

Draft Public Scoping Comments on the San Pedro
Riparian National Conservation Area (SPRNCA)
Resource Management Plan and Environmental
Impact Statement (RMP/EIS)

Working Session
September 24, 2013

COCHISE COUNTY

Department or Committee

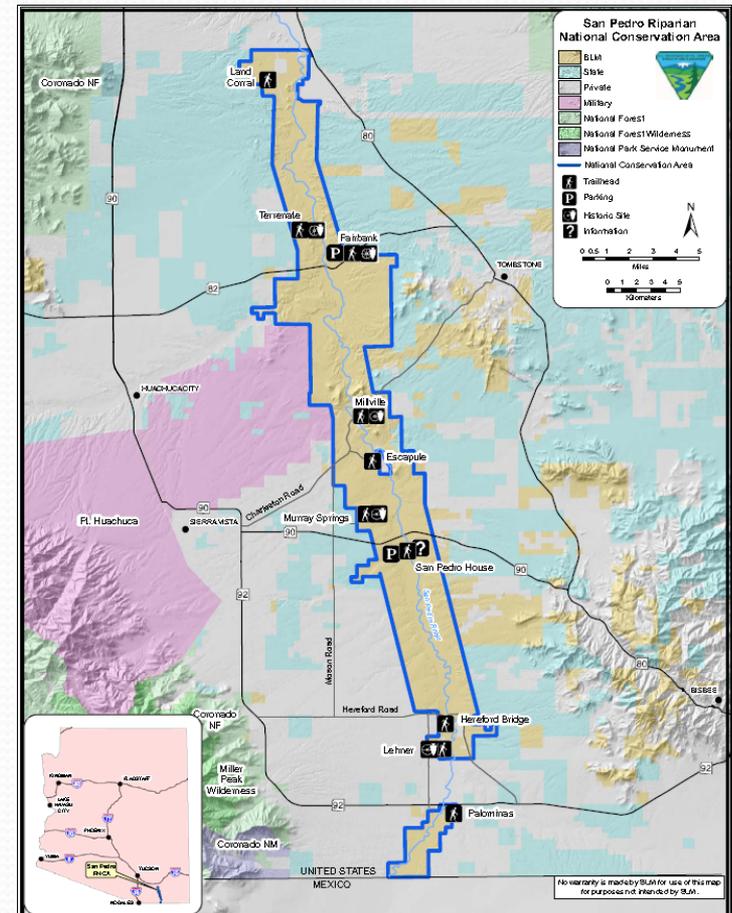


SPRNCA RMP/EIS Timeline

- SPRNCA RMP/EIS Scoping Comments are due to BLM September 27, 2013
- The public scoping process identifies the issues for inclusion in the RMP/EIS
- Today's meeting will give the Board of Supervisors an opportunity to review comments prepared by County staff and consultants as well as provide clarification on those comments and any additional comments the Supervisors or staff would like to see included.
- BLM will facilitate the formation of “Issues Groups” for each of the major issues identified
- Alternatives for inclusion in the RMP/EIS will be developed from input from the Issues Groups.

1. Planning Boundary

- The planning area boundary should include all BLM lands within the Sierra Vista Subwatershed (SVS) and Benson Subwatershed within Cochise County.
- Lands in Pima and Santa Cruz County are already being managed under another RMP.
- Selection of the entirety of BLM's lands within the SVS allows a more integrated approach to addressing issues and resources, allowing uses in some areas that are not permitted in the NCA and updating management decisions for BLM land in the SVS that are many decades old.



2. Water Quality, Quantity and/or Timing Issues

- The Upper San Pedro River (USPR) watershed has significant water quality and quantity reductions caused by water use in Mexico, outside the control of the BLM SPRNCA RMP process.
- The RMP needs to bring forward all viable alternatives to address water quality, quantity and timing issues.
- Purchase of CAP water by BLM needs to be addressed as an option.
- All alternatives need to protect valid existing water rights.
- Sufficient water for sustainable human use throughout Cochise County needs to be included as an issue.



3. Water and Riparian Interrelated Issues

- “Riparian evapotranspiration (ET) is a major component of the surface and subsurface water balance in many semiarid watersheds.” (Scott, et al., 2010)
- At the San Pedro River, the volume of riparian vegetation has increased significantly within the SPRNCA since its establishment (doubling to tripling, depending on the species evaluated).
- The active channel of the river has decreased significantly (from 423 ha in 1955 to 203 ha in 2003), while the floodplain area has increased by 14% (Stromberg, et al., 2010).
- ET from riparian vegetation in the SPRNCA exceeds precipitation; therefore, the riparian vegetation in the SPRNCA is intercepting and utilizing groundwater that would normally reach the active channel.
- In the SVS, total riparian groundwater use ranged from 11,431 to 13,377 acre-feet per year from 2001 to 2005 (Scott, et al., 2008).
- The RMP needs to address the issue of how BLM plans to balance the volume of riparian vegetation with flow in the San Pedro River to ensure that enhancement of one resource does not impact the enhancement of another resource.

3. Water and Riparian Interrelated Issues (continued)

- The statement is frequently made that the trees in the SPRNCA shade the river and thus reduce the evaporation from surface water, however, no peer-reviewed scientific publications are cited for this statement.
- The RMP needs to consider the issue of whether or not the increase in ET from the increasing riparian vegetation can be offset by a decrease in evaporation from surface water and should quantify the delta.
- This issue needs to be evaluated through the use of only peer-reviewed scientific data.



4. Riparian Habitat

- The issue of how to manage for a wide diversity of native riparian vegetation while allowing for recreation, wildlife management, and cultural resources needs to be addressed.
- Areas of high bird watching use within riparian habitat should address the number of trails including loop trails with one way traffic.
- Options to install wildlife blinds for viewers and photographers should be considered to increase public enjoyment within riparian areas while decreasing disturbance to wildlife.
- Reservation-only riparian bird nesting area visitation at certain times of year should be considered.
- A variety of easy and more difficult trails should be established through riparian corridors to spread out visitors and increase visitor enjoyment.
- A number of parking options to facilitate group, individual and handicapped opportunities close to riparian areas needs to be considered.



4. Riparian Habitat (Continued)

- Reservation-only riparian bird nesting area visitation at certain times of year should be considered.
- A variety of easy and more difficult trails should be established through riparian corridors to spread out visitors and increase visitor enjoyment.
- A number of parking options to facilitate group, individual and handicapped opportunities close to riparian areas needs to be considered.
- The value of kiosks, boardwalks, signs and other educational tools in riparian areas should be addressed.



4. Riparian Habitat (Continued)

- BLM has introduced beaver which have spread throughout the length of the SPRNCA. The issue of beaver management and its impacts on riparian vegetation needs to be evaluated in the RMP so that appropriate management decisions can be made.
- BLM has failed to manage non-native grasses (especially Johnson grass and bermuda grass) within riparian areas of the SPRNCA. (It should be noted that these grasses are spreading beyond the SPRNCA due to lack of active management by BLM in spite of efforts of others to control them.)
- While there may be advantages to the presence of these species, they appear to be out-competing the Huachuca water umbel within its critical habitat on the SPRNCA.
- The RMP needs to consider the issue of management of critical habitat for the HWU versus non-native grasses as well as the impact of failure to manage these non-native grasses on surrounding lands so that appropriate management decisions can be made.

5. Fisheries



- Due to the influx of nonnative fish from Mexico including bass and sunfish and the lack of suitable fish barrier sites on the USPR, BLM should bring forward the issue of managing the USPR as a sports fishing area.
- The opportunity to increase the number of fish for birds and other wildlife should be assessed.
- Bass, sunfish and catfish should be encouraged to provide a diversity of recreation including managing for fish-eating birds and mammals.
- AGFD fisheries biologists should be included on a team to develop a sports fishery in the USPR.
- Benefits to birds and mammals as well as fishermen should be examined.
- Introduction of threatened or endangered former native Arizona fish species within the SPRNCA should be thoroughly evaluated based on the ongoing presence and influx of non-native fish and other species which prey on these species.
- Management decisions need to be made on the practicality and potential success rate of introductions on the San Pedro River.

6. Wildlife



- A healthy balance of birds, mammals, reptiles, amphibians and insects should be included in the management plan.
- No single species should be managed to the detriment of other animals.
- A non-threatened or non-endangered species or invasive species should not be managed to the detriment of a T&E species, especially in that species' critical habitat.
- If there is a population imbalance and a game species overpopulates, BLM should address the options available to work with AGFD to allow hunting.
- Due to recreational management objectives, the issue of predator management needs to be addressed. Public safety is a concern.
- With the restoration of native grasslands, the reintroduction of pronghorn antelope in these grasslands should be considered.
- Mexican wolves are not compatible with other SPRNCA objectives.

7. Transportation/Access

- Concentration of recreationists caused by having too few access points on the SPRNCA needs to be addressed.
- The transportation needs of group, individual, handicapped and dispersed recreational visitors should be addressed.

8. Livestock Grazing

- Well managed livestock grazing should be considered to reduce fuel loads in a cost efficient manner, especially in the uplands.
- Native grassland restoration should be managed with the goal of including livestock grazing in these restored areas.



9. Groundwater

- If BLM management decisions, past, present, or future, impact the quantity of groundwater or groundwater baseflow to the river, BLM should plan to mitigate those impacts. For example, if a decision is made to further enhance riparian vegetation at the expense of increased ET thus reducing groundwater volume, BLM should be responsible for mitigating the impacts to groundwater baseflow to the river.
- Mitigation of BLM impacts to groundwater should be included as an issue. BLM should continue to monitor and reporting for groundwater wells, including ensuring sufficient funding is received for this monitoring and reporting.
- Purchase of water rights, conservation easements prohibiting development, groundwater infiltration areas, CAP water, urban enhanced run-off and stormwater recharge, and other supplemental groundwater augmentation programs should be addressed.
- BLM should be proactive in developing viable funding mechanisms to assure adequate groundwater is available to SPRNCA.
- The RMP should include a discussion of how BLM will work with Congress to fund groundwater augmentation and/or mitigation costs.

10. Sediment/Erosion

- BLM should manage upland vegetation to assure the sediment load in the USPR is in balance.
- Where necessary to maintain ponds for birdlife and other wildlife, dredging of ponds should be considered where benefits outweigh adverse impacts.
- Native grasslands are able to absorb up to an inch per hour in precipitation without significant runoff. Healthy grasslands control erosion and sedimentation.
- Precipitation that travels beyond the root zone of native grasses can be recharged to the aquifer over time.
- Grassland restoration in currently shrub-dominated areas should be evaluated so that proper management decisions can be made.



11. Local Plans

- Compatibility of RMP with local plans, zoning, ordinances and policies is a requirement of federal law and should be a priority.
- As Cooperating Agencies, the County and City have the opportunity to assure the content of their plans, zoning ordinances, policies and other rules and regulations are addressed in the RMP/EIS



12. Vegetative Management

- Consider allowing public to harvest live and dead mesquite and other unwanted trees to use as fuel wood in areas where mesquite removal is determined necessary.
- Furniture size mesquite, oak, walnut and other natural woods should be made available for harvest by the public and/or commercial furniture builders before it is destroyed.
- Non-native grasses (Lehman's, Johnson, and bermuda, among others) need to be managed within the SPRNCA and other BLM lands to prevent their spread outside the SPRNCA to the detriment of existing stands of native grasses.
- Removal of invasive shrubby vegetation in areas that were once native grasslands and native grassland restoration in currently shrub-dominated areas should be evaluated so that proper management decisions can be made.
- Fire is a natural effect in the region. Appropriate vegetation management through a well-planned and controlled use of fire should be included in the RMP.

13. Border Security

- The international border should be secured within SPRNCA to avoid threats to public safety and resource damage.

14. Socioeconomic / Environmental Justice

- Decisions made by BLM on BLM lands have a potential to impact lessees ability to remain economically viable.
- In addition, many areas of the subwatersheds contain populations that are on limited budgets. These issues should be included in the RMP.

15. Fort Huachuca



- Maintaining Fort Huachuca, its customs and culture, as well as its value in protecting our national security should be a priority.
- The BLM should work to find ways to be a good neighbor with the Fort, including ways to assure the Fort continues to have adequate water for its federal purposes.
- Fort Huachuca has expended tens of millions of dollars to mitigate its impacts on Fort-attributable groundwater use both on and off post.
- BLM should identify and fund projects that can also mitigate non-Fort-attributable groundwater use on its lands, including recharge and slow-the-flow projects.

15. Fort Huachuca (Continued)

- During the NEPA process for actions undertaken by BLM, BLM should fully consider impacts on national security.
- The electromagnetic spectrum within the San Pedro River Valley is a significant natural resource for the United States that can be damaged by human actions and infrastructure, including actions that may be undertaken by BLM or on BLM lands, including crossing of BLM lands.
- Potential impacts to the electromagnetic spectrum should be evaluated as if the electromagnetic spectrum is a natural resource, not as a “national security” issue.





Questions/Discussion