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June 12, 2015

Mr. Tim Shannon, Gila District Manager
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85756

Dear Mr. Shannon:

The June 9th presentation by you and members of your staff of the alternatives developed for the San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan/Environmental Impact Statement (RMP/EIS) was very much appreciated and provided useful information to the Cochise County Supervisors and staff and the members of the Public Lands Advisory Committee. We appreciate the opportunity to provide comments on the alternatives as currently developed.

Of primary concern is the failure of the alternatives to emphasize the economic benefits of the SPRNCA. When the enabling legislation for the SPRNCA was considered and in order to obtain local support for designation of the SPRNCA, the residents of Cochise County were assured that the SPRNCA would provide economic benefits from tourism, recreation, and ranching (grazing) to local residents. The alternatives that have been developed each fail to address how that alternative provides economic benefits to the residents of Cochise County. The County suggests that each of the alternatives include a description of how that alternative provides economic benefits, including statistical analysis of the economic benefits of previous tourism, recreation, and grazing and how the alternative would improve these benefits in the future. And, if it does not provide economic benefit for a specific alternative, then the RMP/EIS needs to clearly state that it does not.

The SPRNCA has great potential to enhance tourism in Cochise County. It is a key destination for a wide range of visitors who enjoy birding, hiking, and mountain biking as well as those who are attracted to its riparian resources, cultural and historic setting. The County suggests that the RMP/EIS alternatives should better reflect and enhance the SPRNCA's role in supporting recreation and tourism opportunities that are important to the area's economy and quality of life for local residents and visitors.

With regards to the economic benefits promised to local ranchers, unfortunately, the first thing that BLM did was to close the SPRNCA to grazing for 15 years (with the exception of four existing Arizona State Land Department (ASLD) allotments that BLM acquired). The County and local residents were not informed of the scientific basis for such closure that has now been in effect for nearly twice as long as originally planned (1988 to present). As has been repeatedly indicated to BLM in numerous cooperating agency and coordination meetings, increased grazing (plus treatment of invasive species such as salt cedar, brush control, and limiting the canopy) could result in many benefits to the SPRNCA. BLM is not currently able to maintain its fencing, and frequent incursions of unauthorized cattle (including potentially disease-carrying cattle from Mexico) have occurred. Proper management by local ranchers of grazing areas within the SPRNCA would result in repair and maintenance of fencing, more rapid identification and removal of cattle that should not be in the SPRNCA, removal of invasive species, and reduced fuel loads. As mentioned in the meeting and seen on the Las Cienegas, managed grazing is a significant tool in restoring grasslands, reducing spread of invasive species, reducing fuel levels, restoring open landscapes, and providing income to the County. There are areas within the SPRNCA that probably are not conducive to grazing (i.e. around public recreation such as the San Pedro House, significant cultural resources, and sensitive ecological areas), but for the most part grazing would have positive impact to the riparian and upland zones of the SPRNCA. The County suggests that, at a minimum, Alternative B (Resource Use Emphasis) include consideration of an expansion of the four existing allotments and/or the addition of up to 12 additional allotments, such that Animal Unit Months (AUMs) are increased to capacity (6,000 AUMs). Alternative C (Restoration Emphasis) could also include increased grazing totaling 6,000 AUMs to reduce wildland fire danger, reduce invasive species, and restore ecological balance within SPRNCA.

There are concerns with the removal of hunting from Alternative C. This is an issue that was fought at the inception of the SPRNCA designation and was finally approved with hunting allowed throughout the SPRNCA, but limited to seasonal use of firearms in specific locations outside of highly used public recreation areas and archery throughout the SPRNCA corridor. Hunting has and will continue to be a management tool utilized to control various wildlife populations and, as with grazing and recreation, is a recreational activity that provides income to the County and surrounding towns. Due to the limited access, hunters must access the area by foot, which is no different than hiking, birdwatching, or sightseeing. Hunting probably has less effects on the resource since users are not using the river corridor but rather are dispersed at times when other uses are limited (i.e. fall and winter months). The County suggests inclusion of hunting in Alternative C with proper controls associated with restoration activities.

Economic benefits can be derived from the previously submitted University of Arizona publication titled *The Contribution of the Beef Industry to Arizona's Economy: State and County Profiles* by Ashley Kerna, George Frisvold, Trent Teegerstrom, and Russell Tronstad; Cooperative Extension Department of Agricultural and Resource Economics The University of Arizona May 2014.

If you have any questions with regards to these comments or any other items discussed during the presentation, please feel free to contact Cochise County as shown in the letterhead.

Sincerely,



Patrick G. Call
Chairman, Cochise County Board of Supervisors