



ARIZONA RIPARIAN COUNCIL

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Mail: Amy Markstein, BLM Tucson Field Office, 3201 E. Universal Way, Tucson, AZ 85756

Dear BLM,

I write on behalf of the Arizona Riparian Council (Council) to comment on the Draft Resource Management Plan (DRMP) and EIS proposed on June 29, 2018 by the BLM for the management of the San Pedro Riparian National Conservation Area (SPRNCA).

The Council was founded in 1986 as a result of the increasing concern over the rate of loss of Arizona's riparian areas. It is estimated that less than 10% of Arizona's original riparian acreage remains in its natural form. These habitats are considered Arizona's rarest natural communities. Our Council members include scientists; regulators involved in streamside activities, management, and studies; and citizens who are interested in, care about, and understand riparian areas across Arizona. The mission of the Council is to provide for the exchange of information on the status, protection, and management of riparian systems in Arizona. The Council has tracked the progress of the SPRNCA since its Congressional establishment. Over the years we have held Council meetings in Sierra Vista, conducted field trips and sponsored campouts on the river to appreciate its role as a premier riparian area.

The SPRNCA was established by the U.S. Congress in 1988 under Public Law 100-696. Congress mandated the BLM to protect specified values of the SPR. To make the protection possible Congress designated the SPRNCA corridor. This corridor, just 3-miles wide, includes the riparian area and adjacent upland. The purpose of SPRNCA, as stated in Section 102 (a) of the Arizona-Idaho Conservation Act of 1988, is to conserve, protect, and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources.

In its comments about BLM's management alternatives the Council recognizes the importance of the San Pedro River to North America's ecology. We are talking about a natural resource that functions as a crucial corridor through which many of our country's birds (and other wildlife) migrate north and south each year. Audubon's designation of the San Pedro River as an Important Bird Area (IBA) highlights its international importance. Numerous non-avian species reside there year-round too. In addition, SPRNCA attracts tourists and visitors from across the state, country, and world to experience its natural features. Its value as a tourist attraction and destination greatly benefits the local economy of Cochise County.

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Specific Comments

BLM's Proposed Alternative "C" proposes a number of actions that either directly conflict with the Congressional authorization of PL 100-696 or create conflicts that do not support the authorization.

Grazing

The San Pedro River and surrounding area has sustained the adverse impacts from grazing for more than a century.¹ Historians and hydrologists say that the condition of the San Pedro River of today is vastly different than the rather open cienega-like condition of the river valley prior to European settlement of the West.² Impacts include soil loss, severe gully formation on the uplands, expanding head cuts on innumerable unnamed small tributaries, and entrenchment of the main channel.

The Congressional designation of the National Conservation Area in 1988 and BLM's management for the past 20 years have been a welcome giant step toward its restoration and recovery. Watershed-scale actions will be required to stabilize the river. Nevertheless, the actions that BLM takes in SPRNCA – the riparian area and adjacent uplands – will play a deciding role in its rate of recovery and how it will continue to function. With so many concurrent threats and adverse impacts the management actions chosen by the BLM become all the more important.

The cattle grazing proposal under Alternative C negatively impacts virtually every other planning component – soils, vegetation, water resources, recreation, fish and wildlife, and special status species. The impacts to wildlife are well described on pages 3-48 and 3-49. It even would detract from the regional economics. Cumulatively, the impacts would adversely affect the health of SPRNCA the international wildlife corridor especially for migrating birds.

If this upland grazing option under Alternative C is implemented, cattle would be the source of fecal contamination of the water resources. Fecal matter would runoff and deposit undesired nutrients in the stream and produce algae overgrowth. Upland cattle would be a never-ending source of exotic or noxious plants and seeds. Trespass cattle would be a constant threat and management problem for short-staffed BLM range personnel.

Further, the infrastructure needed to support grazing in the uplands will extend to impacts caused by off-highway and infrastructure support vehicles. This infrastructure will adversely impact recreational visitation. For example, installation and maintenance of fences creates roads and trails that recreationists will use to explore and traverse the landscape. Biodiversity and abundance in the fragmented patches will decrease. Soil mobilized by cattle and increased traffic will be displaced into washes. These soils will wash into the river. The sediment will choke fish and other aquatic wildlife. The inevitable trespass cattle that get into the riparian zone will trample soils and vegetation, and consume the most nutritious sedges, cattails, and saplings. Identifying cattle brands on trespass cattle and locating the cattle owner is very difficult. Even if reported to BLM range staff, the removal of cattle often takes many days and requires additional intrusion by wranglers into the riparian area. This entire

¹ Bahre, Conrad Joseph. *A Legacy of Change. Historic Human Impact on Vegetation in the Arizona Borderlands*. U of Arizona Press. 1991.

² McNamee, Gregory. *Gila, The Life and Death of an American River*. Orion Books. 1994.

cascade of negative effects will be the predictable consequence of authorizing grazing in the uplands of SPRNCA.

I do not think the scenario of allowing grazing is legally defensible. I urge that BLM reject the provision of the Proposed Alternative C that would allow grazing in the uplands. I believe that the proper and legal action is the 'No Grazing' provision of Alternative D.

I conclude that the impacts of grazing are contrary to the Congressional authorization for SPRNCA. The adverse impacts make grazing a non-conforming activity in both the riparian and upland area. And even if upland grazing were possible under PL100-696 the negative environmental impacts of such upland grazing so close to the riparian area would cause a reasonable decision maker to reject it because it is a net harmful activity.

In the EIS component of the document I could not find a straightforward explanation of the economics of the proposed upland grazing under Alternative C. How much will it cost? Who will pay for the infrastructure? Who will maintain it? What will the infrastructure consist of? How much will it cost when averaged per head of cattle to install, and then to maintain per year? How often will grazing impacts be monitored? What will be the impact on BLM staffing and the NCA budget to monitor it? Will issuance of an annual grazing permit be withheld until annual or seasonal range assessments are completed? Please quantify the economic cost of the negative consequences as well. A decision maker needs a fair and honest assessment of these costs and benefits. The answers to these questions must be considered before BLM makes decision to proceed with grazing.

Water Resources

All of the Alternatives presented barely consider the potential role of beaver in benefitting water resources, restoring vegetation, and creating aquatic wildlife habitat. This is a serious shortcoming. I urge that the chosen plan continue to assess the role that beaver can play in improving a number of planning issues. Granted, there are downsides to beaver's alteration of habitat (for example, unwanted and harmful bullfrogs are attracted to their ponds). But through discussion and planning of projects they can play an efficient role on SPRNCA. I urge that you add a section to the plan that commits to future exploration of their role in selected restoration projects.

On the topic of water quantity I applaud BLM's past efforts to assert its federal claim to a quantity of water sufficient to accomplish the SPRNCA designation. The Arizona Supreme Court recently (in summer 2018) ruled to affirm ADWR's determination of water sufficiency in the basin. This decision may prompt housing and commercial development near Sierra Vista. Such development will threaten the long-term sustainability of SPRNCA. I encourage the BLM to continue to pursue this matter, in federal court if necessary, to assure the viability of the SPRNCA and the water resources it needs to protect all the values of the NCA.

Vegetation

The DRMP's appended BLM NRST 2012 report is very well done and highly informative. It will serve as a valuable baseline resource for future monitoring of the condition of the riparian area. I appreciate its inclusion in the reference materials.

In the DRMP, Section 3.4.2, page 3-31, the middle paragraph states “The San Pedro River channel sinuosity has changed little since the area was designated ...” This paragraph seems to imply some urgency to managing the meandering process through mechanical means. I think the NRST 2012 report is more opposed to active induced meanders. See NRST report pages 52-53 “Issues” and “Management Considerations”; and page 283, “Channel Evolution.” Instead, I believe the recommendation is for “[s]ound riparian management and passive restoration practices....”

The implication of my comment is that a lighter, passive approach may produce the desired meandering and stream sinuosity. The role of strategically placed tree plantings and beaver should be considered as a means to achieve restoration, depending on specific geomorphologic conditions.

Again, I think the DRMP is missing an opportunity by not discussing the potential role for beaver to affect the habitat in a positive way. I think there are opportunities within the plan to enhance beaver activity and their effectiveness in restoring ponds, slowing runoff, recharging banks, and creating aquatic habitat. There is opportunity also to conduct high quality research on their restorative potential. Sooner rather than later I encourage the BLM to convene experts in beaver ecology to specifically consider their role in the management of SPRNCA. This activity would be compatible with two additional purposes of SPRNCA: education and research. Can/should this consideration be added now to the plan?

Recreation

The Preferred Alternative is insufficient in allowing open fires. Open fires magnify the risk of human caused fires. They also increase the likelihood that campers will use downed or even standing limbs to build fires. Dead wood provides organic matter needed for wildlife and stream channel formation. In the NCA where the goal is to enhance the vegetative cover and preserve habitat the presence of open fires would not support the purpose of the NCA. I recommend that the agency’s final determination here be Alternative D on the issue of campfire.

Similarly, OHV use is disruptive to persons trying to enjoy the natural features of SPRNCA. OHV use also scatters wildlife. On this issue, Alternative D is much more protective of the natural resources. I recommend that Alternative D be selected to handle the issue of OHV use.

Hunting

The agency’s Preferred Alternative C creates a big problem. With the predominant recreational activities coming from hikers, birdwatchers, picnickers, and other tourists in the narrow corridor, averaging only about 3 miles wide, the discharge of firearms creates a safety hazard. The dense riparian vegetation often makes it difficult to see human visitors, placing them at risk of being struck by a stray bullet. Table 3-66 on page 3-149 shows 0.8% of visitors participating in hunting. The discharge of firearms also is directly disruptive to wildlife, wildlife observation, and in-the-field education. From a management standpoint, Alternative C will place BLM staff in an awkward, even dangerous, position in trying to explain to violators exactly where hunting is allowed. Figure 2-24 at least draws a clean line showing the closed area to the south of the Charleston Road. During dry spells firearm discharge can initiate fires. Also, I do not see that target shooting has been addressed at all in the plan. That would be

an even bigger problem. For all these reasons Alternative D best handles the issue of recreational hunting. Target shooting should be prohibited as a non conforming activity throughout the management area.

Fire Management

Table 3-21, Acres affected by Firebreaks. The counts shown in the table don't seem to add up to the total acreages shown. When I add them, the new acreage totals are quite similar for the 3 action alternatives: 480; 510; 510 acres.

I believe that human created fire breaks are a necessary component for managing the long-term health of SPRNCA's natural resources. The BLM needs this fire management 'tool' to reduce the risk of catastrophic fire which, unfortunately, is becoming more common in Arizona. Please choose an alternative that also minimizes the propagation of exotic species.

I also have concern that if too much camping is allowed there may be a comparable increase in human caused fires.

Wild and Scenic River Suitability

I support proceeding with suitability determinations for the Babocomari and San Pedro Rivers. The analyses in Appendix N are well presented. These two rivers will strengthen the National Wild and Scenic River System by wisely including a rural part of our state and the under-represented Chihuahuan desert ecotype. Their proximity to the US-Mexico border will enhance the NWSRS especially as we engage in discussions of trans-border ecology. Arizona and Sonora need to have protected rivers that perform all the functions of healthy streams. Inclusion in the NWSRS will help both states and may prompt Sonora to reciprocate with water management in its headwaters.

In 1988 and again in 1991 the Arizona Rivers Coalition nominated the San Pedro River for inclusion in the NWSRS.³ The Coalition identified outstandingly remarkable values as its scenic, recreational, fish and wildlife, ecological, paleontological, cultural and historic features. This nomination occurred around the time the SPRNCA was formed. The classification recommended at that time was "scenic" for all of the upper San Pedro River.

The descriptions in favor of the suitability determination are accurately described in Vol2_Appendix N, page 3-23. Both Alternatives C and D have features that make them attractive. "C" offers the most flexibility in management but sacrifices the protection provided by having several scenic and wild segments. I would prefer that BLM choose a modified Alternative "C" that adds some scenic and wild segments in areas they believe are capable of retaining their primitive character.

³ Arizona Rivers Coalition. Arizona Rivers – Lifeblood of the Desert. A citizen's proposal for the protection of rivers in Arizona, 2nd edition. March 1991. Pages 56-57.

Concluding thoughts

It would be hard to identify a riparian ecosystem in Arizona more important than SPRNCA. At just 55,990 acres it performs as the critical home and migration corridor for hundreds of species. Congress was wise to recognize the importance of the San Pedro River and mandate its protection in 1988.

The Arizona Riparian Council urges BLM to also recognize its importance and choose management actions that strengthen SPRNCA's protection. As our nation's largest land management agency the BLM is uniquely positioned and empowered to protect the nationally important resources of SPRNCA.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Flood". The signature is written in a cursive, slightly slanted style.

Timothy J. Flood, co-chair
Conservation Committee
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