes ACEC. Advocate continued protection for Sentinel Plain Lava Flow Special Resource Management Area and Crater Range Special Resource Management Area. 9.2

We support the monitoring plan with the provision that key indicators be truly representative of the ecosystem on the Goldwater Range, and advocate corrective action kicking in before measures of resource degradation hit critical values. 13.7

We support the camping limit of no more than fifty feet from the center of the road. This will help the environment from getting torn up by vehicles seeking campsites, and we further support camping only in previously disturbed and established sites. 3.2

We support the plan proposal to prevent the public from entering mines on the Goldwater Range both to protect bats and to promote public safety. Known bat sites should be gated to exclude human entry, but not bats. 2.55 5.1

We support increased law enforcement across the BMGR aimed at stopping illegal and damaging recreational use. 8.2

We strongly oppose construction of the Area Service Highway through the Goldwater Range. This limited access road, which will travel east from San Luis until it reaches the Goldwater Range and then turn north, will destroy Flat-tailed Horned Lizard Habitat both on and off the Goldwater Range. The road is a clear case of encroachment on a military reservation and supporting a high-speed highway does nothing to further the military purposes for which the Goldwater Range was established. In fact, it is a threat to these purposes. Once the road is built, there will be pressure to open up the Goldwater Range to more development and eventually, pressure to sever the area from the Goldwater Range. The route of the Area Service Highway should instead be close to the cities of Yuma, Somerton, Gadsden, and San Luis so that residents of these towns will have a much safer way than now (US 95) to get to their jobs and for other purposes. 12.1

We support the plan proposal to ban collecting dead and down wood in management areas 1, 4, 5 and 7, and in addition recommend a ban on collecting dead and down wood in special management areas, such as Areas of Critical Environmental Concern. 3.5

We support the elimination of non-game species collection (except for legitimate, specifically permitted scientific purposes). This will hopefully reduce harassment of many animal species and will keep the gene pool healthy, as collectors tend to go for "trophy" specimens. 2.35

The military is proposing to allow unrestricted recreational (non-hunting) shooting on the Goldwater Range, including even automatic weapons and shooting at night if a permit is obtained for the latter two activities. This is a big mistake. The noise, danger and trash that would result is inconsistent with the legislation withdrawing the lands for military use (see next item). For public safety, non-hunting shooting should be confined to limited and well-demarcated areas specifically established for target shooting and marksmanship. The Goldwater Range isn't one of these areas. 6.1

The legislation withdrawing the Goldwater Range provides that the plan shall "include provisions for proper management and protection of the natural and cultural resources of such lands, and for sustainable use by the public of such resources to the extent consistent with the military purposes for which such lands are withdrawn and reserved . . . ." Thus, while managing for protection of natural and cultural resources is mandatory, public use may occur only if it is **sustainable** in relation to the environment, and only if it is **consistent** with the military mission. Consequently, recreation is not an equal use with sustainable resource management, because recreation must not impair sustainable resource management. This is important to realize as people make their requests for various types of recreation on the Goldwater Range. 11.7

Please keep us fully informed as the INRMP process evolves.

Thank you,

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May 7, 2003

Certified Mail/Return Receipt Requested
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To Whom it May Concern:

Defenders of Wildlife is a national nonprofit organization dedicated to the protection of wildlife in its native habitat. As an integral part of its mission, Defenders is actively involved in efforts to preserve Arizona's unique Sonoran Desert, one of the most biologically rich and diverse desert ecosystems in the world. In connection with these efforts, Defenders has been working for many years to protect the critically endangered Sonoran pronghorn, a subspecies of pronghorn that is specially adapted to life in the arid desert. Defenders has also worked extensively to protect the Sonoran Desert ecosystem as a whole, as well as other sensitive and protected species that depend on this ecosystem, such as the flat-tailed horned lizard (FTHL) and cactus ferruginous pygmy-owl.

On behalf of Defenders' more than 440,000 members, please consider the following comments as you prepare the Final Environmental Impact Statement (EIS) for the Barry M. Goldwater Range (BMGR) Integrated Natural Resources Management Plan (INRMP). Due to our organizational focus on wildlife and habitat issues, and in particular our extensive involvement in pronghorn and FTHL conservation issues, most of our comments on the Draft Environmental Impact Statement (DEIS) are directed at these concerns. However, we also begin by offering a few general comments below regarding the scope and content of the DEIS.

General Comments

Lack of Concrete Plans, Timelines, and Details

Before touching upon specific resource management concerns, it is worth noting as a general matter that, although the DEIS does address a wide range of possible management measures and resource concerns, the document is largely lacking in substance. In other words, the "plan" that is presented appears to revolve primarily around developing more plans, rather than around developing specific resource objectives and implementing concrete management measures to achieve those objectives. There are many potential plans, for instance, but no clear roadmap as to how and when BMGR intends to attain them. There are no details about proposed actions, and no actual schedules, deadlines, timelines, and budgets for completing them. Although examples of this defect permeate the DEIS, we will highlight two here: (1) wildlife water 11.1

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developments are discussed at length and in numerous sections of the document, yet nowhere is there an actual description of the location and timing of these developments or how these decisions will be made; and (2) prior special management designations for ACECs will apparently be carried over with the INRMP, but the DEIS leaves entirely unclear what, if any, management prescriptions will be attached to those designations to protect the underlying resources, as well as when and through what process those decisions will be made. A comprehensive INRMP, and a meaningful ability to comment on any plan, simply require more. 9.1 11.1

Sikes Act Compliance

The Military Lands Withdrawal Act (MLWA) of 1999 explicitly directed preparation of an INRMP that shall "include provisions for proper management and protection of the natural and cultural resources, and for sustainable use by the public of such resources to the extent consistent with the military purposes for which the land are withdrawn and reserved" (P.L. 106-65 Sec. 3031(b)(3)(E)(i)). The Sikes Act mandates that an INRMP shall provide for management of fish and wildlife, land, and other natural resources with certain specific requirements. Several of these requirements are not fulfilled by the current draft INRMP under consideration, as reflected in the DEIS.

First, the Sikes Act requires, "to the extent appropriate and applicable," that INRMPs shall provide for "integration of, and consistency among, the various activities conducted under the plan." 16 U.S.C. § 670a(b)(1)(D). As explained in more detail below, the plan presented in this INRMP/DEIS does not integrate activities and management measures, particularly with respect to the Sonoran pronghorn. Similarly, because so many of the possible actions under consideration are insufficiently explained, it is virtually impossible to assess their consistency. For instance, without knowing whether, where, and when planned wildlife water developments will be implemented – and the particular resource concerns that will make a given development "high priority" – it is impossible to evaluate whether such an action will be consistent with other management measures affecting the same region, such as public access and road closure provisions. 11.6

Second, the Sikes Act requires, "to the extent appropriate and applicable," that INRMPs shall provide for "establishment of specific natural resource management goals and objectives and time frames for proposed action." 16 U.S.C. § 670a(b)(1)(E). As noted above, and further explained at length in the section below addressing Sonoran pronghorn management, the DEIS is woefully lacking in "specifics" – whether it's details about the plans under consideration, explanation of the resource goals to be attained, or actual deadlines for completion of actions. 11.1

Third, the Sikes Act requires, "to the extent appropriate and applicable," that INRMPs shall provide for "sustainable use by the public of natural resources to the extent that the use is 11.7

not inconsistent with the need of fish and wildlife resources." 16 U.S.C. § 670a(b)(1)(F). Thus, although the Sikes Act contemplates the possibility of public access to and use of natural resources on military lands, this provision clearly reflects that wildlife concerns must take precedence over public use. Congress has already made this decision. The DEIS, however, fails to reflect this prioritization, and appears in some instances to bend over backwards in an effort to appease prospective recreational and public users of the BMGR by maintaining as much access and use of the Range as possible. 11.7

Finally, the Sikes Act requires, "to the extent appropriate and applicable," that INRMPs shall provide for "enforcement of applicable natural resources law (including regulations)." 16 U.S.C. § 670a(b)(1)(H). As explained at more length below, the DEIS as it currently stands arguably violates the National Environmental Policy Act (NEPA) and/or the Endangered Species Act (ESA), among other laws. Moreover, the DEIS should clearly state that all actions undertaken by the military, other agencies, and the public on the BMGR must comply with these laws aimed at resource protection. 11.8

Cumulative Impacts Analysis

As an essential element of the required impact analysis, NEPA's implementing regulations require agencies to thoroughly examine and assess the cumulative impacts of their activities – i.e., "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency ... or person undertakes such other actions." 40 C.F.R. § 1508.7. "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7. Likewise, as described in the CEQ's principles of cumulative effects analysis, "cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects." CEQ Handbook at 8. Without incorporating any meaningful descriptions of proposed actions and integrating the full range of relevant natural resources management activities (such as for the Sonoran pronghorn, described below), it is difficult to assess cumulative impacts of the proposal in this DEIS. This difficulty is clearly reflected in section of the DEIS on cumulative impacts, which is disjointed and incomplete. 11.16

The goal of the cumulative impacts analysis is to bring different categories of impacts and different sources of information together in a single analytical process that can actually assess combined, interactive, and countervailing impacts on the affected resources. However, while this DEIS appears to acknowledge the significance of complex factors – such as resource connectivity in assessing cumulative impacts to the pronghorn, FTHL and other sensitive resources, DEIS at 6-3 – the cumulative impacts discussion fails to actually follow through with meaningful treatment of these issues. Instead, impacts beyond the broad scales of "ecological landscape" and

"human community" are essentially relegated to summary charts. With respect to the cumulative impacts analyses for the pronghorn and FTHL, for instance, the DEIS does little more than admit that certain types of impacts/activities will likely have "additive or interactive impacts" on the relevant species. This "analysis" is unsufficient under NEPA. 11.16

To the extent that this DEIS appears to rely on the earlier analysis of cumulative impacts to the pronghorn stemming from the Marine Corps' September 2001 EIS (DEIS at 6-22), we hereby incorporate by reference our July 2001 comments on the draft version of that EIS. 11.17

Transportation/Road Issues

We support the proposed plan element that closes all washes to vehicles unless they are part of a designated road, as driving through washes directly harms wildlife and degrades important habitat. While we also support the provision of the plan that closes all routes unless they are designated as open, there is no provision that allows for a comprehensive inventory of the wash system found on the range. This is an especially important provision and one that must be included, considering the extensive nature of the wash system found in the area. Should there be no clear delineation of what is a road and what is a wash, there is potential for this wash system to turn into a *defacto* transportation system, providing access to virtually the entire range and threatening natural and cultural resources, as well as the purposes for which the range was withdrawn. Vehicle access should therefore be limited to only those roads clearly marked and signed as being open. No public off-road vehicle use should be allowed, and military off-road use should be kept to the minimum necessary to achieve the military mission. 1.2 2.58 1.13 1.22 1.13 1.21

For the same reason, we also support the proposal to close roads that are deemed no longer necessary, particularly those which damage or threaten sensitive plant, wildlife, cultural, or scenic areas. We strongly recommend that the entire 765-mile inventory of roads that has been identified for potential closing be closed, and that a provision be put in place that provides for restoration opportunities for those roads which cut through sensitive habitats for imperiled wildlife such as the pronghorn. 1.7 1.9

Large, roadless areas are incredibly important for many wildlife species, including the pronghorn, bighorn sheep and mountain lion, all of which are species of concern on the range, and so we enthusiastically support the plan proposal to manage roadless areas of 3000 acres or more as roadless and for conservation. In order to accomplish this goal, we strongly suggest that management of these areas closely mirror management activities for federally-designated wilderness areas. 1.9 1.11 2.60

Recreational Activities

We agree that camping should take place no more than fifty feet from the center of the road. This will help to curb off-road activities that damage and destroy sensitive desert habitat. 3.2
We also agree that camping should be prohibited within 1/4 mile of natural watering holes (known as *tinajas*) or water developments, and strongly urge that this prohibition be extended to hunting activities in order to protect wildlife that depend on these water sources to survive. 2.23

We very strongly disagree that there should be unrestricted recreational (non-hunting) shooting on the Goldwater Range. The plan proposes to include even automatic weapons and shooting at night if a permit is obtained. The noise and extreme danger of these activities are inconsistent with the legislation withdrawing the lands for military use, and are also entirely inconsistent with conservation of wildlife and habitat, as well as other recreational activities for which the range is used. For these reasons as well as overall public safety, non-hunting shooting should be confined to limited and well-demarcated areas specifically established for target shooting and marksmanship, none of which exist on the range. 2.26 6.1

Special Natural/Interest Areas

We support the proposal to redesignate the existing Areas of Critical Environmental Concern (ACECs) as Special Natural/Interest Areas (SNAs). The Tinajas Altas Mountains, Gran Desierto Dunes, and the Mohawk Mountains and Sand Dunes are indeed areas that "contain natural resources that warrant special conservation efforts" (DEIS at 4-244). We are concerned, however, with the lack of prescribed management objectives for these areas in the DEIS.

The proposed SNA management strategy alternative (Strategy C, DEIS at 3-15) only allows "for development of special management provisions as needed for resource protection", as opposed to actually identifying what those management provisions will be. Yet the DEIS itself, quoting DoD Instruction 4715.3, Environmental Conservation, Section 6.2.5, specifies that the "integrated natural resources management plan for the installation shall address special management provisions necessary for the protection of each area." We believe all of the existing management provisions of these former ACECs (outlined on DEIS pages 4-237 through 4-239) are still appropriate and necessary to protect the natural resources of these special areas. These management provisions should be codified in the final INRMP as specific management strategies for the SNAs. A final management provision for each SNA should contain an adaptive provision as suggested in the DEIS allowing for the continued development and refinement of management strategies to best protect resources based on inventorying and monitoring. 9.1

We also support the proposed action to evaluate the potential for "establishing additional special natural/interest areas based at least in part on natural communities and plant and wildlife species that are identified as conservation elements for the BMGR or to better management special geologic, scenic, cultural or other natural areas" (DEIS at 3-15). In this regard, and in 2.45

light of our comments below, we strongly urge the BMGR to explore the designation of one more special natural/interest areas for the Sonoran pronghorn. As explained in the DEIS, the pronghorn "was identified as a conservation element [for the BMGR INRMP] to allow for completeness and because the [pronghorn's] presence plays a role in determining appropriate recommendations for designating special management areas and/or development management standards for a particular area of the BMGR that is within its range" (DEIS 4-110). The DEIS also separately proposes to "identify key areas (e.g., pronghorn concentration areas, fawning grounds, wildlife corridors) and implement restrictions on activities as needed to protect and conserve habitat, ecosystems, and biodiversity" (DEIS at 3-19). The statements, as well as our comments below, underscore the importance of the pronghorn as a management element for the Range and support the concept of one or more specially designated areas to ensure adequate protection for the species. Examples, as suggested by the language of the DEIS itself, would be areas that are known to be particularly significant for supporting pronghorn fawning, foraging, or other crucial biological need/activities.

Specifically, there are a number of habitat types that are essential for the continued viability of the Sonoran pronghorn that deserve additional protection. Hervert et al. (2000)[1] found that Bajada habitats were preferred by pronghorn over other habitats regardless of the time of year. The study states, "[w]e believe this habitat is critical to Sonoran pronghorn viability because of the frequency and likelihood of drought." They found that pronghorn preferred washes in the dry summer season, sacrificing visibility for thermal protection and increased forage. And they confirmed that chain-fruit cholla is extremely important for pronghorn to maintain hydration. 2.45

Hervert et al. (2000) included a map of chain fruit cholla distribution and one kilometer buffer zones (figure 9b, p23). While the majority of this habitat is found off the BMGR, the limited distribution in the North TAC and South TAC ranges should be carefully managed. Because of the limited distribution of chain fruit cholla is these areas, their protection will not likely compromise the military training mission of the tactical ranges. Management prescriptions would include avoidance year round of physical disturbance and implement science-based habitat management practices. During dry summer months when pronghorn are present in these chain fruit cholla stands, activities should be reduced in these areas to prevent undo disturbance when pronghorn are their most vulnerable.

Bajada habitats and washes should also be identified and similarly protected.

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[1]Hervert, J.J, J. Bright, M.Brown, L. Piest, R. Henry. 2000. Sonoran Pronghorn Population Monitoring 1994-1998. Technical Report #162. Arizona Gam and Fish Department. Phoenix, Az.

Wildlife/Protected Species Issues

Military lands are increasingly being recognized for their importance to wildlife and wildlife habitat. While the Department of Defense (DoD) manages about 3 percent of the federal domain, 17 percent of imperiled species and 21 percent of federally-listed species are found on DoD lands. The BMGR stands out in particular, as it is located in the heart of the Sonoran Desert and contains one of the most undisturbed desert ecosystems in North America. This land includes hundreds of thousands of roadless acres, as well as crucial habitat for hundreds of plant and wildlife species, including the critically endangered Sonoran pronghorn. Moreover, the DEIS itself acknowleges that the BMGR's military training mission and natural and cultural resource protection are not mutually exclusive objectives. Thus, while each of the comments above is relevant to multiple plant and wildlife species, we also offer the following comments specific to the pronghorn, FTHL and bats.

Sonoran Pronghorn

The Sonoran pronghorn is a highly endangered subspecies of pronghorn that is currently found only in Mexico and southwestern Arizona. The Arizona population of Pronghorn was recently estimated to have **as few as 21-33 animals remaining**. Extirpation within the United States, as well as likely extinction throughout its remaining range, are truly imminent unless immediate action is taken to help save the species, and ecologically sound strategies are developed and implemented to ensure the species' long-term survival.

The Sonoran pronghorn (*Antilocapra americana sonoriensis*) is a subspecies of the pronghorn family that is uniquely adapted to survival in harsh desert conditions. The pronghorn is the fastest land mammal in North America, reaching speeds up to 60 miles per hour. The pronghorn's very limited remaining habitat within the United States lies entirely on federal lands that are managed by multiple Defense and Interior Department agencies, including the Fish and Wildlife Service, National Park Service, Bureau of Land Management, Marine Corps, Air Force, and Army National Guard, and are also used by the Department of Homeland Security's Border Patrol.

Current threats to the pronghorn include habitat degradation and fragmentation, as well as direct injury and mortality, stemming from these agencies' activities – e.g., grazing and fencing, military and border operations, roads and recreational impacts, and others. Although severe drought is currently a major concern as well, the species is ultimately adapted to survival in harsh desert conditions, and the real problem lies in actions that have compromised the species' normal ecological strategies for coping with drought. 2.61

As the DEIS recognizes, the pronghorn is extremely dependent on habitats within the

BMGR for its continued survival (DEIS at S-2). Indeed, approximately 42 percent of the suitable terrain within the current distribution of the pronghorn is located within the BMGR. And as the DEIS notes, the protection of pronghorn habitat from further loss or degradation is one of the critical elements upon which the survival and recovery of the species depends (DEIS at 4-185).

Under these circumstances, it is especially striking that the DEIS does not present a more coherent, concrete plan for Range management with respect to pronghorn conservation. In Defenders' view, the DEIS – or the plan it purports to analyze – is lacking in at least two significant, overarching respects: (1) it fails to integrate the various components of resource management that affect one of the BMGR's most important natural resources – the pronghorn – into a meaningful plan to address the species' plight; and (2) it fails to describe at all many of the potential elements of such a plan, including what actions will be taken, why, when, and how. 2.46

First, although the DEIS does discuss ongoing pronghorn conservation activities in two separate sections, entitled "Interrelationship Between the Military Mission and Protected Species" and "Protected Species Programs," as far as we can tell, these activities are not in fact integrated into the suggested INRMP/DEIS alternatives for management of the BMGR. In other words, the various measures required by biological opinions (BOs) and the Recovery Plan for the pronghorn are apparently treated as something separate from Pronghorn management under the INRMP. In our view, this presentation – and in particular, the failure to incorporate specific elements of the BOs and Recovery Plan into the INRMP/DEIS for Range management – may in fact violate both the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). 2.47

As an example of the shortcoming we are describing, the DEIS itself acknowledges in at least one instance that two of the "alternatives" presented, which are purportedly reasonable and viable alternatives for Range management, would not in fact comply with the BOs for the pronghorn (DEIS at 3-54) (discussing Strategies A and B with respect to road closures, the DEIS reads: "No road closures proposed within the current active range of the Sonoran pronghorn, which is inconsistent with the current Marine Corps and Air Force biological opinions and would leave the potential for vehicle use to affect these animals or their habitat unchanged"). Although the agencies do not choose either of these alternatives as its preferred action, it should go without saying that these alternatives do not qualify as "reasonable" under NEPA, and that adoption of an alternative that is inconsistent with a BO for the pronghorn would violate the ESA's take and no jeopardy provisions. 2.48

As another example, as far as we can tell, the DEIS does not even reference, let alone substantively address, the ongoing consultations that the agencies are purportedly engaged in at the present time, pursuant to a stipulated agreement reached with the plaintiffs in Defenders of Wildlife v. Norton. According to the stipulation, these consultations will be completed in June 2.47

2003. Any measures described in the resulting BOs as mitigation or terms and conditions must also be incorporated into the proposed action and alternatives for the BMGR INRMP/DEIS.

While the DEIS apparently recognizes that the ESA consultations over the pronghorn are "applicable" to development of the INRMP (DEIS at 4-196), the agencies have failed to take the next step and recognize that the measures stemming from the BOs, as well as other recovery actions to which the military agencies have committed their involvement, are an integral component of any INRMP for the BMGR, and must be embodied in the plan accordingly. 2.47

Second and equally disturbing, as we noted above for the DEIS as a whole, the plan is almost entirely lacking in the meaningful substance necessary to describe and evaluate pronghorn conservation. In sum, there are no real descriptions of the planned activities, and no timeframes, deadlines, or budgets whatsoever to support how and when these actions will occur.

As described above, the situation for the pronghorn is extremely dire, and action is urgently needed to save the species from imminent extinction and to recover the species in the long-term. Under these circumstances, we need more than an abstract goal to: "identify key areas (e.g., pronghorn concentration areas, fawning grounds, wildlife corridors) and implement restrictions on activities as needed to protect and conserve habitat, ecosystems, and biodiversity" (DEIS at 3-19). While Defenders strongly supports the concept of this measure, the description provided is far too vague to amount to a "plan" and needs more substance in order to translate into real, much-needed action for the pronghorn. In other words, what types of areas will fall within this provision, how will they be identified, by whom, and when? Once these determinations have been made, what types of restrictions are under consideration, how will the decisions be made, and when will the measures be implemented? 2.46

The DEIS also contains other, similar examples of such ambiguous goals and vaguely-described actions. For instance, with respect to the potential wildlife water developments on the Range, the preferred action would approve six "high priority" developments and defer any others until further research and studies could be conducted to better understand the beneficial and adverse effects of this management action. It is entirely unclear in the DEIS whether one of the six projects would be intended for the benefit of the pronghorn. Certainly from the discussion of the pronghorn in the "Affected Environment" section of the document, it appears as if plans are already underway, yet the DEIS simultaneously asserts that pronghorn waters are just one potential option and simply fails to address how or when that decision will be made. 2.12

Likewise, treatment of predator control in the DEIS is terribly vague. The proposed action would "provide resources, as necessary, for predator control to protect a special status species" (DEIS 3-19). Although no specific proposal or species is even mentioned in the description of the proposed action, elsewhere in the DEIS there is a suggestion that this measure 2.50

would apply to the pronghorn. Moreover, predator control was a key feature of the most recent Recovery Plan for the pronghorn. Yet again, the DEIS is totally lacking in meaningful substance to help evaluate the plan in this regard. For instance, is this measure under consideration for the benefit of pronghorn and/or other protected species, how will the plan be developed to ensure that it is sufficiently narrow and tailored to address the current, dire status of the pronghorn and minimize impacts to non-target species, what monitoring will be established to ensure adherence to the program, and when will all of this occur? 2.50

While Defenders feels very strongly that something needs to be done urgently to address the immediate plight of the pronghorn, such steps must clearly be taken only after an opportunity for and consideration of appropriate public input. However, even for actions that may require an additional, more detailed NEPA process before they are implemented, it is impossible to evaluate the entire plan for pronghorn protection and management on the Range, including relevant cumulative and indirect impacts, without at least some picture of what the plan is envisioning actually doing. This picture is lacking in the present DEIS. 2.47 11.1 11.14

In addition to the comments detailed above, Defenders reiterates the following comments regarding measures aimed at pronghorn protection that should be taken and included in the BMGR INRMP/DEIS.

First, the military agencies must fully implement all conservation measures, reasonable and prudent measures, and terms and conditions contained in the various BOs for the pronghorn, and must also fulfill their obligations in connection with the Recovery Plan. These measures are an integral component of Range resource management, and must be incorporated into the INRMP/DEIS and embodied in the plan. Further, the plan should make clear that all military and other activities on the Range must fully comply with NEPA, the ESA, and other federal and state laws aimed established to protect natural resources. 2.47

Second, we recommend that the agencies reduce roads by the maximum amount proposed in the DEIS (Strategy D), particularly within habitat for the pronghorn, FTHL, and other protected species. There is a large body of scientific literature and research describing the negative biological effects of roads, including direct wildlife mortality, altered animal behavior, degraded habitat, habitat fragmentation, spread of exotic species, and indirect effects associated with increased access to remote areas. Species such as the pronghorn are particularly susceptible to these impacts, and should be protected to the maximum extent possible. 1.7

Third, we strongly urge the agencies to consider designating one or more special natural/interest areas specifically for the purpose of improving pronghorn protection in 9.1

those areas. 9.5

Finally, measures relating to pronghorn management should be fully described, including at a minimum what action will be taken (details), when (timeline/deadline), and how (budgets, other planning processes, implementing agencies). 2.46

Flat-Tailed Horned Lizard

The flat-tailed horned lizard (FTHL) is a wildlife species that the U.S. Fish and Wildlife Service (FWS) has admitted is a ecies of conservation concern. Although the FWS has already lost one round of litigation regarding the listing of this species under the ESA, the FWS nonetheless recently refused to list the species despite admitted implementation problems with the species' Rangewide Management Strategy (1997). Habitat loss and degradation are among this species' greatest threats. In particular, roads and motorized vehicle use are well-known threats to the lizard.

The DEIS states that "[t]he BMGR is considered by some experts to be the most protected portion of the range of [the flat-tailed horned lizard] and the most important part of this species' range in the United States" (DEIS at 4-177), "making it extremely important to the long-term persistence of this species" (DEIS at 4-104). Moreover, the DEIS also highlights the FTHL experience as a good example of management practices that have prevented, or will likely prevent, "unnecessary conflicts between protected species and the military mission" (DEIS at 4-190). For these reasons, it is clear that the agencies can and should make FTHL protection a high priority in development and implementation of the INRMP.

Not only does it appear that DoD has failed to implement habitat measures under the 1997 Management Strategy, but there also appear to be disconnects between the DEIS and the Rangewide Strategy as to how DoD will ensure this species' conservation and viability on the BMGR, and particularly in the FTHL management area. Current provisions mentioned in the DEIS include, among others: mitigation or compensation for projects that damage lizard habitat, limiting vehicle use to designated roads, and steps aimed at ensuring continued lizard movement across the border. What concrete steps have been taken in this regard, and what other steps are under consideration? In addition to simply redesignating the FTHL Habitat Management Area (HMA) as a special natural/interest area under the INRMP, DoD must implement concrete measures to ensure that the species and its vital habitat on the BMGR are adequately protected. 2.62

We also very strongly oppose the proposal to turn over a portion of the BMGR for construction and use of the Yuma Area Service Highway. This proposed roadway would contribute nothing to the BMGR's military training mission, while causing significant damage to FTHL habitat and effectively separating the lizard population on the Range from the species' 12.1

remaining habitat to the west.

Bats

We strongly support the DoD's past inventory old mines and installation of bat friendly gates to prevent disturbance to bat roosting habitat. We also support the proposed action's prohibition of recreational entry to mine sites to protect bat species. 2.55 5.1

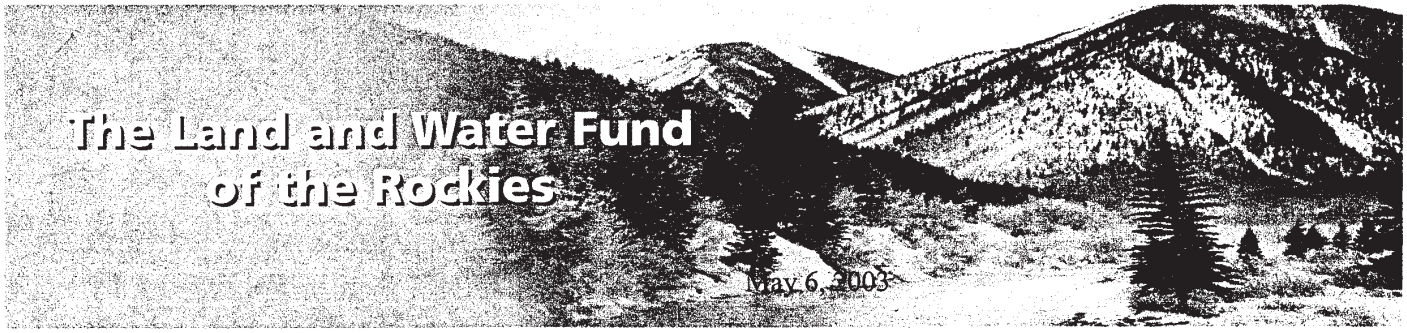
Conclusions

There are a number of positive elements to the DEIS/INRMP, which will benefit wildlife and help protect the fragile Sonoran desert ecosystem, while retaining the ability of the DoD to continue its military training purposes. Provisions to close washes and unused and unneeded roads to vehicle traffic, to prohibit off road vehicle traffic, to manage large roadless areas, and placing restrictions on camping and other recreational uses will all reduce resource damage. On the whole, however, we are very concerned that this plan contains no details regarding monitoring plans, time lines, budgets, or clearly stated goals. Considering the enormous potential damage from both legal and illegal uses of the range and the lack of funding and staff, as well as the failure of this draft to clearly outline specific management goals, time lines or any meaningful cumulative analysis, Alternative D is the only reasonable, prudent, and sustainable option in this plan. At the same time, concrete steps must be taken to further develop and describe the specific goals and actions being developed under this plan, to provide timelines and budgetary support for completion of these measures, and to ensure that the public has an adequate opportunity for further input before final decisions are made. 1.2 1.10 1.11 1.21 7.4 11.1 11.9 11.13 11.16

Thank you for the opportunity to comment on the DEIS/INRMP for BMGR.

Sincerely,

Rennie Anderson
Noah Matson
Jenny Neeley



CORRECTED VERSION

Beth Defend
Barry M. Goldwater Range INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

RE: Comments on the Draft Environmental Impact Statement for the Goldwater Range INRMP.

To Whom It May Concern:

The undersigned wish to comment on the Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan ("INRMP-DEIS").

While there are a number of selected issues worthy of admiration in this document, overall, we must express our strong disappointment with the INRMP-DEIS. Given the breadth of the background materials developed over the last two decades and the input that numerous organizations and individuals have provided during development of this effort, this document suffers from some astounding gaps. As detailed below, our general impression is that this voluminous document details a litany of background facts about the Range without providing much in the way of a forward-thinking, enforceable plan for the future of the Range. Put another way, while this DEIS includes many detailed analyses of current conditions and anticipated impacts, it is startlingly incomplete insofar as it provides just the barest outline of what the actual final plan might contain. It is, essentially, a plan to write a final plan. As such, the INRMP-DEIS includes little actual substance to which we can respond directly. 11.2

While we applaud the Agencies for considering SOME of the recommendations in our extensive comments of November 2000, numerous other recommendations and concerns raised therein were ignored by the lead and cooperating agencies in this DEIS effort. The absence of firm implementation timelines, adequate enforcement measure, among other problems, are particularly troubling. As such, we resubmit and incorporate by reference herein, our November 2000 comments. Attached hereto as Exhibit 1. We urge the Agencies to address and consider the points raised in these incorporated comments as well as those detailed below. 11.29

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The Military Lands Withdrawal Act ("MLWA") of 1999 explicitly directed preparation of an INRMP that shall "include provisions for proper management and protection of the natural and cultural resources, and for sustainable use by the public of such resources to the extent consistent with the military purposes for which the lands are withdrawn and reserved." Pub.L. 106-65, § 3031(b)(3)(E)(i). The Sikes Act mandates that an INRMP shall provide for "establishment of specific natural resource management goals and objectives and time frames for proposed action." 16 U.S.C. § 670b(1)(E).

I. The DEIS Fails to Satisfy NEPA, By Impermissibly Delaying Public Disclosure of Actual Plan Standards and Timelines Until the Final Plan/FEIS Stage.

The resource management goals presented in Table 3-1 of the DEIS are admirable, as far as they go, but, in many cases, this Table sets for items that are not goals for management so much as goals for preparation of the INRMP. For example, the goal for special natural/interest areas is to "review" and "assess the continuing applicability of special management provisions for the protection of these areas," which is something that should be accomplished through the preparation of the INRMP. Once those assessments are completed and decisions made as part of the completed INRMP, the goal should be to manage the resulting special areas for the special values they contain. Most of the other stated goals display similar confusion of goals for the INRMP-preparation process with goals for management of the Goldwater Range. The latter is what must be embodied in a document of this kind.

It is with great concern that we note that this document has only brief descriptions of management prescriptions, and contains no schedules or deadlines for activities. It states that they "will be identified in the final INRMP document." INRMP-DEIS, at 1-35. If this DEIS and any subsequent FEIS are to comply with NEPA, as the DEIS recognizes the Agencies must *throughout* the document, such a delay in enumerating the schedules and deadlines for various management efforts ***is not permissible***. 11.1

As numerous federal court decisions note, the time for NEPA planning is at the draft stage, not at the FINAL stage. This is the case because NEPA's analysis and disclosure requirements serve two primary purposes: (1) it ensures "that the agency . . . will have available, and will carefully consider, detailed information concerning significant environmental impacts"; and (2) "***it also guarantees that the relevant information will be made available to the larger [public] audience***." Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 349, 109 S.Ct. 1835, 1845, 104 L.Ed.2d 351 (1989) (emphasis added). NEPA emphasizes the importance of coherent and comprehensive up-front environmental analysis to ensure informed decision making to the end that "the agency will not act on incomplete information, only to regret its decision after it is too late to correct." Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 371, 109 S.Ct. 1851, 104 L.Ed.2d 377 (1989); see also Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1216 (9th Cir. 1998).

This DEIS is woefully insufficient in meeting these statutory goals, an egregious failing in light of the fact that this Plan will drive Range management decisions for the next 22 years.

The agencies' failure to disclose the substantive aspects of its plan for the future management of the Range fails to demonstrate that the agencies have "considered detailed information concerning significant environmental impacts" and, perhaps most importantly, fails to provide the public with "the relevant information" that individuals and organizations need in order to offer meaningful comments on this DEIS. As such, absent disclosure of actual concrete plan standards in the DEIS, this document violates NEPA. 11.1

II. The DEIS Fails to Disclose Adequate Monitoring Commitments, Fails to Consider the Monitoring Objectives Recommended by Reputable Scientists, Fails to Acknowledge the Value of Monitoring for Ecosystem Health and Fails to Consider the Benefits of Monitoring Across Social Boundaries, As NEPA Requires.

We appreciate the principles of monitoring and adaptive management described in this document (INRMP-DEIS, at 2-72 to 2-74), but find the list of "Resource Monitoring Alternative Management Strategies" (INRMP-DEIS, at 3-15) to be an inadequate description of an actual monitoring program for the Range. Simply put, adaptive management is not a substitute for a detailed and enforceable monitoring plan. INRMPs are, by definition, documents that set firm parameters for future management actions, such as monitoring. The DEIS's failure to do so, based on the claim that it will establish these standards at some undefined time in the future, disregards the NEPA's emphasis on planning aforethought and public disclosure. 13.1

The DEIS also fails to consider and address the work of credible scientists with regard to Range monitoring standards. Specifically, in preparing this DEIS, the Agencies had access to information from scientific experts on this region about the needs and opportunities for ecosystem management of the Goldwater Range that had been compiled by The Nature Conservancy. See Hall *et al.* 2001 (hereinafter "TNC Report"). The TNC Report included detailed descriptions of species and communities that should be monitored, objectives for the monitoring of each of these species, and desired future conditions against which to measure monitoring results. While some of those descriptions were incorporated into the discussion of the affected Range environment, the Report's aforementioned monitoring objectives were not incorporated either explicitly or by reference. The DEIS' failure to incorporate these monitoring objectives gives us and other members of the public little basis against which to evaluate and comment upon the proposed monitoring component of the draft INRMP. 13.2

Furthermore, the agencies' failure to explain why it chose to disregard the opinions of credible scientists that are embodied in the TNC Report violates NEPA. NEPA's mandate with regard to scientific information is clear. In reviewing a challenge to the adequacy of an EA/EIS, the Agency and/or court's challenge is not the "second-guess the experts" in policy matters. Rather, it is to determine "whether the statement is a good faith, objective, and reasonable presentation of the subject areas mandated by NEPA." Manygoats v. Kleppe, 558 F.2d 556, 560 (10th Cir. 1977); see also Save Out Invaluable Land (SOIL), Inc. v. Needham, 542 F.2d 539, 542-43 (10th Cir. 1976) (explaining "an EIS is to be tested by the concepts of 'good faith' and a 'reasonable' discussion of the five mandated areas of subject matter"). Also, a "court should 'ensure that the [EIS] contains sufficient discussion of the relevant issues and opposing

viewpoints to enable the decisionmaker to take a "hard look" at environmental factors, and to make a reasoned decision." All Indian Pueblo Council, 975 F.2d at 1445 (quoting Izaak Walton League of American v. Marsh, 655 F.2d 346, 371 (D.C. Cir. 1981) (emphasis added). Finally, "NEPA requires that an agency charged with preparing an [EIS] take a 'hard look' at the environmental consequences of the project, and that it discloses the risks, present the alternatives, and respond with reasoned analysis to the opinions of reputable scientists concerning the hazards." Kleppe v. Sierra Club, 427 U.S. 390, 410 n.21 (1976) (emphasis added). These legal standards have not been met with regard to numerous conclusions in the DEIS, including the failure to consider the recommendations in the TNC Report, failure to acknowledge the controversial and unproven nature of artificial water developments, and many other issues. We urge the Agencies to keep these standards in mind and to heed them when revising the DEIS or completing the FEIS. 13.2 2.13

In addition, the DEIS describes a separation between monitoring for ecosystem health and monitoring for narrow impact or compliance issues, with the implicit assumption that the latter is more critical. See INRMP-DEIS, at 2-72. This establishes a false distinction by ignoring the vital role that ecosystem monitoring plays in preventing future problems and guiding management on a much broader scale. This fundamental misstatement must be revised in the FEIS. 13.4 13.6

Another thing missing from the DEIS is a clear sense of plans for coordination with adjacent land managers (i.e., National Park Service, Fish & Wildlife Service, Tohono O'odham Nation, IMADES) on inventory and monitoring efforts. The need for coordinated management across boundaries in this region has been pointed out repeatedly over the years (see, e.g., Cornelius 1998; Cornelius *et al.* 2000), so its apparent absence from this document is very disappointing. The agencies' rationale behind this baseless and unjustifiable failure to recognize the benefits of and need for coordinated transboundary management must be disclosed and explained in the FEIS. 11.23 13.5

III. Special Management Areas.

In principle, we support the redesignation of the pre-existing Areas of Environmental Concern ("ACEC") and the Flat-tailed Horned Lizard Habitat Management Area ("HMA") as Special Natural/Interest Areas. However, such designations are meaningless without specific management guidelines. Disappointingly, the DEIS fails to establish any actual standards for managing Special Natural/Interest Areas. Given that the existing three ACECs and one HMA had very specific guidelines, this redesignation represents is a significant step backwards in terms of the protection these areas are likely to receive. 9.4

The MLWA of 1999 directed that the INRMP "incorporate any existing management plans pertaining to the lands withdrawn and reserved by this title, to the extent that the Secretary of the Navy, the Secretary of the Air Force and the Secretary of the Interior, upon reviewing any such plans, mutually determine that incorporation into a plan pursuant to this section is appropriate." Pub.L. 106-65, § 3031(b)(3)(E)(viii). Assuming that positive determination, it

seems that the management guidance of those four existing protected areas should be adopted as the minimum set of guidance for the new designations.

For the ACECs, these standards include: limiting military ground operations to designated roads or existing use areas, limiting all other vehicle use to designated roads, reclaiming non-essential military training areas, and prohibiting woodcutting and removal of dead or downed wood. See BLM 1990, at 20-27. 9.4

For the Flat-tailed Horned Lizard HMA, these standards include: mitigation or compensation for projects that damage lizard habitat, limiting vehicle use to designated roads, and working with immigration control authorities to ensure continued movement of lizards across the international border. See Foreman 1997, at 34-43. Additional guidelines on military activities were provided in a 1996 Biological Opinion. See FWS 1996, at 15-19.

Besides these redesignations, the INRMP should also confer similar status on the Sentinel Plain, subject to similar firm guidance. The Sentinel Plain should be designated and subject to management guidelines similar to those applied to the former ACECs, notwithstanding its previous designation as a special recreation area. Even that designation included restrictions limiting vehicle use to designated roads. See BLM 1990, at 28. The Sentinel Plain area contains the largest lava flow in southern Arizona and an unusual vegetation community, for which it was recommended to be designated a special natural area by The Nature Conservancy. See Hall *et al.* 2001, at 11-17. The revised DEIS or FEIS should integrate these common sense parameters. 9.3

IV. Motorized Access.

One of the topics in this planning process that got significant attention was the road network and related motorized access issues.

The undersigned strongly support the continued closure of the Goldwater Range to off-road driving. This is critical to maintaining healthy wildlife and plant communities across the Range, and to minimizing accidental or deliberate damage to archeological sites. In keeping with this, we are outraged by the DEIS' suggestion that the agencies would so much as consider allowing public recreational off-road vehicle travel on the Range. INRMP-DEIS, Strategy B, at 3-17. Importantly, there have been many careful and reputable scientific evaluations of the effects of such use, and the experts have reached a virtually unanimous conclusion – that off-road vehicle use causes extensive short- and long-term damage to natural resources which is difficult to restore. See generally Zukoski 2000, and id., at Exhibit 3 (a reference list of these scholarly articles). This kind of use is not and cannot be seen as a "sustainable" use, as required under the Sikes Act (16 U.S.C. § 670a(b)(1)(F)). Given the well-established understanding of its detrimental environmental and cultural effects, recreational off-road driving was prohibited by the LAFR Plan (Tunnicliff *et al.* 1986, at 11-15) and the Goldwater Amendment (BLM 1990, at 15), as it should be in this plan as well. 1.21

We strongly agree with the DEIS's stated prohibition against driving in washes unless they are part of the inventoried road system. Under no circumstances the Range allow unrestricted driving in washes. In this arid ecosystem, washes are among the most important areas for plants and wildlife on the Range. Motorized vehicle use in washes causes direct harm to wildlife and long-term degradation of their habitat. This is particularly true of vehicle use at the fragile ingress and egress points of washes. Notably, the Range's washes are used by species ranging from resting deer to nesting birds. Driving in washes further contributes to environmental degradation by exacerbating soil erosion and contributing to loss of bank habitat for plants and wildlife, such as desert tortoises, quail, pronghorn, and deer. 1.2

If driving in washes is permitted, washes would effectively become part of the Range's road network. Brief examination of a topographic map of the Range reveals that virtually the entire Range is accessible via washes. As such, one could reasonably expect to find visitors camping and driving anywhere on the Range, including within dangerous live-fire and restricted areas.

Troubling, the Draft Plan fails to indicate that the Agencies have made (or plan to make) any attempt to inventory existing washes within the Range's boundaries. Absent such an inventory, the Agencies cannot claim to have any baseline data necessary to determine the consequences of failing to sign and/or barricade wash entrances to prevent motorized travel within them. Without this data, the Range should not so much as consider including any washes within "the designated road system." DEIS, at S-28. Haphazard vehicle use of some washes, could foreseeably lead to the damaging proliferation of damaging, redundant roads on the Range. 1.22

This new use of the Range should not be permitted in any way, shape, or form. However, as this illegal use of non-designated washes could foreseeably impact more washes, the revised DEIS or FEIS must include baseline data regarding existing washes and address how expanded use of these washes could impact the Range environment.

This prohibition against vehicle use in washes should apply with equal force to Border Patrol activities. Regular Boulder Patrol sorties into and through washes to search out tracks does not qualify as an emergency, life-saving mission, and causes the same damage as recreational driving in washes. 7.3

Given our strong support for fewer roads within the Range, , we support Alternative Strategy D insofar as this Alternative closes several hundred miles of roads. See INRMP-DEIS, at 3-29. Over the last 25 years there has been an enormous increase in the number and miles of roads on the Range, many of which are completely redundant. Most of these roads are not historic, but, instead, were created by illegal use within the last 15 years, without official planning or approval, without monitoring, and without NEPA study or discussion. 1.7 1.28

Specifically, those roads that damage or threaten sensitive plant, wildlife, cultural, or scenic areas must be closed. As examples, spaghetti bowls of roads now exist around popular visitor locations like Dripping Springs and Tinajas Altas. The excessive numbers and lengths of roads have seriously damaged the natural and cultural resources of these locations. The 1.10 1.28

Agencies must consider closing roads in these areas and others like it in its revised DEIS or FEIS. 1.10 1.28

The Plan should also include further forward-looking directives regarding the rehabilitation of additional unneeded roads and damaged areas. It should further limit driving to roads that are signed "open," in addition to the DEIS's current prohibitions against vehicle use of those that are signed "closed." 1.9 1.10 1.13

We support the concept of closing roads to increase the size of roadless areas. We appreciate the fact that large roadless areas still exist on the Goldwater Range and emphasize that they are critically important to habitat health. Importantly, certain wildlife species derive great benefits from these large roadless areas. These species include, but are not limited to Sonoran pronghorn, desert bighorn sheep, and mountain lion, all of which are species of concern on the Goldwater Range. In addition, it is important for this Plan to recognize that the wilderness qualities of large, roadless areas are important for a large proportion of recreational users. A detailed explanation of the biological values of roadless areas and strategies to maintain them on the Goldwater Range was presented to the Agencies several years ago and this rationale still holds true today. See Zukoski 2000. 1.9 1.10 1.11

With reluctance, we support the creation of a new bypass road around the northwest corner of Cabeza Prieta National Wildlife Refuge, in order to protect the integrity of the designated Wilderness area located in that portion of these Refuge. We offer this support contingent upon the Agencies' including a commitment to promptly close and restore the existing road in writing in any revised DEIS or FEIS. Should the Agencies fail to commit to this closure and restoration in future NEPA documentation, any new bypass road will merely exacerbate and further contribute to the deliberate proliferation of redundant roads. 1.27

We strongly oppose turning over a portion of the Goldwater Range for construction and use of the Yuma Area Service Highway. That roadway contributes nothing to the military training mission of the Range. It would also cause significant damage to Flat-tailed horned lizard habitat, and effectively separate the lizard population within the Goldwater Range from the remaining habitat lying to the west. 2.51 12.1

V. Wildlife and Vegetation.

We appreciate the DEIS's detailed discussion of wildlife and vegetation issues, and its listing of gaps in the available information on these subjects. However, we note with concern that few of those identified gaps appear again as management strategies to be pursued during the life of the Plan. For instance, the DEIS describes the need to conduct inventories of occurrence and distribution of reptile and invertebrate species. See INRMP-DEIS, at 4-139. Troublingly, these identified needs did not get translated into concrete written strategies for conducting such inventories. Information on the occurrence and distribution of species is basic to ecosystem management, and may be the most cost-effective approach for identifying broad-scale changes. 2.38

Notably, the DEIS' failure to do more than identify the "gaps" in existing information on this and other relevant issues may violate NEPA, as identifying where information is currently lacking does not meet this statutory and regulatory mandate. To this end, regulations implementing NEPA require the Forest Service to utilize "high quality" information:

> The information [in NEPA review documents] must be of high quality. Accurate scientific analysis . . . [is] essential in implementing NEPA.

40 C.F.R. § 1500.1(b). Regulations issued by the Council on Environmental Quality ("CEQ") further require that

> Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analysis in environmental impact statements. They shall identify methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement.

13.3

40 C.F.R. § 1502.24. Agencies must also ensure that scientific models are reliable, based on "theoretical approaches or research methods generally accepted in the scientific community," and the scientific evidence must be "credible." 40 C.F.R. §§ 1502.22(b)(3) & (4). Notably, the NEPA implementing regulations further **require agencies to develop currently unavailable or incomplete information on environmental impacts which is essential to a reasoned choice among alternatives, unless the cost of obtaining such information is "exorbitant**." 40 C.F.R. § 1502.22; see also Neighbors of Cuddy Mountain v. United States Forest Service, 137 F.3d 1372, 1380 (9th Cir. 1998) (warning that "general statements about 'possible' effects and 'some risk' do not constitute a 'hard look' absent a justification regarding why more definitive information could not be provided").

The undersigned underscore the importance of the DEIS and FEIS following these and other relevant statutory and regulatory standards.

VI. Water Developments.

The science on the effectiveness of water developments is hotly debated, something that reveals this practice for what it remains -- an experimental exercise. Insofar as arguments in favor of these developments are concerned, they rest on a number of unproven assumptions: that additional water maintains or increases populations of some species, that it is benign, and that it adds to the ecosystem. However, before existing, natural tinajas are enhanced, they should be studied for the presence, identity, and role of invertebrates (e.g., subspecies of fairy shrimp). Native Americans must also be consulted.

Waterholes invite public visitation on access roads, leading to disruption of wildlife, vandalism, pollution and depletion of the water, and higher levels of activity in the general area. Also, some sportsmen deplore as poor ethics the practice of "hunting the hole," where hunters wait for wildlife to come drink, only to then ambush them for an easy shot. No hunting should

be allowed within 1/4 mile of these developments, just as no camping is allowed within 1/4 mile of them. 2.23

The DEIS chose to ignore the fact that no published study shows a predictable increase in wildlife after a water catchment is built. This failure to acknowledge the dearth of science on this subject arguably constitutes a violation of NEPA. 2.13

The DEIS repeats the apparently unsupported assumption that game animals historically moved to the Gila or Sonoyta rivers in times of drought. The Plan should either provide historic corroboration for this position or identify it for what it is, a myth and a mere assumption. Similarly, some argue that supplemental water is needed because natural springs have dried up, rich grasslands have disappeared, or because predator populations have grown out of proportion. Again, if there is any historic evidence supporting these assumptions, it should be included in the Plan. If such evidence does not exist, the revised DEIS or FEIS must disregard these arguments, as they amount to no more than ad hoc suppositions advanced in support of an agency position. 2.21

At a minimum, current and future water development should abide by the Arizona Game and Fish Department ("AGFD") standards set forth in its 1997 Report entitled "Wildlife Water Developments in Arizona: A Technical Review." This Report expressly identified the following recommended course of action with regard to these water developments:

> we recommend 3 specific courses of action: 1) an expansion of the water development planning process, 2) implementation of a statewide water development monitoring and evaluation program, and 3) new research to address outstanding questions concerning the ecological effects of water developments.

Id. at 50-51.

The AGFD's 1997 Report continues on to state that planning should be site-specific and subject to the following elements: 2.22

> (1) Biological purpose, need, and specific objectives for the project, including an assessment of existing water sources within the project area;
> (2) A list of key species expected to benefit from the proposed development;
> (3) A review of past population performance of key species in the project area and expected benefits of the project to these species;
> (4) A list of other wildlife species that may also benefit from the proposed development;
> (5) An assessment of potential impacts from the development;
> (6) An evaluation of alterative actions (i.e., different designs, locations, etc.) that address the defined purpose, need, and objectives, as well as a "no-action" alternative; and,

(7) Specific monitoring criteria that can be used to evaluate the efficacy of the project after completion.

Id.

To date, these recommended actions have not been undertaken for either existing or proposed catchments on the Goldwater Range. However, as per the AGFD's *own recommendations*, this information should be included in the revised DEIS or FEIS and Plan for the Range, and there should be a full and public discussion process before more catchments are built. Should the Agencies decide to disregard the express recommendations of a cooperating agency such as the AGFD, the revised DEIS or FEIS must disclose and explain why such a decision was reached with regard to water catchments. We caution the Agencies that such a decision would likely be viewed as arbitrary and capricious. 2.22

Moreover, the 1997 AGFD Report describes monitoring and evaluation procedures, which either are not being done or are not reported in the Draft Plan. The AGFD Report suggests "site-specific evaluations be performed at a specified [regular] interval, to decide if developments should be maintained, in their existing state, enhanced, or removed." Id. at p. 52. The Draft Plan, however, contains none of the information to evaluate whether catchments should be maintained, enhanced, or removed. Again, this deficiency should be remedied in any revised DEIS or FEIS or, at a minimum explained.

We recommend a ten-year moratorium on water developments until existing catchments can be appropriately monitored over time, studies can be done to prove their efficacy, understanding can be gained as to their effects on target and non-target species, their cost-effectiveness can be analyzed, and baseline wildlife population information gathered on particular sites. This period can also be used to evaluate existing game waters in order to determine, on a case-by-case, if these catchments should be retained, modified, or removed. 2.19

The DEIS includes several additional errors in its discussion of wildlife use of water developments. The discussion of herpetofauna specifically mentions use of stock tanks by wandering garter snakes and frogs in the family Ranidae. See INRMP-DEIS, at 4-144. Neither that snake species (*Thamnophis elegans vagrans*) nor any ranid frog is known to occur on the Goldwater Range, so their mention is irrelevant and should be stricken from any revised NEPA document. 2.11

VII. Recreation Management.

As is true of the DEIS's discussion of wildlife management, the undersigned appreciate the Agencies' efforts to identify and list gaps in the available information. However, we once again note that few of those identified gaps appear again as management strategies to be pursued pursuant to the Plan. For instance, the described needs for current data on recreation use is only addressed tangentially, and lack of data on hunting activity levels did not get translated to any strategies. See INRMP-DEIS, at 4-278. 5.9 13.3

Furthermore, the undersigned believe that visitor permits should continue to include an educational component, in the interest of encouraging visitors to maintain Range resources. Special permits to visit areas that are ordinarily off-limits should also be governed by an open process, one that is implemented without favoritism and announced to the general public. 5.6

Finally, we note that geocaching, vehicle racing, large groups, survivalist activities, militia training, and similar activities have no place on this military range. These issues should be addressed in any revised DEIS or FEIS. 1.21 5.7

VIII. Target Shooting.

In the past, groups of target shooters have disrupted military training with wild displays of night firing that included the use of machine guns, tracers, fireworks, flares, and blind shots directed at distant mountain slopes. Targets frequently consist of glass bottles and clay pigeons, which remain behind on the Range as litter. Public target shooting, especially that involving the use of automatic weapons, has no place on the Goldwater Range. Importantly, not even the military trains on the Range with small arms. 6.1

Target shooting, day or night, can do no good for wildlife, cultural resources, or the safety of range workers, law agents, illegal entrants, or military personnel. When one considers the number of people crossing the Range without permits, in conjunction with the fact that many of these folks have no clue as to the Range's myriad dangers, public target shooting on the Range is a recipe for disaster. We caution the Agencies that as little as one incident on the Range, involving either a target shooter or a training exercise, could spark national and international protests of the kind that led to the closure of the military range on Vieques Island, once an important training range. 2.26

Target shooting is appropriate at a designated range, where shots can be scored, brass picked up, targets retrieved, and ground secured for the safety of other public users. Yuma Proving Ground or Chocolate Mountain Range might be appropriate places, as would the Marine base at Yuma. The safety considerations relevant to any decisions to permit target shooting on the Range should be disclosed and considered in any future NEPA documentation.

IX. Cultural Resources.

Although we are aware that a draft Integrated Cultural Resource Management Plan ("ICRMP") was completed about a year ago, to the best of our knowledge, it has yet to be made available for public review and comment. The cultural resources of the Goldwater Range are among its most significant features as well as, in some cases, its most popular tourist destinations. They have received only token protection in the past with documentation efforts largely limited to the target ranges and a portion of what was formerly known as Area A. On the 14.1

western side of the Range only Tinajas Altas has been documented with any degree of thoroughness.

We believe that the inventory and protection of the cultural resources of the Goldwater Range are of paramount importance. Much has been lost in recent decades and, with the enormous increase of public visitation, we can expect much greater losses in the near future.

Thus, we believe it is critical that the ICRMP be a strong document, with a carefully thought out management strategy and budget so as to guarantee the protection of the Range's cultural and environmental resources. In addition, the two planning documents (the INRMP and the ICRMP) must be compatible and have a clear working relationship. Ideally, the public comment period for the two plans should run simultaneously. It is difficult if not impossible to understand how the natural and cultural resources of the area can be protected and managed separately, one apart from the other. 14.1

It is our understanding that the Air Education and Training Command is reviewing the draft cultural resource plan and has concluded that a management action plan is necessary to guide the budget. We strongly suggest that a similar management action plan be prepared to guide the budget of the INRMP, since budget details are largely lacking in the DEIS upon which we are presently commenting. 11.1 11.22

X. Plan Enforcement.

The Plan does not spell out the role that the military will play in enforcing Range policies. What can and will Range staff enforce? What criminal and environmental laws govern these enforcement efforts? Other local, state, federal laws? Pursuant to what authority are they applied? Do Congress and the public have a reasonable expectation that the military will live up to its responsibility to enforce the laws and policies? These basic issues must be identified in any revised or final NEPA documentation. 8.3

XI. Budget.

The Plan is sorely lacking any firm, written commitment insofar as staffing and budget issues are concerned. The Plan must include the Five-year Defense Plan budget if the public is to have any faith in the military's commitment to good stewardship of these Range lands. What is an adequate staff? A feasible budget? What monies and staff do and will other agencies contribute to this Plan implementation and enforcement effort? Without these numbers and contracts, long-range planning, monitoring, and protection are doomed to failure. As such, it is imperative that any revised or final NEPA documentation address these issues. 11.22

XII. Accountability.

At five-year intervals, the military is required to report to Congress concerning the health of the Range. However, five years can be a very long time when diverse interests are at issue – for example, some parts of the Range lie in areas beyond the realm of public observation, some members of the military would like to dispense with environmental regulations and ecological practices on the Range, and increasing public visitation is likely to have profound effects on the Range. We recommend that the Plan provide for an ombudsman, a public range review board, and periodic tours of closed Range areas so that the public can watch, evaluate, and recommend improvements to Range management. The health and the existence of the Range are at stake, and this land belongs to the American people. 11.21

XIII. Conclusion.

Given the DEIS's failure to address a wide range of important issues, it is difficult for the undersigned to wholeheartedly support any of the management alternatives. Having said that, by and large, Alternative D is the most reasonable, prudent, and sustainable option outlined in this draft Plan. We support Alternative D and encourage you to expand it with the explicit details needed to make this a functional plan. 11.9

Sincerely,

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EXHIBITS

Exhibit 1. Outline For a Conservation Management Plan for the Barry M. Goldwater Range Integrated Natural Resources Management Plan, submitted by Edward B. Zukoski on behalf of Friends of Cabeza Prieta, Land and Water Fund of the Rockies, Southwest Forest Alliance, and The Wilderness Society, Dec. 2000.

REFERENCES

Bureau of Land Management. 1990. Lower Gila South Resource Management Plan (Goldwater Amendment). Final. U.S. Department of the Interior, Bureau of Land Management, Phoenix District Office, Arizona.

Cornelius, S. 1998. Fragmentation of Natural Resource Management in the Sonoran Desert: Issues and Resolutions. The Sonoran Institute, Tucson.

Cornelius, S.E., G. Acheson, W.L. Halvorson, B. Miller, V. Morrill, M. Taylor, D. Tiller, and B. Wellman. 2000. Building the Case For Ecosystem Monitoring in the Sonoran Desert. Pp. 21-22 in W.L. Halvorson and B.S. Gebow (eds.), Creative Cooperation in Resource Management: Third Conference on Research and Resource Management in the Southwestern Deserts. Extended abstracts. U.S. Geological Survey, Sonoran Desert Field Station, University of Arizona, Tucson.

Foreman, L.D. 1997. Flat-tailed Horned Lizard Rangewide Management Strategy.

Hall, J.A., P.A. Comer, A. Gondor, R. Marshall, and S. Weinstein. 2001. Conservation Elements of and a Biodiversity Management Framework for the Barry M. Goldwater Range, Arizona. The Nature Conservancy of Arizona, Tucson.

Tunnicliff, B. *et al.* 1986. Natural Resources Management Plan for Luke Air Force Range. Prepared for the United States Air Force – Tactical Air Command, Luke Air Force Base, Arizona.

Zukoski, T. 2000. Outline For a Conservation Management Plan for the Barry M. Goldwater Range Integrated Natural Resources Management Plan. Submitted on behalf of Friends of Cabeza Prieta, Land and Water Fund of the Rockies, Southwest Forest Alliance, and The Wilderness Society.

EXHIBIT 1

INTRODUCTION

The Barry M. Goldwater Range (BMGR) is located in the heart of the Sonoran desert, and contains one of the most undisturbed desert ecosystems in North America. It is part of a network of potentially protected lands stretching from the outskirts of Tucson and Phoenix to the Gulf of California. It contains hundreds of thousands of acres of roadless lands, habitat for one of the most endangered mammals in North America (the Sonoran pronghorn antelope), hundreds of other species of wildlife, and numerous, diverse plant communities well adapted to this forbidding climate. The Pinacate/Organ Pipe/Goldwater complex contains the largest number of conservation targets (including representative ecological communities and species) of any other conservation site identified by The Nature Conservancy in the Sonoran Desert.[1] The area also contains numerous important pre-historic and historic cultural sites.

The natural and cultural resources of this area deserve the highest levels of stewardship, protection, and conservation.

The Integrated Natural Resources Management Plan (INRMP) required by the Sikes Act and the Military Lands Withdrawal Act of 1999 (PL 106-65) provides the US Air Force and the US Marine Corps with the opportunity to ensure that the BMGR's natural and cultural resources are protected, conserved, and where necessary restored. For this reason, a number of conservation groups, including the Land and Water Fund, have developed this outline for a "Conservation Management Plan" (CMP) for the BMGR which we believe will best protect these resources while ensuring that the Range's military mission can be accomplished.

On behalf of the The Wilderness Society, Land & Water Fund, and Friends of Cabeza Prieta, and Southwest Forest Alliance, we request that the US Air Force (USAF) and US Marine Corps (USMC) specifically analyze a CMP based on this outline as a "reasonable alternative" in its analysis of potential management plans for the BMGR's natural and cultural resources.

This document is necessarily an "outline," and not a full-fledged alternative, because much of the information needed to complete a comprehensive CMP is still being developed by the BMGR, and because the groups sponsoring this report cannot replicate the resources DOD has to develop a full alternative. However, staff and volunteers of sponsors of this CMP outline stand ready to assist DOD staff in fleshing out a full alternative.

Please note that joint comments on scoping, submitted by The Wilderness Society, Defenders of Wildlife, Friends of Cabeza Prieta, and the Southwest Forest Alliance on August 28, 2000, contained many -- but not all -- of these recommendations.

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[1] Marshall, R.M., et al. (2000). *An Ecological Analysis of Conservation Priorities of the Sonoran Desert Ecoregion*. Prepared by The Nature Conservancy Arizona Chapter, Sonoran Institute, and Instituto del Medio Ambiente y el Desarrolla Sustentable del Estado de Sonora with support from the Department of Defense Legacy Program, Agency and Institutional partners. 146 pp.

LEGAL FRAMEWORK

There are several applicable laws and DOD policies relating to the development of the INRMP and this CMP outline. Perhaps the two most important are the Sikes Act (16 U.S.C. § 670a), and the Military Lands Withdrawal Act (MLWA) of 1999.

In managing military lands, the Sikes Act emphasizes fish and wildlife protection ***over other aspects of natural resource use and protection***. See 16 U.S.C. § 670a(b)(1)(F) (permitting "sustainable use by the public of natural resources ***to the extent that the use is not inconsistent with the needs of fish and wildlife resources***") (emphasis added). The Endangered Species Act places additional requirements for land management where federally listed threatened and endangered species occur. Clearly, the priority of DOD lands, including BMGR, is to maintain and enhance military preparedness which is an appropriate goal for these lands. However, the Sikes Act does not expressly provide that military needs take precedent over natural resource management and protection, but rather demands "no net loss in the capability of military installation lands to support the military mission." 16 U.S.C. § 670(b)(1)(I).

The Sikes Act requires that the INRMP "establish specific natural resource management goals and objectives and time frames for proposed action." 16 U.S.C. § 670a(b)(1)(E). We believe this is of critical importance for the BMGR plan. Setting such goals and timelines will ensure that the BMGR can be held accountable for achieving concrete goals by a date certain. We have attempted, where possible, to suggest deadlines and goals for standards that we urge for inclusion in the INRMP. This is one of the critical elements of the plan.

The MLWA of 1999 contains many requirements similar to those in the Sikes Act concerning the content of INRMPs. The MLWA also permits the BMGR to "incorporate any existing management plans pertaining" to the Range into the INRMP. MLWA of 1999, Sec. 3031(b)(3)(E)(viii). In general, however, we urge the DOD ***not*** to incorporate previously adopted plans, except where we make recommendation with regard to specific provisions. On the whole, the Bureau of Land Management's (BLM's) Goldwater Amendment and several Habitat Management Plans for the Range were based on poor data and assumptions, and failed to adequately protect wildlife and habitat resources. The resource damage that has occurred at Tinajas Altas in recent years is particularly telling as to the inadequacy of the plans, and of the failure of the agencies charged with enforcing them. Perhaps the Goldwater Amendment's greatest flaw was its failure to set concrete goals and standards, and, where it did set such goals, its failure to provide a timeline for accomplishing them. In sum, DOD cannot simply adopt these previous, flawed management plans in their entirety, since they will not allow the agency to properly discharge its duties under the Sikes Act. This CMP attempts to remedy many of the failings of the previous plans.

Finally, DOD has adopted at least one Instruction Memorandum – No. 4715.3 (May 3, 1996) (hereafter IM 4715.3) – that sets policy and prescribes procedures for the development of INRMPs. Among other things, the Instruction Memorandum describes DOD's duty to manage for the "biological integrity" of DOD lands (Para. 4.2.1), and to "incorporate the principles of ecosystem management" in natural resource management planning. Para. 4.2.2.

SUMMARY

The Conservation Management Plan (CMP) would do the following:

- Protect and Restore Native Biodiversity and Natural Ecological Processes. The CMP would be guided by the findings of conservation biology. Specifically, management of natural resources should ensure the maintenance, protection, and restoration of all native species and all native plant and animal communities and associations in natural patterns of abundance and distribution. In addition, management of natural resources should ensure the maintenance, protection, and restoration of natural ecological processes.

- Put Natural Resources First. Accomplishing the military mission and meeting the Department of Defense's (DOD's) stewardship responsibilities for natural and cultural resources are the two primary requirements that determine DOD's use and management of the lands and resources of the BMGR under the Sikes Act and MLWA. Other uses of the land and resources, such as providing public recreation, are ***secondary uses*** and must not infringe on natural resource management requirements. DOD must put natural resources first.

- Do No Harm. The CMP would be based on the best scientific information available and follow the principles of an ecosystem approach to management. The INRMP should define what the baseline ecological conditions are on the BMGR, identify any significant data gaps, and outline a plan of action to fill those gaps. Most importantly, where potential impacts of an action are not well understood but could be harmful, DOD should permit no action. Where DOD does not have sufficient funds to monitor and mitigate the impacts of a proposed action, ***it cannot approve the action***.

- Protect Park-Quality Values. Management of the BMGR's natural resources should emphasize the protection, conservation, and restoration of National Park-quality values, including wilderness, natural, and cultural values, and "conservation targets" as identified by The Nature Conservancy's "Ecological Analysis of Conservation Priorities of the Sonoran Desert Ecoregion."

- Protect Roadless Areas. Management of natural resources should reflect the fact that roads and off-route motorized vehicle travel present one of the gravest threats to the preservation of healthy, intact desert ecosystems. Roads and ORVs can and do fragment habitat, cause roadkill, limit wildlife security, disrupt hydrology, and act as vectors for invasive exotic species and poaching, among other damaging impacts. To best protect natural resources, the CMP would prohibit new road construction, extractive uses, vehicular access, the erection of new structures, and damaging military activities in all existing roadless areas greater than 1,000 acres in size. New activities should be limited to the greatest extent possible to already

disturbed areas. Transportation management must emphasize the elimination and restoration of unnecessary, redundant, or damaging routes.

- Ensure Accountability and Enforcement. Plans are meaningless unless they are enforceable and enforced. The best way to make the INRMP enforceable is to adopt clear, measurable standards, and to include specific deadlines for accomplishing specific goals. All uses – including military uses – should be required to meet the Plan's standards. The Conservation Management Plan contains numerous standards designed to protect the BMGR's outstanding natural and cultural values. To ensure that the Plan is implemented, it must be funded sufficiently to ensure that standards, goals, and deadlines are met. To ensure accountability, the Plan must provide for public notification and input before it can be amended.

- Use Monitoring to Better Understand Impacts of Permitted Uses . To understand the impacts of military and other activities that may affect Range resources, the CMP would define the specific objectives of a comprehensive ecological monitoring plan, emphasizing local and regional threats, that will be implemented during the next five years.

We believe that a plan that incorporates these general principles provides the DOD with the best chance that the health of the ecological communities that make up the BMGR will be preserved and restored throughout the 25-year withdrawal.

GENERAL PRINCIPLES GUIDING NATURAL RESOURCE MANAGEMENT PLANNING

I. ***The Plan Must Contain Enforceable Standards.***

The INRMP must include standards and guidelines designed to protect natural resources against which all potential sources of stress -- whether military or other activities -- must be weighed. This is consistent with the Sikes Act's requirement that INRMPs "establish specific natural resource management goals and objectives and time frames for proposed action." 16 U.S.C. § 670a(b)(1)(E); see also IM 4715.3, Enclosure 6, Para. E.6.2.8 ("Accountability measurements are vital to effective ecosystem management. Implementation strategies should include specific and measurable objectives and criteria with which to evaluate activities in the ecosystem."); id., Enclosure 7, para. E7.1.10 ("An INRMP shall ... Establish *requirements, goals, and targets* that can be easily reflected in budget documents and decisionmaking processes, and addressed in conservation self-assessments") (emphasis added). Throughout this CMP outline, we propose a number of potential standards.

Further, DOD must make the INRMP enforceable. No action which violates the standards and guidelines contained in the INRMP should be permitted to go forward. Agencies proposing specific actions must explain how and whether the actions comply with such standards.

We note that other agencies, such as the Forest Service, are required to ensure that all site-specific actions on National Forest lands comply with the applicable management plan. 16 U.S.C. § 1604(i). To facilitate compliance with this provision, the Forest Service completes a "consistency analysis" for each proposed action. BLM regulations contain similar requirements. 43 C.F.R. § 1610.5-3(a).

The INRMP should therefore require the following:

- DOD shall complete *a consistency analysis for ongoing and proposed actions*, whether military or non-military, that may effect natural resources on the BMGR to determine whether the action will comply with the INRMP. Document compliance or noncompliance with each applicable standard in the INRMP for proposed actions in a "consistency analysis" to be made available to the public as an attachment to any document prepared pursuant to NEPA.

- DOD shall bring all ongoing activities into compliance with the INRMP as soon as possible, but in no event later that 1 year.

- DOD shall permit no new activities that may lead to violation of any standard in the INRMP.

Without such requirements, standards and guidelines contained in the INRMP will be little more than recommendations that can be ignored at will and without explanation. Neither DOD guidance nor common sense permit adoption of a vague, meaningless plan.

II. *The Plan Must Only Permit Activities Where Monitoring, Mitigation, and Enforcement Will Occur.*

A parallel requirement to making the plan enforceable is making clear that DOD can permit only those actions where it can ensure that mitigation, monitoring, and enforcement can occur.

Management requires funding, staff and equipment. While the INRMP itself may not automatically trigger the appropriation of funds for all actions proposed therein, the availability (or lack thereof) of funds must guide natural resource planning. DOD policy requires that DOD budgeting must integrate natural resource planning requirements. IM 4715.3, Enclosure 6, Para. E6.2.6.4 states that DOD must "[i]ncorporate ecosystem management goals into strategic, financial, and program planning and design budgets to meet the goals and objectives of the ecosystem management implementation strategy." In addition, DOD guidance requires that military installations "shall within available resources plan, program, and ***budget to achieve, monitor, and maintain compliance*** with all applicable Executive orders and Federal natural and cultural resources statutory and regulatory requirements…." IM 4715.3, Para. 4.1.2.

Therefore, the INRMP should make clear that DOD ***cannot approve any action*** (including a DOD military action) where the agency does not have sufficient funds to: (a) monitor and mitigate the impacts of a proposed action; or (b) enforce compliance with the standards and guidelines of the INRMP, as well as all other applicable laws and regulations. Otherwise, DOD approval of the action could lead to resource damage that may never be remediated or understood. Consistent with DOD guidance, where DOD cannot "budget to achieve, monitor, and maintain compliance" with the INRMP itself, agency actions cannot go forward.

III. *The Plan Must Be Supported By Necessary Infrastructure.*

Management of natural and cultural resources on the BMGR is a huge responsibility for DOD, and a *new one* that DOD has never before attempted. Now that natural resources management responsibilities for the BMGR has been placed firmly on DOD's shoulders with passage of the MLWA of 1999, DOD management will require infrastructure, including funding, and staff for monitoring, planning, enforcement, training, etc. The INRMP must therefore describe and disclose the infrastructure that the MCAS Yuma and Luke AFB will put in place to ensure achieving its goals.

Much of the DOD's work concerning compliance with environmental requirements at BMGR to date has been through contractors. With its new management responsibilities, DOD must fully fund and develop a comprehensive natural resources management division at the BMGR. DOD should also consider putting in place mechanisms to ensure some autonomy for the natural resource management staff. Without some autonomy, natural resource management

staff will not be sufficiently free to ensure that DOD lives up to its new mission responsibilities for natural resources when faced with a perceived conflict with a particular military activity.

IV. *The Plan Must Require the Use of the Best Scientific Information Available and the 'Precautionary Principle.'*

In making decisions that may affect the management of the BMGR's natural resources, the INRMP should require that DOD use the *best scientific information available*, as required by DOD policy and guidance. IM 4715.3, Para. 6.2.1.3. (in ecosystem management, DOD must "[u]se the best available scientific information"); see also id., Enclosure 6, Para. E.6.2.7 ("Rely on the Best Science and Data Available"). NEPA also requires the use of accurate scientific analysis .[2] Management decisions should be based on sound science and not anecdotal information.

If scientific data are lacking, then *before* a management change is made, appropriate scientific data should be collected, analyzed, and incorporated into appropriate decisionmaking processes and management actions. In other words, where potential impacts of an action are not well understood but could be harmful, ***DOD should not permit the action to occur***. This is known as the 'precautionary principle.' This principle should inform all facets of management actions that may affect natural resources on the BMGR.

V. *The Plan Must Be Guided by Principles of Ecosystem Management.*

Natural resources usually ignore jurisdictional boundaries, and sustaining ecosystems implies looking beyond jurisdictional boundaries That is the case on the BMGR. While located in the heart of the Sonoran desert, it is bordered by lands managed by a variety of agencies (including FWS, BLM, Mexico, state of Arizona) as well as private owners.

Thus, in managing natural resources on the BMGR, the DOD should examine the potential for working with adjacent landowners and land managers to protect resources on an ecosystem basis. DOD should examine the possibility of establishing management for wildlife and plant species and communities that coordinates closely with other land managers, particularly where resources or threats transcend boundaries.

For example, invasive exotic species, such as Sahara mustard, are a threat to BMGR lands as well as to adjacent federal lands. The most effective approach will likely be one that is coordinated across boundaries, or at least one where actions by one agency do not conflict with that of another. For that reason, we suggest (below) that DOD spearhead a coordinated,

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[2] Council on Environmental Quality (CEQ) regulations implementing NEPA recognize that intelligent decisionmaking can only derive from high quality information. EAs must provide "evidence and analysis" for their conclusions that doing a FONSI or full EIS is required. 40 C.F.R. § 1508.9. Information included in NEPA documents "must be of high quality. Accurate scientific analysis ... [is] essential to implementing NEPA." 40 C.F.R. § 1500.1(b). Where an agency has outdated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process.

interagency group to monitor invasive exotic species and to establish a plan for addressing the threat.

In addition, DOD personnel have previously suggested BMGR and the Cabeza Prieta NWR could coordinate wildlife management in mountain ranges that occur within both jurisdictions (such as the Mohawk Mountains).

This approach is not only prudent, it is required by DOD guidance. See IM 4715.3, Para. 4.2.2 ("INRMPs shall incorporate the principles of ecosystem management"); Para. 5.2.9.2 (requiring DOD to "identify, participate in, and promote the establishment of regional ecosystem management efforts"); Para. 6.2.1 (defining 'ecosystem management' for purposes of undertaking INRMPs); Enclosure 3, Para. E3.1.12 (defining INRMP as "[a]n integrated plan based, to the maximum extent practicable, on ecosystem management that shows the interrelationships of individual components of natural resources management (e.g., fish and wildlife, forestry, land management, and outdoor recreation) to mission requirements and other land use activities affecting an installation's natural resources"); Enclosure 6 (entitled "Ecosystem Management Principles and Guidelines," and defining ecosystem management as "involv[ing] conducting installation programs and activities in a manner that identifies, maintains, and restores the 'composition, structure, and function of natural communities that comprise ecosystems,' to ensure their sustainability and conservation of biodiveristy at landscape and other relevant ecological scales to the maximum extent ....").

We therefore recommend that the INRMP examine the examples addressed above and other opportunities for "ecosystem management" in cooperation with neighboring land management agencies. In designing and implementing plans for monitoring and natural resource management, DOD must use an 'ecosystem' approach, and that DOD must coordinate to the extent possible with neighboring land management agencies.

VI. *The Plan Must Provide for Public Involvement in Amendments.*

A major purpose of monitoring is to ensure that there is a "feedback loop" so that planners can learn the impacts of permitted actions, whether progress is being made toward achieving planning goals, etc. The concept of "adaptive management" ensures that managers do not blindly follow rigid plans, but rather that they can constantly improve their plans to respond to new data. The flip-side of adaptive management, however, is that plans can become so vague and malleable that they are rendered meaningless. Plans can also lose public support when they are changed without public involvement or justification.

To steer between these two extremes, agencies must set standards for when and how plans are to be amended, and how the public will be notified and involved in such changes. The MLWA of 1999 provided that the INRMP should "provide procedures to amend the plan as necessary." MLWA of 1999, Sec. 3031(b)(3)(E)(x). Plans such as this should provide for amendment more often than 5 years, in order to permit DOD to respond to new information as it becomes available. The essence of adaptive management is the flexibility to respond to monitoring information and feedback. However, because amending the INRMP may be as momentous as adopting it, the DOD should require the same kind of public involvement and

review as was required for adoption of the INRMP. The CMP would therefore contain the following requirements:

- DOD may amend the INRMP following its adoption in response to monitoring, new information, or changed circumstances. When DOD identifies a need to amend the plan, it shall notify the intergovernmental executive committee and members of the interested public. DOD shall state the need for amendment in any public notice. DOD shall publish notice of its intent to amend the INRMP in the Federal Register. All proposed amendments shall be subject to an EA or an EIS pursuant to NEPA, and all other applicable laws. DOD shall solicit public comment through at least one public hearing, and a written public comment period of no less than 30 days. DOD shall consider reasonable alternatives to their own proposed amendment.

We note that the US Forest Service's planning regulations require that *all* amendments, whether deemed "significant" or not, can be implemented only after public notification and NEPA compliance. 36 C.F.R. § 219.10(f). The agency generally undertakes an environmental assessment (EA) even for non-significant amendments. DOD should do the same.

ESSENTIAL ELEMENTS OF THE CONSERVATION MANAGEMENT PLAN

ESTABLISH an ECOLOGICAL BASELINE and MONITORING PROTOCOLS, and DEFINE DESIRED FUTURE CONDITIONS

The MLWA of 1999 requires the BMGR to produce a report in five (5) years "describing changes in the condition of the lands withdrawn." MLWA of 1999, Sec. 3031(b)(5)(A)(i).

The preparation of this report demonstrates two important needs that the INRMP must address. First, the INRMP must identify the baseline conditions for natural resources on the BMGR. Second, the requirement demonstrates DOD's need to design and implement a threat-based resource monitoring program that integrates similar efforts on neighboring federal land. See, e.g., S. Cornelius et al., "Building the Case for Ecosystem Monitoring in the Sonoran Desert," (May 2000) (4 pp.), attached hereto as Ex. 1.

Addressing these two needs will greatly assist the BMGR in understanding the resources at stake, the threats to those resources, and how to effectively respond to such threats.

I. ***Establish a Baseline.***

To address the first need, the Range must start with a thorough understanding of wildlife and plant populations and communities, the ecological process that support and affect them, and the impacts of management and other human activities on them. Thus, in order to best protect the region's natural resources, and to understand them, the INRMP should:

- describe the BMGR's current ecological conditions (i.e., set the baseline);
- identify all significant data gaps;[3] and
- define and implement a plan to fill those gaps.

In order to understand the BMGR's existing ecological condition, the INRMP must identify and describe not only the existing composition and structure of plant and animal communities in and around the BMGR, but it also must identify and describe the functioning of natural processes. DOD guidance similarly requires that biological inventories "should include, at a minimum, soils, vegetative communities, critical species (e.g., threatened and endangered, locally rare, keystone), and delineation of wetlands and water sources." IM 4715.3, Para. 6.1.8.1.

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[3] See IM 4715.3, Enclosure 7, para. E7.2.3. (INRMP shall contain "Information on areas that have not been inventoried and a plan for completion of the inventory").

The INRMP should serve as a tool to gather and synthesize data about the Range and its environment, to obtain the baseline data against which future reports can measure "change." The LEIS for the withdrawal of the Range largely failed to do so, nor does any other document prepared by management agencies over the last decade adequately address these issues.

For example, despite widespread recognition of the BMGR's rich community of desert life, there has been no systematic inventory to identify the presence and distribution of wildlife species across the BMGR (but see Turner and Schwalbe 1997 for one area). The native biodiversity of the Range cannot be adequately managed and protected without better knowledge of what is present, and where. A well-designed inventory would provide vital baseline data for monitoring future losses of biodiversity and changes in species distribution.

Thus, with respect to wildlife and plant communities, the INRMP should contain the following requirements:

- Fully fund and conduct systematic inventories of all major wildlife taxonomic groups, including amphibians, reptiles, birds, mammals, and invertebrates. Prepare annual reports for public review summarizing the results of such inventories. Coordinate inventory work with that of other land management agencies.

Similarly, as part of the INRMP, the DOD should identify and inventory rare plants on the BMGR, and designate a list of plant species or communities of special concern. It should also attempt to identify threats to the continued viability of these plant species or communities, and identify ways to monitor how those threats may impact special concern species/communities.

The CMP would therefore require that the DOD undertake systematic inventories for wildlife and plants to identify baseline conditions for biological resources as part of INRMP preparation.

II. *Develop a Monitoring Plan and Desired Future Conditions.*

To address the second need - designing a monitoring program - the BMGR should adopt a monitoring plan that contains a list of parameters to be monitored. The BMGR should work closely with other land management agencies to define parameters for monitoring, particularly where resources may overlap administrative boundaries, or move across them. Frequency of monitoring should be identified in the INRMP. Parameters should be regularly monitored in order that the agencies be able to assess not just a snapshot of resource conditions every five years, but trends over a shorter interval. This would give resource managers greater ability to identify and respond to emerging threats.

The "LAFR Plan" recognized the importance for monitoring and updating information, and recommended numerous inventories and data gathering exercises. See, e.g., B. Tunnicliffe et al., "Natural Resource Management Plan for Luke Air Force Range," (Nov. 1986), hereafter

"LAFR Plan", at 7-13, ("7-2. Include a comprehensive vegetation survey as part of the required NEPA process prior to any development ... [or] use of an area. 7-3. Utilize newly gathered botanical investigations to update the vegetation map developed for this Plan. 7-4. Develop a systematic database containing currently available botanical information, into which newly acquired data can be added in order to assemble a comprehensive survey of vegetation resources over time.") We endorse this emphasis.

In order to facilitate effective monitoring, the INRMP should define, or at least identify a process for defining as part of its implementation, ecological desired future conditions (DFCs) to use as benchmarks for tracking management progress. Defining such ecological DFCs will permit the DOD to best identify those parameters which it should monitor to understand the impact of military and other activities on the ecosystem. In other words, defining ecological DFCs can provide important benchmarks against which to track management progress and to define appropriate management strategies. To the extent practicable, ecological DFCs should be based on a scale that recognizes ecological, rather than political or administrative, boundaries. While DOD guidance may not contain the term "DFC" explicitly, it does state that DOD should develop a "vision of what constitutes desirable future ecosystem conditions for the region of concern." IM 4715, Enclosure 6, Para E6.2.4.

We propose the following guideline for establishing DFCs for the BMGR:

- Management of natural resources should ensure the preservation, protection, and restoration of all native species and all native plant and animal communities and associations in natural patterns of abundance and distribution. The INRMP must attempt to describe what such patterns of abundance and distribution are on the BMGR, and what they would likely be were it not for the impacts of human activities on the BMGR.

- Management of natural resources should ensure the preservation, protection, and restoration of natural ecological processes. Again, the INRMP must describe how ecological processes now function on the BMGR, and how they would likely otherwise function were it not for the impacts of human activities on the BMGR.

We note that these principles coincide with those established by DOD for incorporating the preservation of biodiversity into DOD management of natural resources. IM 4715.3 (May 3, 1996), Para. 6.2.2. requires that "Biodiversity conservation on DOD lands and waters shall be promoted when consistent with the mission and practicable to achieve the following goals: ... Maintain or restore remaining native ecosystem types across their natural range of variation .... Maintain or reestablish viable populations of all native species in an installation's areas of natural habitat, when practical.... Maintain evolutionary and ecological processes, such as disturbance regimes, hydrological processes, and nutrient cycles."][4]

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[4] Enclosure No. 6 to Instruction Memo 4715.3 defines ecosystem management in similar terms:

Ecosystem management involves conducting installation programs and activities in a manner that identifies, maintains, and restores the "composition, structure, and function of natural communities that

To understand the impacts of military and other activities that may affect Range resources, the INRMP should also define the specific objectives of a comprehensive ecological monitoring plan, emphasizing local and regional threats, that will be implemented during the next five years. The data collection that constitutes monitoring should be targeted to address specific management issues. Additionally, monitoring must not only address those indicators that are a measure of species or community viability, but should assess the status of particular threats to that viability. Only then can the BMGR understand whether and how management actions can reduce threats. Finally, monitoring should occur at a variety of scales, but at a minimum at a regional level. This will require data sharing among agencies and an analysis of data at regional scales. The INRMP should therefore contain a commitment to design and implement such a monitoring strategy for the BMGR in cooperation with other agencies.

PROTECT and RESTORE ROADLESS LANDS and WILDERNESS CHARACTER

I. *Inventory and Protect Wilderness Character and Roadless Lands.*

The CMP proposes that DOD, through its planning process, protect and where practicable restore wilderness character and roadless lands on the BMGR.

A. *The Need to Protect Wilderness Character and Roadless Lands.*

Protecting roadless and wilderness character is critical to protecting the ecological health and biological diversity of the Sonoran desert. Despite the passage of the Wilderness Act in 1964, and the Federal Land Policy and Management Act (FLPMA) of 1976, no inventory of roadless and potential wilderness values of the BMGR has ever occurred. See Section 603(a) of the Federal Land Policy and Management Act (FLPMA) (16 U.S.C. § 1782(a) (requiring wilderness inventories); FLPMA Section 201 (requiring BLM to maintain ongoing inventories of land values, including wilderness character); and the Wilderness Act Section 3(d) (16 U.S.C. § 1632(d)). While the Sikes Act does not specifically mention these values, DOD clearly must recognize them and protect them ***because of their tremendous importance to wildlife conservation, ecosystem protection, and recreation***. In addition, we note that in the last two years, considerable public support has arisen for the creation of a National Park and Preserve or other special status land designation including some or all of the BMGR. Sen. John McCain has introduced a bill (S. 1963) that would require DOD and the Department of the Interior (DOI) to "assess the feasibility and practicability of the establishment" of a such a park and/or preserve "in all or parts of the" BMGR. The National Park Service and other federal land management agencies (including BLM and US FWS) do have a mandate to protect wilderness character, and the DOD should not take actions that would destroy these potentially valuable Park resources.

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comprise ecosystems," to ensure their sustainability and conservation of biodiversity at landscape and other relevant ecological scales to the maximum extent that mission needs allow.

The critical value of roadless areas to wildlife and biological diversity has become better understood and demonstrated in recent years. For example, the US Forest Service (USFS) is now attempting to identify and protect such values on its lands. It has prepared an extensive Draft EIS describing the importance of such areas. See http://roadless.fs.fed.us (the USFS's Draft EIS can be downloaded from this site). The USFS's Draft EIS also contains dozens of references concerning the damaging impacts of roads on the diversity of life. In addition, Forest Service guidance and federal caselaw require that the agency conduct an environmental impact statement (EIS) before roadless values are destroyed.[5]

There is a large body of scientific literature describing the negative biological effects of roads, including direct wildlife mortality, changed animal behavior, degraded habitat, habitat fragmentation, and the spread of exotic species.). See, e.g., Environmental Defense Fund, "Defending the Desert," (1995) 53-54, 58 (describing generally the damaging impacts of roads and motorized trails in a desert environment). Studies demonstrate that higher occurrences of adverse ecological impacts increase with higher road densities. Roads result in frequent and often negative encounters between wildlife and humans (Buckley and Pannell 1990). Wildlife biologists have recognized problems with open roads that expose large mammals such as deer, pronghorn, cougar and bighorn sheep to heavy hunting pressure, poaching, and harassment (Davidson et al. 1996:110; Trombulak and Frissell 2000:24). Open-road density is a good predictor of habitat suitability for large mammals, with habitat effectiveness and population viability declining as road density increases (Noss and Cooperrider 1994). Other studies indicate that habitats with low road density better protect species sensitive to legal or illegal hunting and persecution (Thiel 1985; Mech et al. 1988).

Primitive roads, maintained or not, create adverse impacts on natural resources. Possibly the most significant adverse impacts on arid biological communities relate to exotic plant invasions along road corridors (see Davidson et al. 1996:111). Disturbed surfaces provide ideal habitat and avenues for exotic plants to spread (Trombulak and Frissell 2000; Amor and Stevens 1976). Research indicates that large roadless areas with low circumference-to-area ratios offer the best protection of arid and semi-arid ecosystems against wholesale conversion, and that maintaining their roadless character offers the most economical strategy for preventing the spread of introduced grasses to relatively undisturbed areas (see Davidson et al. 1996:112). Scientists suggest that exotic weed invasion might be prevented by restricting access on existing roads (Davidson et al. 1996:112).

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[5] Current Forest Service guidelines implementing the National Environmental Policy Act (NEPA) require an environmental impact statement (EIS) for "proposals that would substantially alter the undeveloped character of an inventoried roadless area of 5,000 acres or more." FSH 1909.15 Section 20.6(3).

Federal courts have struck down Forest Service environmental assessments where they have failed to address adequately the impacts of proposed timber sales on the roadless nature of the areas involved, even where subsequent to RARE II the areas have been passed over for wilderness designation, and even where Forest Plans have enacted prescriptions for the areas that anticipate multiple uses such as logging in the areas. Smith v. US Forest Service, 33 F.3d 1072 (9th Cir. 1994); National Audubon Society v. US Forest Service, 46 F.3d 1437 (9th Cir. 1993). This review is required because, among other things, such roadless areas could again be considered for wilderness designation during preparation of the next Forest Plan. See Smith v. US Forest Service, 33 F.3d at 1078.

Even though roads occupy a small fraction of the landscape in terms of total area, their influence extends far beyond their immediate boundaries. Roads precipitate habitat fragmentation by dissecting otherwise large patches into smaller ones, and in so doing create edge habitat along both sides of the road, potentially at the expense of interior habitat (Trombulak and Frissell 2000; Reed et al.1996).

Other undesirable consequences of road access include illegal collecting of rare plants and animals (Noss 1995). The additional vehicular access provided by primitive roads facilitates illegal excavation and collecting of archaeological resources. For example, improvement in mine-related roads in the 1980s outside Grand Canyon National Park resulted in increased visitation to the Kanab Plateau and a corresponding increase in vandalism to cultural resources (Huffman 1993). BLM managers of the Goldwater Range are well aware of the impact of motorized access to archeological resources. Archeological sites at Tinajas Altas and Baker Peaks have, in the recent years, been destroyed by vandals and uninformed visitors, in large part because of direct (as well as indirect) impacts from motor vehicles. Only after citizens and archeologists complained about the obliteration of certain sites did BLM undertake efforts to limit off-road vehicle (ORV) use and improve public education in these areas.

In addition to impacts on archaeological resources, adequate maintenance of primitive roads in remote locations imposes significant ecological as well as monetary costs. Poorly located or unmaintained roads often result in serious erosion problems (Moll 1996; Ketcheson and Megahan 1996). Severe gully formation negatively impacts soils, vegetation, and archaeological resources. The most practical and economical long-term mitigation of these problems is closure and revegetation (Moll 1996).

A review of the literature underscores the importance to conservation of not building new roads in roadless or sparsely roaded areas and of removal or restoration of existing roads to benefit native biota (Trombulak and Frissell 2000:18,26). Sections of the BMGR, a spectacular and biologically rich area, contain a network of rough jeep trails that impact natural resources such as desert soils and vegetation, and probably adversely affect wildlife species such as bighorn sheep and mountain lion.

All of these studies demonstrate the importance of protecting existing roadless areas (as well as the need to identify redundant, unneeded or damaging roads for closure, as discussed elsewhere in this letter).

B. *CMP Recommendations.*

Because of the need to identify and protect roadless and wilderness values, the USAF and USMC should, as part of the INRMP process:

1.1.1 Inventory the BMGR for potential wilderness and roadless values. Use protocols for undertaking such inventory that are consistent with those developed by the Bureau of Land Management for its lands (see BLM's 1978 Wilderness Inventory Handbook).

1.1.2 Consider the impacts on roadless and wilderness character in all NEPA documents concerning site-specific actions.

1.1.3 Identify and protect all roadless areas greater than 1,000 acres by prohibiting road construction, extractive uses, vehicular access, the erection of new structures, and damaging military activities in such areas. At a minimum no destruction of roadless or wilderness character should occur.

II. *Protect the Wilderness Character of Adjacent Lands by Closing "Roads to Nowhere."*

The BMGR's neighbor, the Cabeza Prieta NWR and Wilderness, is the largest wilderness refuge in the lower 48 states. The Refuge contains some of the most pristine desert in North America. In managing the resources of the BMGR, the DOD should respect, protect, and aid the restoration of the wilderness chracter and wildlife values of the Cabeza Prieta NWR.

For example, there are a number of BMGR roads that provide access to the northern boundary of the Refuge. Virtually every one of these roads hits the Refuge boundary at designated wilderness. These roads thus provide an easy vector for potentially destructive and illegal entry onto Refuge lands. We note that Cabeza Prieta NWR proposed to close to motor vehicle access and reclaim as "obsolete" virtually every trail into wilderness that is a continuation of these roads. FWS, Final Programmatic EA and Draft Comprehensive Conservation Plan for Cabeza Prieta NWR (Sep. 1998) at Map #8, attached as Ex. 2. At an absolute minimum, these roads must be signed where they terminate in wilderness and physical barriers erected to prevent, where possible, illegal motorized access to wilderness.

We also note that most of these BMGR roads apparently serve little or no public recreation purpose, although they may provide some access to the BMGR (not the Cabeza Prieta NWR) for military purposes. For example, the road that meets the Refuge boundary within Range 15 West (about 8 miles due north of Cabeza Prieta Peak) may be an attractive nuisance to those seeking to illegally access the northeast part of the Cabeza Prieta NWR (within wilderness) via motor vehicle. This road appears to serve little or no public recreation purpose. It may serve some military purpose, since "stinger teams" apparently operate near the Refuge boundary on or near this road. See USN, TACTS Range Upgrade Final EA (Aug. 1996) at Figure 4. One solution to this problem may be to simply close the last 5 miles or so of the road to public recreation motorized use, leaving the road open to DOD and agency use up to the border with Cabeza Prieta NWR and Wilderness.

Therefore DOD should adopt the following standards to manage the BMGR:

1.2.1 Undertake all measures necessary to protect the wilderness character of the Cabeza Prieta NWR.

1.2.2 Ensure that military personnel routinely receive training concerning the location of wilderness and the legal requirements concerning its management.

1.2.3 Within 90 days of adoption of the CMP, conspicuously sign all motorized routes that terminate at Refuge and wilderness boundary as closed to all vehicle use beyond the Refuge boundary, where such signage does not now exist. Where possible and feasible, erect physical barriers to block motor vehicle access to Refuge wilderness within 90 days of adoption of the CMP.

1.2.4 Decommission and reclaim (revegetate, recontour, etc.) those motorized routes with no military purpose likely to facilitate illegal motorized access to Cabeza Prieta NWR's wilderness within 1 year of adoption of the CMP.

1.2.5 Ensure that the BMGR's boundary with the Refuge and Wilderness is signed to alert public users and military personnel within 90 days of adoption of the CMP.

1.2.6 Monitor illegal motorized access to wilderness from the BMGR. Fully fund the enforcement positions necessary to prevent such illegal use.

PROTECT ROADLESS and WILDERNESS CHARACTER and ECOLOGICAL VALUES by CAREFULLY MANAGING VEHICLE TRAVEL.

BMGR is a national treasure with over 1 million acres of relatively undisturbed Sonoran desert. People deserve to enjoy, appreciate, and learn about the Sonoran ecosystem. Public use comes with costs, however, and visitation is expected to rise as the populations of Phoenix and Tucson increase and more people discover the wonders of southwestern Arizona. In its ecological analysis of the Sonoran Desert Ecoregion, the Nature Conservancy found that recreation was one of the leading threats to the ecoregion, affecting 72% of conservation sites (exceeded only by introduction of invasive species). Clearly, then, DOD cannot hope to maintain and restore native ecosystem types, viable populations of all native species and ecological processes without carefully managing vehicle travel. The BMGR must be proactive and anticipate public use demands over the next 25 years.

We note first that the Sikes Act requires that the DOD must provide for "the sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping, and nonconsumptive uses; and ... subject to safety requirements and military security, public access to military installations to facilitate the use." 16 U.S.C. § 670a(a)(3)(B) – (C); see also MLWA of 1999, Sec. 3031(b)(3)(E)(i) (requiring that the BMGR INRMP provide for "sustainable use by the public"). Thus recreational use of the area must be "sustainable," as well as consistent with safety and security. Further, the MLWA also permits the DOD to close "any road, trail, or other portion of lands withdrawn" whenever it determines "that military operations, public safety, or national security require the closure." MLWA of 1999, Sec. 3031(b)(2)(A).

I. ***Prohibit Vehicle Travel Off-Road.***

Intrusions by motorized vehicles represent one of the gravest threats to wildlife and habitat values. This is particularly true in the arid Southwest where fragile cryptogamic soils can be destroyed by vehicles and take decades or even a century to recover. Vehicles can destroy vegetation, and harass or frighten wildlife. See, e.g., Environmental Defense Fund, "Defending the Desert," (1995) at 49-62; and studies cited in "Off-Highway Vehicle Impacts on Desert Ecology: Reference List," attached as Ex. 3. Vehicular traffic directly destroys biological resources by crushing vegetation and microbiotic crusts and retards revegetation through soil compaction. Sensitive wildlife such as Sonoran pronghorn, bighorn sheep, Sonoran tortoise and mountain lions are adversely affected (Trombulak and Frissell 2000; Reed et al.1996). A petition recently filed with the US Forest Service requesting that that agency enact more strict limits on off-road vehicle use also contains useful information detailing the harmful effects of off-road travel. See www.wildrockies.org/wildcpr/petition/.

Previous resource management documents for the BMGR have recognized the potential harmful impacts of off-road driving on the Range. For example, BLM's operative management document, the Goldwater Amendment to the Lower Gila South Resource Management Plan (RMP), currently "***prohibit[s] public off-road or cross-country vehicle travel***" of any kind. BLM, Lower Gila South RMP (Goldwater Amendment), at page 15 (emphasis added); see also id. at 14 ("all vehicles restricted to designated or established roads"). These policies were adopted to protect Range resources, including plants, wildlife, soils, and cultural resources, among others. These policies should continue and be applied throughout the Range.

In addition, the US Fish and Wildlife Service, in its biological opinion on the Goldwater Amendment (dated Mar. 27, 1998) at 23, ***required*** that BLM "[m]inimize human disturbance ***by limiting or eliminating off road vehicles*** within Sonoran pronghorn habitat" (emphasis added).

The LAFR Plan put the matter bluntly: "Off-road use has only negative effects on the natural and cultural resources of LAFR. It also interferes with other land uses and can be unsafe in areas where live ordnance lies on or under the surface. Therefore, the USAF and the USFWS have closed all portions of the Range to general off-road use." LAFR Plan at 11-15. We agree with this assessment, and with the recommendation in the LAFR Plan to close the BMGR to such use.

Off-road vehicle use by military vehicles has also damaged BMGR's natural resources. Photos contained in the LAFR Plan, at 12-24 – 12-25, graphically illustrate that "Random off-road driving of military vehicles has devastated large areas within the LAFR Sonoran Desert." Off-road driving by DOD personnel is likely to have been as damaging – if not more damaging – to the natural resources of the BMGR than driving by the public or other agencies. Even within TAC Ranges and other impact zones, military driving off-road has caused unnecessary damage to desert natural resources.

In short, off-road vehicle use is neither "sustainable" in terms of its impact on soils, vegetation, or wildlife, nor it is consistent with safety and security. Off-road vehicle use would thus appear to violate the MLWA and the Sikes Act's mandates that public uses of natural

resources be "sustainable," discussed above, as well as the Sikes Act's requirement that public uses be "not inconsistent with the needs of fish and wildlife." 16 U.S.C. § 670a(b)(1)(F).

The CMP would therefore require the DOD adopt the following standards in managing the BMGR's natural resources:

2.1.1 The USAF and USMC should identify in the INRMP a transportation system that is the absolute minimum necessary to achieve military purposes through the INRMP planning process. The agencies will identify in the INRMP ***and close as soon as possible*** redundant, unnecessary, or damaging travel routes.[6] Sign all "closed" routes within 90 days of the adoption of the CMP. Implement all required route closures (through blockage, remediation, revegetation, and recontouring, for example) within 1 year of the adoption of the CMP.

2.1.2 In establishing a transportation system for the BMGR, identify those roads that are open for military use but closed to the public. Close to the public (a) those routes that serve no public recreation purpose; and/or (b) such routes as are necessary to protect natural and cultural resources from legal or illegal public use.

2.1.3 Prohibit all vehicle travel off-road, whether permitted by or undertaken by DOD. Public transportation for recreation shall be permitted only on designated roads.[7]

2.1.4 The Range shall adopt a "closed unless signed open" policy; that is, all roads shall be closed to public use unless specifically signed as "open" to such use on maps AND on the ground. Post all "open" routes within 90 days of the adoption of the INRMP. [Increasingly, this "closed unless open" policy is being adopted by Federal land management agencies across the West, even multiple use agencies such as the BLM and US Forest Service. We note that the LAFR Plan, at 11-15, recommended a similar approach ("11-6. Identify and clearly post which roads are open and which are closed to public use ....").]

2.1.5 Designate only man-made, constructed roads as travel routes. Prohibit all off-road driving in desert washes. Do not designate washes as transportation routes or roads. Post previously used washes as "closed" with signs within 90 days of the adoption of the INRMP. [Because they trap or channel much of the precipitation that falls in this extremely arid environment, riparian areas and desert washes are areas "where wildlife values are high." See BLM, Lechuguilla-Mohawk Draft Habitat Management Plan (HMP) (1997) at 22. Permitting

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[6] We note that the LAFR Plan, at 11-15, recommended a similar approach ("11-7. Close those roads that are unnecessary to meet clearly identified agency missions and safety needs, and allow the roadbeds to recover to their natural character, rehabilitating sensitive sites as needed"). The Lechuguilla-Mohawk Draft HMP (at 1, 17) also proposed a similar inventory and closure process.

[7] The LAFR Plan, at 12-24, Recommendation, urged restrictions on military off-road driving: "Restrict military activities ... to travel on designated roads only; other military maneuvers should be prohibited ...."

indiscriminate vehicle travel in desert washes could cause significant negative impacts to habitat values in these areas which are corridors of life in the desert.]

2.1.6 Prohibit use of all-terrain vehicles designed for off-road use (e.g., ATVs, and non-street-legal dirt bikes, motorized tricycles, tracked vehicles, dune buggies) throughout the BMGR given the difficulty of managing and enforcing the ban on off-route travel, and the severity of damage such vehicles can cause.

2.1.7 Fund sufficient enforcement positions (at least 6) to ensure that the above restrictions are complied with by the public.

2.1.8 Implement road and route closures (through blockage, remediation, and revegetation, for example) within 1 year of the adoption of the INRMP, and do so in an ecologically sensitive manner.

[We note that the Lechuguilla-Mohawk Draft HMP proposed the following to close unnecessary routes: "disking the roads, and (if necessary) blocking the beginnings of the roads with berms, rocks, or vegetation." HMP at 17. One of the primary pathways for the spread of exotic plants is soil disturbance. Clearly, disking has the potential to cause tremendous disturbance to fragile desert soils. Cryptobiotic soils may take years to establish once such activity occurs. Of course, where the areas have been used by vehicles, such disturbance may already have been accomplished. But given that Sahara mustard is now the "most common roadside annual in Southern Arizona," HMP at 4, it is likely that this plant finds more fertile ground in disturbed area. We suggest that the USAF and USMC investigate first blocking the roads, together with revegetation of road beds. This is the method proposed for use in the Draft Kofa National Wildlife Refuge and Wilderness Management Plan, released in 1997.]

2.1.9 Prohibit competitive events (including races) using the BMGR transportation system. [We note that the BLM had previously proposed that no "organized or competitive off-road events will be permitted" on BMGR. See Lechuguilla-Mohawk Draft HMP at 21; Goldwater Amendment Record of Decision (Nov. 13, 1990) at 5).]

2.1.10 Establish a monitoring protocol that will evaluate the nature, extent, and impacts of off-road (and on-road) vehicle use on the BMGR. Publish annually for public review a summary of such monitoring results.

The CMP would also incorporate the following measures recommended in the 1986 LAFR Plan at 14-50 – 14-51 relative to management of recreational activities:

14-12. Clearly communicate to visitors the hazard of off-road travel in LAFR because of the presence of surface and buried live ordnance. Actively enforce the prohibition against off-road recreational travel [including in wash bottoms].

14-13. Interpret to visitors the damage caused to soils, vegetation, cultural resources, and wildlife by off-road travel as a means to enlist their cooperation in staying on designated roads.

14-14. Communicate to visitors the vehicular rules that apply to LAFR. (See also LAFR Plan recommendation 11-8: "Communicate road and vehicle use rules to all Range users," LAFR Plan at 11-15).

14-23 Implement a well-organized and maintenance-conscious signing program; perimeter and interior signs are needed to notify visitors and agency personnel of the location of LAFR boundaries, rules of access, road closures, sensitive resource areas, safety considerations, and hazard locations.

Implementing these standards and goals will help ensure that roadless – and ecological – values will be protected and where possible restored on the BMGR.

II. ***Carefully Manage Necessary Motorized Routes.***

The CMP would prohibit paving on the Range, and limit grading or road "improvements" to the minimum necessary to achieve military objectives. Paving will permit military and civilian vehicles to drive at even higher speeds, resulting in a greater likelihood of mortality to wildlife caused by roadkill. As such, paving may threaten wildlife species including the Sonoran pronghorn antelope. Paving may also have more disruptive impacts to hydrology, has a greater impact on local microclimate, and may result in an increase in vehicle use.

As noted above, roads are some of the most destructive structures in terms of impacts on wildlife. They fragment habitat, increase risk of poaching and roadkill, alter hydrology, and act as a source for exotic weeds and increased recreation pressures. For all of these reasons, and because of the extensive existing network of routes on the BMGR, all new route construction should be prohibited.

The CMP would adopt the following standards, initially proposed in the LAFR Plan (at 11-15):

11-1 Plan all future road development … as well as road maintenance, as per NEPA [National Environmental Policy Act] procedures, and comply with environmental and resource protection laws and regulations.

11-4 Coordinate agency and public access needs closely in … non-Refuge portions of LAFR to avoid conflicts or replication in road development, use, and management.

11-5 Maintain a comprehensive inventory of road mileages, locations, and classifications in order to facilitate management of an appropriate road system,

building on the base map developed by the NRMP. [This base map should be updated in the INRMP.]

11-9 Prohibit public and agency off-road use on all LAFR lands as per USAF and USFWS regulations except in designated activity areas and in emergency situations.

11-10 Authorize off-road use [within previously impacted areas or in emergency situations only, and] only after the requirements of NEPA and other environmental and resource protection laws and regulations are fully met.

11-11 Clearly communicate to the public and agencies that the Range is closed to off-road vehicle travel, and any all-terrain vehicles designed for off-road use.

11-12 Use existing roads wherever possible to retrieve downed aircraft. The recovery should be conducted to provide maximum possible protection of vegetation, soils, and other natural and cultural resources. [In addition, reclamation, including revegetation, should occur within 180 days of the completion of retrieval operations.]

In addition, the CMP adopts the following additional standards:

2.2.1 Prohibit the paving of travel routes on the BMGR.

2.2.2 Prohibit any new road development by all agencies. [There are more than enough routes on the BMGR already.]

2.2.3 Following any emergency agency off-road use, complete all reclamation, including revegetation, within 180 days of the off-road use.

[This is consistent with IM 4715.3 (May 3, 1996), Para. 4.2.12, which states: "Consistent with ecosystem-based management, altered or degraded landscapes and associated habitats shall be restored and rehabilitated whenever practical."]

2.2.4 For clarity by users, assign all roads a name or number for identification and place such identification on maps provided to users. Complete this process concurrent with the travel management plan for the BMGR.

2.2.5 Include in the INRMP aerial photographs or satellite photos showing the extent of the road network (and other ground disturbance) on the BMGR at specific intervals over the last 30-40 years. Include a current such photo as well, to establish a baseline that will permit a comparison of the current extent of the road network and ground disturbance with that in the INRMP update, scheduled for 5 years after the adoption of the INRMP.

PROTECT CRITICAL ECOLOGICAL and RESOURCE VALUES THROUGH SPECIAL DESIGNATIONS and MANAGEMENT REQUIREMENTS

The 1.6 million acre BMGR contains numerous areas with critical wildlife, wilderness, roadless, vegetation, archeological, and/or recreational values. Many of these areas are recognized in the LAFR Plan as "Class III" areas or "Special Interest Areas." LAFR Plan at 3-13 – 3-17; 14-3 – 14-19. For one of these special interest areas, the LAFR Plan recommended the following standard: "4-5. Consider special protection for that portion of the Sentinel Plain volcanic field within LAFR because the area has been previously proposed as a state natural area." For the others, the LAFR Plan (at 14-50) recommends as follows: "14-8. Provide special protection, as required by federal and state law and USAF regulations, when managing for recreation or other land use in Class III areas. These areas include ... State Natural Areas, Federal Research Natural Areas, primary habitat of Sonoran Pronghorn, water holes, and cultural sites."

In addition, the Goldwater Amendment to BLM's Lower Gila South RMP and EA identified three "areas of critical environmental concern" (ACECs), a "habitat management area," and two "special recreation management areas (SRMAs)."[8] For each of these areas, both the LAFR Plan and the Goldwater Amendment proposed management measures regulating both military and public use to protect the special values found there.

As noted above, the MLWA of 1999 ended BLM management of natural resources of the BMGR, and therefore the ACEC, SRMA, and Habitat Management Area designations. However, the MLWA of 1999 permits the BMGR to "incorporate any existing management plans pertaining" to the Range into the INRMP, thus permitting the BMGR to retain these designations. MLWA of 1999, Sec. 3031(b)(3)(E)(viii). While we oppose the whole-sale incorporation of BLM's Goldwater Amendment into the INRMP (see above), we urge the INRMP to retain these "special area" designations, and to improve and strengthen safeguards meant to protect their values.

We further note that the MLWA of 1999 did not eliminate the special values identified by BLM and other agencies. Information gathered since the LAFR Plan was compiled further demonstrates the unique values that require protection. See, e.g., Eakle and Smith, "Rare Plant Survey of the BMGR," (Sep. 1988) (detailing unique plants found in and around the Mohawk Dunes ACEC); Turner and Schwalbe, "Reptile and Plant Inventory of the Mohawk Dunes," (Apr. 15, 1997) (describing rare wildlife and plants found in that area and recommending closure of area to ORVs). These special values therefore merit special protection and management in the INRMP.

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[8] These special areas include: the Tinajas Altas ACEC (60,500 acres); Gran Desierto Dunes ACEC (25,500 acres); Mohawk Mountains and Sand Dunes ACEC (132,000 acres); Yuma Desert and Sand Dunes Habitat Management Area (84,500 acres); Sentinel Plain Lava Flow SRMA (92,000 acres), and Crater Range SRMA (11,920 acres). BLM, Goldwater Amendment Record of Decision (Nov. 13, 1990) at 6.

In addition, there may be other unique or important values on the Range that merit protection. Pursuant to Department of Defense Instruction Memorandum No. 4715.3 (May 3, 1996), the DOD has an independent duty to identify and protect areas with special values through the INRMP process. For example, IM 4715.3 requires as follows:

> [Para. 4.2.3.] Biologically or geographically significant or sensitive natural resources.... or species (e.g., threatened or endangered species, certain marine mammals, and migratory birds) shall be inventoried and managed to protect these resources, and to promote biodiversity, using the goals identified in paragraph 6.2.2., below.
>
> [Para. 6.1.10.] Portions of installation real property that have significant ecological, cultural, scenic, recreational, or educational value may be set aside for conservation of those resources, where such conservation is consistent with the military mission.
>
> [Para. 6.2.5.] Areas on DOD installations that contain natural resources that warrant special conservation efforts, after appropriate study and coordination, may be designated as special natural areas. The integrated natural resources management plan for the installation shall address special management provisions necessary for the protection of each area. Special natural areas include botanical areas, ecological reserve areas, geological areas, natural resources areas, riparian areas, scenic areas, zoological areas, "watchable wildlife" areas, and traditional cultural places having officially recognized special qualities or attributes.

Therefore, the CMP would require DOD to adopt the following standards:

3.1.1 Evaluate the Range for important ecological, wildlife, wilderness, roadless, vegetative, geological, cultural, scenic, educational, educational, recreational or other values as part of the INRMP process. Use data generated by TNC to identify the location of rare, imperiled, keystone, or significant plant and animal communities and associations.

3.1.2 Identify areas with such important values, and identify and implement standards that will protect such areas and move them toward DFCs. Such standards could include the designation of "Special Natural Areas" or other designation, as part of the INRMP process.

3.1.3 Protect all special interest areas and BLM-designated ACECs, SRMAs, and Habitat Management Areas (HMAs) with management guidelines at least as restrictive as those included in the LAFR Plan and the Lower Gila South Resource Management Plan, as part of the INRMP process.

Note that a number of other specific management recommendations contained herein attempt to mitigate or eliminate the potential or ongoing damage that specific actions may cause to such areas. See, e.g., recommendations concerning campsites, and imperiled species, among others).

In addition to the ACECs, SRMAs, and HMAs, the CMP would require that DOD consider designating for special protection the following areas:

- -- Baker Tanks [because of its natural communities centered on nearly-permanent water sources];
- -- all other tinajas and significant ephemeral water sources [for the reason set forth above and for the likelihood of significant cultural resources]; and
- -- Mohawk Valley and Lechuguilla Desert [for their vast expanses of virtually undisturbed lowland desert].

The list above is not inclusive; we would expect that the inventory process would identify other values and areas that require special management and protection.

The INRMP should also incorporate and adopt where possible recommendations suggested by the science of conservation biology, which may assist the BMGR in identifying ecological critical areas, important plant or animal communities, or threats to the same. Conservation biology is based, in part, on the theory that larger blocks of secure habitat protect biodiversity more effectively than a number of fragmented, smaller blocks. Conservation biology has also shown that interconnections in the form of secure travel corridors between large blocks of habitats is critical to assuring the viability of wide-ranging species. Conservationists applying conservation biology have recommended that land managers use research to identify: (a) critical habitats ("core areas") where human disturbance (particularly roads and motorized recreation) is minimized; (b) areas outside core area where more intensive uses may occur ("compatible use areas"); and important zones linking core areas ("landscape linkages") where human disturbance is also limited. The identification of such areas through research and monitoring could help guide management decision in terms of identifying sensitive areas where military and/or recreation activities should be limited, as well as those areas where such limitations may be less necessary.

As one example of how concepts of conservation biology should help guide BMGR management, the Range contains several large, wide-ranging species which are known to be sensitive to habitat fragmentation and to disturbance by human activities. These include desert bighorn sheep, which forage on mountain bajadas and travel between mountain ranges as part of their normal metapopulation dynamics, and Sonoran pronghorn, which use the valley bottoms as their primary habitat. The INRMP process should identify critical habitat areas and corridors to maintain and improve all existing populations of these species.

The CMP would therefore require as follows:

3.1.4 In evaluating the Range for important wildlife, habitat, and vegetation values as part of the INRMP process, apply principles of conservation biology. Implement standards to: (a) protect the wildlife and habitat values of identified plant and

animal communities and associations, and core areas and landscape linkages as part of the INRMP process, and (b) to move these areas toward DFCs.

MANAGE and MONITOR RECREATION to PROTECT ECOLOGICAL VALUES

I. *Maintain a Permit System to Protect and Educate Visitors and Monitor Recreation Levels and Impacts.*

The BMGR can be a forbidding and dangerous place for visitors, not only because of the harsh climate but because of the possibility for conflicts with ongoing military activities. At present, the BMGR has adopted an interagency permit application and issuance system to educate visitors about the dangers of such travel, and to obtain "hold harmless" sign-offs in the event of injury caused by military activities.

The INRMP should contain standards that require the continuation of a permit system for recreational access. The permit system should be used to acquire information about the location, nature, and frequency of visitor use, and to educate visitors about other values, such as the designated wilderness at Cabeza Prieta NWR, with which they may come in contact. Given that recreational use can and does impact the fragile desert's ecological integrity, gathering this information is an important monitoring tool. Use of the BMGR has increased in the past decade, so these impacts will likely increase over time.

The CMP would therefore include the following standards recommended in the LAFR Plan (at 14-50):

14-9 Develop and maintain better visitor use records that include statistics on user populations, visitor perceptions, and recreation use patterns.

14-10 Use traffic counters strategically placed and rotated among different Range access roads to show to what extent various roads are used to access the Range.

14-11 Implement more fully the protection measures for public safety discussed in Section 14.10, including warning visitors of existing and potential resource and military hazards.

The CMP would further contain the following standards:

4.1.1 Make available for public review and distribution an annual report of visitor numbers and recreation use patterns, compiled at the end of the permit "season" (June 30), beginning in 2001.

4.1.2 Use the permit system to educate visitors concerning the nature, values, and restrictions imposed by wilderness management on the adjacent Cabeza Prieta

NWR and Wilderness. Distribute maps clearly showing and explaining the wilderness boundary. Do not distribute maps displaying administrative use trails within wilderness.

II. *Monitor and Analyze the Impacts of Hunting.*

At present, limited hunting opportunities occur on the BMGR. Trapping is prohibited by state law. Hunting can be used as a tool to regulate wildlife populations. However, hunting can have direct, indirect, and unintended consequences that are not always without ecological costs.

Therefore, the CMP would apply the following standards to hunting in the INRMP:

4.2.1 Prior to permitting any increase in hunting on the BMGR, ensure that the USAF and/or USMC undertakes a full study and compliance with NEPA, ESA, and the Sikes Act of the environmental impacts of such an increase.

4.2.2 Through the INRMP process, evaluate the impacts of ongoing hunting to disturb or cause incidental take of threatened and endangered species, including the endangered Sonoran pronghorn antelope (SPH).

In addition, the CMP would include the following recommendations contained in the LAFR Plan.

14-15 Monitor more closely hunting … activities to determine accurate levels of participation, areas of use, and harvest levels.

14-17 Give consideration to implementation of a special permit and fee program for hunting and trapping as required by USAF regulations.
[See also Sikes Act, 16 U.S.C. § 670a(b)(3) (INRMPs may "stipulate the issuance of special State hunting and fishing permits to individuals and require payment of nominal fees therefor, which fees shall be utilized for the protection, conservation, and management of fish and wildlife, including habitat improvement and related activities in accordance with the integrated natural resources management plan ….”]

III. *Prohibit Fuelwood Gathering and Wood Fires.*

Given the sensitive, slow-growing nature of Sonoran desert vegetation, the INRMP should prohibit the building of campfires and the use or removal of woody material on the BMGR.

Fire is particularly damaging to desert soils. It kills cryptogamic crust, sterilizes the soil chemically, and breaks the soil's nutrient cycling. Campfires are also a source of wildfire that can harm a wide area of vegetation and soils for decades. Unlike many ecosystems, the Sonoran desert is not fire adapted. In addition, there are both ecological and aesthetic impacts from the removal of wood (live or dead, standing or on the ground) from large areas around the campsite,

and the burning of this wood in campfires. Cole and Dalle-Molle, 1982. Loss of large woody debris is likely to adversely affect populations of invertebrates, small mammals, and birds that use the wood as a food source or living place. Hendee *et al.*, 1990.

We note that the Lechuguilla-Mohawk HMP (at 20), which covered management of the eastern half of the Goldwater Range, also acknowledged that wood gathering and campfires may have serious negative consequences for the environment of the BMGR.

> [Wood] collection can conflict with habitat management objectives. Dead mesquite and ironwood provide nesting, food source and cover for lizards, birds and small mammals.

Id.

The adjacent Cabeza Prieta NWR and Wilderness prohibits all wood fires and prohibits the removal of any kind of wood from the Refuge. In addition, the Fish and Wildlife Service and Yuma Resource Area of BLM proposed to restrict fires and wood removal in the Draft Kofa NWR & Wilderness and New Water Mountain Wilderness Plan. See Draft EA (Dec. 1995) at 40. In that plan, the agencies proposed to ban wood gathering and the possession of ironwood on Kofa NWR, and to require visitors to bring non-native wood onto the Refuge for campfires. ***BLM also prohibited wood gathering in the three designated ACECs within the BMGR***. BLM, Goldwater Amendment to the Lower Gila South RMP (1989) at 20-25. This provision, however, may have had little impact at the Tinajas Altas ACEC, where observers report that there simply is no more downed wood to collect there, because campers over time have utterly depleted the area of such material. Downed wood is so scarce at Tinajas Altas that observers report visitors dragging downed wood behind their vehicles for miles to facilitate woodfires in the area. The loss of downed wood in this part of the BMGR thus has likely had harmful ecological effects there.

The INRMP should enact standards to prohibit woodfires to prevent a recurrence of this situation.

Given the demand for ironwood for carving, the slow-growing nature of these trees, and the importance of ironwood snags for soil development and to insects and other wildlife, ironwood deserves special consideration and protection in the INRMP.

The CMP would therefore include the following standards:

4.3.1 Prohibit woodfires and wood cutting and gathering throughout the BMGR. In the alternative, consider prohibiting wood-cuting but permitting woodfires with wood brought from outside the BMGR, but only after analyzing the potential that such an alternative would have to: (a) result in the importation and establishment of exotic invasive species; and (b) make more difficult the enforcement of the prohibition against wood cutting.

4.3.2 Prohibit the gathering or private use of ironwood for any purpose.

4.3.3 Monitor compliance with the two above standards to determine whether, where, and why the enforcement of wood-gathering prohibitions is protecting vegetative resources.

While monitoring of illegal or legal use of wood on the BMGR is important, it alone is not sufficient to protect Range resources. We believe that measures proposed in the LAFR Plan at 14-51 ("14-24. *Monitor* fuelwood collection along recreation road corridors to insure that use does not seriously deplete important natural habitats") is not sufficient, by itself, to protect critical vegetation resources.

Finally, we note that recreational use is not the only potential source of fire on the BMGR. Illegal aliens may start fires while camping. Military vehicle crashes, errant bombs, missile launches, flares, and other DOD activities may cause fire. Because of the severe impacts fire can cause in this ecosystem, the CMP should include the following recommendation proposed in the LAFR Plan, at 7-13, with recommended amendments in brackets.

7-6 Develop a Range-wide fire management plan ... that makes fire-suppression decisions on the basis of threat to human life, property, or endangered and threatened species[, important wildlife or plant species or communities, and achievement of DFCs]. The plan should include participation by the USAF, USMC, BLM, and USFWS. [The plan should be completed within 1 year of adoption of the INRMP, and should, to the maximum extent practicable, emphasize the protection of natural and cultural resources.]

IV. ***Locate Campsites Outside of Ecologically and Archeologically Sensitive Areas.***

The Lechuguilla-Mohawk Draft HMP proposed to close campsites within 1/4 mile of water sources for wildlife. HMP at 1. "Relocating traditional campsites away from water sources will make the water more available to all species of wildlife." HMP at 5. In addition, recreational activities associated with campsites have damaged not only wildlife habitat but other values as well. For example, BLM and BMGR took little action for years to halt damaging off-route driving and other recreational activities within the Tinajas Altas ACEC, much of it associated with camping. Archeological resources were irreparably harmed by recreation in this area.

The CMP therefore would adopt standards which would require the following:

4.4.1 Inventory the location of traditional campsites. Require the relocation of traditional campsites more than ¼ mile away from water sources within 1 year of the adoption of the INRMP. Reclaim closed sites within 18 months of the adoption of the INRMP.

4.4.2 Through the INRMP process, identify and protect other critical environmental resources, for example, critical soils, archeological sites, etc., and relocate

campsites with identified resource conflicts to protect those areas. Complete relocation and reclamation on the same schedule as noted above.

4.4.3 Evaluate in the INRMP and EIS the alternatives of restricting car camping to designated sites in certain sensitive areas as well as across the BMGR. Identify potential designated sites, locating them to minimize to the extent practicable conflicts with natural and cultural resource protection.

V. ***Other Recreation Issues.***

The LAFR Plan contained several other recommendations (with proposed amendments in brackets) which the CMP would include,:

14-18 Put into effect a well-developed action plan for inter-agency involvement in search and rescue to cover incidents involving recreation visitors ....

[This provision should be strengthened to apply to search and rescue for (a) illegal aliens and (b) downed aircraft or military personnel. The Plan should be adopted within 1 year of completion of the INRMP and mandate that such search and rescue operations will, to the maximum extent practical, (a) be consistent with protecting the natural and cultural resources of the BMGR, and (b) avoid off-road vehicle use.]

14-19 Appropriately manage the recreation aspects of the Range by adopting and implementing the Limits of Acceptable Change (LAC) system (see Section 14.11) and Recreation Opportunity Spectrum (ROS) (see Section 14.12).

In addition, we are concerned about stock packing access (including horses, goats, llamas and other stock). Currently, it is our understanding that such use of the Range is extremely limited. However, when compared to backpacker sites, stock sites are much larger, have many more damaged trees, have been more extensively invaded by exotic species, and have experienced much more profound soil disturbance. Cole, 1983. Trails permitting horse or other stock access are wider, deeper, more compacted, and less vegetated than those permitting only foot access. Stock trails also require considerably more maintenance than foot-only trails. Hendee *et al.*, p. 457. These impacts are likely more severe for the desert's fragile cryptobiotic soils. Also, because to the limited availability of free water on the BMGR for wildlife, and because of the potential for inter-species disease transmission, pack stock should be prohibited from drinking free water that is available to wildlife.

For these reasons, the CMP would require the following:

4.5.1 Evaluate the nature, extent, and environmental impacts of the current and potential use of pack stock on the BMGR. Consider methods that mitigate or eliminate the impacts of the use of horses and other stock on BMGR resources.

4.5.2 Require that pack stock, if permitted, be allowed only where it can be certified that stock is consuming certified weed-free, seed-free feed.

4.5.3 Consider limiting pack stock to roads and trails, where damage to fragile soils is likely to be contained.

4.5.4 Prohibit pack stock use of free water on the BMGR that is available to wildlife.

PROTECT RARE, IMPERILED and KEYSTONE SPECIES and COMMUNITIES

As noted above, we propose that the INRMP should attempt to ensure the preservation, protection, and restoration of all native species and all native plant and animal communities and associations in natural patterns of abundance and distribution. One key component of moving toward this DFC is the recovery of all threatened, endangered, rare, and imperiled species, and the plant and animal communities and natural processes that such populations require to remain viable and healthy. Management actions on the BMGR must not interfere with moving toward this DFC.

In addition, we propose above that DOD gather data concerning baseline ecological conditions, which would include the health and viability of wildlife and plant populations, and the natural processes that support them. Again, establishing baseline data concerning the health and viability of threatened, endangered, rare, and imperiled species, and assessing the nature of threats to their continued viability, will be a critical component of the INRMP process.

While these general requirements will be useful when applied to all species, communities, and associations, we propose that the INRMP contain several standards regarding specific species. Single-species management can result in a narrow focus that ignores overall ecosystem health, or the health of communities and processes. For this reason, DOD has adopted policy requiring the agency to "shift from single species to multiple species management, insofar as that is consistent with the requirements" of the Endangered Species Act (ESA). IM 4715.3 at Para. 6.2.2.1. In general, we agree with this approach. However, we believe that several proposed standards are needed to address critical wildlife needs of at least one specific species.

I. ***Protect Sonoran Pronghorn Antelope.***

The Sonoran pronghorn has been listed for thirty years with little sign of population increase. Most recovery efforts have focused on information gathering, with little changes in on-the-ground activities, or improved stewardship of existing habitat. Even with years of monitoring and research, many questions remain.

Some of the latest research on Sonoran pronghorn, conducted by Hervert et al. (2000), suggests some guidelines for habitat management. Hervert et al. found that Bajada habitats were preferred by pronghorn over other habitats regardless of the time of year. Research apparently shows that pronghorn preferred washes in the dry summer season, sacrificing visibility for thermal protection and increased forage. And research apparently shows that chain-fruit cholla is

important for pronghorn to maintain hydration. Provisions to map, assess the health of and threats to, and to protect these habitat types (bajadas, washes, and chain-fruit cholla stands), particularly during seasons of use, should be included in the INRMP.

The CMP would thus include the following standards:

5.1.1 Identify and map important plant communities and habitat types for Sonoran pronghorn antelope. Prohibit to the extent practicable activities that may: (a) disrupt Sonoran pronghorn use of such habitat; (b) that may disrupt the habitat itself (including, potentially, new ground and overflight disturbance) in such areas; or (c) result in any other direct or indirect harm to Sonoran pronghorn individually or to their viability.

5.1.2 Consider designating seasonal refugia for Sonoran pronghorn that limit or eliminate disturbing activities in such areas during times of critical stress for the species. DOD may consider designating such refugia as "Special Natural Areas," pursuant to recommendations 3.1.1 and 3.2.1 above.

5.1.3 Consider adopting larger buffer zones (up to ten (10) kilometers) around TAC ranges and around heavy construction activities within which military training would be limited or suspended upon the sighting of a Sonoran pronghorn antelope within the buffer.

5.1.4 Implement measures to conserve existing habitat, and identify opportunities to eliminate uses that may affect such habitat. [This is consistent with IM 4715.3 Para. 4.2.4: "Opportunities to conserve Federally listed species and the ecosystems on which those species depend shall be identified."]

5.1.5 Identify actions undertaken by DOD and/or other agencies that may cumulatively impact Sonoran pronghorn antelope.

5.1.6 Comply with the ESA and operative biological opinions for all permitted activities on the BMGR. [This is consistent with IM 4715.3 Para. 4.2.4 "Threatened and endangered species management and recovery efforts on DOD lands … shall be consistent with" the ESA.]

II. *Protect Other Threatened, Endangered, Imperiled, Locally Rare, and Keystone Species and Communities.*

The Draft LEIS for the renewal of the BMGR land withdrawal identified at least a dozen "special status" plant and animal species that are known or suspected to occur on the BMGR. Draft LEIS at 3-187 – 3-188. For each of these species, the INRMP should adopt standards similar to those recommended for the Sonoran pronghorn in paragraphs 5.1.1, and 5.1.4 – 5.1.6. However, as noted initially in this section, conservation efforts are likely to be more successful where they focus on associations, communities, and natural processes, rather than on single

species. For this reason, the CMP would require that the INRMP identify, inventory, and propose management standards that protect ***keystone*** species, as DOD policy requires.

These requirements should apply to both plant and animal species/communities.

IMPROVE WILDLIFE MANAGEMENT

I. ***Use the Best Available Science in Implementing Wildlife Management Actions.***

As noted above, DOD policy and NEPA regulations require that the BMGR utilize "best scientific information available" in developing its natural resource management plan. In addition, if scientific data are lacking, *before* a management change is made, appropriate scientific data should be collected, analyzed, and incorporated into appropriate decisionmaking processes and management actions. Thus, where potential impacts of an action are not well understood but could be harmful, DOD should not permit the action to occur. These requirements are particularly relevant and critical to wildlife management.

Nowhere have decisions in the past on the BMGR been based on less scientific information than with respect to the construction, maintenance and monitoring of artificial water developments. The scientific literature contains virtually no studies demonstrating that such developments benefit certain target species, such as bighorn sheep. The LAFR Plan noted a dearth of scientific evidence for the benefits or other impacts of such projcts on the BMGR. See LAFR Plan at 8-38 ("[o]ver 66 managed waters have been developed for wildlife on the [Goldwater] Range, and the full effect of these waters is unknown. The influence of water developments on desert bighorn and Sonoran pronghorn populations has yet to be fully delineated. The impacts of these waters on the numbers and distributions of nontargeted species remains undetermined.") In addition, numerous studies identify the potential for artificial water developments to alter wildlife interactions, concentrate wildlife use, spread disease, and assist in the spread or viability of exotic species. The Sikes Act requires that INRMPs provide for fish and wildlife habitat enhancement or modifications only "to the extent appropriate and practicable." 16 U.S.C. § 670a(b)(1)(C). Policy concerning the use of "best available" data, the use of the "precautionary principle," and requirements of the Sikes Act therefore dictate that DOD should reject proposals to construct new artificial water developments until the best available scientific evidence demonstrates that the developments help achieve DFCs for wildlife. The burden to develop such evidence should be placed on project proponents, and not on DOD.

The CMP would therefore adopt the follow standards:

6.1.1 Undertake and evaluate wildlife management activities (as well as all other permitted activities) based on the best available science.

6.1.2 Permit the construction of habitat altering wildlife projects (including artificial water developments) only after site-specific and programmatic compliance with NEPA, the ESA, the Sikes Act, and other laws meant to protect the environment. Such compliance shall evaluate the site-specific as well as cumulative impacts of

such projects, both individually and cumulatively. [The LAFR Plan at 8-38 recommended a similar standard: "[c]omply with NEPA and ESA regulations for all wildlife projects."]

6.1.3 Permit the construction of habitat altering wildlife projects (including artificial water developments) only after completing analysis and plans that evaluate the habitat, distribution, and population of target wildlife over time and in an ecosystem context, and that identify a goal for the projects – individually and cumulatively - based on moving plant and animal communities toward achieving DFCs.

6.1.4 Couple all habitat altering wildlife projects (including artificial water developments) with research programs designed to determine the impact of such development on targeted species as well as on other species and communities that may be affected. Modify or terminate those existing projects where they are not achieving the desired goal, or are not moving plant and animal communities toward achieving DFCs, or are resulting in harmful environmental impacts.

II. *Carefully Manage Predator Control.*

The BMGR INRMP should specifically address the issue of predator control, a controversial management tool that often has more costs and unintended consequences than benefits. Predator control measures should rarely, if ever, be necessary on the Range.

The CMP would therefore contain the following standards concerning predator control:

6.2.1. Do not institute predator control, except where such an action is determined to be essential to conserve or recover endangered, threatened, or declining species, or where such an action is determined to be the least damaging method of achieving DFCs. Any such program should be:

6.2.1.1. limited to the minimum duration and extent to achieve the goals stated above;

6.2.1.2. well targeted and tightly monitored;

6.2.1.3. part of an integrated program to conserve the resource the action aims to protect; and

6.2.1.4. approved only after an analysis, subject to public review and comment, that analyzes and discloses:

a. the impacts on the target species and non-target species, including predator-prey relationships;

b. the impacts to other predator and to prey species;

c. how the proposed action achieves the goals stated in 6.2.1; and

d. alternative to the proposed action.

CONTROL EXOTIC, INVASIVE and FERAL SPECIES

I. ***Control the Spread of Invasive Exotic Species.***

In its "Ecological Analysis of Conservation Priorities of the Sonoran Desert Ecoregion," The Nature Conservancy determined that invasive exotic plant species are *the most prevalent and dangerous threat to conservation sites*. Sahara mustard has been consistently identified by agency staff as an increasing threat to native plant and animal biodiversity in the Sonoran desert. Thus, in order to ensure the preservation, protection, and restoration of all native species and all native plant and animal communities and associations in natural patterns of abundance and distribution on the BMGR, a major goal of the INRMP should be the control and eventual elimination of invasive exotic species.

The CMP would therefore adopt the following standards to address the control of invasive exotics:

7.1.1 BMGR shall develop and/or ensure DOD participation in a Sonoran Desert invasive exotic plant management council/area, similar to what the Department of the Interior has put in place in many other parts of the West (including northern Arizona; Great Basin, etc.). DOD shall develop or join such a council/area within 1 year of the adoption of the INRMP.

7.1.2 BMGR shall develop an integrated exotic species management plan (IESPS) within 2 years of the adoption of the INRMP. The IESPS shall be developed in cooperation with adjacent other agencies with expertise in the area, and with adjacent land management agencies, and may include agencies of the government of Mexico. The IESPS should identify the threats posed by invasive exotic species to the BMGR at local and regional scales, and propose multi-agency efforts to address such threats. The IESPS may also address issues concerning trespass or feral livestock.

7.1.3 The IESPS should be guided by principles of "integrated pest management" (IPM), which ensures that the most appropriate control measures, with the least environmental impacts, are utilized in a particular situation.

7.1.4 As part of the INRMP, the BMGR shall develop monitoring protocols for invasive exotic species. The BMGR shall identify in the INRMP and through publication of a map, the location of all known occurrences of invasive exotic plant species. BMGR shall summarize the results of ongoing monitoring in a report to be published annually and made available to the public.

II *Eliminate Trespass and Feral Livestock.*

In 1986, the LAFR Plan adopted a recommendation that the land management "Eliminate all trespass grazing by livestock (cattle), goats, and feral animals (burros)." Recommendation 8-8, LAFR Plan at 8-39. Such a recommendation is apparently still needed today.

The 1997 Lechuguilla-Mohawk HMP notes that a small number of trespass cattle enter the BMGR from Mexico where the international boundary not fenced. HMP at 6. The BLM proposed to "remove all trespass livestock from the HMP area and prevent their recurrence" by FY 1998. HMP at 11; see also HMP at 20. We understand that cattle and burros from BLM and/or Tohono O'odham Nation land may also trespass in the eastern most portion of the BMGR.

The negative impact of livestock grazing on the ecosystems of the arid Southwest is well documented. See, e.g., Fleischner, "Ecological Costs of Grazing in Western North America," Conservation Biology, Vol 8, No. 3, 629 (Sept. 1994); National Wildlife Federation, "Grazing to Extinction," June 1994 (68 pp.). Livestock compete with native species for forage, destroy habitat, sensitive soils and archeological sites, and spread exotic plant species, among numerous other deleterious effects.

One method of ensuring the exclusion of trespass cattle is fencing. HMP at Appendix 1; see also LAFR Plan at 15-25, Recommendation #15-4 ("Maintain or construct fences where trespass grazing is a problem"). However, the BMGR must examine carefully the potential negative environmental effects of fencing prior to implementing such a strategy. Fences can require roads and motor vehicles for maintenance, which degrade habitat. Fences may also impede the movement of ungulates that utilize a range of territory, such as the desert bighorn, mule deer, and Sonoran pronghorn. Any environmental document prepared on a fencing project must address these issues. Should building fences be required, the BMGR should design fences to ensure that native species, particularly the Sonoran pronghorn, can navigate them without risking mortality. We note that the MLWA of 1999 provides that the BMGR INRMP must: "provide that all gates, fences, and barriers constructed on such lands after the date of the enactment of this Act be designed and erected to allow wildlife access, to the extent practicable and consistent with military security, safety, and sound wildlife management use." MLWA of 1999, Section 3031(b)(3)(E)(vii).

The CMP would therefore adopt the following standards:

7.2.1 Eliminate all trespass grazing by livestock (cattle), goats, and feral animals (burros) and prevent its recurrence.

7.2.2 Precede any additional fencing to control trespass grazing with environmental review (NEPA, ESA, etc.) that examines the environmental impact of fence construction and maintenance, and the impact of fencing on wildlife movement.

7.2.3 Ensure that all gates, fences, and barriers constructed on the BMGR allow wildlife access, to the extent practicable and consistent with military security, safety, and sound wildlife management.

INVENTORY and PROTECT CULTURAL RESOURCES

The BMGR contains a treasure trove of information concerning the area's occupancy and use by native peoples and Euro-American immigrants from prehistoric times to the present. The USAF, USMC and other agencies have undertaken a number of surveys and identified hundreds of important cultural sites on the BMGR. The INRMP must recognize and protect these unique resources from both damaging activities, whether they are undertaken or permitted by the DOD.

Protection efforts have not been entirely effective in the past, as the experience at Tinajas Altas indicates. There, 80% of archeological sites in open areas have been impacted by recreational vehicle traffic. See G.H. Hartmann & M.C. Thurtle, "The Only Water for 100 Miles: Tinajas Altas Archeological Survey," Vol. II (July 2000) (Final Draft Report) at 629-630. In addition, at Baker Peaks, a sensitive area being degraded by both military and civilians was fenced to protect it, but only after most of the site had been damaged. More pro-active measures are clearly needed.

We understand that while the BMGR apparently has recently completed an Integrated Cultural Resources Management Plan (ICRMP). It should be included and incorporated as part of this INRMP process.

In completing the ICRMP for the BMGR, the CMP proposes that DOD follow its guidance, as set out in Enclosure 7 to IM 4715.3. That guidance directs, among other things, that ICRMP shall include ("as appropriate") the following:

A summary of known cultural resources information and a list and brief description of properties listed or eligible for listing in the National Register of Historic Places.

Analysis of the sufficiency of the existing information on cultural resources and associated contexts to meet compliance requirements.

Information on areas that have not been inventoried and a plan for completion of the inventory.

Identification and prioritization of actions required to implement goals and objectives of the plan.

Identification of the type and location of actions that may affect cultural resources.

Procedures to ensure that actions of the installation and its tenants are planned and carried out in ways that *protect and enhance* its cultural resources.

Identification of unique cultural resource issues confronting the installation.

Preservation and mitigation strategies for threatened cultural resources.

Procedures for consultation with all interested groups and individuals that represent an interest in cultural resources.

Provisions for enforcement of cultural resource laws and regulations by professionally trained personnel.

IM 4715.3 at pp. 40-41. Other guidance in IM 4175.3 contains direction that BMGR should adopt, where applicable, in completing its ICRMP:

> [Para. 6.1.8.3.] The cultural resources inventory of archeological resources should include, at a minimum, the analysis, identification, and prioritization of all potential archeological locations on the installation and verification of the presence or absence of archeological resources in all areas that might be adversely impacted by military activities.
>
> [Para. 6.1.10.] Portions of installation real property that have significant ecological, cultural, scenic, recreational, or educational value may be set aside for conservation of those resources, where such conservation is consistent with the military mission.
>
> [Para. 6.2.5.] Areas on DOD installations that contain natural resources that warrant special conservation efforts, after appropriate study and coordination, may be designated as special natural areas. The integrated natural resources management plan for the installation shall address special management provisions necessary for the protection of each area. Special natural areas include ... traditional cultural places having officially recognized special qualities or attributes. [See also our recommendation 3.1.1 above.]
>
> [Para. 6.3.2.] At the earliest planning stage of any undertaking that might affect a cultural resource, the affected DOD Component shall start interagency consultation procedures to explain the undertaking, its area of potential effect, and a preliminary determination on whether or not the resources will be affected. Consultation shall be undertaken, as appropriate, with the Advisory Council on Historic Preservation, the State Historic Preservation Office, Federally-recognized Indian tribes and other Native American organizations and other interested organizations and individuals as provided in 42 U.S.C. 1996, 36 CFR 800, 25 U.S.C. 3001, and Section 470 aa-ll of 16 U.S.C. (references (d), (e), (u) and (h)).
>
> [Para. 6.3.4.] Consultation with Federally-recognized Indian tribes or other Native American organizations is required by law when some human remains or cultural items, as defined in 25 U.S.C. 3001 (reference (u)), or when a site of religious or cultural importance are found on DOD property. If such items are unearthed, the requirements of reference (u) must be met. The installation should consult with the tribe(s), to the extent

possible early in the planning process, and should take into account the interests of the potentially affected tribe(s) when carrying out the action.

[Para. E4.2.5.] Inventories and surveys of historical and archeological sites critical for the protection of cultural resources so that continuing actions can be modified in consultation with the Advisory Council for Historic Preservation.

In addition, the CMP would require that the INRMP/ICRMP contain the following specific standards (many of which are suggested by similar recommendations contained in the LAFR Plan, at 10-36 – 10-37):

8.1.1 Integrate the ICRMP within the INRMP.

8.1.2 Provide for archeological staff and necessary funding, as required by DOD regulations and guidance. Implement within 1 year of adoption of the INRMP/ICRMP.

8.1.3 Continue systematic Class III surveys of all areas currently impacted by military or DOD-permitted activities. Create a timeline for completion of this program. Create a Class II survey to identify significant or interesting sites that may not be located in areas currently impacted by military or DOD-permitted activities.

8.1.4 Initiate as soon as possible a program to designate eligible sites to the National Register of Historic Places.

8.1.5 Coordinate management of cultural resources on the BMGR with the cultural resource staff of Organ Pipe Cactus NM and Cabeza Prieta NWR and Wilderness.

8.1.6 Provide special protection for archeologically significant sites and surrounding areas that are being impacted by both the military and the public. Propose and adopt specific standards in the INRMP/ICRMP.

8.1.7 Minimize impact on cultural resources by locating ground-disturbing activities and new developments away from known archeological sites, preferably in already impacted areas.

8.1.8 Continue and expand an education program for military and agency personnel and, if possible, local civilian populations that will promote increased sensitivity to historic preservation.

PROHIBIT MINING and MINERAL EXPLORATION

We understand from reviewing recent BMGR documents that the USAF and/or USMC intend to begin mining sand and/or gravel on the BMGR to facilitate road maintenance and other

construction needs. We strongly oppose such proposals. First and foremost, such material is likely to come from desert washes, which, as noted above, are generally the most biologically rich areas of the Sonoran desert. These areas must be protected from mining. We strongly doubt that mining anywhere on the BMGR will facilitate progress towards achieving DFCs. Second, permitting the DOD to mine sensitive areas of the Range will put the DOD in competition with regulated, private enterprises operating off the Range. The military withdrawal of the Range, which prohibits mining by the public, should not facilitate destructive mining by the DOD.

The CMP would therefore adopt the following standard:

9.1.1 Prohibit the mining of sand and gravel by DOD or any other entity on the BMGR. Require building materials be obtained off-site. Require that off-site materials be certified, to the extent practicable, as "weed free."

In addition, the CMP would adopt the following recommendations from the LAFR Plan (at 4-31):

4-1: Keep [the BMGR] closed to geological exploration and development because of the far-reaching impacts these activities would have on the natural and cultural resources of the Range.

4-4 Develop a systematic, readily available [to the public] database containing all hydrologic, geologic, and geophysical studies conducted on [the BMGR by the time of the adoption of the 2001 INRMP].

PROTECT GROUND and SURFACE WATER RESOURCES

Given the scarcity of both ground and surface water at the BMGR, the CMP would include the following management standards for the INRMP, several of which are adapted from the LAFR Plan:

10.1.1 Prohibit both groundwater exploration and development for off-site uses.

10.1.2 Prohibit both groundwater exploration and development in, or in hydrologically connected areas that may impact water resources within, federal research Natural Areas, ACECs, SRMAs, Habitat Management Areas, riparian areas, any other special management area, and other environmentally sensitive areas where wildlife, vegetation or cultural resources might be adversely affected. [See LAFR Plan Recommendation 5-2.]

10.1.3 Limit all field activities related to ground water exploration and development to designated roadways. [See LAFR Plan Recommendation at 5-4.]

10.1.4 Prior to undertaking any ground water exploration and development, complete an environmental assessment (EA) or EIS pursuant to NEPA.

10.1.5 Ensure that all activities (individually and cumulatively) on the BMGR comply with state water quality standards, per Clean Water Act § 313, 33 U.S.C. § 1323, and all other provisions of the Clean Water Act.

[This standard is based upon a recommendation of the US Environmental Protection Agency (EPA) in its comment letter on the Draft Legislative EIS for the renewal of the BMGR withdrawal. Letter of D, Wieman, US EPA Region IX to L. Woestendieck, BMGR (Dec. 29, 1998) at 2.]

The CMP would also include the following standards contained in the LAFR Plan, with amendments in brackets:

5-5 Develop a systematic, readily available [to the public] database containing all hydrologic, geologic, and geophysical studies conducted on LAFR [by the time of the adoption of the 2001 INRMP].

5-8 Monitor [at least annually] the water table levels to determine how perimeter water use may be affecting water reserves on the Range.

15-8 Monitor all geophysical and legal aspects to ground water management for any potential changes that may impact the natural resources on LAFR.

LAFR Plan at 5-24; 15-25.

PROTECT AIR QUALITY and VISUAL RESOURCES

The CMP would adopt the following standards from the LAFR Plan (at 9-11) to protect air quality and visual resources. They are listed below, with recommended amendments in brackets.

9-1 Monitor air quality trends as documented by perimeter air quality stations. [Evaluate the impact of air pollutants generated on and off the BMGR on achievement or progress towards DFCs.]

9-2 Control excessive fugitive dust generated on heavily traveled roads and at construction sites and activity areas. [Evaluate the environmental impacts of alternative control methods prior to implementation.]

9-3 Prevent further degradation of the visual resource by confining military uses of [the BMGR] to existing land areas wherever possible.

9-4 Protect mountain vistas from visual intrusions [by prohibiting the construction of new military facilities in mountain ranges].

9-5 Protect the visual quality of lands adjacent to El Camino del Diablo recreation corridor and highways (Interstate 8 and State Route 85) [by prohibiting new ground disturbance or the erection of structures within the viewshed].

9-6 Leave errant tow targets where they have fallen unless removal methods can be found that do not damage natural and cultural resources. [Undertake an environmental assessment or EIS prior to undertaking any tow target removal project.]

PROTECT SOIL RESOURCES

Desert soils are critical to vegetation growth yet particularly fragile. One botanist has called them "the desert's immune system," because once the functioning of fragile cryptobiotic soil is disrupted, native plant communities can collapse. Soil disturbance can alter hydrology and promote invasive exotic species. Therefore, DOD will almost certainly be unable to move towards achieving DFCs without specific protection for soil resources. Other recommendations listed above, such as the prohibition on new road construction, attempt to address this concern to some degree.

However, the CMP would also adop the following requirements from the LAFR Plan:

6-1 Restrict the operation of motorized vehicles and other heavy equipment to established roadways and other previously impacted areas to protect vegetation, desert pavements, and other protective covers of soils from disruption.

6-2 Assess, as part of the site appraisals for the NEPA evaluation process (that must precede initiation of new landbased activities), the vulnerability of soils to disruption and subsequent wind and water erosion.

6-3 Update the soils map database with new information collected during site evaluations.

6-4 Using the following techniques, minimize soil disturbance and conserve soil resources where intensive use of a previously unimpacted site is required:

(i) gain access to the site by means of existing roadways;
(ii) use equipment that minimally disturbs soils (such as rubber-tired vehicles rather than tracked vehicles);
(iii) confine vehicle use to the smallest area necessary to accomplish the task at hand; and
(iv) reclaim soils as necessary and revegetate impacted sites with local, native species [within 180 days] after use has ceased.

6-5 Prohibit all land-based activities that disturb the vegetative covers of the Superstition and Rositas series, as they are especially vulnerable to wind erosions.

7-1 Give high priority to protecting vegetation from disturbances during any land-based activities.

LAFR Plan at 6-12, 7-13. We note that LAFR Recommendation 6-5 provides a basis for identifying those areas which contain the Superstition and Rositas series as "Special Natural Areas," and for adopting standards for those areas that prohibit all land-based activities.

In addition, we understand that soils and other resources may be threatened by contamination (pollution) from toxic materials. There are numerous military aircraft crash sites, sites of errant bomb drops, sites of fuel spills, etc., that may be damaging soils, as well as wildlife, water quality and other resources, and that may not have been adequately remediated because they occurred long ago. This pollution may thus damage ecosystem functioning on a local level, and may further have significant impacts cumulatively. Therefore, in order to ensure that natural resources can be managed to move towards achieving DFCs, DOD must identify, and, where possible, remedy the contamination.

The CMP would therefore adopt the following standard:

11.1.1 No later than 1 year after the adoption of the INRMP, DOD shall complete an inventory of the BMGR to locate sites of potential hazardous waste pollution and/or toxic releases outside of the TAC ranges. No later than 3 years after completion of the INRMP, DOD shall complete and make available to the public, a report recommending how to fully remediate and/or otherwise address the threats posed by pollution at the inventoried sites in order to move the contaminated areas toward DFCs. No later than 5 years after completion of the INRMP, the DOD shall have taken the recommended steps to address the threats of pollution, consistent with laws and INRMP standards meant to protect the environment.

IMPROVE COORDINATION with NON-MILITARY AGENCIES to ENHANCE ECOSYSTEM MANAGEMENT

While CMP outline contains numerous suggestions that reflect an ecosystem management approach, there are several opportunities for improved interagency cooperation that the Plan should address as well.

I. ***Improve the Interagency Executive Committee.***

The BMGR has several methods for coordinating with non-military agencies, including the Goldwater Partners forum and the "Barry M. Goldwater Range Executive Committee" or BEC. We have criticized the latter group on several occasions for its failure to permit public

oversight, participation and review. We continue to believe that BEC meetings should be, at a minimum, open to the public.

The MLWA includes provisions requiring the creation of an intergovernmental executive committee much like the BEC. MLWA of 1999, Sec. 3031(b)(6). The MLWA will require one important change to the BEC that we support, namely the participation of tribal representatives. MLWA of 1999, Sec. 3031(b)(6)(A) and (C).

The CMP would include the following standard in the INRMP:

12.1.1 The relevant agencies shall hold Goldwaters Partners meetings, BEC meetings, and other intergovernmental executive meetings at least quarterly. All such meetings will be open to the public, provide an opportunity for public input, and the public shall be provided notice of such meetings at least 45 days in advance. Minutes of such meetings shall be made available to the public.

II. ***Protect the Cabeza Prieta NWR and Wilderness.***

Military actions on the BMGR can and do have impacts beyond the Range. For example, military exercises sometimes result in the closure of certain roads that provide access to Cabeza Prieta NWR. Impacts from noise, visual impacts, impacts to air and water rarely halt at jurisdictional boundaries. Wildlife travels freely between the Range and the Refuge. Given the highly protected status of the Cabeza Prieta NWR and Wilderness, military actions which may affect the Refuge must be analyzed and should be mitigated wherever possible.

The CMP would therefore adopt the following standards in the INRMP:

12.2.1 DOD shall analyze in all NEPA review documents the potential to impact the resources of the Cabeza Prieta NWR and Wilderness. Where impacts are likely to occur, DOD will make all efforts to eliminate those impacts. Where elimination of impacts to Cabeza Prieta NWR and Wilderness is not feasible, mitigate the impacts to the maximum extent possible, and monitor the effects.

12.2.2 Prohibit any new military activities involving ground disturbance to the Cabeza Prieta NWR and Wilderness, unless such actions are deemed necessary by the US Fish and Wildlife Service to protect Refuge resources, and comply with all other environmental laws.

In addition, as DOD is aware, Cabeza Prieta NWR and Wilderness is now in the process of preparing a comprehensive conservation plan (CCP) for management of its lands. DOD and FWS, to the extent their differing management requirements permit, should coordinate on monitoring protocols and other issues that transcend jurisdictional boundaries.

III. ***Address Illegal Immigration.***

An emerging threat to BMGR natural and cultural resources is the increase in the number of illegal aliens crossing the Range. Illegal aliens may take routes across the BMGR that place them in jeopardy, or that jeopardize military activities. Illegal aliens may also not display great concern for compliance with environmentally protective standards, since their use of the Range is usually to get across it however they can. Their numbers have increased dramatically in recent years as the Border Patrol has increased enforcement resources at other locations.

The INRMP needs to address the impacts of illegal alien crossings to natural and cultural resources and identify effective ways to mitigate such impacts. We recommend a complete discussion of the issue in the EIS and INRMP. The CMP would also require the following standards be adopted in the INRMP.

12.3.1 The DOD shall, in consultation with the Department of Justice, Immigration and Naturalization Service, CP NWR, OPCNM, and other interested agencies, prepare a report not later than 180 days after completion of the INRMP which shall address the following aspects of illegal immigration across the BMGR:

(a) the nature and extent of illegal immigration across the BMGR;

(b) the impacts to the military mission, and to natural and cultural resources, of such immigration;

(c) the nature and extent of current efforts to limit illegal immigration across the BMGR, and the nature and extent of efforts to apprehend or rescue illegal immigrants or those transporting them;

(d) proposed methods for further mitigating or eliminating impacts to the military mission, and to natural and cultural resources of such immigration, including recommendations as to which such methods should and can be adopted; and

(e) opportunities for improved coordination with the Border Patrol and other law enforcement agencies.

The BMGR shall present the report to the public and other agencies at the next meeting of the intergovernmental executive committee after the report is completed. The BMGR shall then propose to amend the INRMP to address the recommendations within 1 year of the adoption of the INRMP.

12.3.2 The INRMP shall establish standards for monitoring the nature, extent, and impacts of use by all BMGR users or visitors, including illegal immigrants.

DOD should be aware that the Department of Justice has initiated a programmatic environmental review of proposal to increase the effectiveness of Border Patrol operation in and around the BMGR. The scoping period on the proposal ended on October 31, 2000. The BMGR should work with the Department of Justice to address the issues of concern discussed above and to identify cumulative impacts to BMGR resources that may occur from Border Patrol activities.

IV. ***Adopt LAFR Plan Recommendations (as Amended) to Improve Inter-Agency Communication, Cooperation and Planning.***

Finally, the CMP would adopt several of the recommendations proposed in the LAFR Plan, at 13-11 – 13-12, that are designed to improve inter-agency communication, cooperation and planning. We urge their adoption into the INRMP. They are listed below, with recommended amendments in brackets.

13-2 Provide all field personnel with agency contact lists for reporting observations of unlawful incidents, resource impacts, unusual wildlife or vegetation observations, cultural resource finds and/or disturbances. Document observations and send the reports to the resource staff at Luke AFB [and/or MCAS Yuma] or the appropriate law enforcement agency.

13-3 Provide … flexible access periods to the Range for natural resource agencies in order that they may implement long-range and immediate management objectives.

13-4 Keep LAFR agencies updated on status, location, and boundaries of specially designated areas ….

13-5 Provide information [as needed to protect resources, and on a regular basis, but no less than quarterly] to all LAFR agencies about known federally designated endangered and threatened species, and state special element species that inhabit the Range. The USFWS and AGFD have the primary responsibility for updating candidate and recognized species lists, and educating other LAFR agencies.

13-6 Provide information to all LAFR agencies [as to the general location of significant or potentially significant] archeological sites so that the agencies can minimize activities [and impacts] in those areas. (These locations are not for public dissemination.)

13-7 Request all agencies to [regularly] monitor other agency and public activities on the Range and advise the resource management staff (with documentation) of the impact such activities may be having on the natural and cultural resources, particularly if the activities are unwarranted or within specially designated or protected areas.

13-8 Keep all LAFR agencies updated about federal and state regulations, laws, and acts that are written specifically to protect natural and cultural resources, and see that the requirements of such regulations, laws and acts are properly followed.

13-9 Provide updated versions of USFWS manuals and plans [including any plan for the management of Cabeza Prieta NWR] and AGFD management policies and plans to the resource management staff at Luke AFB [and/or MCAS Yuma].

13-10 Acquire from the U.S. Border Patrol, U.S. Customs Service, county sheriff's, and Department of Public Safety operations manuals for the resource management staff; update manuals annually.

ENDORSEMENTS of the OUTLINE for a CONSERVATION MANAGEMENT PLAN

The CMP outline is endorsed by the following groups:

Friends of Cabeza Prieta (FOCP) is an alliance of scholars, desert rats, business people, hikers, artists, and citizens who support the CPNWR and the Sonoran Desert through advocacy, service, research, and education. Based in Arizona's Pima County, FOCP has a national membership, and it was instrumental in passage of the 1990 Desert Wilderness Act. Contact: Gayle Hartmann, FOCP, 2224 E. 4th Street, Tucson, AZ 85719 (tel) (520) 325-6974 (email) GayleH@ix.netcom.com.

The Land and Water Fund of the Rockies (LAW Fund) is an environmental law and policy center serving the Rocky Mountain and Desert Southwest region. The LAW Fund has represented conservation groups interested in protecting the Sonoran desert, including the BMGR, since 1995. Contact: Ted Zukoski, LAW Fund, 2260 Baseline Road, #200, Boulder, CO 80302 (tel) 303-444-1188 x213 (email) tzukoski@lawfund.org.

The Southwest Forest Alliance (SWFA) is a coalition of over 50 environmental groups from Arizona and New Mexico charting a new course for the Southwest's eleven National Forests. Dedicated to restoring a natural balance to our public lands, the Alliance promotes solutions which will protect old growth forests and restore damaged watersheds while helping forest dependent communities to become self-sustaining. SWFA and its member groups also have a longstanding interest in the protection of the Sonoran desert. Contact: Kim Crumbo, SWFA, P.O. Box 1033, Grand Canyon, AZ 86023 (tel) 520/638-2304 (email) Kcrumbo@swfa.org.

The Wilderness Society (TWS) is a national not-for-profit membership organization devoted to preserving wilderness and wildlife; protecting America's forests, parks, rivers, and shorelands; and fostering an American land ethic. TWS has a long-standing interest in the management of lands in the Sonoran desert, particularly the lands of the Cabeza Prieta National Wildlife Refuge and Wilderness (the largest Fish and Wildlife Service-administered wilderness in the lower 48 states) and those of the adjacent Goldwater Range. Contact: Pam Eaton, Regional Dir., TWS, 7475 Dakin Street #410, Denver, CO 80221 (tel) 303-650-5818 x103 (email) pam_eaton@tws.org OR Jim Waltman, TWS, 1615 M Street NW, Washington, DC 20036 (tel) 202-429-2674 (email) jim_waltman@tws.org.

REFERENCES

Amor, R.L. and P.L Stevens. 1976. Spread of Weeds form a Roadside Into Sclerophyll Forests at Dartmouth, Australia. *Weed Research* 16:111-116.

BLM, Goldwater Amendment to the Lower Gila South RMP (1989) at 20-25; BLM, Goldwater Amendment Record of Decision (Nov. 13, 1990).

BLM, Lechuguilla-Mohawk Draft Habitat Management Plan (HMP) (1997)

Buckley, R. and J. Pannell. 1990. Environmental Impacts of Tourism and Recreation in National Parks on Conservation Research. *Journal of Tourism Studies* 1:24-32;

Cole, David N.; Dalle-Molle, John. 1982. Managing Campfire Impacts in the Backcountry. Gen. Tech. Rep. INT-135. Ogden, UT. U.S.D.A Forest Service, Intermountain Forest and Range Experiment Station. 16 p.

Cole, David N. 1983. Campsite Conditions in the Bob Marshall Wilderness, Montana. Res. Pap. INT-312. Ogden, UT. U.S.D.A. Forest Service, Intermountain Forest and Range Experiment Station. 18 p.

Davidson, Diane W., William D. Newmark, Jack W. Sites, Jr., Dennis K. Shiozawa, Eric A. Rickart, Kimball T. Harper, and Robert B. Keiter. 1996. Selecting Wilderness Areas to Conserve Utah's Biological Diversity. *Great Basin Naturalist* 56(2):95-118.

Eakle and Smith, "Rare Plant Survey of the BMGR," (Sep. 1988).

Environmental Defense Fund, "Defending the Desert," (1995).

T. Fleischner, "Ecological Costs of Grazing in Western North America," Conservation Biology, Vol 8, No. 3, 629 (Sept. 1994).

FWS, Final Programmatic EA and Draft Comprehensive Conservation Plan for Cabeza Prieta NWR (Sept. 1998).

FWS, Draft Kofa National Wildlife Refuge and Wilderness Management Plan (1997).

Hendee, John C.; Stankey, George H.; Lucas, Robert C. 1990. Wilderness Management. 2nd., Rev. 546 p.

Huffman, Jim. 1993. Between River and Rim: A Comparitive View of Subsistence Systems in Grand Canyon National Park, AZ. Copy on file, Grand Canyon National Park Science Center.

Ketcheson, Gary L., and Walter F. Megahan. 1996. *Sediment Production and Downslope Sediment Transport From Forest Roads in Granitic Watersheds*. Research Paper INT-RP-486. Ogden, UT: U.S. Department of Agriculture, Forest Service, Intermountain Research Station.

Marshall, R.M., et al. (2000). *An Ecological Analysis of Conservation Priorities of the Sonoran Desert Ecoregion*. Prepared by The Nature Conservancy Arizona Chapter, Sonoran Institute, and Instituto del Medio Ambiente y el Desarrolla Sustentable del Estado de Sonora with support from the Department of Defense Legacy Program, Agency and Institutional partners. 146 pp.

Mech, L.D.; S.H. Fritts; G.L Raddle; and W.J. Paul. 1988. *Wolf Distribution and Road Density in Minnesota.* Wildlife Society Bulletin 16:85-87.

Moll, Jeffrey E. 1996. *A Guide for Road Closures and Obliteration in the Forest Service*. San Dimas, California: U.S. Department of Agriculture, Forest Service, San Dimas Technology and Development Center. 49 pages.

Noss, Reed. 1995. The Ecological Effects of Roads. *Road-Ripper's Handbook*. Missoula, Montana: Wildlands CPR. Pages 11-20.

Reed , Rebecca A., Julia Johnson-Barnard, and William L. Baker. 1996. Contribution of Roads to Forest Fragmentation in the Rocky Mountains. *Conservation Biology* 10(4):1098-1106.

Thiel, R.P. 1985. Relationship Between Road Densities and Wolf Habitat Suitability in Wisconsin. *American Midland Naturalist* 113:404-407.

Trombulak, Stephen C., and Christopher A. Frissell. 2000. Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities. Conservation Biology 14(1):18-30.

Turner and Schwalbe, "Reptile and Plant Inventory of the Mohawk Dunes," (Apr. 15, 1997).

B. Tunnicliffe et al., "Natural Resource Management Plan for Luke Air Force Range," (Nov. 1986).

USMC, Yuma Training Range Complex Draft EIS (1998).

USN, TACTS Range Upgrade Final EA (Aug. 1996).

D. Wieman, US EPA Region IX. Letter to L. Woestendieck, BMGR (Dec. 29, 1998).

TABLE OF EXHIBITS

Exhibit 1.	S. Cornelius et al., "Building the Case for Ecosystem Monitoring in the Sonoran Desert," (May 2000) (4 pp.).
Exhibit 2.	FWS, Final Programmatic EA and Draft Comprehensive Conservation Plan for Cabeza Prieta NWR (Sep. 1998), Map #8.
Exhibit 3.	"Off-Highway Vehicle Impacts on Desert Ecology: Reference List."

May 5, 2003

Barry M. Goldwater Range
P. O. Box 67132
Phoenix, AZ 85082-7132

Overnight Mail Delivery

Re: Integrated Natural Resources Management Plan COMMENTS

Enclosed are letters regarding a plan for the Cabeza Prieta National Wildlife Refuge portion of the BMGR. These are from the Yuma Natural Resource Conservation District, the Laguna Natural Resource Conservation District (both organized under State law) and the Yuma Conservation Garden, Inc.

These communications clearly show and justify the absolute need for land managers to enter all areas to inventory habitat conditions and maintain facilities necessary for balanced wildlife survival. Though the letters are directed to comment toward management of the CPNWR, the basic premise of proper resource stewardship clearly is ACCESS. 1.10

As you are well aware, the Wilderness portion(s) of the Refuge are required to be "overly protected" by the legislative designation in 1990. We now see the endangered Sonoran Pronghorn Antelope herd reduced from approximately 120 animals in 2001 to approximately 31 or fewer. Drought caused much stress on the herd which could have been partially prevented by allowing agency or volunteer people to enter and aid the situation by attending water facilities. 2.4

My garden club has worked closely with the 28 acre Yuma Conservation Garden, Inc. to help promote sound understanding of comprehensive resource management in their State designated Conservation Education Center. Their facility is sponsored by the two NRCD's (above) and hosted over 4000 student and adult visitors last year.

Obviously, the responsible, knowledgeable, local people involved in resource issues and promoting sound stewardship recognize the necessity to use common sense and the need to permit appropriate treatment on the Range. Of course, the military mission must take precedence with safety of everyone being paramount. 2.4

Please consider these comments when preparing stipulations and regulations for comprehensive management of all public lands.

Thank you very much. Valenia A. Colvin, Pecan Grove Garden Club

Copy: Yuma NRCD; Laguna NRCD; Yuma Cons. Garden, Inc

Yuma Natural Resource Conservation District
2450 S. 4th Ave., #402 - Yuma, Arizona 85364 - Phone (602) 726-5562

January 27, 2003

John Slown
Cabeza Planning Team Leader
U.S. Fish & Wildlife Service
P. O. Box 1306
Albuquerque, NM 87120

Dear Mr. Slown:

Our NRCD Long-Range Program for Natural Resource Conservation and Development shows that a Memorandum of Agreement with the Secretary of Interior developed in 1965 sets up cooperative relationships with agencies within the Department, including those dealing with all resources.

Wildlife concerns are included in our Biannual Work Plan 2002-2004. Objective IV specifies actions for Wildlife Habitat:

a. Water Hole Project/Partnerships with applicable agencies and organizations
b. Creating Wildlife Habitat Areas
c. Identify areas for future habitat development
d. Represent YNRCD on Yuma Habitat Council
e. Investigate funding sources.

These concerns are assigned to be in concert with various agencies, organizations and individuals. Objective V-Area Planning shows the Need to offer conservation requirements in wilderness. We expect to continue to monitor minimum requirements for wildlife management in wilderness with local groups and agency personnel.

The listed alternatives provided in your program indicate the need for more attention being afforded to ability of land managers and game management. As stated above, we are concerned with the monitoring of wildlife habitat and populations.

The current drought has intensified the need for water assistance to all wildlife in the Sonoran Desert. We believe (as stated in Objective IV/Work Plan) that provision for maintenance, supplementing, and installation of additional facilities should be given priority. The Desert Bighorn Sheep and Sonoran Pronghorn Antelope are the leading benefactors of intensified management, but all wildlife will benefit by improving the availability of water.

We would opt for relaxing some of the restrictions imposed which prevent Refuge managers and the general public from providing improved conditions to benefit the environment.

Thank you for the opportunity to speak about our concerns.

Yours truly,

Mark Kuechel
Chairman, Yuma NRCD

Cc: Lenore Stewart, Chair Yuma County Board of Supervisors
John Fugate, President, Yuma Valley Rod and Gun Club.

Laguna Natural Resource Conservation District
2450 S. 4th Ave., #402 - Yuma, Arizona 85364 - Phone (602) 726-5562

January 27, 2003

John Slown
U.S. Fish & Wildlife Service
P.O. Box 1306
Albuquerque, NM 87120

Dear Mr. Slown:

Part of Cabeza Prieta national Wildlife Refuge is located in Yuma County. Our Conservation District members are interested in land administration and natural resource management in the area.

Review of the alternatives presented for a comprehensive plan and environmental impact statement indicate that possible increased management for wildlife concerns is a desirable option. Forage and water are not in abundance under natural conditions and relief to the present drought emergency cannot be given under current restrictions.

We expect that more intense effort to provide habitat improvement would be beneficial if imposed administrative restrictions were relaxed substantially.

We appreciate your concern and cooperation.

Yours truly,

Hank Czajkowski
Chairman, Laguna NRCD

Cc: Janet Napolitano, Governor
Johnny Lavin, President, AACD

Yuma Conservation Garden, Inc.

January 27, 2003

John Slown
U.S. Fish & Wildlife Service
P.O. Box 1306
Albuquerque, NM 87120

Dear Mr. Slown:

Part of Cabeza Prieta national Wildlife Refuge is located in Yuma County. The Yuma Conservation Garden Board is interested in land administration and natural resource management in the area.

Review of the alternatives presented for a comprehensive plan and environmental impact statement indicate that possible increased management for wildlife concerns is a desirable option. Forage and water are not in abundance under natural conditions and relief to the present drought emergency cannot be given under current restrictions. We have assisted in building drinkers and have witnessed the improvement of water availability even under drought conditions. The new drinkers require minimum maintenance.

Monitoring of flora and fauna is important. Invasive species are a threat the ecosystem. There will always be a need to enter the Cabeza Prieta.

At the Yuma Conservation Garden we teach respect for the land along with math and science. The love of our natural spaces is not learned by not being allowed to visit open areas.

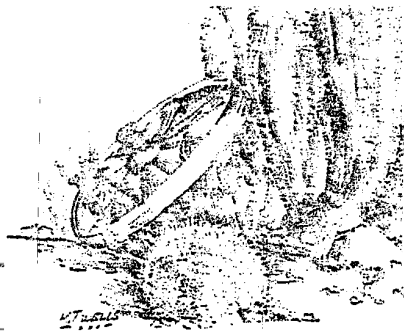
We expect that more intense effort to provide habitat improvement would be beneficial if imposed administrative restrictions were relaxed substantially.

We appreciate your concern and cooperation.

Yours truly,

Bruce Paulsen
Chairman,
Yuma Conservation Garden, Inc.

Cc: Janet Napolitano, Governor
Johnny Lavin, President, AACD



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Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

April 23, 2003

Barry M. Goldwater Range
INRMP
Draft EIS
PO Box 67132
Phoenix, AZ 85082-7132

To Whom It May Concern:

On behalf of the Executive Committee and 12,000 thousand members of the Grand Canyon Chapter of the Sierra Club, I wish to comment on the Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan.

We appreciate the fact that protection of natural and cultural resources, and sustainable use by the public, are important components of this plan. However, we do not see in the plan the detailed management guidelines that will be necessary to protect resources for the long term.

Overall, some positive actions are briefly described, especially in Alternative D, but the DEIS lacks specifics. Of particular importance, it lacks detailed monitoring plans, time lines, budgets, and consequences if portions of the plan are not followed. These are critical components of a successful management plan, and their absence does not instill confidence that this plan's goals will be achieved. 11.1

That said, we wish to comment on several specific issues.

Under no circumstances should there be a blanket approval of driving in washes. In this arid ecosystem, washes are among the most important areas for plants and wildlife. Besides being corridors, they are where the vegetation is concentrated. Vehicles in washes, especially where they enter and leave washes, cause direct harm to wildlife and long-term degradation of their habitat. If driving in washes is permitted, then washes become part of the road network for the Range. The plan does not suggest any attempt to inventory washes and thus has no baseline for what could be a huge proliferation of damaging, redundant roads. The best and simplest solution is to keep vehicles out of washes. 1.2 1.22 2.58

We support fewer roads, not more. Over the last 25 years or so, there has been an enormous increase of roads, many of which are completely redundant. Specifically, those roads that damage or threaten sensitive plant, wildlife, cultural, or scenic areas must be closed. The plan should include directives to rehabilitate unneeded roads and damaged areas. It should also limit driving to roads that are signed "open," in addition to prohibitions on using those that are signed "closed." 1.7 1.9 1.10 1.13 1.28

We support the concept of closing roads to increase the size of roadless areas. We appreciate the fact that large roadless areas still exist on the Goldwater Range and emphasize that they are critically important to habitat health. In particular, some wildlife species benefit from them. These include Sonoran pronghorn, desert bighorn sheep, and mountain lion, all species of concern on the Goldwater Range. In addition, it is important for this plan to recognize that the wilderness qualities of large, roadless areas are important for a large proportion of recreational users. 1.9 1.11 2.60

The plan should include explicit protections for cultural sites, both prehistoric and historic. These are important parts of our national heritage, and their protection should be integrated with that of the natural resources. We understand that there is a parallel planning process that deals with cultural resources, but it would be wise for the results of these two planning efforts to be made public together. 14.1

Because many important issues are not addressed in this document, it is difficult to wholeheartedly support any alternative. For example, specific information about funding and staff, clear management goals, time lines, consequences, and the cumulative effects of legitimate uses is missing. In addition, the enormous damage from illegal uses of the Range is not discussed at all. Having said that, by and large, Alternative D is the more reasonable, prudent, and sustainable option in this plan. We support Alternative D and encourage you to expand it with the explicit details needed to make this a functional plan. 11.1 11.16 7.4 1.7 11.9

Thank you for your time and consideration.

Sincerely,

Jim McCarthy
Chapter Chair

TUCSON AUDUBON SOCIETY

Audubon Nature Shop

300 E. University
#120
Tucson, Arizona
85705

520/629-0510

conservation

education

recreation

May 6, 2003

Barry M. Goldwater Range INRMP
PO Box 67132
Phoenix, Arizona 85082-7132

Re: Barry M. Goldwater Range Public Management Plan

To Whom It May Concern:

Thank you for providing the opportunity for public comment on the Barry M. Goldwater Range Public Management Plan. Tucson Audubon Society is happy to provide input related to the preservation of the rich habitat in this region. The Goldwater Range is important for many desert species as it contains some of the best and largest intact portions of the Sonoran Desert, with individual roadless areas as large as 95,000 acres. After 60 years of use by our country's Air Force and Marines, about 85% of the Range remains ecologically undisturbed. This is an impressive record and can be largely attributed to the exclusion of commercial uses such as livestock and mining, and the limitation of recreational uses. The biggest threats to wildlife and native vegetation currently come from growing recreational use and illegal immigrant activity. 2.52

The proposed management alternatives A through D vary widely in terms of the treatment of recreational use. We feel that those limitations that make the most sense in terms of the safe and effective operation of a military installation also provide the most protection for wildlife. For these reasons, Tucson Audubon Society strongly recommends that alternative D be adopted. One of the most important aspects of this alternative is the prohibition on driving in washes. Vehicles in washes harm wildlife and habitat. Because the plan does not attempt to inventory washes, it creates the possibility that any wash could become a legal road. Both for reasons of safety and control, and for the benefit of wildlife, Tucson Audubon Society would like to see fewer roads on the Range, not more. Driving should be limited to roads that are signed "open". Those that are not needed for official missions should be closed, along with those that damage or threaten sensitive plant, wildlife, cultural, or scenic areas. These areas should then be rehabilitated so that further erosion and illegal use are prevented. 1.2 1.7 1.9 1.10 1.13 1.22 11.9

Considering the enormous damage from illegal uses of the Range, the lack of funding and staff, the cumulative effects of legitimate uses, the variables of climate, and the military mission, we would like to reiterate our support for Alternative D. This is the only reasonable option provided in the plan. In addition it will be important for the plan to establish detailed monitoring plans, time lines, budgets, and goals, so that consequences both for military operations and for wildlife can be tracked. 7.4 11.1 11.9

Thank you again for the opportunity to comment. If you have any questions please feel free to contact me at (520) 622-5622.

Sincerely,

Sonja Macys
Executive Director

YUMA AUDUBON SOCIETY
P.O. BOX 6395
YUMA, ARIZONA 85366-6395

May 6, 2003

BMGR INRMP
P.O. Box 67132
Phoenix, Arizona 85082-7132

Ladies and Gentlemen:

The Yuma Audubon Society submits the following comments on the *Barry M. Goldwater Range Draft Environmental Impact Statement and Proposed Integrated Natural Resources Management Plan* (referred to hereafter as "the Plan" or "Plan").

Legal and Administrative Framework

The legislation withdrawing the Goldwater Range, the Military Lands Withdrawl Act of 1999 (P.L. 106-65) provides at Sec. 3031(b)(3)(E) that the plan shall "include provisions for proper management and protection of the natural and cultural resources of such lands, and for sustainable use by the public of such resources to the extent consistent with the military purposes for which such lands are withdrawn and reserved . . . ." The Sikes Act (16 USC 670) confirms these requirements in different language at Sec. 670a(a)(3)(A-C) and adds at (A) the requirement to provide for "the . . . rehabilitation of natural resources on military reservations[.]" Thus, while managing for protection of natural and cultural resources and rehabilitation of natural resources is mandatory ("shall" is used), public use may occur only if it is **sustainable** in relation to the environment, and only if it is **consistent** with the military mission. Whereas protection and rehabilitation of resources is a given, any proposed recreational use of the range faces the two tests of sustainability and compatibility. This is important to realize as people make their requests for various types of recreation on the Goldwater Range. We also note that DoD Instruction 4715.3 "provides that management under the Sikes Act should emphasize ecosystem rather than single species management principals [sic] and that public use must be compatible with ecosystem sustainability." (Plan, p. 3-6). 11.7 11.18

Alternatives A and B Should Be Rejected

Although the Plan claims that all alternatives are consistent with the Military Lands Withdrawl Act of 1999 (MLWA) and the Sikes Act (p. 3-2), we fail to see how Alternatives A and B, if implemented on the Goldwater Range, would "provide for proper management and protection of its natural and cultural resources (which is to include natural resource conservation and rehabilitation)" and "provide for sustainable multipurpose public access and use of the range consistent with the requirements of its military purposes" (p. 3-2). These alternatives both propose to leave open hundreds of miles of redundant and unnecessary roads. Alternative B, in fact, contemplates opening even more roads for public use! Both Alternatives should be rejected because they fail to provide the level of management required by law for the Goldwater Range. 11.24

Another reason Alternatives A and B should be rejected is their failure to provide for ecosystem management, which is expected by DoD Instruction 4715.3. According to the Plan (p. 3-3), with Alternative A, "Existing wildlife management practices would also continue and there would be no defined shift in emphasis towards ecosystem management methods." With Alternative B, ". . . its focus would be on resource-specific monitoring, targeted wildlife management actions (such as continued development and maintenance of wildlife waters), and basic compliance with regulatory requirements." Yet by failing to implement ecosystem management, Alternative B fails to meet even the most basic principles of ecosystem management.

Related to this, the Plan should list incidents in which public activities, including trespass, have forced military missions to be called off. 5.4

Vehicle Access and Vehicle Ways

We support the Plan proposal to close roads which have been identified as redundant and no longer needed for military purposes. However, we encourage you to close all 765 miles of road that were so identified (Alternative D). This will protect the environment at the level envisioned by law and administrative act. 1.7 We also support the proposed Plan element that closes all washes to vehicles unless they are part of a designated route and support the provision of the plan that closes all routes unless they are designated as open by the plan. 1.2 If routes must be signed in order to be open, this will decrease confusion on the part of the public as to which routes are open and also should prolong the life of signs marking routes. 1.13 We also support the proposed ban on off-road travel. Off-road travel results in significant impacts to the environment. There are already impacts to the Goldwater Range from military and Border Patrol vehicular activities. Allowing public off-road travel might be enjoyable to individuals, but it would exacerbate vehicle impacts and fail to meet the management requirements of MLWA and the Sikes Act, especially the requirement to conserve and rehabilitate natural resources. 1.21 For similar reasons, we support the Plan proposal to limit camping to a corridor fifty feet from roads. 3.2

We support the Plan proposal to manage roadless areas of 3000 acres or more as roadless and for conservation and appreciate your concern for these areas. Inasmuch as you are proposing to ban off-road travel, all roadless areas of any size should be kept roadless. Wildlife and vegetation need substantial undisturbed areas in order to reproduce and subsist successfully. 1.9

Special Management Areas

We also support redesignation of the Flat-tailed Horned Lizard Habitat Management Area and redesignation of the Areas of Critical Environmental Concern that were established when the Bureau of Land Management was managing natural resources on the Goldwater Range. These ACECs are the Mohawk Mountains and Sand Dunes ACEC, Tinajas Altas (High Tanks) Mountains ACEC, and Gran Desierto Dunes ACEC. We also advocate continued protection and designation for the Sentinel Plain Lava Flow Special Resource Management Area and Crater Range Special Resource Management Area. However, these areas need more specific management prescriptions than the Plan proposes. The management prescriptions of the Goldwater Amendment plan should be incorporated into the Plan. 9.2 9.3 9.4

Resource Monitoring and Implementation Schedule

We support the Plan's proposal for a monitoring plan, but only with the provision that key indicators be truly representative of the ecosystem on the Goldwater Range, and urge implementing corrective actions before measures of resource degradation hit critical values. However, we were surprised to find no specific monitoring plan in the Goldwater Plan document. While we realize that the Bureau of Land Management (BLM) operates under a different planning framework (FLPMA), nevertheless it is instructive to note that BLM has been providing monitoring plans as part of its draft management plans/environmental impact statements. See, for example, the *Draft Northern & Eastern Colorado Desert Coordinated Management Plan and Environmental Impact Statement* (U.S. Department of the Interior, Bureau of Land Management, California Desert District and California Department of Fish and Game, Inland, Deserts, and Eastern Sierra Region, 2001), Chapter 5, and the *Draft Imperial Sand Dunes Recreation Area Management Plan (RAMP)* (U.S. Department of the Interior, Bureau of Land Management, El Centro Field Office, 2002), Appendix 1. These plans also include a detailed implementation schedule of plan actions including a budget. The Goldwater Plan should include both a monitoring plan and a detailed implementation schedule (with budget) of plan actions under all alternatives. The public should also have an opportunity for scoping and comment on the monitoring plan and implementation schedule before they are adopted. 13.7 13.1 11.1 11.13

In addition, it is obvious from the gaps in information about the resources of the Goldwater Range that more inventory work needs to be done on natural and 13.8

cultural resources. This should be part of the implementation schedule and funds should be budgeted for the inventories. This should also be included in the Plan. 13.8

Wildlife, Vegetation, and Recreation

We support the elimination of non-game species collection (this isn't in the proposed plan). This will hopefully reduce harassment of many animal species and will keep the gene pool healthy, as collectors tend to go for "trophy" specimens. We also support the Plan proposal to prevent the public from entering mines on the Goldwater Range both to protect bats and to promote public safety. We also support the Plan proposal to ban collecting dead and down wood in management areas 1, 4, 5 and 7, but in addition recommend a ban on collecting dead and down wood in special management areas, such as Areas of Critical Environmental Concern, Habitat Management Areas, and Special Resource Management Areas. 2.35 2.55 5.1 3.5

Recreational (Non-Hunting) Shooting

The Plan apparently proposes to allow virtually unrestricted recreational (non-hunting) shooting on the Goldwater Range in areas open to the public, including even automatic weapons and shooting at night if a permit is obtained for the latter two activities. The danger and noise of this activity is inconsistent with public safety, especially the use of automatic weapons and night shooting. Unsuspecting persons could venture into an area where shooting is occurring and be exposed to a hazardous situation. Persons shooting at night could be unaware of other parties of persons in the area. The Plan should include any information on incidents where recreational shooting has affected military missions, Border Patrol activities, or the public on the Goldwater Range. There are other more appropriate areas outside the Goldwater Range (such as demarcated shooting ranges) where non-hunting shooting should be confined. Automatic weapons and night shooting areas need to be clearly defined in order to provide for public safety. 6.1 6.3 6.1

Area Service Highway

For a variety of reasons, which are detailed below, if the Plan is going to address the Area Service Highway, it should oppose construction of the Area Service Highway through the Goldwater Range. This limited access road, which will travel east from San Luis until it reaches the Goldwater Range and then turn north is a clear case of encroachment on a military reservation. Supporting a high-speed highway through an area that is currently closed to the public does nothing to further the military purposes for which the Goldwater Range was established. In fact, it is a threat to these purposes. In addition, it does nothing to further recreation by the general public—or at least it's not supposed to. If the public is excluded or discouraged from using the highway because it is intended for trucks traveling from Mexico to I-8, it will serve no recreational purpose. On 12.1

the other hand, if the public is encouraged to use the road, it will only compound the encroachment on the Goldwater Range. Once the road is built, there will be pressure to open up the Goldwater Range to more development and eventually, pressure to sever the highway from the Goldwater Range.

The Area Service Highway would run very close to a rifle range and the Cannon Air Defense Complex. Looking at Plan Figure 2-2 ("Current Military Airspace and Land Use Features of BMGR-West"), the highway would come within three miles of an EOD Operating Area and six miles of a Live Ordinance Jettison Area. There are also two target complexes (Cactus West and Moving Sands) within less than fifteen miles from the highway. Unfortunately, on April 12, 1992, two Harrier jets crashed to the ground just inside the Goldwater Range and two miles from Foothills homes ("Too Close for Comfort: Crash of Jets Near Homes Shows Danger of Building Near Military Range: MCAS," *The Yuma Daily Sun*, April 15, 1992, pp. 1,9.) According to the article, "Numerous residents traveling in dune buggies and ATVs tried to find the crash sites after dark Monday after the accident received news coverage, the sergeant said." A high-speed, paved highway would only increase the number of curiosity-seekers if a similar event were to occur. The Area Service Highway would cross the Range along most of its western boundary, exposing the traffic using it to a hazardous potential if there were an airborne mishap, such as intentional or unintentional jettisoning of armaments (whether live or not). 12.1

The impacts of the Area Service Highway on the Flat-tailed Horned Lizard also make it contradict ecosystem management. 2.51

The draft environmental assessment for the Area Service Highway has not yet been released. It seems premature for the Plan to approve a right-of-way for the road across the Goldwater Range (it is, unfortunately, supported in the Preferred Alternative/Proposed Action) before there has been an opportunity for the Goldwater Plan's lead agencies to evaluate the NEPA compliance documents associated with it. 12.1

For all these reasons, the Area Service Highway route across the Goldwater Range should be rejected, as Alternative D does.

Conclusion

The Military Lands Withdrawl Act of 1999 makes it clear that the Goldwater Range is not just another area of public land. It has been withdrawn from public entry for specific military purposes, and the military have been given the responsibility for protectively managing the natural and cultural resources of the Goldwater Range. That this protective resource management responsibility is to be taken seriously is apparent from MLWA at Sec. 3031(b)(7), in which the Department of Interior could seize resource (but not military) management responsibility and ultimately prepare a resource management plan under FLPMA

provisions. This would occur if management under the INRMP were allowing "significant and verifiable degradation of the natural and cultural resources."

Under MLWA, public use is allowed only to the extent that it does not impair the sustainability of resources and the military purposes defined in MLWA. It is therefore not unreasonable to manage the Goldwater Range for a higher level of resource protection than might be expected on some areas of public lands. As the Plan states on p. 1-4, ". . . the range is a principal component in the largest relatively unfragmented remaining tract of Sonoran Desert." Significant areas of the Sonoran Desert face unprecedented pressures for development into urban areas. That is why it is so important to manage the Goldwater Range for its natural and cultural resources values, consistent with the legally defined military mission. The Preferred Alternative/Proposed Action takes many significant steps in this direction, but overall we believe that Alternative D would better meet the spirit as well as the letter of the law in managing the Goldwater Range. We thus urge you in developing the final plan to move to Alternative D and reject Alternatives A and B for the reasons given above. 1.31 1.7 11.9 11.24

Thank you for the opportunity to participate in this planning process.

Cary Meister
Conservation Chair
yumaaspres@yahoo.com

Yuma Valley Rod & Gun Club, Inc.

JON FUGATE
PRESIDENT
GEORGE REINERS
VICE PRESIDENT
JERRY GAUTHIER
TREASURER
BRANDON HERNDON
CORRESPONDING SECRETARY
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BRYON STROM

POST OFFICE BOX 10450 * YUMA, ARIZONA 85366

Colonel James R. Uken, Director
United States Air Force (USAF)
56th Range Management Office
7224 North 139th Drive
Luke Air Force Base, AZ 85309-1934

April 16, 2003

Re: Resolving Public Use and Access Issues On Barry M. Goldwater Range (BMGR)

Dear Colonel Uken,

On behalf of the Yuma Valley Rod and Gun Club (YVRGC), I want to thank you for your sincere consideration of continuing existing public uses and access on the BMGR. The YVRGC appreciates the opportunity to be a stakeholder and participate in the planning process associated with development of the Integrated Natural Resource Management Plan (INRMP). Based on our review of the draft EIS for the INRMP, and information at the public hearings, the YVRGC understands the scope and complexity of the public use and access issues that must be addressed by the INRMP Team and the BEC.

The purpose of this letter is to reaffirm the YVRGC's highest priorities with respect to public use and access on BMGR.

1) Include the roads that are identified in the YVRGC's list, Public Vehicular Access On BMGR (attached). The YVRGC can support closing redundant roads in localized areas; however, these roads are not redundant and we believe that they are needed for hunter access. We do not agree with the restriction of roads to agency use only, unless it is for safety or security reasons. 1.4 1.8 1.10

2) Allow vehicle based camping within 100 feet of roads. 3.1

3) Allow vehicle travel in accessible washes. 1.1

The YVRGC respectfully request that the INRMP Team and , if necessary the BEC, incorporate these priority public use and access provisions into the preferred alternative. Otherwise, the YVRGC will continue to support Alternative B for the management of public access, recreation activities, hunting, and wildlife management. 1.1 1.4 11.10

Please contact me if you have any questions regarding this letter.

Respectfully,

Jon Fugate, President

The Yuma Valley Rod & Gun Club, Inc. Mission Includes, But Is Not Limited To:
The conservation of wildlife, habitat and natural resources. Education of the public and members to include conservation issues and firearms safety. To support and defend the second amendment of the United Sta Constitution. Provide recreation and organized activities to members and the public and participate in charitable and other community service activities especially those related to conservation and sportsmanship.

Public Vehicular Access On BMGR

Preface: The Yuma Valley Rod and Gun Club (YVRGC) is respectfully requesting modifications to include additional existing roads for public vehicular access which are not proposed in the draft preferred alternative. All Roads designated as "Government Use Only", including the proposed new Govt by-pass roads must remain open to the public, unless there is a safety or security issue. The YVRGC purpose for our request is primarily for wildlife conservation access, particularly wildlife-dependent outdoor recreation. However, in regards to the area in the northwest corner of BMGR near Fortuna Mine, we have requested additional roads be open for general public access for our winter visitors. We firmly believe that if not addressed, this particular issue carries a greater potential risk of increasing public vehicular traffic to other areas of the range where vehicular access is currently less frequent.

At minimum, the following roads must be incorporated into the preferred alternative:

1) Seven roads in NW corner of BMGR
2) Single road above Vopoki Ridge
3) Three roads south of Tinaja Altas Pass / west side of Gila Mtns.
4) Two roads south of Tinaja Altas Pass / east side of Gila Mtns.
5) One road north of Tinaja Altas Pass / east side of Gila Mtns.
6) Three roads south of Cipriano Pass / east side of Gila Mtns.
7) Single road north of Cipriano Pass / at areas 25 to 27
8) One road connecting to east side of Camino Del Diablo / between area 23 & 24
9) Pole line road and road traveling west / NW of area 23 1.4
10) Seven roads on west side of Copper Mtns.
11) Proposed Cabeza Prieta By-Pass roads
12) Two roads leading to NW boundary of Cabeza Refuge
13) Road leading from South Copper water catchment and road(s) leading into canyon
14) Road west of area 66 leading to Betty Lee Mine
15) Gov't use only road from east of Tacna to Copper Mtns.
16) Four roads NW side of Mohawk Mtns.
17) Road near Mohawk #1 catchment and Gov't use only road east from area 67
18) Road leading around tip of Mtn in Mohawks towards Mohawk #2 catchment
19) Gov't use only road leading from Mohawks west to Christmas Pass Road
20) All roads east side of Mohawks south to first Pass
21) Road off of Monreal Well road near Mohawk #3 catchment / east side of Mohawks
22) Four roads east of Hwy 85 including lead in lines / between Sauceda Mtns and Ajo / Area 6
23) Short road / SE corner of Area 6
24) Short road / south end of Sauceda Mtns
25) Short road / south end of Black Butte
26) Two spur roads / north end of Area 6

As per the YVRGC Board of Directors on 3/26/03 the following direction has been mandated:
Should this public vehicular access proposal provided by the YVRGC not be accepted as presented, the YVRGC must continue to pursue acceptance of the provisions of Alternative B to the fullest extent possible, particularly as it relates to public vehicular access on BMGR .

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

Your comments on this Draft Environmental Impact Statement (EIS) for the Barry M. Goldwater Range Integrated Natural Resources Management Plan (INRMP) are requested. Letters or other written or oral comments provided may be published in the Final EIS. As required by law, comments will be addressed in the Final EIS and made available to the public. Any personal information provided will be used only to identify your desire to make a statement (written or verbal) during the public comment portion of any public meetings or hearings or to fulfill requests for copies of EIS associated documents. Private addresses will be compiled to develop a mailing list for those requesting such information. However, only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

You can use this form to provide written comments regarding the Draft EIS. If you would like to use this form, please leave it in the comment box tonight or fold, tape, and mail this form. Any written comments must be received by May 7, 2003 to receive full consideration in the Final EIS.

The Draft EIS and a Community Report summarizing the Draft EIS is available on the Internet at www.luke.af.mil (click on public site, then Barry M. Goldwater Range Complex, Environmental Issues, Download Documents). The Draft EIS is also available at 17 libraries. For additional information, contact Capt. Stephanie Dawley (623-856-3823, ext. 231) or Mr. Ron Pearce (928-269-3401).

To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Anonymous

COMMENTS

I support all current public usage
leave all roads open as they are today.
Leave it as is

1.5

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

Ricky Adams

Written Comment Form
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To Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: BUCK APPLEBY

COMMENTS

I SUPPORT ALL PUBLIC USES OF THE BARRY M GOLDWATER RANGE AS THEY ARE OF THIS DATE 4/9/03. LEAVE ALL ROADS OPEN. 1.5

WHAT IS IMPORTANT TO ME IS THE ILLEGAL INTRY OF PEOPLE FROM THE COUNTRY OF MEXICO, ESPECIALLY IN THIS TIME OF NATIONAL + INTERNATIONAL TERRORISM. I AM A MEMBER OF THE YUMA VALLEY ROD + GUN CLUB and a AVID HUNTER AND WOULD LIKE TO CONTINUE HUNTING THE BMGR. 2.29 7.1

BUCK APPLEBY
YVR+GC BOARD MEMBER

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS PRO ENVIRONMENT SUPPORTER

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

Concerning the: **"Proposed Integrated Natural Resources Management Plan [INRMP], Barry M. Goldwater Range Community Report" February 2003.** *(Comments Due May 7, 2003)*

The proposal to seal off many public access roads on the Barry M. Goldwater Range not only stands in direct defiance of the Sikes Act, but also serves notice to the community of Ajo, Arizona that its tenuous economic stability is one step closer to ruin. 1.4 1.23 1.25

Ajo, Why and Lukeville, Arizona will be devastated economically if the Record of Decision (ROD) adopts and implements the present INRMP recommended changes to public access and non-consumptive uses of the surrounding desert!

10.1 10.3

I strongly oppose the Management Strategy recommended in the INRMP. A Record of Decision must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process, therefore, an economic impact statement must be mandated and reviewed prior to the final ROD!

For reasons enumerated in this document and the following attachments, I implore you to thoroughly investigate the mishandling and/or omission of data contained in the INRMP proposal. The illegal enforcement of certain road closures on the BMGR over the past several months (see attached) must also be investigated. It is imperative that a fair, honest and unbiased study be mandated 'before' any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why and Lukeville, AZ (to mention but a few) from public access to the desert that surrounds them. I strongly recommend that the tenets of Alternative Management Strategy "A" contained in the INRMP (no action) should remain in effect until such time as the above mentioned study can be completed and fully considered. 1.17 1.16 11.28 1.5 11.10

Sincerely, I see no constructive purpose that would be served by this rulings

Concerned Citizen

Alle W. Baldwin

Written Comment Form
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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: ROBERT BARGAROS

COMMENTS

THE Barry M. Goldwater Range and Reservation land has been [illegible] used for over many years, without any [illegible] of the Area.

I strongly urge that be left alone to allow it to be used as it has been over the years not to be locked away, not to be destroyed.

I trust that you give the people a chance to be stewards of our land.

Robert Bargaros

1.5
1.23
11.20

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

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Please seek a solution that would enhance desert use, not close us out 1.5

Sincerely,

Sharon L. Bargabos

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Sheldon R. Bedona

COMMENTS

I support the Job the military has done with the BMGR, but your latest plan in closing the roads to public use is completly "absurd." You face much larger problem with the UDA's and Drug smuglers, I'm you do the private citizens and Thier families going to Range for hunting and recreational use. Closing the Road off to the public will be no benifit to the Range what so ever. 1.5 5.5 7.1 1.5

BILL BERLAT

April 8, 2003

BMGR INRMP
Box 67132
Phoenix, AZ 85082-7132

Re: Comments on the draft EIS

Gentlemen:

I am concerned that certain considerations regarding the use of the range have not been adequately addressed or considered. The public - those of us that utilize the outdoor resources of this state - have a stake in the use of this land, and so long as that use does not interfere with the range's purpose, they should be given credence. I will address my concerns as follows:

PUBLIC ACCESS. I know that significant areas of the BMGR are presently closed to the public. What troubles me is that more are closures are proposed. 1.23 1.25

The military is charged with allowing recreational uses of these public lands. Proposed restrictions need to be challenged as there are a number of mechanisms (i.e., special use permits, weekend scheduling, range consolidation, etc.) that would allow more reasonable public access and recreational use of these lands without compromising public safety or the military's training mission. 1.15 1.25

UNWARRANTED ROAD CLOSURES. Several of the plan's alternatives seek to close a varying array of existing roads. Many of these roads are necessary to provide reasonable access to large expanses of the BMGR, its remote mountain ranges and the adjacent Cabeza Prieta National Wildlife Refuge. 1.4

Some redundant roads can, and should be, closed, but many that have been identified for closure simply are not justified. Please help us remind the DoD that this area is not a Park or a wilderness area but a bombing range. Keep the roads that we have open and only close those that are redundant. 1.10 1.11 11.27

These roads are necessary not only for the management of the wildlife resources on the BMGR but to allow reasonable use and access to public. 1.4

WILDLIFE MANAGEMENT and WILDLIFE WATERS. I understand that a push is being made to minimize, rather than expand, wildlife management and wildlife enhancement activities.

Two of the alternatives seek to place a moratorium on wildlife water developments until a definitive study proves their value and benefit. This is not only absurd it is based on poor science and ludicrous theories. Not only is there far more evidence that water is a benefit than there is to the contrary, you must consider that wildlife have become dependent on that resource and to eliminate it is folly. 2.18

It is hard for anyone to believe that in Arizona, and especially in these years of drought, provisions for water development and maintenance are not considered of utmost importance. Our wildlife resources deserve more responsible management than that which is being considered.

The experts that should be consulted and whose recommendations should be given the acceptance they deserve are the staff and biologists of the Arizona Game & Fish Department.

PARTNERS: My past experience with the USF&WS and the BLM has not been rewarding nor has it left me with any confidence in those agencies. Nor have I felt that the best interests of the wildlife resources have been of paramount concern to them. 2.5

As far as the Marine Corps and the Air Force are concerned I have great respect for their military capacity and judgement, but when it comes to wildlife resources and the uses that are at risk with this plan, they should be willing to bow to the conclusions reached by the professionals - Arizona Game & Fish Department. Others, not included as partners, but who could lend considerable expertise to these decisions are the Arizona Desert Bighorn Sheep Society and the Arizona Antelope Foundation.

Keep the politics - as much as possible - out of wildlife resource management and public use and access.

Sincerely,

Bill Berlat

Past Chairman, Arizona Game & Fish Commission
Patron Member, National Rifle Association
Life Member, Safari Club International
Arizona Hunter Ed Instructor
Retired, State Bar of Arizona

Barry M. Goldwater Range
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"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: G.W. Brack

COMMENTS

I want all EXISTING ROADS AND USES TO Remain as they are at this time. No MORE Restrictions to CAMPING, USAGE for any OUTDOOR ACTIVITIES, HUNTING or any other Public USE. 1.5 3.10 1.12

G.W. Brack

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To. Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: MICHAEL BRICK

COMMENTS

I SAPPORT ALL PUBLIC USE OF THE BMGR 11.10

AFTER HAVING ACCESS TO THE BMGR FOR THE LAST 18 YRS FOR ~~LEGAL~~ LEGAL SHOOTING SPORTS WE HAVE BEEN HARASED AND BANDED FROM USE FOR SHOOTING. WHE HAVE LAWENFORCE PERSONEL MILITARY PERSONEL AND CITIZENS WHO TAKE CARE OF OUR USE AERAS + LOW IMPACT CAMPING. ~~WE~~ WE HAVE LEFT AERAS BETTER THAN FOUND OFTEN PICKING UP AFTER OTHERS INCLUDING TRASH LEFT BY THE MCAS STATION 6.2

OUR CLUB SHOOTS MILITARY WEPONS INCLUDING ~~LEGAL~~ LEGAL FULLY AUTOMATIC WEPONS. THE PEOPLE HAVE HAD BACKGROUND CHECKS AND ALL WEPONS ARE LEGALY REGESTERED WITH FBI BATF, AND TREASUERY.

THESE GUNS HAVE NEVER BEEN USED IN A CRIME IN THE UNITED STATES IN THE YEARS OF REGERSTRATION STARTING WITH THE NFA OF 1939.

ALL WE ASK IS THE SAME CONESIDERATION WE GAVE THEM AND THE SUPORT WE GAVE MCAS WHEN THEY ASKED FOR HELP IN 1997.

a

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Lorna Brooks

COMMENTS

1) I like the idea for closing redundant roads throughout the Range, except for a short one linking 2 roads on East side of the Mohawk Mtns. That short road would make travel next to that Mountain much easier, and wouldn't require one to backtrack to the main road and circle all the way around. 1.10

2) Restricting camping to within 50 ft. of the road is not good. Even 100 ft. would be difficult to do in most areas, especially when you are travelling w/more than 3 vehicles (and you should be, given how dangerous the BMGR is what with the drug-running & other smuggling coming in from Mexico). Please consider at least 100 ft. 3.1

3) The BMGR is about military training, not hunting. Do not cater to the hunters, however loud they may be. Most of the wildlife out there is having a hard enough go of it w/out being shot from the back of a Jeep. If they want to hunt so badly, they can walk a mile or two. 2.34

COMMENTS (continued)

4) I like your ideas for shooting, especially the -no-shooting-from-sunset-to-sunrise action. Maybe a limit should be placed on how big a weapon can be - say, no cannons, no 50 mm, etc., and No shooting above a certain limit/elevation (you can't shoot at that toy airplane or above the treeline, etc.). 6.1 6.5

(Fold First)

From: L. Brooks

PHOENIX AZ 850
PM
18 APR
2003

3c USA

Barry M. Goldwater Range
Integrated Natural Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

(Fold Second)

5) We LOVE our military!! They have done a great job taking care of the BMGR. Now, if only they were allowed to guard our border... 5.5

3 May 2003

Dear Goldwater Planners,

"Heaven is under our feet as well as over our heads"--Thoreau.

I'm haunted by lines from an old song. "We never know what we've got 'til it's gone," and "They paved over Paradise and put in a parking lot." These lines summarize my fears for the Goldwater Range.

The Goldwater is one of the finest tracts of land in Arizona, in America, on the continent, and in the world. It is special, unique, and big. They don't make such land anymore. It's worth protecting, saving, preserving.

Five arguments spin through my mind, each of them good, each of them compelling, each of them yearning for a tomorrow as good as yesterday.

*The Goldwater is the "us" in the U.S. We Americans *are* wide-open spaces, frontier, and land worth defending.

*The Goldwater has special ecology. The critters and plants need a place to live. With our national and international problems of air pollution, ground water depletion, and species in danger, the Goldwater is a bright spot, a gold star.

*The Goldwater is home. If we don't take care of our desert, where're we gonna live? Why would we want to live? And with our population overflowing, we have more neighbors to share our home.

*The Goldwater is a place to re-create. Its quiet soothes us savage beasts with glowing sunsets, quiet walks, mysterious canyons, and warm sun. In our stressed-out world, where can we find such silence? The jets distract us only a few minutes a day.

*The Goldwater is our heritage, our history. It is a story told on rocks and in sherds, as well as pages in archives. It is our legacy, in the bank. If we squander it, if we waste it, then we've lost our inheritance, and then we have nothing left for our children.

10.4

The military---Marine Corps, Air Force, National Guard---has a plan to take care of its work, its missions, its business on the ground and in the air. The military has been, so far at least, a pretty good steward.

5.5

Now we are writing a plan for how civilians will use the range. In the past, the public has not always taken care of the range, but because few people visited and because the regulations seemed strict, damage has been limited. We didn't need or appreciate their off-road driving, dumping, tree cutting, vandalism of archeological and historical sites, cutting new roads, stealing cactus, disrupting military bivouacs, harassing wildlife, abandoning cars, trampling soil and plants, and littering. Use occasionally became abuse.

2.27

The military has the opportunity in this public use plan to guide, to educate, to control, to prevent, to mitigate public abuses. Public activities must be made to fit the military's mission, must help not hurt the ecology, must protect endangered species and all wildlife, must be sustainable. Otherwise, the ground suffers, the wildlife disappears, the scenery isn't worth seeing, and the military gets blamed. 5.5 11.7

The Defense Department campaigned hard to gain sole management of the Goldwater Range, so that it can control its mission. It lobbied on the slogan "We have the most to lose, so we'll do the best job." Now we'll see if it can live up to its legislated mandate, see if it can control not only its own activities, but also the destructive play of some civilians. 2.27 5.5

I'm reminded that back in 1935-1937 when concerned citizens and land managers were trying to save bighorn sheep, they proposed an immense national park of 3-5 million acres, much of it where the Goldwater is today. Special interest groups whined. The Arizona Cattle Growers Association wanted to graze its land; the Small Mine Owners Association wanted to prospect and get rich; the hunters clubs wanted to hunt it hills and washes. Well, the big park never happened. If it had, it would be more famous than the Grand Canyon. Eventually the miners found that there were only petty ores, the grazers found too little forage for any stock, and the hunters got to hunt anyway. Everyone lost something which would have benefitted us forever.

What will be the fate and future of the Goldwater? This INRMP will decide.

Desert is very costly to restore. Sometime figure what it would really cost to replace a bursage plant, that simplest and most common of shrubs: buy, dig, water weekly for a year, fuel, salary, overhead. Desert is very slow to recover. Low rainfall, low productivity. Studies how that it takes 30-100 years for bursage to recover without intervention. Bursages are the primary nurse plants for saguaros and other cacti. Life here is especially precious and interesting.

Goldwater is not repaintable like a spent target. It is not expendable like a rocket casing. It is not rebuildable like a road. It is a living thing which could easily die before our very eyes from overuse and abuse. We the public love to hike and hunt, camp and watch. If we are encouraged and educated, we can walk when we have to, we can drive where we're told, we can pick up our litter, we can resist temptation to steal cactus and shoot signs. But the landlord needs to set the tone. The landlord needs to provide staff and budget to monitor, to enforce, to fix, to think ahead of the user curve and head off problems which will affect range operations and public enjoyment for the long-term. 5.3 11.1

The Goldwater is worthy of being a Goldwater National Wildlife Refuge, a National Preserve, Wilderness, or even a Sonoran Desert National Park. It's that good. The job of keeping it that way is now up to you, the military planners, in this plan. Recently part of the Goldwater became the nucleus for a national monument. If you miss the mark, we won't need a revised plan in 25 years because there'll be nothing worth integrating, nothing to plan for, except dust and memories. 1.11

Great deserts are like great airplanes or great fighting units---they are far more than the

sum of their parts. If anyone understands this, the Marine Corps and Air Force should. And here in the Goldwater the military should see a great desert, a place of great beauty and mystery, of great character and importance in itself, by itself. It is exceptional, irreplaceable, unique. It is a critical part of an even larger ecosystem.

Yes, our public needs places to camp, and hike, and hunt. Yes, the military needs to train pilots. But we shouldn't destroy our country, our land, our wildlife in the process. Lose a little desert here and a little there... what's to worry? Another road, a caravan up a wash, an wildcat trailer park, another 5 or 10 or 100 thousand visitors. What difference will it make? 2.29 5.5

Remember the King's barber? He trimmed a little here and a little there and a little more on the side. When he was done, the King looked shorn, disfigured, and greatly displeased. His greatness was gone. An enormous price was paid. Every hair makes a difference. Every bush and cactus and jackrabbit is dearly significant to the Goldwater picture.

Eventually you should return the Goldwater to the public in better condition than you found it, and certainly in better shape than it is now. Only then will we know you have done your job well.

Truly,

Bill Broyles

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Richard A Burkhardt

COMMENTS

I have driven the road is the BMGR in the past and I support keeping all the existing roads open. I do not want any road access closed to the public 1.5

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Ed Carpenter

COMMENTS

Until all the U.D.A.'s that are causing more problems by far than sportsmen, leave the existing roads open. The modifications proposed by the Yuma Valley Rod + Gun Club is the best alternative to use. Please consider this strongly. 7.1 1.4

Thank You.

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Chris Clayton

COMMENTS

Barry M. Goldwater Range should not be closed because that will closedown some good desert that supplies habitat for many different animals. If you close it down then there is a good chance that the will be would get overpopulated. So then that could cause bad problems in the future. And I support all public use of the BMGWR. I also believe that if the roads remain open to the public like they have been for the past 10 years. I think it is BULLSHIT what you are trying to do. Another thing that needs to be looking into is the problems with the wetbacks because it seems that is a reason why you want to close it down. 1.23 1.25 2.1 2.29 1.5 11.10 1.29 7.1

Sincerely,
Chris Clayton

May 1, 2003

BMGR INRMP
P.O. Box 67132
Phoenix, AZ 85082-7132

Re: Comments - Draft EIS/INRMP

Generally, the Actions shown by Table 7 in the "Community Report" specified in the Alternative "C" appear most appropriate. There are a few items that need further consideration. 11.11

1. Closure of roads will limit the accessible area(s) available to vehicle based camping. Consequently, the proposed 50 foot limit for camping along the remaining roads will continue to be overly restrictive and will be further aggravated with the reduction of accessible roads. Permitting a 100 foot limit along the remaining roads will allow less congestion by vehicle based campers because there will be more available camp opportunities in the 50 to 100 foot area. This increase from 0-50 feet to 0-100 feet partially compensates for the reduction in road mileage. 3.1

2. Appropriate placement of proper signs will serve as a disclaimer to access the Range. Agencies requiring 4 wheel drive vehicles are overly restrictive. Caution and advisory information given when permitting entry to the Range should be adequate. 1.19

3. Human intervention disrupted the Sonoran Pronghorn Antelope habitat in draconian proportion when the Southern Pacific Railroad was constructed. Species extinction within the United States may be unavoidable. However, these animals may well survive in Northern Mexico habitat with proper management and conservation efforts. 2.40

4. Preservation, by definition, implies non-use for protection of a resource, most often cultural resources. For example, petroglyphs, ancient burial grounds, etc. Whereas, Conservation, by definition, designates resource renewal (use) by management efforts. Sustaining a healthy forest by thinning and proper harvest methods is an example. To maintain a viable wildlife (or any other organism) population by permitting inventory, monitoring and treating all elements <u>requires</u> <u>access</u>. 1.4

5. "Preservation of the biological diversity" requires that principles of the conservation ethic must be applied. Organizations with memberships professing to be "environmentalists", wilderness advocates and overly emotional individuals often do not recognize this need. The 3 volume Draft should be sufficient scientific justification to properly manage the Barry M. Goldwater Range without undue legal challenges. 11.27

Thank you for the opportunity to comment.

John F. Colvin, Jr. John F. Colvin Jr.

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas." INRPMP page 32.

By your own report the range is not endangered from visitors using it's roads. Even the little ones you have removed from your map. Why are you spending tax dollars to change something that is not in trouble? Leave the range alone to be enjoyed by those who are willing to brave unimproved road ways to see rock formations that take one's breath away, hidden valleys full of flowers and the joy spotting nature's animals in their own environment. Leave this small portion of what is left of our desert to the people of Ajo to enjoy. 1.5 10.3 10.4 11.20

Sincerely, Dorothy J. Cook

Why not think of some useful way to spend tax payers money? You don't live here and shouldn't interfere in what shouldn't concern you 10.3 11.25

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7

From: Bill Cox

COMMENTS

I Support The Access to the BARRY Goldwater Range and [redacted]'s as they currently are 1.5

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Adelle M Deschene

COMMENTS

Don't spoil our town by shuttering us out of enjoying going out for drives & picnics in our desert. Visitors from places where we come (came) from like to know what our town is all about — and it is about the desert we are living in - stay away & leave us live and also to show off our desert to all our visiting friends.

Thank You

1.5
1.23
10.3
10.4
11.25

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To: Barry M. Goldwater Range
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P.O. Box 67132
Phoenix, AZ 85082-7132

From: JAMES M. DECHEINE

COMMENTS

Do you EVER READ your own "Reports"? On page 32 in your REPORT you stated that the "OVERALL" ECOSYSTEM that is common to the BMGR, CABEZA PRIETA NWR, And ORGAN Pipe Cactus NM is not believed TO have been "deeply" OR "EXTENSIVELY" ALTERED be either PREVIOUS OR "CURRENT" ACTIVITIES INTERNAL OR EXTERNAL to these AREAS. WE PURCHASED OUR home here in AJO in 1991 And SETTLED in this AREA PRIMARILY BECAUSE of our being ABLE to go out And Enjoy this beautiful DESERT. AJO has suffered Enough ECONOMICAL hardships. People Come here to Enjoy OUR DESERT what little there has been left to us to Enjoy. LEAVE the RANGE Alone, it WAS here before I WAS born 67 YEARS Ago. LEAVE OUR Side Roads open for us to EXPLORE "OUR" DESERT. LEARN to use "OUR" TAX dollars to KEEP the land Open to "AMERICANS" for generations to Come. PLEASE SEEK A Solution that would Enhance "OUR" DESERT, Not Close "US" out

1.5
10.3
10.4
11.20
11.25

Sincerely
M. Decheine

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INRMP
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P.O. Box 67132
Phoenix, AZ 85082-7132

From: DAVE DEVYAK

COMMENTS

I WANT ALL USES ON THE BMG TO REMAIN AS PROPOSES BY THE YUMA RODDGUN CLUB. 1.4

Brian F. Dolan

April 28, 2003

Barry M. Goldwater Range
Integrated Natural Resource Management Plan Draft EIS]
P.O. Box 67132
Phoenix, Arizona 85082-7132

Re: Comments on Draft INRMP/EIS

Dear Core Team,

Please find below my comments on the aforementioned draft INRMP/EIS. Although I am inclined to initially only support alternative 1 for no action I would much rather see the following comments incorporated into the proposed alternative so that it could be shaped into a more palatable and responsible recommendation. As currently written, however, I cannot support the proposed alternative without the following modifications and additions.

* Special Use access for desert bighorn sheep hunting parties in areas 4, 5, 6 and 7 should be allowed to continue. (As it has in the past.) These areas are critical to provide sheep hunting access to the east side of the Mohawks, the north portion of the Cabeza Prieta (Mohawks, Bryon, Granite, Growler and Childs Mountains), the Sand Tanks and Paradise Well areas. 1.25

* Several roads currently slated for closure in the proposed alternative should remain open as they provide valuable and beneficial public access to many otherwise inaccessible areas. The only roads that should be closed are those that are redundant. Specific roads that should remain open will be provided in a marked up map submitted by the ADBSS. Examples of roads that should remain open are those that access the mountainous regions on the BMGR, i.e., the perimeter of the Mohawks and the Coppers, and especially the northern boundary of the Cabeza Prieta. 1.4

* Roads terminating at the Cabeza Prieta boundary that are labeled "not needed for refuge management" are actually very valuable to provide reasonable and much needed public access. In many instances these roads are the only way to gain access to the remote boundaries of this vast wilderness.

* No roads should be prescribed for "agency use" or "government use" only. In all cases all roads should also be available to the public. There is no compelling reason to restrict public access to these roads that are in public access areas. This is particularly applicable to the proposed Cabeza bypass roads in area 2, the north boundary of the Cabeza in area 2, the north exit from the Copper Mtns between areas 2 and 3, the sand dune road and north Sierra Pinta road in area 3 and the target run-in-line roads in public area 6. 1.23

* Vehicular travel should be allowed in accessible dry washes as this is the most ecologically benign means of access. I do not understand the rational for closing dry 1.1 2.59

washes when one would expect their use to be encouraged. Any minimal impact in a wash bed is regularly erased with rainfall. The same is not true for a surface road. 1.1 2.59

*Acknowledge and resolve the matter of the Paradise Well area closure. A significant investment has been made to the wildlife in this area and sportsmen should be allowed access. 1.32

* Extend campsite parameters so as to allow camping within 100' of existing roads. Allow the continuance of campfires and the use of dead and down trees for firewood. Continue the present annual access permit process but do not implement the proposed additional fee. Do not implement vehicle limits. 1.12 3.1 3.6

* Remove the restriction zone of no overnight camping on the east side of the Saucedas in public area 6. The incremental increases in public use restrictions is not warranted nor appreciated. More than 62% of the BMGR is already closed to the public and further restricting the use of the remaining 38% is not justified nor in compliance with the Sikes Act and its mandate to provide multipurpose use of its resources. 1.23 3.3

* I support the construction of new wildlife waters and the continued maintenance and redevelopment of existing waters. The proposed alternative should not have a 5-year sunset clause nor a limitation on the number of new water developments. All new water developments (14 for bighorn sheep) prescribed in the BMGR East and West HMP's should be constructed. The construction and maintenance of wildlife waters is a proven beneficial wildlife conservation activity and should be allowed to continue unless proven contrary. Do not prescribe the suspension of a wildlife water program pending future analysis. Wildlife management is not an exact science and the data currently exists to make a sound wildlife management decision that water is beneficial to wildlife. Amend the decision if future analysis proves otherwise. The Sikes Act mandates the conservation of natural resources (wildlife) for sustainable use and does not prescribe any emphasis on preservation. This means that a progressive wildlife water program should be administered and maintained. 2.7 2.8 2.18

I have followed the development of a RMP for the BMGR for many years, through many different iterations and processes, and have always, without exception, supported the Range and the Military's training mission. I did this not only to support the defense of my country but also because I knew that the Military has always been an outstanding and very cooperative steward of these public lands. I sense with this draft INRMP/EIS a move to a more restrictive and less cooperative management regime. I truly hope this is not the case and that the BMGR will remain available in the future to infrequent public use and responsible wildlife management. If these simple needs cannot be accommodated I fear that the BMGR is well on its way to becoming a de-facto National Park and losing the support of your strongest and most vocal advocates. 5.5 11.27

Sincerely,

Brian Dolan

Brian F. Dolan

Barry M. Goldwater Range INRMP
PO Box 67132
Phoenix AZ 85082-7132

May 4, 2003

RE: Management Plan for Barry M. Goldwater Range

Thank you for the opportunity to comment on the Management Plan for Barry M. Goldwater Range. Please include them as a part of the record.

I have lived in Southern Arizona since 1960, so am quite familiar with the land management issues in this region. My major concern is the protection of the fauna and flora of this magnificent region. Having been a military reservation has afforded it unique protection: I would hate to see that advantage lost.

Given my above concerns, Alternative D is the only one which comes close to providing adequate protection to this unique, nearly pristine area. There are a few items in this alternative that I would fine-tune, however. 11.9

Of all the threats to preserving the condition of the Range, roads, as usual, are the major source of degrading activities. I would urge the closing and restoring of all 765 miles of the non-essential roads that have been identified, not just the 658 miles proposed. The resulting roadless areas should be administered as wilderness areas. 1.7

For the remaining roads designated as open, camping should be restricted to within 50 feet of the road to limit environmental impact. At the very least, vehicles should not be allowed beyond this limit. Small groups of backpackers could make small, primitive camps further in. 3.2
However, in no case should dead and down wood collection be permitted, regardless of where the camp is located. 3.5

Adequate wildlife corridors are essential to maintaining the native animal populations. Thus, wash protection is another important facet. Roads should not be allowed in washes except where absolutely necessary and wash crossings should be minimized. 1.2 2.58

For both public safety and reduction of stress on wildlife, no shooting of any sort outside of legitimate hunting should be permitted. It is incomprehensible to me that automatic weapons and night shooting are even being considered. Enough hunters shoot each other in broad daylight with single-fire weapons. 2.26 6.1

Again for public safety and for protection of bats, mine should be off limits. 2.55 5.1

Construction of the Area Service Highway through the Goldwater Range will fragment and destroy a large area of habitat essential for the flat-tailed horn lizard both inside and outside the Range. If it is indeed really essential, it could easily be routed closer to existing populated areas. 2.51 12.1

The only resource extraction that should be permitted is approved game-species hunting. 2.29
Mineral extraction, sand and gravel operations, wood gathering, etc. should not be allowed. 12.3
Non-game species should be taken only for restricted scientific purposes. 2.35

All archeological, historic and cultural sites and resources must be protected from vandalism and poaching. 14.1

The legislation withdrawing the Goldwater Range provides that the plan shall "include provisions for proper management and protection of the natural and cultural resources of such lands, and for *sustainable use* by the public of such resources to the extent consistent with the military purposes for which such lands are withdrawn and reserved..." [Italics added] 5.3 11.7 13.1
Sustainability will require adequate monitoring and policing. Not all recreational uses may be consistent with sustainability.

Sustainabliity requires that a baseline study be made of the resources of the Range. This requires the provision of adequate staffing to monitor the effects of the management plan and a provision for modifying the plan if there is evidence that the goals of resource protection are not being met. Goals, timelines and staffing needs should be clearly stated in the plan. 11.1 11.18

This beautiful desert has survived until now in part because of the military presence and in part because of its remoteness. Both of these protections are now being lost. The military is relinquishing some control and population growth, especially in the Yuma area, is making it now close to an urban area. 5.5

Please include these considerations in your management plan.

Sincerely yours,

Roy M. Emrick

Roy M. Emrick

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS PRO ENVIRONMENT SUPPORTER

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

Concerning the: **"Proposed Integrated Natural Resources Management Plan [INRMP], Barry M. Goldwater Range Community Report" February 2003.** *(Comments Due May 7, 2003)*

The proposal to seal off many public access roads on the Barry M. Goldwater Range not only stands in direct defiance of the Sikes Act, but also serves notice to the community of Ajo, Arizona that its tenuous economic stability is one step closer to ruin. 1.4 1.23 1.25

Ajo, Why and Lukeville, Arizona will be devastated economically if the Record of Decision (ROD) adopts and implements the present INRMP recommended changes to public access and non-consumptive uses of the surrounding desert!

I strongly oppose the Management Strategy recommended in the INRMP. A Record of Decision must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process, therefore, an economic impact statement must be mandated and reviewed prior to the final ROD! 10.1 10.3

For reasons enumerated in this document and the following attachments, I implore you to thoroughly investigate the mishandling and/or omission of data contained in the INRMP proposal. 1.17 **The illegal enforcement of certain road closures on the BMGR over the past several months (see attached) must also be investigated.** 1.16 **It is imperative that a fair, honest and unbiased study be mandated 'before' any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why and Lukeville, AZ (to mention but a few) from public access to the desert that surrounds them.** 11.28 **I strongly recommend that the tenets of Alternative Management Strategy "A" contained in the INRMP (no action) should remain in effect until such time as the above mentioned study can be completed and fully considered.** 1.5 11.10

Sincerely,

Rev. Delna L. Eaton, H.R. Bs Ed
Mas. Div.

Concerned Citizen
Ajo, Arizona

11 year resident

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: [illegible]

COMMENTS

Doesn't we Need B M Goldwater Range For our Military Training - look what is Going on in Iraq if we dont have Military we are a Lost Nation 5.5

we also Need More open space for Hunter - Not Wast wilderness or Park Refuges Dont give us Back some of our Land 1.11 2.31 11.27

Hell wont our Taxes and our Money But you dont want us to use our Land 10.3

What about The Eagles or wets ? 7.1

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: PATRICIA FERGUSON

COMMENTS

IF THIS AREA BECOMES CLOSED IT MOVES THE US BOUNDARY BETWEEN MEXICO AND THE UNITED STATES NORTH TO THE U.S. FREEWAY #8, THUS SMUGGLING AND ILLEGAL ALIENS ~~AND HAVE~~ EASIER ACCESS TO INFILTRATING THE UNITED STATES OF AMERICA.

MAINTAIN THE CURRENT USE. BARRY M. GOLDWATER BOMBING RANGE – OUR MILITARY MUST PRACTICE SOME PLACE AND WHY MOVE CURRENT OPERATIONS. CURRENT GAME + FISH MANAGEMENT IS SUPERB. LEAVE THE ROADS OPEN. LET THE ACCESS OCCUR. OUR TAXES ARE PAYING TO MAINTAIN THIS AREA NON-WILD CHANGE.

I HAVE ATTENDED A YUMA VALLEY ROD + GUN CLUB MEETING AND THEY HAVE THE RIGHT AND CORRECT APPROACH TO THIS ~~AREA~~ AND ITS MANAGEMENT IN THE FUTURE.

LET THE BORDER PATROL HAVE MORE INFORCEMENT IN THIS AREA.

IF WORRIED ABOUT TO MANY PERSON IN THE AREA – KEEP THE ~~SMU~~ SMUGGLERS AND ILLEGAL ALIENS OUT OF THE AREA BY ENFORCEMENT.

5.5
2.1
1.5
10.3
1.4
7.1

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To Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From [illegible]

COMMENTS

I FEEL THAT RESTRICTING THE USE OF THE BMGR BY LAW ABIDING CITIZENS WHILE ALLOWING DRUG RUNNERS AND ILLEGAL ALIENS UNCONTROLLED ACCESS IS VERY UNFAIR. 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: FRED FLICK
YUMA ARCHAEOLOGICAL SOCIETY

COMMENTS

1. In alternate C, camping distance to road is 50'. This is entirely too close due to dust, etc. from road traffic. In local wilderness areas distance is 100'. If necessary to minimize impact, areas may be designated for no overnights, or parking. The statement that 50' vs 100' is a conservation of the resource is poppycock. Camping does not occur in a broad swath. As can be seen anywhere on the desert, camping only occurs in suitable areas where parking is practicable. 3.1

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Dennis Florence

COMMENTS

I support the current public use statement from the Yuma Valley Rod & Gun Club. I feel that if it can not be used for everyone and their diverse uses then the [illegible] it was [illegible] the c[illegible] it [illegible] to use them 1.4

One big issue is trying to curtail the use of this Range by UDA's until this taken care of the Cabeza will be used mainly by drug traffickers, UDA's and people who are illegally using this area. 7.1

For me to access this area I need to apply and have on my person a pass. I willingly do this. Please do not restrict my legal access to this area 5.6

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Phoenix, AZ 85082-7132

From: ED FOSTER

COMMENTS

THERE SHOULD BE NO CHANGES MADE AT B.M.G.R. 11.10

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: EDDIE FOSTER

COMMENTS

I SUPPORT all YUMA VALLY ROD AND GUN CLUBS REQUEST ON BARRY M. GOLDWATER RANGE. 1.4

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Laurel Fowler

COMMENTS

I, too, strongly oppose the Management Strategy recommended by INRMP. There are many restrictions already in place to protect this area & the desert. And they are working!! We need to be able to see our incredible desert — why live here if we can't interact with our surrounding - are we to be restricted to only our main road and our house. Drive these unimproved roads and you'll see almost no recent impact by visitors. Our area is very dependent on tourism and winter snow birds - its absolutely necessary for our future to have access to the desert - no access - no tourism. By trying to turn this area towards a 'wilderness area' is almost making a 'nothing' out of it - the public won't have any idea what's there. Just a big void. And we are asking is to continue to help protect, love and view our surrounding desert.

1.5
10.4
11.10

10.2

1.11
11.27

3-11-03

BLMGR INRMP
P.O. Box 67132
Phoenix AZ 85082-7132

Re: Management Strategies
BLMGR

Dear Sir:

From the experience of having lived in the Yuma desert for 66 years, I do say that off road vehicles have caused and are causing the most damage and degradation to this desert. 1.21

I advise absolutely no expansion of existing roads and reducing the redundant roads. 1.10

Thanks
D Frauenfelder

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: BOB ANNA FRAZIER

COMMENTS

My husband & I have been coming to Az for ten yrs as winter visitors. We would feel sick at loss if we could not go into side roads to explore the wild desert. There will be future generations after us that need to see what we have seen.
You all need to re-think a better solution - not close us all out!

1.4
10.4

Thank You

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: JERRY GAUTHIER

COMMENTS

I WOULD LIKE TO HAVE ALL CURRENT ROADS TO REMAIN OPEN TO PUBLIC USE. ACCESS FOR OUTDOOR RECREATION - (CAMPING, HUNTING ETC) AND USE FOR BORDER PATROL & GAME & FISH DEPT I BELIEVE IS IMPORTANT. 1.5 2.29

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

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Sincerely,

Lavone Taylor

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Donny Gray

COMMENTS

Why are you people so caught up in closing public land when we have illegal immigrants crossing every day. The roads that are wanted to be closed are important to hunting and our children's access.

1.23
1.25
7.1

I strongly support the proposal by the Yuma Valley Road and gun club on April 3 2003. All roads must stay open for our children and our own welfare. Why should we not be able to go on our own land. Your trying to deny access to us that "mexicans will keep on using. Mexicans are doing all damage to this desert not our Sportsmen are helping this area. Illegals are the ones that need to be denied access. Why not make illegal drug smugglers and illegals get BMGR passes.

1.4
1.5
7.1

Rome Hamner

Barry M. Goldwater Range INRMP
PO Box 67132
Phoenix, Arizona 85082-7132

April 22, 2003

Dear Sir or Ma'am,

I recently learned that the Air Force is developing an Integrated Natural Resource Management Plan to guide management of the Barry M. Goldwater Range over the next 25 years. This range contains 1.7 million acres of the most pristine desert habitat in the state. As a concerned citizen, long-time resident of southern Arizona and a passionate lover of the Sonoran Desert, I would like to make the following suggestions for the plan.

1. Inventory all washes in the area, and do not allow driving in these washes. Washes provide valuable vegetation and wildlife habitat, and habitat linkages. Vehicles in washes harm wildlife and habitat. 1.2 1.22 2.58

2. Reduce, don't increase, the number of roads. Limit driving to roads that are signed "open." Please close those roads not needed for official missions and close those which damage or threaten sensitive plant, wildlife, cultural, or scenic areas. 1.10

3. Increase the size of roadless areas, and rehabilitate (revegetate) unneeded roads and damaged areas. Wildlife benefits from large, un-roaded areas. 1.9

4. Protect archaeological and cultural sites. 14.1

5. Establish detailed monitoring plans, time lines, budgets, goals and consequences for the plan. 11.1

Considering the enormous damage from illegal uses of the Range, the lack of funding and staff, the lack of clear management goals, time lines, and consequences, the cumulative effects of legitimate uses, the variables of climate, and the military mission, Alternative D seems to be the only reasonable, prudent, and sustainable option in this plan. 1.7 11.9

Thank you for your time. I look forward to seeing the final plan.

Sincerely,

Rome Hamner

Rome Hamner

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Lanny Hardt

COMMENTS

I support the Y.V.R.&G.C. in Keeping all existing open roads on B.M.G.R. to remain open as they currently are to date 4-9-03 1.4

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: TROY HARDT

COMMENTS

I want all existing public roads + Public use to remain open as they do today 1.5 11.10

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

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Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.5

Sincerely,

Lonnie M Hauener
5/5/03

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

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Sincerely,

G Hausner 5/5/03

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: MARK HAYNES

COMMENTS

PLEASE SEE ATTACHED LETTER

Mark Haynes

April , 2003

Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, Arizona 85082-7132

Subject: Written Comments to Draft EIS, Barry M. Goldwater Range INRMP

Dear Sir or Madam:

The purpose of this letter is to express individual concern and provide input into the process that is establishing an Integrated Natural Resources Management Plan (INRMP) for the Barry M. Goldwater Range (BMGR).

By way of introduction, I have been a visitor to the BMGR for most of my fifty years. My father did the same for most of his life, including the time before it was a military training area. His father (my grandfather) also visited the area for recreation, going back as far as before statehood. I have introduced my children to the area and I would hope that they would have the opportunity to do the same for their offspring. For twenty-five years, I worked in the BMGR on almost a daily basis prior my retirement from the U.S. Border Patrol (USBP). My professional duties have included commanding the Yuma Desert Alien Rescue Team and service as Agent in Charge over the Tacna and later, Wellton Stations. As an Assistant Chief for Yuma Sector, I also served as a Border Patrol representative to the Executive Committee that coordinated governmental activities on the range. 10.4

During the years, I have seen deterioration of the natural environment on the range. Aside from natural causes such as the effects of drought, a small portion of the damage I have seen appears to be attributable to vandalism or inadvertent misuse by legitimate users. The damage most visible to the visiting public is likely a result of unauthorized off-road driving. In my opinion the damage caused by legitimate users has lessened in recent years, and is a result of public education efforts, an increased enforcement presence, and good stewardship. This effective stewardship is due to the efforts of the military, by the Bureau of Land Management, the Arizona Game and Fish Department, and others. 1.28 5.5

On the other hand, I have witnessed a large increase in permanent damage caused by illegitimate users such as alien and narcotics smugglers. These individuals have no respect for human life, for U.S. laws or regulations, or for environmental preservation. The level of these illegal activities has increased exponentially in recent years on the BMGR and on the Cabeza Prieta Wildlife Refuge, and efforts by 7.1

the USBP have been only marginally effective in reducing their effect. Unfortunately, no amount of regulation or legislation alone will eliminate this type of damage, as the creators of the damage have a blatant disregard for any notion that interferes with their lucrative activities. 7.1

Although I am not a member of the Yuma Valley Rod and Gun Club, I support their belief that Alternative Management Strategy A or B is the preferred action. Either of these actions will have the effect of ensuring the continuation of military activities that are critical for national defense. They will also preserve the natural resources of the area for future generations, but will not degrade existing recreational opportunities. 1.5 Alternative C would be acceptable, but only with the caveats suggested by the Yuma Valley Rod and Gun Club. The more restrictive actions proposed in Alternative D will eliminate or curtail legitimate activities currently allowed, and could potentially begin a process that will degrade the future usefulness of the area for military training. 1.4 However, no matter how lofty is the intent of the restrictions contained in Alternatives C and D, they will have little or no effect on the real source of environmental damage. The sources of that damage will not read the rules, obtain the proper permits, or heed the posted signs. An increased enforcement of existing laws and regulations is the only alternative for lessening or eliminating that source of damage. 8.2

Additionally, while I support a moratorium on new roads and an elimination of redundant routes, I believe range managers should limit the establishment of "administrative use only" roads. In general, absent a compelling purpose, I believe that a road open for administrative use should be open for public use also. 1.8 1.10 Keeping a road open for the exclusive use of officials, but limiting public use, is not only problematic but also contrary to common sense and the public's right to access.

Finally, I object to the closure of historically significant roads. This includes the pathways into historic mines and tanks, and through mountain passes. Examples of historically significant roads include those through High Tanks Pass. The desire to increase areas with Wilderness or quasi-wilderness status is understandable, but should not override the fact that many of these paths have a longstanding historical significance. 1.14 1.29 In my mind, closing a route of travel used for generations by vehicular traffic sacrifices historical values for wilderness or preservation values. One set of values should not automatically "trump" another set. It is shortsighted and incrementally damaging to the shared or individual cultural values of the nation. It also has the effect of restricting access to elderly or handicapped citizens, who cannot hike into remote areas.

In conclusion, it is my opinion that the INRMP should not impair the current level of military use or public access, which are not the primary sources of natural resource damage in the area. 7.1 On the other hand, to ensure resource preservation current enforcement efforts should be enhanced to deal with illegal users. I also want to thank you for the opportunity to express my views.

Sincerely,

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Pat Herdon, Jr.

COMMENTS

I want All access and Auto travel Routes to Remain open as they currently are today 4/9/03. 1.5

Much more important Issuse's of halting illegal access from U.D.A. and the control of illegal ~~contraban~~ Drug should be of top priority. 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: BRENT HERNDON

COMMENTS

I AM OPPOSED TO THE CLOSURE OF ANY ROADS THAT ARE CURRENTLY ACCESABLE FOR PUBLIC USE ON THE BMGR. IT IS RIDICULOUS THAT THESE LANDS ~~SHOULD~~ CAN BE USED FOR ILLEGAL ENTRY OF PEOPLE AND CONTRABAND INTO THE UNITED STATES WHILE TRYING TO RESTRICT USE BY LAW ABIDING CITIZENS. 1.5 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: [illegible]

COMMENTS

I support the use of public access to the BMGR. 1.4
I also support all actions proposed by the Yuma Valley Rod and Gun Club. I feel that the public use of the BMGR should continue in it's present day form. 11.10

Sincerely,
[illegible]

Written Comment Form
Draft Environmental Impact Statement for the Barry M. Goldwater Range Integrated Natural Resources Management Plan

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Bill Hook

COMMENTS

Make provision for Construction of New Water for wildlife 2.7
And Maintence of existing Water 2.8
Keep all existing Roads open for visitors, hunters, Reasearchers 1.5
And Border Control.
Make All Roads open on a Special Use permit for 1.25
hunters, Sheep herders partially. Esphishly use older
Hunters. This public land ~~or~~ Do Not Overly 3.1
Restrict Camping and Camp Fires 3.3 3.6

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: GARY W KAITTING

COMMENTS

I WANT ALL ROADS IN USE TODAY TO REMAIN IN USE. FURTHER I WANT 1.5
TO BE ABLE TO TRAVEL THE WASHES IN 1.1
MY TRUCK.

R/S
Gary W Kaitting

P.S. MAKE ALL EFFORT TO STOP U.D.A. + DRUG
~~TRAFFIC~~ TRAFFIC WHICH IS THE REAL PROBLEM 7.1
AND LEAVE THE SPORTSMEN ALONE.

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: JOHN F. KEHRING

COMMENTS

I SUPPORT ALL EXISTING ROAD PASSAGES THAT ARE IN EXISTENCE ON THIS DATE (4/09/2003) 1.5

CAMPING SHOULD BE A MINIMUM OF 100' FEET OFF THE ROAD. 3.1

WASHES THAT ARE NOW USED SHOULD CONTINUE TO BE USED. 1.1

WHEN YOU CAN CONTROL ILLEGAL ALIENS AND DRUG SMUGGLING IN THIS AREA THEN YOU CAN BEGIN TO CONSIDER SOME FORM OF PUBLIC CONTROL 7.1

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: John F. Kehrina

COMMENTS

I Support All Public uses on BMGR as They are Today, and hope They STAY as such. 1.5 11.10

UNTIL you slow OR STOP U.D.A.S This issue should be Left alone 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Alan L Kriegen

COMMENTS

I want all existing roads and trails open to public use to remain open as recomended by the yuma Valley Rod and Gun Club "UDA" 1.4

By the way. illegle entry does more harm than all the legle use by U.S citizens. Control the Border not the hand we own 7.1

Written comments for the Draft Environmental Impact Statement for the Barry M Goldwater Range Integrated Natural Resources Management Plan

For the most part I support the proposed actions chosen by the Departments of the Air Force, Navy, and Interior for the INRMP and the EIS. The proposed actions contain a good compromise between conservative and extreme that seems to best protect the natural and cultural resources of the BMGR while maintaining the primary mission of military training and providing continued opportunities for public use. 11.12

There are some issues that I felt needed to be clarified, and I'm not sure whether or not they were addressed in the INRMP or the EIS.

Internal fences leftover from historical ranches that are now absorbed in the BMGR are an additional barrier to Sonoran pronghorn. Fence removal and alteration in areas where fences are needed would greatly improve Sonoran pronghorn mobility and provide the same benefit to other wildlife species. 2.44

Collection of dead and downed wood should not be instituted, but should still prohibited, especially in HMAs and the special natural/interest areas, as dead and downed wood provides important habitat for many mammalian, avian, and invertebrate species. An alternative to broad prohibition would be to inventory and monitor dead and downed wood in HMAs and the special natural/interest areas and when in excess, allow restricted collection until volumes decrease to an acceptable baseline for wildlife habitat. 3.5

Roads that will remain open to the public as well as roads that will close will need to be plainly marked with signs to reduce confusion and encourage proper usage. Are there any plans to maintain public use roads? 1.13 1.24

If rockhounding rock removal will be limited to 25 pounds, how will that be checked and enforced? Is it 25 pounds per trip, 25 pounds per year, 25 pounds per person per time period, or 25 pounds per lifetime? A good plan for checks and enforcement should be in place. Registration forms, check stations and/or weigh-ins are a few ways that rockhounding can be kept under control. 4.3

If the BMGR is going to continue to be open to recreational shooting, I support the use of existing designated shooting areas to minimize wide range disturbance. No new areas should be created, as many communities surrounding the BMGR also have shooting ranges. A plan for maintenance and clean-up should be in place for designated shooting areas. 6.4

Pam Landin

Lainie Levick

May , 2003

Barry M. Goldwater Range
INRMP
PO Box 67132
Phoenix, AZ 85082-7132

Re: Barry M. Goldwater Range Integrated Natural Resource Management Plan

Dear BMGR,

I have been hiking, camping, back-packing and sight-seeing in the BMGR and Cabeza Prieta since 1990. This area is one of my favorite places in the Southwest. To me, the Sonoran Desert is the most beautiful, wondrous place on Earth, and the BMG contains some of the best examples of Sonoran Desert left in the Southwest. 10.4

Overall, I have been pleased with the military's management of this area, such as the prohibition of grazing, mining and recreational development. I favor plan elements that provide the greatest protection of the natural resources. Please consider my comments for the INRMP. 5.5 11.9

1. One of the biggest impacts to desert lands is from roads and vehicles. Roads cause erosion, fragment habitat, and increase wildlife fatalities. The roads system in BMGR should be reviewed and all non-essential roads should be closed and revegetated. There are many roads that don't really go anywhere and aren't needed. I support the military's proposal to close 765 miles of roads identified for potential closure, as this will help in the sustainable management of the resource. 1.7

2. There should be no driving in washes unless it is part of a designated road, and even those should be limited. All washes should be inventoried to determine if they are being used as a road, and then evaluated as to the need for the road if one is there. Washes are crucial wildlife corridors, provide essential cover and food (especially in low deserts like the BMG), and should be reserved exclusively for wildlife. 1.2 2.58

3. support protection of the cultural and archeological resources. 14.1

4. I support protection of the wildlife species such as the Flat-tailed Horned Lizard, and their habitat. For this reason, I am opposed to the proposed new Area Service Highway from San Luis which will impact this habitat. 2.51 12.1

5. I am opposed to any use of firearms for recreational purposes (other than licensed hunting) such as target practice. Hunting should be limited as much as possible to ensure that the hunted species are able to reproduce and migrate without interference. 6.1 2.34

6. The monitoring plan must contain standards for the acceptable condition of the range so that resource use can be evaluated and revised if damage is occurring. A schedule for regular monitoring should be set up. 13.1

Thank you for the opportunity to comment on this plan. Please keep me on the mailing list for all future actions concerning the BMGR.

Sincerely,

Lainie Levick

Lainie Levick

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: ANDY E LOPEZ

COMMENTS

I SUPPORT YUMA GOLF STRIKE IN THIS ISSUE 1.4

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To Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: JAY MARKS

COMMENTS

YOU ARE PROPOSING TO CLOSE WAY TOO MANY ROADS – FOR THIS REASON ALONE I MUST OBJECT TO THE PROPOSED ACTION. 1.5

IF THE CLOSURES WERE FOR ONLY REDUNDANT ROADS IT WOULD BE OKAY, BUT THE PROPOSED ALTERNATIVE CLOSES MANY ROADS THAT ARE VITAL TO REASONABLE ACCESS OF PUBLIC AREAS. 1.10

NEED TO RE-THINK AND DEFINATELY RE-MAP THE ROAD CLOSURES 1.4

(THE MAP WAS TERRIBLE AND VERY HARD TO UNDERSTAND – ALMOST APPEARED TO BE POORLY PRESENTED BY DESIGN) 1.17

I AM A VET AND SUPPORT THE MILITARY'S TRAINING MISSION BUT THIS PROPOSED PLAN GOES TOO FAR. YOU ARE CATERING TO THE ENVIRONMENTAL COMMUNITY TOO MUCH AND YOU ARE RISKING THE MILITARY. THE BMGR IS A BOMBING RANGE! LET THE ENVIRONMENTALISTS HAVE A "PARK" EXPERIENCE AT ORGAN PIPE OR THE CABEZA. THIS PRESERVATION MENTALITY IS ~~SPE~~SPREADING LIKE A FUNGUS AND IS MAKING [illegible] IT CANNOT BE SPREAD TO THE BMGR. 1.11 11.27 5.5

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Dale M. Marler

COMMENTS

+ Motorized access: Option "B" is the only realistic proposal that provides "public use" as well as applying proactive management. 1.5

+ Camping and Visitor Stay limits: Again option "B" demonstrates genuine concern and advocacy for recreationists as well as sound and reasonable management practices. Any "public safety" issues must be descriptative of a concurrance with AGFD (Az. Fish & game). 3.6 4.1 11.10

+ Rockhounding: if access & use is by permit, then option "A" is restrictive enough.

Woodcutting, Gathering, and Firewood Use, and Collection of Native Plants: Options "B" addresses all concerns & provides interim or temporary measures should occassions arise.

+ Hunting: All hunting, large & small game as well as legitimate and legal Fowl species, should be available for harvesting in accordance with Arizona Fish & Game standards: likewise varmit and predator species. 2.1 11.10 2.29 11.10

— over —

COMMENTS (continued)

Recreational Shooting: option "B" is acceptable, but no further restriction(s) would be acceptable. 11.10

* Representing People for the USA, Yuma chapter and state orginizations

(Fold First)

From:

Barry M. Goldwater Range
Integrated Natural Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

(Fold Second)

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: James E. Marquardt

COMMENTS

Gentlemen,

Please accept mycomments presented in the attached letter consisting of two (2) pages.

I can be contacted at

4/17/03

These remarks are in amplification of my testimony given at Gila Bend, AZ, on April 2, 2003.

As stated at that hearing, in my opinion the alternatives presented as "Alternative A" are the best as presented. The other alternatives are more restrictive and I believe that in order to comply with the statutory requirements of access and availability to the public that a fair amount of loosening is needed. 11.10

My specific interests in the use of the range are hunting and wildlife habitat improvement and the concomitant access and use (camping) in furtherance of those objectives.Accordingly, my comments will apply to more than one of the areas of interest shown and discussed in the Natural Resourses Management Plan itself.

I believe that the planshould be expanded to provide for more access for hunters and other users of the resource, including individuals and organizationsengaged in habitat improvement and developement for the benefit of wildlife. In this regard, road closures should be avoided except in those situations where the nearby existing roads are unnecessarily duplicative. Examples of proposed closures which should not occur are those labeled as "not needed for (the adjoining) refuge management." This type of closure flies in the face of the statutary requirement to implement rather than limit access. It would make use of the resource and assistance for wildlife virtually impossible. Specific examples of the foregoing are shown on Figure12, "Road System Alternatives." 1.15 1.25 1.10 1.4

Similarly, use of washes for access and travel should be encouraged to provide alternative means of access and avoid excessiv formation of new roads. Use of washes for access is the most ecologically gentle of all. To further minimize the creation of unnecessary roads, roads in otherwise open areas should not be restricted to agency or other government use. A road is a road and should be open to all in accordance with the congressional mandate for access. 1.1 2.59 1.8

Camping should be expanded beyond 50 feet to at least 100 feet from the roadway. This would help to dilute the impact the impact adjacent the roads. Limitations on the number of people or vehicles should be avoided. Accountability can be maintained by registration of large groups in excess of 100 or so people. 3.1 1.12

Campfires and the gathering and use of dead or down wood should be permitted. 3.6

In addition, the range management agency should affirmatively support the construction and maintenance of wildlife waters, including the necessary access to do so. That this is necessary is clearly demonstrated by the plight of the Sonoran Pronghorn on the range and in nearby areas and the heroic efforst now in progress to attempt to save the species. To those who say that wildlife survived for centuries without intervention by man, the reply must be that man has brought roads, fences and canals which prevent wildlife from reaching historic sources of water and it is incumbant upon us to make water available to those creatures. Limiting the scope and number of water developements would be arbitrary and irresponsible. Instead of a limit, the Plan should encourage and authorize the construction of as many water developements as may be needed. It is easier to abandon an unneeded developement than a species. 2.8 2.39 2.40 2.16 2.8

In conclusion, I believe that alternative "A" , with the suggested modifications and amplifications of this letter, is the best of the proposals to carry out the intent and mandate of the legislation. 11.10

Respectfully submitted,

James E. Marquardt

James E. Marquardt

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Edward Steven Martinez

COMMENTS

I have read and fully agree with the proposal that the Yuma Valley Bod & Gun Clu has proposed, in regards to this issue. 1.4

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: SANDY MARTYNEC & RICK MARTYNEC

COMMENTS

- PROHIBIT RECREATIONAL SHOOTING — 6.1
- PROHIBIT ROCK COLLECTING — 4.2
- NO WOOD CUTTING — 3.11
- PERMIT CAMPFIRES USING DEAD + DOWN — 3.6
- MONITOR WOOD SUPPLIES — 3.7
- VEHICLE CAMPING W/IN 50 FT — 3.2
- 7 DAY STAY, 28 DAY WAIT — 3.8
- PRESCRIBE RULES FOR WASTE DISPOSAL — 3.9
- PROHIBIT OFF-ROADING — 1.21
- RESTRICT WASH USE AS ROADS — 1.2
- * SPECIAL USE PERMIT ≤10 VEHICLES
- PROHIBIT USE OF METAL DETECTORS — 5.8
- RETAIN C6 LAW ENFORCEMENT OFFICERS — 8.1
- * Special use permit ≥10

*Note: These are countermanding comments, no response needed.

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: BRANDON MATTAUSCH

COMMENTS

1). KEEP SHEEP HUNTING AS THE TOOL FOR HARVESTING THE EXPANDING SHEEP POPULATION ON THE GOLD WATER RANGE. 2.1

2). EXPANDING SHEEP POPULATION HAS TO BE PRIORITY #1.

3). HUNTING + ACCESS NEED TO CONTINUE. 1.5 2.1

4). WATER IS GOOD FOR WILDLIFE. 2.9

5). LET THE AOBSS AZ. DES. BIGHORN SHEEP SOCIETY HAVE UNLIMITED ACCESS TO THE WATER HOLES TO HELP THE SHEEP. 1.25 2.6

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: DAVE MATTRUSCH

COMMENTS

1). WE NEED TO EXPAND THE DESERT BIGHORN SHEEP POPULATION ON THE BMGR.
WE NEED TO ENSURE THAT SPORT HUNTING CONTINUES - FOR SHEEP. 2.1

2). THE STATE NEEDS TO CONTROL BIG GAME POPULATIONS (AZGFD) NOT THE USFWS. 2.2 2.5

3). WATER IS KEY TO SUCCESFUL BIG GAME POPULATIONS. 2.9

4). THE DESERT BIGHORN SHEEP SOCIETY NEEDS TO MAKE NEW WATER CATCHMENTS + MAINTAIN THE CURRENT WATER SYSTEMS ON THE BMGR + IN THE WILDERNESS. 2.6

5) WHY CAN'T WE HUNT DEER HERE? 2.30

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To: Barry M. Goldwater Range
INRMP
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P.O. Box 67132
Phoenix, AZ 85082-7132

From: William Matthausch Sr

COMMENTS

As Good stewards of the land we must make sure the wild life of the area are provided for. water is prime issue more candidates + Tanks. 2.8 2.9

Thx
William Matthausch
4/26/03

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
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Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

Alice M. McKay

Written Comment Form
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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: JP MELCHIONDO

COMMENTS

I support strategy A or Strategy B 1.5
Both strategy C & D represent a cut of 38% of available roads in the 11.10
areas in question. This is NOT a minor cut or readjustment.
However does the EIS address the fact that one of the major reasons for
environmental problems within this area stems from the huge numbers of 7.1
illegal immigrants who constantly cross the area leaving all sorts of trash & etc
in the area.
Both the US Air Force & the US Marine Corps have been good-stewards
of the land - The current access system is working well- Those organizations/ 5.5
individuals who use the area on a regular basis all-in the main- use care 5.6
and respect the rules governing use- There is no reason for them to be
punished by cutting access-
The only change that is needed is for the additional access requested by 7.1
the Border Patrol so that the damage done by illegals can better be controlled-

JMelchiondo.

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
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Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely, Clinton D. Wilks

I'm sure that if Barry M. Goldwater were still alive, he would ~~not~~ agree to closing us out. He Loved Arizona and the desert & would want its people to enjoy the desert.

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: JEFF MILLER

COMMENTS

THE BMGR HAS BEEN A VERY IMPORTANT AREA FOR HUNTERS AND SPORTSMEN FOR AS LONG AS I CAN REMEMBER THESE ARE THE SAME PEOPLE WHO CLEAN, AND IMPROVE THIS AREA FOR WILDLIFE THEREFORE I SUPPORT ALL ARGUMENTS OF THE YUMA VALLEY ROD AND GUN CLUBS MOTIONS TO LEAVE ALL ROADS OPEN IN THE BMG.R. AS PRESCRIBED IN THE MEETING WITH Y.P.G. OFFICIALS 2.29 2.32 1.4

THANK YOU!

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Chris C. Mitchell

COMMENTS

Dear Gentlemen,

I have had the opportunity to attend the workshops and public meetings where I have reviewed all the alternatives for the Management Plan on the Barry M. Goldwater Range. I strongly support the plan which was presented to you by the Yuma Valley Rod & Gun Club on April 3, 2003.

I have been on numerous trips to the range including sheep hunts, camping trips, waterhole and road projects. I sincerely hope my family and I will be able to enjoy the same access to this area as we have in the past.

1.4
2.29
10.4

I thank you for this opportunity to present my concerns and hope you will give them serious consideration when deciding on the final draft.

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Billy Morgan

COMMENTS

I think closing the roads would be robbing a lot of people who enjoy them I cannot see any ecological value of closing these roads you have designated on the map. I think if you want to improve anything you should stop the ilegal trafficing of aliens or drugs coming from across the border, not the recreational use of the public. 1.5 7.1

Billy Morgan

Written Comment Form
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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: MIKE R MORGAN

COMMENTS

AS FAR AS I AM CONCERNED, THE MAJOR PROBLEM WITH INTERFERING WITH THE ENVIORNMENT OF THE RANGE IS THE ILLEGAL ALIENS CROSSING OVER AND LEAVING TRASH/DEBRIS AND CUTTING NEW ROADS/TRACKS ACROSS THE RANGE. IF WHOMEVER WAS INCHARGE WOULD DO MORE TO CURTAIL THIS PROBLEM WHICH HAS BEEN GOING ON FOR YEARS, THERE WOULD BE VERY LITTLE DAMAGE TO THE RANGE. THE SPORTSMEN WHO USE THE AREA DO NOT CAUSE THE PROBLEM. 7.1 7.2

I FEEL THAT THE EXISTING ROADS SHOULD BE LEFT OPEN FOR USE, ALONG WITH THE USE OF DRY WASHES TO TRAVEL ON BY LAW ABIDING CITIZENS. 1.1 1.5

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To: Barry M. Goldwater Range
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Phoenix, AZ 85082-7132

From: Paul E Morris

COMMENTS

I support all current public uses on BMGR as proposed by YVRCC. Do not restrict road usage by the public. I would like to see camping allowed at double the distances currently in force. I would like to see vehicle traffic allowed in washes which are large enough to permit it. 1.4 3.1 1.1

I might support Alternative C if proposed amendments of YVRCC are adopted. 1.4

I strongly believe that traffic by U.D.A.'s & drug smugglers is of a much greater concern & causes more damage & disruption of wildlife than legitimate uses by sportsman & U.S. citizens. This problem should be addressed first & foremost! 7.1

"The government which governs least governs best."

April 26, 2003

Barry M. Goldwater Range INRMP
PO Box 67132
Phoenix, AZ 85082-7132

Re: Barry M. Goldwater Range Management Plan

Gentlemen:

There are many portions of your Proposed Goldwater Range Management Plan I support, but there also are areas I have concerns with. Management Alternative D is the best fit with my recommendations for the Range. The Range suffers considerable damage from illegal uses. The lack of funding and staffing, cumulative impacts from recreational and military uses and the vagaries of climate make Alternative D the only reasonable one. My comments are as follows: 7.4 11.9

- Greater civilian use could interfere with military training on the Range while also damaging the landscape if not managed carefully. 1.31 5.3
- How you manage the Goldwater Range will considerably affect management of the Cabeza Prieta National Wildlife Refuge and the proposed Sonoran Desert National Monument. Management of the Goldwater Range should be consistent with the Refuge and Monument. 11.23
- Limit driving to roads that are signed "open". Reduce the number of existing roads to those that are not redundant. Close roads that threaten sensitive flora and fauna, and cultural sites. Close the 765 miles of road identified as potential to close. Close all washes to vehicles except where they are designated as part of a road. 1.2 1.7 1.10 1.13
- Protect all archaeological sites. 14.1
  Increase the size of roadless areas where possible. Close and rehabilitate unnecessary roads. Larger roadless areas benefit wildlife. Manage roadless areas as wilderness. 1.9 1.11
- Good monitoring plans followed by completion of monitoring scheduled is very important to maintain the desired goals for the Range. Key indicators must be representative of the ecosystem and corrective action should commence before degradation is severe. 13.7
  Camping should be restricted to within 50 feet of the roads. 3.2
- The public should not be permitted to enter mines on the Range. Old mines are very important to bat populations and are unsafe for public entry. 2.55 5.1
- Re-designate the Flat-tailed Horned Lizard Habitat Management Area and the following ACEC's: Tinajas Altas, Grand Desierto Dunes and the Mohawk Mountains and Sand Dunes. Continue to protect the Crater Range and Sentinel Plain Lava Flow Special Resource Management Areas. 9.2 9.3
- I support a ban on collecting dead and down wood in management areas 1, 4, 5 and 7 and feel you should ban collecting dead and down wood in all ACEC's and other special management areas. 3.5
- No collection of non-game species should be permitted (with the exception of legitimate scientific purposes.) 2.35

- I am adamantly opposed to allowing unrestricted recreational (non-hunting) shooting on the Goldwater Range. It would be totally inconsistent with the legislation withdrawing the lands for military use. It would conflict with other recreation uses, disturb wildlife and be a safety problem. 2.26 6.1

  I am opposed to construction of an Area Service Highway through the Range. Why build a high-speed highway through a bombing range? It would fragment the Range and destroy Flat-tailed Lizard Habitat. That highway should be located close to the cities of Yuma, Somerton, Gadsden and San Luis. 2.51 12.1

The Final Barry M. Goldwater Range Management Plan must stay consistent with the legislation that withdrew it. It must "include provisions for proper management and protection of the natural and cultural resources of such lands, and for sustainable use by the public of such resources to the extent consistent with the military purposes for which such lands are withdrawn and reserved…." Public and recreation use may be permitted where it is consistent with the military mission. 5.3 11.7

Thanks for your consideration of the above.

Sincerely,

Jim Notestine

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

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Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas." INRPMP page 32.

By your own report the range is not endangered from visitors using it's roads. Even the little ones you have removed from your map. Why are you spending tax dollars to change something that is not in trouble? Leave the range alone to be enjoyed by those who are willing to brave unimproved road ways to see rock formations that take one's breath away, hidden valleys full of flowers and the joy spotting nature's animals in their own environment. Leave this small portion of what is left of our desert to the people of Ajo to enjoy. 1.5 10.3 10.4 11.20

Sincerely,

Steven & Lupe Owenby
full time Residents
Since 1948-50

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Edward Pakkala

COMMENTS

I propose that all existing roads, accesses and conditions currently in place remain as they are. Any further restrictions are detrimental to the public now and for ~~future~~ future generations. I support the position which the Yuma Valley Rod and Gun Club took on 3 April 2003. The primary problem with the destruction of this land is the uncontrolled mass of illegal alliens crossing into the United States from Mexico. Sportsmen are not the problem. This is just another example of punishing the honest, respectable legal citizen while allowing the dishonest, illegal and drug running people to go about buisiness as usual.

1.5
11.10
1.4
7.1

Edward Pakkala
9 april 2003

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To: Barry M. Goldwater Rang
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Tyler Parsons

COMMENTS

Barry M. Goldwater Range shouldn't be shut down because the desert out the holds very good habitat for hunting. I support all public uses of all roads and dirt paches. People have been going there for 60 yrs and I would also like to enjoy it. 1.1 1.4 2.29

I think it is very unreasonable that you guys are trying to ruin a good thing. I'm sure that if you close down BMGR you will upset a majority of the public. I believe that you guys should worry more about the illegal immigrants passing through there. It ~~doesn't~~ doesn't hurt to have the public with an approved pass go out to the B.M.G.R. Most people that go out respect the land and will not do damage to B.M.G.R. 11.20 7.1 1.25

The Yuma Valley Rod and Gun Club and I strongly support public access to the B.M.G.R. 1.4

Written Comment Form
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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Fred A. Powell

COMMENTS

this note should be considered as a request for Denial of any attempt to restrict or alter the current manner of usage of the SW portion of the US Sonoran desert. the Cipo area needs people hungry for the beauty of the desert, not a restriction of access to it. 1.5 11.10 1.23 10.2

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From GEORGE A. REINERS

COMMENTS

I SUPPORT ALTERNATIVE "C" ONLY IF ALL OF THE MODIFICATIONS RECOMENDED BY THE YUMA VALLEY ROD & GUN CLUB ARE INCORPORATED. OTHERWISE I SUPPORT ALTERNATIVE 1.4

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,

Lillie J. Riner

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

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Sincerely,

Joan B. Reiner

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: DAVID Root

COMMENTS

I think the military has done an excellent job managing the BMGR, but I think you are trying to fix Something that is not broken. I have Spent alot of time on the range with family and friends both hunting Sheep as well as recreational use, and I Cannot See were closing any of the roads will have any ecological value what so ever The roads that are there we re... there for more than eighty years and it makes no sense to close them now If anything need to be fixed or Changed it should be the Stopping of illegal border crossing of allens and drug Smugglers.

5.5
11.20
2.29
1.5
1.29
7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: John E Rusin

COMMENTS

I support alternative "A" for no action - there is no reason to enhance preservation and abandon the previous two plans covering this area. This is a bombing range not a national park. 1.5 11.10 11.27

Very opposed to some of the proposed road closures. Do not restrict access to the coppers, Mohawks and Cabeza Prieta. If a road is to remain open for ~~public~~ government or agency use it should also be open for the public. 1.5 1.8

Relax camping restrictions and road closures in area 6. This area is supposed to be open for the public. 1.23 3.3

Build all the water developments identified in the previous plans. Don't fan the flames of the supposed water controversy. Water is good. Await proof to the contrary before ceasing a proactive water plan. This is a bombing range! 2.8 2.18

Barry M. Goldwater Range
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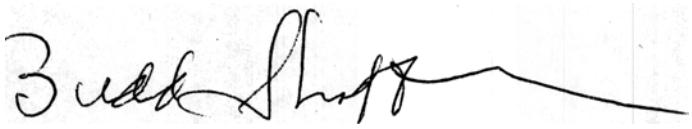
Please seek a solution that would enhance desert use, not close us out. 1.15

Sincerely,



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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Larry Smart

COMMENTS

I support all public uses prescribed by the Yuma Valley Rod & Gun Club concerning access to the B.M.G.R. My main concern is the use of this area by illegal aliens and drug smugglers. You need to address this issue before you get into these other issues. 1.4 7.1

APRIL 15, 2003

BMGR INRMP
BOX 67132
PHOENIX AZ 85082-7132

DEAR BMGR OFFICIALS

PLEASE ACCEPT THIS LETTER WITH MY COMMENTS ON THE BMGR PROPOSED INRMP DEIS.

I REVIEWED THE COMMUNITY REPORT ON THIS DEIS AND FOUND IT TO BE INFORMATIVE, FACTUAL, AND OBJECTIVE. I TO COMMEND THOSE WHO WROTE IT.

I AM PERSONALLY FAMILIAR WITH PORTIONS OF THE SONORAN DESERT, I KNOW THAT THIS DESERT HOLDS CONTRASTS FROM RUGGED ISOLATION AND DANGER TO FRAGILE RESOURCES THAT BE EASILY SCARRED OR ALTERED BY HUMAN USES. I BELIEVE THAT THE DEIS DOES A GOOD JOB OF ADDRESSING ISSUES AND CONCERNS, AND EVALUATING A PROPER RANGE OF MANAGEMENT CHOICES.

OVERALL, I SUPPORT ALTERNATIVE D BECAUSE IT WOULD REDUCE THE MOST REDUNDANT, UNNECESSARY, OR HARMFUL ROADS AND MINIMIZE ADVERSE IMPACTS. HOWEVER, THE PROPOSED ACTION IN ALTERNATIVE C IS VERY POSITIVE NECESSARY, TOO. 1.6 1.7 1.10 11.9

ROADS AND ACCESS ARE BY FAR THE MOST SIGNIFICANT INTERTWINED ISSUES, ROADS FRAGMENT THE LANDSCAPE AND CAN ALTER VEGETATION AND DRAINAGE PATTERNS, ROADS PROVIDE ACCESS INTO REMOTE AREAS WHERE HUMANS MAY THEN CAUSE ADVERSE IMPACTS, SUCH AS DEPOSITING SEEDS FROM INVASIVE EXOTIC PLANTS THESE PLANTS CAN SPREAD TO OUTCOMPETE NATIVE PLANTS, ALTER ECOLOGICAL FOODCHAINS, AND CREATE HIGHER FUEL LEVELS WHEREBY FIRE CAN BECOME AN AGENT OF HABITAT CONVERSION. 2.37

WHILE ALTERNATIVE C WOULD DO MUCH TO ADDRESS THESE CONCERNS, ALTERNATIVE D WOULD DO MORE. OF COURSE, THERE ARE OTHER ISSUES - LIKE WOOD CUTTING AND ROCK HOUNDING - WHERE ALTERNATIVES C AND D POSE STRIKING DIFFERENCES. IN THESE, ALTERNATIVE C'S DIRECTION FOR LIMITED USE MAY BE APPROPRIATE IF THESE LIMITS ARE CAREFULLY MONITORED AND ENFORCED. THE PRACTICAL ABILITY TO CONTROL HUMAN USES, AND ADAPTIVELY MANAGE TO RESPOND TO MONITORING DATA, MUST BE REALISTICALLY CONSIDERED. IF THIS ABILITY IS LOW, THE RESOURCES SHOULD GET THE BENEFIT OF ANY DOUBT IN TERMS OF THE NECESSARY LEVEL OF ACCESS AND USE RESTRICTIONS. 11.9 11.18 11.7

PLEASE ADOPT AND IMPLEMENT ALTERNATIVE D AND KEEP ME ON THIS MAILING LIST. THANK YOU VERY MUCH FOR YOUR CONSIDERATION. 11.9

SINCERELY,

Richard Spotts

Richard Spotts

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS PRO ENVIRONMENT SUPPORTER

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

Concerning the: **"Proposed Integrated Natural Resources Management Plan [INRMP], Barry M. Goldwater Range Community Report" February 2003.** *(Comments Due May 7, 2003)*

The proposal to seal off many public access roads on the Barry M. Goldwater Range not only stands in direct defiance of the Sikes Act, but also serves notice to the community of Ajo, Arizona that its tenuous economic stability is one step closer to ruin. 1.4 1.23 1.25

Ajo, Why and Lukeville, Arizona will be devastated economically if the Record of Decision (ROD) adopts and implements the present INRMP recommended changes to public access and non-consumptive uses of the surrounding desert!

I strongly oppose the Management Strategy recommended in the INRMP. A Record of Decision must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process, therefore, an economic impact statement must be mandated and reviewed prior to the final ROD! 10.1 10.3

For reasons enumerated in this document and the following attachments, I implore you to thoroughly investigate the mishandling and/or omission of data contained in the INRMP proposal. The illegal enforcement of certain road closures on the BMGR over the past several months (see attached) must also be investigated. It is imperative that a fair, honest and unbiased study be mandated 'before' any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why and Lukeville, AZ (to mention but a few) from public access to the desert that surrounds them. I strongly recommend that the tenets of Alternative Management Strategy "A" contained in the INRMP (no action) should remain in effect until such time as the above mentioned study can be completed and fully considered. 1.17 1.16 11.28 1.5 11.10

Sincerely,

Norman Stanford

Concerned Citizen
Ajo, Arizona

Norman H. Stanford

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

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Sincerely,

Norman Stanford

Norman H. Stanford

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Edward Storm.

COMMENTS

I support leaving all existing Roads + services open as they are @ this time 1.5
I see no reason or benefit to close these facilities when you can't even patrol this area for alien + Drug smugglers now. 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Tom Taylor

COMMENTS

Being a Sportsman & Avid Outdoors man, The Roads on BMG are very Important to all. I would like to Be able to use them as they are now Think. 1.5

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INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Jon Vance

COMMENTS

I want the access for the B.M.G.R. to be the same as the recommended plan by the Yuma Valley Rod & Gun Club. 1.4

The Sportsmen & women of Arizona are not the ones who are adversely affecting the terrain, it is the illegal traffic from Mexico. Fix the problem from Mexico first & leave U.S. citizens alone. 7.1

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To: Barry M. Goldwater Range
INRMP
Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

From: Henrietta Van Zwol

COMMENTS

I live in the desert because I love the desert. Taking away the right to enjoy the BML and the Barry Goldwater Range would be devastating to our love of the desert. God created the desert for us to enjoy its beauty. Please don't take that away from us. 1.5 10.4

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS PRO ENVIRONMENT SUPPORTER

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
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Why "*fix*" something that isn't broken just to waste our tax dollars. Ajo has suffered enough economical hardships. People have come here to enjoy our desert, what little there has been left to us. Why cause us anymore loss? Leave the range alone, leave our side roads open to explore. Learn to use our tax dollars to keep the land open to Americans for generations to come. 10.2 10.3 11.20

Please seek a solution that would enhance desert use, not close us out 1.15

Sincerely,
Marshal C Hunter

AJO, AZ RECLAMATION PROJECT

CONCERNED CITIZENS PRO ENVIRONMENT SUPPORTER

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P.O. Box 67132
Phoenix, AZ 85082-7132

Concerning the: **"Proposed Integrated Natural Resources Management Plan [INRMP], Barry M. Goldwater Range Community Report" February 2003.** *(Comments Due May 7, 2003)*

The proposal to seal off many public access roads on the Barry M. Goldwater Range not only stands in direct defiance of the Sikes Act, but also serves notice to the community of Ajo, Arizona that its tenuous economic stability is one step closer to ruin. 1.4 1.23 1.25

Ajo, Why and Lukeville, Arizona will be devastated economically if the Record of Decision (ROD) adopts and implements the present INRMP recommended changes to public access and non-consumptive uses of the surrounding desert!

I strongly oppose the Management Strategy recommended in the INRMP. A Record of Decision must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process, therefore, an economic impact statement must be mandated and reviewed prior to the final ROD! 10.1 10.3

For reasons enumerated in this document and the following attachments, I implore you to thoroughly investigate the mishandling and/or omission of data contained in the INRMP proposal. The illegal enforcement of certain road closures on the BMGR over the past several months (see attached) must also be investigated. It is imperative that a fair, honest and unbiased study be mandated 'before' any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why and Lukeville, AZ (to mention but a few) from public access to the desert that surrounds them. I strongly recommend that the tenets of Alternative Management Strategy "A" contained in the INRMP (no action) should remain in effect until such time as the above mentioned study can be completed and fully considered. 1.17 1.16 11.28 1.5 11.10

Sincerely,

Norma Weicher 5/6/03

Concerned Citizen

Barry M. Goldwater Range
Integrated National Resources Management Plan Draft EIS
P. O. Box 67132
Phoenix, AZ 85082-7132

"Overall, the ecosystem that is common to the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM is not believed to have been deeply or extensively altered by either previous or current activities internal or external to these areas."

This is taken from your own report, page 32. So the question has to be what is really going on here? Upon examining the proposed action C and D it reads like you are preparing to go into the park business, "restricted access" to roads that have been there since wagons traveled this area, "four full-time law enforcement positions" to do what, "prohibit rockhounding", that would give something for the law to do. Is this a park or a range? 1.29 11.27

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Please seek a solution that would enhance desert use, not close us out 1.15

Sincerely,

Norma Tacker
5/6/03

URS CORPORATION

PUBLIC HEARING

BARRY M. GOLDWATER RANGE

April 1, 2003

El Rio Neighborhood Center
1390 West Speedway

Tucson, Arizona

KATHY FINK & ASSOCIATES
2819 East 22nd Street
Tucson, Arizona 85713
(520) 624-8644 Fax (520) 624-9336

Reported by Sue Baquet, R.P.R., CCR 50413

P R O C E E D I N G S

(Opening remarks by Colonel Powers)

(Formal presentation re. Barry M. Goldwater Range EIS by Colonel Uken)

COLONEL POWERS: The first and only speaker that we have, apparently, tonight is Mr. Brian Dolan.

If I could ask Mr. Dolan to come up.

MR. BRIAN DOLAN: Hello. I'm the only speaker, okay. I'll be brief.

My name is Brian Dolan and I'm currently the vice president for the Southern Arizona Bighorn Sheep Society. I live here in Tucson, Arizona.

First and foremost, I'd like to plead that this INRMP process include consideration for opening of the Paradise Well area.

Our organization has been silenced in the recent closure of that area because we were under the impression that the state will be considering it in this INRMP. And I'm pretty disturbed that after talking to the people tonight, that that's not even on the table.

So I would really encourage that the Paradise Well area be brought into the fold of this process.

1.32

I'd also like to make a comment on something else that came to my attention tonight as I see several references on these maps: Not needed for refuge management.

And although I don't really take exception to the context in which it might have been put, I want to make it clear that a lot of those roads are required for access to the Cabeza Prieta National Wildlife Refuge by the public and by sportsmen.

So while it's not necessarily needed for management, it is required and very, very beneficial for sportsmen to access that area, and particularly the ones that are around the Cabeza Prieta Mountains. 1.4

One final comment is: Our organization would very much like to support Alternative C, the proposed alternative; but we're finding that this EIS is such a burden right now, it's very difficult for us to sort out the various issues associated with it.

I have a number of people in our organization that are feeding me input. And we really -- I think we really only have ten or eleven issues with Proposed Alternative C.

But it seems like the mechanisms that would allow a marriage of those items with some of the other alternatives will then make it so much more burdensome

for us that we might be left with no other alternative than to take a no-action alternative, which is really unfortunate for the EIS and the work that you guys have put into it. 1.4

I'd like to be assured that there would be a more collaborative way to do a marriage between these.

It is the intention for these meetings to be on a volunteer basis; and it needs to be something that volunteers can actually participate in the public process.

It's almost getting to be -- the public processes today almost discriminate against the true public and only the paid public are the ones that are represented.

Thank you.

. . .

* * *

C E R T I F I C A T E

BE IT KNOWN that I reported the foregoing proceedings verbatim pursuant to being noticed; that I was then and there a Certified Court Reporter in the State of Arizona; and that the requested portion of said proceedings were reduced to writing by me to the best of my ability.

I DO FURTHER CERTIFY that I am not a relative or attorney of any party or otherwise interested in the events of this action.

SUE KATHRYN BAQUET, CCR 50413

OFFICIAL SEAL
SUE KATHRYN BAQUET
Notary Public - State of Arizona
PIMA COUNTY
My Comm. Expires June 9, 2004

Natural Resources Management Plan

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

Gila Bend, Arizona
April 2, 2003
5:30 p.m.

PREPARED FOR:
URS Corporation
(Original)

PREPARED BY:
Sommer E. Greene, RPR
AZ Certified Court Reporter No. 50622

driver and nix
COURT REPORTERS

365 E. CORONADO ROAD, SUITE 150
PHOENIX, ARIZONA 85004
(602) 266-6525
FAX (602) 266-4303
1-800-488-DEPO (3376)
www.drivernix.com

TRANSCRIPT OF PROCEEDINGS

commenced at 5:30 p.m. on April 2, 2003, at Gila Bend High School, 308 North Martin Avenue, Gila Bend, Arizona, before Sommer E. Greene, RPR, Arizona Certified Court Reporter No. 50622.

* * *

Gila Bend, Arizona
April 2, 2003
5:30 p.m.

MR. MARQUARDT: My interest in this is something basically with the bighorn sheep. I'm representing the Arizona Bighorn Sheep Society.

Do you mind if I sit down?

In essence, what I'm here for is to be sure that we consider the welfare of bighorn sheep on the ranch. We want a life, in general, benefited as well. It's difficult to say I'm here just for sheep, just for management and things, because everything ties together.

As far as selecting one of the alternatives that you proposed, well, they are all well thought out. It's like choosing from a Chinese menu; you chose one from column A and one from column B and have them fit.

The proposal is to limit the present authorization of water hole construction -- the six water holes now, and then maybe some later. We have not been constructing a lot of water holes as we go. The only problem I have saying six now and maybe some later is that you can automatically put a limit of

2.16

six on it. I would just a soon keep that open and do it on an add-on basis. 2.16

Over the past 10 to 15 years, Lieutenant Monroe was representing the Air Force on projects on the ranch, and we had a great rapport with the Air Force, because she would let us know where we could go, where we could not go, what we could do, and what we could not do. And we had a great time. We followed the rules, and everybody played. We would like to see that system maintained rather than the strict set of rules. We will follow whatever rules the Air Force wants, as long we have access to do that. 5.6

If that fits in, then, with camping, okay. Where can we camp? What can we do with firewood, that sort of thing? We would like the rules as loose as possible. You'll find that if you follow us, even when we have 50 to 60 or 70 people on a project on a camp site, a week later you won't even know we were there. We take care of the whole situation. 3.1 3.3 3.6

As far as the camping stay limits, it's no problem. We are never there more than two to three days. I understand the reason for limits.

As far as roads are concerned, I would 1.5

rather comment on that with specific -- one of your specific maps, because it's difficult to talk about specific rules. Again, in general, I would like to see them pretty much as is. 1.5

As far as driving in washes, yes, unless you close them off. That seems to be the way to handle it. If you shut it down, we can't go through it. I guess the way you handle that is unless it's open. 1.1

That is pretty much all I have to say. Again, Arizona Bighorn Sheep Society has a good record, I think, for working with the Air Force and respecting the Air Force. I don't have any further comments.

COLONEL POWERS: Sir, in the front row, do you wish to make a comment?

MR. HOLT: My name is Steven Holt. I'm just here as a citizen this evening. I'm not representing any group. I've spent a lot of time on the range. I basically grew up on the range with my father. My fondest memories are the times you could walk around -- and I remember being on the ranch, and most of all, the meetings we've had since very first ones they were having out here on the range. And I think it's been a really thorough process. And this

is a lot of input.

I would just like to see the same things -- I'd like to see as many as the existing trails in Area A -- excuse me -- Area B left open to traveling. And from what I can tell, they really have only -- that's not a super-detailed map back here. So I'd be interested to see if it changes a little bit. Because there are trails that I can't tell whether they are closed or not. 1.5

I know as of a month ago, some of the trails -- I have been real concerned about whether they are still open or if they are marked "Open." Whether this disclosed some of those or not, I don't know. If the ones that are open are actually marked "Open" right now, I think they have done a really good job. 1.13 1.16

There is maybe in all -- I'll send in a written comment, because there is one area that's possibly -- they made a little bit too hard to access, which is just north of Ajo. But I'm not sure. I need to look at the map. But from looking at this map, I think there is a section of pink left out where you're literally going to have to spend another hour going around and back up to the G trip. That, I would like to take a look at. 1.23

I'd like to encourage the Air Force to continue to work with the Arizona Game & Fish so that they can take care of the water shoot there, especially allowing more in the Bighorn Sheep Society. I think they've done -- I haven't been on a lot of projects lately, but when I was younger I went on a lot of projects. I'd like to see them be able to maintain the one and work on the waters that are already on the ranch. 2.5

I think that if what it shows is here, it looks like everybody has done a pretty good job. And I know that speaking for a lot of local guys that use the range, it's always been our main concern was the access that they wouldn't close too much of the G trails. It looks like in Area B they haven't done that. So I'm pretty much satisfied with the things that they've done. Thank you. 1.5

COLONEL POWERS: Okay. Is there anybody else who would like to speak?

MR. EVERTSEN: I just wanted to share -- I hate using my title. Steve Holt is modest, and unlike tonight, he didn't share for you what he does for me and for the community. He is representing himself tonight as an individual. I want you to know that he is a -- I wanted you to know that he is a

council member in town. And for me only being here four months, I found it to be a valuable resource. The council sees him as a valuable resource, understanding the issues.

And obviously, by his comments tonight, you're aware of his familiarity with this area. I am not. So I looked at him for his thoughts, his input. I think they are valuable. And, also, council also looks to him for his input.

Just my own comments. I was very impressed with comprehensive nature -- the comprehensiveness of the document. There is no lack of information contained in it. This is not something that's light reading. But at the same time, I was quite surprised. I was hesitant to open it up. I didn't know if I was going to have the time to look at the whole thing. But the more I read through it, I was more impressed with it and wanted to learn more about it and read through it more.

I just wanted to say thank you to all of you that have been working on this. It's nice to see a comprehensive document where all the public input has been immigrated into it. I do not know how you could do that, but it's getting done, and it's a neat thing to see.

I probably didn't need to say all that but that's the thoughts I wanted to say. Thank you.

COLONEL POWERS: Thank you.

(The proceedings ended at 7:45 p.m.)

CERTIFICATE

I, Sommer E. Greene, hereby certify the foregoing 9 pages constitute a full, true and accurate transcript of all the proceedings had in the foregoing matter, all done to the best of my skill and ability.

DATED at Phoenix, Arizona this 3rd day of April, 2003.

Sommer E. Greene
CCR 50622, RPR

ORIGINAL

PUBLIC OPEN HOUSE REGARDING THE BARRY M. GOLDWATER RANGE ENVIRONMENTAL IMPACT STATEMENT

TAKEN AT THE YUMA CIVIC AND CONVENTION CENTER, EAST WING
1440 DESERT HILLS DRIVE
YUMA, ARIZONA

THURSDAY, APRIL 3, 2003
5:31 P.M.

REPORTED BY: KIMBERLY D. MC ANDREWS, C.S.R./C.C.R., R.P.R.
ARIZONA C.C.R. #50652, CALIFORNIA C.S.R.
#10755, NEVADA C.C.R. #527

MR. JON FUGATE: DEAR COLONEL UKEN AND MR. RON PEARCE: ON BEHALF OF THE YUMA VALLEY ROD AND GUN CLUB, I APPRECIATE THE OPPORTUNITY TO PROVIDE COMMENTS ON THE DRAFT E.I.S./I.N.R.M.P. FOR THE B.M.G.R.

THE YUMA VALLEY ROD AND GUN CLUB AGGRESSIVELY SUPPORTED THE WITHDRAWAL OF 1.7 MILLION ACRES OF THE RANGE FOR CONTINUED USE BY THE DEPARTMENT OF DEFENSE FOR TRAINING PURPOSES. IN FACT, WE AGGRESSIVELY SUPPORTED THE PREFERRED ALTERNATIVE THAT WAS DEVELOPED IN THE LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT THAT WAS SUBMITTED TO CONGRESS FOR RENEWAL OF THE WITHDRAWAL OF THE B.M.G.R.

THE GUN CLUB IS PROUD TO SAY THAT WE WILL CONTINUE TO AGGRESSIVELY SUPPORT THE MILITARY MISSION OF THE DEPARTMENT OF DEFENSE AND ITS USE OF THE B.M.G.R. FOR TRAINING PURPOSES. HOWEVER, WE WILL ALSO CONTINUE TO STRONGLY SUPPORT PUBLIC ACCESS TO THE RANGE AND WILDLIFE MANAGEMENT ACTIVITIES AND HUNTING ON THE RANGE, AS LONG AS THEY ARE CONSISTENT WITH SAFETY AND SECURITY REQUIREMENTS. 5.5

WE HAVE ALWAYS AGGRESSIVELY ADVOCATED THAT THE STATE OF ARIZONA -- I.E., GAME AND FISH DEPARTMENT -- HAS STATUTORY AUTHORITY AND RESPONSIBILITY FOR MANAGING WILDLIFE ON B.M.G.R. TO THAT END, WE HAVE ALSO AGGRESSIVELY ADVOCATED THAT THERE ARE THREE PRIMARY DOCUMENTS THAT D.O.D. MUST ABIDE BY IN THE DEVELOPMENT AND EXECUTION OF THE I.N.R.M.P. FOR THE RANGE. 2.6

THOSE DOCUMENTS ARE THE MILITARY LANDS WITHDRAWAL ACT OF 1999, THE SIKES ACT, AND A COOPERATIVE AGREEMENT THAT WAS SIGNED BY THE SECRETARIES OF THE NAVY, AIR FORCE, INTERIOR, AND GOVERNOR OF ARIZONA. THOSE DOCUMENTS LEAVE NO DOUBT AS TO THE STATE'S AUTHORITY AND CONTINUING RESPONSIBILITY FOR MANAGING WILDLIFE ON THE RANGE AND THE REQUIRED INVOLVEMENT OF THE STATE IN THE DEVELOPMENT AND IMPLEMENTATION OF THE I.N.R.M.P.

WE ARE PLEASED TO SEE THE STATE'S RESPONSIBILITIES AND REQUIRED INVOLVEMENT DOCUMENTED IN THE DRAFT E.I.S., PARTICULARLY WHERE YOU HAVE QUOTED THE SIKES ACT. 2.6

THE YUMA VALLEY ROD AND GUN CLUB CONTINUES TO STRONGLY SUPPORT THE B.E.C. AND ITS ROLE IN THE FUTURE MANAGEMENT OF THE RANGE. WE BELIEVE THAT THE CREATION OF THE B.E.C. GREATLY INCREASED THE EFFECTIVE MANAGEMENT OF THE RANGE. WE FURTHER BELIEVE THAT THE B.E.C. WAS INSTRUMENTAL IN GETTING THE COOPERATIVE AGREEMENT SIGNED BY ALL PARTIES AND HELPED FACILITATE THE COMPLETION OF A REASONABLE DRAFT E.I.S.

THE YUMA VALLEY ROD AND GUN CLUB WOULD LIKE TO SUBMIT THE FOLLOWING COMMENTS ON THE DRAFT E.I.S./I.N.R.M.P.: THE CLUB WOULD PREFER THAT ALTERNATIVE "A" OR "B" BE SELECTED FOR THE MANAGEMENT OF PUBLIC ACCESS, RECREATION ACTIVITIES, HUNTING, AND WILDLIFE MANAGEMENT. 1.5 11.10

WE BELIEVE THAT EITHER OF THESE ALTERNATIVES WOULD

CONTINUE THE TYPE OF ECOSYSTEM MANAGEMENT THAT HAS BEEN USED IN THE RELATIVELY RECENT PAST. THIS PAST MANAGEMENT HAS OBVIOUSLY RESULTED IN THE REMARKABLY GOOD EXISTING CONDITION OF THE RANGE AND RESOURCES AS DESCRIBED IN THE E.I.S. AND THE PREVIOUS L.E.I.S.; HOWEVER, THE CLUB COULD SUPPORT SELECTION OF ALTERNATIVE "C" WITH THE FOLLOWING CHANGES: INCLUDE THE ROADS THAT ARE IDENTIFIED ON THE ACCOMPANYING MAP AS OPEN TO PUBLIC USE. 1.5 11.10 1.4

WE CAN SUPPORT CLOSING REDUNDANT ROADS IN LOCALIZED AREAS; HOWEVER, WE DO NOT BELIEVE THAT THE IDENTIFIED ROADS ARE REDUNDANT, AND WE DO BELIEVE THAT THEY ARE NEEDED FOR HUNTER ACCESS. 1.10

WE ALSO DO NOT AGREE WITH THE RESTRICTION OF ROADS TO AGENCY USE ONLY, UNLESS IT IS FOR SAFETY OR SECURITY REASONS. 1.4

ANOTHER CHANGE: ALLOW VEHICLE-BASED CAMPING WITHIN 100 FEET OF ROADS.

GIVEN THE LEVEL OF CAMPING THAT OCCURS ON THE RANGE, WE DO NOT SEE HOW THIS WOULD RESULT IN SIGNIFICANT DAMAGE TO THE RESOURCES. 3.1

ANOTHER CHANGE: ALLOW VEHICULAR TRAVEL IN ACCESSIBLE DRY WASHES; AND, FINALLY: INCLUDE WORDING THAT THE DEPARTMENT OF DEFENSE WILL EVALUATE MOVING THE EAST BOUNDARY OF THE EAST TACTICAL RANGE TO THE WEST, WHICH IS SHOWN ON THE ACCOMPANYING MAP, TO ALLOW PUBLIC ACCESS TO THE 1.1 1.32

PARADISE WELL AREA.

THIS AREA HAS TRADITIONALLY BEEN OPEN TO THE PUBLIC, AND IS A POPULAR HUNTING AREA D.O.D. DISCUSSED CLOSING THIS AREA TO PUBLIC ACCESS AT ONE OF THE WORKSHOPS, AND THE CLUB BELIEVED THAT THIS DECISION TO CLOSE THE AREA WOULD BE DONE THROUGH THE E.I.S. PROCESS. 1.32

SUBSEQUENTLY, THE AREA HAS BEEN CLOSED TO PUBLIC ENTRY OUTSIDE OF THE E.I.S. PROCESS, AND WE WOULD LIKE TO BE ASSURED THAT CONSIDERATION WILL BE GIVEN TO REOPENING THE AREA TO HUNTING.

THE ROD AND GUN CLUB WOULD LIKE TO REMIND D.O.D. THAT WE ARE STRONG SUPPORTERS OF THE MILITARY MISSION AND THEIR USE OF THE RANGE AS A TRAINING FACILITY. 5.5

WE WOULD ALSO LIKE TO REMIND D.O.D. THAT CLUB MEMBERS ARE FREQUENT USERS OF THE RANGE AND ARE QUICK TO VOLUNTEER TO HELP IMPLEMENT CONSERVATION PROJECTS ON THE RANGE AND SURROUNDING LAND. WE ARE ONLY ASKING FOR REASONABLE ACCESS AND SUSTAINABLE USE OF THE RANGE RESOURCES, AS MANDATED IN THE SIKES ACT AND PUBLIC LAW 85-337. 11.7

WE WOULD ALSO APPRECIATE IT IF THE FINAL DOCUMENT WAS MORE CONCISE AND EASIER TO READ. AS IT IS WRITTEN, THE DOCUMENT IS OVER 1,000 PAGES LONG AND IS DIFFICULT TO FOLLOW. 11.5

THE FINAL DOCUMENT -- I.N.R.M.P. -- AND, POSSIBLY,

THE EXECUTIVE SUMMARY SHOULD ONLY CONTAIN THE SELECTED ALTERNATIVE, BE CLEAR AND CONCISE, AND HAVE THE APPROVAL OF THE ARIZONA GAME AND FISH COMMISSION. 11.5

WE SINCERELY THANK YOU FOR YOUR ATTENTION AND CONSIDERATION OF OUR CONCERNS AND COMMENTS.

RESPECTFULLY, JON FUGATE, PRESIDENT, YUMA VALLEY ROD AND GUN CLUB.

MS. GAIL GALLAGHER: GAIL GALLAGHER, PLANNER II, YUMA COUNTY. I'M HERE TO MAKE COMMENTS ON THE BARRY M. GOLDWATER RANGE I.N.R.M.P. AND E.I.S.

AFTER REVIEWING THE DOCUMENT ON LAND USE PATTERNS, I HAVE THE FOLLOWING COMMENTS: YUMA COUNTY WOULD CERTAINLY LIKE TO SEE THE AREA SERVICE HIGHWAY AS A PRIORITY FOR CONSIDERATION. 12.2

SOME OF THE PROJECTS THAT YUMA COUNTY HAS WORKED ON IN THE LAST TWO YEARS THAT ARE NOT ADDRESSED IN THE PLAN ARE A COUNTY 14 ROAD EXTENSION AND IMPROVEMENTS WHICH FOLLOWED COUNTY 14 ALONG THE BARRY M. GOLDWATER RANGE ON THE EAST SIDE OF THE GILA MOUNTAINS -- WEST SIDE OF THE GILA MOUNTAINS. 12.4

ALSO, THE ANNEXATIONS THAT ARE ADDRESSED, THE CITY OF YUMA AND THE TOWN OF WELLTON HAVE EXPANDED THEIR CITY BOUNDARIES, AND I WILL PROVIDE A DISK OF THAT MAP THAT SHOWS THE ANNEXATIONS THAT WE'VE ACCOMPLISHED IN THE LAST TWO YEARS.

ONE OF THE PROJECTS THAT MAY AFFECT FLIGHT PATTERNS IN THE LOW OVERFLIGHT AREA ON THE EAST SIDE OF THE GILA MOUNTAINS IS THE WELLTON MOHAWK POWER PLANT. CURRENTLY, THERE IS AN APPLICATION FOR A SPECIAL USE PERMIT FOR THE POWER PLANT, AND THERE WILL BE 600-FOOT HIGH SMOKESTACKS, IN WHICH WE ARE CURRENTLY GOING THROUGH THE APPROVAL PROCESS FOR THE VARIANCES.

I HAVE ALSO BROUGHT A LIST, WHICH I WILL PROVIDE, OF THE SUBDIVISION APPROVALS THAT ARE ADJACENT TO OR WITHIN A HALF MILE OF THE BARRY M. GOLDWATER RANGE ON THE WEST SIDE OF THE GILA MOUNTAINS.

SOME OF THE NEW ORDINANCES THAT YUMA COUNTY HAS PASSED IN THE LAST TWO YEARS IS THE AIRPORT DISTRICT ORDINANCE, A NEW ORDINANCE FOR THE AUXILIARY II FIELD. 12.4

THE COUNTY HAS ADOPTED THE 2010 COMPREHENSIVE LAND USE PLAN.

WE HAVE ALSO ADOPTED NEW MAJOR AMENDMENT CRITERIA THAT PROVIDES CRITERIA FOR DETERMINING WHETHER OR NOT A -- A LAND USE CHANGE CAN BE MADE IN THE COMPREHENSIVE PLAN.

IN -- ALSO, IN THE "LAND USE" SECTION, UNDER THE DESCRIPTION OF THE AREA NEAR DATELAND, WE HAVE -- IN THE NEW LAND USE, THERE ARE SHRIMP FARMS IN THE HYDER AND AZTEC AREA. WE HAVE A FARM OF OVER 5,000 HEAD OF CATTLE FOR A DAIRY THAT IS ESTABLISHED.

LET'S SEE...ALSO, THE WELLTON MOHAWK IRRIGATION

DRAINAGE DISTRICT IS IN THE PROCESS OF -- OF TRANSFERRING LANDS FROM BUREAU OF RECLAMATION TO WELLTON MOHAWK IRRIGATION DRAINAGE DISTRICT; AND THERE'S ABOUT 1500 ACRES THAT ARE ON THE BARRY M. GOLDWATER RANGE, OWNED BY W.M.I.D.D., BUT THERE'S ALSO ABOUT TWO AND A HALF MILES OF LANDS THAT WILL BE OWNED BY W.M.I.D.D. THAT ARE PARALLEL TO THE BARRY M. GOLDWATER BOUNDARY. 12.4

OKAY. LET'S SEE...UNDER..."WILDLIFE," WHERE THERE'S A DISCUSSION ON THE BAT GATES FOR THE MINES TO CLOSE THE MINE AREAS, THEY NEED TO BE DESIGNED TO ALLOW BARN OWLS, FOX, AND RING-TAILED CATS. ALSO, SOMETIMES, THE BIGHORN SHEEP ENTER THE MINES TO SHADE UP. 2.54

ON PAGE 4-304 IN THE B.M.G./I.N.R.M.P., IN THE SECOND PARAGRAPH, UNDER THE GILA MOUNTAINS TO THE MOHAWK MOUNTAINS, THE THIRD SENTENCE, THERE'S A CORRECTION. THE SENTENCE SHOULD READ: "THE CITIZENS' GROUP IS CURRENTLY ATTEMPTING TO RECEIVE A PERMANENT WATER SUPPLY FROM THE TOWN OF WELLTON."

ON PAGE 4-304, UNDER THE SECTION -- 4-305, UNDER "MOHAWK MOUNTAINS TO SENTINEL PLAIN, EXISTING LAND USE," PLEASE ADD THAT "THERE ARE TWO SHRIMP FARMS AND ONE DAIRY FARM."

ALSO, ON PAGE 4-306, "SENTINEL PLAIN TO GILA BEND," ADD, "THERE IS ONE SHRIMP FARM."

ON PAGE 4-313, IN THE TABLE 4-35, "LAND USE 12.4

MANAGEMENT PLANNING DOCUMENTS FOR AREAS WITHIN THE PERIMETER STUDY AREA," PLEASE ADD, "YUMA COUNTY COMPREHENSIVE PLAN 2001."

OKAY. ON PAGE 4-315, UNDER "YUMA COUNTY LOCAL LAND USE PLANS," ADD, "YUMA COUNTY 2010 COMPREHENSIVE PLAN AND CITY OF YUMA GENERAL PLAN." 12.4

OKAY. ON PAGE 4-369, UNDER THE "FORT YUMA QUECHAN INDIAN TRIBE," YOU NEED TO ADD THAT "THE TRIBE MANAGES FIVE TRAILER AND R.V. PARKS, A SMALL GROCERY STORE, MUSEUM, CASINO AND BINGO HALL."

THAT'S ALL I HAVE.

MR. MEISTER: MY NAME IS CARY MEISTER. I'M CONSERVATION CHAIR FOR THE YUMA AUDUBON SOCIETY.

OUR COMMENTS TONIGHT ARE BASED ON THE EXECUTIVE SUMMARY. WE'LL SUBMIT WRITTEN COMMENTS BASED ON A READING OF THE WHOLE PLAN AND MAY ADD OR MODIFY COMMENTS FROM TONIGHT.

THERE'S A LOT TO SUPPORT IN THIS PROPOSED PLAN. FOR EXAMPLE, WE SUPPORT THE PROPOSAL TO CLOSE 658 MILES OF ROADS AND ENCOURAGE CLOSURE OF ALL 765 MILES OF ROAD THAT WERE IDENTIFIED FOR POTENTIAL CLOSING. 1.6 1.7

WE ALSO SUPPORT THE PROPOSED PLAN ELEMENT THAT CLOSES ALL WASHES TO VEHICLES UNLESS THEY ARE PART OF A DESIGNATED ROAD AND SUPPORT THE PROVISION OF THE PLAN THAT CLOSES ALL ROUTES UNLESS THEY ARE DESIGNATED AS OPEN BY THE 1.2

PLAN.

WE SUPPORT THE PLAN PROPOSAL TO MANAGE ROADLESS AREAS OF 3,000 ACRES OR MORE AS ROADLESS AND FOR CONSERVATION. 1.9

WE ALSO SUPPORT REDESIGNATION OF THE FLAT-TAILED HORNED LIZARD HABITAT MANAGEMENT AREA AND THE A.C.E.C.'S. 9.2

WE WOULD ALSO LIKE TO SEE RECOGNITION GIVEN TO THE SENTINEL PLAIN LAVA FLOW SPECIAL RESOURCE MANAGEMENT AREA AND THE CRATER RANGE S.R.M.A., WHICH THE PROPOSED PLAN WON'T DO. 9.3

WE SUPPORT THE MONITORING PLAN WITH THE PROVISION THE KEY INDICATORS BE TRULY REPRESENTATIVE OF THE ECOSYSTEM AND THAT YOU TAKE IMPLEMENTING CORRECTIVE ACTION BEFORE MEASURES OF RESOURCE DEGRADATION HIT CRITICAL VALUES. 13.7

WE SUPPORT THE CAMPING LIMIT OF NO MORE THAN 50 FEET FROM THE CENTER OF THE ROAD. THIS WILL HELP THE ENVIRONMENT FROM GETTING TORN UP BY VEHICLES SEEKING CAMP SITES; AND WE SUPPORT THE PROPOSAL TO PREVENT THE PUBLIC FROM ENTERING MINES TO PROTECT BATS AND PROMOTE PUBLIC SAFETY. 3.2 2.55 5.1

THERE ARE ALSO ASPECTS OF THE PROPOSED PLAN THAT WE DON'T SUPPORT: IN PARTICULAR, CONSTRUCTION OF THE AREA SERVICE HIGHWAY THROUGH THE GOLDWATER RANGE. THIS ROAD, WHICH WILL TRAVEL EAST FROM SAN LUIS UNTIL IT REACHES THE RANGE AND THEN TURN NORTH, WILL, AMONG OTHER THINGS, DESTROY FLAT-TAILED HORNED LIZARD HABITAT. 12.1

IT IS ALSO A CLEAR CASE OF ENCROACHMENT ON A MILITARY RESERVATION; AND SUPPORTING A HIGH-SPEED HIGHWAY DOES NOTHING TO FURTHER THE MILITARY PURPOSES FOR WHICH THE GOLDWATER RANGE WAS ESTABLISHED. IN FACT, IT IS CONTRARY TO THOSE PURPOSES.

IF THE ROAD IS BUILT, THERE WILL BE PRESSURE TO OPEN UP THE GOLDWATER RANGE TO MORE DEVELOPMENT AND, EVENTUALLY, PRESSURE TO SEVER THE AREA FROM THE RANGE. 12.1

DOES IT MAKE SENSE TO BUILD A ROAD ACROSS A BOMBING RANGE?

THE ROUTE OF THE AREA SERVICE HIGHWAY SHOULD BE CLOSER TO THE CITIES OF YUMA, SOMERTON, GADSDEN, AND SAN LUIS.

WE ADVOCATE THE ELIMINATION OF NONGAME SPECIES COLLECTION, WHICH ISN'T IN THE PROPOSED PLAN, TO REDUCE HARASSMENT OF MANY ANIMAL SPECIES AND HELP KEEP THE GENE POOL HEALTHY, AS COLLECTORS TEND TO GO FOR -- GO FOR TROPHY SPECIMENS. 2.35

THE LEGISLATION WITHDRAWING THE GOLDWATER RANGE PROVIDES THAT THE PLAN SHALL, QUOTE, "INCLUDE PROVISIONS FOR PROPER MANAGEMENT AND PROTECTION OF THE NATURAL AND CULTURAL RESOURCES OF SUCH LANDS, AND FOR SUSTAINABLE USE BY THE PUBLIC OF SUCH RESOURCES, TO THE EXTENT CONSISTENT WITH THE MILITARY PURPOSES FOR WHICH SUCH LANDS ARE WITHDRAWN AND RESERVED. 11.7

1 "THUS, WHILE MANAGING FOR PROTECTION OF NATURAL AND
2 CULTURAL RESOURCES IS MANDATORY, PUBLIC USE MAY OCCUR ONLY
3 IF IT IS SUSTAINABLE IN RELATION TO THE ENVIRONMENT, AND
4 ONLY IF IT IS CONSISTENT WITH THE MILITARY MISSION. 11.7
5 "THIS IS IMPORTANT TO REALIZE AS PEOPLE MAKE THEIR
6 REQUESTS FOR VARIOUS TYPES OF RECREATION ON THE GOLDWATER
7 REFUGE."
8 THANK YOU.
9 MR. PAUL JOHNSON: MY NAME IS PAUL JOHNSON. I'M
10 APPEARING HERE AS A PRIVATE CITIZEN; HOWEVER, IT PROBABLY
11 WOULD BE BETTER FOR THE RECORD TO NOTE THAT I'M AN ELECTED
12 OFFICIAL. I'M A MEMBER OF THE YUMA CITY COUNCIL; AND, ALSO,
13 FOR THE RECORD, I'D LIKE TO MAKE IT CLEAR THAT I AM NOT NOW
14 AND NEVER HAVE BEEN AN EMPLOYEE OF ANY -- CIVILIAN EMPLOYEE
15 OF ANY PART OF THE DEPARTMENT OF DEFENSE OR ANY OF ITS
16 SUBORDINATE PARTS.
17 THE LAST ASSOCIATION I HAD WITH THE MILITARY WAS IN
18 1966, WHEN I WAS DISCHARGED AS AN AIRMAN FROM THE AIR FORCE,
19 SO IT'S BEEN A LONG TIME SINCE I'VE HAD ANY CONTACT WITH THE
20 MILITARY, AND I'M IN NO WAY ASSOCIATED WITH THEM.
21 I HAVE, HOWEVER, LIVED IN YUMA FOR 27 YEARS; AND FOR
22 25 OF THOSE YEARS, I HAD PERIODIC OPPORTUNITIES, AS PART OF
23 MY JOB, TO GO ONTO THE RANGE, BOTH ON THE GROUND AND AT
24 LOW-LEVEL FLIGHTS OVER IT. MANY, MANY OCCASIONS, PRIMARILY
25 WEST OF THE MOHAWK MOUNTAINS, BUT ALSO EXTENDING ALL THE WAY

OVER TO HIGHWAY 85; AND IT'S BEEN MY PERSONAL OBSERVATION THAT THE MILITARY'S OPERATIONS OUT THERE HAVE VIRT-- OR THE IMPACT IS VIRTUALLY NONEXISTENT. THERE IS AN EXTREMELY MILD IMPACT OF THE PRESENCE OF THE MILITARY IN THAT AREA. 5.5

WHAT I HAVE OBSERVED THAT DOES IMPACT THE AREA IS THE LARGE NUMBER OF SMUGGLING OPERATIONS THAT ROUTINELY DRIVE VEHICLES ACROSS THAT AREA TO SMUGGLE DRUGS AND ALIENS INTO THE UNITED STATES.

THERE'S PROBABLY TEN TIMES TO A HUNDRED TIMES AS MUCH IMPACT ON THE ENVIRONMENT BY THE ILLEGAL ENTRY OF PEOPLE INTO THE UNITED STATES, BOTH ON FOOT AND BY VEHICLE, AS THE MILITARY HAS ON THAT AREA.

IT DOESN'T TAKE BUT THREE OR FOUR TRIPS WITH A FOUR-WHEEL DRIVE VEHICLE ACROSS THE DESERT TO CREATE A NEW ROAD. THAT NOT ONLY CREATES A NEW ROAD, IT ALSO CHANGES THE WATER COURSES AND AFFECTS THE FOLIAGE AS IT GROWS OUT THERE. 7.1

IF YOU GO OUT THERE ON THE GROUND IN THE AREA OR YOU FLY OVER IT, YOU WILL FIND SUBSTANTIAL AMOUNTS OF DEBRIS OUT THERE -- HUMAN DEBRIS. IT'S NOT PUT THERE BY THE MILITARY; IT'S DROPPED BY SMUGGLERS AND THE PEOPLE AND THE MATERIAL THAT THEY'RE SMUGGLING ACROSS THE RANGE.

THE PROBLEM ON THAT RANGE, SO FAR AS HUMAN IMPACT, ISN'T COMING FROM THE MILITARY; IT'S COMING FROM THE ILLEGAL USE OF THAT BY SMUGGLERS AND OTHER PEOPLE TRYING TO GAIN

ACCESS TO THE UNITED STATES. 7.1

THE BEST THING -- THE BEST WAY I COULD SUM UP MY COMMENTS IS THAT I THINK THE MILITARY HAS DONE A TERRIFIC JOB OF TAKING CARE OF THE ENVIRONMENT IN THAT AREA, AND I THINK IT WAS A REAL TRAGEDY THAT THE MILITARY AND THE OTHER AGENCIES ASSOCIATED WITH THE MANAGEMENT OF THE RANGE WERE NOT ALLOWED TO PROVIDE SUPPLEMENTARY WATER AND FEEDING FOR THE PRONGHORN ANTELOPE DURING OUR RECENT DROUGHT. 2.43

THE FACT OF THE MATTER IS A HUNDRED AND TWENTY-FIVE YEARS AGO, THERE WAS A RAILROAD BUILT ACROSS THE NORTH END OF THAT RANGE THAT RESTRICTED THE MOVEMENT OF THE ANTELOPE. MORE THAN 50 YEARS AGO, THERE WAS A HIGHWAY BUILT ACROSS THE SOUTHERN PART OF THAT RANGE IN MEXICO, MEXICAN FEDERAL HIGHWAY NUMBER 2.

IN EFFECT, IT CREATED A BIOLOGICAL ISLAND THAT GREATLY RESTRICTED THE ABILITY OF THE PRONGHORN ANTELOPE TO SEEK FOOD AND WATER WHERE THEY WOULD NATURALLY DO. IT HAS CREATED AN ARTIFICIAL ISLAND -- BIOLOGICAL ISLAND OUT THERE THAT HAS NOTHING WHATSOEVER TO DO WITH WHAT THE MILITARY DOES OUT THERE; AND WITHOUT THE VARIOUS AGENCIES' AND THE MILITARY'S COOPERATION TO PROVIDE SUPPLEMENTARY FEEDING AND WATERING DURING THESE NATURAL CYCLES OF DROUGHT, THOSE ANIMALS WILL GO EXTINCT; AND WHAT THE MILITARY HAS DONE AND THE OTHER AGENCIES HAVE DONE TO TRY AND SUSTAIN THESE VARIOUS SPECIES IS TO BE COMPLIMENTED. 2.39 2.40

THANK YOU.

MR. JON FUGATE: THANK YOU, COLONEL POWERS.

COLONEL POWERS, MEMBERS OF THE CORPS PLANNING TEAM, MY NAME IS JON FUGATE. I'M PRESIDENT OF THE YUMA VALLEY ROD AND GUN CLUB.

OUR CLUB HAS BEEN INVOLVED IN THE WITHDRAWALS OF THE BARRY M. GOLDWATER RANGE NOT ONLY WITH THIS ONE, BUT THE PREVIOUS ONE, AND PRIOR TO 1986.

OUR ISSUES THEN ARE OUR ISSUES NOW: WILDLIFE CONSERVATION AND PUBLIC VEHICULAR ACCESS.

WE WERE STAUNCH SUPPORTERS OF THE L.E.I.S. AND THE PREFERRED ALTERNATIVE WHICH RENEWED THE B.M.G.R. FOR THE NEXT 25 YEARS AND, OBVIOUSLY, IT WAS ACCEPTED BY CONGRESS.

WHAT CONGRESS APPROVED HAS LED US TO THE POINT OF WHERE WE ARE TODAY, AND THAT'S DEVELOPING AN I.N.R.M.P. FOR THE NEXT 25 YEARS.

THE CORPS TEAM SHOULD BE PROUD OF WHAT HAS TRANSPIRED OVER THE PAST THREE YEARS, PARTICULARLY, WITH THE DIFFICULT TASK OF DEVELOPING THE SERIES OF ALTERNATIVES OF WHICH ARE PRESENT AND IN THIS 1,000-PAGE-PLUS DRAFT E.I.S.

THE CLUB HAS REVIEWED THE DOCUMENT AND FOUND IT TO BE MOST ADEQUATE IN REGARDS TO N.E.P.A.; HOWEVER, AFTER REVIEW OF THE PREFERRED ALTERNATIVE, PARTICULARLY, AS IT RELATES TO WILDLIFE CONSERVATION AND, EVEN MORE PARTICULARLY, AS IT RELATES TO PUBLIC VEHICULAR ACCESS, WE'D 1.4

FIRMLY BELIEVE MODIFICATION IS MOST NECESSARY IN ORDER TO APPROPRIATELY ALLOW PUBLIC USE ON THE RANGE.

THE CLUB HAS PERSISTENTLY ADVOCATED THAT EXISTING AND CURRENT PUBLIC USES SHOULD BE INCORPORATED INTO THE PREFERRED ALTERNATIVE. UNFORTUNATELY, WE HAVE DETERMINED THAT IT IS NOT THE CASE AS PER THE PROPOSED ALTERNATIVE AS WE READ IT.

I'M REPRESENTING THE CLUB THIS EVENING IN AN ATTEMPT TO CHANGE THE CORPS PLANNING TEAM'S MINDS, IF YOU WILL, AND THAT'S OUR BOTTOM LINE. 1.4

THE BOARD OF DIRECTORS OF THE CLUB HAVE PROVIDED ME, AS PRESIDENT, WITH CLEAR MANDATE TO PURSUE OUR ACCEPTANCE OF THE PREFERRED ALTERNATIVE ONLY WITH INCLUSION OF OUR PROPOSED MODIFICATIONS, WHICH I HAVE PROVIDED WRITTEN COMMENT IN DETAIL; AND I WOULD LIKE TO ACKNOWLEDGE PUBLICLY WHAT OUR -- BASICALLY, WHAT OUR COMMENTS ARE.

WE WOULD LIKE TO SUBMIT THE FOLLOWING COMMENTS ON THE DRAFT E.I.S./I.N.R.M.P.: THE CLUB WOULD PREFER THAT ALTERNATIVE "A" OR "B" BE SELECTED FOR THE MANAGEMENT OF PUBLIC ACCESS, RECREATION ACTIVITIES, HUNTING, AND WILDLIFE MANAGEMENT. 1.5 11.10

WE BELIEVE THAT EITHER OF THESE ALTERNATIVES WOULD CONTINUE THE TYPE OF ECOSYSTEM MANAGEMENT THAT HAS BEEN USED IN THE RELATIVELY RECENT PAST. THIS PAST MANAGEMENT OBVIOUSLY RESULTED IN THE REMARKABLY GOOD EXISTING CONDITION

OF THE RANGE AND RESOURCES AS DESCRIBED IN THE E.I.S. AND THE PREVIOUS L.E.I.S.; HOWEVER, THE CLUB COULD SUPPORT THE SELECTION OF ALTERNATIVE "C" WITH THE FOLLOWING CHANGES: INCLUDE THE ROADS THAT ARE IDENTIFIED ON THE ACCOMPANYING MAP AS PROVIDED BY US TONIGHT. 1.5 11.10 1.4

WE CAN SUPPORT CLOSING REDUNDANT ROADS IN LOCALIZED AREAS; HOWEVER, WE DO NOT BELIEVE THAT THE IDENTIFIED ROADS THAT WE'VE IDENTIFIED ARE REDUNDANT, AND WE DO BELIEVE THAT THEY ARE NEEDED FOR HUNTER ACCESS. 1.10

WE ALSO DO NOT AGREE WITH THE RESTRICTIONS OF ROADS TO AGENCY USE ONLY, UNLESS IT IS FOR SAFETY OR SECURITY REASONS. 1.4

WE ALSO SUPPORT ALLOWING VEHICLE-BASED CAMPING WITHIN 100 FEET OF THE ROADS, INSTEAD OF 50. GIVEN THE LEVEL OF CAMPING THAT OCCURS ON THE RANGE, AS NOTED IN THE E.I.S., WE DO NOT SEE HOW THIS WOULD RESULT IN SIGNIFICANT DAMAGE TO THE RESOURCES. 3.1

WE ALSO SUPPORT ALLOWANCE OF VEHICULAR TRAVEL IN ACCESSIBLE DRY WASHES; AND, FOURTH, WE WOULD LIKE TO SEE WORDING INCLUDED THAT THE DEPARTMENT OF DEFENSE WILL EVALUATE MOVING THE EAST BOUNDARY OF THE EAST TACTICAL RANGE TO THE WEST, ALSO SHOWN ON OUR ACCOMPANYING MAP, TO ALLOW PUBLIC ACCESS TO PARADISE WELL AREA. THIS AREA HAS TRADITIONALLY BEEN OPEN TO THE PUBLIC AND IS A POPULAR HUNTING AREA. 1.1 1.32

D.O.D. DISCUSSED CLOSING THIS AREA TO PUBLIC ACCESS AT ONE OF THE PUBLIC WORKSHOPS, AND THE CLUB BELIEVED THIS DECISION TO CLOSE THE AREA WOULD BE DONE THROUGH THE E.I.S. PROCESS. SUBSEQUENTLY, THE AREA HAS BEEN CLOSED TO PUBLIC ENTRY OUTSIDE OF THE PROCESS, AND WE WOULD LIKE TO BE ASSURED THAT CONSIDERATION WILL BE GIVEN TO REOPENING THE AREA TO HUNTING. 1.32

THE CLUB WOULD ALSO LIKE TO REMIND D.O.D. THAT WE ARE STRONG SUPPORTERS OF THE MILITARY MISSION AND THEIR USE OF THE RANGE AS A TRAINING FACILITY. 5.5

WE WOULD ALSO LIKE TO REMIND D.O.D. THAT CLUB MEMBERS ARE FREQUENT USERS OF THE RANGE AND ARE QUICK TO VOLUNTEER TO HELP IMPLEMENT CONSERVATION PROJECTS ON THE RANGE AND SURROUNDING LAND.

WE ARE ONLY ASKING FOR REASONABLE ACCESS AND SUSTAINABLE USE OF RANGE RESOURCES AS MANDATED BY THE SIKES ACT AND PUBLIC LAW 85-337. 11.7

WE WOULD ALSO APPRECIATE IT IF, IN THE FINAL DOCUMENT -- IF THE FINAL DOCUMENT WAS MORE CONCISE AND EASIER TO READ. AS IT IS WRITTEN, THE DOCUMENT IS OVER 1,000 PAGES LONG AND IS DIFFICULT TO FOLLOW. 11.5

THE FINAL DOCUMENT -- MEANING THE I.N.R.M.P. AND, POSSIBLY, THE EXECUTIVE SUMMARY -- SHOULD ONLY CONTAIN THE SELECTED ALTERNATIVE, BE CLEAR AND CONCISE, AND HAVE THE APPROVAL OF THE ARIZONA GAME AND FISH COMMISSION.

ON BEHALF OF THE YUMA VALLEY ROD AND GUN CLUB, WE SINCERELY THANK YOU FOR YOUR ATTENTION AND CONSIDERATION OF OUR CONCERNS AND COMMENTS.

MR. JOE MELTON: I DON'T REALLY HAVE A PREPARED STATEMENT, BUT MY NAME'S JOE MELTON, ARIZONA GAME AND FISH COMMISSION.

THE BOTTOM LINE IS, I GUESS, WHEN YOU GET RIGHT DOWN TO IT, I HAVE TO MAKE THE DECISION WHETHER THIS IS ACCEPTED, AS WELL AS MY OTHER CONSTITUENTS.

WE HAVE FOUR MORE COMMISSIONERS. WE SERVE FIVE-YEAR TERM. ONE'S SELECTED EVERY YEAR.

WE SET ALL POLICY FOR THE ARIZONA GAME AND FISH DEPARTMENT, SO THIS HAS TO COME TO OUR TABLE TO SAY YEA OR NAY ON; AND I'M HERE, ALSO, TO REPRESENT MY CONSTITUENTS FROM THIS AREA, AS I REPRESENT THE WESTERN PART OF THE STATE, SO THIS IS NOT GOING TO BE AN EASY DECISION TO MAKE WHEN IT GETS TO THIS ISSUE BECAUSE THERE ARE SOME TRADITIONAL USES THAT'S BEEN TRADITIONAL.

I WILL SAY, AS -- HISTORICALLY, I'VE BEEN INVOLVED ON THE RANGE FOR A LOT OF YEARS.

I'VE TRAPPED DOWN THERE BACK IN THE '70'S AND '80'S. IT WAS VERY SIMPLE: YOU GOT A PERMIT. YOU CALLED IN. THEY'D TELL YOU WHEN THE HOT AREAS WAS HOT, AND AREAS YOU COULDN'T GO TO. YOU CALLED IN, CALLED OUT EVERY DAY.

THAT PROCESS WORKED VERY WELL OVER THE YEARS, AND

I -- I'D KIND OF, MAYBE, LIKE TO GO DOWN THERE AND DO A LITTLE BIT MORE TRAPPING. IN FACT, I'M DOWN THERE RIGHT NOW, TRYING TO PUT SOME COLLARS ON SOME COYOTES, BUT THEY DON'T SEEM TO BE TOO MANY DOWN THERE, BUT, ANYWAY, I THINK THE MILITARY'S DONE AN EXCELLENT JOB OVER THE YEARS.

I'VE BEEN INVOLVED WITH THEM SINCE IN THE '70'S.

LIVED HERE MOST OF MY LIFE, AND WE HAVE A REAL JEWEL DOWN THERE; AND I WOULD THINK THAT THE COMMISSION IS REALLY SUPPORTIVE OF ALL THE ACTIVITIES THAT'S GOING ON RIGHT NOW WITH THE ANTELOPE AND THE -- I CAN SAY FOR SURE WE'VE SEEN SOME REAL PROGRESS GOING, FINALLY, AND WE HAVE SOME OF THE PEOPLE THAT IS SITTING AT THE TABLE THAT'S CREATED THAT PROGRESS. 2.39

SO FROM ME, FROM THE COMMISSION, OUR HATS ARE OFF FROM THE GUYS; THAT THE GUYS REALLY BEEN DOING A GOOD JOB, SO HOPEFULLY WE CAN WORK THROUGH THIS.

MR. JOHN CAPPS: YEAH, MY NAME'S JOHN CAPPS. I'M A MAJOR IN THE MARINE CORPS, BUT I'M HERE AS A PRIVATE CITIZEN.

I JUST WANTED TO TALK ABOUT THE RECREATIONAL SHOOTING, AND THERE IS A GROUP OF SHOOTERS WHO HAVE SOME FULLY AUTOMATIC WEAPONS -- LEGALLY OWNED, OF COURSE -- THAT HAVE SHOT OUT ON THE GOLDWATER FOR YEARS; AND MY CONCERN, UNDER ALTERNATIVE "C," IS THE SPECIAL USE PERMIT. 6.6

AND IT APPEARS THAT, THE WAY IT IS WRITTEN, THAT

RECREATIONAL SHOOTING WITH FULL AUTOMATIC WEAPONS WILL STILL BE AUTHORIZED AS IT HAS IN THE PAST, BUT IF YOU HAVE TO GET A SPECIAL USE PERMIT, YOU KNOW, MY CONCERN IS, IS THAT GOING TO BE A BUNCH OF RED TAPE, AND IS IT GOING TO CAUSE A LOT OF PROBLEMS OR IS THAT BASICALLY GOING TO EFFECTIVELY PUT AN END TO FULL AUTO USE OUT ON THE RANGE? 6.6

THAT'S MY CONCERN, AND I KNOW THAT'S SOME CONCERN OF SOME OTHER RECREATIONAL SHOOTERS WITH FULL AUTOS.

WITH THAT SAID, I GOT TO TELL YOU, I THINK THAT THE MILITARY'S DONE A GREAT JOB OUT THERE, AND THAT I WOULD LIKE TO SEE THE RANGE BEING UTILIZED FOR PUBLIC ACCESS AS MUCH AS POSSIBLE. 1.5 5.5

THAT'S ALL I HAVE.

THANK YOU.

MR. PAUL JOHNSON: MY NAME IS PAUL JOHNSON, AND I'D LIKE TO ADD ON TO MY STATEMENT. I WOULD LIKE TO CLARIFY MY EXPERIENCE AND MY OBSERVATIONS ON THE GOLDWATER RANGE. THESE ARE PERSONAL OBSERVATIONS THAT I PERSONALLY MADE ON THE GROUND AND AT VERY LOW-LEVEL OVERFLIGHTS.

DURING MY CAREER WITH THE BORDER PATROL, 25 YEARS, I WAS ON THE GOLDWATER RANGE PERFORMING DUTIES, TRACKING SMUGGLERS AND ILLEGAL ALIENS AT LEAST 500, POSSIBLY AS MANY AS A THOUSAND TIMES.

THAT'S DIFFERENT DAYS -- 500 TO A THOUSAND DIFFERENT DAYS, WHERE I WAS WORKING ON PORTIONS OF THE -- THE

GOLDWATER RANGE, AND THAT EXTENDS FROM THE BORDER -- RIGHT ON THE BORDER, ALL THE WAY UP TO THE NORTHERN EDGE OF THE RANGE, JUST SOUTH OF INTERSTATE 8; AND THESE OBSERVATIONS ARE BASED UPON FIRSTHAND, DIRECT KNOWLEDGE OF IT.

I WAS ACTUALLY OUT THERE ON THE GROUND EACH ONE OF THOSE TIMES, AND I ALSO OVER FLEW IT ON NUMEROUS OCCASIONS. THE LAST TIME WAS IN JANUARY OF 2001, WHEN I OVERFLEW IT IN A BORDER PATROL HELICOPTER, AND I THINK THE HIGHEST ALTITUDE WE WERE ABOVE THE GROUND WAS 50 FEET.

SO THIS IS VERY CLOSE, PERSONAL OBSERVATIONS; AND MANY OF THE AREAS ARE EXTREMELY REMOTE, AND THE ONLY PEOPLE THAT EVER VISIT THEM ARE SMUGGLERS, ILLEGAL ALIENS, AND BORDER PATROL AGENTS. IT WOULD BE UNUSUAL FOR ANYBODY FROM THE MILITARY OR ANY OF THE OTHER ORGANIZATIONS TO GO TO THESE EXTREMELY REMOTE AREAS. 7.1

IT'S -- THIS IS PERSONAL -- MY STATEMENT IS BASED ON PERSONAL, FIRSTHAND KNOWLEDGE.

(THE OPEN HOUSE WAS CONCLUDED AT 8:01 P.M.)

1 CERTIFICATE OF REPORTER

2 STATE OF ARIZONA)
) SS.
3 COUNTY OF MOHAVE)

4 I, KIMBERLY D. MC ANDREWS, C.S.R./C.C.R., R.P.R., DO
5 HEREBY CERTIFY THAT I TOOK DOWN IN SHORTHAND (STENOTYPE) ALL
6 OF THE PROCEEDINGS HAD IN THE BEFORE-ENTITLED MATTER AT THE
7 TIME AND PLACE INDICATED, AND THAT THEREAFTER SAID SHORTHAND
8 NOTES WERE TRANSCRIBED INTO TYPEWRITING AT AND UNDER MY
9 DIRECTION AND SUPERVISION AND THE FOREGOING TRANSCRIPT
10 CONSTITUTES A FULL, TRUE AND ACCURATE RECORD OF THE
11 PROCEEDINGS HAD.

12 IN WITNESS WHEREOF, I HAVE HEREUNTO AFFIXED BY HAND
13 THIS 10TH DAY OF APRIL, 2003.

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19 KIMBERLY D. MC ANDREWS,
20 C.S.R./C.C.R. R.P.R.

21
22
23 ORIGINAL
24
25

PUBLIC HEARING HELD APRIL 4, 2003

AJO, ARIZONA

5:30 P.M. TO 8:30 P.M.

COPY

REPORTED BY:

PAMELA L. LOHR, RPR

CERTIFIED COURT REPORTER

CERTIFICATE NUMBER 50035

Ajo, Arizona
April 4, 2003

(Whereupon, Pamela L. Lohr was appointed to act as Official Court Reporter.)

COLONEL POWERS: Okay. We will now begin the public comment portion of this hearing. Presently, I have two speaker request cards. Is there anybody who has not filled out a card and would like to? Okay, I have a couple more here.

Let me go over the ground rules for the way we will do this tonight. I will announce the name of the first speaker. Please, use the microphone that will be provided for you and speak clearly so that everyone can hear your comments and the court reporter can record them. Please, speak only after I have recognized you and address your remarks to me. When making an oral comment, please, clearly state your name and the name of the organization, if any, which you are representing before you begin your comment.

Please, do not provide any other personal information such as your home address and phone number when making an oral comment. Your oral comments will be used to develop the

transcript and permanent record of this meeting. This transcript may be published in the final EIS.

If you'd like to know how to obtain a copy of the final EIS or associated documents, you may state on a written comment card or add your name and address to the mailing list. Private addresses provided will be compiled to develop the mailing list, however, only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the final EIS.

I'll recognize each person for up to five minutes. That's so everyone will have an opportunity to be heard this evening. If you have more comments than you will be able to present in five minutes, please, prioritize your comments to be sure that you cover the most important point first. If I call someone who is not in the room, I will put their card at the bottom of the stack and call their name at the end.

With that, I will call the first name: L.J. Dutcher, I believe it is.

MR. DUTCHER: I'm L.J. Dutcher and what I wanted to talk about was public assets. There is

a significant area of the Barry M. Goldwater --

COLONEL POWERS: Sir, can you wait, because the court reporter can't hear what you're saying. If I could ask, does the microphone extend up here?

Sir, why don't you use this one. Come right up here, sir.

MR. DUTCHER: So as I said, public assets. Significant areas of BMGR are presently closed to the public and more likely -- more likely to be closed; proposed 19, that's for sure.

These restrictions need to be challenged as the military allows recreation use of public land. There are a number of mechanisms, special use permits for public lands, so on and so forth, that would allow more reasonable public access for recreation use of lands without compromising the public safety or the military training mission. 1.25

Now, unwarranted road closures: Several of the plans seek to close a varying array of existing roads. Many of the these roads are necessary to provide reasonable access to large expanses of the range, it's remote mountain ranges and the adjacent Cabeza Prieta Range. Some redundant roads can and should be closed but many 1.4 1.10 1.23

that have been identified for closure simply are not justified. Please, help us remind the DOD that this area is not a park or a wilderness area but a bomb range. Keep the roads they have open and only close those that are redundant. 1.4 1.10

Wildlife management, wildlife waters: The push is being made to minimize rather than extend wildlife management and wildlife enhancement activities. Tuley alternatives seek to place moratorium on wildlife water developments until the definitive study proves the value and benefit. This is absurd. There is more evidence suggesting that water is a benefit than there is to the contrary, if any at all exists. Consesequently, the onerous and burden of proof should be the other way around. Our wildlife preserves deserves more responsible management than this. 2.18

COLONEL POWERS: Thank you very much. The next person I would ask to come up is Marvin Silva.

MR. SILVA: My name is Marvin Silva. I've never spoke with a mic before. My comment addresses area B. And the area in question is the area by the lineup road as we exit from Highway 85 crossing the Ten Mile Wash. There's a gate there 1.23

that's locally called the Child's Ranch Gate. According to the proposed map on the wall, that gate would be closed and we would have to go all the way to Fifteen Mile Wash, or mile post 20.2, to gain access to that southern portion. Right now there is a road that parallels the Lineup Road to the north of it that has been in there for, at least, 30 years or longer, as long as I have been here, and that should remain open and give us access from the south without having to go all the way to the north and then backtrack down. This would be easier for Arizona Fish and Game to monitor the Battlemony tank that's on the southern reach that's, approximately, ten miles in from the road.

And it also makes the area much more enjoyable for the people who do have access and permits to use the range. Thank you.

1.23
1.29

COLONEL POWERS: Thank you. Next, I will ask Ralph Delisle.

MR. DELISLE: My name is Ralph Delisle. I haven't lived in Ajo for long but I've been out in it for several years. I guess I've just got two general comments.

The first is this no action alternative;

11.25

when I look at that and I think what has been done since a few years that I've been out to Ajo and out in the area, particularly, the Cabeza Prieta, it seems to me to have been a lot of action in a no action area. I guess my first thought is, so many things have been done already as the need arises, why do you have to go through this great big thing? If something comes up, changes will be made. 11.25

And my second major comment is I was looking over these four alternatives, A, B, C and D, but I think I heard that, well, there is a fifth one that we don't know about and we haven't read any details on. And you're going to take input on something that we don't know about and haven't read and then you're going to take our input and other's inputs and then come up with the final proposal which you're going to generate and pass out. And I guess I'm disturbed that all this paper printing and all this effort was made and we can't get to see this fifth strategy or the proposed strategy. Proposed strategy to me means that's what you have decided, you're going to do it anyway. Thank you. 11.26

COLONEL POWERS: And last, I have a card from Morris Nelson.

MR. NELSON: My name is Morris Nelson.

My home is in Olympia, Washington and I have been a resident of Arizona, or Ajo, Arizona for 13 years now and my concern is keeping the roads, existing roads, opened up by Hap Mountain, up in the area there. 1.23

I'd like to know now the purpose of this meeting tonight; is that to close the existing roads or what?

MR. DELISLE: You can't ask questions.

MR. NELSON: What is the purpose of this meeting here? Is it to close existing roads out there or leave them open?

COLONEL POWERS: This is your forum to make your public comments --

MR. DELISLE: You're not allowed to ask questions.

COLONEL POWERS: You can ask all questions you want, sir. After this public comment portion where you ask your questions, there will be people here and informally will be able to answer them for you.

MR. NELSON: So you can't answer my question if it's going to be the purpose of the meeting to close the roads or keep them open? You can't question my question?

COLONEL POWERS: Go ahead and continue your comment, sir.

MR. NELSON: Well, you know, this beautiful country out there -- I enjoy going out there and next week I'm going to go out there with my grandchildren to Hap Mountain and show them the area. We were there last year and they loved it and it is beautiful country back there. And you know my friends, God created this country for us to enjoy and not to destroy, but to enjoy. And the only way we can enjoy this beautiful country is by going out there in our four wheel drives or two wheel drives or motorcycles, not motorcycles but ATVs and enjoy the country. It's beautiful out there. And I think the existing roads should remain open, should remain open.

You know, each one of these people up here make a payment on that land out there every month; and even you guys make a payment on that land every month in income tax. When you make a payment on something that means you have partly ownership in it.

We own part of that land out there so why are you trying to keep us off it, so we can't go out there and enjoy it?

1.5
10.3
10.4

And I still would like an answer if this meeting is to -- tell me. Tell me.

COLONEL YKEN: Finish your comments.

COLONEL POWERS: Finish your comments and he'll respond.

MR. NELSON: Okay. I'd just like to know whether you plan on closing the land out there, the existing roads, or are you going to leave them open? That's my question.

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1.25

COLONEL POWERS: Are you done with your comments, sir?

MR. NELSON: For now.

COLONEL POWERS: For the record, you are again -- I'm sorry.

MR. DELISLE: My name is Ralph Delisle.

COLONEL POWERS: Ralph Delisle. Go ahead.

MR. DELISLE: Thank you. Just one comment, my third comment and Nels made me think of it. We're all citizens of the United States of America. I think some of us may be aliens of various kinds, but I saw on television last night that a -- a singer, a real old time singer, Woody Guthrie and the one thing he said was, "this land belongs to you and me." I got a feeling it's not

for very long. Thank you.

COLONEL POWERS: Before I turn the microphone over to Colonel Yken, is there anybody else who would like to speak who has not yet who would like to fill out a speaker request card? I see one individual there. While that individuals is filling out --

MR. NELSON: Do we get a second chance? Do we get a second chance?

COLONEL POWERS: Would you like second chance?

MR. NELSON: After hearing his comments, I will.

COLONEL POWERS: First I'm going to let this gentleman speak. This gentleman, for the record, is Lee Price.

MR. PRICE: I do need to give some of my family history and that will help.

MR. DELISLE: You're not allowed. You're not allowed.

MR. PRICE: I'm not allowed?

MR. DELISLE: No.

COLONEL POWERS: Sir, you have five minutes to speak and you can say whatever you want, just don't give me your home address and phone.

MR. PRICE: You got five hours? My name is Lee price. And I'm not representing anybody except myself. And first I want to compliment the Bureau of Land Management. I don't know if they have any officials here, but they do a good job of managing the range as far as the livestock goes.

2.3

And now, I want to speak on behalf of myself and a lot of the old timers. I have been here 74 years, born and raised. Okay. I don't know if it's allowed or not, but it's there now.

A lot of the old timers, they drilled wells out in this area and I've worked with some of them. And now they're talking a lot about this Pronghorn antelope. It's the one that's the big problem here, I think, primarily.

And out to the west of Range 1, there is an area that was known as Drift Fence. In the past, there was a Drift Fence Well there that the Childs had drilled there. And I worked cattle with them there and I have seen antelope there, okay, 20 head in a bunch.

Okay. Now then, I think antelope, they're going to migrate just like these aliens. The grass is greener on the other side of the fence. So we have been 13 years here now is my

guess in a bad drought situation. We just got some rain. We have got some feed on the range and the Bureau of Land Management is doing a good job of managing it. They tell you how many head of cattle you can run at certain areas. And if you want to expand, you have to move to another area where there's feed. And when the feed is down, they will tell you cut your heard down. 2.3

But the antelope, if they were -- if the people that are really concerned about the antelope was to take these wells like, for instance, just an example, this Drift Fence Well, and reactivate it. It won't take much because I'm a licenced well driller so I know what I'm talking about, but reactivate that well and pump some water there and do like some of the ranchers do and haul in hay for those animals and substitute hay for the feed that's not there and bring them through. That's not only for antelope, but the birds comes in and they eat what the cows don't eat or the antelope; the rabbits, the game. There is not a person that lives in this town now that won't say they haven't seen javelina come into town, deer coming into town, come into their own back yards along with the aliens. And they're just looking for feed and they 2.42

want to exist and you can't blame them.

If they would supplement their feed like a lot of the ranchers do, namely myself, and if you want to keep your heard without getting rid of it because they're accustomed to the area they're on. 2.42

Fences need to be maintained. At my age, it's getting hard for me to maintain them. I used to maintain one under the Ten Mile Bridge that the state or someone was not maintaining where cattle would come from the east side and get over on the Barry M. Goldwater Range. And I remember people that the Childs used to lease out to, the Connleys of Gila Bend, and they'd bring cattle in. I used to help maintain that fence. How is my time, sir? 2.56

COLONEL POWERS: You got a couple minutes.

MR. PRICE: I'll talk a little faster then. Well, that's my main thought. And the other thing is, I don't know if they have any people here that's representing the Border Patrol, but I have a comment to make on that subject. The Border Patrol are using, or have in the past used these, what do they call it, these four wheel drives, all terrain vehicles. 7.3

Okay, now, those things when they're tracking aliens, they can't watch where they're going and cut signs at the same time. If I'm out there on horse back, I can cut sign. I don't worry about my horse. He is not going to step in a gopher hole and he's not going to run over a sticker or something that's going to give him a flat tire or something.

So consequently, I think if they was to get horses and locate them strategically, they would cover a lot more territory and save a lot more on the terrain. They used to do in the past. I don't see why they can't do it now. My God, think of the savings it would be in the price of gas and the maintenance of the vehicles as compared to a few head of horses strategically located along the border. It could really save wear and tear on that. 7.3

And I don't know, I just can't think of anything else more at the time moment.

COLONEL POWERS: Okay. Thank you, sir. Okay, I'm going to turn the microphone over to Colonel Yken. I know he would like to respond to Mr. Nelson.

COLONEL YKEN: What I would like to do

for Mr. Nelson and Mr. Delisle is just, hopefully, provide some clarification which I think, which I hope or trust will answer your questions.

When I gave the presentation, it was rather lengthy, but let me try to synopsize it such that we can pull out the bullets, should we say.

I talked about the initiation of the environmental impact survey which is a process we have been going through. And the fact that we had public scoping meetings, and in fact, we sat in this in very room August of '00 and had the first or one of the first public scoping meetings for the EIS and INRMP at the time.

As a result the public scoping meetings, we went to six different communities. Those that had -- would be the most affected by the use of the Goldwater Range -- in other words, we went to other places like Sells and Gila Bend and Yuma and Tucson and, I believe, Glendale for representing all of the greater Phoenix area.

After the public scoping meeting, we then went to the public workshops where we looked at seventeen different resource management categories. And, for example, a resource management category would be roads. Okay. We

took -- at those public workshops, there are no concerns of the resource management categories where there's virtually no, you know, concern from interest groups on either side as to what the management strategy is that is proposed. Other strategies or other management resource categories like roads are obviously of a lot of concern to different constituents.

Now, with respect to trying to tie this together for you; after the workshops, we then went back and after having received -- the public participated in the workshops, we reviewed the management -- all seventeen resource management categories and they devised a continuum, in other words, A, B, C, and D, and discussed what would happen in each of the resource categories if A or B or C or D were picked and we asked and got public input at that time.

We are at the point where after having received public input, both during workshops and comments were consistent with the principles we talked about, you know, military, natural, cultural resource management and multi-purpose public access were the three keys, if you remember those. We then went through the process of preparing the

took -- at those public workshops, there are no concerns of the resource management categories where there's virtually no, you know, concern from interest groups on either side as to what the management strategy is that is proposed. Other strategies or other management resource categories like roads are obviously of a lot of concern to different constituents.

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We are at the point where after having received public input, both during workshops and comments were consistent with the principles we talked about, you know, military, natural, cultural resource management and multi-purpose public access were the three keys, if you remember those. We then went through the process of preparing the

draft INRMP based on our management goals as well as public input.

What you have behind -- so that those are the four strategies, A, B and C and D. Okay. And now the proposed management strategy is a combination of the overall seventeen resource management categories. So if I could illustrate, again, rather than just refer to a specific one, in category one, we made -- may have management strategy B. In resource management category two, we may have strategy C.

In some cases, for example roads, within a resource management category where we have also subdivided the range into seven different areas and so for parts of the range, we'll say, okay, like for areas two and three, I can't remember but I'm just for illustration points, four of those seven sub-areas on the range, we are proposing management strategy B, for example, for areas one and two, and C for areas three through seven on the range.

So the combination of what we are doing is those seventeen resource management categories and within each category there is a set of management strategies that in some cases are even subdivided within a category.

To further address the issue of whether this meeting is to close roads, no. What we are doing at this meeting is taking public input comments from you as to whether you are in favor of the proposed management strategy. If you look behind you, you'll see on the different placard back there proposed management strategy -- the proposed management strategies are those areas highlighted in yellow. I think that answers Mr. Delisle's question.

MR. DELISLE: No. No. Put it right there in the fifth column.

COLONEL POWERS: Okay. I have one new card here from Donnie Ebann. Sir, if you could come on up. Can I ask you to spell your last name for the record.

MR. EBANN: E-B-A-N-N. My name is Donnie Ebann. I grew up here in Ajo. I have gone out on that area B since I was a little kid. Now, I'm a big kid and I'm still going out there.

In looking around at the different displays, I'm noticing that part of this is for environmental impact and a couple things I have noticed going out there and I don't see any mention to it as an impact is from the wild burros. 2.57

They're really tearing up the environment out there. And the illegal traffic, they're trashing the place. They leave litter everywhere and make new trails. Also the Border Patrol like Mr. Price said, they're cutting tires and they're driving off road. 2.57 7.1

Where I'm getting with this is I'd like to urge the deciding committee to stick with alternative A or B and focus on the real problems that are causing the environmental impacts out there, which in my observations, I know there's a lot more factors than that, but it is the wild burros and illegals and people driving cross-country. That's all I have. Thank you. 1.5 11.10

COLONEL POWERS: Is there anybody else who has not yet had an opportunity to speak who would like to fill out a request form and speak? Okay. Apparently, there's none, so now I'm going to ask those who have already spoken if they would like another five minutes. I see Mr. Price.

MR. PRICE: Thank you. At my age I'm having a little memory problem so I forgot one item in particular. This is of interest to the business people in this town. 10.2

We have what we call snow birds coming

in here. And like this gentleman says, he'd like to take his family out there. And I don't know if he has been here for sometime, but a lot of them just come in primarily because of the climate and the access they have to the desert out there. So I think that they ought to take that into consideration.

I haven't read all your plans, you know what I mean? I just don't have time. I'm too busy doing other things. But if they would take it into consideration that they could affect the money that's coming into this community. Since the mine shut down, there is nothing going on but the locals and the snow birds as I call them. And if you restrict them so bad, you know what I mean, about getting to go to certain areas, why, they're going to stop coming down here and it will affect the business and economy of this town. That's the other thing. And if I think of another one, I will raise my hand again.

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COLONEL POWERS: Now I see Mr. Nelson. Would you like to speak? Or Mr. Delisle?

MR. DELISLE: This is Ralph Delisle again. Going on with what Mr. Price said about the protection of the wildlife out there. We have gone

out several times out to Devil's Highway and other places and we have seen a lot of wells quite inactive. Some of these areas maybe aren't frequented by the Pronghorn or other endangered species and maybe they are. But I often wondered why, to Mr. Price's point, Papago Well -- it is Papago Well, Tuley Well and even Bates Well and some of those other wells, why they can't be reactivated? It doesn't take too much; especially Tuley Well. All it takes is a new guzzler and it's a good active well -- the well there right now.

And to Mr. Price's point, if there is nothing to go graze on, it seems like we could provide some kind of food to the Pronghorn. I think we do that to other endangered species, the American Bison and some other animals in other states. We provide supplemental food.

2.42

And someone else said something about illegals and the aliens and the Border Patrol. I don't think there's any member represented by the Border Patrol here but I can tell you one thing, I've seen those Border Patrol guys go. I've got a Jeep and I thought it was a good roadworthy Jeep. And I think, well, those Border Patrol guys are really smart. They're getting those new Jeep

Wranglers. And I see a lot of Jeep Wranglers on trailers being towed and got Border Patrol signs all over them because those guys don't know how to drive off the roads.

Moreover, and I go down any road and I see -- I can see all kinds of tracks where the Border Patrol just takes off, lickety-split, and talk about somebody tearing up vegetation and making some new roads -- if anybody made new roads for somebody to track on and follow, it's the Border Patrol because everybody else sees where they're going and they will go too thinking maybe that's a new road. 7.3

And also the area around, some other people talked about, Range B, gee, that's so great. I don't see that much wild animal, but nobody has ever said anything about the Pronghorn being there. I know one good thought about that area because I saw some numbered signs out there. I don't know who put those up. Was it the military or the BLM? It's those little red, or dark maroon signs with numbers on them. And on the Range B map that the Cabeza Prieta put out, they have got those numbered and people, a lot of people get those maps and they follow those roads because they figure those are 1.16

roads that are acceptable for them to use. Gosh, I sure hope that those roads for sure don't get closed. They might. I hope they don't. 1.16

COLONEL POWERS: Okay. Thank you. I'd like to remind everyone that you may submit additional comments in writing either tonight or you may mail them in to the address listed on the comment form by May 7th. Agency representatives will stay in the area until 8:30 if you would like to look at the presentation boards and ask more questions.

Once again, thank you very much for --

MR. NELSON: Can I have a little more time? Please, Colonel, sir.

COLONEL POWERS: Mr. Nelson, I'm going to give you five more minutes and then we are finished.

MR. NELSON: Thank you. You have a good sense of humor. You know, I'm 80 years old. And I've been going to these public meetings for over 40 years about land closures and things like that. And you government people don't listen to the citizens to get their input. By law, you have to have a public meeting. But by law, you do your own thing. You don't listen to us and so we don't

trust you. We don't trust you. Really, we don't trust you.

There is a few people here and if the people in Ajo really believed you that you would do what you're going to do, this place would be jam-packed, but they don't trust you so why should they come to meeting when you're not going to do what they want done? Really, colonel, that's right.

And for 40 years I have been doing this here and I have been going to these meetings like this and it's disgusting. We just don't trust what you say or -- you're different than the people I've dealt with. This is the first time I've seen you people. I hope you do what's right for the people here. I hope you do what the people in Ajo want you to do. Go out and leave that land open, the existing roads open; the existing roads open, so the people in Ajo can go out and enjoy this beautiful country. Thank you. Okay. And a little bit afterwards, I want to talk to you, please.

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COLONEL POWERS: Thank you for your participation in this meeting tonight. It's been my pleasure to preside over this hearing tonight and this meeting is now adjourned.

(AT THIS TIME, THE MEETING WAS ADJOURNED)

C E R T I F I C A T E

I, PAMELA L. LOHR do hereby certify that I made a stenotype record of the proceedings had in the foregoing matter; that the said stenotype record is full, true and accurate; and that the foregoing pages constitute a full, true and accurate transcript of the same to the best of my skill and ability.

PAMELA L. LOHR, RPR
Official Court Reporter
Certificate No. 50035

12.4 RESPONSES TO COMMENTS ON THE DRAFT EIS

1. Motorized Access and Unroaded Area Management

Comment Summary 1.1: The public should be allowed to drive in accessible dry streambeds and wash bottoms that are located in areas of the range open for public use because:

- this activity would not harm wildlife or the environment
- all evidence of such use (vehicle tracks) would be erased by the next storm water flow
- washes would provide needed access to areas that are otherwise unreachable by vehicle and, accordingly, a large segment of the public

Commenters 1.1: ADBSS, BD, GK, JEM, JF, JFK, JK, MM, PM, TP, YVRGC

Response 1.1: Information addressing the policy for driving in washes under the revised proposed action and alternatives has been added to Section 3.4.4. The potential impacts of alternative management strategies for driving in washes to resources are addressed in Sections 5.2.5, 5.3.5, 5.5.5, 5.6.5, 5.12.5, and 5.16.5. Some additional information has been added to supplement the impact analysis for water resources (Sections 5.3.5 and 5.3.18), to and cultural resources, (Section 5.16.5). Also see Responses 1.2 and 1.3.

Comment Summary 1.2: Dry streambeds and wash bottoms should be closed to motorized vehicle use because this activity would degrade wildlife habitat, disturb/harm wildlife, and damage cultural resources.

Commenters 1.2: CBD, CM, DOW, JN, LL, LWF, RE, RH, SC, SRM, TA, YA

Response 1.2: The comment to prohibit public motorized vehicle use of dry streambeds and wash bottoms addresses the same issues, although from a different perspective, as does the comment to allow public use of washes. See Response 1.1.

Comment Summary 1.3: The comment states: "For each of the alternatives, we recommend that recreational driving in dry washes be restricted to the extent possible to ensure the protection of water quality and beneficial uses from adverse effects. Adverse effects include increased erosion and sedimentation, and the discharge of hydrocarbons (fuels, oils, greases) from recreational vehicles. The EPA recommends that the final EIS and ROD address the feasibility of mitigation to restrict or prohibit recreational driving in dry washes. The final EIS should also address the extent to which recreational driving in dry washes is consistent with State-adopted, EPA-approved water quality standards and Section 313 of the Clean Water Act."

Commenter 1.3: EPA

Response 1.3: Supplemental information regarding the potential adverse effects to water resources from the revised proposed action and alternatives regarding motorized travel in washes was added to Section 5.3.5. The modifications address water quality and Section 313 Clean

Water Act requirements. Section 5.3.5 also was enhanced with additional discussion of the potential effects from recreational driving on surface water drainages, increased erosion and sedimentation, and the discharge of chemical fluids from vehicles.

Controlling both government and public driving in dry washes is central to the current and future management of vehicle use and environmental protection within the BMGR. The BMGR generally is an undeveloped, wildland environment in which nearly all existing roads were established by vehicle use rather than through engineering design. Locations where the existing roads cross or traverse segments of the natural drainage system are generally aligned along the most suitable, at-grade route. Very few of the road segments within the BMGR traverse washes for any substantial distance. In these respects, the BMGR road system is generally similar to those found in national monuments, national forests, national wildlife refuges, and BLM-administered public lands near the BMGR and across the arid Southwest. Public driving across or in washes on the BMGR is limited only to through travel. No washes are specifically designated or used as off-road vehicle play areas.

Public recreation on the BMGR is sanctioned by both the MLWA of 1999 and the Sikes Act to the extent that this activity is consistent with the military mission and safety requirements. Since public use of the range cannot be summarily banned, the only way to mitigate the potential adverse effects of public driving on existing roads that cross or are in washes would be to eliminate all at-grade road beds that either cross or follow washes. This objective would require eliminating at-grade, road-wash crossings by installing culverts or bridges and developing graded road cuts through upland terrain to circumvent road alignments in wash bottoms. Engineering such a road system to support recreation on the BMGR would be cost prohibitive. More important, however, is the fact that culverts and bridges would not be compatible with the operation of the range as an air-to-ground weapons training area.

Rather than addressing the potential effects of public driving in dry washes through mitigation measures, this issue is addressed in the EIS through the analysis of road system alternatives. Alternative Management Strategies A and B would both allow recreational driving in designated washes when those washes are dry. Alternative Management Strategies C and D would restrict motorized public travel in all washes except where the wash is a designated part of the road system open to the public and is dry. Alternative A, the no-action alternative, would retain the existing BMGR road network and would not expand the system. Thus, this alternative would not have the potential to expose washes that currently are not a part of that system to recreational vehicle traffic. Alternative B would allow for a potential expansion of the existing road network and, consequently, could result in an increase in the number of washes to exposed recreational vehicle traffic. Both Alternative Management Strategy C (the proposed and preferred alternative) and Alternative Management Strategy D would substantially reduce the existing road network. Correspondingly, both Alternative Management Strategies C and D would eliminate recreational vehicle traffic in washes that are currently exposed to this activity. The environmental consequences of this range of alternatives, including potential effects on water quality, are reported in Sections 5.2.5, 5.3.5, etc. through 5.20.5. The potential risk of adverse effects resulting from recreational driving in washes is acknowledged, but significant adverse effects would be unlikely, particularly given the limited distribution and scale of such driving on the BMGR under the preferred alternative.

Comment Summary 1.4: Several commenters would support selection of the proposed action, Alternative Management Strategy C, provided in the draft EIS for motorized access and unroaded area management if Alternative C is modified to incorporate additional public access roads as proposed by the Yuma Valley Rod & Gun Club. The Yuma Valley Rod & Gun Club identified 26 specific changes that would add 62 existing roads/road segments to Alternative C for retention and public use under the proposed action. This proposal includes allowing public use of two roads that were identified as for government use only under the proposed action in the draft EIS. If Alternative C is not modified as recommended by the Yuma Valley Rod & Gun Club, the commenters would prefer the selection of Alternative Management Strategies A or B as the preferred alternative for managing the BMGR road network.

The Arizona Desert Bighorn Sheep Society also put forward a proposal that included most of the roads identified by the Yuma Valley Rod & Gun Club, but that also identified 14 additional existing roads, which were not incorporated in Alternative C, for retention and public use under the proposed action. Together, the Yuma Valley Rod & Gun Club and the Arizona Desert Bighorn Sheep Society proposals would retain 97 more miles of road in the BMGR road system than would the proposed action in the draft EIS. The Arizona Desert Bighorn Sheep Society, which supports Alternative A if the proposed action is not modified, also asks that all roads identified as for "government use only" be open to the public. The commenters generally indicated that the roads identified by the Yuma Valley Rod & Gun Club and Arizona Desert Bighorn Sheep Society were not redundant; the Core Planning Team used redundancy as a criterion to identify roads for closure under the proposed action.

These two organizations and others expressed concerns that some of the closures would curtail sustainable public access and needed wildlife management access.

A number of residents in the Ajo area raised particular objections to proposed road closures in Management Unit 6 (also known as Area B).

Commenters 1.4: ADBSS, AGFD, AK, AL, ARP, BAF, BBE, BD, BDO, BRH, CCM, CDM, DD, DF, DGR, DJB, DOI, EC, EDF, EFO, EM, EP, GR, IE, JEM, JF, JFC, JM, JMI, JR, JV, LD, LH, LS, MH, MN, MW, NS, NW, PF, PM, TP, YVRGC

Response 1.4: USFWS and AGFD concurred with the general concerns of these commenters that some additional access should be provided and these agencies believe that the level of additional access being proposed would be ecologically sustainable.

In response to these comments, and in recognition of comments received from others who prefer either Alternative Management Strategy C or D, the Core Planning Team re-evaluated the specific roads identified by the commenters and determined that to retain some additional existing public access would be consistent with the military purposes of the BMGR, security and safety considerations, and sustainable management of natural and cultural resources; consequently, the proposed action in the final EIS was revised. The Core Planning Team review also reappraised government requirements for road access to the range and found that some road segments that had been identified for closure in the draft EIS proposed action are now important to support military or other government purposes. These roads are proposed for retention in the

revised proposed and preferred action, which is described in detail in Section 3.4.4.2 of this final EIS. The differences between the revised proposed action and the draft EIS proposed action also are described in Section 3.4.4.2.

Comment Summary 1.5: The commenters encourage the selection of Alternative Management Strategies A or B for motorized access and unroaded area management. Some of these comments did not specifically mention these alternative management strategies, but made consistent general statements such as, "I support keeping all the existing roads open" or "Do not close any public use roads."

Commenters 1.5: AD, ADBSS, AM, AN, ARP, BA, BB, BC, BH, BHE, BLH, BM, BMA, BCC, BR, BS, CC, CDM, CG, DC, DEB, DG, DGR, DJB, DMM, DR, EFO, EP, ES, FP, GK, GR, GWB, HVZ, IE, JBR, JD, JEM, JFK, JG, JH, JK, JF, JM, JMI, JPM, JR, LF, LO, MH, MM, MN, MW, NS, NW, PH, PF, RA, RAB, RB, SB, SH, SLB, SLO, TH, TT, YVRGC

Response 1.5: Your support for Alternative Management Strategies A or B, as presented in the draft EIS, is noted. Please be aware that, based on other public comment as well as a re-evaluation of the BMGR road network, public access needs, and resource conservation/ protection effects, the revised proposed and preferred alternative in the final EIS includes more existing roads that would be retained for public use. The rationale for these additions is provided in Section 3.4.4.2.

Comment Summary 1.6: The commenters encourage the selection of the proposed action, Alternative Management Strategy C, for motorized access and unroaded area management.

Commenters 1.6: CBD, CM, RS

Response 1.6: Your support for Alternative Management Strategy C, as presented in the draft EIS, is noted. Please be aware that, based on other public comment as well as a re-evaluation of the BMGR road network, public access needs, and resource conservation/protection effects, the revised proposed and preferred action in the final EIS includes more existing roads that would be retained for public use. The rationale for these additions is provided in Section 3.4.4.2 EIS.

Comment Summary 1.7: The commenters encourage the selection of Alternative Management Strategy D for motorized access and unroaded area management. Most of these commenters believe that road closures would be beneficial to the environment.

Commenters 1.7: CBD, CM, DOW, JN, LL, LWF, RE, RH, RS, SC, TA, YA

Response 1.7: Your support for Alternative Management Strategy D, as presented in the draft EIS, is noted. Please be aware that, based on other public comment as well as a re-evaluation of the BMGR road network, public access needs, and resource conservation/protection effects, the revised proposed action and preferred alternative in the final EIS include more existing roads that

would be retained for public use. The rationale for these additions is provided in Section 3.4.4.2. Potentially beneficial environmental consequences that could result from the selection of Alternative Management Strategy D for the Motorized Access and Unroaded Area Management resource element as compared to the proposed action are noted in Sections 5.2.3.2, 5.3.3.2, 5.4.3.2, 5.5.3.2, 5.6.3.2, 5.7.3.2, 5.8.3.2, 5.9.3.2, 5.10.3.2, 5.11.3.2, 5.12.3.2, 5.13.3.2, 5.14.3.2, 5.15.3.2, 5.16.3.2, 5.17.3.2, 5.18.3.2, 5.19.3.2, and 5.20.3.2.

Comment Summary 1.8: Do not restrict existing or new roads to government use only. All roads should be open to public use unless there are specific compelling safety or security purposes to restrict them to government use only.

Commenters 1.8: ADBSS, DOI, JEM, JR, MH, YVRGC

Response 1.8: As identified in Response 1.4, the revised proposed action and preferred alternative in the final EIS for motorized access supports additional public use of existing roads and potential public use of the proposed Cabeza Prieta NWR bypass roads. For those roads that would remain for government use only, the Core Planning Team judged that there continues to be important law enforcement or resource protection needs to propose that some roads be limited to government use only. The revised proposed and preferred action, as well as the differences from the draft EIS proposed action, are described in detail in Section 3.4.4.2 of this final EIS.

Comment Summary 1.9: Conserve roadless areas, increase the size of these areas, and revegetate/rehabilitate unneeded roads and damaged areas.

Commenters 1.9: CBD, CM, DOW, JN, LWF, RH, SC, TA, YA

Response 1.9: As addressed in Section 3.4.4, the proposed action, which is also the preferred alternative, and Alternative Management Strategy D would provide special support to the conservation of unroaded areas of 3,000 acres or more, consistent with military mission requirements, and would close redundant or otherwise unneeded roads, which would increase the size of some unroaded areas. Although the preferred alternative would especially target conservation of unroaded areas of 3,000 acres or more, it is the policy of the Air Force and Marine Corps to protect all areas within in the BMGR from unnecessary and unauthorized activities that would cause further habitat fragmentation. Prevailing policies, which would be continued under all alternatives, against unauthorized off-road driving or road proliferation will continue to promote conservation of unroaded areas throughout the range.

Comment Summary 1.10: The commenters all support closure of redundant roads but vary widely in their viewpoints as to what constitutes redundancy. Some commenters believe that all roads other than those needed for official military missions should be closed; others find that providing road access for sustainable public use alone is a legitimate management purpose and such roads would not be viewed as redundant.

Commenters 1.10: ADBSS, ARP, BBE, CBD, DFR, DOW, JEM, JF, JM, JN, LB, LD, LWF, MH, PG, RH, RS, SC, TA, YVRGC

Response 1.10: The criteria and process for defining the range of four alternative management strategies and the proposed action for the BMGR road system and public access to this system are described at various points in the EIS including Sections 1.8.2, 3.2.2, 3.2.3, 3.3, and 3.4.1 through 3.4.4, The consensus of the comments received during scoping and the public workshops found the range of road system alternatives carried forward for analysis in the EIS to be reasonable and adequate. Alternative Management Strategies C and D would reduce redundancy within the road system to different degrees in accordance to the criteria established for these alternatives. Your comments regarding redundancy are noted and were taken into consideration in the revision of the proposed action and preferred alternative, which is described in Section 3.4.4.2.

Comment Summary 1.11: Manage/do not manage roadless areas as Wilderness.

Commenters 1.11: AF, BBE, CBD, DOW, JM, JN, LF, LWF, SC

Response 1.11: As noted in Section 3.5 (Alternatives Considered but not Carried Forward in Detail), an alternative that would emphasize environmental preservation management in excess of the level of resource protection and conservation represented in Strategy D was considered to be outside the reasonable range of alternatives for the proposed INRMP.

Comment Summary 1.12: Do not limit the number of vehicles that would be permitted in a single party.

Commenters 1.12: ADBSS, BD, DM, EF, GWB, JEM

Response 1.12: Your comment is noted; the alternative management strategies present a reasonable range of limits on the number of vehicles that would be permitted in a single party, without a special use permit exception, that vary from 49 under Alternative Management Strategy A to 9 under Alternative Management Strategy D. None of the alternatives considered in the EIS would prohibit a single party from having a number of vehicles in excess of the limit. Rather, the stipulation is that the number of vehicles in any single party could only exceed the limit when authorized by special use permit that would provide the Air Force and Marine Corps with the information and opportunity necessary to work with the applicant party to ensure that prudent measures would be followed to avoid or minimize natural and cultural resource impacts.

Comment Summary 1.13: Manage the BMGR road network and enforce road closures by restricting drivers to roads signed as open for public use.

Commenters 1.13: ARP, CBD, DOW, JN, LWF, PL, SC, SH, TA, YA

Response 1.13: A variety of methods are available for managing the BMGR road network and enforcing road closures including but not necessarily limited to providing visitors with maps and other information, when they receive their permits, that signify roads that are open for their use; posting route intersection markers that correspond to intersection numbers on the official visitor maps; posting routes that are open; posting routes that are closed; and, if necessary, constructing physical barriers to routes that are closed or physically obscuring the presence of these routes at intersections. Some additional information about emphasizing the use of signing only for roads that are open for use has been added to Section 5.12.5.1.

Comment Summary 1.14: Some roads have historical or traditional significance, such as routes to historic mines or tanks or through mountain passes. Do not close these historically significant roads to public use.

Commenters 1.14: MH, YVRGC

Response 1.14: Some BMGR roads, such as those to historic mines or El Camino del Diablo, have apparent historic value, but no assessment of the historic significance of the range road network is available. As reported in Response 1.10, the principal focus on developing the motorized access alternatives was on the road redundancy, although some specific roads or road segments where identified for closure under the proposed action because of known cultural resource vulnerabilities. Roads with historic significance may be closed through the implementation of the proposed INRMP; these routes, however, would not be obliterated and would remain available for public exploration on foot if within areas of the range that are open to the public. Closure also would not preclude the opportunity to reopen a historic route with historic and recreational value to public vehicle use through periodic INRMP updates.

Comment Summary 1.15: There are no alternatives that would increase public access.

Commenters 1.15: ADBSS, ARP, AM, BB, BBE, BR, BS, CDM, CG, DG, DGR, JBR, JEM, LB, LO, LWF, MW, RH, RS, SC, YVRGC, NS, NW

Response 1.15: Alternative Management Strategy B offers potential opportunities to increase motorized public access beyond current levels as follows:

- the foreseeable need for and generalized effect of developing additional roads for motorized public or agency use would be evaluated in general terms; proposals for construction of such roads would be reviewed in detail in accordance with NEPA and other regulatory requirements and on a case-by-case basis
- vehicle-based camping would be allowed within 100 feet of existing roads designated as open to public use (rather than 50 feet as with the existing condition and all other alternative management strategies)
- the need for and effects of allowing public ORV travel in designated areas would be evaluated

- motorized public travel would be allowed in designated washes, when dry (whereas currently driving in washes that are not an integral part of the road network is not sanctioned)

Alternative Management Strategy B did not include proposals for specific new roads except for 7 miles of road to bypass the Cabeza Prieta NWR and Wilderness.

An alternative that would increase public access, beyond that offered by Alternative Management Strategy B, was considered but not carried forward for detailed analysis as explained in Section 3.5.

The alternative selection criteria, provided in Section 3.3 and Table 3-3, are consistent with the provisions of the MLWA of 1999 and the Sikes Act concerning multipurpose public use. The provisions of both of these acts make it clear, however, that the only designated purposes of the range are national defense and that public use must be consistent with those purposes. These acts do not require the Air Force or Marine Corps to promote increased recreational use of the range, but instead require that they provide for use that is consistent with military operations and ecosystem sustainability (DoD Instruction 4715.3 Paragraph 4.1.4). In addition, no specific public comments were received during scoping and the two subsequent public workshops requesting expansion of the BMGR road network. Alternative Management Strategy B includes a provision to evaluate the foreseeable need to actively pursue expansion of the BMGR road network, but does not provide specific plans to do so.

Comment Summary 1.16: Investigate illegal road closures on the BMGR that occurred over the past several months.

Commenters 1.16: ARP, DJB, IE, NS, MW, NW, RD, SH

Response 1.16: Some roads in Management Unit 6, commonly known as Area B, were incorrectly posted as closed in the fall of 2002 as a result of administrative confusion and error. The visitor use map for this area that was initially issued with BMGR permits for the 2002-2003 season also was in error in that it showed these closures. These actions were taken entirely by the Air Force and did not involve the BLM, Cabeza Prieta NWR, or any other of the agencies participating in the preparation of the proposed INRMP or the associated EIS. The Air Force assumed full management responsibility for BMGR—East, including Area B, from the BLM in November 2001. The incorrect road closure postings and map errors were quickly corrected when they were brought to the attention of the Air Force range management officer. Nearly all the road closure signs were removed and a corrected map was published and issued. The only road closures currently remaining in Management Unit 6 include closure of the lead-in-lines for Manned Ranges 1 and 2 for public safety purposes and closure of several small roads segments to protect nearby resources of known sensitivity that were being impacted by continued use. All other roads remain open pending the outcome of the EIS and INRMP planning process.

Comment Summary 1.17: The maps in the draft EIS intentionally omitted roads in Area B and were designed to be hard to read.

Commenters 1.17: ARP, IE, DJB, JM, MW, NS, NW

Response 1.17: No roads were intentionally omitted from the draft EIS and the maps were prepared to provide presentations that are as clear as possible given the scale necessary to represent the BMGR and the complexity of the road system alternatives and associated public entry information that needed to be depicted. The EIS for the proposed INRMP was developed using the best available road inventory information (see Section 3.4.4). The Core Planning Team recognized that the available inventory may be incomplete, but had reason to believe that it represents the vast majority of established vehicle travel routes within the BMGR. The Core Planning Team also identified a need to develop a protocol for evaluating road management issues—including potential retention or closure of existing roads or vehicle travel ways, if any, that were not identified in the current road inventory—that arise after the implementation of the INRMP (see Section 3.4.4 and Appendix C). The GPS road trace map provided by the Arizona Reclamation Project shows two road segments in the vicinity of Tom Thumb Peak that are not in the road inventory used for the INRMP planning process or on the maps shown in the EIS. The inventory representing the existing road system was presented to the public at the January 2001 workshop at Gila Bend. Members of the public identified several roads that they found to be missing from the road inventory during the workshop and these roads were added to the planning maps. The roads in the vicinity of Tom Thumb Peak were not identified at that time.

At this point in the EIS process, roads will not be added to the inventory. The reported roads in the vicinity of Tom Thumb Peak may be evaluated for inclusion in the BMGR road network following implementation of the INRMP through the use of the road evaluation protocol outlined in Appendix C and through consideration under NEPA and other applicable laws. Opportunities will become available to adjust the BMGR road network on an ongoing basis as the Air Force and Marine Corps continue their management responsibilities. The potential need to adjust the BMGR road network will also be addressed during the periodic INRMP updates, which must occur at least every five years. All road system adjustments will be considered for their consistency with the military purposes of the BMGR and in the context of all resource management goals and objectives. The Air Force/Marine Corps will have to independently verify the validity of reported roads.

Comment Summary 1.18: To avoid environmental damage, resist pressure to open more roads to public access.

Commenter 1.18: CBD

Response 1.18: Your comment is noted.

Comment Summary 1.19: Requiring four-wheel drive vehicles is overly restrictive; advisory information should be adequate.

Commenter 1.19: JFC

Response 1.19: The alternative management strategies for the proposed INRMP all state that visitors must comply with general vehicle operating rules, but do not specify that a four-wheel-drive vehicle would be required. The general operating rules include requiring all vehicles and operators to be licensed for highway driving under Arizona laws and regulations and prohibiting the operation of vehicles in a matter that is reckless, careless, negligent, or likely to cause damage to natural or cultural resources. Rules of conduct in effect under the current permit system state that all vehicles must be licensed and street legal according to the Arizona Department of Motor Vehicles. Use of a four-wheel-drive vehicle is recommended by these rules for visitor safety and comfort, but is not required.

Comment Summary 1.20: Restricting public access and use is needed to protect resources if use cannot be otherwise controlled.

Commenter 1.20: DOW

Response 1.20: Your comment is noted.

Comment Summary 1.21: Continue to keep the BMGR closed to public off-road driving; suspending this closure should not have been considered in the draft EIS.

Commenters 1.21: CBD, DFR, DOW, LWF, SRM, YA

Response 1.21: The BMGR has long been closed to public off-road driving and on- or off-road vehicle racing. None of the alternative management strategies, including the revised proposed action, would suspend these restrictions. In response to comments received during scoping to establish some off-road driving areas within the BMGR, Alternative Management Strategy B appropriately includes a provision that would direct the managing agencies, if this alternative was implemented, to evaluate the need for and effects of allowing off-road driving activities within designated areas. Off-road vehicle racing, however, would not be considered in these designated areas.

Comment Summary 1.22: The draft plan does not provide for a comprehensive inventory of the wash system; therefore, agencies cannot claim to have the baseline data needed to determine the consequences of failing to prevent vehicle driving in washes.

Commenters 1.22: CBD, DOW, LWF, RH, SC, TA

Response 1.22: It is true that the BMGR wash system has not been inventoried for its potential use as motorized vehicle travel routes, but the geographic extent and hydrological, biological, and cultural importance of this system is well recognized. Consequently, the proposed action and preferred alternative (Alternative Management Strategy C) and Alternative Management

Strategy D would restrict all public motorized travel in all washes except where a wash is a part of the designated roads system open to the public and is dry. The revisions to the proposed action following review of the draft EIS did not alter this provision. These alternatives reflect the current management policy on the BMGR under the Goldwater Amendment. The current road inventory for the range includes only a few, well-established road segments that are located in washes. The consequences of continuing to use these segments as components of a designated range road network have been assessed in the EIS. Thus, no blanket authorization for public motorized travel in washes would be forthcoming should either the proposed action or Alternative Management Strategy D be implemented as the proposed INRMP. An INRMP based on either of these alternatives would not leave the use of washes as vehicle routes to the discretion of individual visitors but would support a future action by the managing agencies to evaluate designating individual washes as components of the range road system on a case-by-case basis in accordance with the provisions of the NEPA and other applicable laws.

Alternative Management Strategy B would allow motorized public travel only in designated washes when these washes are dry. No washes other than those that are part of the current range road inventory would initially be so designated if Alternative Management Strategy B were implemented as the basis for the proposed INRMP. Additional washes could be designated as open to public motorized travel following implementation of the INRMP under this alternative, but those washes would not have to be part of the designated range road system. However, such designations also would have to be in accordance with the provisions of the NEPA and other applicable laws.

Although the Goldwater Amendment does not authorize the use of washes as vehicle travel routes, unless the wash is a part of a designated road, Alternative Management Strategy A would adopt the proposal to allow motorized public travel in dry washes as provided in the draft Barry M. Goldwater East HMP, which was publicly circulated and reviewed in 1999. This is the only alternative that would leave the use of washes as motorized vehicle travel routes to the discretion of individual visitors.

Comment Summary 1.23: These comments generally objected to access closures, with many of them specifically referring to the closure of the "line road" in the southwestern corner of Area B (i.e., Management Unit 6).

Commenters 1.23: AD, ADBSS, ARP, BBE, BD, CC, DGR, DJB, FP, IE, JR, LD, MN, MS, MW, NS, NW, RB, SH

Response 1.23: Your comments are noted; however, as provided by the MLWA of 1999, the BMGR was established for military purposes and the entire range is subject to access closures (see Section 2.6). The closure authority invested in the Air Force and Marine Corps allows these agencies to close to the public any road, trail, or other portion of the range as necessary to support military operations, public safety, or national security. The Act also specifies that closures to public access are to be limited to the minimum areas and periods that are required to support these purposes [P.L. 101-65 §3031(b)(2)(A) and (B)]. The public safety issues that led to the closure of the referenced line road, which is officially referenced as the Manned Range 1 lead-in line, are provided under the *Surface Entry* subsection of Section 2.2.6.

Also see Response 1.25 for additional discussion of access closures.

Comment Summary 1.24: Are there any plans to maintain public use roads?

Commenter 1.24: PL

Response 1.24: To date, road maintenance on the BMGR has been conducted in support of military activities and restricted principally to areas of the range that are closed to public use, such as the tactical ranges. Some roads have been maintained in public use areas, but this has been limited to access roads needed for military operations, such as maintenance previously conducted within BMGR—West at the now inactive ISST test site. No specific plans for maintaining roads used principally for public access have been developed. Maintenance of selected road segments may be undertaken should these segments become impassible because of overuse and/or erosion. Such maintenance would be undertaken by the Air Force or Marine Corps, in part, to deter visitors from attempting to create their own alternative routes around an impassible road segment, preserve access that might otherwise be lost, or eliminate a driving safety hazard. Road maintenance would be limited to the extent practicable for restoring the drivability of the segment. Visitors should not mistake road smoothing and grading conducted periodically by the U.S. Border Patrol in BMGR—West as a Marine Corps maintenance activity. The Border Patrol undertakes these operations to facilitate its law enforcement and search and rescue responsibilities in response to UDA traffic.

Comment Summary 1.25: Control of public use could be best accomplished through visitor permits and education rather than permanent road or area closures. A specific request was to reinstate public access that was formerly available to the Crater Range and Aguila Mountains for bighorn sheep hunting through seasonal range scheduling and consolidation. Hunter access could be extended to more areas through the use of special use permits.

Commenters 1.25: ADBSS, ARP, BBE, BD, BLH, BMA, CC, DGR, DJB, IE, LD, MN, MW, NS, NW, RB, TP

Response 1.25: In accordance with the MLWA of 1999, the Air Force and Marine Corps make every effort to limit BMGR closures to the minimum areas and times necessary to support military operations, public safety, and national security. The Air Force has determined that the Aguila Mountains and Crater Range, which are located in North TAC, must continue to be closed to bighorn sheep hunting or other types of recreation use. This closure, which is in accordance with restrictions established by AFI 13-212V1, Luke Air Force Base (AFB) Sup 1 and 56 Range Management Office (RMO) Operating Instruction 1-3, Barry M. Goldwater Range Permitting Process (1 July 2002), is necessary to protect the public from aircraft munitions delivery operations and elevated quantities of unexploded ordnance within the tactical range and to prevent conflicts between public visitation and the flexibility to schedule military activities as needed to perform the ongoing training mission of BMGR—East.

Some commenters suggest that range scheduling and consolidation could be used to provide access opportunities for hunters. The scheduling of military activities is dictated by many competing factors affecting opportunities to conduct training or other operations on the BMGR. There is no available flexibility in the scheduling process to accommodate public access except to provide access when there are no other operational, safety, or security priorities. As explained in Section 2.2, current operational, safety, and security priorities preclude public access to most of BMGR—East and some areas of BMGR—West. The commenters did not explain what they meant by range consolidation. As examined in detail in Section 2.2 of the EIS, however, the various weapons ranges and other training/support facilities of the BMGR are spatially laid out to maximize the capacity and effectiveness of the range to meet demanding national defense training requirements. There is no room to consolidate any of these ranges or facilities to make additional space or time for public access.

Responses 1.23 and 5.6 further address comments received concerning public access to the BMGR and the BMGR permit system.

Comment Summary 1.26: Remove the references to "Roads Needed For Public Entry, Needed For Refuge Management, Not Needed For Refuge Management, and No Refuge Access" from future revisions of Figures 3-1 and 3-2. These references were used for planning purposes during the preparation of the EIS to define roads critical to the management of the Cabeza Prieta NWR but were not intended to suggest that the subject roads may not be appropriate for providing public motorized vehicle access to the refuge boundary.

Commenter 1.26: DOI

Response 1.26: The identified references have been removed from Figures 3-1 and 3-2.

Comment Summary 1.27: Various commenters support creating bypass roads to protect the Cabeza Prieta Wilderness, but with the stipulations that the bypass roads not be restricted from public use and/or the roads within the Cabeza Prieta Wilderness be closed to all users, including the U.S. Border Patrol, and revegetated.

Commenters 1.27: ADBSS, LWF

Response 1.27: The proposed action was modified to allow for general access on the bypass roads, should these roads be constructed. The roads would continue to be restricted to government use only if implemented under Alternative Management Strategy B. The actions pertaining to the roads within the Cabeza Prieta NWR/Wilderness would have to be addressed by the USFWS.

Comment Summary 1.28: The number/miles of roads on the BMGR have increased enormously over the last 25 years with most of the increase within the last 15 years.

Commenters 1.28: LWF, MH, SC

Response 1.28: Section 2.6.3, reporting the best available information on the road development history of the BMGR, has been added to the EIS to identify when roads were created within the range.

Comment Summary 1.29: The roads on the BMGR have been there for a long time.

Commenters 1.29: AM, BB, BH, BR, BS, DG, DR, CC, CDM, CG, JBR, JH, LO, MH, MS, MW, NS, RA, SLB

Response 1.29: See Response 1.28 and Section 2.6.3.

Comment Summary 1.30: Require all public use vehicles to be street legal and prohibit off-road vehicles.

Commenter 1.30: CBD

Response 1.30: All vehicles used by the public and all vehicle operators within the BMGR are currently required to be licensed for highway driving under Arizona law. None of the alternative management strategies would change these requirements. A vehicle that is perceived as being designed specifically for off-road use but is licensed for highway driving would not be restricted from the range. The ORV operator, however, would be subject to citation under all alternative management strategies if he drives his vehicle within the range off of roads designated as open for public use.

Comment Summary 1.31: Greater and more widespread public use of the BMGR could interfere with military training and damage the environment.

Commenters 1.31: CBD, JN, YA

Response 1.31: The EIS has appropriately and thoroughly analyzed the extent to which public access is consistent with the military mission and safety and security requirements at the BMGR. As indicated in Table 3-2, each of the alternative management strategies considered is consistent with the military mission requirements described in Section 2.2 and the safety and security restrictions described in Section 2.6.1. Each of the alternative management strategies would be protective of the military mission at the BMGR. Table 1-1 (see Lines 2 and 22) identifies locations in the final EIS where the issue of ensuring that public access is consistent with the military purpose of the BMGR. Also see Response 1.23.

Comment Summary 1.32: Evaluate moving the east boundary of the East Tactical Range to the west to allow public access to the Paradise Well area.

Commenters 1.32: ADBSS, BD, JF, YVRGC

Response 1.32: Current restrictions on public access to the Paradise Well area, which is in East TAC Range, are described in the *Surface Entry* subsection of Section 2.2.1. Proposals for allowing some public access to the Paradise Well area, despite its location within East TAC, were evaluated during the scoping and public workshop period, but this alternative was rejected from further consideration during the INRMP planning process because of unresolved operational issues associated with the safe operation of the tactical range (see Section 3.5).

The Air Force is willing to reevaluate the impact area and safety and security requirements associated with East TAC and to consider whether adjustments in the impact area boundary of this range would be compatible with its continuing military mission, but could not undertake this effort as a part of developing the INRMP. Assuming that such an adjustment would be compatible with the continuing military use of the BMGR, the Air Force also would take the other necessary evaluation steps—including but not necessarily limited to evaluating the hazards present within the Paradise Well area from unexploded ordnance, determining the extent of needed EOD clearances, and complying with the requirements of NEPA and other applicable law—prior to making a decision whether to maintain the current closure or open the area to public access.

Comment Summary 1.33: Many currently popular desert tours through BMGR—East will simply be eradicated along with a large portion of the only truly resilient commodity in the area, desert tourism.

Commenter 1.33: ARP

Response 1.33: None of the alternative management strategies would dramatically curtail either public access to or public traffic circulation within the portions of BMGR—East that are open to public entry (see Figure 3-1). Response 1.23 and the *Surface Entry* subsection of Section 2.2.6 explain that the lead-in lines to Manned Ranges 1 and 2 have been closed to public use because of safety hazards associated with the use of these lead-in lines by aircraft on final approach to deliver ordnance on targets at these weapons ranges. Alternative routing around these lead-in lines is available for public travel. The alternative routing provides access to all of the same destinations that travel on the lead-in lines offers, although the alternative routing may require longer travel distances to reach some locations. The alternative routing also provides scenic travel qualities that are comparable to those available along the lead-in lines. Many potential desert tours would remain under all of the alternative management strategies. See also Response 10.3.

Comment Summary 1.34: More restrictions or conditions on public access are better now in that access could always be increased or liberalized later.

Commenter 1.34: GB

Response 1.34: Your comment is noted.

Comment Summary 1.35: Keep public access as practical as possible while enhancing the range environs but prohibit construction of new public access roads and restore closed or unused roads.

Commenter 1.35: GB

Response 1.35: As indicated in Response 1.23 and in accordance with the MLWA of 1999, the Air Force and Marine Corps make every effort to limit BMGR closures to the minimum areas and times necessary to support military operations, public safety, and national security. With the exception of the proposed Cabeza Prieta NWR bypass roads, which are proposed under Alternative Management Strategies B and C, development of new public access roads is contemplated only under Alternative B. The proposed action and other alternative management strategies would not promote the development of new public access roads. The proposed action (Alternative C) and Alternative Management Strategy D would both promote natural revegetation of closed roads, whereas Alternative D would promote active restoration of closed roads.

Comment Summary 1.36: Delete or clarify the sentence on page 3-31, paragraph 2, of the draft EIS that begins with "Washes are currently part of …"

Commenter 1.36: AGFD

Response 1.36: The referenced sentence, “Washes are currently a part of the inventoried road system only where they are parts of designated roads.” has been deleted. Clarification regarding how driving in washes is addressed in the alternatives has been added to Section 3.4.4.

Comment Summary 1.37: Revise the last full sentence on page 3-6 of the draft EIS that begins with "Additionally, the road network transportation planning initiated under the Goldwater Amendment has been completed through this EIS and INRMP..." to read "... transportation planning as initiated under the Goldwater Amendment has largely been completed through this EIS ..." In reality, there are sections of road on the BMGR that have apparently been missed in the current inventory; some roads may have been classified erroneously as to their level of use/importance for recreation users, and the subject of use of washes traditionally used as roads is still partially unanswered. These roads (washes) need to be identified and not held in abeyance until the end of the 5-year review period.

Commenter 1.37: DOI

Response 1.37: The referenced text has been revised and amended to state… " Additionally, the road network transportation planning initiated under the Goldwater Amendment has been

completed through this EIS and INRMP planning process through completion of a road inventory for the BMGR and development of a full scope of road network management alternatives that are each paired with appropriate natural resource protection measures. The road inventory, which was reviewed by public, is substantially complete and adequately represents the existing road system on the BMGR. The inventory excluded washes that are not part of existing or designated roads, in accordance with the management prescriptions of the Goldwater Amendment, and may not have captured some seldom used, minor road segments. The inventory is wholly adequate, however, for designating an authorized road system for the BMGR through the consideration of a range of road system alternatives in this EIS." As indicated in this revised statement, driving in washes that are not part of existing or designated roads has never been legally sanctioned within the BMGR. The question of the use of washes as traditional travel routes by some members of the public has been resolved through the planning process as the potential for sanctioning this activity was included in Alternative Management Strategies A and B and prohibited in Alternative Management Strategies C and D. Procedures for potentially designating some additional washes—or newly identified upland road segments—as part of the authorized BMGR road system are provided in Appendix C and will be considered following implementation of the INRMP on a case by case basis; possibly as they arise, but certainly not less often than at the five-year review. See Section 3.4.4 of the Final EIS.

Comment Summary 1.38: Delete the statement on page 59 of the community report that states, "and potentially allowing future motorized access to currently restricted areas." This is common to all alternatives and should not be stressed under Alternative Management Strategy B.

Commenter 1.38: AGFD

Response 1.38: This phrase has been deleted from Section 5.6.18.2 of the final EIS.

Comment Summary 1.39: Alternatives A and B have positive controls on the proliferation of wildcat roads. We do not believe that the selection of either Alternative A or B would result in long-term adverse ecosystem effects.

Commenter 1.39: AGFD

Response 1.39: Alternatives A and B would both continue to prohibit off-road driving, but would not include some of the additional controls of either the proposed action or Alternatives C or D Recreation Services and Use Supervision resource elements (see Table 3-3). The statement in the EIS is not that Alternatives A and B *would*, but rather that they *could* result in long-term adverse ecosystem effects. Furthermore, the statement is qualified by the context of the paragraph, which is that the overall aggregate effects of these strategies when considered together with other, past, present, and reasonably foreseeable future actions as compared to the proposed action and the first part of the statement, "In some respects, the fact that these alternatives would not reduce the current extent of motorized access within the BMGR or implement positive controls on the proliferation of additional illicit, wildcat roads…" The more detailed analysis of the cumulative effects of the proposed action and alternatives, provided in

Section 6.4, does not find that Alternatives A or B would result in long-term adverse ecosystem effects.

Comment Summary 1.40: All roads should be surveyed for cultural resources prior to allowing recreation and prior to deciding which road should be left open and which should be closed.

Commenter 1.40: SHPO

Response 1.40: The Air Force and Marine Corps met with the Arizona SHPO several times between November of 2003 and February of 2004 to discuss the implementation of the preferred alternative. The SHPO's comments on the Draft EIS, especially those regarding the need to survey existing roads and public use areas, were included in these discussions. The Air Force and Marine Corps have concluded, and the Arizona SHPO has agreed, that implementation of the proposed INRMP, including establishing an approved road network and authorizing public access to and use of specific areas, has the potential to affect properties eligible for inclusion in the National Register of Historic Places. The Air Force, Marine Corps, and Arizona SHPO have agreed that given the extent of the affected area, its long history of public use, and the scarcity of available information about historic properties, it is appropriate for the Air Force and Marine Corps to demonstrate compliance with Section 106 by implementing a programmatic agreement. That agreement will include:

- a phased strategy for taking into account potential impacts on historic properties
- provisions for monitoring the effectiveness of this strategy and revising it as needed
- other measures required by 36 CFR Part 800, Protection of Historic Properties, in accordance with 36 CFR 800.14(b)(1)(ii).

A phased identification and evaluation strategy will be implemented under the terms of that agreement, and existing roads and areas known to be used by the recreating public will be prioritized. Should surveys identify historic properties that may be or are being affected by road use or maintenance or by camping or other activities permitted along roads, the adaptive management strategies associated with the preferred alternative would provide opportunities to change the road network, as necessary, to avoid those effects.

2. Hunting, Wildlife, and Wildlife Habitat, Including Protected Species

Comment Summary 2.1: The commenters indicated support for continued game management programs on the BMGR. Specific comments received on this topic included:

- large and small game, legitimate fowl, and varmint and predator species should be available for harvesting in accordance with AGFD standards
- hunting and hunter access needs to continue (for bighorn sheep)
- sheep hunting is the tool for managing the expanding sheep population on the BMGR
- if you close the BMGR, wildlife would get overpopulated and cause problems

Commenters 2.1: BBE, BMA, CC, DM, DMM, JF, PF, YC, YRGC

Response 2.1: All alternatives evaluated in the EIS for the INRMP would continue existing game management programs and activities, which are detailed in Section 4.6.3.3.

Comment Summary 2.2: Continue existing (AGFD) game management programs. These comments generally supported the continuation of existing game management programs; one specified favor for AGFD management over USFWS management for big game.

Commenters 2.2: ADBSS, DM

Response 2.2: All alternatives evaluated in the EIS for the INRMP continue existing game management programs, as discussed in Section 4.6.3.3. AGFD is responsible for managing wildlife, including big game species, in Arizona.

Comment Summary 2.3: BLM does a good job of managing the range as far as the livestock goes.

Commenter 2.3: LP

Response 2.3: Your comment is noted, but is beyond the scope of this EIS as there is no livestock grazing on the BMGR.

Comment Summary 2.4: More relaxed administrative restrictions on habitat improvements would allow for increased management benefits for wildlife. This is demonstrated by how administrative restrictions in the Cabeza Prieta NWR, related to the designated Wilderness portions of the refuge, have limited what can be accomplished for wildlife management. Thus, wildlife managers need to have access for habitat management and improvement purposes, particularly in light of the drought.

Commenters 2.4: PG

Response 2.4: The proposed action and all alternatives were designed to provide access and considered other agency missions as a criteria for determining which roads needed to be retained for government use.

Comment Summary 2.5: These comments expressed support for AGFD management of wildlife and wildlife waters. These commenters supported AGFD management of wildlife in general and specifically with regard to wildlife water developments. One specified big game species and favored AGFD management to USFWS management.

Commenters 2.5: BBE, DM, SH

Response 2.5: The proposed INRMP would neither expand nor diminish the primary jurisdiction over resident wildlife management within the BMGR that is held by the state of Arizona and exercised on behalf of the state by AGFD, as described in Section 1.3.

Comment Summary 2.6: These comments expressed support for Arizona Desert Bighorn Sheep Society (and, in one case, also the Arizona Antelope Foundation) contributions to wildlife water management. Some comments addressed access to the water holes for management.

Commenters 2.6: BMA, DM, JF

Response 2.6: Habitat management on the BMGR is a federal responsibility executed in cooperation with AGFD (see Table 1-1 item 17). Under the proposed action and all alternatives, wildlife water development projects on the BMGR would continue to incorporate collaboration with these and other organizations.

Comment Summary 2.7: Support maintenance of existing waters.

Commenters 2.7: ADBSS, BD, BLH, SH

Response 2.7: The proposed action and all alternatives would allow for the maintenance and repair of existing wildlife water developments (see Table 3-3).

Comment Summary 2.8: Support construction of wildlife waters. Some of these comments expressed a general support for the construction of waters for wildlife. Some specified that waters identified in prior plans should be constructed and some asserted that more waters are necessary.

Commenters 2.8: ADBSS, BD, BLH, DM, JEM, JR, WM

Response 2.8: The proposed action and all alternatives would potentially allow for the construction of wildlife waters, although Alternative D would suspend further implementation of new water developments during the first five years of the INRMP (see Table 3-3).

Comment Summary 2.9: These comments focus on the importance of wildlife waters for wildlife and bighorn sheep populations/sport hunting. Some comments noted that water is good for wildlife; others were more specific in stating that water is key to successful game populations.

Commenters 2.9: BMA, DM, WM

Response 2.9: Sections 4.6.3.3, 4.6.3.4 and 4.6.4 provide detailed discussions of the role of wildlife water developments as tools for managing desert bighorn sheep populations and other wildlife species.

Comment 2.10: Include redevelopment of existing waters as a maintenance and repair function.

Commenter 2.10: ADBSS

Response 2.10: The intent of the Core Planning Team has always been to support redevelopment of existing waters when such an action is necessary to maintain or restore a wildlife water that is not functioning adequately but otherwise would be a viable wildlife management asset. This position is in keeping with AGFD policy and practice, which defines redevelopment as a maintenance procedure that may be necessary to maintain or restore the functionality of an existing wildlife water. Alternative Management Strategy A would restrict potential wildlife water redevelopments on the BMGR to three existing wildlife waters in BMGR—West and 13 existing waters in BMGR—East (see Table 3-3). As noted in Section 5.6.11, a common (and perhaps equalizing) factor that would affect the implementation of the proposed action and all alternatives, would be the requirement for a site-specific analysis for each proposed water development, redesign, or redevelopment in accordance with the NEPA. Alternative Management Strategies B, C, and D would allow for the redevelopment of any wildlife water within the range if necessary to maintain or restore its functionality. Proposed redevelopment and other potential maintenance activities also would be subject to the provisions of the NEPA and other applicable law. See Sections 3.1 and 3.4.2 for information regarding the policies governing redevelopment of existing wildlife waters.

Comment Summary 2.11: The discussion of wildlife water developments includes discussions of herpetofauna species that do not occur on the BMGR.

Commenter 2.11: LWF

Response 2.11: The referenced discussion in Section 4.6.4 was clarified to indicate that the studies on herpetofauna were conducted in environments similar to the BMGR.

Comment Summary 2.12: The draft EIS does not provide a description of the location and timing of the wildlife water developments or how these decisions will be made. It is unclear which of six wildlife water developments would support Sonoran pronghorn and the relationship to wildlife water development plans described as underway in the Affected Environment portion of the draft EIS.

Commenter 2.12: DOW

Response 2.12: Section 5.6.11.1 has been modified to clarify that the six high priority wildlife water developments would be among those identified in the Lechuguilla-Mohawk and the Draft

Barry M. Goldwater—East HMPs and that the timing would be dependent upon the AGFD as the proponent agency. In addition, Section 5.7.11.1 has been supplemented to include that one potential water development site for the benefit of the Sonoran pronghorn was identified in the Draft Barry M. Goldwater—East HMP and to clarify that other Sonoran Pronghorn Recovery Team actions occurring outside the scope of the EIS include providing waters to benefit Sonoran pronghorn.

Comment Summary 2.13: The document fails to acknowledge the controversial and unproven nature of artificial water developments and ignores that no published study shows a predictable increase in wildlife after a water catchment is built.

Commenter 2.13: LWF

Response 2.13: The controversy surrounding wildlife water developments is addressed in detail in Section 4.6.4. The controversy is also acknowledged in Table 1-5, the range of alternatives for wildlife waters (see Table 3-3), the spectrum of projects in Section 1.5.5, and impact analysis in Section 5.6.11 (as well as 5.2.11, 5.3.11, 5.4.11, and 5.20.11). Section 5.6.11 acknowledges that long-term monitoring has not occurred for most wildlife populations on the BMGR, but references studies of bighorn sheep populations in areas with wildlife water developments and managers and scientists' opinions relative to those studies. As stated in Section 4.6.4, study of the effects of permanent water on the productivity and recruitment of desert bighorn sheep in the Cabeza Prieta and Sierra Pinta mountain ranges within Cabeza Prieta NWR is currently underway. Early, preliminary, unpublished information from this study shows waters to be beneficial to this desert bighorn sheep population, although the data available at this time is too preliminary to make statistically supported conclusions (Hervert 2002).

Comment Summary 2.14: The language in Section 3.1 should be changed from "The development of new permanent wildlife waters would be limited to up to six high-priority waters pending the outcome of a detailed review of the beneficial and adverse effects of water developments on the BMGR" to better reflect the language of the proposed action, which states that the up to six high-priority waters would be constructed concurrent with the review rather than pending the outcome of a detailed review of the beneficial and adverse effects of water developments on the BMGR. The language used in Table 3-14 is more accurate in stating "The approach to wildlife water developments would limit new developments in the first five years of the INRMP to six high-priority waters…. concurrently, literature research and studies would be conducted…."

Commenters 2.14: AGFD, DOI

Response 2.14: The referenced language in Section 3.1 has been changed to address this comment.

Comment 2.15: On Page 4-143 of the draft EIS, change the "may" to "will" in the statement "Wildlife that may use open water on the range…."

Commenter 2.15: DOI

Response 2.15: The referenced language in Section 4.6.4 has been changed to address this comment.

Comment Summary 2.16: Do not limit wildlife developments to six within the first 5 years of the INRMP. The development of waters on an as-needed basis would be better than placing an arbitrary limit of six.

Commenters 2.16: ADBSS, JEM

Response 2.16: Additional information was added to Sections 3.1 and 3.4.2 to explain that six water developments represents the practical limit of wildlife water developments that could be processed for implementation given the tasks required to site, evaluate, and construct a wildlife water.

Comment 2.17: Delete the statement on page 59 of the community report that states: "On these terms, Strategy B may be less beneficial than the proposed action." The Department believes that Alternative B may be one of the most beneficial strategies for managing wildlife.

Commenter 2.17: AGFD

Response 2.17: Comment is noted, but it does not pertain to the EIS; however, some modifications have been made to Section 5.6.18.2 to further qualify a statement similar to that made in the community report.

Comment Summary 2.18: Do not place a moratorium on wildlife water developments or suspend wildlife water developments after the first five years of the INRMP until the definitive study proves value and benefit. The preponderance of evidence shows wildlife water developments are of benefit and if the study proves otherwise, then the plan can be amended to account for the new information. The Arizona Desert Bighorn Sheep Society comments that Section 4.6.4 seems to place great confidence in additional research and evaluations for determining the value and effects of existing and future wildlife water developments. The organizations support further study, but are opposed to ceasing a known beneficial activity on the possibility that adverse impacts may be identified. Another commenter asserted that the Sikes Act mandates the conservation of natural resources (wildlife) for sustainable use and does not prescribe any emphasis on preservation; this means that a progressive wildlife water program should be administered and maintained.

Commenters 2.18: ADBSS, BBE, BD, JR, LD

Response 2.18: Strategies A and B would not affect current wildlife water management programs. The proposed action (Strategy C for this resource element), would not place a moratorium on new wildlife water developments, but would limit new water developments to six within the first five years of the INRMP (see Table 3-3). As explained in Response 2.16, additional information has been added to Sections 3.1 and 3.4.2 to indicate that six may be the practical limit to the number of waters that could be effectively processed and implemented in five years. Strategy D would suspend development of new waters for the first five years of the INRMP. As indicated in Table 3-3, the proposed action (Strategy C for this resource element), and Strategy D would not necessarily suspend new water developments after the first five years of the INRMP. A decision on this issue would be made following completion of an appropriate literature review and studies during the first five-year term of the INRMP. A panel of experts would then review the available data/findings from the literature review and studies and make recommendations regarding whether sufficient evidence exists to suspend planned water developments, remove existing developments, or add new developments.

Section 4.6.4 presents and defines areas where additional data or information is needed for wildlife management.

As detailed in Table 2-2, with regard to INRMP requirements in particular and reiterated throughout the EIS, the Air Force and Marine Corps are tasked not only with compliance with the Sikes Act, but also the MLWA of 1999.

Comment Summary 2.19: Recommend a 10-year moratorium on water developments until existing catchments can be appropriately monitored and studies prove their efficacy.

Commenter 2.19: LWF

Response 2.19: Your comment is noted and will be considered by the decision makers in preparing the Record of Decision. See Responses 2.13 and 2.18.

Comment Summary 2.20: Modifications made at Sauceda Pothole can trap animals.

Commenter 2.20: YCP

Response 2.20: A sentence regarding the potential for this to occur at Sauceda Pothole has been added to Section 4.6.4, which addresses wildlife mortalities at wildlife water developments (most of which are natural waters). Some supplemental information regarding design of artificial waters and modifications of natural waters to reduce entrapment potential also has been added to this section.

Comment Summary 2.21: Substantiate that game animals historically moved to the Gila or Sonoyta rivers in time of drought (or other unsubstantiated arguments for the need for supplemental waters) or remove these suppositions.

Commenter 2.21: LWF

Response 2.21: Supplemental information regarding historic movement of game animals has been added to Sections 4.6.1.9 and 4.7.1.3.

Comment Summary 2.22: Current and future wildlife water development should comply with AGFD standards in Wildlife Water Developments in Arizona: A Technical Review (1997).

Commenter 2.22: LWF

Response 2.22: Section 5.6.11 was supplemented to indicate that site-specific planning for wildlife water developments will be in cooperation with the AGFD and any AGFD recommendations, including those of the 1997 AGFD report, as well as recommendations and measures of success developed in the follow-on work of the Wildlife Water Development Team in their 2002 report (AGFD 2003) and the AGFD's latest Wildlife Water Development Standards (AGFD 2004).

Comment Summary 2.23: Extend the prohibition of camping within one-quarter mile of natural and developed waters to also prohibit hunting within one-quarter mile of the waters to protect wildlife that depend on these water sources for survival.

Commenters 2.23: DOW, LWF

Response 2.23: Your comment is noted; however, no modification of the proposed action has been made. All hunting on the BMGR is in accordance with AGFD rules and regulations, including hunting harvest limits and season lengths established to provide hunters and non-hunters with a reasonable chance of success in either hunting or observing game commensurate with the available supply and biological welfare of the particular species. Section 4.6.4 acknowledges that hunters harvest game species at water developments and that detailed studies about the effects of these mortalities to populations are not available.

Comment Summary 2.24: Development of natural water features may have cultural resource impacts.

Commenter 2.24: SHPO, YCP

Response 2.24: As addressed in Section 5.16.11.1, concerns for potential impacts on cultural resources as a result of water development projects would be evaluated in conjunction with site-specific planning under the NEPA and in compliance with the NHPA.

Comment Summary 2.25: Litter observed around water sites affects wildlife.

Commenter 2.25: YAN

Response 2.25: Your comment is noted and does not warrant further agency analysis because as addressed in Section 4.12.1.3, the Air Force and Marine Corps require all BMGR users to comply with the general rules of conduct, which require all garbage to be packed out. These rules are provided to the public in the permit for entry to the BMGR. UDAs are known to leave concentrations of trash around accessible water holes, but UDA activity is outside the scope of the EIS. Note that Border Patrol agents and Air Force and Marine Corps personnel collect concentrated trash at water holes or other sites left by UDA activity.

Comment Summary 2.26: Recreational shooting has adverse impacts to wildlife/habitat. Some comments expressed opposition to this activity and the use of automatic weapons, in particular.

Commenters 2.26: DOW, JN, LL, LWF, RE

Response 2.26: Section 4.12.1.2 has been supplemented to provide information on the types of recreational shooting that occur on the BMGR, including the use of fully automatic weapons. Section 5.6.9 evaluates the potential environmental effects of the proposed action for this type of recreational shooting to wildlife. See Responses 6.1 and 6.2 for further details.

Comment Summary 2.27: Some recreation use has harassed wildlife.

Commenter 2.27: BBR

Response 2.27: The potential for recreation on the BMGR to disturb wildlife under each alternative is evaluated in Section 5.6 (particularly 5.6.3, 5.6.4, 5.6.5, 5.6.6, 5.6.7, 5.6.8, 5.6.9, and 5.6.18). Harassment relative to specific regulatory term used in the implementation of the ESA and the protection of species listed as threatened or endangered (50 CFR 17.31) is addressed in Section 5.7 (particularly 5.7.3, 5.7.4, 5.7.5, 5.7.6, 5.7.7, 5.7.8, 5.7.9, and 5.7.18). Sections 5.6.18 and 5.7.18 were supplemented to address aggregate disturbance/harassment impacts.

Comment Summary 2.28: Continued closure of the BMGR to off-road driving is critical to maintaining healthy wildlife and plant communities.

Commenter 2.28: LWF

Response 2.28: Section 5.6.5.1 notes that wildlife and wildlife habitats would potentially benefit from elements of the proposed action that would continue to prohibit on- and off-road racing and

public ORV travel. As noted in Section 5.6.5.2, these benefits would also occur under Alternative Management Strategies A, C, or D. This section also evaluates potential negative impacts to wildlife that could occur under the Alternative Management Strategy B provision for evaluating the need for and effects of allowing recreational ORV driving within specific designated areas, which is viewed in context of the required further review of any such activity under the NEPA, ESA, and other applicable law.

Comment Summary 2.29: Commenters noted the importance of and their support for hunting as a wildlife-oriented recreational activity.

Commenters 2.29: BA, BBE, BBR, BMA, CC, CCM, DM, DMM, DR, JF, JG, JMI, PF, RE, TP, YC, YRGC

Response 2.29: The importance of hunting as a recreational opportunity on the BMGR is acknowledged in Sections 4.6.3.3 and 4.12.1.2. Section 4.12.1.4, Recreation Use Statistics, presents data showing that hunting is a predominant recreational use of the BMGR, particularly in BMGR—West. The proposed action and alternatives all fully support existing hunting opportunities and game management programs with one exception. Alternative Management Strategy D, which is not the proposed action, includes a provision to petition the Arizona Game and Fish Commission to close the BMGR to non-game species collection. Strategy D would otherwise fully support existing hunting opportunities.

Comment Summary 2.30: Allow deer hunting on the BMGR.

Commenter 2.30: DM

Response 2.30: Deer hunting is currently allowed on the BMGR and there are no proposals to eliminate this activity. Section 4.12.1.2 discusses deer hunting as a recreational opportunity on the BMGR. Based on the recreation use statistics presented in Section 4.12.1.4, the vast majority of BMGR hunter use is associated with deer hunting.

Comment Summary 2.31: More open space is needed for hunters, not more withdrawn for parks or refuges.

Commenter 2.31: AF

Response 2.31: Your comment is noted. None of the proposed actions or alternatives evaluated in the draft EIS for the INRMP would change the areas of the BMGR that are currently open to public access with a permit for access to the BMGR. The INRMP would not change the status of withdrawn lands or assign national park or wildlife refuge status to BMGR lands. Also see Responses 1.11, 1.25, and 11.27.

Comment Summary 2.32: Hunters clean and improve the area for wildlife.

Commenter 2.32: JMI

Response 2.32: Your comment is noted.

Comment Summary 2.33: Do not establish a special hunting permit program that requires a fee. Problems with implementing wildlife management, protection, and conservation have never been from a lack of funds, but rather lack of cooperation from the range management office.

Commenter 2.33: ADBSS

Response 2.33: As specified in Table 3-3, the proposed action and Alternative Management Strategies B, C, and D would not establish such a program, but rather would assess the need for such a special hunting permit program. Alternative Management Strategy A would not establish such a program or assess the need for such a program. A decision to implement a special hunting permit program under Alternative Management Strategies B, C, and D would be based on the assessment results. As addressed in Section 5.12.8.1, the assessment would need to address whether such a program would be feasible in terms of generating enough funds with a nominal fee to support the program based on hunter participation rates. This section was modified to acknowledge that most of the expense of developing wildlife waters has been contributed by private sources including the Arizona Desert Bighorn Sheep Society and how the proposed assessment also would address what funds could be used for projects other than wildlife water development projects.

Comment Summary 2.34: Hunting should be limited to reduce stress to wildlife populations, ensure hunted species are able to reproduce, and ensure that wildlife can migrate without interference. One comment stated, “do not cater to the hunters.”

Commenters 2.34: LB, LL

Response 2.34: As noted in Section 1.1, in accordance with the Sikes Act and consistent with the use of the BMGR to ensure the preparedness of the armed forces, the natural resources of the range must be managed to provide for "sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping, and non-consumptive uses" [16 U.S.C. 670a(a)(3)(B)]. As addressed in Section 2.5.1, game harvests within the BMGR are regulated by the Arizona Game and Fish Commission and administered by the AGFD. The discussion of harvest limits in Section 4.6.3.3 has been supplemented with additional information about how under the existing AGFD management regime, game species populations within the range have remained stable and productive relative to prevailing habitat conditions.

Comment Summary 2.35: Eliminate/prohibit non-game species collection (except for scientific purposes). The INRMP does not consider the elimination of non-game species collection, which

would hopefully reduce harassment of these species and keep the gene pool healthy, as collectors tend to collect "trophy" specimens.

Commenters 2.35: CBD, CM, JN, RE, YA

Response 2.35: Authority to close the BMGR to non-game species collection rests with the Arizona Game and Fish Commission not the Air Force or Marine Corps. Section 4.12.3.1 notes the commission and AGFD's management jurisdiction for the state's wildlife.

Alternative Management Strategy D would direct the Air Force and Marine Corps to petition the Arizona Game and Fish Commission to close the BMGR to non-game species collection (see Table 3-3). As addressed in Section 5.6.8.1, the collection of non-game species is not currently believed to be a species conservation issue on the BMGR. Thus, the proposed action (Strategy B) would not directly petition the Commission to close the range to non-game species collection but would first evaluate the effects of non-game species collection on wildlife, habitat, and other resources. If indicated by the results of the evaluation, a petition to limit or restrict collection activities would be directed to the Commission for the state's consideration and potential approval (see Table 3-3).

Comment Summary 2.36: It is a fundamental biological law that you cannot have an excess of predators unless there are prey species in excess. Is some bureaucrat unilaterally determining which animals are good for the desert and which are not?

Commenter 2.36: YAN

Response 2.36: Predator control, as considered in the EIS, regards protection of a special status species, as needed (see Table 3-3, Resource Management Element 12, Strategy C, second bullet) and assessed in Section 5.6.12.

Comment Summary 2.37: Invasive exotic plants can be introduced and spread as a result of roads providing access to remote areas. These plants can out compete native plants, alter ecological food chains, and create higher fuel levels whereby fire can become an agent of habitat conversion.

Commenter 2.37: RS

Response 2.37: The existing conditions with regard to the survey, control, and monitoring of exotic, invasive, or noxious plant species (such as Sahara mustard, red brome, and buffelgrass) on the BMGR are addressed in Section 4.5.3.4. The density and distribution of non-native species on the BMGR is not accurately known. Some reports have found that roads and vehicular travel on these roads appear to be the main vectors for dispersal of one such plant, the Sahara mustard. Roads alter drainage patterns and catch water to support Sahara mustard growth, and can provide preferred conditions for germination of this species by burying the seeds. Non-native plant species can displace native habitat through competition or fire. Sections 5.5.3, 5.6.3, and

5.7.3 acknowledge that those alternatives that reduce the road network would have the potential to prevent vehicles from introducing seeds of weedy or non-native species, particularly species that are known to prosper in disturbed soils, that may be carried on vehicle tires or frames. It is also noted that roads are more prevalent in some natural communities, particularly creosotebush-bursage desertscrub. Because of the prevalence of roads in these areas, they may be more vulnerable to change by non-native species, which may grow more densely and carry fire more easily and lead to destruction of native vegetation that is critical for wildlife.

Comment 2.38: Few of the data gaps identified for wildlife and vegetation appear again as management strategies to be pursued during the life of the plan.

Commenter 2.38: LWF

Response 2.38: Section 2.8.3 has been supplemented to explain how Chapter 4 subsections addressing "Information not Currently Available to Support Management" (including Sections 4.5.4 and 4.6.4, which address information currently available to support vegetation and wildlife management) will provide at least a partial basis for developing a resource inventory and monitoring subplan. This subplan would be created following the ROD based on the selected INRMP management strategies. See also Response 13.3.

Comment Summary 2.39: Commenters expressed support for Sonoran pronghorn management actions.

Commenters 2.39: JEM, JME, PJ

Response 2.39: Your support is noted. As noted in a paragraph added to the end of Section 3.3, the INRMP was developed to support the Sonoran Pronghorn Recovery Team, Recovery Plan, and Recovery Actions, which serve as the cornerstone for all Sonoran pronghorn recovery efforts.

Comment Summary 2.40: Development of highways/railroads has had the effect of creating a biological island that restricts Sonoran pronghorn from where they would naturally go to seek food and water.

Commenters 2.40: JEM, JFC, PJ

Response 2.40: Section 4.6.1.9 addresses wildlife movement corridors and barriers. Section 4.7.1.3 details the current status of the Sonoran pronghorn and discusses reasons for decline, including barriers to expansion within historical habitat.

Comment Summary 2.41: Note that management of federally listed endangered species is a responsibility that AGFD shares with the USFWS.

Commenter 2.41: DOI

Response 2.41: Section 2.5.1 has been revised to acknowledge this.

Comment Summary 2.42: Old wells could be reactivated to provide water, and food could be hauled in for antelope and other animals during drought.

Commenters 2.42: LP, RD

Response 2.42: Thank you for your suggestions. As described in Section 4.7.3.3 of the EIS, the Sonoran Pronghorn Recovery Team is currently implementing a forage enhancement and supplemental water project, which is one of the measures identified by the 1998 Revised Sonoran Pronghorn Recovery Plan. At a minimum of one of these locations, an existing well is being used for this purpose. Old inactive wells have not been appropriately located or have been otherwise an unsuitable option for providing irrigation waters at the sites selected for development of forage enhancement plots.

Comment Summary 2.43: Range managers should have been allowed to provide water and food for the Sonoran pronghorn during the recent drought.

Commenter 2.43: PJ

Response 2.43: Wildlife managers have provided emergency water and food sources for Sonoran pronghorn, as addressed in Sections 4.7.1.3 and 4.7.3.3.

Comment Summary 2.44: Internal fences left over from historical ranches should be removed to improve Sonoran pronghorn (and other species) mobility.

Commenter 2.44: PL

Response 2.44: Thank you for your suggestion. Efforts to identify and remove such fences to eliminate possible hindrances to Sonoran pronghorn movement are currently underway by various agencies within BMGR—East, Cabeza Prieta NWR, Organ Pipe Cactus NM, and the BLM lands near Ajo.

Comment Summary 2.45: The Defenders of Wildlife urges designation of one or more special natural/interest areas for the Sonoran pronghorn and references objectives of the proposed action that would support such designations. The organization specifically suggests a number of habitat types that deserve additional protection: bajadas, identified areas with chain fruit cholla distribution in North and South tactical ranges, and washes.

Commenter 2.45: DOW

Response 2.45: Section 3.3 has been supplemented with information to describe how the proposed INRMP alternatives are designed to support the Sonoran Pronghorn Recovery Plan and recovery actions identified by the Sonoran Pronghorn Recovery Team (see also Response 2.46). Section 5.7.2.1 was modified to reiterate this and to note that the management objective that would evaluate the potential for altering existing or establishing additional special natural/interest areas could support future designations of a special natural/interest area for the Sonoran pronghorn if deemed appropriate by the Sonoran Pronghorn Recovery Team.

Comment Summary 2.46: The draft EIS fails to (1) integrate the various components of resource management that affect the Sonoran pronghorn into a meaningful plan to address the species plight and (2) describe potential elements of such a plan, including what actions will be taken, why, when, and how.

Commenter 2.46: DOW

Response 2.46: Section 3.3 has been supplemented to clarify that the intent of the Core Planning Team was to prepare an INRMP to support the Sonoran Pronghorn Recovery Team, Recovery Plan (see Section 4.7.3.3), and Recovery Actions (see Table 4-21), which serve as the cornerstone for all Sonoran pronghorn recovery efforts. Rather than creating and analyzing an additional detailed layer of management for the Sonoran pronghorn through the proposed INRMP planning process, the Core Planning Team designed the proposed action and alternative management strategies to provide a protective and supportive framework within which the dynamic management requirements of endangered/threatened species recovery could proceed with a minimum of encumbrances over the next 22 years.

As explained in Section 2.4.3, the philosophy of the Core Planning Team's planning process and policy was intended to develop a plan at a programmatic level that reflected a shift from principally single-species management (e.g., focus on species such as the Sonoran pronghorn) to ecosystem/biodiversity management. As described in Section 4.7.3.3, the Sonoran Pronghorn Recovery Plan is the primary vehicle for addressing the survival and recovery of this endangered species. The Air Force and Marine Corps are active participants in the Sonoran Pronghorn Recovery Team and are funding or otherwise assisting with recovery actions as identified by the requirements of Biological Opinions prepared by USFWS. As further addressed in Response 2.47, the Air Force and Marine Corps are consulting with the USFWS on the proposed INRMP.

Consultations regarding the Sonoran pronghorn took place by letter, dated 14 June 2005 (see Appendix F) to address the impacts that may result from the proposed INRMP. A new Biological Opinion was issued on 26 August 2005 that concluded the proposed action is not likely to jeopardize the continued existence of the Sonoran pronghorn.

Comment Summary 2.47: Presenting the measures required by the Sonoran Pronghorn Biological Opinions and Recovery Plan as something separate from Sonoran pronghorn management under the INRMP may violate NEPA and ESA.

Commenter 2.47: DOW

Response 2.47: Refer to Response 2.46 for a discussion of how Sonoran pronghorn management was approached by the Core Planning Team in the EIS/INRMP planning process. The draft EIS incorporates the applicable provisions of the Recovery Plan and Biological Opinions for Sonoran pronghorn as well as other endangered and threatened species (Sections 4.7.2 and 4.7.3 and Table 4-21) and did not intend to bifurcate the INRMP from Sonoran pronghorn management in its presentation of various Sonoran pronghorn recovery efforts.

Table 3-3, management element 12, special status species and Section 3.3 recognize that there are some Sonoran pronghorn management actions that would occur regardless of the INRMP, but also notes the interrelationship between the INRMP and these actions. As appropriate, these actions are evaluated in Chapter 6, Cumulative Effects. Also see Responses 11.14, 2.48, and 2.49.

Comment Summary 2.48: With respect to road closures, Strategies A and B do not meet the terms of the current Biological Opinions for Sonoran pronghorn and, thus, do not qualify as "reasonable" under NEPA and would violate the Endangered Species' Act take and no jeopardy provisions.

Commenter 2.48: DOW

Response 2.48: As noted in your comment, the EIS acknowledges the potential conflict between Alternative Management Strategies A and B and 2001 Biological Opinions in the summary Comparison of Alternatives, Table 3-14. In the Section 5.7.3.2 discussion of potential environmental consequences for Strategy B, the EIS states that the Air Force and Marine Corps would not be complying with the terms of the current Biological Opinion for Sonoran pronghorn. Also, in Section 5.7.3.3, the EIS states that with Strategy A there would not be the benefits for protected species as described for the proposed action, but that such benefits could potentially be eventually realized if the transportation plan were finalized and implemented.

The Council on Environmental Quality Forty Most Asked Questions Concerning the agency's NEPA Regulations (printed in Federal Register Volume 46, Number 55, 18926-18038 on 23 March 1981) specifies that Section 1502.14 requires an EIS to "examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is 'reasonable' rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." Further, that "potential conflict with local or federal law does not necessarily render an alternative unreasonable,

although such conflicts must be considered" (Question, Alternatives Outside the Capability of Applicant or Jurisdiction of Agency).

The 2001 Biological Opinion for Marine Corps military operations at the BMGR includes a conservation measure that proposes that the Marine Corps would permanently close roads within BMGR—West through the proposed INRMP that both occur within the current range of the Sonoran pronghorn and are not needed for administrative agency use. The 2001 Biological Opinion for Air Force military operations at the BMGR includes a similar conservation measure that proposes that the Air Force would permanently close approximately 163 miles of road within BMGR—East that occur within the current range of the Sonoran pronghorn. These biological opinions were issued in November 2001, more than a year after the spectrum of road alternatives was formed for the draft EIS following scoping in August 2000 and almost 11 months after the alternative management strategies for roads were reviewed in detail with the public at the January 2001 workshop and revised accordingly.

Although Alternative Management Strategy A would not close roads within the current range of the Sonoran pronghorn, this alternative is nevertheless reasonable because it represents the no-action alternative, which must be considered in a NEPA document. Alternative Management Strategy B, which also would not close roads within the current range of the Sonoran pronghorn, is nevertheless reasonable for consideration as it reflects both the existing condition and the results of public scoping comments. Alternative Management Strategy B includes a provision that allows for potential future development of roads within the BMGR for other than government administrative purposes, but such roads would not have to be constructed within the range of the Sonoran pronghorn. The proposed Cabeza Prieta bypass roads also are not within the range of the Sonoran pronghorn.

Thus, including Strategies A and B to reflect the full range of reasonable alternatives for motorized access and unroaded area management and recognizing the conflict with the 2001 Biological Opinions is consistent with NEPA and its implementing regulations. These alternatives would not violate the 2001 Biological Opinions unless Strategies A or B were selected for this resource element and implemented without further Section 7 consultation with the USFWS. The revised proposed action and preferred alternative identified in this final EIS would close 616 miles of roads. Currently, there are 650 miles of inventoried BMGR roads within the range of the Sonoran pronghorn. The revised proposed action and preferred alternative would close 112 miles, or about 17 percent, of those 650 miles. Since the Air Force and Marine Corps are consulting with the USWFS on the INRMP preferred alternative, there is no violation of the ESA. The results of these forthcoming consultations will likely address the potential extent and terms of road closures within the current range of the Sonoran pronghorn as it occurs within the BMGR. After issuing the Air Force Biological Opinion in 2001, the USFWS agreed that it would be inappropriate to contend the appropriateness of the draft EIS alternatives. The Service also agreed that the extent of road closures needed within Sonoran pronghorn habitat within BMGR—East could be addressed as indicated for BMGR—West in the Marine Corps Biological Opinion; that is, through the INRMP/EIS process and consultations on the proposed INRMP preferred alternative.

The Marine Corps and the Air Force recently re-consulted with the USFWS, pursuant to the 6 February 2003 stipulated agreement reached with the plaintiffs in Defenders of Wildlife v. Norton, on their military operations at the BMGR. Revised biological opinions on these operations, which supersede the 2001 biological opinions, were published in August 2003. The issue of proposed road closures within the current range of the Sonoran pronghorn and the potential extent and terms of such closures is not addressed in these biological opinions, but is left to the consultations on the proposed INRMP.

Comment Summary 2.49: The draft EIS does not reference or address the consultation that the agencies are purportedly engaged in at the current time pursuant to a stipulated agreement reached with the plaintiffs in Defenders of Wildlife v. Norton; this should be incorporated into the proposed action and alternatives.

Commenter 2.49: DOW

Response 2.49: At the time the agreement referenced in your comment was signed, on 6 February 2003, draft EIS reproduction was underway; thus, this information could not be incorporated into the document. Section 4.7.3.2 has been modified to incorporate this information.

Comment Summary 2.50: Treatment of predator control in the INRMP is incredibly vague.

Commenter 2.50: DOW

Response 2.50: Section 5.7.12.1 has been supplemented to provide additional information; and explain that no specific plans for implementing predator control programs to benefit any species on the BMGR have been identified at this time.

Comment Summary 2.51: Various commenters expressed concerns about the potential impacts of the Yuma Area Service Highway (ASH) to flat-tailed horned lizard and flat-tailed horned lizard habitat. Some commenters expressed opposition to the Yuma ASH and the military's support of the project on these grounds.

Commenters 2.51: CBD, DP, JN, LL, LWF, RE, YA

Response 2.51: The EIS presents a full range of alternatives with respect to the utility/transportation corridors element and specifies how each would impact the planned Yuma ASH (see Table 3-3). The Core Planning Team selected Management Strategy C for this element principally because planning for the highway was well under way when the INRMP planning process was initiated and the existing management plan for the BMGR, the Goldwater Amendment, allowed for the development of new utility/transportation corridors. The Marine Corps also had determined by the time the INRMP process was underway that the ASH project,

as proposed, is compatible with existing and foreseeable future military operations owing to its proposed siting along the western boundary of the BMGR.

The EIS identifies the potential impacts of the proposed action for this element (which would allow the construction of the Yuma ASH as planned) to vegetation, wildlife and wildlife habitat, and protected species in Sections 5.5.10.1, 5.6.10.1, and 5.7.10.1, respectively.
Also, see Response 12.1.

Comment Summary 2.52: Top threats to wildlife come from growing recreation, off-road vehicle use, and border law enforcement and migration activity.

Commenters 2.52: CBD, TA

Response 2.52: The EIS acknowledges these impacts, which are generally outside of the auspices of the INRMP, in the existing conditions assessment (Section 4.5, 4.6, and 4.7) and in the cumulative effects analysis (Chapter 6). In response to concerns about the potential effects of growing demands for recreational use and trans-border traffic, elements were included in the proposed INRMP to (1) support resource monitoring and inventory activities and (2) promote Air Force and Marine Corps participation in monitoring perimeter land use patterns and encroachment threats and in regional land-use planning (see Table 3-3). These elements were designed to provide the information necessary to support adaptive management responses to changing environmental conditions.

Comment Summary 2.53: Limits on group sizes may unintentionally thwart future wildlife conservation activities.

Commenter 2.53: ADBSS

Response 2.53: The proposed action for the recreation services and use supervision element would not limit group sizes, but rather would require a special use permit for groups with 10 or more vehicles in all Management Units except for Unit 2 where groups with 20 or more vehicles would require a permit. Section 5.6.5.1 has been supplemented to indicate that wildlife conservation activities, supported by the INRMP and approved by the Air Force or Marine Corps, involving large numbers of vehicles would be required to obtain the necessary special use permit. However, the special use permit requirement would not be expected to impact wildlife conservation activities.

Comment Summary 2.54: Bat gates for mines need to be designed to allow for use by barn owls, fox, ring-tailed cats, and bighorn sheep.

Commenter 2.54: GG

Response: A statement that, "Any gates that are installed to impede human entry to mine shafts or tunnels would be designed, to the extent practical, to provide appropriate ingress and egress to all relevant wildlife species," has been added to Section 5.6.5.1 and 5.7.5.1.

Comment Summary 2.55: Commenters expressed support for the proposal to prevent the public from entering mines on the BMGR to protect bats.

Commenters 2.55: CBD, CM, DOW, JN, RE, YA

Response 2.55: Your support is noted. The potential benefit from this objective included in the proposed action for the recreation services and use supervision element is assessed is Section 5.6.5.1 and (for the federally endangered lesser long-nosed bat, and the state listed California leaf-nosed bat) in Section 5.7.5.1.

Comment Summary 2.56: Fences need to be maintained to control cattle.

Commenters 2.56: LP, RD

Response 2.56: The periodic trespass cattle issue and problem areas are identified in Section 4.6.1.8. The proposed action and alternatives all include objectives to develop procedures to control trespass livestock (see Table 3-3).

Comment Summary 2.57: Wild burros are damaging the environment.

Commenter 2.57: DEB

Response 2.57: Feral burros and their potential impact on the environment are addressed in Section 4.6.1.8, Exotic, Invasive, or Noxious Species.

Comment Summary 2.58: Vehicle use in washes harms wildlife and habitat – washes are used as wildlife corridors.

Commenters 2.58: CBD, DOW, LL, LWF, RE, RH, SC

Response 2.58: Sections 5.5.5, 5.6.5, and 5.7.5 address impacts of vehicle use in washes on wildlife and wildlife habitat. See also Responses 2.59 and 1.1.

Comment Summary 2.59: Vehicular travel in accessible dry washes is the most ecologically benign form of access.

Commenters 2.59: BD, JEM

Response 2.59: The potential ecological impacts of vehicle driving in washes are discussed in Sections 5.2.5, 5.3.5, 5.4.5, 5.5.5, 5.6.5, and 5.7.5 in context of the proposed action and alternatives for Recreation Services and Use Supervision (see Table 3-3). Vehicle tracks in wash beds are periodically erased by storm water flows, which may be an aesthetic advantage in contrast to roads or other vehicle tracks in upland locations, but the contention that the use of washes as vehicle travel routes is more ecologically benign than the use of roads in upland locations in the BMGR cannot be supported in general.

Comment Summary 2.60: Wildlife benefit from larger unroaded areas (including Sonoran pronghorn, bighorn sheep, mountain lion).

Commenters 2.60: CBD, DOW, JN, LWF, PC, SC, YA

Response 2.60: These benefits are acknowledged in Sections 5.6.3 and 5.7.3.

Comment Summary 2.61: Current threats to the Sonoran pronghorn include habitat degradation and fragmentation, as well as direct injury and mortality, stemming from government agency activities such as grazing and fencing, military and border operations, and road and recreational impacts. Although severe drought is currently a major concern, Sonoran pronghorn are ultimately adapted to survive in harsh desert conditions, and the real problem lies in actions that have compromised this species' normal ecological strategies for coping with drought.

Commenter 2.61: DOW

Response 2.61: Additional information about the threats to Sonoran pronghorn in context of drought as well as the latest information on recovery efforts and population stats has been added to Section 4.7.1.3.

Comment Summary 2.62: The DoD has failed to implement habitat measures under the 1997 Rangewide Flat-tailed Horned Lizard Management Strategy. There appears to be disconnects between the draft EIS and the Rangewide Strategy, particularly with regard to the HMA. What steps have been taken by the DoD for protection of the flat-tailed horned lizard and its habitat?

Commenter 2.62: DOW

Response 2.62: Section 4.7.3.2 details the Marine Corps Consultation No. 2-21-95-F-114, including those items that pertain to the flat-tailed horned lizard and implementation of the strategy. Section 4.7.3.3 has been modified to reflect the 2003 revisions to the strategy. Section 4.11.1 clarifies that the HMA from the Strategy superceded the HMA established by the Goldwater Amendment, which expired on 6 November 2001.

3. Camping and Wood Collection

Comment Summary 3.1: Allow vehicle-based camping within 100 feet of roads. This is consistent with local wilderness areas and allows campers to avoid the dust from road traffic. Permitting a 100-foot limit will lessen congestion by vehicle-based campers to partially compensate for reductions in road mileage.

Commenters 3.1: ADBSS, BD, BLH, FF, JEM, JF, JFC, JK, LB, PM, YVRGC

Response 3.1: Your comment is noted as support for this management objective in Strategy B for the Camping and Visitor Stay Limits resource element. The proposed action (Alternative Management Strategy C) would allow vehicles to be pulled off the road, but would require that vehicles be parked within 50 feet of the road (see Table 3-3). Campsites could be located farther than 50 feet from the road, but all camping gear would need to be carried on foot rather than transported by vehicle. Section 5.12.4.1 has been supplemented to address how motorized travel is not allowed within designated wilderness in the local area or elsewhere and how motorized travel is addressed in non-wilderness corridors (such as in the Cabeza Prieta NWR and Organ Pipe Cactus NM) that may support vehicle access to the interior of these areas. On the Cabeza Prieta NWR, while the non-wilderness corridor is 200 feet wide, vehicles are nevertheless required to stay within 50 feet from the center of the road (USFWS 1997e). In Organ Pipe Cactus NM, which includes areas of designated wilderness, backcountry campers are prohibited from driving or parking off the designated roads and backpackers are to park their vehicles in the pullout of the parking area specified on their backcountry permit (National Park Service 2003).

Comment Summary 3.2: Restrict vehicle camping to within 50 feet of roads. Parking off of roads should be considered based on locations where cultural resources can be avoided. A good protective measure would be to designate camping areas and develop campgrounds based on findings of archaeological surveys. Limit camping to previously disturbed and established sites.

Commenters 3.2: CBD, CM, DOW, JN, RE, SHPO, SRM, YA

Response 3.2: Your comment is noted as support for management objectives in the proposed action and Strategies C and D for the Camping and Visitor Stay Limits element (see Table 3-3) to "allow vehicle-based camping within 50 feet of most existing roads designated as open to public use; restrict camping along certain road segments for resource protection purposes" and "assess benefits and effects of establishing designated camping areas and implement a decision based on the findings." As noted in Section 5.16.4.1, cultural resource surveys and effect assessments would need to be conducted in conjunction with site-specific NEPA assessments and in compliance with the NHPA.

Comment Summary 3.3: Remove the no overnight camping restrictions within the Mohawk Mountains in Management Unit 4 and on the east side of the Sauceda Mountains in Unit 6.

Commenters 3.3: ADBSS, BD, BLH, JEM, JR

Response 3.3: While the prohibition on camping along certain roads in Management Units 4 and 6 (as indicated on Figure 2-4) is relatively new, it was implemented independent of the INRMP planning process when the Air Force determined there were public safety hazards associated with camping in the proximity of targets within the adjacent East TAC where night air-to-ground munitions delivery training occurs. Similarly, expended air-to-air munitions or target debris falling out of the Air-to-Air Firing Range is a safety hazard for camping in portions of Management Unit 4. With the exception of the short corridor labeled for day use only (to allow for a loop road west of the Mohawk Mountains), Management Unit 4 is closed to all public access except by special use permit (see Figure 2-4).

Comment Summary 3.4: Prohibit camping within one-quarter mile of natural or developed waters.

Commenter 3.4: DOW

Response 3.4: As noted in Sections 4.12.1.3 and 5.14.11, it is unlawful to camp within one-quarter mile of a water hole containing water, or a man-made watering facility containing water if camping there means that wildlife or livestock may be denied access to the only reasonably available water, according to Arizona hunting regulations. Neither the proposed action nor any of the INRMP alternatives would affect the application of this law.

Comment Summary 3.5: Ban collection of dead and downed wood. Some commenters specified that this ban should apply to Management Units 1, 4, 5, and 7, as well as special management areas such as ACECs.

Commenters 3.5: CBD, JN, PL, RE, YA

Response 3.5: Your comment is noted as support for Alternative Management Strategy D, which would prohibit wood cutting and removal of wood from the range in all locations as opposed to the alternative management strategies (see Table 3-3). The proposed action (which includes Alternative Management Strategies C in Management Units 2 through 7 and Strategy D in Management Unit 1) would prohibit wood cutting and removal of wood from the range in all locations. The proposed action also would prohibit wood gathering and native wood campfires in Management Unit 1, but would allow the use of dead and downed wood for campfires in other management units as long as monitoring indicates that the wood resources remain sustainable. As assessed in Sections 5.5.7.1, most of the area within Management Unit 1 that is open to public access is the former Tinajas Altas ACEC. The proposed action would continue the legacy of prohibiting wood collection, which was established by the BLM's Goldwater Amendment.

As shown in Figure 2-4, most of Management Units 4 and 7 and all of Unit 5 are closed to general public access because of the safety issues associated with the tactical, manned, and Air-to-Air ranges. Section 5.5.7.2 has been modified to indicate that the Air Force prohibits its personnel from collecting dead and downed wood. Therefore, use of wood in these management

units would primarily be limited to persons who obtain a special use permit to access these lands. The special use permit could prohibit wood collection for campfires if deemed necessary and appropriate.

As assessed in Section 5.5.7.1, under the proposed action wood collection for campfires would continue to be allowed in most of the areas where public access is permitted. This would include the former Mohawk Mountains and Sand Dunes ACEC but not the former Tinajas Altas Mountains ACEC. However, if it is determined that dead and downed wood is being used at a rate that is not sustainable or if sensitive resources are being damaged by wood collection and use, the proposed action allows for restricting wood collection.

Comment Summary 3.6: Allow the use of dead and downed wood for campfires.

Commenters 3.6: BD, BLH, DMM, JEM, SRM

Response 3.6: Your comment is noted as support for the proposed action and Alternative Strategies A and B for this resource element. The use of dead and downed wood for campfires is addressed in Response 3.5.

Comment Summary 3.7: Monitor wood supplies.

Commenter 3.7: SRM

Response 3.7: Your comment is noted as support for this management objective, which is included in the proposed action and Strategy C for wood cutting, gathering, and firewood use. The need for such monitoring also is implied under Alternative Management Strategy B, which would allow sustainable on-range wood cutting, gathering, and firewood use but would prohibit wood removal from the range. This management objective is not included in Alternative Management Strategy D because no use of native wood would be allowed on the BMGR under this alternative.

Comment Summary 3.8: Support a 7-day stay, 28-day wait limit on camping stays.

Commenter 3.8: SRM

Response 3.8: Your support for this management objective, which is consistent with Strategy D to limit vehicle-based camping stays to 7 consecutive days within a 28-day period except by special use permit, is noted and will be considered by the decision makers. The existing requirement; proposed action; and Alternative Management Strategies A, B, and C would all limit vehicle-based camping stays to 14 consecutive days within a 28-day period except by special use permit (see Table 3-3). Section 5.12.4.1 has been supplemented to indicate that no significant management issues have been identified with the existing 14-day consecutive stay limitation.

Comment Summary 3.9: Prescribe rules for waste disposal.

Commenter 3.9: SRM

Response 3.9: Your comment is noted as opposition to Alternative Management Strategy A, the no-action alternative, which does not specifically address rules for waste disposal. As indicated in Table 3-3 (in the Camping and Visitor Stay Limits resource element), the proposed action and Alternative Management Strategies B, C, and D would define and prescribe reasonable rules for the disposal of human sewage and solid waste in accordance with applicable federal, state, and local regulations.

Comment Summary 3.10: Do not establish new restrictions on camping.

Commenter 3.10: GWB

Response 3.10: Your comment is noted as support for Strategy A for the Camping and Visitor Stay Limits resource element and will be considered by the decision makers. As indicated in Table 3-3, Strategy A for this resource element would retain the existing restrictions on camping. Strategy B would allow vehicle-based camping within 100 feet of existing roads designated as open to public use (rather than 50 feet). Strategy C (the proposed action and preferred alternative for this resource element) would continue existing restrictions and also restrict camping along certain road segments for resource protection purposes. Strategy D would be the same as Strategy C, but would limit vehicle-based camping stays to 7 consecutive days within a 28-day period except by special use permit rather than 14 days.

Comment Summary 3.11: Do no allow woodcutting.

Commenter 3.11: SRM

Response 3.11: Your comment is noted as opposition to Alternative Management Strategy B for the Wood Cutting, Gathering, and Firewood Use, and Collection of Native Plants resource element, which would allow for wood cutting (see Table 3-3). The proposed action for this element (Strategy D in Unit 1 and Strategy C in all other Management Units) would not allow wood cutting. The no-action alternative (Strategy A) prohibits wood cutting for commercial or domestic use. Also see Response 3.5.

4. Rockhounding

Comment Summary 4.1: Rockhounding should not be prohibited.

Commenters 4.1: ARP, DMM

Response 4.1: Your comment is noted as support for this recreational activity. As noted in Section 3.4.2, the proposed action would continue to allow rockhounding in Management Units 2 and 3, which account for most of the area within BMGR—West that is open to public access and recreation. This would continue to be limited to surface removal (i.e., no subsurface excavation) for personal (i.e., non-commercial) purposes and limited to no more than 25 pounds. Rockhounding would be prohibited in other publicly accessible areas, including Management Unit 6 (also known as Area B) and the former Tinajas Altas ACEC in Management Unit 1, primarily to help protect cultural resources. As noted in Section 5.16.6.1 of the EIS, authorized rockhounding is unlikely to have any measurable impacts on cultural resources, but sometimes rockhounding can lead to unauthorized collection of artifacts or the collection of obsidian and geode sources that are part of archaeological sites. In addition, rockhounding would be restricted from special natural/interest and other designated areas that are sensitive to impacts arising from human-induced disturbances.

Comment Summary 4.2: Prohibit rockhounding.

Commenter 4.2: SHPO, SRM

Response 4.2: Your comment is noted as opposition to this recreational activity and support for Strategy D for this management element. See Response 4.1.

Comment Summary 4.3: Define the frequency of how often rockhounds could collect up to 25 pounds of rocks. How will that limit be checked and enforced?

Commenter 4.3: PL

Response 4.3: Section 5.12.6.1 has been supplemented to clarify the collection amounts and approach to enforcement.

5. Public Safety, Military Mission, and Miscellaneous Recreation (not covered by Rockhounding, Hunting, Camping, Wood Collecting, etc.)

Comment Summary 5.1: Prohibit public entry to mines.

Commenters 5.1: CBD, CM, DOW, JN, RE, YA

Response 5.1: Your comment is noted as support for the proposed action, Alternative Management Strategies C and D, which would prohibit recreational entry to mines range-wide because of extreme safety hazards and to protect roosting bats from disturbance (see Table 3-3, Recreation Services and Use Supervision resource element). Section 5.12.5.1 has been supplemented to further characterize the relatively small, but unquantifiable amount of recreation entry to mines that is known to occur on the BMGR. As indicated in Table 3-3, Strategy A would

continue the existing management and, thus, recreational use of mines would be expected to continue at rates similar to existing conditions. Existing management of public entry to mine shafts that are otherwise not closed or barricaded would also, at least initially, be unrestricted under Strategy B. This strategy would initiate a feasibility study to determine if public entry to mines could be compatible with safety and resource protection requirements at specific mine sites. If such entry were found to be compatible, a program would be implemented to support such use under special use permit provisions. If such entry were found to be incompatible with safety and resource protection requirements, then entry to all mines would be prohibited. See also Response 2.55, which more specifically addresses bat habitat in mines.

Comment Summary 5.2: Add Buckeye Hills Recreation Area to Section 4.12.1.5, Outdoor Recreation in the BMGR Vicinity, and Figure 4-20, Recreation and Protected Management Areas in the BMGR Region.

Commenter 5.2: MCPR

Response 5.2: Figure 4-20 has been modified to include the Buckeye Hills Recreation Area.

Comment Summary 5.3: Recreational use of the range may only occur if it is sustainable in relation to the environment and if it is consistent with the military mission.

Commenters 5.3: BBE, BBR, CM, JN, PC, PJ, RE, YC

Response 5.3: Your support is noted and will be considered by the decision makers. As described in Section 1.1, the INRMP is to be prepared in accordance with the MLWA of 1999, which requires the proper management and protection of the natural and cultural resources of the range and for sustainable use by the public of such resources to the extent consistent with the military purposes of the range. Table 1-1, lines 1 and 2 show where this MLWA requirement is addressed throughout the EIS. In accordance with similar provisions of the Sikes Act, the INRMP also must provide for sustainable use by the public to the extent that the use is not inconsistent with the needs of fish and wildlife resources, subject to requirements necessary to ensure safety and military security. Table 1-1, lines 16, 21, and 22 show where this Sikes Act requirement is addressed throughout the EIS.

Comment Summary 5.4: Identify incidents when public activities and trespass have forced military missions to be canceled.

Commenter 5.4: YA

Response 5.4: Section 4.13.2 has been supplemented to include available data on public activities and/or trespass incidents causing the diversion, delay, or cancellation of a military mission. Also see Response 6.1.

Comment Summary 5.5: These comments expressed general support for the military and/or support for military use/management of the BMGR. One commenter suggested that the military has the opportunity to use the plan to guide, educate, control, prevent, and mitigate public use and another expressed concern that the military is relinquishing some control.

Commenters 5.5: AF, BBR, BD, DR, JC, JF, JM, JPM, LB, LL, MH, PF, PJ, RE, SB, YRGC

Response 5.5: Thank you for your support for the military and the Air Force and Marine Corps management of the BMGR. The proposed INRMP is expected to build on the record of effective management of public use that has been achieved over the last several years under the partnership between the Air Force, Marine Corps, BLM, AGFD, and USFWS and to regulate such use where necessary to ensure that it is sustainable. The proposed INRMP would not cause the Air Force or Marine Corps to relinquish their responsibilities for regulating public access and use of the BMGR so that it is consistent with the military purposes of the range and is ecologically sustainable. Rather, the proposed INRMP should reinforce their abilities to manage public use toward these ends, as reiterated throughout the EIS and detailed in Section 1.3. Also see Response 1.23.

Comment Summary 5.6: These commenters generally supported the continued requirement for a permit. Some other related comments were as follows:

- Visitor permits should continue to include an education component
- A fee should not be assessed
- Special permits to visit areas that are ordinarily off-limits should be governed by an open process, without favoritism

Commenters 5.6: ADBSS, DF, JEM, JPM, LWF

Response 5.6: Your support for the continuation of the BMGR permit system is noted. The permit is addressed in the Recreation Services and Use Supervision element of the INRMP alternatives (see Table 3-3). The existing permit system, which includes natural and cultural resource and safety educational information, is described in Sections 2.6.1 and 4.12.1.3. The potential impacts of the proposed action and alternatives related to this issue are addressed in Section 5.12.5. Response 2.33 provides further clarification about the potential special hunting permit program and fee.

Section 4.12.1.2 has been supplemented to include additional information about the special use permit process for bighorn sheep hunter access to some BMGR areas (not including the tactical and manned ranges) that are ordinarily off-limits. See also Response 1.25, which provides additional details on special use access limitations.

Comment Summary 5.7: Address geocaching, vehicle racing, large groups, survivalist activities, and militia training in the EIS (opposed to all of these).

Commenters 5.7: LWF, YAN

Response 5.7: Your opposition to these activities is noted. Those recognized as management issues (vehicle racing and large groups) are included in the Recreation Services and Use Supervision element in the alternative management strategies (see Table 3-3). Those not specifically mentioned therein (geocahing, survivalist activities, and militia training) would be managed under the adaptive management provision included in the Recreation Services and Use Supervision and Resource Inventory and Monitoring elements for Alternative Management Strategies C and D. Section 4.12.1.2 describes the current recreational environment of the BMGR and includes known data and details on recreational use of the range. Section 5.12.5 has been supplemented to further assess the potential impacts of the proposed action and alternatives with regard to these activities.

Comment Summary 5.8: Prohibit metal detectors.

Commenter 5.8: SRM

Response 5.8: Your comment is noted as support for the proposed action and Strategies C and D for Recreation Services and Use Supervision resource element, which would implement a new management objective to prohibit the use of metal detectors (see Table 3-3). The potential impact of the proposed action and alternatives for this management objective is assessed in Section 5.12.5.

Comment Summary 5.9: Few of the identified data gaps for recreation (e.g., data on recreation use, hunting activity levels) appear as management strategies for recreation.

Commenter 5.9: LWF

Response 5.9: See Response 2.38, regarding how information not currently available for recreation management, as identified in Section 4.12.4, would be addressed in an inventory and monitoring subplan.

6. Recreational Shooting

Comment Summary 6.1: Recreational shooting should not be allowed on the BMGR. Target shooting can do no good for wildlife; cultural resources; or the safety of range workers, law enforcement agents, illegal entrants, or military personnel. Not even the military trains on the BMGR with small arms.

Commenters 6.1: CBD, DOW, JN, LB, LL, LWF, RE, SHPO, SRM, YA

Response 6.1: Your comment is noted as support for Strategy D, which would prohibit recreational shooting. Section 4.12.1.2 has been supplemented to describe existing recreational shooting policies. Recreational shooting is a valid activity on the BMGR, but this activity must be conducted in a manner that is compatible with military operations, public safety, and resource management concerns. As noted in Section 5.12.9.1, the Air Force has found that recreational shooting involving the use of automatic weapons is incompatible with the aviation training mission in BMGR—East. The Marine Corps has had similar mission compatibility concerns, but is willing to consider sanctioning use of automatic weapons under a special use permit. A special use permit would not be issued until a safety assessment and environmental impact assessment were conducted and the findings were considered.

While there are no known incidents in which recreational shooting affected the public or Border Patrol activities, Section 4.13.2 notes that a recreational shooting activity involving fully automatic weapons interrupted a nighttime military aircraft training exercise in the late 1990s (see Response 6.2). As a result, the proposed action prohibits automatic weapons and shooting at night unless a special use permit has been issued.

As described in Section 5.12.9.1, the proposed action would allow recreational shooting with sporting firearms in accordance with existing regulations, but would prohibit shooting at night except with a special use permit. Recreational shooting with automatic weapons would be prohibited except with a special use permit and a safety and environmental impact assessment would be needed before special use permits are issued. The appropriateness of recreational shooting would be assessed to determine if this policy should be changed.

Potential impacts of recreational shooting to wildlife and cultural resources are discussed in Sections 5.6.9 and 5.16.9, respectively. Potential impacts to public health and safety (which would include law enforcement agents, UDAs, and military personnel) are discussed in Section 5.13.9.

The comment that not even the military trains on the range with small arms is erroneous. The Air Force has an approximately three-acre small arms range west of SR 85 (see Section 2.2.6 and Figure 2-1 in Volume 1). Entry to the small arms range is restricted. The Marine Corps has a rifle range located just inside of the western range boundary on the north side of the road to AUX-2 (see Section 2.2.9 and Figure 2-2 in Volume 1). The rifle range was developed in the early 1960s and remains in use at its original location. Military small arms training involving live-fire also has occurred in the past at other BMGR locations. Infantry weapons also are currently used in training involving Marine Corps troops at ground support areas and at TACTS Range target locations. This training does not currently involve live-fire exercises.

Comment Summary 6.2: After 18 years of access to the BMGR for legal sport shooting, our group has been harassed and banned from use for shooting. We take care of our use areas, leaving them in better condition than we found them. Our club shoots military weapons, including legal fully automatic weapons. Participants have had background checks and all weapons are legally registered and have never been used for a crime. We would like support from MCAS Yuma as we have shown support for the renewal of the BMGR land withdrawal. It

appears as if the proposed action would still allow for recreational shooting with fully automatic weapons with a special use permit, but there is concern that there will be so much red tape involved that this will effectively put an end to the use of legal, fully automatic weapons on the range.

Commenters 6.2: JC, MB

Response 6.2: There is some management concern with regard to potential environmental damage and litter from recreational shooting in general on the BMGR (see Sections 5.2.9, 5.3.9, 5.5.9, 5.6.9, 5.7.9, and 5.16.9), but the primary issues with the use of fully automatic weapons are compatibility with military operations and public safety, as addressed in Response 6.1. BMGR managers do not intend to harass recreational shooting groups using fully automatic weapons; rather, they have taken what they have deemed as necessary action to ensure that all recreational activities are compatible with the military mission and public safety. The EIS principally addresses the impacts of the proposed action and alternatives for recreational shooting at Sections 5.12.9 (in terms of outdoor recreation) and 5.13.9 (in terms of public health and safety).

Through development of the proposed action and alternatives for recreational shooting, the Core Planning Team responded to the need to have a distinct policy for management of recreational shooting. As outlined in Table 3-3, all alternative management strategies for Recreational Shooting except for Strategy D would allow recreational shooting to continue on the BMGR. Strategy A, the no-action alternative, would allow recreational shooting to occur under existing regulations as long as it is compatible with military use and there is no public safety issue. Alternative Strategy B would allow recreational shooting to occur under existing regulations as long as it is compatible with military use, public safety, and no significant resource issues are identified. Strategy C (the proposed action for this resource element) would be the same as Strategy B, but also would (1) assess the importance and character of recreational shooting as an activity/issue to determine the appropriateness of this activity on the BMGR and implement a decision based on the findings; (2) prohibit automatic weapons, except with special use permit; (3) consider designating specific shooting area(s); and (4) prohibit recreational shooting between sunset and sunrise, except with special use permit. Strategy D would prohibit recreational shooting activities (not to include hunting), and assess the appropriateness of allowing this activity in designated areas.

As discussed in Section 5.12.9.1, the Marine Corps is willing to consider sanctioning automatic weapons use/shoots under special use permits. However, careful assessment of the potential safety and environmental impacts would be required before the Marine Corps could make a decision approving or denying a special use permit application for this activity.

Comment Summary 6.3: Identify incidents where recreational shooting has affected military missions, Border Patrol activities, or the public.

Commenter 6.3: YA

Response 6.3: See Response 6.1 and Section 4.13.2, which describes one incident when nighttime recreational shooting with automatic weapons interfered with a military training exercise.

Comment Summary 6.4: If recreational shooting is allowed, designate areas for this activity as well as a maintenance and clean-up plan. Examine and discuss the potential impacts of recreational shooting on archaeological sites, especially rock art.

Commenter 6.4: PL

Response 6.4: Section 5.16.9 discusses the potential effects of recreational shooting on cultural resources. With the proposed action, the importance and appropriateness of recreational shooting would be studied and decisions about recreational shooting would be based on the findings. The decisions might include limiting recreational shooting to designated areas and the selection of a designated area would include consideration the potential effects on cultural resource. Section 5.13.9.1 notes that maintenance and cleanup provisions would be addressed if a designated shooting area were established.

Comment Summary 6.5: Consider placing limits on the size of weapon that can be used and the elevation at which the weapon could be fired.

Commenter 6.5: LB

Response 6.5: As noted on Table 3-3, with the proposed action for recreational shooting, the types of military firearms that may be used for recreational shooting on the range (including automatic firearms) would be subject to the terms of a special use permit. Section 4.12.1.2 includes some of the existing safety regulations, which include firing at an elevation that is above the horizon of the shooter.

Comment Summary 6.6: The special use permit to shoot fully automatic weapons could be a bunch of red tape that effectively eliminates the opportunity to use fully automatic weapons.

Commenters 6.6: JC, MB

Response 6.6: As noted in Response 6.1, the use of fully automatic weapons has interfered with a military operation and could compromise public safety and environmental resources such as rock art or individual plants, particularly if environmental features are used as targets. Consequently, a safety and environmental impact assessment would be needed before a special use permit could be issued. The outcome of any such study cannot be pre-determined. Government funding constraints could potentially delay the completion of the safety and environmental impact assessment, although this potential delay could be avoided if recreational shooting clubs or other organizations were willing to pay for the assessment.

7. Undocumented Aliens/Drug Smugglers

Comment Summary 7.1: UDA and drug smuggler traffic is the source of most of the off-road driving and other types of non-military use impacts; do not close existing roads to public access until the UDA/smuggler problem is solved.

Commenters 7.1: AF, AK, BA, BHE, BM, CBD, CC, DEB, DF, DGR, DR, EC, EF, EP, ES, GK, JFK, JK, JPM, JV, LS, MH, MM, PF, PH, PJ, PM, SB, TP

Response 7.1: Section 2.7.1 has been supplemented to indicate that the Air Force and Marine Corps, have no authority to regulate border law-enforcement activities and the proposed INRMP is not a forum through which these activities may be managed. Section 6.3.2.2 has been supplemented to acknowledge impacts of UDA and smuggler traffic as one of the preeminent sources of damage to the range environment.

Although illegal cross-border traffic is among the preeminent law enforcement and management issues within the BMGR, other activities, including legitimate public use, that may have relatively less affect on the range environment, cannot be dismissed as unimportant management issues. The MLWA of 1999 and Sikes Act provide that public access to and multipurpose use of the BMGR must be managed so as to remain consistent with current and future military operations and associated safety and security requirements, consistent with the needs of wildlife, and ecologically sustainable. Drug smuggler and UDA traffic involving off-road driving is currently causing damage to the range that has not yet been brought under control. Nevertheless, public motorized vehicle access must be addressed in the proposed INRMP. Most range visitors use their vehicles responsibly and do not engage in off-road driving. However, as described in Response 1.28, visitors have created relatively dense local road networks at popular attraction areas, such as Tinajas Altas and the Fortuna Mine area, principally over the last 15 years. These types of vehicle impacts must be controlled if public use of the BMGR is to be sustainable. Additional information about the BMGR road development history has been added as Section 2.6.3.

Comment Summary 7.2: Deal with the trash, often in the form of food containers and plastic water jugs, left behind by UDAs and smugglers.

Commenters 7.2: MM, YAN

Response 7.2: Section 4.18.3.1 (which has been improved in response to this comment) addresses ongoing Air Force, Marine Corps, and Border Patrol programs to address trash or other refuse (including vehicles). These actions occur and will continue to occur independent of the INRMP.

Comment Summary 7.3: A prohibition against off-road driving/vehicle use in washes should apply in equal force to Border Patrol activities.

Commenters 7.3: CBD, LP, LWF, RD

Response 7.3: Section 2.7.1 has been modified to include a reference to how the Air Force and Marine Corps do not have the authority to regulate Border Patrol's law-enforcement requirements or activities, including driving in washes.

Comment Summary 7.4: Damage from illegal use of the range is not discussed in the draft EIS.

Commenters 7.4: CBD, DOW, JN, SC, TA

Response 7.4: Section 6.3.2.2 has been supplemented to better address resource damage as a result of illegal activity. Specifically, that activity resulting from unauthorized, non-military off-road driving and the resulting illicit proliferation of wildcat roads, which has been identified as the most serious illegal activity on the range since the development of the Luke Air Force Range Natural Resources Management Plan (U.S. Air Force 1986). The scale of the UDA problem on the BMGR and the scope and nature of relevant Border Patrol law enforcement and search and rescue activities are described in Section 2.5.2. Future information needs relative to surface disturbance from non-military uses, including Border Patrol operations and UDA activities are identified for earth resource management in Section 4.2.4, vegetation management in Section 4.5.4, general wildlife and wildlife habitat resource management in Section 4.6.4, and management of hazardous materials and wastes in Section 4.18.4. UDA traffic is identified as a factor affecting recreation visitors in the introduction to Section 4.12, as a factor potentially affecting public health and safety in Section 4.13.1.5, and as a range law enforcement issue in Sections 4.14.1 (in the introduction) and 4.14.3. The extent to which the Border Patrol collects UDA associated litter is described in Section 4.18.3.1.

Smuggler and UDA traffic and associated Border Patrol enforcement activities are addressed in Chapter 5, Environmental Consequences, under a number of resource categories including the following:

- soil resources (Sections 5.2.1.1 and 5.2.11.1)
- water resources (Sections 5.3.3, 5.3.3.1, and 5.3.3.2)
- vegetation (Section 5.5.11.1)
- wildlife and wildlife habitats (Sections 5.6.3, 5.6.3.1, 5.6.3.2, and 5.6.11.1)
- special management areas (Section 5.11.14.2)
- outdoor recreation (Sections 5.12.3.1, 5.12.3.2, and 5.12.18.1)
- public health and safety (Sections 5.13.3.1 and 5.13.11)
- law enforcement (Sections 5.14.1, 5.14.2.1, 5.14.3.1, 5.14.13, 5.14.18.1, 5.14.18.2)
- perimeter and transboundary land use (Section 5.15.3.1)
- noise (Sections 5.20.3.1 and 5.20.3.2).

8. 0 Law Enforcement

Comment Summary 8.1: While Strategy D was not selected for all management units, the *de facto* strategy would be for retaining a minimum of six law enforcement positions. A similar comment was to support the retention of at least six law enforcement officers.

Commenters 8.1: DOI, SRM

Response 8.1: Your comment is correct. A minimum of six law enforcement officers would be retained with Strategy D and these officers would have responsibilities throughout the BMGR. Therefore, even though Strategy C is the proposed action for Management Unit 2, the minimum number of law enforcement officers would be six because this is the proposed action for the majority of the management units.

Comment Summary 8.2: Increasing enforcement of existing laws and regulations is the only alternative for lessening or eliminating sources of environmental damage.

Commenters 8.2: CBD, MH

Response 8.2: As discussed in Section 5.2.5.1 and other sections regarding recreation services and use supervision, law enforcement is a critical management tool for lessening or eliminating environmental impacts from unlawful activity. Section 4.14 describes the existing law enforcement environment, including actions taken by the Air Force and Marine Corps to ensure that law enforcement is available for the range on a full-time basis. These agencies are currently taking budget planning steps to increase the number of their available commissioned law-enforcement officers. With the proposed action, the goal would be to retain a minimum of six law enforcement officers to patrol the BMGR. The Air Force currently employs five security personnel and the Marine Corps currently employs two commissioned law enforcement personnel; the Air Force and Marine Corps are seeking funding to increase the number of security/law enforcement personnel. The ability of these agencies to retain a minimum of six officers will be dependent on continued law enforcement funding.

These agencies also believe that it is important to recognize that compliance with rules of conduct for protecting the range environment can be enhanced through public contacts, education, and information; signs and gates; and support from individual members of the public and various groups with an interest in the range. In addition, regulations, such as those limiting the number of vehicles in a single party or imposing long-term camping stay limits (unless exceptions are authorized under special use permit) are also effective tools for ensuring that public use of range resources is sustainable as required by the MLWA of 1999 and the Sikes Act. The Air Force and Marine Corps recognize, however, that effective enforcement of the rules of conduct that result from the selected management strategies will be key in implementing the INRMP.

Comment Summary 8.3: Describe the role that the military will have in enforcing range policies. What can and will range staff enforce? What laws govern enforcement efforts? Will the military live up to its responsibility to enforce laws and policies?

Commenter 8.3: LWF

Response 8.3: Section 4.14.1 identifies the principal agencies with current jurisdiction for enforcing natural and cultural resources laws within the BMGR and briefly describes the roles of these agencies.

With the proposed action, the DoD objective is to fund and staff a minimum of six full-time law enforcement officers. As indicated in Response 8.2, and Section 4.14.1.2, the Air Force and Marine Corps collectively employ two commissioned law enforcement officers and five security personnel at the BMGR. The proposed minimum of six full-time officers is a greater number of enforcement personnel than has historically patrolled the range and demonstrates a commitment to enforce the laws as well as the management policies of the INRMP.

Comment Summary 8.4: Law enforcement officers should have Archaeological Resources Protection Act (ARPA) training so they have the authority to arrest pothunters and vandals.

Commenter 8.4: SHPO

Response 8.4: As discussed in Section 4.14.1.1, the Marine Corps law enforcement officers have been to an ARPA investigation and enforcement class and the Air Force civilian employee who oversees the security function at BMGR—East has attended ARPA training.

9. 0 Special Management Designations

Comment Summary 9.1: The draft EIS does not identify prescribed management objectives for special natural/interest areas. The proposed action for special natural/interest areas allows for development of special management provisions as needed for resource protection, as opposed to identifying what those management provisions will be. One of the management provisions should include an adaptive provision for the continued development and refinement of management strategies to best protect resources based on inventorying and monitoring.

Commenters 9.1: DOW, LWF, YA

Response 9.1: The prescribed management objectives are included in Table 3-3 in the Special Natural/Interest Areas resource element. The potential impact of the programmatic management objective to allow for development of special management provisions as needed for resource protection is assessed in Sections 5.2.2, 5.3.2, 5.5.2, 5.6.2, 5.7.2, 5.9.2, 5.11.2, 5.12.3, 5.16.2, and 5.17.2 (some of which have been supplemented in response to this comment), wherein opportunities to identify site-specific policies that go beyond those defined by the proposed action and alternatives are identified. The Resource Inventory and Monitoring resource element

applies to the special natural/interest areas as well as other areas of the BMGR (see Table 3-3). As assessed in Section 5.11.1, there likely would be increased inventory and monitoring in designated special natural/interest areas.

Comment Summary 9.2: Redesignate the Flat-tailed Horned Lizard HMA and the ACECs that were established by the BLM.

Commenters 9.2: CBD, CM, JN, YA

Response 9.2: Your comment is noted as support for the proposed action, and Alternative Management Strategies A, C, and D for the Special Natural/Interest Areas resource element (see Table 3-3). Section 5.11 assesses the potential impacts of the other 16 resource management elements of the proposed action and alternatives to these special management areas.

Comment Summary 9.3: Protect and redesignate the SRMAs; these areas need more specific management prescriptions than the plan proposes. The Sentinel Plain Lava Flow SRMA should be subject to the same management guidelines as those applied to the former ACECs, including limiting vehicle use to designated roads.

Commenters 9.3: CM, JN, LWF, YA

Response 9.3: Your comment is noted as support for Alternative Management Strategies A and D for the Special Natural/Interest Areas element (see Table 3-3). The impacts of these Alternative Management Strategies for the Special Natural/Interest Area resource element are assessed in Section 5.11.2.3 and 5.11.2.2, respectively. The proposed action for this element (Strategy C) and Alternative Management Strategy B would not redesignate the SRMAs as special natural/interest areas, but the provisions associated with Management Units 5 and 6 would direct the management of the former SRMAs (see Table 3-3 and Figure 2-4). As assessed in Sections 5.11.2.1 (which has been improved), it is believed that the management provisions provided by the 16 other proposed resource management elements would provide adequate protection for these areas under the proposed action.

10. Socioeconomics

Comment Summary 10.1: A ROD must not be made solely on the incomplete and biased analysis contained in the INRMP. In addition to environmental and cultural conservation strategies, an honest and objective decision must take into account the economic impacts specific to each surrounding community. An economic impact statement is integral to the ROD process; therefore, an economic impact statement must be mandated and reviewed prior to the final ROD.

Commenters 10.1: ARP, DJB, IE, MW, NS, NW

Response 10.1: As stated in Section 1.1.1, the ROD will be made based on the final EIS for the INRMP. Section 4.19.3.2 has been supplemented to include applicable guidance of socio-economic analysis in NEPA's implementing regulations and references to sustainable use in the MLWA of 1999 and Sikes Act. The EIS complies with this guidance, first in the description of the affected environment, at Section 4.19 and second in the evaluation of potential environmental consequences, at Section 5.19.

The NEPA implementing regulations provide that the ROD "(a) State what the decision was. (b) Identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable. An agency may discuss preferences among alternatives based on relevant factors including economic and technical considerations and agency statutory missions" (40 CFR 1505.2). Socioeconomic impacts, including economic impacts to communities near the BMGR, are addressed for all alternatives in Section 5.19 by each of the 17 individual resource management elements (Sections 5.19.1 through 5.19.17) and in aggregate (Section 5.19.18). Economic effects associated with changes to public access are discussed in Section 5.19.3.

Comment Summary 10.2: These commenters declared the importance of tourism to the economy of Ajo, with some referencing:

- winter visitors
- how economic hardships of the past (principally related to the closure of the mine) has made tourism increasingly important
- the desert environment and access thereto as tourist attraction

Commenters 10.2: AM, ARP, BB, BH, BR, BS, CDM, CG, DG, FP, JBR, JH, LF, LO, LP, MW, NS, NW, RA, SLB

Response 10.2: Section 4.19.1.3 (Economic Profiles) addresses the closure of the Phelps Dodge mine and Ajo's subsequent economic base strongly based in tourism.

Comment Summary 10.3: The proposed action and, in particular, proposed road closures would have adverse economic impacts. Some comments specifically noted:

- that impacts would be greatest in the communities of Ajo, Why, and Lukeville
- how road closures could hinder currently popular desert tours through BMGR—East
- that road closures are thinly veiled under the guise of "endangered species" or "cultural resource preservation"
- that already impoverished communities do not have the resources to counteract the legalese and interests of environmental groups advocating road closures/less access
- how tax dollars should be used to keep the land open to Americans for generations to come rather than wasted by fixing something that is not broken

Commenters 10.3: AD, AM, ARP, BB, BH, BR, BS, CDM, CG, DC, DG, DJB, FP, IE, JBR, JD, JH, LF, LO, LP, MN, MW, NS, NW, PF, RA, SLB, SLO

Response 10.3: The potential socioeconomic impacts of the proposed action and alternatives are evaluated in Section 5.19. Section 5.19.18.1 analyzes the aggregate socioeconomic impacts of the proposed action, and specifically addresses the potential for the proposed action to result in indirect adverse socioeconomic effects if a decrease in range visitation and recreation use occurred in response to the implementation of the proposed action. Sections 5.12.3, 5.19.3, 6.3.2.2 and 6.4 have been supplemented to improve the assessment of the impact route closures of the proposed action and alternatives in context of the other closures in the Ajo area.

The commenters concerned about not having the resources to counteract the legalese and interests of environmental groups advocating road closures/less access should note that NEPA implementing regulations 40 CFR 1503.4 requires that "[a]n agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively" and "[a]ll substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement." In accordance with this guidance, all comments received on the draft EIS were given equal consideration in preparing the responses to comments and the final EIS.

The commenters who were concerned that closing roads was an inappropriate expenditure of tax dollars should note that the Air Force and Marine Corps (1) are required to meet Sikes Act and MLWA of 1999 requirements to prepare an INRMP and (2) operate on budgets that are subject to DoD funding priorities and Congressional budget allocations, as detailed in Section 1.5.5. As noted in Section 3.4.4, a range of alternatives for motorized access and unroaded area management was developed to reflect the conflicting public attitudes and values with regard to roads and unroaded areas on the BMGR. As assessed in Section 5.19.18.1, in aggregate, the proposed action (Strategy C, as modified) complements those public attitudes and values that favor a balance of public access and use opportunities as well as resource protection and conservation.

Comment Summary 10.4: These comments consist of various testimonials about the value of the desert environment to the local lifestyle.

Commenters 10.4: AD, BAF, BBR, CCM, DC, EP, HVZ, JD, LF, LL, MH, MN, SLO

Response 10.4: Similar public viewpoints expressed during scoping and the subsequent workshops regarding the values of the BMGR environment to the human community are summarized in Section 1.8. The importance of the BMGR having an area for outdoor recreation is detailed in Section 4.12 and the potential effects of the proposed action and alternative management strategies are described in Section 5.12. Communities and other socioeconomic factors that may be affected by the proposed INRMP are described in Section 4.19. The potential consequences of the proposed action and alternatives on these communities and other socioeconomic factors are described in Section 5.19. Cumulative impacts to the human community are assessed in Sections 6.3 and 6.4. Some of these sections have been modified to better address local lifestyle issues.

11. Management Plan, EIS, and Preferred Alternative

Comment Summary 11.1: The draft EIS lacks concrete plans with specific goals, objectives/standards, budgets, and schedules for managing the natural and cultural resources of the BMGR. These omissions violate the NEPA by impermissibly delaying public disclosure of actual plan standards and timelines until the final plan/final EIS stage.

Commenters 11.1: BBR, CBD, DOW, LL, LWF, RE, RH, SC, TA, YA

Response 11.1: The proposed INRMP is generally being developed to provide long-term strategic, rather than detailed, guidance for managing natural and cultural resources and sustainable public use at the BMGR over the next 19 years. The proposed plan also is designed to resolve certain specific ongoing management issues—such as regulating the road network—where action is supported by available information, resource data, and cooperating agency consensus on the need and general course for action. The level of specificity that will be provided in the forthcoming INRMP will adequately meet the provisions of the MLWA of 1999 and the Sikes Act. Five overarching management policy goals and 24 resource-specific goals for the proposed INRMP are provided in Section 3.2.2. Both the overarching policy and resource-specific management goals were developed through interagency cooperation and in consideration of two cycles of public workshop review and comment prior to preparation of the draft EIS.

As explained in detail in Section 3.2, the Core Planning Team developed four preliminary alternative management strategies for the proposed INRMP based on both the overarching policy and resource-specific management goals; comments received during scoping; and the requirements of the MLWA of 1999, Sikes Act, and other applicable law. These preliminary alternatives were reviewed in detailed at the two public workshops. The alternatives were revised in consideration of comments received at the first workshop and further reviewed at the second. No one at or following the second workshop suggested that the alternatives were either inadequate or inappropriate. The general consensus from the workshop was that each participant found that the alternatives for the proposed INRMP represented a reasonable range of management alternatives.

The majority of the participants asked the Core Planning Team to identify a preferred alternative in the draft EIS from within the spectrum of alternatives presented at the workshop. Consistent with this viewpoint and incorporating other input received during the workshop, the Core Planning Team identified a fifth alternative management strategy, as a composite of elements from each of the initial four alternative strategies, that constitutes the proposed action and preferred alternative presented in the draft EIS. The draft EIS was subsequently prepared in accordance with the overarching policy and resource-specific management goals and the five alternative management strategies, which fully define the scope and specificity of the proposed INRMP. The proposed action and preferred alternative were subsequently revised in consideration of comments received on the draft EIS and carried forward in the final EIS (see Sections 3.2.3 and 3.4.4).

INRMPs typically include a list of specific management projects and associated schedule and budget requirements that are needed to implement the INRMP. These implementation parameters are prepared for a five-year budget planning horizon and are updated annually over the lifetime of the INRMP and for subsequent INRMP updates that must occur at least every five years. The process and specific management activities that will be pursued to implement the proposed INRMP regardless of the alternative management strategy selected from this EIS is described in Sections 1.1.1 and 1.5.5. Lists of specific management activities, schedules, and budgets that would be associated with each of the INRMP alternatives are not provided in this EIS as the list for each alternative would generally vary only in terms of the scale of details to be addressed and would not provide a meaningful basis for differentiating among the environmental consequences of the alternative management strategies. Such a list of action items to implement the alternative selected in the ROD will be incorporated in the stand-alone INRMP document.

The Land and Water Fund of the Rockies (now known as Western Resource Advocates) submitted written comments in November 2000 following the first workshop that included a detailed outline for a conservation management plan for the BMGR. (This outline has been resubmitted with this organization's comments on the draft EIS and is included in their comment letter as an attachment.) The Core Planning Team revised the alternative management strategies in consideration of input received at the first workshop and the written comments submitted by the Land and Water Fund. Some elements from the Land and Water Fund comments, such as conservation of unroaded areas, were incorporated in the revised alternative management strategies but the Core Planning Team could not adopt the specific management standards recommended by this organization in total. These standards would define a specific and generally inflexible course of management that would generally be compatible with Alternative Management Strategy D but would be incompatible with the other alternatives developed for consideration in the draft EIS. Some of the standards, such as prohibiting all ORV travel including that undertaken by DoD agencies in support of their military missions, were inconsistent with the purposes of the BMGR established by the MLWA of 1999. Thus, the overall approach recommended by the Land and Water Fund was rejected as being incompatible with both the military mission of the BMGR and the study of a reasonable range of alternatives. (See also Section 3.5, which describes alternatives considered but not carried forward for detailed evaluation.)

Comment Summary 11.2: The draft EIS presents a plan to write a plan.

Commenters 11.2: CBD, LWF

Response 11.2: Based on the reasonable range of alternatives considered for the proposed INRMP, the proposed INRMP would prescribe a blend of long-term strategic and specific management guidance that would meet the provisions of the MLWA of 1999 and the Sikes Act. Some elements of the alternative management strategies would prescribe the subsequent development of a subplan needed to address certain detailed management activities that the Core Planning Team believed would be more effectively defined after decisions on other management elements of the proposed INRMP have been made. For example, specific resource inventory and monitoring requirements could best be defined once decisions on elements such as motorized

and unroaded area management or firewood collection are completed. After those decisions, an inventory and monitoring subplan would be developed that would provide the detailed actions necessary to measure and track the effectiveness of necessary road closures and unroaded area management or the effects of permitted firewood collection.

Development of management activity or implementation plans in accordance with guidance provided through the adoption of a long-term resource management plan is a proper and well-established, effective land management approach. This approach does not deny the public access to information that is relevant to the decisions that are proposed for action in the draft EIS. Where applicable, the descriptions and analyses of alternatives, such as those for the range road network, that incorporate detailed management measures are provided in corresponding detail. In contrast, alternatives that propose general management strategies, such as those for wildlife waters, are described and analyzed in the level of detail commensurate with the general nature of the proposed strategies. Follow-on management planning that is prescribed by the alternative management strategy selected for the proposed INRMP will be conducted in accordance with all applicable requirements, including public involvement, under NEPA, ESA, and other laws. This tiering approach to fully establishing a resource management program for the BMGR is consistent with the MLWA of 1999, Sikes Act, and NEPA.

Comment Summary 11.3: This comment was presented in the form of Pima County Resolution No. 20 03-77, which states "… that the Board of Supervisors of Pima County supports the Goldwater Range management alternative that best protects natural and cultural resources, that best provides for the safety of public visitors, and that best ensures the military mission, as set forth in Alternative “D” in the plan." The Board also requests "… that the [Congress] provide the fullest funding and support for Goldwater Range management, staffing, monitoring, enforcement, and reclamation, consistent with the needs for military training."

Commenter 11.3: PC

Response 11.3: The Board's comments on the draft EIS and interest in the proposed BMGR INRMP are noted, and will be considered by the decision makers. After consideration of all of the comments on the draft EIS and a review of statutory and policy guidelines applicable to the INRMP, the proposed action and the final EIS preferred action have been revised, but continue to incorporate a mix of Alternative Management Strategies A, B, C, and D for the 17 resource management elements that would constitute the proposed INRMP (see Section 3.4).

Comment Summary 11.4: This comment was presented in the form of Yuma County Resolution No. 03-23, that supports "… the concept of Alternative A or B for the management of public access, recreation activities, hunting and wildlife management, in that either of these alternatives would continue the multi-use ecosystem management that has proven successful."

Commenter 11.4: YC

Response 11.4: The Board's comments on the draft EIS and interest in the proposed BMGR INRMP are noted, and will be considered by the decision makers. After consideration of all of the comments on the draft EIS and a review of statutory and policy guidelines applicable to the INRMP, the proposed action and the final EIS preferred action have been revised, but continue to incorporate a mix of Alternative Management Strategies A, B, C, and D for the 17 resource management elements that would constitute the proposed INRMP (see Section 3.4).

Comment Summary 11.5: Make the final document more concise and easier to read. The final document, including the Executive Summary, should only contain the selected alternative, be concise, and have the approval of the Arizona Game and Fish Commission.

Commenters: 11.5: JF, YVRGC

Response 11.5: The complexity and length of the EIS was an unavoidable consequence of the numbers of alternatives, management elements, and potential resource impacts that were addressed in order to prepare a comprehensive INRMP. The EIS addresses the potential environmental consequences of five alternative management strategies for the proposed INRMP. Each alternative includes 17 management elements. Each of the 17 management elements of each alternative was individually evaluated relative to 20 resource assessment categories in order to determine the potential effects of each element on each resource. The potential overall effects of each alternative on each resource were then evaluated by assessing the impacts of the 17 management elements of each alternative in aggregate. Finally, the potential cumulative effects of implementing each alternative had to be determined by assessing the aggregate effect of each alternative together with past, present, and reasonably foreseeable future actions. The final EIS and the Executive Summary of the final EIS must consequently be similar to the scope and complexity of the draft EIS.

AGFD has been a cooperating agency in the preparation of the EIS for the proposed INRMP. The Arizona Game and Fish Commission is invited to review the final EIS.

The stand-alone INRMP, which will be extracted from the final EIS, will be a concise document that focuses solely on the alternative management strategy selected in the ROD (see Section 1.1.1). The relative roles and responsibilities of the Core Planning Team agencies, including AGFD, for the EIS and proposed INRMP are described in Sections 1.1.2 and 1.4.3 and Table 1-2.

Comment Summary 11.6: The draft INRMP, as reflected in the draft EIS, does not integrate activities and management measures, particularly in regard to Sonoran pronghorn, as required by the Sikes Act.

Commenter 11.6: DOW

Response 11.6: The proposed INRMP must address a far-reaching scope of resource management concerns over a planning/implementation horizon that exceeds 20 years. The

strategy crafted for preparing this plan called for a comparative environmental review of five alternative strategies for establishing a long-term resource management framework for the BMGR. The five alternative management strategies are based on five overarching policy goals and 24 resource-specific goals that were developed specifically to address BMGR management needs and were adopted through public review and comment during the scoping and workshop phases of the NEPA planning process. Both sets of goals were developed in accordance with the provisions of the MLWA of 1999, Sikes Act, and other applicable law. The 24 resource-specific goals are consistent with the five overarching policy goals and cover the full spectrum of management concerns and requirements that had been identified for the range. Each alternative management strategy includes 17 elements that are consistent with the guidance established by the overarching policy and resource-specific goals. This level of integration ensures that the resource management framework ultimately selected for the proposed INRMP will be consistent with and responsive to the requirements of the MLWA of 1999, Sikes Act, and other applicable laws. Table 1-1 identifies where each INRMP component required by the MLWA of 1999 and Sikes Act are addressed in the EIS.

The level of detail provided in the EIS describing or assessing specific management measures varies, but, as explained in Response 11.2, these differences reflect the current information and state of knowledge available to address each measure. The variation in management detail provided by the various elements of the INRMP alternatives is consistent with the MLWA of 1999 or Sikes Act and does not represent a lack of plan integration. See Response 2.46 regarding plan integration for the management of Sonoran pronghorn.

Consultations regarding the Sonoran pronghorn took place by letter, dated 14 June 2005 (see Appendix F) to address the impacts that may result from the proposed INRMP. A new Biological Opinion was issued on 26 August 2005 that concluded the proposed action is not likely to jeopardize the continued existence of the Sonoran pronghorn.

Comment Summary 11.7: The draft EIS fails to recognize that the Sikes Act provides that wildlife concerns must take precedence over public use. Under the MLWA of 1999, public use is allowed only to the extent that it does not impair the sustainability of resources and the military purposes of the range.

Commenters 11.7: BBR, CBD, CM, DOW, JN, JF, RE, RS, YA

Response 11.7: The Core Planning Team finds that the emphasis in the EIS placed on public access is appropriate relative to the guidance provided by the Sikes Act, DoD policy for implementing this Act, the MLWA of 1999, and the environmental conditions of the BMGR. The Sikes Act does not state that wildlife concerns must take precedence over public use, but rather that "[c]onsistent with the use of military installations to ensure the preparedness of the Armed Forces, each integrated natural resource management plan prepared… shall, to the extent appropriate and applicable, provide for—sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources" [16 U.S.C. § 670a(b)(1)(F)]. The Sikes Act does not define the concept of sustainable public use, but DoD Instruction 4715.3 provides guidance on this issue. This Instruction states, in part, that "The

principal purposes of DoD lands and waters is to support mission-related activities. Those lands and waters shall be made available to the public for educational or recreational use of natural and cultural resources when such access is compatible with military mission activities, ecosystem sustainability, and with other considerations such as security, safety, and fiscal soundness. Opportunities for such access shall be equitably and impartially allocated. INRMPs and integrated cultural resource management plans shall describe areas appropriate for public access" (DoD Instruction 4715.3 Paragraph 4.1.4). The Instruction defines ecosystem management, in part, as "... a process that considers the environment as a complex system functioning as a whole, not as a collection of parts, and recognizes that people and their social and economic needs are part of whole" (DoD Instruction 4715.3 Paragraph E3.1.9). The goal of ecosystem management provided by the instruction is "... [t]o ensure that military lands support present and future training and testing requirements while preserving, improving, and enhancing ecosystem integrity. Over the long term, that approach shall maintain and improve the sustainability and biological diversity of terrestrial and aquatic (including marine) ecosystems while supporting sustainable economies, human use, and the environment required for realistic military training operations" (DoD Instruction 4715.3 Paragraph E6.1).

Thus, the language of the Sikes Act, DoD policy for implementing this Act, and the MLWA of 1999 makes clear that public use of natural and cultural sources of a military installation is to be supported to the extent that it is consistent with ecosystem sustainability and compatible with the military purposes of the installation. In accordance with the MLWA of 1999, appropriate public use of the BMGR is recognized as including educational and recreational activities. The INRMP alternative management strategies assessed in the draft EIS were developed, in part, in response to a dichotomy of public comments that, from one point of view, requested that the proposed INRMP preserve existing public access and activities on the range and, from another, asked that public use/access be controlled, if not reduced, to promote natural resource protection and restoration as well as cultural resource preservation. The resulting range of reasonable alternatives provided a tool to assess the relative potential balances between public access/use and resource protection, conservation, and rehabilitation that would be achieved if various levels of road access and use controls were in place. The Core Planning Team believes that the preferred alternative identified in this final EIS represents an appropriate balance between providing public access and establishing the tools to control, monitor, and manage public recreational and educational activities so that these uses remain within parameters that support the sustainability of the range ecosystem. Also see Responses 1.18 and 1.20.

Comment Summary 11.8: The draft EIS should clearly state that all actions undertaken by the military, other agencies, and the public on the BMGR must comply with applicable natural resources law.

Commenter 11.8: DOW

Response 11.8: The issue of compliance with applicable natural resources law is addressed in numerous locations in the EIS. Table 1-1 provides an index to locations in the EIS where this issue is addressed. Section 3.3 details the need to enforce compliance with applicable

environmental laws regardless of the alternative management strategy selected and implemented through the proposed INRMP.

Comment Summary 11.9: Alternative D is the most reasonable, prudent, and sustainable option for the proposed INRMP management framework.

Commenters 11.9: CBD, DOW, JN, LL, LWF, RE, RH, RS, SC, TA, YA

Response 11.9: Your comment is noted and will be considered by the decision makers.

Comment Summary 11.10: Alternatives A or B are the most appropriate options for the proposed INRMP management framework. Some of these comments do not specifically mention an alternative management strategy, but simply state "I support all public use of the BMGR," "there should be no changes at the BMGR," or similar statements. Some commenters state that the tenets of Alternative Management Strategy A (no action) should remain in effect until economic impact studies are completed and considered.

Commenters 11.10: ADBSS, ARP, BRH, CC, DEB, DJB, DMM, EDF, EP, FP, IE, JEM, JF, JFK, JPM, JR, LF, MB, MW, NS, NW, TH, YVRGC

Response 11.10: Your comment is noted and will be considered by the decision makers. Management will continue in accordance with existing management plans, as described by Alternative Management Strategy A (no action) pending the outcome of the EIS and INRMP planning processes.

Comment Summary 11.11: Alternative C is the most appropriate option for the proposed INRMP management framework.

Commenter 11.11: JFC

Response 11.11: Your comment is noted and will be considered by the decision makers.

Comment Summary 11.12: The proposed action is the most appropriate option for the proposed INRMP management framework.

Commenter 11.12: PL

Response 11.12: Your comment is noted and will be considered by the decision makers.

Comment Summary 11.13: There should be a public input period on the INRMP action and monitoring plans, budgets, and implementation schedules before they are adopted. Section 1.5.4 includes a discussion of the INRMP review and update process.

Commenters 11.13: DOW, YA

Response 11.13: Your comment is noted. The proposed INRMP will be implemented in full compliance with the Sikes Act.

Comment Summary 11.14: Urgent action is needed to address the plight of the Sonoran pronghorn, but such action must be taken only after opportunity for and consideration of public input.

Commenter 11.14: DOW

Response 11.14: Urgent action is needed to promote the survival and recovery of the Sonoran pronghorn. However, the proposed INRMP and the EIS for the proposed INRMP are not appropriate vehicles for providing opportunities for timely public input on proposed pronghorn recovery actions that must be implemented within critically short time frames. In recent years, management of the Sonoran pronghorn has required a series of rapidly evolving and adaptive actions by the Sonoran Pronghorn Recovery Team in order to develop responsive strategies to enhance the chances that this species will continue to survive and recover. The INRMP therefore supports the Sonoran Pronghorn Recovery Team, Recovery Plan (see Section 4.7.3.3), and Recovery Actions (see Table 4-21), which serve as the cornerstone for all Sonoran pronghorn recovery efforts. Also see Response 2.46.

Consultations regarding the Sonoran pronghorn took place by letter, dated 14 June 2005 (see Appendix F) to address the impacts that may result from the proposed INRMP. A new Biological Opinion was issued on 26 August 2005 that concluded the proposed action is not likely to jeopardize the continued existence of the Sonoran pronghorn.

Comment Summary 11.15: Management Strategy C is the proposed action.

Commenter 11.15: EPA

Response 11.15: Each of the alternative management strategies includes 17 resource management elements (see Table 3-3). As described in Section 3.4.2, the proposed action is a composite resource management strategy that encompasses elements from each of Alternative Management Strategies A, B, C, and D (see Section 3.4.2 and especially Table 3-5). The motorized access and unroaded area management element of the proposed action, which is also the preferred alternative, has been revised, as described in Sections 3.2.3, 3.4.4, and 3.4.4.2, in consideration of comments received on the draft EIS and a Core Planning Team of government requirements for official access to the BMGR.

Comment Summary 11.16: The draft EIS cumulative effects analysis is insufficient.

Commenters 11.16: DOW, SC

Response 11.16: The EIS addresses the cumulative effects of the proposed action and alternatives on individual resources together with the effects of the 68 past, present, and reasonably foreseeable future actions. Nearly all of the anticipated effects of the proposed action and alternatives are either beneficial or are such that negative and positive effects would likely be offsetting. The additive or interactive effects of past actions are considered in detail over two key time frames: (1) actions that occurred before 1937, which encompasses the period prior to the establishment of Organ Pipe Cactus NM, Cabeza Prieta NWR, or the BMGR; and (2) actions since these three major land use designations were established in 1937, 1939, and 1941, respectively. Additive and interactive effects were considered at four different geographic scales relative to the BMGR: (1) effects that would occur at scales smaller than individual BMGR management units, (2) effects that would occur at the management unit scale, (3) effects that would be expressed range wide, and (4) effects that would occur at a regional scale larger than the BMGR.

The fact that the cumulative effects analysis in the draft EIS does not include detailed future management actions that will not be identified until selected management subplans are prepared after the proposed INRMP is implemented does not invalidate the analysis. Development of the subplans, which will include plans for resource and wildfire management and may include additional plans for special natural/interest areas or wildlife waters, is reasonably foreseeable. The detailed management actions that may occur as a result of these plans, however, are unforeseeable at this time. The reasonably foreseeable outcome of these plans, which is that they generally would be beneficial, is incorporated in the cumulative analysis through the analysis of the effects of the proposed action and alternatives (see Chapter 6).

Comment Summary 11.17: In regard to the cumulative effects analysis presented in the draft EIS for the proposed INRMP, the Defenders of Wildlife incorporate their comments on the draft Yuma Training Range Complex (YTRC) Supplemental EIS by reference. The draft YTRC Supplemental EIS pertains to cumulative impacts on the Sonoran pronghorn.

Commenter 11.17: DOW

Response 11.17: The Defenders of Wildlife comments on the draft YTRC Supplemental EIS and responses to those comments are provided in the final YTRC Supplemental EIS. The final YTRC Supplemental EIS, which is available for review at the MCAS Yuma Range Management Department office, is incorporated in the EIS for the proposed INRMP by reference. Because the Defenders of Wildlife comments on the draft YTRC Supplemental and the responses to those comments have been incorporated by reference, neither the comments nor the responses need to be repeated here.

Comment Summary 11.18: Specific plans are needed to monitor, enforce, and control public use to insure that it is sustainable.

Commenters 11.18: RE, RS, YA

Response 11.18: Management, monitoring, and control of sustainable public use are major focuses of the proposed action and preferred alternative, which include elements of Alternative Management Strategies C and D. Each of these alternatives would implement a number of controls on public activities such as vehicle-based camping, firewood cutting and use, recreational shooting, rockhounding, camping stay limits, and entry into abandoned mines. Although not yet developed, the monitoring programs proposed under these alternatives would include specific monitoring of public use activities and impacts. The Air Force and Marine Corps have recently taken actions to increase the presence of law enforcement surveillance within the BMGR for the purposes of providing necessary security for government property and activities, averting trespass interference with ongoing military operations, ensuring public safety, and enforcing environmental protection laws. All alternatives would support the law-enforcement actions taken to date. The Air Force and Marine Corps have requested additional future funding to further augment their law-enforcement capabilities on the range. These requests also would be supported by the final EIS preferred alternative, draft EIS proposed action, and the draft EIS alternatives.

Comment Summary 11.19: The Community Report is blatantly biased and focuses on a subjective interpretation of the Military Lands Withdrawal Act of 1999 rather than the mandates of the Sikes Act.

Commenters 11.19: ARP, RA

Response 11.19: The provisions of both the MLWA of 1999 and the Sikes Act are legally applicable to the development of the proposed INRMP and the management of natural and cultural resources and sustainable public use on the BMGR. These Acts have been appropriately cited and addressed in the draft EIS and Community Report on the draft EIS. These documents fully reflect the mandates of the Sikes Act and implementing regulations for this Act for supporting public use consistent with the military purposes of the BMGR and the needs of wildlife and ecosystem sustainability. Also see Response 11.7.

Comment Summary 11.20: Do not make changes in management or public use; the BMGR is not broken and its resources are generally undamaged.

Commenters 11.20: AM, ARP, BB, BH, BR, BS, CDM, CG, DC, DG, DR, JBR, JD, JH, LO, MW, NS, NW, RA, RB, SLB, SLO, TP

Response 11.20: The statements in the Community Report that recognize that (1) the ecosystem of the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM have not been deeply or extensively altered but that (2) the effects of human activity within the broader regional

ecosystem must be recognized if effective measures are to support sustainable public use within the range are neither incorrect nor inconsistent. As described on pages 31 and 32 of the Community Report and in Section 6.3 in the EIS (see Tables 6-2 and 6-3 in particular), the range ecosystem has been somewhat affected internally and externally by past and present actions—such as livestock grazing; mining; road, railroad, fence line, and irrigation canal construction; military operations; recreation; and the spread of invasive or noxious animal or plant species—but most of the overall components and functions of this ecosystem presently do remain intact and are worthy of our interest. The Air Force, Marine Corps, and their partner agencies are legally mandated by the MLWA of 1999, Sikes Act, and other applicable laws to protect, conserve, and, where needed, rehabilitate the natural and cultural resources of the BMGR.

The proposed INRMP must identify appropriate goals, methods, and measures to ensure that these mandates are met, that the range ecosystem is sustainable, and that sustainable public use is supported in a manner that is consistent with the military purposes of the BMGR and safety and security requirements. The Core Planning Team found that (1) some losses of range resources and damage to its ecosystem have occurred; (2) resource damage and ecosystem stress continue to occur as a result of the cumulative effects of past and present actions; (3) some current activities, such as UDA and smuggler traffic, are continuing and growing threats to range resources; and (4) future activities and growth within the BMGR region are likely to pose increasing threats to resources and ecosystem stress. The proposed INRMP is consequently designed to address past and ongoing issues and to provide for the protection, conservation, and rehabilitation of resources; ecosystem sustainability; and sustainable public use while recognizing future threats to and demands for BMGR resources.

Comment Summary 11.21: Provide for an ombudsman, public range review board, and periodic tours of closed range areas so the public can observe and recommend improvements to range management actions.

Commenter 11.21: LWF

Response 11.21: The BMGR intergovernmental executive committee (IEC), which meets three times per year, provides an ongoing forum for public observation of and participation in discussions pertaining to the management of resources within the BMGR. In accordance with the MLWA of 1999, the IEC was established to provide a forum for the purpose of exchanging views, information, and advice relating to the management of the natural and cultural resources within the BMGR [P.L. 106-65 §3031(b)(6)]. Although the IEC was not established as an ombudsman organization or public range review board, it nevertheless is a forum in which public observations, inquiries, and complaints about management of the range can be openly expressed. The IEC also functions to provide the public with open and frank briefings regarding emerging management issues at the BMGR as well as recent, ongoing, and planned range use/management activities performed by BEC members or other agencies. The Barry M. Goldwater Range Executive Council (BEC) and member agencies of the IEC previously demonstrated, through the functions of the BMGR Partners that was the forerunner to the IEC, that they are responsive to finding forthright answers to public inquiries and complaints about range management. These agencies also have been responsive to management recommendations from the public received

through the former BMGR Partners or the IEC. In view of the functions and success of the IEC, a designated BMGR ombudsman and public range review board are not necessary at this time.

Public tours have been conducted on an as-needed basis in open areas of the range to address natural and cultural resources management concerns. Tours of closed areas of the range also have been conducted to support cultural resources management. Tours of closed areas may be scheduled in the future to support both natural and cultural resources management.

Comment Summary 11.22: The INRMP must include a Five-Year Defense plan budget if the public is to have any faith in the military's commitment to good stewardship of the BMGR. It is imperative that any revised or final NEPA documentation address this issue.

Commenter 11.22: LWF

Response 11.22: As indicated in Response 11.1, a five-year budget for implementing the proposed INRMP will be identified following the selection in the ROD of the overall management framework that will constitute the INRMP from among the alternative management strategies addressed in the EIS.

Comment Summary 11.23: Management of the BMGR should be consistent and coordinated with that of the Cabeza Prieta NWR and Sonoran NM and other adjacent or nearby land areas.

Commenters 11.23: JN, LWF

Response 11.23: The ecological significance and relationship of the BMGR, Cabeza Prieta NWR, Sonoran Desert NM, and other adjacent or nearby land areas are well documented in the EIS (see Section 1.2.4). One of the five overarching policy goals established for the proposed INRMP is the application of ecosystem management principles, which would make consideration of the ecological relationship of the BMGR to contiguous land areas one of the major resource management tenets for the range. The “perimeter land use, encroachment, and regional planning” resource management element (see Table 3-3, Element 17) incorporated in the proposed action and alternatives would promote regional ecosystem management planning as well as communication and coordination with agencies responsible for lands adjacent to the BMGR including the Cabeza Prieta NWR and Sonoran Desert NM. Representatives from the USFWS and BLM, which have management responsibility for the Cabeza Prieta NWR and Sonoran Desert NM respectively, are members of Core Planning Team for the proposed BMGR INRMP. The USFWS and BLM are also members of the BEC, IEC, and Sonoran Pronghorn Recovery Team as are the Air Force, Marine Corps, National Park Service (Organ Pipe Cactus NM), and AGFD. The Tohono O'odham Nation is an IEC member. The BEC and Sonoran Pronghorn Recovery agencies have a long track record of successful cooperation and have worked to promote consistent ecosystem-based management across the boundaries that separate the BMGR, Cabeza Prieta NWR, Organ Pipe Cactus NM, Sonoran Desert NM, and other contiguous BLM lands. The proposed INRMP would support these relationships and management principles.

However, differences in the purposes of these federal land areas and the implications of these purposes for management also must be recognized. The national defense purposes of the BMGR are identified in the EIS. Natural and cultural resources management on the BMGR, including support for public access, must first and foremost be consistent with the military mission of the range. In contrast, the foremost purposes of the Cabeza Prieta NWR, Sonoran Desert NM, and Organ Pipe Cactus NM are more similar in that they share primary commitments to protection and conservation of natural resources. Most of the Cabeza Prieta NWR and Organ Pipe Cactus NM are also designated as wilderness. Although ecosystem management principles will be emphasized within the BMGR, resource protection and conservation actions will not have the management primacy that is mandated at the Cabeza Prieta NWR, Sonoran Desert NM, and Organ Pipe Cactus NM. Wilderness management would be incompatible with the military purposes of the BMGR. Thus, every practicable effort will be taken to achieve management consistency throughout the contiguous land area occupied by the BMGR, Cabeza Prieta NWR, Sonoran Desert NM, and Organ Pipe Cactus NM, but these efforts also must remain consistent with the legally mandated purposes of each of these federal land areas.

Comment Summary 11.24: Alternative Management Strategies A and B are not consistent with the MLWA of 1999 or DoD Instruction 4715.3 and should be rejected because they would fail to provide for proper management and protection of natural and cultural resources and would fail to provide ecosystem management.

Commenter 11.24: YA

Response 11.24: Alternative Management Strategy A is the no-action alternative and, in accordance with 40 CFR § 1502.14(d), must be fully addressed in the EIS for the proposed INRMP. Further, Alternatives A and B could not be summarily dismissed as being inconsistent with the MLWA of 1999 and were retained for full analysis in the EIS. The planning process has demonstrated that there are many public, management agency, and scientific differences of opinion as to the elements of an appropriate management strategy for meeting the requirements of the MLWA of 1999, which include providing for the "… proper management and protection of the natural and cultural resources of [the range], and for sustainable use by the public of such resources to the extent consistent with the military purposes [of the range]…" [P.L. 106-65 § 3031(b)(3)(E)(i)]. Although Alternative Management Strategies A and B do not offer the same levels of resource protection, conservation, and rehabilitation as do Alternatives C and D, in the view of many, Alternatives A and B provide the needed levels of resource protection, conservation, and rehabilitation and a better balance between these elements and sustainable public access. Alternatives A and B also would allow for the implementation of ecosystem management principles, as required by DoD Instruction 4715.3, although not to the full extent of the proposed action, other alternatives, or the preferred alternative described in this final EIS. After reviewing the results of the draft EIS analysis and comments received on the draft EIS, the proposed action and final EIS preferred alternative selected by the Core Planning Team include some elements from Alternatives A and B, but are composed principally of elements from Alternatives C and D.

Comment Summary 11.25: You do not live here (in Ajo) and should not interfere in what should not concern you; stay away and let us live.

Commenters 11.25: AD, DC, JEM, RD

Response 11.25: The BMGR is indispensable to the Air Force and Marine Corps for meeting national defense responsibilities. Through the MLWA of 1999 and the Sikes Act, Congress has directed the Secretaries of the Air Force and Navy (acting through the Marine Corps) to assume jurisdiction for the BMGR including protecting, conserving, and rehabilitating natural and cultural resources and managing public use of those resources to be consistent with the military purposes of the range and the needs of wildlife resources. DoD Instruction 4715.3 requires that public use be consistent with ecosystem sustainability. In accordance with the mandates of the MLWA of 1999 and the Sikes Act, the Air Force and Marine Corps, together with their partner agencies, are preparing the proposed INRMP to guide management of the natural and cultural resources of the range and sustainable public use for the next 22 years. In meeting their management responsibilities for the BMGR, these agencies must control and regulate public access and use so that they are consistent with military operations and safety and security requirements. These agencies also must control and regulate public access so that it is sustainable relative to the range ecosystem and resource protection, conservation, and rehabilitation requirements. Recent changes in public access to the BMGR in the vicinity of Ajo were implemented to protect public safety relative to air-to-ground ordnance delivery training at three weapons ranges: Manned Ranges 1 and 2 and East Tactical Range (see the Surface Entry subsections of Sections 2.2.1 and 2.2.6 and Section 3.5).

Comment Summary 11.26: The fifth management strategy, the proposed action, is not described.

Commenter 11.26: RD

Response 11.26: The proposed action is composed of 17 elements selected from among the four alternative sets of 17 resource management elements that comprise Alternative Management Strategies A, B, C, and D. The proposed action is described in detail in Section 3.4.2 (see Tables 3-3 and 3-5, in particular) and in the Community Report on the draft EIS beginning on page 43 (see Tables 6 and 7, in particular).

Comment Summary 11.27: The BMGR is a military range; do not manage it as a de facto national park or wilderness.

Commenters 11.27: AF, AM, BB, BBE, BD, BH, BR, BS, CDM, CG, DG, JBR, JFC, JH, JM, JR, LO, LF, MW, NS, NW, RA, SLB

Response 11.27: The Air Force and Marine Corps have neither the legal mandate nor the intent to manage any portion of the BMGR as de facto wilderness or national park. Alternative

Management Strategies C and D and the proposed action, which is also the preferred alternative, include the conservation of BMGR unroaded areas of 3,000 acres or more by restricting development of new roads or ORV driving to the extent that these restrictions are compatible with military or other agency missions. However, no aspect of wilderness management, such as minimum tool requirements for government activities or the maintenance of solitude, would be implemented.

The mandated purposes of most national parks and monuments are to preserve and protect the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. In contrast, the MLWA of 1999, the Sikes Act, and implementing regulations for the Sikes Act provide that management of the natural and cultural resources of the BMGR incorporate measures that will protect, conserve, and rehabilitate these resources as well as support sustainable public use of these resources to the extent that these measures are consistent with the military mission of the range. The mandate from these legal instruments also requires that management of the range resources be guided by ecosystem and biodiversity conservation management principles again to the extent that these measures are consistent with the military purposes of the range. As a result of this consistency mandate, range locations identified through the proposed INRMP for resource protection, conservation, or rehabilitation, and areas identified as safe and secure for public access may be subject to the future military use that could take precedence over resource management and public access objectives established through the INRMP. In such an eventuality, the INRMP would be revised through the periodic update process to adjust resource management and public access as required. Thus, the military purposes of the BMGR will not be subject to the standards of de facto national parks or wilderness management.

Also see Response 1.11, which responds to those commenters who suggested management of unroaded areas as wilderness.

Comment Summary 11.28: It is imperative that a fair, honest, and unbiased study be mandated before any final determination or ROD is made that will in any way prohibit the communities of Ajo, Why, and Lukeville from public access to the desert that surrounds them.

Commenters 11.28: ARP, DJB, IE, MW, NS, NW

Response 11.28: The EIS for the proposed INRMP is a fair, honest, and unbiased study of the public access and other issues that are relevant to the management of natural and cultural resources on the BMGR. This EIS was prepared in accordance with 40 CFR § 1500 to 1508 and will serve as the NEPA documentation for a ROD on implementing an INRMP for the BMGR.

Public access to the BMGR is acceptable only to the extent that it is consistent with the military purposes of the range and is sustainable to the extent that the use is not inconsistent with the needs of fish and wildlife resources. In accordance with the MLWA of 1999, the Air Force and Marine Corps strive to limit BMGR closures to the minimum areas and times necessary to support military operations, public safety, and national security. Public access closure

requirements at the BMGR are explained in detail in Sections 2.2 (in particular, see the Surface Entry subsections of Sections 2.2.1 and 2.2.6), 2.6, and 3.5. As explained in Responses 1.23, 1.25, and 1.33, the road closures proposed for those areas of the BMGR in the vicinity of Ajo would not adversely curtail public access to range areas that are open for public use.

Comment Summary 11.29: We resubmit and incorporate by reference herein, our November 2000 comments. We urge the agencies to address and consider the points raised in these incorporated comments.

Commenter 11.29: LWF

Response 11.29: Your November 2000 comments, which were received after the close of the public scoping period, were incorporated in the development of the draft EIS. For example, the proposed action and Alternative Management Strategies C and D include elements for the conservation of unroaded areas. This concept follows from a recommendation made in your November 2000 comments. Overall, however, your November 2000 submittal provided a detailed outline of a specific course of management that places great priority on resource protection measures similar to those typically incorporated in national park or wilderness management. The Core Planning Team found this emphasis to be inconsistent with the requirements of the MLWA of 1999 and the Sikes Act which emphasize that: (1) the natural and cultural resources of the range be managed consistent with its use to ensure the preparedness of the armed forces; (2) management provide for the protection, conservation, and rehabilitation of natural resources on the range; and (3) management provide for sustainable multipurpose public use of those resources to the extent such use is consistent with safety requirements and military security. Nevertheless, your November 2000 comments helped to define the general tenor of the management elements incorporated in Alternative Management Strategy D.

12. Land Use and Utility/Transportation Corridors

Comment Summary 12.1: The Yuma ASH should not be constructed through the BMGR. It will destroy flat-tailed horned lizard habitat. The highway would encroach on a military reservation and, once built, would put pressure to open the BMGR to more development and pressure to sever this area from the BMGR. The highway alignment would be close to the rifle range, Cannon Air Defense Complex, within 3 miles of the EOD Operating Area, within 6 miles of a live ordnance jettison area, and within 15 miles of the Moving Sands and Cactus West target complexes. It is premature to approve the right-of-way through the BMGR before the BMGR INRMP lead agencies have a change to review the Yuma ASH Environmental Assessment (EA).

Commenters 12.1: CBD, CM, DOW, JN, LL, LWF, RE, YA

Response 12.1: The proposed action does not include an advanced approval of the Yuma ASH but simply would not preclude construction of this highway before the EA and design for this facility are finalized. The application for the Yuma ASH, including the segment that would be constructed within the BMGR near the western boundary of the range, was filed prior to 6

November 2001, when the Military Lands Withdrawal Act of 1986 terminated and jurisdiction for the range was transferred from the BLM to the Secretaries of the Air Force and Navy. The proposed action supports the continuing processing and potential approval of this application.

If the Yuma ASH were constructed through the BMGR, the Marine Corps would require that the highway be fenced to prevent access to BMGR lands from the highway. No development would be permitted along the portions of the highway that may pass through the BMGR. A highway alignment off of the BMGR, but near to the range boundary, could potentially lead to greater encroachment than an alignment on the range. Noise complaints from developments off the range could encroach on operating hours or even the location of features on the BMGR such as the rifle range. However, the ability to prevent associated development on the range would enable the Marine Corps to prevent non-compatible development.

Environmental effects associated with the proposed highway, including potential effects on the flat-tailed horned lizard, are addressed in separate NEPA documentation prepared by the Arizona Department of Transportation and the Federal Highway Administration and released for public review on 23 May 2003. While the EA was not available to the public until May 2003, the highway proponents had coordinated with affected land management agencies during the development of the EA. The EA includes several mitigation measures, including measures to visually screen the rifle range from the proposed highway and measures to mitigate for potential effects on the flat-tailed horned lizard and its habitat.

Comment Summary 12.2: Yuma County would like to see the ASH as a priority for consideration.

Commenter 12.2: GG

Response 12.2: Issues associated with the ASH are addressed in Response 12.1.

Comment Summary 12.3: Mineral extraction and sand and gravel operations should not be allowed.

Commenters 12.3: RE, RS, YA

Response 12.3: The MLWA of 1999 withdraws the BMGR from all forms of appropriation under the general land laws, including the mining laws and the mineral leasing and geothermal leasing laws (P.L. 106-65 §3031(a)(1)). Therefore, commercial mineral extraction and sand and gravel operations would not be allowed. However, the MLWA of 1999 also provides that the Secretaries of the Air Force and Navy "... may use sand, gravel, or similar mineral material resources of the type subject to disposition under [the Materials Act of 1947 (30 U.S.C. 601 et seq.)] from [the BMGR] if use of such resources is required for construction needs on [the range]" [P.L. 106-65 §3036].

Comment Summary 12.4: The EIS does not acknowledge some projects and new ordinances in Yuma County. The projects include an extension of and improvements to County 14, annexations by the City of Yuma and Town of Wellton, the Wellton-Mohawk Power Plant, new shrimp farms, a new dairy, and various residential subdivisions. New ordinances regard the airport district and Auxiliary Field 2.

Commenter 12.4: GG

Response 12.4: The recommended changes and additions have been incorporated into Section 4.15.1.4 and to the cumulative effects analysis in Chapter 6.

13. Resource Inventory and Monitoring

Comment Summary 13.1: These commenters stated that a monitoring plan and/or schedule should be included in the EIS and some state that the draft EIS fails to disclose adequate monitoring commitments as NEPA requires.

Commenters 13.1: LL, LWF, RE, YA

Response 13.1: Section 1.1.1 has been supplemented to further describe the types of projects that would be implemented following the selection of the management strategy in the ROD. Section 1.11 has been added to supplement the rationale for the programmatic nature of the INRMP. See also Responses 11.1, 11.2, and 13.1.

Comment Summary 13.2: The draft EIS fails to consider monitoring objectives or opinions recommended by reputable scientists in TNC's Report *Conservation Elements of and a Biodiversity Management Framework for the Barry M. Goldwater Range, Arizona* (Hall and others 2001), as NEPA requires.

Commenter 13.2: LWF

Response 13.2: Section 1.11 has been supplemented to indicate how TNC's report will be fully considered in the development of a resource inventory and monitoring subplan, which will be developed to support the alternative management strategy selected in the EIS ROD (see also Response 13.3). Any NEPA documentation prepared for this subplan would be tiered from the EIS for the proposed INRMP and would provide opportunity for public review and comment.

Information, concepts, and viewpoints provided by scientists such as Hall and others (2001) are extensively incorporated in the description of the BMGR environment and the analysis of the potential impacts of the proposed action and alternative management strategies on that environment. The analysis of Hall and others (2001) is first offered in the EIS in Chapter 1 in the description of the ecological significance of the BMGR (see Section 1.2.4). Chapter 2 describes the military mission and resource management setting of the BMGR. A map of the natural communities described by Hall and others (2001) is provided in this chapter in Figure 2-5 and

the overall process that TNC followed in defining the 13 natural community and 12 species conservation elements is described and Section 2.7.2. The information, concepts, and viewpoints expressed in TNC report are extensively incorporated in Chapter 4, Affected Environment, to describe the components, structures, functions, and importance of various surface water resources, vegetation communities, general wildlife species, wildlife habitats, protected species, wildfire conditions, and special management areas. Information, concepts, and viewpoints from Hall and others (2001) are incorporated in:

- Section 4.3.1.2 Surface Water Resources (draft EIS pages 4-36 and 4-38)
- Section 4.3.4 Information not Currently Available to Support Surface Water Resources (draft EIS page 4-50)
- Section 4.5.1.3 BMGR Natural Communities (draft EIS pages 4-73 and 4-74)
- Table 4-14 Ecological Characteristics of BMGR Natural Communities as Assessed by TNC (draft EIS pages 4-75 through 4-77)
- Table 4-15
- Section 4.5.2.1 Species Conservation Elements (draft EIS page 4-80)
- Section 4.5.3.4 Exotic, Invasive, or Noxious Species Survey, Control, and Monitoring (draft EIS page 4-84)
- Section 4.5.4 Information not Currently Available to Support Vegetation Resource Management (draft EIS pages 4-86 through page 4-88)
- Section 4.6.1.2 Wildlife Habitats: Desert Riparian Habitats (draft EIS pages 4-91 and 4-92)
- Section 4.6.1.2 Wildlife Habitats: Open Water Habitats (draft EIS page 4-94)
- Section 4.6.1.8 Exotic, Invasive, or Noxious Species: Non-Native Birds and Insects (draft EIS page 4-100)
- Section 4.6.1.10 Species Conservation Elements (draft EIS pages 4-102 through 4-107, page 4-110, and pages 4-117 through 4-120)
- Section 4.6.3.5 Recent and Ongoing Surveys and other Management Actions: Mammals (draft EIS page 4-136)
- Section 4.6.4 Information not Currently Available to Support General Wildlife and Wildlife Habitat Resource Management (draft EIS pages 4-139 through 4-141)
- Section 4.7.1.3 Federally Protected Species and State Listed Species that may Occur on the BMGR (various citations from page 4-158 to 4-181)
- Section 4.7.2 Interrelationship between the Military Mission and Protected Species (draft EIS page 4-190)
- Section 4.7.4 Information not Currently Available to Support Protected Species Management (draft EIS page 4-214)
- Section 4.8.1.2 Fire Potential on the BMGR (draft EIS page 4-217)
- Section 4.11.3 (Under 4.11 Special Management Areas) Existing Regulatory and Statutory Requirements and Management Plans and Actions (draft EIS page 4-244)

Information, concepts, and viewpoints from Hall and others (2001) were used to assess the environmental consequences of the proposed action and alternatives in a number of circumstances including:

- Assessment of proposed recreation services and use supervision (draft EIS Section 5.2.5 page 5-17) and general vegetation, wildlife, wildlife habitat, and wildlife waters (draft EIS Section 5.2.11 page 5-28) management elements on earth resources
- Assessment of proposed special natural/interest areas (draft EIS Section 5.3.2 page 5-45); motorized access and unroaded area management (draft EIS Section 5.3.3 pages 5-46 through 5-48 and pages 5-49 through 5-51); and general vegetation, wildlife, wildlife habitat, and wildlife waters (draft EIS Section 5.3.11 pages 5-59, 5-60, and 5-61) management elements on water resources and aggregate effects on water resources (draft EIS Section 5.3.1 pages 5-66 and 5-67)
- Assessment of proposed resource inventory and monitoring (draft EIS Section 5.5.1 page 5-93); special natural/interest areas (draft EIS Section 5.5.2 pages 5-94 and 5-95); motorized access and unroaded area management (draft EIS Section 5.5.3 pages 5-97 through 5-104); recreation services and use supervision (draft EIS Section 5.5.5 page 5-107); utility/transportation corridors (draft EIS Section 5.5.10 page 5-113); general vegetation, wildlife, wildlife habitat, and wildlife waters (draft EIS Section 5.3.11 pages 5-115 through 117); special status species (draft EIS Section 5.3.12 page 5-118); and wildfire management (draft EIS Section 5.3.16 page 5-120) management elements on vegetation resources and aggregate effects on vegetation resources (draft EIS Section 5.3.18 page 5-122)
- Assessment of proposed resource inventory and monitoring (draft EIS Section 5.6.1 pages 5-128 and 5-129); special natural/interest areas (draft EIS Section 5.6.2 pages 5-130 and 5-131); motorized access and unroaded area management (draft EIS Section 5.6.3 pages 5-135 through 5-137); and hunting (draft EIS Section 5.6.8 page 5-145) management elements on general wildlife and wildlife habitat resources
- Assessment of proposed motorized access and unroaded area management (draft EIS Section 5.7.3 pages 5-168 through 5-170) management element on protected species
- Assessment of proposed special natural/interest areas (draft EIS Section 5.11.2 page 5-216) management element on special management areas and aggregate effects on special management areas (draft EIS Section 5.11.18 page 5-228)

Information, concepts, and viewpoints from Hall and others (2001) also were used to assess the cumulative effects of the proposed action and alternatives at a number of locations including:

- Cumulative effects assessment methodology (draft EIS Section 6.1 page 6-3)
- Assessment of the effects of past and present actions on the ecological landscape and human community, additive or interactive effects of activities before 1937 (draft EIS Section 6.3.2.1 pages 6-27 and 6-31)
- Assessment of the effects of past and present actions on the ecological landscape and human community, additive or interactive effects of activities since 1937 (draft EIS Section 6.3.2.2 pages 6-33, 6-36, and 6-37)
- Assessment of the additive or interactive effects of all past, present, and reasonably foreseeable actions on the ecological landscape and human community (draft EIS Section 6.3.4 pages 6-40 and 6-41)
- Assessment of the incremental effects of the proposed action and alternatives when taken together with all past, present, and reasonably foreseeable actions on the ecological landscape and human community (draft EIS Section 6.4 pages 6-42 and 6-44)

Comment Summary 13.3: Identified gaps in information were not translated into written strategies for conducting inventories that would obtain the needed data. Incomplete or unavailable information that is relevant to determining reasonably foreseeable significant adverse effects was not developed or dismissed as unobtainable pursuant to 40 CFR §1502.22.

Commenters 13.3: LWF, YA

Response 13.3: Section 2.8.3 has been supplemented to include information about how the inventory and monitoring subplan that will be developed following the selection of the management strategy for the BMGR in the ROD. The added information also explains how the Chapter 4 subsections addressing "Information not Currently Available to Support Management" (Sections 4.2.4, 4.3.4, …, through 4.21.4) will provide at least a partial basis for developing this subplan. Section 4.1 includes an explanation that clarifies that the management data or information needs identified in Sections 4.2.4, 4.3.4, …, through 4.21.4 do not represent incomplete or unavailable information that is relevant to determining the reasonably foreseeable significant adverse effects of the proposed and alternative INRMP management strategies on the human environment as defined by 40 CFR §1502.22.

Comment Summary 13.4: The draft EIS fails to acknowledge the value of monitoring for ecosystem health as NEPA requires.

Commenter 13.4: LWF

Response 13.4: The EIS fully recognizes the role of monitoring as an essential ecosystem management tool. The first element of the alternative management strategies for the proposed INRMP is resource inventory and monitoring (see Table 3-3). Section 2.8, which has been supplemented to address other related comments, addresses the development of a resource inventory and monitoring subplan (see also Response 13.3).

Comment Summary 13.5: The draft EIS fails to consider the benefits of monitoring across social boundaries as NEPA requires and fails to provide plans to coordinates with adjacent land managers on resource inventory and monitoring.

Commenter 13.5: LWF

Response 13.5: The EIS considers the benefits of ecosystem monitoring across social boundaries and coordinating with adjacent land managers in both the resource inventory and monitoring and perimeter land use, encroachment, and regional planning element elements (see Table 3-3).

Comment Summary 13.6: The plan implies that compliance monitoring is more critical than monitoring for ecosystem health.

Commenter 13.6: LWF

Response 13.6: The range of alternative management strategies for resource inventory and monitoring builds from compliance monitoring (Alternative Management Strategies A and B) to limits of acceptable change and ecosystem monitoring (Alternative Management Strategy C) to ecological trend and ecoregional monitoring (Alternative Management Strategy D) (see Table 3-3). See Section 2.8.3 (which, as noted in Responses 13.2 and 13.3, has been improved) for a description of the inventory and monitoring approach and forthcoming inventory and monitoring subplan.

Comment Summary 13.7: We support a monitoring plan that would provide key indicators that are truly representative of the BMGR ecosystem and that would trigger corrective actions before measures of resource degradation hit critical values.

Commenters 13.7: CBD, CM, JN, YA

Response 13.7: As noted in Response 13.2, Section 2.8.3 has been improved to address the development of an inventory and monitoring subplan, including that indicators would be incorporated into the subplan. Alternative Management Strategies C and D and the proposed action prescribe the development of inventory and monitoring systems designed to measure and track the overall ecosystem and biodiversity health of the BMGR. Limits-of-acceptable change monitoring also is identified as a tool for triggering management responses to deleterious conditions that are approaching or exceeding acceptable parameters.

14. Cultural Resources

Comment Summary 14.1: Protect the cultural resources of the BMGR.

Commenters 14.1: ARP, CBD, JN, LL, LWF, RE, RH, SC, SHPO, YA, YAN

Response 14.1: In accordance with DoD Instruction 4715.3, individual plans are prepared for the management of natural and cultural resources on military installations. Cultural resource protection and management on military installations are directed by a host of applicable federal laws, federal regulations, executive orders and memoranda, federal guidelines, and military requirements (see Table 1-4).

Comment Summary 14.2: The DoD needs to consult with SHPO and the Tribes regarding the INRMP EIS, the ICRMP, and various potential management actions.

Commenter 14.2: SHPO

Response 14.2: The Air Force and Marine Corps are consulting with many agencies and tribes about these matters, including the INRMP partner agencies, the Arizona SHPO, the Advisory

Council on Historic Preservation, and 23 Native American tribes that attach cultural importance to places on BMGR. The responsibilities of DoD agencies for cultural resources protection and management under these legal instruments are embodied in an ICRMP for the BMGR. The Arizona SHPO and other parties with an interest in the agencies' management of cultural resources will be afforded an opportunity to review and comment on a draft ICRMP for BMGR in the spring of 2005. Among other requirements, the ICRMP will address SHPO's comment regarding how the agencies will fulfill their responsibilities under Section 110 of the NHPA. As explained in Section 1.6 of the EIS, development of an ICRMP for the BMGR is occurring concurrently with the development of the proposed INRMP. The proposed INRMP is planned to be consistent with the goals of the ICRMP. In accordance with Section 106 of the NHPA, the Air Force and Marine Corps are involved in ongoing consultations with the Arizona SHPO about the potential effects of the proposed INRMP, which includes management of public access and recreation, and on the ICRMP regarding the cultural resources of the BMGR. Sections 1.10 and 5.16.18.1 note that given the extent of the affected area and the available information about historic properties, the SHPO has agreed that it is appropriate for the Air Force and Marine Corps to demonstrate compliance with Section 106 of the NHPA by implementing a programmatic agreement to ensure proper protection of cultural resources on the range. A draft programmatic agreement was reviewed by the SHPO, and the SHPO's comments have been incorporated in a revised draft. On March 25, 2005, the SHPO agreed (see memo in Appendix G) that the programmatic agreement is the best approach to completing Section 106 review of INRMP implementation and agreed with the approach in the draft. The Air Force and Marine Corps expect to present a final document to the SHPO for signature in the near future. Concerned tribes also have been consulted in the drafting of the agreement, and any input from tribal reviewers will be addressed in the final version. Certain actions to implement the INRMP or to manage resources may require site-specific NEPA assessment as well as cultural resource surveys and assessments of effect to comply with the NHPA. See also Response 1.40.