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BLM Safford Field Office
ATTN: Gila-San Simon TMP
711 S. 14th Avenue
Safford, AZ 85546

December 21, 2023

Dear Safford BLM Travel Management Team,

Thank you for the opportunity to provide comments on the [Gila-San Simon Travel Management Plan Environmental Assessment](#) (DOI-BLM-AZ-G010-2017-0036-EA). These comments are submitted on behalf of the Chiricahua Regional Council, Natural Allies, and Wild Arizona.

The Chiricahua Regional Council (CRC) is a Southeast Arizona-based conservation organization that has participated in public land planning efforts in the region for over 30 years. CRC is primarily concerned with public land management policies that affect the integrity and connectivity of the biological resources in the region. The land features within the Travel Management Planning Area - Peloncillo, Gila, Pinaleno, and Santa Teresa mountain ranges, their associated basins and the Gila River watershed - are unique as high value wildlife habitats and significant for providing ecosystem connectivity for the wider region. The areas and their many cultural and ecological values are of great importance to CRC and its members.

Natural Allies (NA) is a Tucson based non-profit with a focus on public lands planning and management in the Sky Islands region (southeast Arizona and southwest New Mexico). Natural Allies' primary focus is protection of cultural and natural resources. Staff affiliated with Natural Allies have participated in public lands planning processes throughout the region for almost four decades, including lands managed by the Safford Field Office.

Wild Arizona's mission is to protect, unite, and restore wild lands and waters across Arizona and beyond, for the enrichment and health of all generations, and to ensure Arizona's native plants and animals a lasting home in wild nature. We organize and amplify multi-community voices of support for legislation and special designations; advocate for conservation science-based environmental policy and planning; and cultivate stewardship, social/environmental awareness, and well-being through outdoor volunteerism, science, and education. In 1990, Wild Arizona played a key role in securing Wilderness designations on lands managed by BLM's Safford Field Office.

The impacts of motorized transportation routes within the Gila-San Simon Travel Management planning area on wildlife and cultural areas cannot be overstated. Many of these "roads" have been user-created out of convenience and are not essential for public access. Impacts from these redundant routes contribute to fragmentation and degradation of cultural and natural resources.

We note the BLM has selected four alternatives:

Alternative A - No Action (Current Management)

Alternative B - Natural Resource Emphasis

Alternative C - Multiple Use Emphasis

Alternative D - Access Emphasis

Our primary focus will be addressing BLM's Preferred Alternative, the Multiple Use Emphasis Alternative.

The concept of Multiple Use was first codified into law by the Multiple-Use Sustained-Yield Act of 1960 (MUSYA). With this Act, the five major uses of national forests were contained in one law equally, with no use greater than any other: "it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purpose."

Though this Act was directed towards National Forest management, it's important to note this was the first time Congress had stepped in to mandate a balance between competing interests on public lands. The impetus for this Act had been a previous bias towards extraction and extractive industries, which had resulted in harm to the land, with subsequent negative impact to the public who utilized these lands for activities other than resource extraction.

Congress further codified the concept of Multiple Use and Sustained Yield with The Federal Land Policy and Management Act of 1976 (FLPMA), and applied these principles to lands managed by the Department of Interior.

FLPMA provides a clear structure for management of BLM lands. This Act instructs the Secretary of the Interior (Secretary) to manage public lands "under principles of multiple use and sustained yield." While FLPMA closely follows the tenets first provided by MUSYA, it also identified additional multiple uses (natural scenic, scientific, and historical values).

*"The term 'multiple use' means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, **watershed, wildlife and fish, and natural scenic, scientific and historical values**; and **harmonious and coordinated management of the various resources** without permanent impairment of the productivity of the land and the quality of the*

environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.”

“Multiple Use” as defined by FLPMA provides for land management direction to balance the use of resources while ensuring these resources remain available to future generations.

BLM is required by FLPMA to manage public lands according to these tenets.

Current BLM leadership has recognized the need for balance in determining the competing goals of multiple use and sustained yield. On March 30th of this year, a proposed rule was released to the public (**Interior Department Releases Proposed Plan to Guide the Balanced Management of Public Lands**), which gives additional prioritization to maintain healthy natural systems: “The proposed Public Lands Rule provides tools for the Bureau of Land Management (BLM) to improve the resilience of public lands in the face of a changing climate; conserve important wildlife habitat and intact landscapes; plan for development; and better recognize unique cultural and natural resources on public lands.”

Though not yet finalized, the proposed rule recognizes an urgent need for BLM to “steward public lands to maintain functioning and productive ecosystems and work to ensure their resilience.” This new approach is imperative for allowing BLM to “effectively manage for multiple use and sustained yield in the long term.” This is accomplished by “protection of intact native habitats, restoration of degraded habitats, and informed decision making.”

We expected the Gila-San Simon Travel Management Plan to show more balance. We expected the values of cultural resources, watershed, wildlife and fish, natural scenic, quiet recreation, scientific, and historical values, to be on par with motorized recreation and access.

Unfortunately, there is little difference between the Multiple Use (closes 494 miles) and full Access (closes 315 miles) Alternatives (179 miles difference). There is a surprisingly large difference between the Natural Resource Alternative (closes 1288 miles) and the Multiple Use Alternative – a difference of 794 miles, more than four times the difference between alternatives three and four. **This does not feel like balance.**

A much better balance would have resulted in BLM’s preferred Multiple Use Alternative being roughly halfway between the other two in terms of the numbers of miles of road closures. With the way the alternatives were developed, it appears the BLM is heavily biased towards Full Access and heavily biased against Resource Protection.

BLM’s Safford Field Office will be under heavy pressure to change-to-open the limited number of roads that would be closed via the Multiple Use Alternative. This was obvious from comments made at the public hearing on the 29th of November. Comments made by BLM officials at this same public hearing suggests a willingness to reopen roads proposed for closure under the Multiple Use Alternative.

If the agency chooses to add roads back to the Transportation System as a result of public pressure, it should close a corresponding number of road miles that are now proposed to be left

Open, to keep the total road-closed mileage at the 494 miles identified in the Multiple Use Alternative.

The additional roads that should be closed under this scenario, would be roads identified for closure in the Resource Protection Alternative, but open in the Multiple Use Alternative.

A failure to maintain 494 miles of road closures within the boundary of the project area, would invalidate the BLM's preferred alternative of Multiple Use, and render it meaningless.

Additionally, we believe the highest value areas for cultural and natural resource protection will be found in the vicinity of

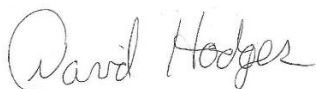
- the Gila River,
- Bonita Creek,
- Eagle Creek,
- and the areas between the Gila River and the SCAT Reservation boundary, which captures both Bonita and Eagle Creeks, as well as two high value (cultural, ecological, and scenic) Roadless Areas (Turtle Mountain, and Posthole).

Please let us know if we can answer any questions or assist in further development of this plan.

Sincerely,



Wynne Brown
President
Chiricahua Regional Council



David Hodges
Director of Conservation
Natural Allies



Kelly Burke
Executive Director
Wild Arizona