



Bureau of Land Management
Safford Field Office
711 South 14th Avenue
Safford, Arizona 85546

Aravaipa Canyon Recreation Access and Wildlife Corridor Land Acquisition

Final Environmental Assessment

DOI-BLM-AZ-G010-2021-0011-EA

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1.0 Introduction

1.1 Summary of Proposed Project

This environmental assessment (EA) has been prepared pursuant to the National Environmental Policy Act of 1969 (NEPA; 42 U.S.C. 4321 et seq.), Council of Environmental Quality NEPA regulations (40 Code of Federal Regulations [CFR] 1500-1508), Department of Interior NEPA implementing regulations (43 CFR Part 46), and BLM NEPA Handbook H-1790-1.

This EA analyzes and discloses the potential environmental effects of the proposal to acquire 2,802 acres of private land by the Bureau of Land Management (BLM). From this point forward, the 2,802 acres will be referred to as “the Property” (Figure 1).

Adjacent to the Property, the BLM’s Aravaipa Canyon Wilderness was established by Congress in 1990 through The Arizona Desert Wilderness Act, which designated nearly 19,410 acres of public lands in Graham County, Arizona, as wilderness to be managed by BLM in accordance with the Wilderness Act of 1964. The Aravaipa Canyon Wilderness is adjacent to the US Forest Service’s (USFS) 26,000-acre Santa Teresa Wilderness established by the Arizona Wilderness Act of 1984. These wilderness areas encompass the Santa Teresa Mountains, an area of spectacular, rugged beauty. Despite the large amounts of federal public lands in Arizona, maintaining legal public access to many such lands for recreation has been difficult due to historical land use patterns.

Through the Land and Water Conservation Fund (LWCF), the Trust for Public Lands (TPL) has approached the BLM with the opportunity to acquire the Property with the intent to provide improved legal access to public lands.. Using zero taxpayer dollars, LWCF invests earnings from offshore oil and gas leasing to help strengthen communities, preserve history and protect national endowment of lands and waters.

Arizona Game and Fish Department (AZGFD) estimates that the land acquisition would open recreational access to 30,000 acres of BLM-administered land and 9,000 acres of other public lands (USFS, Arizona State Land) by providing legal public access via existing ranch roads that are currently held in private ownership.

The Property is located in Graham County, Arizona, with a population of approximately 38,000. Land use in the surrounding area is rural in nature and has a long history of farming, ranching, recreation, and mining.

This EA analyzes in detail the following:

- The Proposed Action: The BLM would acquire the 2,802-acre Property adjacent to BLM lands, Arizona State Land Department lands, and the Aravaipa Canyon Wilderness, and lands managed by the USFS.
- No Action Alternative: The BLM would not acquire the Property.

1.2 Purpose and Need

The purpose of this proposed project is for BLM to acquire 2,802 acres of the private lands to provide the public with improved legal access to public lands including BLM managed lands northeast of Aravaipa Canyon Wilderness and west of the USFS-managed Santa Teresa Mountain Wilderness.

The need of the proposed project is established by BLM's responsibility pursuant to Title V of Federal Land Policy and Management Act of 1976, as amended (FLPMA; 43 United States Code [U.S.C] 1761) to review non-federal actions in rights-of-way over, upon, under, or through public lands, and in doing so, determine if the Proposed Action is consistent with the requirements and general provisions of this title and other applicable laws.

1.3 Decision to be Made

The authorized officer will decide whether to acquire the Property for management under BLM authority or not.

1.4 Land Use Plan Conformance

This Proposed Action is located within the area of the Safford Field Office (SFO), managed in accordance with the Safford District Resource Management Plan (RMP) and Environmental Impact Statement as approved in the Partial Records of Decision dated September 1992 and July 1994, and as amended by the Decision Record for the Land Tenure Amendment to the Safford District RMP approved in September 1994 (the "RMP Land Tenure Amendment").

The Proposed Action is in conformance with the following management objectives set forth by the Safford District RMP, as amended:

- **Lands and Realty (LR) 01** - Designate 24 Long-Term Management Areas in which the Bureau of Land Management will intensively manage public lands for their multiple resource values as defined in the Federal Land Policy and Management Act of 1976. (See Table 2-1 and Map 27 (amended). BLM will retain all public lands (surface and subsurface estate) and may seek acquisition of state land within these areas. RMP Land Tenure Amendment page 2.
- **LR02** - Private land acquisition within the 24 Long-Term Management Areas will be considered on a case-by-case basis. An analytical process will be conducted prior to acquiring private lands within these areas. This process will address the question, "Is it likely the Bureau can achieve its management objectives in the Long-Term Management Area by means other than acquisition of "fee simple title to private land?" The four alternatives that will be considered are (1), land owner education, (2), entering into Cooperative Management Agreements, (3), partial acquisition such as conservation easements, and (4), full "fee simple title" acquisition. Acquisitions will be evaluated on a case-by-case basis and will consider economic impacts as well as natural resource impacts. RMP Land Tenure Amendment page 2 & 3.
- **LR03** - The following areas are identified as Long-Term Management Areas: See Map 27 as amended. RMP Land Tenure Amendment page 3.

GILA RESOURCE AREA

Aravaipa Ecosystem
North Santa Teresa
Northwest Gila Valley
Southwest Gila Valley
Gila Box Ecosystem
Cactus Flat

- **LR06 - Land Acquisition:** The following are objectives for land acquisition within Long Term Management Areas: RMP Land Tenure Amendment page 3 & 4.
 1. Acquire lands with high public values that compliment [sic] existing management programs within Long Term Management Areas.
 2. Consolidate ownership pattern within Long-Term Management Areas to improve management efficiency.
 3. Improve service to the public.

Lands considered for acquisition will possess one or more of the following characteristics:

1. Riparian habitat
2. Watersheds of important riparian areas
3. High value wildlife habitat, including threatened and endangered species habitat and major migration corridors
4. Administrative sites
5. Land for developed recreation sites
6. Land providing access to public lands
7. Significant cultural and paleontological properties
8. Other lands with high public resource values such as inholdings in Areas of Critical Environmental Concern and other types of special management areas.

The Property is identified as a proposed acquisition area in the RMP's original Map 27 (titled the Proposed Land Tenure Adjustment Map), noted in the legend as "Proposed Acquisitions Areas: State and private lands in these areas have been identified for acquisition as they become available."

1.5 Relationship to Statutes, Regulations, Other NEPA Documents

Approximately 1,800 acres of the Property is located within the Aravaipa Ecosystem Management Planning Area and is further managed by the Aravaipa Ecosystem Management Plan (AEMP) and Environmental Assessment as approved by the Decision Record dated September 2015.

The Proposed Action is in conformance with the following management actions as described:

- Wildlife Resource Objective D.1, part 10. "Consider benefits to wildlife on any lands proposed for acquisition. *Rationale: Although the Aravaipa ecosystem is largely intact, there are missing components for which habitat restoration or acquisition can improve regeneration.*" (AEMP, p. 68).
- Travel Management Objective G.2: "Secure motorized access to public lands within the planning area. *Rationale: Historically, access availability has varied due to the discretion*

of private landowners and as a result of issues such as vandalism and littering. Securing motorized access would ensure committed access to the planning area for administrative and/or public use. The BLM will continue to pursue legal access with partners in the future.” (AEMP, p. 77).

The Proposed Action would comply with the following laws and/or agency regulations, and are consistent with applicable Federal, State and local laws, regulations, and plans to the maximum extent possible.

- Arizona Groundwater Code [Arizona Revised Statute (ARS) Title 45-Chapter 2, Articles 4 and 5]
- Arizona Desert Wilderness Act of 1990
- Clean Air Act of 1963, as amended
- Clean Water Act of 1977
- Endanger Species Act of 1973 (16 U.S.C. 1531 et seq.)
- Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.)
- Federal Land Transaction Facilitation Act (FLTFA) of 2000 (42 U.S.C. 2301 et seq.)
- Federal Noxious Weed Control Act (7 U.S.C. 2801 et seq.)
- National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665; 54 U.S.C. 300101 et seq.)
- Taylor Grazing Act of 1934
- Toxic Substance Control Act of 1976 as amended (TSCA) (15 U.S.C. 2601, et seq.)
- Wilderness Act of 1964 (16 U.S.C. 1131 et seq.)

Arizona Department of Water Resources (ADWR) regulates all groundwater wells in Arizona and administers the governing state Groundwater Code. In Arizona, landowners are not required to obtain a water right for their respective groundwater, but ADWR does require all wells be permitted to drill or “registered,” and any change in ownership be documented and well registration transferred to the new owner.

1.6 Issues Identified for Analysis

The Proposed Action was internally scoped by the BLM SFO interdisciplinary team on June 16, 2020.

For an EA, the BLM should analyze issues if the analysis of the issue is necessary to make a reasoned choice between alternatives, or the issue is significant or may have potentially significant effects. Scoping associated with this EA identified the following resources and/or issues relevant to the Proposed Action:

Issue 1 – How would access to public lands be impacted by the proposed action?

Issue 2 – What are the potential effect of the purchase of the property to recreational resources?

Issue 3 – How would general wildlife, threatened and endangered species, migratory birds, BLM sensitive species, and species of economic importance be impacted by the proposed action?

Issue 4 –How would land acquisition affect the grazing permit/lease for the existing grazing allotments?

Issue 5 – What range improvements on the Property would need to be permitted for public lands through Range Improvement Permits or Cooperative Range Improvement Agreements?

1.7 Issues Identified but Eliminated from Further Analysis

Three active mining claims were identified as a potential issue but eliminated from further analysis because located mining claims are administrative. Surface management of these claims would be transferred from split estate of private surface ownership over federal mineral estate to federal surface ownership over federal mineral estate, which would provide easier access for the claimant and full management by the BLM of surface/subsurface resources should a claimant plan to develop minerals on their claim in the future. Parcels 13-15 have severed mineral rights, and the mineral estate would remain in private ownership and be subject to BLM surface management regulations as split estate lands.

Abandoned mine land (AML) features, including open shafts/tunnels, wooden structures, and waste rock piles, were identified on the parcels as a potential issue but eliminated from further analysis. X ray fluorescent testing was conducted at the waste rock sites, and though lead and arsenic concentrations were found, it does not appear that lead is leaching from samples taken in downgradient washes. A human health risk assessment was completed for anticipated exposures to the mine wastes under expected BLM management direction as defined in the current Safford Resource Management Plan. The risk assessment found that human exposure to the mine wastes would not exceed Environmental Protection Agency and Arizona Department of Environmental Quality risk thresholds. The Proposed Action would not modify the use scenario for the acquisition parcels. If future proposed land use decisions were to change uses on these parcels changing human exposures, then BLM would need to initiate a remedial investigation/action under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA regulations provide a process parallel to NEPA, including public involvement, which replaces NEPA analysis for actions taken under CERCLA. Therefore, the analysis of potential hazardous substance releases associated with historical mining activities on the acquisition parcels is deferred to the CERCLA process and is not carried forward in this document. These AML sites would be monitored and managed as needed.

2.0 Alternatives

2.1 Alternative 1 – No Action Alternative

Under this alternative, the BLM would not acquire the Property. The Property would continue under private ownership.

2.2 Alternative 2 – Proposed Action Alternative

The Proposed Action is for the BLM to acquire 2,802 acres of the private lands (Cross F, or the Property) northeast of the Aravaipa Wilderness and west of the USFS Santa Teresa Wilderness.

The Property is located in portions of Sections 23, 24, 25, 26, 34, 35 and 36 of Township 5 South, Range 19 East; Sections, 19, 29, 30 and 31 of Township 5 South, Range 20 East; Sections 1, 3, 5, 6, 12, 14, 23 and 24 of Township 6 South, Range 19 East; and Sections 4, 5, 6, and 7 of Township 6 South, Range 20 East, Graham County, Arizona (see Figure 1).

The Proposed Action is a property acquisition only.

3.0 Affected Environment and Environmental Consequences

This chapter describes the affected environment, specifically the existing or baseline conditions relevant to each issue, followed by a description of the direct, indirect, and cumulative impacts projected to result from each alternative. In this document, the terms “effect” and “impact” are used synonymously.

The BLM is required to consider many authorities when evaluating a Federal action. Those elements of the human environment that are subject to the requirements specified in statutes, regulations or executive orders, and must be considered in all EAs, have been considered by BLM resource specialists to determine whether they would be potentially affected by the Proposed Action. These elements are identified in Appendix B, along with the rationale for the determination on potential effects. If any element was determined to be potentially impacted, it was carried forward for detailed analysis in this EA; if an element is not present or would not be affected, it was not carried forward for analysis. Appendix B also contains other resources/concerns that have been considered in this EA. As with the elements of the human environment, if these resources were determined to be potentially affected, they were carried forward for detailed analysis in this document.

3.1 How would access to public lands be impacted by the proposed action?

3.1.1 Affected Environment

The Property is located in the Aravaipa North Travel Management Area (TMA), associated with the AEMP, which contains 285 miles of primitive roads, with 147 of those miles located on BLM-managed lands. The main access route in the TMA is the graded-gravel Klondyke Road that approaches from the southeast. This route provides access from both U.S. Highway 70 near the town of Pima, and Interstate 10 from the city of Willcox. Access to the Property is along primitive roads that cross private and state-owned lands. These routes continue through the Property to USFS lands east of the Property, and to BLM-managed lands both north and west of the Property and north of the Aravaipa Canyon Wilderness Area.

3.1.2 Environmental Impacts—No Action Alternative

Under the No Action Alternative, the Property and associated routes would not be acquired by the BLM and would remain in private ownership. There would be no change to current vehicular access, and private landowners would continue to authorize or restrict access as they see fit.

Therefore, the No Action Alternative would not result in a beneficial impact to accessing public land.

3.1.3 Environmental Impacts—Proposed Action

The BLM would acquire approximately 11.7 miles of existing primitive routes, which would secure legal public access where it is currently or could potentially be restricted. Acquisition of the Property would provide additional recreational opportunities on lands that would be acquired and would provide additional legal access to the USFS-managed Santa Teresa Wilderness and the northeast section of the BLM-managed Aravaipa Canyon Wilderness. Routes that pass through the Property would connect with existing routes in the TMA.

As directed by 43 CFR 8340, BLM designates, maintains, and monitors routes as Open, Closed, or Limited. An Open designation directs that routes are open to all forms of travel, including motorized and mechanized, while a Closed designation restricts motorized and mechanized travel, but permits non-motorized/mechanized travel.

Acquired routes would be encumbered into the AEMP and assimilated into the TMA. These routes would be managed and monitored by BLM as either Open or Closed (see Figure 1). Approximately 11.6 miles would be designated as Open, and 0.06 miles designated Closed. Only one route would be designated for closure because that route connects to a road that is designated as closed in the TMA. Decisions affecting the designation of routes acquired by the Proposed Action were subject to internal scoping and review by a team of interdisciplinary specialists in December 2020. The additional spur routes, not associated to the main routes, may be closed as needed to protect resources as needed.

The routes would be maintained as primitive on an as needed basis in compliance with BLM Manuals 9113 and 9104.

The routes to be acquired all lie outside of Wilderness boundaries, therefore, there would be no increased motorized access within the Wilderness areas and impacts to the Wilderness would be less than significant. The Proposed Action would result in a beneficial to accessing public lands.

3.1.4 Cumulative Effects

Vehicular travel in the area is sparse. Traffic counts have not been collected by BLM on routes that would be acquired within the Property, however, visitor counts at the east entrance of Aravaipa Canyon for fiscal year 2020 show approximately 900 vehicles and 3,031 persons (approximately 3 persons per vehicle). Vehicular traffic counts were collected in Turkey Creek, approximately 9 miles southeast of the Property during the months of March through December 2020 and reported a total of 2,176 vehicles during those nine months. Both East Aravaipa Canyon and Turkey Creek are relatively popular destinations in the area, and vehicular traffic on routes in and around the vicinity of the Property would be expected to be less than either of those locations. Because acquisition of the Property by BLM would increase legal access to public lands, current vehicular traffic in the vicinity would be expected to increase marginally yet remain lower than nearby locations.

Cumulative effects of the No Action Alternative would be the restriction of public access to the Wilderness Areas, USFS- and BLM-administered lands surrounding the Property, and the Property itself.

3.2 What are the potential effects of the purchase of the property to recreational resources?

3.2.1 Affected Environment

The Property is currently in private ownership. The BLM-administered lands surrounding the Property are available to dispersed recreation opportunities including bird and wildlife watching, hunting, hiking, backpacking, primitive camping, and equestrian use, as are the adjacent Wilderness Areas. The transportation network in the vicinity of the Property is located within the Aravaipa North TMA and consists of a network of approximately 147 miles of BLM-managed primitive routes, which are available to off-highway vehicle (OHV) driving and touring. The Property is in AZGFD Game Management Unit 31, an important unit for mule deer, white-tailed deer, javelina, turkey, black bear, and a wide variety of small game and upland birds. Recreation access to the Property is via primitive roads.

3.2.2 Environmental Impacts—No Action Alternative

Under the No Action Alternative, the Property would remain in private ownership and any potential land use activities would occur at the owner's discretion. Public access to the Property, Wilderness Areas, and public lands in the vicinity of the Property would continue to be limited; thus, hunting and other recreation activities would not occur or would be restricted without landowner permission. Therefore, the No Action Alternative would not result in a beneficial impact to recreation.

3.2.3 Environmental Impacts—Proposed Action

The Proposed Action would open up an additional 2,802 acres to recreational use on public lands and secure legal public access to and through the Property, thereby increasing recreational access to public lands managed by BLM and USFS, including the BLM-managed Aravaipa Canyon and USFS-managed Santa Teresa Wilderness Areas. Recreationists accessing the Property would be anticipated because of the Property's proximity to small population centers and proximity to many other outdoor recreation opportunities. However, the Property's remoteness would be expected to limit the number of recreationists; therefore, recreation activity in the vicinity of the Property would be expected to increase marginally yet remain relatively low. The Proposed Action would result in a beneficial impact to recreation on public lands.

3.2.4 Cumulative Effects

Recreational activities including hunting, wildlife viewing, OHV driving, primitive camping, and other dispersed outdoor recreational opportunities would likely increase as people become aware of the Property's accessibility and the direct connectivity to adjacent public lands and Wilderness areas, although any increase in these activities would be expected to be marginal. The Property's remoteness and small anticipated increase in visitation would result in a less than significant cumulative effect.

Cumulative effects of the No Action Alternative would be the limited recreational uses of this area as the private landownership restricts access to the Wilderness areas, USFS and BLM-managed lands surrounding the Property, as well as the Property itself. There would also be the potential of the private land being sold to a different private entity and developed for other uses, further limiting the opportunities for recreation.

3.3 How would general wildlife, Threatened and Endangered Species, BLM Sensitive Species, Migratory Birds, and species of economic importance be impacted by the proposed action?

3.3.1 Affected Environment

Lying in the foothills of the Santa Teresa Mountains and with several major ravines nearby (Bear Canyon, Williamson Canyon, Arizona Gulch, and Stowe Gulch) the Property provides important habitat for a wide variety of wildlife.

The term “general wildlife” refers to all mammal, bird, invertebrate, reptile, fish, and amphibian species. BLM sensitive species and migratory birds that are protected under Federal laws or regulations are assessed in detail in Appendix F. The BLM manages habitat for fish and other aquatic organisms using several BLM manuals for guidance. Those manuals include BLM MS 6500 (Wildlife and Fisheries Management; USDI BLM 1988); BLM MS 6720 (Aquatic Resources Management; USDI BLM 1991e); BLM MS 6780 (Habitat Management Plans; USDI BLM 1981); and BLM Manual 6840 (Special Status Species Management; USDI BLM 2008c).

An AZGFD query indicated that eleven species of economic and recreation importance may occur within the project area. Gambel's quail, mule deer, white-tailed deer, Mexican desert bighorn sheep, band-tailed pigeon, javelina, mountain lion, American black bear, white-winged dove, and mourning dove all have the potential to occur within the project area. These species, along with other “watchable wildlife” species, can be found with varying abundance throughout the Property.

On April 21, 2021, an official list of threatened, endangered, and candidate species, and designated and proposed critical habitats that may occur within the action area was obtained using the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) website. The list indicated a total of six Federally listed proposed or candidate species were known or expected to occur within the Property: Mexican spotted owl, western yellow-billed cuckoo, northern Mexican gartersnake, loach minnow, spikedace and the Candidate Monarch butterfly. An additional list from the AZGFD Environmental Online Review Tool (AZGFD, N.d.) was obtained on November 20, 2020. This list indicated that an additional seven Federally listed species have the potential to occur within five miles of the Property boundary and/or within the Property: Mexican wolf, ocelot, jaguar, southwestern willow flycatcher, Chiricahua leopard frog, and Gila topminnow.

3.3.2 Environmental Impacts—No Action Alternative

Under the No Action Alternative, the Property would remain in private ownership and any potential land use activities would occur at the owner's discretion. Public access would continue to be restricted; thus, hunting, and other recreation would not occur on the Property without landowner permission. Under the No Action Alternative, impacts to wildlife are not expected to change from current conditions.

3.3.3 Environmental Impacts—Proposed Action

Under the Proposed Action, the BLM would acquire the Property including its associated wildlife habitat, thereby increasing and connecting BLM-administered land in the area. The newly acquired habitat on the Property would be managed according to applicable regulations

and policies governing the management of wildlife and wildlife habitat on adjacent public land. Hunting on the Property and adjacent Wilderness may result in some disturbance to and reduction of game species (species of economic importance), and additional recreational visitors may cause a potential increase in wildlife viewing activities. Hunting would be subject to the laws of the State of Arizona administered by AZGFD with limits set to allow for sustainable wildlife populations. Effects on wildlife due to the anticipated small increase in recreationalists to the Property and adjacent Wilderness as discussed in Sections 3.1 and 3.2 would be less than significant.

Threatened and endangered (T&E) species would not be affected by the potential increase of public use on the acquired land. Table F-1 in Appendix F provides a summary of each species and their habitat associations along with a determination of no effect from the proposed action. The expected primary result from the proposed action would be a slight increase in hunting on the Property, with the associated activities being occasional, highly dispersed, and constrained to the fall and winter hunting seasons. BLM administered land is subject to the regulations of the Endangered Species Act (ESA) and NEPA, and any future projects or developments would be analyzed in accordance with those acts, including public review and Section 7 consultation with the USFWS. The proposed acquisition does not change baseline conditions or habitat characteristics on the landscape, therefore there would be no effect on threatened and endangered species.

3.3.4 Cumulative Effects

Hunting, hiking, wildlife viewing, and other dispersed outdoor recreational activities would likely increase overtime as people become aware of the Property's accessibility. By simply transferring parcel ownership to BLM, public use is expected to be gradual, minimal, and highly dispersed. There are no designated sites, developments, or features in the area that would concentrate impacts from recreation that could impact wildlife or wildlife habitat.

Any potential increase in the harvest of wildlife species would be subject to the laws of the State of Arizona administered by AZGFD with limits set to allow for sustainable wildlife populations. BLM's management of the property would be subject to all applicable policy governing the management of public land and may improve wildlife habitat over time, which would have a cumulative beneficial effect to wildlife. Further, acquiring the parcels increases connectivity of many habitats and migration corridors, allowing for better dispersal and population mixing.

There would be no cumulative impacts to wildlife from the No Action alternative because conditions are not expected to change, unless there was future development, which would not beneficially impact wildlife or habitat. Wildlife habitat would remain in private ownership.

3.4 How would land acquisition affect the grazing permit/lease for the existing grazing allotments?

3.4.1 Affected Environment

The Property is within four BLM grazing allotment boundaries. All four allotments are currently permitted/leased and are being actively grazed. Aravaipa Allotment No. 45220 and Aravaipa South Allotment No. 45210 are the two allotments in which the majority of the Property would be acquired. These two allotments comprise the Cross F Ranch. Small portions of land also lie within the South Rim Allotment No. 45290 and the Laurel Canyon Allotment No. 45250.

Grazing allotment surface management is shown in Table 1 below. A map of the allotments and acquired property is shown in Appendix E—Maps, Figure 2.

The Aravaipa Allotment is currently managed as an active allotment with a Section 3 permit through the Taylor Grazing Act (see Table 2 below). Permitted livestock number includes use of all controlled land statuses within the allotment. The percentage of public land is based on forage availability instead of acres and is used to calculate the Animal Unit Months (AUMs) available on BLM-administered lands. An AUM is the amount of forage required by one animal unit for one month.

The Aravaipa South, Laurel Canyon, and South Rim Allotments are currently managed as a custodial with a Section 15 lease through the Taylor Grazing Act. Custodial allotments are permitted livestock use based on the AUMs available on the public lands (100 percent public land), and the individual ranch operator determines the livestock numbers and grazing system (if any) to be use.

3.4.2 Environmental Impacts—No Action Alternative

The Property and associated range improvements would not be acquired by the BLM and would remain in private ownership. There would be no anticipated change to current livestock management and no effect to the current grazing permit/leases (Table 1 and Table 2 below).

3.4.3 Environmental Impacts—Proposed Action

Acquisition of the Property would be managed in accordance with Title 43 of the Code of Federal Regulations (CFR) 4110.1-1 which states, “Where lands have been acquired by the Bureau of Land Management through purchase, exchange, Act of Congress or Executive Order, and an agreement or the terms of the act or Executive Order provide that the Bureau of Land Management shall honor, existing grazing permits or leases, such permittees or lessees are governed by the terms and conditions in effect at the time of acquisition by the Bureau of Land Management, and are not subject to the requirements of CFR 4110.1”. Existing grazing use on the Property shall be honored and will be combined with existing BLM permits as described below. Future consideration to specific resources on the Property and other BLM-administered lands would be given through the Land Health Evaluation and permit renewal process when the allotments are reviewed for renewal.

Acquisition of the Property would result in increased percentage of BLM-administered lands within the four grazing allotments (Appendix E—Maps, Figure 2). The amount of property acquired within the Laurel Canyon Allotment (less than 0.5 acre or 0.008 percent of the allotment) and the South Rim Allotment (8 acres or 0.019 percent of the allotment) would not affect the grazing leases. The change in land status on the Aravaipa Allotment (193 acres or 2.2 percent of the allotment) and Aravaipa South Allotment (2,440 acres or 20.9 percent of the allotment) would affect the percent public land AUMs and would therefore require adjustments to each associated permit/lease. The Property would continue to be available for livestock grazing as before acquisition of the Property.

Adjustments to permitted AUMs use existing summary sheets for each allotment. Allowable use varies by allotment and is averaged over the landscape. These averages are considered appropriate use estimates.

Permitted livestock numbers for the Aravaipa Allotment include use of all controlled land within the allotment. The percentage of public land is based on forage availability instead of acres and is used to calculate the AUMs available on BLM-administered lands. All 193 private acres within the allotment would be acquired. The livestock number permitted would not change (100 cattle), however, the percent public land would increase from 89 to 100 percent, and AUMs would increase from 1,068 to 1,200 (based on current use rates for public land AUMs on the allotment). Management of this allotment would remain in the active management category.

Permitted livestock numbers for the Aravaipa South Allotment include use of only BLM-administered land within the allotment (100 percent public land) the percent public land on the grazing lease would not change. With an increase in public land ownership, livestock number permitted and AUMs billed would increase. The Aravaipa South Allotment would gain 2,440 BLM-administered acres and would change from 168 AUMs to 522 AUMs (based on current use rates for public land AUMs on the allotment) and the corresponding change in number of head permitted would change from 14 cattle-year-long to 43 cattle-year-long. Management of this allotment would remain in the custodial management category. Land ownership of the No Action and the Proposed Action Alternatives are compared in Table 1 below.

Table 1. Surface Management Acreage by Grazing Allotment (Current and Proposed)

Surface Management by Grazing Allotment	Current (No Action Alternative)	Future (Proposed Action Including Parcel Acquisition)	Difference (Acres)
Aravaipa	8,709	8,709	--
Bureau of Land Mgmt.	8,368	8,709	341
Private Land	341	0	(341)
Aravaipa South	11,650	11,650	--
Bureau of Land Mgmt.	1,183	3,623	2,440
Private Land	2,502	63	(2,440)
State Trust Land	7,964	7,964	--
Laurel Canyon	5,145	5,145	--
Bureau of Land Mgmt.	287.8	288.2	0.4
Private Land	106.9	106.5	(0.4)
State Trust Land	4,751	4,751	--
South Rim	41,154	41,154	--
Bureau of Land Mgmt.	33,278	33,286	8
Private Land	7,443	7,436	(8)
State Trust Land	432	432	--

A revised permit/lease for the balance of the current 10-year term would be issued. Changes to the permit/lease are outlined in Table 2 below.

Table 2. Mandatory Terms and Conditions (Current and Proposed)

Allotment Name	Number	Livestock Number	Livestock Kind	Grazing Period Begin End	% Public Land	Type Use	Animal Unit Months
Aravaipa (current)	45220	100	Cattle	03/01 02/28	89	Active	1,068
Aravaipa (proposed)	45220	100	Cattle	03/01 02/28	100	Active	1,200
Aravaipa South (current)	45210	14	Cattle	03/01 02/28	100	Custodial	168
Aravaipa South (proposed)	45210	43	Cattle	03/01 02/28	100	Custodial	522

The Proposed Action would result in negligible increases in range inspections and monitoring activities. Changes to the permit/lease would result in minor increase in fee collection but would have little to no effect on livestock grazing across the allotment. Therefore, impacts to livestock management due to the Proposed Action would be less than significant.

3.4.4 Cumulative Effects

Livestock grazing would continue to be the primary use of the Aravaipa and Aravaipa South Allotments within the Property. The acquisition of the Property would result in changes to the existing permit/lease for each allotment resulting in an increase in annual grazing fees. Cumulative impacts to livestock grazing would be less than significant.

There would be no cumulative effects from the No Action Alternative.

3.5 How would the acquisition of additional range improvements be managed?

3.5.1 Affected Environment

The Property has existing range related infrastructure: five shed/structures, one cattleguard, four corrals, three developed springs, two dirt tanks/livestock reservoirs, two solar pumps, six storage tanks, six troughs, and five wells. There is also approximately five miles of fence and 3.6 miles of pipeline. Nearly all of the existing rangeland infrastructure is within the Aravaipa South Allotment except one storage tank in the Aravaipa Allotment as well as fences along allotment boundaries and a small amount of pipeline (Appendix E—Maps; Figure 3, Figure 4, and Figure 5). Existing improvements can be grouped into five distinct projects as follows:

Tule Spring- In section 31, Township 5 South, Range 20 East there are two springs, one called Tule Spring which fills a dirt tank, and the other is a spring originating from a mine shaft. The Mine Shaft Spring water is collected at the mouth of the shaft and piped down the hill past Tule Spring and past an unused shallow well, into a storage tank. An electric pump, powered by solar panels, pumps this water from the storage tank into the Tule Springs pipeline which extends

several miles north, west, and south with storage and troughs on State Trust Land along the route.

Stowe Spring- In section 12, Township 6 South, Range 19 East there is a spring called Stowe Spring where water is collected in a pipe and delivered to an old and new storage tank and to a homestead. The homestead contains an abandoned house (which would be removed for safety reasons prior to BLM acquisition), two large and two small storage sheds (which could be used for storage or livestock uses but would not be available for human habitation), two sets of corrals, a well, and two troughs.

Arizona Canyon- In section 33, Township 5 South, Range 19 East there is a well with solar panels which pump water to a storage tank and set of troughs inside the corral facility at that location. The water is also pumped to the south past an unused well and up the hill a half mile to a storage tank and trough. Approximately a half mile further to the south is a dirt tank and associated silt trap.

Aravaipa Well- In section 36, Township 5 South, Range 19 East there is a well which is powered by a transmission line. The water is pumped to a storage tank and trough at the location of the well, as well as being piped northwest and northeast to storage and troughs already permitted on BLM-administered land. There is also a set of corrals 0.3 miles to the northeast of the well.

Other infrastructure associated with the Property is the allotment boundary fencing and pasture fencing, pipelines to transport water, a dirt tank in section 5, Township 6 South Range 20 East, and a well in section 23, Township 6 South Range 19 East which pipes water across the Property and provides water to the residence and the private corrals on the nearby private land.

Range improvements on BLM-administered lands are permitted through Range Improvement Permits or Cooperative Range Improvement Agreements. Maintenance responsibility is designated in the permit or agreement for each project and BLM staff perform periodic range improvement inspection to ensure compliance.

3.5.2 Environmental Impacts—No Action Alternative

Livestock grazing would continue to be the primary use on the Aravaipa and Aravaipa South Allotments within the Property. Existing range improvements on privately owned lands would continue to be used as they are without the need of being permitted, management of the allotments would continue as described in the No Action Alternative with no effect.

3.5.3 Environmental Impacts—Proposed Action

With the acquisition of the Property, the above-ground range improvements described above would be acquired by the permittee. Underground improvements such as wells and casings would be acquired by the BLM. Water rights held by the seller that are associated with range improvements would be acquired by the BLM and would continue to be used with associated improvements. These improvements would continue to be used for grazing management on the allotment. Range Improvement Permits (RIPS) or Cooperative Agreements between the BLM and the current permittee would authorize the continued use and maintenance of these improvements, as well as assign project numbers in the RIPS. Periodic range improvement inspections would be conducted by BLM staff to ensure compliance with each range improvement permit or cooperative range improvement agreement.

Base property for the Aravaipa Allotment is water-based property and includes waters on both private and public lands. Water rights to base waters on the Property would be acquired by the BLM and an Assignment of Range Improvement Form (Form 4120-8) would be used to show control by the permittee to maintain the permit. There would be no change to base properties as this is sufficient for preference and permit/lease issuance. The base property for the Aravaipa South allotment is land-based and includes parcels associated with the Property. The base property for this allotment would change to other applicable base property controlled by the permittee/lessee in accordance with Title 43 CFR 4110.2-1.

The Proposed Action would result in negligible increases in ranges inspections and monitoring activity. Therefore, impacts to range management due to acquisition of range improvements on BLM land would be less than significant.

3.5.4 Cumulative Effects

Livestock grazing would continue to be the primary use of the grazing allotments within the Property. Implementation of the Proposed Action would result in acquisition of range improvements on the Property that would be permitted for use on public lands and would continue to be used as they are. The increase in periodic inspection of range improvements located on the Property would result in negligible changes to range improvement use, inspection, and maintenance for each allotment. Cumulative impacts to range improvement use would be less than significant.

There would be no cumulative effects from the No Action Alternative.

4.0 Consultation and Coordination

4.1 Summary of Consultation and Coordination

Not in action with this EA or its public involvement, the SFO received multiple letters of support concerning this action from outside organizations on behalf of TPL and their announcement of the project in 2018. Those groups include AZGFD, Graham County, The Nature Conservancy, USFS, Arizona Wildlife Federation, and Arizona Sportsmen for Wildlife Conservation. These letters can be found in Appendix G.

The preliminary EA was made available for the public to comment, soliciting substantive comments, for a 30-day period between March 3, 2021 to April 2, 2021 on BLM's ePlanning site. The BLM announced this in a News Release and posted on social media, and notified approximately 70 groups and individuals, as well as the Hopi Tribe, Gila River Indian Community, Fort Sill Apache Tribe, Mescalero Apache Tribe, San Carlos Apache Tribe, and the White Mountain Apache Tribe. Forty-six comments were received via letter, email, and ePlanning submissions. Substantive comments and the SFO IDT's responses can be found in Appendix H.

5.0 List of Appendices

Appendix A—List of Preparers

Appendix B—Table of Issues Considered

Appendix C—Acronyms and Abbreviations

Appendix D—List of References

Appendix E—Maps

Appendix F—Tables

Appendix G—Letters of Support

Appendix H—Summary of Comments

Appendix A: List of Preparers

Name	Title
Ron Peru	Lands & Realty Specialist
Sarah Sherman	Planning & Environmental Specialist
Ryan Peterson	Rangeland Management Specialist
Casey Bruner	Wildlife Specialist
Bob Wells	Outdoor Recreation Specialist
Anthony Johnson	Outdoor Recreation Specialist
Shelby Leachet	GIS Specialist
Emily Burke	Natural Resource Specialist
Amanda Eavenson	Hydrologist

Appendix B: Table of Issues Considered

Determination*	Issue	Rationale for Determination
NP = Resource not present in the area that would be impacted by the Proposed Action or other action alternative. NI = Resource present, but not affected to a degree that would require detailed analysis, or impacts disclosed previously in a separate, referenced NEPA document. PI = Resource present with potential for impact and analyzed in detail in this EA.		
NI	Air Quality	There would be no effects to air quality by acquiring the Property.
NP	Areas of Critical Environmental Concern	The Proposed Action is not located within or near an ACEC.
NI	Cultural Resources	The Proposed Action involves no ground disturbance. As such, this project would not affect cultural resources within the 2,802-acre area of potential effect. No additional analysis is warranted.
NP	Environmental Justice	<p>The Property is located in a rural area approximately 31 miles west of the town of Pima, AZ and 6 miles northwest of Klondyke, AZ in Graham County, AZ. There would be no measurable effects on income and employment and the acquisition is not expected to affect housing or public services. Furthermore, minority and low-income populations constitute 28 percent and 20 percent, respectively, of the overall populations within Graham County.</p> <p>Therefore, the proposed action would not result in disproportionate high or adverse effects on minority or low-income populations. No additional analysis is warranted.</p>
NP	Farmlands (Prime or Unique)	There are no prime or unique farmlands within or near the project area; therefore, there would be no direct, indirect, or cumulative impacts to farmlands.
NI	Floodplains	The Proposed Action is within a floodplain as defined by the Executive Order 11988 (1977). The Proposed Action is not expected to have any direct, indirect, or cumulative impacts to the floodplain.
NI	Geology/Mineral Resources	There are three active mining claims located on the Property. The Proposed Action would not impact these claims, as the subsurface

Determination*	Issue	Rationale for Determination
		minerals were already managed by the SFO.
NP	Human health and safety concerns	The Proposed Action would not affect human health and safety.
NI	Invasive, Non-native Species	One identified noxious weed population is known to occur on private lands being acquired under the Proposed Action. Once the land is acquired, actions would be considered to treat and control this population and monitor for other invasive or noxious weed populations.
NI	Lands and Realty	Graham County Electric has a easement within the area of the Proposed Action of acquiring 2,802 acres of private land. The easement will be recorded in the deed. No impacts to lands and realty actions are anticipated, therefore, no additional analysis is warranted.
NP	Lands with Wilderness Characteristics	Resource not present.
PI	Livestock Grazing Management	See detailed analysis in Chapter 3.
PI	Migratory birds, BLM Sensitive Species, and Species of Economic and Recreational Importance	See detailed analysis in Chapter 3.
NP	Native American Religious Concerns	There are no known places of Native American religious concerns within the 2,802-acre APE. As such, this Proposed Action would have no impacts to this resource. No additional analysis is warranted.
NI	Noise Resources	The Proposed Action would not affect noise resources; therefore, no additional analysis is warranted.
NP	Paleontological Resources	There are no known paleontological resources within the Proposed Action. No impacts are anticipated and no additional analysis is warranted.
PI	Recreation Resources	See detailed analysis in Chapter 3.
NI	Socioeconomics	The Proposed Action would eliminate collection of associated county property taxes. The property

Determination*	Issue	Rationale for Determination
		tax assessed for 2020 was approximately \$2070. The economic loss to the County associated with the property tax would be insignificant. Graham County is in full support of the proposed acquisition. No additional analysis is warranted.
NI	Soils	Soils on the Property are similar or the same as adjacent State and Federal lands and this acquisition would continue current management present on Federal lands. No additional analysis is warranted.
PI	Threatened, Endangered or Candidate Plant or Animal Species	A USFWS Information for Planning and Conservation (IPaC) database query on April 21, 2021 indicated that 6 threatened or endangered species may have the potential to exist in the vicinity of the project area. Additionally, an AZGFD Environmental Review Tool indicated 7 additional threatened or endangered species have the potential to exist within the project vicinity. Neither the Proposed Action nor the No Action Alternative would adversely affect threatened or endangered species. Species and determinations are listed in Appendix F.
NI	Travel and Transportation	Vehicular travel is limited to existing roads. The existing roads require high clearance vehicles. The expected small number of vehicles on roads would not have a significant impact to the existing roads. The primary and secondary access roads have perpetual easements recorded with Graham County. There would be no direct, indirect, or cumulative impacts as a result of the Proposed Action and No Action Alternative.
NI	Vegetation	There are no differences in vegetation or ecological sites between the Property and the adjacent federal lands. This acquisition would not change the vegetation on Federal lands.
NI	Visual Resources	The visual resource management (VRM) class for the area is Class II

Determination*	Issue	Rationale for Determination
		<p>and IV. The Proposed Action is not proposing to change anything on the landscape which could impact the visual resources of the project area. The acquisition of the property would remain within the Class II and IV designations. Therefore, no additional analysis is warranted.</p>
NI	Wastes, Hazardous or Solid	<p>A Phase I Environmental Site Assessment was completed on July 10, 2020. Three active mining claims were identified as a potential issue but eliminated from further analysis because located mining claims are administrative.</p> <p>Two abandoned mine land (AML) tailing sites and multiple open shafts were also identified as a potential issue but eliminated from further analysis. A human health risk assessment was completed for anticipated exposures to the mine wastes under expected BLM management direction as defined in the current Safford Resource Management Plan. The risk assessment found that human exposure to the mine wastes would not exceed Environmental Protection Agency and Arizona Department of Environmental Quality risk thresholds. The Proposed Action would not modify the use scenario for the acquisition parcels. If future proposed land use decisions were to change uses on these parcels changing human exposures, then BLM would need to initiate a remedial investigation/action under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA regulations provide a process parallel to NEPA, including public involvement, which replaces NEPA analysis for actions taken under CERCLA. Therefore, the analysis of potential hazardous substance releases associated with historical mining activities on the acquisition</p>

Determination*	Issue	Rationale for Determination
		parcels is deferred to the CERCLA process and is not carried forward in this document. These AML sites would be monitored and managed as needed.
NI	Water	BLM would acquire the property, which would not impact water in these areas.. In regard to water rights, the BLM representative will submit a change of name and will need to show proof of BLM ownership. Therefore, no additional analysis is warranted.
NI	Wetlands/Riparian Zones	BLM would acquire the property, which would not impact water in these areas. Regarding water rights, the BLM representative will submit a change of name and will need to show proof of BLM ownership. Therefore, no additional analysis is warranted.
NP	Wild Horses and Burros	There are no wild horse and burros within the vicinity of the Proposed Action. Therefore, no direct, indirect, or cumulative impacts on this critical element would occur. No further additional analysis is warranted.
NP	Wild and Scenic Rivers	There are no wild and scenic rivers within the vicinity of the Proposed Action area. Therefore, no direct, indirect, or cumulative impacts on this critical element would occur. No further additional analysis is warranted.
PI	Wilderness and Wilderness Study Areas	See detailed analysis in Chapter 3.
PI	Wildlife	See detailed analysis in Chapter 3.

Appendix C: Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
AZGFD	Arizona Game and Fish Department
AUM	Animal Unit Month
BLM	Bureau of Land Management
CESA	Cumulative Effects Study Area
CFR	Code of Federal Regulations
DR	Decision Record
EA	Environmental Assessment
ESA	Endangered Species Act
FLPMA	Federal Land Policy Management Act of 1976, as amended
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Service
OHV	Off-Highway Vehicle
RFFA	Reasonably Foreseeable Future Action
ROW	Right-of-way
SFO	Safford Field Office
T&E	Threatened and Endangered
TPL	Trust for Public Lands
U.S.C.	United States Code
USFS	United States Forest Service

Appendix D: List of References

Arizona Game and Fish Department (AZGFD). (N.d.). Arizona Environmental Online Review Tool Report – Generated Report. Produced 11/20/2020. Retrieved from <http://azhgis2.esri.com/content/map>

Bureau of Land Management (BLM). Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. 1994.

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_____. 1981. BLM MS 6700. Habitat Management Plans. Accessed 2020.

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_____. 2008. BLM MS 6840. Special Status Species Management. Accessed 2020.

U.S. Department of the Interior, U.S. Fish and Wildlife Service (USDI USFWS). (N.d.). Information for Planning and Consultation (IPaC) – Generated Report. Produced 04/21/2021. Retrieved from <https://ecos.fws.gov/ipac/>.

Appendix E: Maps

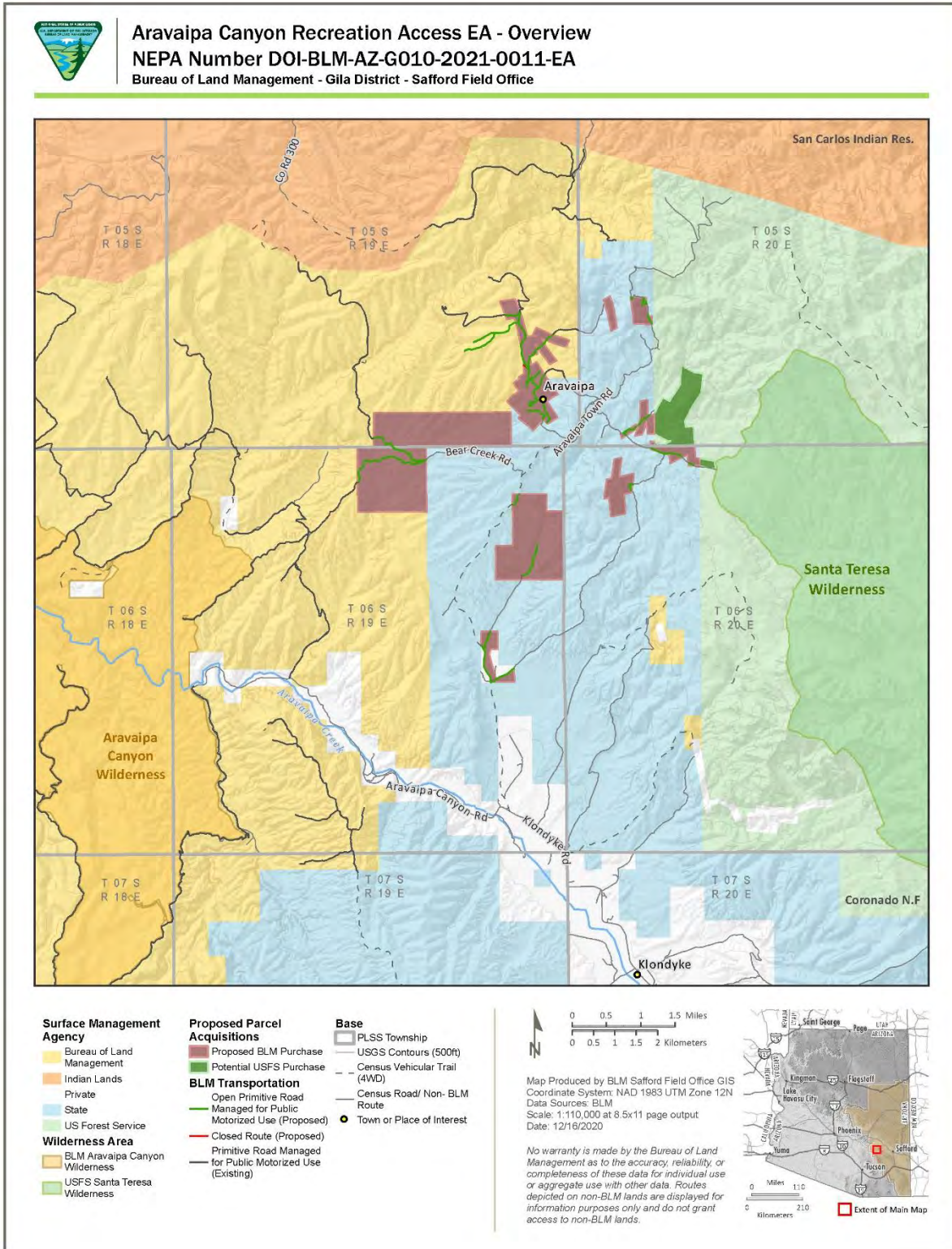
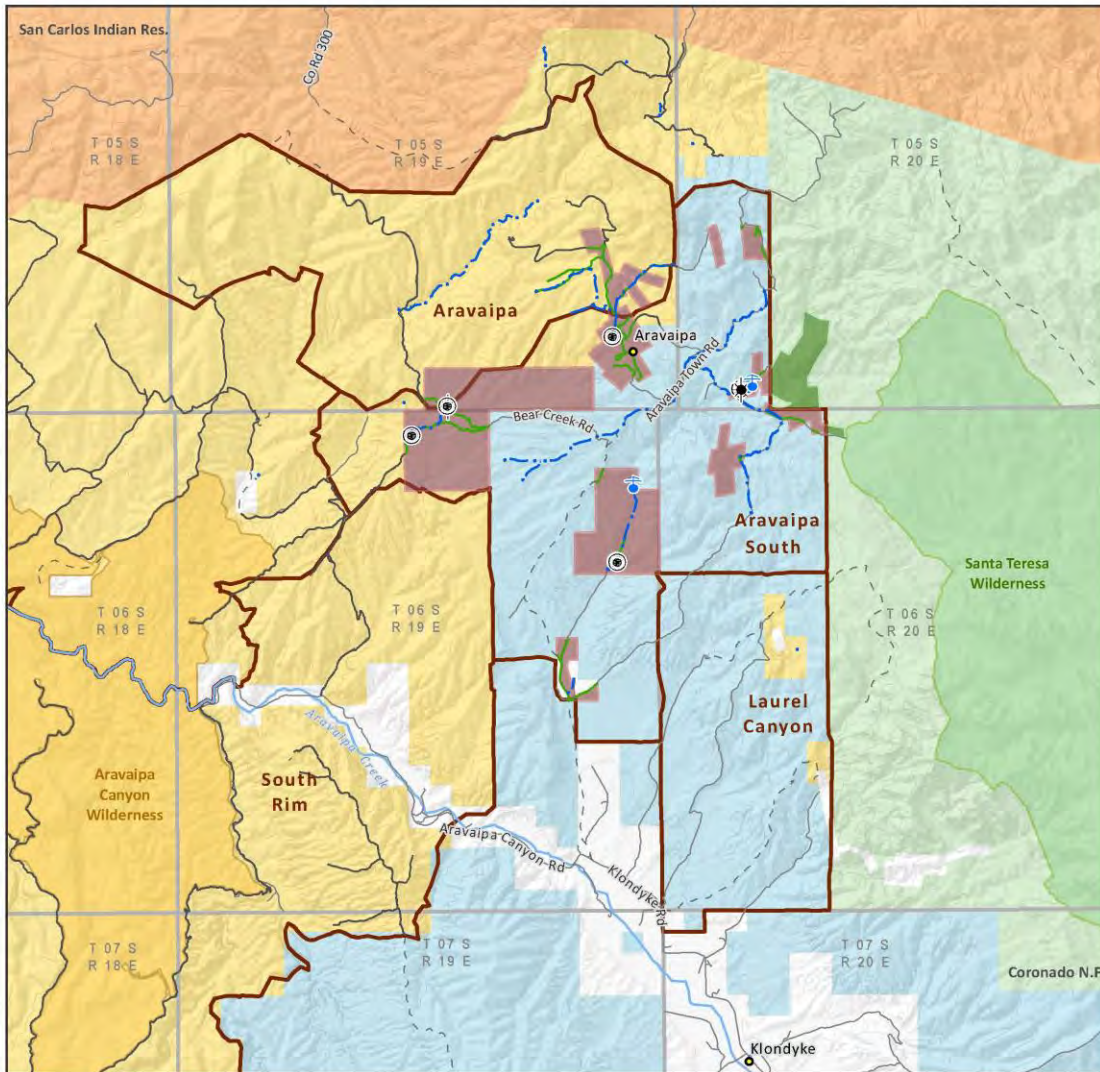


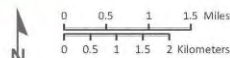
Figure 1: Project Overview



Aravaipa Canyon Recreation Access EA - Grazing Allotments
NEPA Number DOI-BLM-AZ-G010-2021-0011-EA
 Bureau of Land Management - Gila District - Safford Field Office



- | | | |
|---|--|--|
| Range | Surface Management Agency | BLM Transportation |
| <ul style="list-style-type: none"> Allotments within Project Area ● Developed Spring ☼ Solar Pump ● Storage Tank — Pipelines | <ul style="list-style-type: none"> Bureau of Land Management Indian Lands Private State US Forest Service | <ul style="list-style-type: none"> — Open Primitive Road — Managed for Public Motorized Use (Proposed) — Closed Route (Proposed) — Primitive Road Managed for Public Motorized Use (Existing) |
| Proposed Parcel Acquisitions | Wilderness Area | Base |
| <ul style="list-style-type: none"> Proposed BLM Purchase Potential USFS Purchase | <ul style="list-style-type: none"> BLM Aravaipa Canyon Wilderness USFS Santa Teresa Wilderness | <ul style="list-style-type: none"> PLSS Township USGS Contours (500R) Census Vehicular Trail (4WD) Census Road/ Non- BLM Route ● Town or Place of Interest |



Map Produced by BLM Safford Field Office GIS
 Coordinate System: NAD 1983 UTM Zone 12N
 Data Sources: BLM
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 Date: 12/17/2020

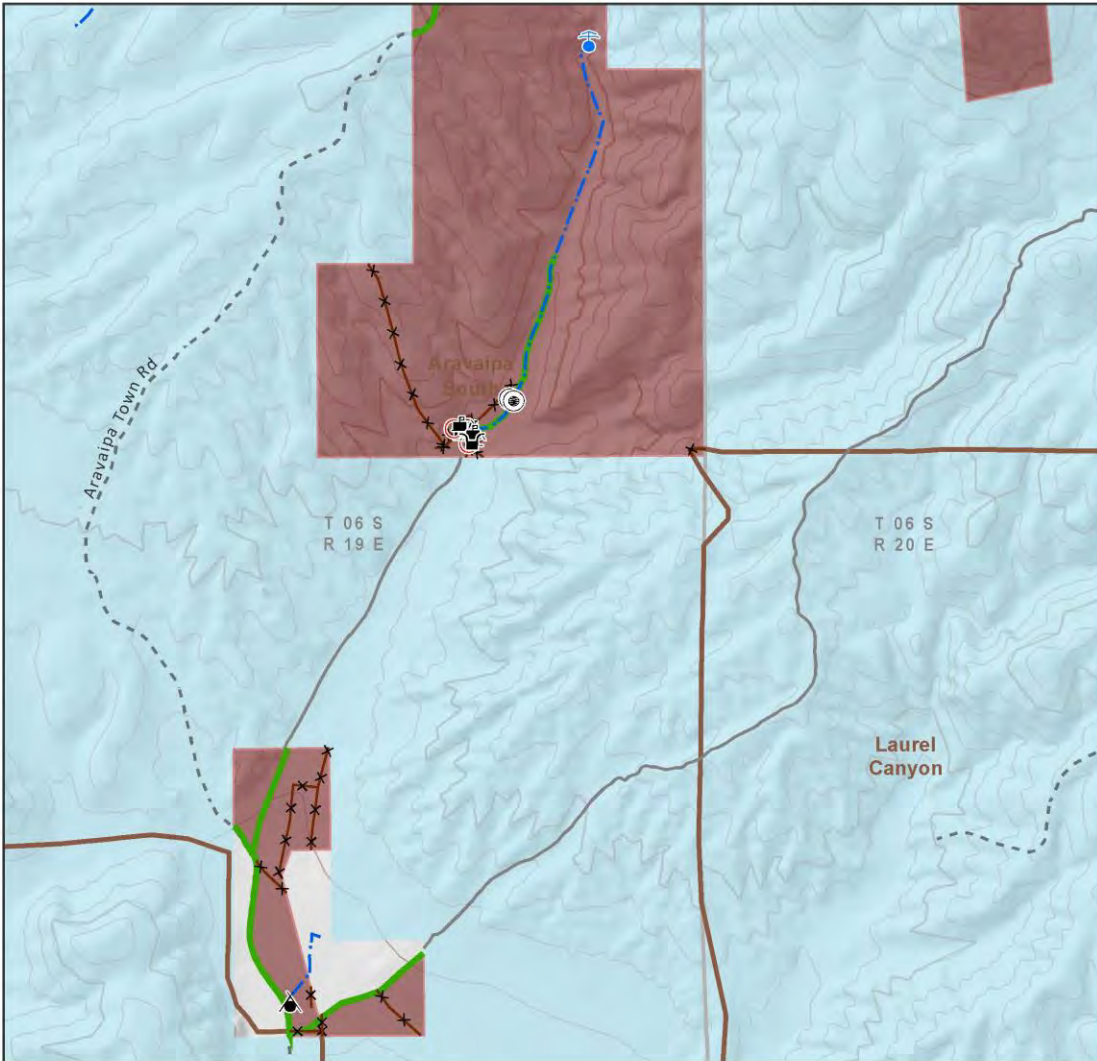
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Figure 2: Grazing Allotments in the Project Area



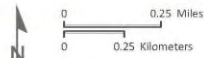
Aravaipa Canyon Recreation Access EA - Proposed Range Improvements to Acquire
NEPA Number DOI-BLM-AZ-G010-2021-0011-EA
 Bureau of Land Management - Gila District - Safford Field Office - South Map Extent



- Range Improvement Acquisition Features**
- Corral
 - Cabin
 - Developed Spring
 - Storage Tank
 - Trough
 - Well
 - Barrier is a fence
 - Pipelines

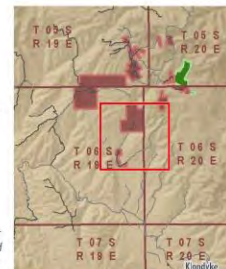
- BLM Transportation**
- Open Primitive Road
 - Managed for Public Motorized Use (Proposed)
- Proposed Parcel Acquisitions**
- Proposed BLM Purchase
- BLM SFO Grazing**
- Allotments within Project Area
- Surface Management Agency**
- Private
 - State

- Base**
- PLSS Township
 - USGS Contours 500ft
 - USGS Contours 100ft
 - Census Vehicular Trail (4WD)
 - Census Road/ Non- BLM Route



Map Produced by BLM Safford Field Office GIS
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 Data Sources: BLM, US Census
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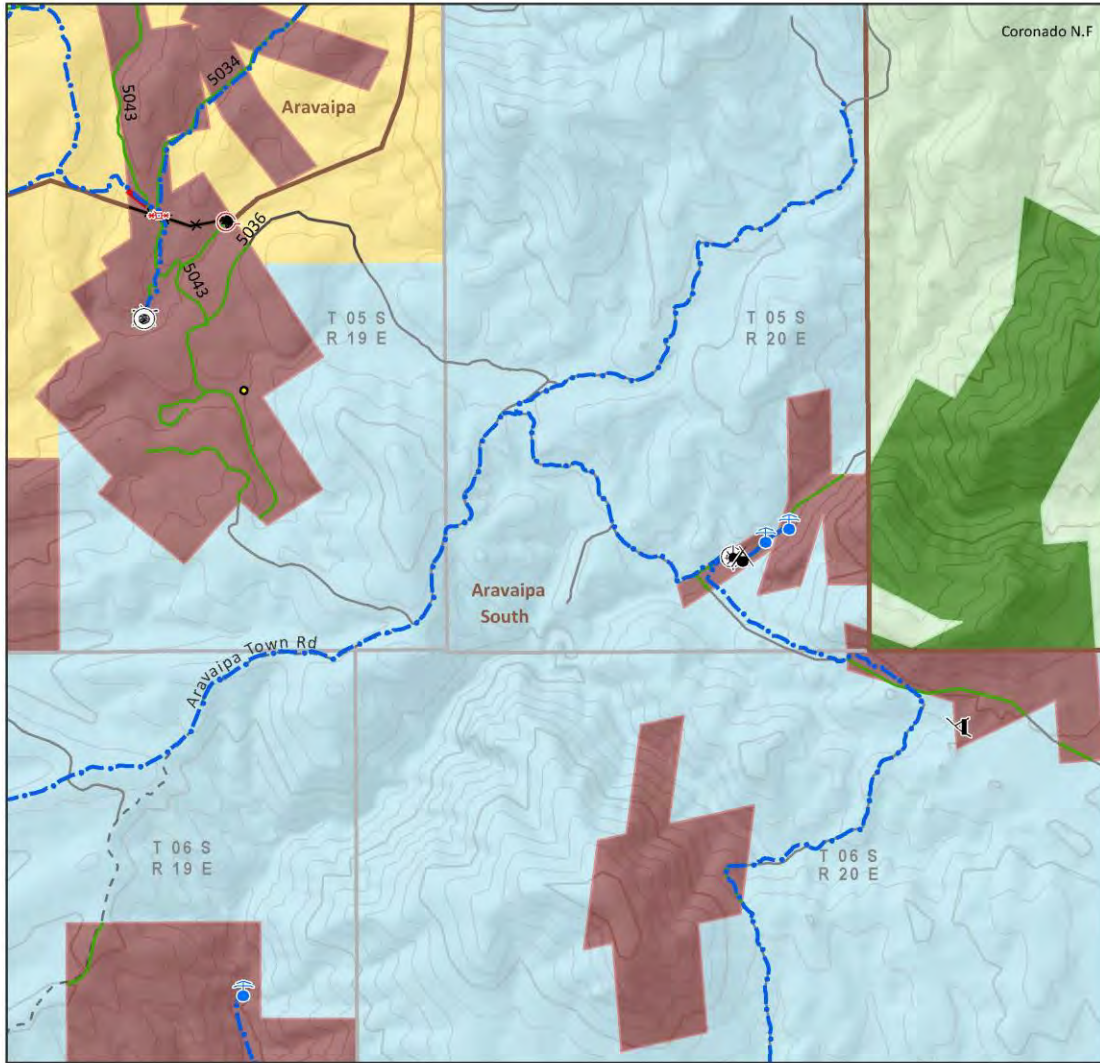


0 Miles 2.5 Main Map Extent

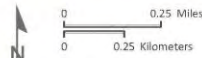
Figure 3: Acquired Range Improvements (South)



Aravaipa Canyon Recreation Access EA - Proposed Range Improvements to Acquire
NEPA Number DOI-BLM-AZ-G010-2021-0011-EA
 Bureau of Land Management - Gila District - Safford Field Office - West Map



- | | | |
|---|--|--|
| Range Improvement Acquisition Features | <ul style="list-style-type: none"> Pipelines Barrier is a fence Allotments within Project Area Developed Spring Dirt Tank Solar Pump Storage Tank Trough Well | Surface Management Agency <ul style="list-style-type: none"> Bureau of Land Management State US Forest Service Base <ul style="list-style-type: none"> PLSS Township USGS Contours 500ft USGS AZ Contours Census Vehicular Trail (4WD) Census Road/ Non- BLM Route |
| | BLM Transportation <ul style="list-style-type: none"> Open Primitive Road Managed for Public Motorized Use (Proposed) Closed Route (Proposed) Primitive Road Managed for Public Motorized Use (Existing) Proposed Parcel Acquisitions <ul style="list-style-type: none"> Proposed BLM Purchase Potential USFS Purchase | <ul style="list-style-type: none"> Town or Place of Interest |



Map Produced by BLM Safford Field Office GIS
 Coordinate System: NAD 1983 UTM Zone 12N
 Data Sources: BLM, US Census
 Scale: 1:24,000 at 8.5x11 page output
 Date: 12/17/2020

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. Routes depicted on non-BLM lands are displayed for information purposes only and do not grant access to non-BLM lands.

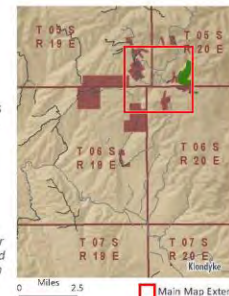
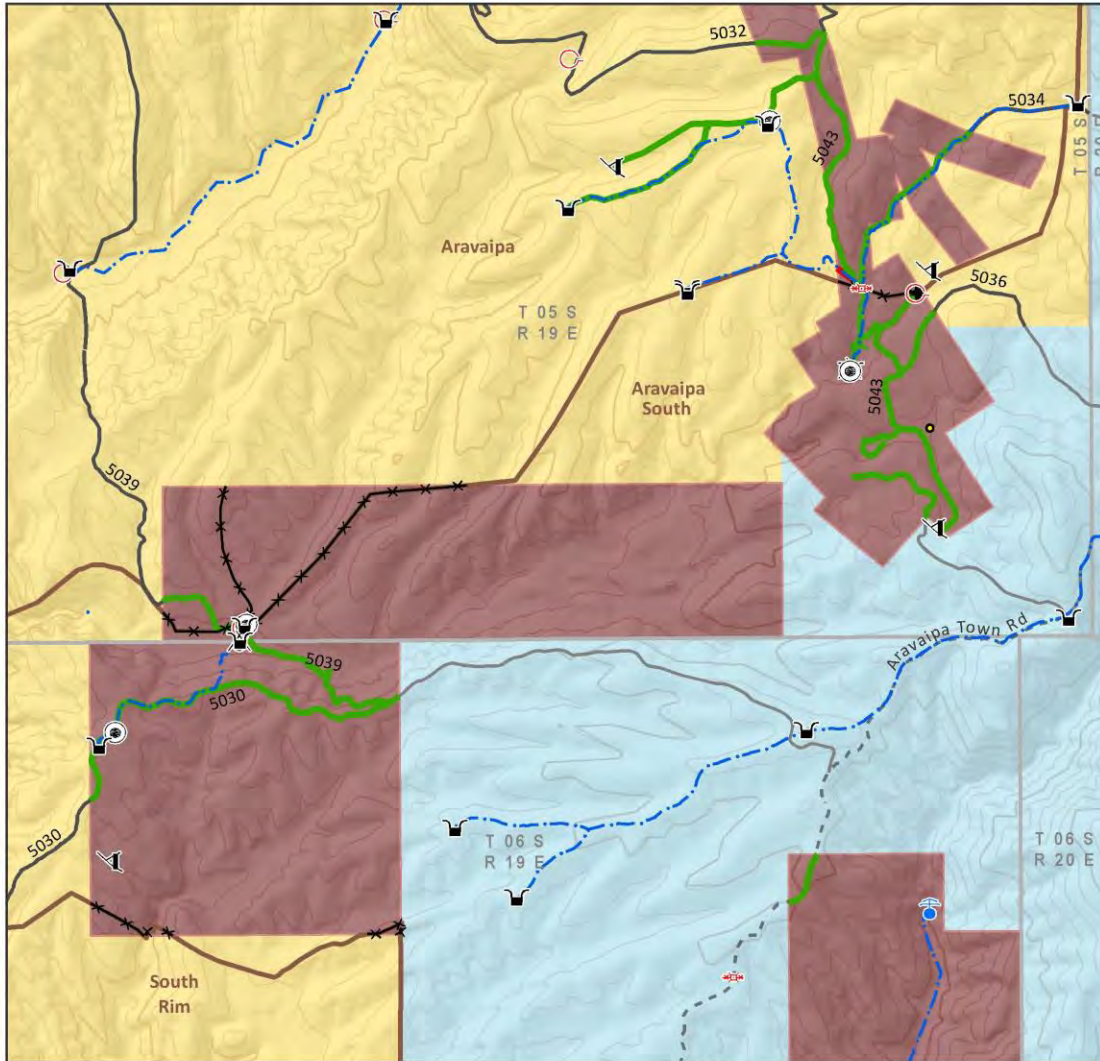


Figure 4: Acquired Range Improvements (Northeast)



Aravaipa Canyon Recreation Access EA - Proposed Range Improvements to Acquire
NEPA Number DOI-BLM-AZ-G010-2021-0011-EA
Bureau of Land Management - Gila District - Safford Field Office - West Map Extent



Range Improvement Features

- Corral
- Cattleguard
- Developed Spring
- Dirt Tank
- Solar Pump
- Storage Tank
- Trough
- Well

- Barrier is a fence
- Pipelines

BLM Transportation

- Open Primitive Road
- Managed for Public Motorized Use (Proposed)
- Closed Route (Proposed)
- Primitive Road Managed for Public Motorized Use (Existing)

Proposed Parcel Acquisitions

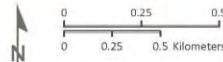
- Proposed BLM Purchase
- BLM SFO Grazing Allotments within Project Area

Surface Management Agency

- Bureau of Land Management
- State

Base

- PLSS Township
- Census Vehicular Trail (4WD)
- Census Road/ Non- BLM Route
- USGS Contours 500ft
- USGS AZ Contours 100ft
- Town or Place of Interest



Map Produced by BLM Safford Field Office GIS
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Scale: 1:30,000 at 8.5x11 page output
Date: 12/17/2020

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. Routes depicted on non-BLM lands are displayed for information purposes only and do not grant access to non-BLM lands.

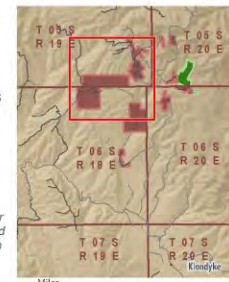


Figure 5: Acquired Range Improvements (Northwest)

Appendix F: Tables

Table F-1: List of T&E Species and Effects Determinations

Common Name	Critical Habitat	Status	Habitat Description	Effects Determination
Birds				
Mexican spotted owl <i>Strix occidentalis lucida</i>	Final	Threatened	Mexican spotted owls nest and roost primarily in high-elevation (4,000 to 10,000 feet) old growth forests: mixed conifer dominated by Douglas-fir, pine, or true fir and pine-oak forests dominated by ponderosa pine and Gambel oak. Secondly, in steep, narrow canyons with cliffs and perennial water. A portion of the Property overlaps critical habitat along the Coronado national forest boundary. Owl territories and nesting habitat would not be affected by the land acquisition.	<i>No Effect</i>
Western yellow-billed cuckoo <i>Coccyzus americanus</i>	Proposed	Threatened	The Property is within proposed critical habitat, though it does have suitable riparian plant communities, such as cottonwood galleries, to support breeding and dispersing birds. Cuckoo territories and nesting habitat would not be affected by the land acquisition.	<i>No Effect</i>
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	Final	Endangered	The Property is not within critical habitat, though it does have suitable riparian plant communities, such as hardwood galleries, to support dispersing and migrating birds. Flycatcher territories and nesting habitat would not be affected by the land acquisition.	<i>No Effect</i>
Mammals				
Ocelot <i>Leopardus pardalis</i>	No designation	Endangered	There is no record of species occurring within property vicinity. There is no designated or proposed critical habitat for this species. Ocelots require contiguous vegetation for dispersal and are found in extreme southern Arizona, though recent documentation is sparse. Individuals and their habitat would not be affected by the land acquisition.	<i>No Effect</i>
Mexican gray wolf <i>Canis lupus baileyi</i>	None	Experimental Population, Non-Essential	There is no record of species occurring within Property vicinity. Wolves are highly generalized and utilize large areas of land as home ranges and for dispersing. Individuals and their habitat would not be affected by the land acquisition.	<i>No Effect</i>
Jaguar <i>Panthera onca</i>	Final	Endangered	The Property is not within the designated critical habitat nor is there any record of the species occurring within the Property vicinity. Suitable jaguar habitat has all or many of the following characteristics: abundant prey; terrain heterogeneity and ruggedness; year-round water sources with canopy cover; connectivity to suitable habitat in Mexico; and isolation from human presence and	<i>No Effect</i>

Common Name	Critical Habitat	Status	Habitat Description	Effects Determination
			development. Individuals and their habitat would not be affected by the land acquisition.	
Fish, Amphibian and Reptiles				
Gila Topminnow <i>Poeciliopsis occidentalis occidentalis</i>	No designation	Endangered	Inhabit small streams, springs, and ciénegas below 5,000 feet within the Gila River Basin. Uses primarily shallow, warm, quiet waters with aquatic vegetation and debris cover. Tule and Mine Shaft springs may provide suitable habitat for this species.	<i>No Effect</i>
Loach Minnow <i>Tiaroga cobitis</i>	Final	Endangered	The Property is not located within critical habitat. The upper portion of Stowe Gulch creek may provide limited suitable habitat to support the species. Occurs in perennial creeks and rivers below 8,000 feet. Typically found in shallow, turbulent riffles with gravel and cobble substrate. This species is found throughout Aravaipa Creek.	<i>No Effect</i>
Spikedace <i>Meda fulgida</i>	Final	Endangered	The Property is not within critical habitat. Found in moderate to large perennial streams typically under 6,000 feet. Occurs in moderate to fast velocity waters over gravel and rubble substrates. Aravaipa Creek supports the only known extant natural population in Arizona.	<i>No Effect</i>
Chiricahua leopard frog <i>Lithobates chiricahuensis</i>	Final	Threatened	The Property is not within critical habitat and there is no record of species occurrence. CLP are found in permanent or semi-permanent springs, livestock tanks, and streams in the upper portions of watersheds at elevations between 3,000 and 9,000 feet. Some portions of the Property may be at high enough elevation and with suitable year-round water to support this species.	<i>No Effect</i>
Northern Mexican gartersnake <i>Thamnophis eques megalops</i>	Proposed	Threatened	NM gartersnake depend on lotic and lentic habitats that include ciénegas and stock tanks (earthen impoundments), and rivers containing pools and backwaters. Most frequently found between 3,000 and 5,000 feet but may occur up to approximately 8,500 feet. Use adjacent terrestrial habitats for foraging, thermoregulation, gestation, shelter, immigration, emigration, and brumation. Found in areas of high native prey (fish and leopard frogs) concentration. The Property is not within proposed critical habitat and there is no record of species occurrence. Although it has suitable riparian plant communities to potentially support this species.	<i>No Effect</i>
Invertebrates				
Monarch butterfly <i>Danaus plexippus</i>	No designation	Candidate	Western populations of this widespread species undergo long-distance migration to the California coast and Baja California to use forest groves sheltered from winds for overwintering and diapause. On return to	<i>No effect</i>

Common Name	Critical Habitat	Status	Habitat Description	Effects Determination
			<p>Arizona, individuals oviposition on obligate milkweed host plants which later serve as a food source for larval offspring. Adult monarchs require a diversity of blooming nectar sources along breeding and migration corridors. The Property has some of the characteristics to provide habitat for some portion of the monarch life cycle.</p>	

Source: USDI USFWS IPaC Report, retrieved April 21, 2021 (USFWS N.d.)

Table F-2 List of BLM Sensitive Species and Impacts

Species	Habitat Description	Likelihood of Presence	Impacts
Birds			
American peregrine falcon <i>Falco peregrinus anatum</i>	This species breeds in open landscapes with cliffs for nest sites. During migration and winter periods, you can find the species in nearly any open habitat, but with a greater likelihood along or near large bodies of water and mudflats. The Property is within their year-round habitat range. The Property contains or is near suitable nesting and foraging habitat.	Moderate potential to occur on the Property due to limited habitat suitability.	The Proposed Action would not impact the species.
Desert Purple martin <i>Progne subis hesperia</i>	This species breeds in densely vegetated Sonoran desertscrub habitats where large saguaros with many cavities are in abundance. The species is known to use establish riparian habitat with permeant water near the area.	Low potential to occur in the Property due to limited habitat suitability.	The Proposed Action would not impact the species.
Bald eagle <i>Haliaeetus leucocephalus</i>	Typically nest in forested areas adjacent to large bodies of water. They prefer to perch on tall, mature coniferous or deciduous trees that provide a wide view of their surroundings. The Property is within their nonbreeding habitat range.	Low potential to occur on the Property due to limited habitat suitability.	The Proposed Action would not impact the species.
Ferruginous hawk <i>Buteo regalis</i>	Breed in grasslands, sagebrush country, saltbush-greasewood shrublands, and edges of pinyon-juniper forests at low to moderate elevations. They winter in grasslands or deserts with abundant rabbits, gophers, or prairie dogs.	Low potential to occur on the Property due to lack of overwintering habitat suitability.	The Proposed Action would not impact the species.
Northern Goshawk	This species is a forest habitat generalist preferring ponderosa pine, spruce fir, mixed species forests	Low-to-moderate potential to occur on the Property due to limited habitat suitability.	The Proposed Action would not impact the species.
Golden eagle <i>Aquila chrysaetos</i>	Inhabit open and semi open country with native vegetation. They are found mainly in mountainous areas, canyonlands, rimrock terrain, and riverside cliffs and bluffs. They nest on cliffs and steep escarpments in grassland, chapparal, shrubland, forest, and other vegetated areas. The Property is within their year-round habitat range. The Property is in non-breeding habitat due to a lack of mountains, canyons, or large trees.	Moderate potential to occur on the due to some nearby habitat suitability.	The Proposed Action would not impact the species.
Mammals			
Arizona myotis <i>Myotis occultus</i>	Arizona myotis occurs in ponderosa pine and oak-pine woodlands near water.	No potential of the species occurring on the Property due to lack of suitable habitat.	N/A
Banner-tailed kangaroo rat <i>Dipodomys spectabilis</i>	This species lives in open Desertscrub, creosote bush flats, open grasslands and sandy places. It favors a sparse covering of grasses, interspersed with a few mesquite trees and cacti.	Low-to-moderate potential to occur on the Property due to limited habitat suitability.	The Proposed Action would not impact the species.

Species	Habitat Description	Likelihood of Presence	Impacts
Black-tailed prairie dog <i>Cynomys ludovicianus</i>	Today, the black-tailed prairie dog is considered absent from the state of Arizona due to predation, extermination by landowners, and the loss of native grasslands; therefore, there would be no impact to this species.	No potential of the species occurring on the Property due to lack of suitable habitat.	N/A
Cave myotis <i>Myotis velifer</i>	This species forms colonies in caves, mines, buildings, and sometimes under bridges. They are aerial insectivores feeding on a variety of insects, primarily from three orders: Lepidoptera, Coleoptera, and Hymenoptera.	Moderate potential of the species occurring on the Property due to presence of suitable habitat.	The Proposed Action would not impact the species.
Greater western bonneted bat <i>Eumops perotis californicus</i>	This species roosts in cliff-face crevices and feeds high above the ground. They are rarely seen and only approach the ground at a few select drinking sites. They are only found in close proximity to perennial bodies of water.	Moderate potential of the species occurrence on the Property due to nearby suitable habitat.	The Proposed Action would not impact the species.
Allen's Lappet-browed Bat <i>Idionycteris phyllotis</i>	Caves and abandoned mines, riparian areas and woodlands	High - the project area contains suitable habitat and the species' known range occurs within the project area	The Proposed Action would not impact the species.
Pale Townsend's big-eared bat <i>Corynorhinus townsendii pallescens</i>	This species occurs in pine forests and arid desert scrub, always near caves or other roosting sites.	Low potential of the species occurring on the Property due to lack of suitable habitat.	The Proposed Action would not impact the species.
Spotted bat <i>Euderma maculatum</i>	Spotted bats are strongly associated with cliff faces near water sources such as a springs, rivers, creeks or lakes.	Moderate potential of species occurrence due to nearby suitable habitat.	The Proposed Action would not impact the species.
Amphibians & Reptiles			
Desert mud turtle <i>Kinosternon sonoriense sonoriense</i>	The desert mud turtle is a subspecies of the Sonora mud turtle (<i>Kinosternon sonoriense</i>). This species is usually found in spring, creeks, ponds, and intermittent streams. They typically inhabit oak-to-pinyon-juniper woodlands or pine-fir forests but may occasionally be found in desert and grassland areas.	Low-to-Moderate potential of the species occurring on the Property due to nearby suitable habitat.	The Proposed Action would not impact the species.
Lowland leopard frog <i>Lithobates yavapaiensis</i>	This species occurs in permanent or nearly permanent waters of streams, rivers, ciénegas, cattle tanks, and other impoundments in Sonoran desertscrub, semi-desert grassland, and upslope into oak woodlands, as well as agricultural lands. However, dispersing individuals may be found in uplands or ephemeral waters.	Present	The Proposed Action would not impact the species.
Fish			
Longfin Dace <i>Agosia chrysogaster</i>	Longfin Dace prefer shallow run and glide habitats with sandy or gravely bottoms.	Low potential of the species occurring on the Property due to	The Proposed Action would not

Species	Habitat Description	Likelihood of Presence	Impacts
		lack of suitable habitat.	impact the species.
Speckled Dace <i>Rhinichthys osculus</i>	Benthic dweller that inhabits shallow (<20cm) riffle habitat with moderate velocities over gravel, pebble, and cobble substrates.	No potential of the species occurring on the Property due to lack of suitable habitat.	The Proposed Action would not impact the species.
Desert Sucker <i>Pantosteus clarkii</i>	Benthic dweller that feeds and breeds in riffles with moderate velocities over gravel and cobble substrates. Adults will take refuge in pools and undercut banks during daylight hours.	No potential of the species occurring on the Property due to lack of suitable habitat.	The Proposed Action would not impact the species.
Sonora Sucker <i>Catostomus insignis</i>	Occurs in various habitats, but prefers deep, quiet pools with cover, such as woody debris, over sand and gravel substrates. Also, utilizes deep undercut banks with overhanging vegetation.	No potential of the species occurring on the Property due to lack of suitable habitat.	The Proposed Action would not impact the species.
Roundtail Chub <i>Gila robusta</i>	Occurs in pools and eddies of mid-sized to larger rivers with areas of cover, such as boulders, logs, and undercut banks.	No potential of the species occurring on the Property due to lack of suitable habitat.	The Proposed Action would not impact the species.
Plants			
Fish creek fleabane <i>Erigeron piscaticus</i>	This species occurs in Moist, sandy canyon bottoms in perennial streams	Low - the project area is outside of this species' known distribution; however, suitable habitat may be present in the project area	The Proposed Action would not impact the species.

Source: AZGFD Report, retrieved November 20, 2020 (AZGFD N.d)

Table F-3: Migratory Birds and Birds of Conservation Concern

Migratory Birds and Birds of Conservation Concern	
Species	Comments
American peregrine falcon <i>Falco peregrinus anatum</i>	Addressed as a BLM special status species above.
Bald eagle <i>Haliaeetus leucocephalus</i>	Addressed as a BLM special status species above.
Bell's vireo <i>Vireo bellii</i>	Found in dense shrubby or scrubby habitat, including brushy fields, early successional growth, riverine scrub, coastal chaparral, scrub oak, mottes (isolated patches) of shrubs and trees in prairies, saltcedar stands, and mesquite bosques. Especially in arid regions, Bell's Vireos are found along streams or in dry arroyos and gulches. Even when large trees such as cottonwoods and willows are present, the vireos tend to stay more in the low vegetation. They avoid open desert scrub, grasslands, and cultivated areas. Moderate potential to occur on the Property.
Bendire's thrasher <i>Toxostoma bendirei</i>	Found in desert habitats including arid grasslands, shrublands, agricultural habitats. Use more open areas with shorter vegetation, suitable habitat exists within the Property though this bird in uncommon. Low potential to occur on the Property.

Migratory Birds and Birds of Conservation Concern	
Species	Comments
Black-chinned sparrow <i>Spizella atrogularis</i>	Black-chinned sparrows are locally common in dry brushlands and chaparral from near sea level to 8,000 feet. They associate with sagebrush, rabbitbrush, ceanothus, and other chaparral species. They typically breed on rocky hillsides and winter downslope in desert scrub. Moderate potential to occur on the Property.
Canyon towhee <i>Melospiza fusca</i>	Lives in desert grasslands and rocky and shrubby areas, often along arroyos, mesquite thickets along streams, and suburban settlements. They also occur at higher elevations, particularly in Mexico, where you may find them in desert grasslands, pinyon-juniper woods, and pine-oak forests. High potential to occur on the Property.
Chestnut-collared longspur <i>Calcarius ornatus</i>	Found in shortgrass prairies, rangelands, and desert grasslands. Wintering habitat exists in the eastern part of Arizona. Low potential to occur on the Property in winter, due to a lack of bare ground and suitable grassland habitat.
Common black hawk <i>Buteo anthracinus</i>	Typically found in woodlands near water where it hunts; shows an affinity for cottonwood trees at the northern end of its range. High potential to occur on the Property due to suitable breeding habitat.
Ferruginous hawk <i>Buteo regalis</i>	Addressed as a BLM special status species above.
Golden eagle <i>Aquila chrysaetos</i>	Addressed as a BLM special status species above.
Gray's vireo <i>Vireo vicinior</i>	Found in pinyon-pine/juniper, mesquite scrub, oak scrub, and chaparral habitats. Hot, arid habitats usually have dense brush from near the ground to 6 feet high. Moderate potential to occur on the Property.
Lark bunting <i>Calamospiza melanocorys</i>	Species is endemic to the grasslands and shrubsteppe of North America—they occur nowhere else. When breeding, they are most likely to be found in large areas of native grassland vegetation, especially wheatgrass, blue grama grass, needle-and-thread grass, and big sagebrush. Lark Buntings live among many species of prairie vegetation, including red triple-awn grass, four-winged saltbush, cottonthorn hornbush, and green-plumed rabbitbrush, all plants in which the birds may nest. They avoid bare ground when nesting, preferring shortgrass and taller habitats. They usually nest at the base of a small shrub or cactus, so pure grassland is usually not suitable for breeding habitat. Heavily grazed shortgrass habitats, prairie dog towns, and recently burned fields are not generally used. The Property is within the species' nonbreeding and migration habitat range. Low-to-moderate potential to occur on the Property.
Lucy's warbler <i>Leiothlypis luciae</i>	Most common in dense mesquite woodlands (i.e. bosques) of the southwestern United States, where they can reach up to 5 pairs per acre. These woodlands are most prevalent near streambeds. Lucy's Warblers also breed (in lower densities) in stands of non-native tamarisk. Other common plants of such desert habitats include acacias, hackberries, and elderberries. In drier areas of scrub and grassland, they sometimes nest in stands of willows, arrowweed, paloverde, and ironwood. They also occupy riparian cottonwood-mesquite forests and, at higher elevations, transitional woodlands with ash, walnut, sycamore, and oak. They normally occur below about 3,000 feet elevation, but some inhabit open woodlands of sycamore, alder, and oak up to 5,800 feet in central Arizona. Property is within the species' breeding habitat range. High potential to occur on the Property
Phainopepla <i>Phainopepla nitens</i>	Found mostly in desert washes that have mesquite, acacia, palo verde, smoke tree, and ironwood. They nest in these same desert trees and feed

Migratory Birds and Birds of Conservation Concern	
Species	Comments
	heavily on berries of the desert mistletoe, a parasitic plant of these trees. High potential to occur on the Property due to suitable breeding habitat.
Rufous-winged sparrow <i>Peucaea carpalis</i>	Found in thorn scrub and arid grasslands. This species is uncommon and sparsely distributed across its range. The Property occurs within the very northern end of their year-round habitat range. Low potential to occur on the Property.
Sprague's pipit <i>Anthus spragueii</i>	Most nesting territories are in shortgrass prairies and bare ground. Key grass species in their nesting habitats include blue grama, junegrass, fescues, and various species of wheatgrass (crested, slender, northern, western), along with foxtail barley, Canby blue, speargrasses, salt grass, plains muhly, and threadleaf sedge. They do not nest in cropland and are uncommon or absent in non-native grasslands. On wintering grounds in Mexico and border areas of the southern U.S., they use both native and non-native grasslands with limited shrub cover, including some shortgrass environments, even occasionally athletic fields and heavily grazed pastures. The Property is outside the fringe of their wintering habitat. Rare potential to occur on the Property.
Western burrowing owl <i>Athene cunicularia hypugaea</i>	Flat, open, low-stature grasslands, sparsely vegetated Desertscrub, sagebrush steppe, agricultural lands, and urban developments. Associated with burrowing mammals. Locally uncommon: Property is within their range and has some suitable habitat. Low potential to occur on the Property.
Western yellow-billed cuckoo <i>Coccyzus americanus</i>	Addressed as a T&E species in table above.

Sources: AZGFD Report, retrieved November 20, 2020 (AZGFD N.d.); USFWS Birds of Conservation Concern 2008 (USFWS 2008).

Table F-4: Species of Economic and Recreational Importance

Species of Economic and Recreational Importance	
Common Name	Scientific Name
White-tailed deer	<i>Odocoileus virginianus</i>
Mexicana desert bighorn sheep	<i>Ovis canadensis mexicana</i>
Band-tailed pigeon	<i>Patagioenas fasciata</i>
Gambel's quail	<i>Callipepla squamata</i>
Javelina	<i>Pecari tajacu</i>
Mule deer	<i>Odocoileus hemionus</i>
Mountain lion	<i>Puma concolor</i>
Mourning dove	<i>Zenaida macroura</i>
White-winged dove	<i>Zenaida asiatica</i>
American black bear	<i>Ursus americanus</i>

Source: AZGFD Report, retrieved November 20, 2020 (AZGFD N.d.)

Appendix G: Letters of Support



October 22, 2018

**RE: Support for Proposed BLM and Forest Service Acquisitions
Cross F Ranch, Graham County**

Dear Mr. Suazo and Mr. Dewberry:

The Arizona Game and Fish Department (Department) has an active Public Access Program to identify areas that are challenging for public access to federal and state lands, particularly for sportsmen use. This program recognizes that over four million acres of public lands and State Trust lands in Arizona are not available for public access particularly due to private lands that block strategic access points to lands owned by BLM and the Forest Service. Many of these issues are found in the Sky Island Region of southeastern Arizona and therefore within the Department's Region V boundaries. Once such key access points are identified, our access program is often able to provide funding to acquire access easements that would allow public access across these private lands and provided the landowners are willing sellers.

The Department identified the Aravaipa Canyon and Santa Teresa Mountains as two such important access points. There are currently no good options for the public to access these BLM public lands and access to the Coronado National Forest in the Santa Teresa Mountains is limited. These areas are very scenic with a diverse range of wildlife habitats, and offer important opportunities for hunting and other recreational uses. Access to this area was also identified in the Aravaipa Ecosystem Management Plan, a plan that was completed in 2015 by the BLM with the cooperation of the Department and the Nature Conservancy.

We understand that the BLM and Forest Service may seek Land and Water Conservation Funds to buy the Cross F Ranch, which is strategically located between Aravaipa Canyon and the Santa Teresa Mountains, and would greatly improve public access to these areas. The Department supports such a plan since it could result in sportsmen access to over 20,000 acres of State Trust and public lands that currently have no (or limited) access. The project would also protect wildlife habitat that comprises an important wildlife movement corridor across the landscape for large mammals such as mule deer, white-tailed deer, black bear, desert bighorn sheep and mountain lion. It would also protect a significant part of the watershed for Aravaipa Creek, an extraordinary riparian system that provides habitat for seven native fish, lowland leopard frogs and more than 200 species of birds.

Please contact me if you have any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink that reads "Raul A. Vega".

Raul A. Vega,
Tucson Regional Supervisor

cc: Scott Feldhausen, BLM Gila District Manager
Scott Cooke, BLM Safford Field Office Manager

azgfd.gov | 520.628.5376

TUCSON OFFICE: 555 N. GREASEWOOD ROAD, TUCSON AZ 85745

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN JAMES R. AMMONS, YUMA | JAMES S. ZIELEP, ST. JOHNS | ERIC S. SPARKS, TUCSON
KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN DIRECTOR: T.Y.E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY



October 29, 2018

Raymond Suazo
Arizona State Director
Bureau of Land Management
1 North Central Ave, Suite 800
Phoenix, AZ 85004

Cal Joyner
Regional Forester, Southwestern Region
U.S. Forest Service
333 Broadway SE
Albuquerque, NM 87102

**RE: Support for Proposed BLM and Forest Service Acquisition of
Cross F Ranch, Graham County, Arizona**

Dear Mr. Suazo and Mr. Joyner:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a non-profit organization whose mission is to educate and inform sportsmen, wildlife conservation organizations through the state, and the public at large on important issues related to wildlife and wildlife habitat, and to provide via grants or other sources, funding to conserve Arizona's wildlife populations through habitat enhancement initiatives.

AZSFWC is comprised of 42 Member, Affiliate and Associate organizations that reach across the spectrum of wildlife conservation, hunting, angling, shooting, outdoor recreation groups and business from all across Arizona. Our member organizations represent more than 10,000 sportsmen and women across Arizona.

Among many other initiatives, AZSFWC has been an advocate for the Land and Water Conservation Fund (LWCF) since protection of public lands, particularly for wildlife habitat and recreational access to those lands, is an important issue for many of our members and constituents.

AZSFWC and 26 of our member organizations strongly support the efforts of BLM and the Coronado National Forest to purchase the Cross F Ranch in Graham County with funds through the LWCF. We believe this is critical not only for the habitat, but also for the additional access points to Aravaipa Canyon area and the

AZSFWC letter supporting Cross F acquisition with LWCF funding – 10-29-2018

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087

Santa Teresa Mountains, which is very important to sportsmen and women in Arizona.

A list of our Member groups supporting the effort is attached.

Please let me know if you have any questions!

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht". The signature is stylized and written in a cursive-like font.

Jim Unmacht
Executive Director

Cc: Scott Feldhausen, BLM Gila District Manager
Scott Cook, BLM Safford Field Office Manager
Kerwin Dewberry, Coronado National Forest Supervisor
Ty Gray, Director, Arizona Game and Fish

AZSFWC letter supporting Cross F acquisition with LWCF funding – 10-29-2018

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087



**AZSFWC Member Organizations Supporting the
Cross F Ranch Acquisition with LWCF Funding**

Anglers United
AZ Antelope Foundation
AZ Backcountry Hunters & Anglers
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Chapter National Wild Turkey Federation
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Flycasters Club
AZ Houndsmen
AZ Outdoor Sports
AZ Shooting Sports Education Foundation
AZ Taxidermy Association
Christian Hunters of America
Coconino Sportsmen
Mohave Sportsman Club
Outdoor Experience 4 All
South Eastern AZ Sportsmen Club
SRT Outdoors
The BASS Federation
Theodore Roosevelt Conservation Partnership
Valley of the Sun Quail Forever
Xtreme Predator Callers
1.2.3.Go...

AZSFWC letter supporting Cross F acquisition with LWCF funding – 10-29-2018

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087



RESOLUTION NO. 2018-12

A RESOLUTION OF THE BOARD OF SUPERVISORS OF GRAHAM COUNTY, ARIZONA, SUPPORTING THE PURCHASE OF THE CROSS F RANCH BY THE BUREAU OF LAND MANAGEMENT AND FOREST SERVICE

WHEREAS, the Cross F Ranch is a ranch in Graham County containing 3,200 acres of private lands in addition to grazing leases on public lands owned by BLM and Arizona State Land Department, and the private lands of the ranch control important private roads and access points into the Aravaipa Canyon area (including public lands owned by BLM) and the Santa Teresa Mountains (including public lands owned by the US Forest Service); and

WHEREAS, The Trust for Public Land and The Nature Conservancy are working to acquire the ranch from a willing seller and are contemplating that the ranch's private lands could ultimately be owned as additions to our public lands by the BLM and the Forest Service, and which would include a request for funds from the Land and Water Conservation Fund for those federal agencies to acquire the private lands; and

WHEREAS, Arizona Game and Fish and numerous sportsmen groups believe the ownership of the ranch lands by BLM and Forest Service is an important project for expanding and enhancing the access of hunters and other recreational users to the existing federal public lands; and

WHEREAS, the ranch has been run as an active cattle ranch with low property taxes due to its agricultural status, and the loss of property tax revenues resulting from ownership by the federal government will have a minimal impact on the tax revenues of the County; and

WHEREAS, TPL has told the County that it intends that the ranch lands, including the grazing leases, will stay in active agricultural use upon completion of the project, and therefore remain part of the cattle ranching economy of the County.

WHEREAS, Graham County supports the increased access for the public to public lands for hunting and other outdoor recreational uses, both for the benefit of its own residents and also to support the economic benefits that accrue from visitors to the County who use these public lands.

NOW, THEREFORE, IT IS RESOLVED that the Board of Supervisors of Graham County supports the purchase by BLM and Forest Service of the private lands of the Cross F Ranch and the request by those agencies for Land and Water Conservation Fund monies for that purchase.

PASSED AND ADOPTED at a regular session of the Board of Supervisors of Graham County, Arizona on November 5, 2018.

GRAHAM COUNTY BOARD OF SUPERVISORS


James A. Palmer, Chairman

ATTESTED:


Dustin Welker, Clerk

APPROVED AS TO FORM:


Kenneth A. Angle, County Attorney

October 26, 2018

Raymond Sauzo
Arizona State Director
Bureau of Land Management
One North Central Avenue
Suite 800
Phoenix, AZ 85004

RE: TNC Support for Cross F Ranch Acquisition Project

Dear Raymond,

The Arizona Chapter of The Nature Conservancy works to protect our state's most important lands and waterways – from the Colorado, Verde, and San Pedro Rivers, to the Galiuro Mountains and Aravaipa Canyon. Our work in the Lower San Pedro Basin, and particularly around Aravaipa Canyon, seeks to preserve and protect a rare perennial desert stream, open connected landscapes and key wildlife corridors, while also maintaining agriculture and recreation in this scenic area.

Aravaipa Canyon, and the larger Galiuro-Santa Theresa landscape that it lies within, is the second largest unfragmented landscape in the desert Southwest. At the heart of this area lies Aravaipa Creek and a 17-mile-long perennial-flow stretch that supports what is considered the best remaining assemblage of desert fishes in Arizona. Seven native species can be found in this fishery, including the federally-listed spikedace and loach minnow. Aravaipa Creek is fed by a 537 square mile watershed; contains 27 vegetation communities; includes at least 298 plant, 228 bird, 45 mammal, 10 amphibian, and 57 reptile species; and, is a key tributary to the San Pedro River, the last major free-flowing river in the southwest.

The Conservancy's involvement in this landscape began in 1971 when we purchased the 4,100-acre Panorama Ranch at the west end of Aravaipa Canyon and established the Aravaipa Canyon Preserve. Since that time the preserve has grown to more than 9,000 acres on both the east and west ends of the canyon. The Conservancy's stewardship efforts are focused on maintaining and supporting healthy, functioning native ecosystems, while continuing to allow for recreation and traditional agriculture. Recognizing the multitude of values that lie with the San Pedro River basin, as well as the numerous challenges facing the area, we began a comprehensive conservation planning effort for the basin in 2017 that included Aravaipa Canyon. The result of this effort is a renewed commitment to maintaining unfragmented landscapes and functional habitat connectivity linkages, specifically in the Aravaipa Creek corridor between the Galiuro and Santa Theresa Mountains.

For the past 18 months, we have worked in close coordination with the BLM Safford Field Office, the Arizona Game and Fish Department, the Trust for Public Land, the Coronado National Forest, and others to develop a plan that opens public access across the 3,200-acre Cross F Ranch, protects source water for Aravaipa Creek and increases habitat connectivity through an acquisition funded by the Land and Water Conservation Fund. The ranch sits directly to the north of the Conservancy's Aravaipa Canyon Preserve and connects the BLM-managed Aravaipa Canyon Wilderness to the Forest Service-managed Santa Teresa Mountain Wilderness and is the linchpin to preserving connectivity through this corridor. Additionally, hydrologic studies suggest that

more than 40% of the water in the perennial stretches of Aravaipa Creek originates on the Cross F from the Stowe Gulch Drainage that bisects the property. Finally, public access across the Cross F has been restricted for almost two decades, leaving tens of thousands of acres of public land inaccessible, and concentrating recreation activity in the lower more sensitive areas of the canyon.

The Nature Conservancy of Arizona recognizes the acquisition of the Cross F Ranch as critical for the long-term conservation of Aravaipa Creek and opening access to public lands that are currently inaccessible. The Conservancy strongly supports the nomination of the Cross F Ranch for LWCF and the plan for its acquisition by the Bureau of Land Management. Further, the Conservancy is committed to providing access across our Aravaipa Canyon Preserve from Klondyke Road to the entrance of the Cross F Ranch, should BLM acquire the ranch through an award of Land and Water Conservation Funds.

Please call me at (928) 925-9200, if you have any questions.

Thank you for your consideration,

/original signed/

Heather Reading, Land & Water Protection Director
The Nature Conservancy in Arizona



ARIZONA WILDLIFE FEDERATION
PO Box 51510
Mesa, AZ 85208

October 25 2018

Raymond Suazo
Arizona State Director
Bureau of Land Management
1 North Central Ave, Suite 800 Phoenix,
AZ 85004

Cal Joyner
Regional Forester, Southwestern Region
U.S. Forest Service
333 Broadway SE
Albuquerque, NM 87102

**RE: Support for Proposed Acquisition of Cross F Ranch
Aravaipa Canyon/Santa Teresa Mountains, Arizona**

Dear Mr. Suazo and Mr. Joyner:

The Arizona Wildlife Federation (AWF) is a non-profit organization consisting of about 6,000 members and affiliates who are sportsmen and outdoor enthusiasts dedicated to the present and future well-being of wildlife and wildlife habitat in Arizona.

AWF is aware of and supports a proposed project for BLM and Forest Service to acquire the Cross F Ranch, located between the Galiuro Mountains/Aravaipa Canyon and the Santa Teresa Mountains (much of which is part of the Coronado National Forest). The project would protect private lands from development that lies in a significant wildlife migration corridor and also provides a significant part of the water supply for Aravaipa Creek, one of the most important riparian habitats in Arizona. The project will also open up more than 20,000 acres of public lands for hunting and outdoor recreational uses.

AWF supports this important project and the request of Land and Water Conservation Funds needed for its success. Please call me if you have any questions.

Sincerely,

Brad Powell
President, Arizona Wildlife Federation

Cc: Scott Feldhausen, BLM Gila District Manager
Scott Cook, BLM Safford Field Office Manager
Kerwin Dewberry, Coronado National Forest Supervisor

Appendix H: Summary of Comments and BLM Responses

Commentor	Comment	Response
Public – 1	<p>According to the projects's draft EA, the property includes several active grazing allotments, and there is no plan to change their management - except to adjust the number of cattle permitted on them to reflect the increases in public land acres.</p> <p>The biggest acquisition would be in the Aravaipa allotment, followed by the Aravaipa South allotment. According to the Arizona State Land Department, state grazing lease #05-0025672 is adjacent to this allotment, and it's held by Olympic Communications Inc., so I presume they are the current permittee.</p> <p>From their name, it doesn't appear that they are a cattle ranching company. So, considering this, can you please describe the recent grazing history of the Aravaipa and Aravaipa South allotments? More specifically, are there any cattle on them now, and if so how many actual head grazed the allotments annually in the last 10 years?</p> <p>The acquisition of these lands would obviously be in the public's interest. But they would be an even more valuable public resource if they were excluded from cattle grazing. If there's currently no active grazing on these two allotments, then you should not authorize the reinitiation of grazing on them until you complete another NEPA process to address their suitability for cattle grazing.</p>	<p>Information has been added to section 3.4.1 of the EA to show that all four grazing allotments are currently permitted/leased and are being actively grazed. Current and proposed land status acreage, as well as current and proposed permitted livestock use is shown in section 3.4 of the EA.</p> <p>Both the Aravaipa and the Aravaipa South Allotments are currently permitted/leased to Dry Camp Ranch LLC. Only livestock owned or controlled by Dry Camp Ranch LLC are currently allowed on these grazing allotments. With the proposed acquisition, there would be no change to the permittee/lessee for these allotments.</p> <p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal.</p>
Public – 2	<p>I submitted comments on this project earlier this month, but since then I have learned much that wasn't included in your draft EA, so I am submitting these supplementary comments.</p> <p>Originally, this project also included the acquisition of the 80-acre private base property for the BLM's Dry Camp Ranch grazing allotment, which is located adjacent to the western borders of the Aravaipa & Aravaipa South allotments. The allotment is permitted to the Dry Camp Ranch LLC, owned by Kathy Sergent.</p>	<p>An 80-acre acquisition or any public access easement purchased by Arizona Game & Fish Department, or any other exchange of money associated with these actions is not a part of this EA.</p> <p>Both the Aravaipa and the Aravaipa South Allotments are currently permitted/leased to Dry Camp Ranch LLC. Only livestock owned or controlled by Dry Camp Ranch LLC are currently allowed on these grazing allotments. With the proposed acquisition, there would be no change</p>

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	<p>But this isn't included in the EA. It's my understanding that, instead, the Arizona Game & Fish Department is going to pay Ms. Sergent to purchase a public access easement to the ranch roads located on the BLM lands found beyond the Dry Camp Ranch's base property. Then, she's going to use that money to help pay the Trust for Public Land (TPL) to acquire about 40 acres of the private lands they acquire before they convey the rest of them to the BLM. (Please let know if my understanding is incorrect.) It appears that her purchase is intended to obtain a base property from which she can graze the Aravaipa & Aravaipa South allotments, which will include more public land after the BLM's land acquisition is completed.</p> <p>In your draft EA you explain that, after the land acquisition, you intend to continue to authorize livestock grazing on the Aravaipa & Aravaipa South allotments. But you don't mention the application process that will be used to identify the new permittee for these allotments? Is that because it's been predetermined?</p> <p>Furthermore, your draft EA states that, "With the acquisition of the Property, the above-ground range improvements described above would be acquired by the permittee." Does this mean that the BLM would sell them to the new permittee? Or, do you plan to simply give them away as a gift?</p> <p>Finally, have the Aravaipa & Aravaipa South allotments been assessed for compliance the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration? If so, what were the findings. If not, I suggest that you should complete the assessments before you authorize a new permittee to graze the allotments.</p>	<p>to the permittee/lessee for these allotments. Additionally, acquisition of the property would not result in creation of new grazing allotments, but rather, adjustment to ownership acreage of existing grazing allotments. Current and proposed changes to base property are described in section 3.5.3 of the EA.</p> <p>Section 3.5.3 of the EA describes what would happen with existing range improvements. The BLM would not pay for or acquire the above ground range improvements. Rather, these improvements would be paid for and acquired by the permittee from the seller. Underground improvements such as wells and casings would be acquired by the BLM.</p> <p>Lands associated with the Aravaipa and Aravaipa South Allotments have not yet been assessed for compliance with Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal.</p>
Public – 3	<p>The introduction eludes and makes the statement that approximately 39,000 acres (total sum) is being blocked by ranch road contained in the property. This is not true. The mere 11.7 miles of ranch roads do not extend to the thousands of acres of government land.</p>	<p>Wording has been updated throughout the EA to describe that the Proposed Action would secure legal access in the area.</p> <p>The 39,000 acres includes the contiguous Aravaipa Canyon Wilderness and the Santa Theresa Wilderness, as</p>

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	<p>Of the 11.7 miles on the property, does the BLM plan to grade and maintain these roads? This section fails to explain how 11.7 miles of road provides access to wilderness and other government land. Vehicle travel is limited at best to off road “side by sides” or 4 wheelers and not to normal vehicle travel for the average visitor. Given time, these roads will be closed due to some wildlife or fauna and no access will be given per the endangered species act. The EA states that 5 to 7 species are likely to exist which would call for further limitation or access to these areas. Access to the Aravaipa is already extremely limited from the Nature’s Conservancy and wilderness areas.</p> <p>To base vehicle counts at the confluence of Turkey Creek and the Aravaipa Creek is not a true count. Most vehicle do not even make it that far due to restrictions and rough terrain. Not sure where the numbers came from.....there is not a vehicle counter there.</p> <p>In section 3.2.1 the wording makes it appear there are a 150 miles of primitive roads in and around the property. This simply is not true.</p> <p>The cumulative effects section suggest that the increase traffic would be marginal which is direct conflict of the EA’s promotional stance of increased visitation and open access to thousands of acres. It doesn’t add up. The hunters who use the property now will be the same hunters that will use the property in the future. They have access now!</p> <p>Acquiring the parcels is stated to increase wildlife’s connectivity over time. I simply fail to understand how wildlife now know how to divert around private property and not trespass? Wildlife will do what they will do regardless if the land is private or government.</p>	<p>well as other BLM- and USFS-managed public land surrounding the Property.</p> <p>Access is impacted by the addition of 11.6 miles of previously established routes currently under private ownership and securing legal access to connecting routes previously established on BLM managed lands in the area as well as routes on surrounding lands managed by USFS and the Arizona State Land Department (ASLD).</p> <p>The network of 150 miles referenced in the section refers to the total number of available routes already identified in the Aravaipa North TMA. Wording has been added to this section for clarification.</p> <p>The existing routes that would be acquired through the Proposed Action would be adopted and managed under the Aravaipa North Travel Management Plan. This is explained in Section 3.1.3.</p> <p>Maintenance of the 11.6 miles of routes will be performed in accordance with BLM Manuals 9113 and 9104 at the intensity level 1 (low intensity) for primitive routes. This intensity level is as needed to protect adjacent lands and resource values.</p> <p>Vehicle counts are based on visitor check-in logs in those popular recreation areas. These areas generally receive the highest use, which provides the BLM the best available data for the area. A traffic counter was deployed on March of 2020 and is not obviously visible to the public. Data is pulled from the device every 6 months or as needed. An additional traffic counter was deployed at the start of Rug Road in June of 2020. The additional visitor count data is gathered from the Aravaipa Canyon</p>

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		<p>permit system which tracks all legal accesses into the wilderness.</p> <p>The marginal increase of recreational users will most likely be from general OHV users and vehicle touring/exploring the area as has been the trend throughout public lands. Additional traffic counters are planned to be added to the area to track trends of usage once the acquisition of the parcels is complete.</p> <p>It is expected habitat and thus, connectivity would improve overtime because land ownership would be less checkerboard which allows for more cohesive management on a landscape scale. Further, the ground water resources which support a great deal of wildlife would be secured. The newly established access to the currently inaccessible public parcels would also allow for habitat monitoring and restoration based on on-the-ground observations. It also affords the lands and resources the opportunity to be placed into a management plan in the future. Finally, as summarized in Section 3.3.3, BLM administered land is subject to environmental law and regulation that is more stringent than on private land and requires the involvement of the public, partners, and regulatory agencies.</p>
Public – 4	<p>Only lightly treated, the transfer of most of these mining claims to federal surface ownership will effectively kill any future development of the subsurface minerals. It is much more difficult to bring a mining operation into fruition when no private ground is available. The location of these claims though between two wilderness areas, next to Indian land, and surrounding BLM land make this point mute. The BLM should address in the EA the subject of the abandoned waste heaps and future costs to the tax payer and eventual mine closure costs. The EA punts to the CERCLA process but fails to adequately explain what that</p>	<p>The BLM owns most of the federal mineral estate of the Property, therefore the mining process would not change because of the Proposed Action. Parcels 13-15 have severed mineral rights, and the mineral estate would remain in private ownership and be subject to BLM surface management regulations as split estate lands.</p> <p>A human health risk assessment was completed for anticipated exposures to the mine wastes under expected</p>

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	<p>would entail. I realize from the EA standpoint, its not an issue. But the public should understand the CERCLA implications.</p>	<p>BLM management direction as defined in the current Safford Resource Management Plan. The risk assessment found that human exposure to the mine wastes would not exceed Environmental Protection Agency and Arizona Department of Environmental Quality risk thresholds. The Proposed Action would not modify the use scenario for the acquisition parcels. If future proposed land use decisions were to change uses on these parcels changing human exposures, then BLM would need to initiate a remedial investigation/action under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA regulations provide a process parallel to NEPA, including public involvement, which replaces NEPA analysis for actions taken under CERCLA. Therefore, the analysis of potential hazardous substance releases associated with historical mining activities on the acquisition parcels is deferred to the CERCLA process and is not carried forward in this document. These AML sites would be monitored and managed as needed.</p>
<p>Public – 5</p>	<p>In alternative #1, it states that “no improvements to the property or features would occur”. This implies that no wells, watering tanks, pipelines, roads, fences, etc would be maintained by the BLM. If the ranch continues as an operating ranch, some of these features would be maintained.</p>	<p>Alternative 1, or the Proposed Action, has been adjusted to remove the implication that range improvements would never be maintained.</p> <p>Section 3.5.1 of the EA contains a list of improvements associated with the old homestead on the Property. The structure has been uninhabited for many years. For safety reasons, the house would be removed prior to acquisition by the BLM, other associated structures and improvements are related to the management of livestock and would be permitted for that use as described in Section 3.5.1.</p>
<p>Public – 6</p>	<p>What about historic mining structures and the ranch headquarters? Will these features be removed or will they become subject to the antiquities act and gradually future deteriorate with time?</p>	<p>These structures were not analyzed in the EA because TPL is responsible for their demolition and/or removal prior to the BLM acquisition.</p>

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	<p>The abandoned ranch house and surround area is of particular interest to me as that home goes along way back in my family. I have many fond memories of time spent there where my great-grandfather and great uncles and my grandfather started back in the early 1900's. The original home has since burned down a few years ago. I would hope that the rancher who is acquiring the grazing rights through this transaction of transferring the deeded land to the BLM would be allowed to fix up that home if so desired or allow someone else too. The ultimate disposition is not stated as the home doesn't qualify as a "range improvement" Can the BLM address what will happened to these historic structures on the mining claims and ranch headquarters?</p> <p>What I do not see present as a rebuttal to all the support letters, are letters from Arizona Cattlemen's Association or other groups that are opposed to more government oversight or taking out of circulation private property. Did the BLM seek out these groups and ask for an opinion or just the organizations that favored their long-term goal?</p>	<p>The project was announced in 2018 by Trust for Public Lands. The BLM did not solicit letters of support received in 2018 but were sent the letters in response to the announcement of the LWCF project. The BLM did not receive any letters that were not in favor of the project because the BLM did not solicit comments on the project at that time.</p>
Environmental Workshop Review	<p>Section 3.4.3 of the EA states "The Aravaipa South Allotment would gain 2,440 BLM-administered acres and would change from 168 AUMs to 522 AUMs (based on current use rates for public land AUMs on the allotment) and the corresponding change in number of head permitted would change from 14 cattle-year-long to 43 cattle-year-long." The number of AUMs and head of cattle should <i>not</i> be tripled until a formal evaluation of range condition is completed.</p> <p>BLM has a backlog of permits needing evaluation for renewal, which has been increasing for more than a decade. To allow for continuity in grazing operations, P.L. 113-291 made permanent the automatic renewal (until the evaluation process is complete) of permits and leases that expire or are transferred. However, P.L. 113-291 (Section 3023) does not allow for an increase in AUMs and/or head of cattle, merely for an automatic renewal of the previous lease. Given that those 2,440 acres of private lands will be folded into the existing South Aravaipa allotment, and were undoubtedly used by the owner for grazing, those acres should</p>	<p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal. As described in section 3.4.1, the Property is currently available for livestock grazing, and will continue to be available for livestock grazing. While permitted livestock number on the Aravaipa South Allotment would increase, this is associated with the increase of public forage and will not result in more livestock than currently allowed on the allotment.</p>

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	be formally evaluated before additional AUMs are added to the existing South Aravaipa allotment.	
LSPWA-1	<p>Section 3.1.4 (cumulative effects of vehicular traffic) As emphasized in the Wilderness Act, <i>mechanization</i> is recognized as a significant threat to wilderness values. As required by NEPA, the description of effects in this EA must not be speculative nor unrealistically hopeful about the minimization of future impacts. Also, the BLM must provide more details on abatement of future impacts through management that is appropriate for a wildlife corridor connecting two major Wilderness Areas.</p> <p>a) Data for existing vehicle traffic on roads that would be acquired by the BLM is necessary as a baseline for assessment of potential future cumulative effects. This data collection could start immediately on public lands immediately adjacent to the subject private Property.</p> <p>b) Speculative statements about whether there would be more or less vehicular traffic on the new proposed routes (as compared to existing access routes to Aravaipa Canyon) should be removed from this section. Backcountry traffic patterns are highly influenced by both the nature of vehicular access policies and the degree of monitoring and enforcing these policies. Off-highway traffic in remote areas tends to concentrate along the paths of least regulatory resistance, and the new routes would be aimed directly toward two previously inaccessible portions of federally designated Wilderness Areas. Word about this new access travels quickly and widely on the internet.</p> <p>c) This section or one of the immediately preceding sections needs to include a commitment by the BLM to develop travel management plans for the proposed routes that will specifically address preserving the wilderness characteristics of the two affected Wilderness Areas, including the prohibition of mechanized vehicles within the actual Wilderness Areas, limiting access to the northern part of the Aravaipa Wilderness Area to people who possess one of the 20 daily permits available for access from the east side, the prohibition of any new through “wildcat” roads from the east side of the Aravaipa Wilderness to the west side, appropriate signage and gate installations, and the</p>	<p>The BLM has no intention to add additional motorized routes in the area. The routes in the area are already established and are accessible via permission by private landowners. Based on usage trends in the area, any additional usage in the area is expected to be marginal as the predominate recreational use in that area is seasonal by hunters. In addition, in order to track and mitigate issues in the future the BLM intends to deploy traffic counters in the area of the acquired parcels</p> <p>Usage trends are already being monitored via traffic counters in the greater area where we see the predominate access to the wilderness at Turkey Creek and recreationally by OHV users at Rug Road.</p> <p>Current usage data in the general area shows a relatively stable usage pattern, showing increases and decreases throughout the year in accordance with permit usage in Aravaipa Canyon Wilderness.</p> <p>Recreational traffic plans are already established in the Aravaipa North Travel Management Plan and the additional routes will be assumed under that plan with 11.6 being designated open primitive routes and 0.06 being designated closed. Access across ASLD lands are already restricted by requiring a recreational permit to recreate on.</p> <p>While this action secures legal access to BLM managed lands to the north, mechanical uses are still prohibited within the Wilderness and no new routes are being proposed to increase access at this time.</p>

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	<p>management of traffic numbers adjacent to the Wilderness areas in a manner that is consistent with the requirements of the Wilderness Act.</p> <p>Section 3.2.3 (impacts of increased recreational access) It is speculative and almost certainly incorrect to assume that recreational activity would increase marginally from prior and as yet unmeasured motorized traffic volume along the routes proposed to be acquired. With recent press releases, the word is already out to off-highway-vehicle (OHV) users and hunters about this proposal. The speculative statement should be removed and replaced with a statement about the commitment of the BLM to develop a recreational traffic plan that will not imperil the two Wilderness Areas.</p> <p>Section 3.2.4 (cumulative effects of increased recreation access) This would again depend upon how recreational traffic plans were developed and administered. Please remove the speculative statement of “less than significant effect” and insert language about cumulative effects being dependent upon the BLM and Arizona Game & Fish enforcing a travel plan that is developed appropriately for newly acquired access roads. These roads are positioned between two Wilderness Areas that were previously subjected to fewer fragmentation effects from recreational access by motorized vehicles. Efforts like this require a realistic assessment of impacts, a custom-designed travel plan, cost-effective measures for monitoring and enforcing the travel plan, and collaboration with local conservation interests. We strongly recommend that the Safford Office of the BLM continue to build collaborative relationships in the lower San Pedro watershed with other local organizations that understand the needs and requirements of the two Wilderness Areas located at the top of the Aravaipa sub-watershed.</p>	<p>Lands acquired would be managed under the Safford RMP and the Aravaipa Ecosystem Management Plan.</p>
LSPWA-2	<p>Section 3.3.1 (affected environment of wildlife effects) The last sentence includes a blanket statement of “no effect” on threatened and endangered species, but this determination is made without specifying in the draft EA how the fragmenting impacts of increased vehicular traffic and the potential impacts to water resources on private land conveyed as part of this proposal in Stowe Gulch would be managed to prevent</p>	<p>In compliance with National Environmental Policy Act (NEPA), Endangered Species Act (ESA), Bald and Golden Eagle Protection Act (BGEPA), and the BLM Handbook, the EA includes a Biological Evaluation (BE) (Appendix F.) analyzing the effects of the land acquisition of the 2,802-acre Property on BLM Sensitive,</p>

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	<p>significant effects. The blanket conclusion of “no effect” should be qualified with a commitment for appropriate management of vehicular traffic and for a limit on water resource extraction on private land that is conveyed to the grazing permittee as part of this Property proposal.</p> <p>Section 3.3.3 (effects of the proposed action on wildlife)</p> <p>a) A potential significant increase in vehicle traffic and associated fragmentation is not mentioned, and no commitment is made to control vehicular traffic numbers along the Stowe Gulch wildlife corridor. It is more likely that this increase in vehicular traffic would be the primary impact, not “a slight increase in hunting on the Property”, as stated in this section.</p> <p>b) It is stated that any future projects would be analyzed according to federal environmental law, but there is no analysis in this proposal for the impact of conveying 40 acres of land to the livestock permittee as part of the land transfer deal. An objective analysis of this land transfer would likely conclude that land transfer stipulations need to be developed that will result in water use limits, wildlife-friendly fencing requirements, and other appropriate measures.</p> <p>c) The draft EA does not indicate that endangered species analysis was conducted on the 40 acres of land to be transferred to the livestock permittee. The draft EA indicates that this parcel contains Stowe Gulch, which supplies 40% of the water to Aravaipa Creek. As such, any reduction in flows to Aravaipa Creek could have a significant effect on federally listed species. Impacts to threatened and endangered species from the 40-acre land transfer must be analyzed under the Endangered Species Act (ESA) as part of the “Interrelated/Interdependent actions” analysis. Interrelated/Interdependent actions are typically defined by the “But For” test. The 40-acre land transfer would not occur “But For” the proposed action described in the draft EA.</p> <p>As a result, a Biological Assessment must be prepared that analyzes the impacts to federally listed species from the 40-acre land transfer, including any potential changes to flows in Aravaipa Creek, and that analysis must be included in a revised draft EA.</p>	<p>Migratory Birds, and Threatened and Endangered species. A BE is used to document analyses and Section 7 determinations when a Biological Assessment is not required. A Biological Assessment is not required for this action because a no effect determination was reached for each species potentially found in the project area.</p> <p>In section 3.3.3 the effects to threatened and endangered (T&E) species are summarized by the potential increase of public use on the acquired land. The expected primary result from the Proposed Action would be a slight increase in hunting on the Property, with the associated activities being occasional, highly dispersed, and typically constrained to the fall and winter hunting seasons. BLM-administered land is subject to the regulations of the Endangered Species Act (ESA) and NEPA, and any future projects or developments (including range improvements such as fences) would be analyzed in accordance with those acts, including involvement with the public and our partners and consultation with regulatory agencies.</p> <p>This EA analyzes and discloses the potential environmental effects of the proposal to acquire 2,802 acres of private land by the BLM. Lands not acquired by the BLM are not part of this EA.</p> <p>As stated in section 3.2.3, the Property’s remoteness would be expected to limit the number of recreationists; therefore, recreation activity (vehicular traffic) in the vicinity of the Property would be expected to increase marginally yet remain relatively low. The BLM plans to install traffic counter if land is acquired to analyze visitation trends post-acquisition.</p>

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	<p>d) The last sentence states that the proposed acquisition does not change baseline conditions, but baseline conditions for vehicular traffic have not been measured yet.</p> <p>Section 3.3.4 (cumulative effects on wildlife) This section states that acquiring the Property parcels will “increase connectivity of many habitats and migration corridors”. However, this will be true only if the fragmenting impacts of increased vehicular traffic are controlled with a travel plan that is appropriate for a wildlife corridor connecting two major Wilderness Areas, and if the impacts of water resource extraction are controlled with stipulations on land conveyed to the grazing permittee. Those two major conditions need to be specified in the EA.</p>	<p>The routes associated with the Proposed Action would be managed under the Aravaipa North Travel Management Plan.</p>
LSPWA-3	<p>Section 3.4 (grazing impacts) It is essential to the wildlife corridor highlighted in the title of this EA that natural springs and other natural surface water resources in this wildlife-sensitive region be protected from livestock domination, that all new fencing on the grazing allotments be wildlife friendly, and that reasonable and appropriate conservation easement and water use stipulation terms be applied to private land conveyed to the grazing permittee. These conditions should be specified in the appropriate subsections of Section 3.4.</p>	<p>This land acquisition would allow the BLM to increase the public land acreage and associated habitat features in an important wildlife corridor. As described in section 3.4.1, the Property is currently available for livestock grazing. Continued livestock grazing is associated with both the No Action and Proposed Action Alternatives. Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal. No new construction of infrastructure is proposed for this EA. Additionally, no private land is being conveyed to the grazing permittee from the BLM.</p>
LSPWA-4	<p>Appendix B (table of issues considered)</p> <p>a) Air Quality effects (air-borne dust) will be considered “not impacted” (NI) only if traffic on dirt roads is controlled appropriately. OHV gatherings can have significant impacts.</p> <p>b) Invasive species will be NI only if the increase in vehicles and trailers transporting vehicles from other parts of the Southwest are properly regulated for minimizing the transport of invasive species to this intersection of the two Wilderness Areas.</p>	<p>a-f) The Proposed Action, acquiring land, would not have an impact on these resources. Routes being acquired would be managed under the purview of the Aravaipa North Travel Management Plan.</p> <p>g-h) A change in grazing management or any other additional federal actions would be subject to respective NEPA analyses and decisions. This EA does not analyze</p>

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	<p>c) Noise resources would be NI only if the increase in traffic is controlled to a degree that is appropriate for a wildlife corridor connecting the two Wilderness Areas.</p> <p>d) Soil erosion effects will be NI only if motorized traffic volume on newly acquired roads is managed appropriately for this wildlife corridor that connects two Wilderness Areas and only if measures are taken to prevent the formation of new “wildcat” roads.</p> <p>e) Threatened, Endangered or Candidate Plant or Animal Species are listed in this table as no adverse effect. This will be likely only if the conditions we specified in prior comments are incorporated, particularly the need to protect the wildlife corridor from the excessive fragmentation impacts of vehicular traffic and the need to limit water resource extraction on private land conveyed to the grazing permittee as part of this Property acquisition deal.</p> <p>f) Travel and transportation would be NI only if the BLM develops and enforces a travel plan that minimizes impacts to the portions of both Wilderness Areas. The draft EA emphasizes recreational access without specifying the conditions necessary to protect these two Wilderness Areas.</p> <p>g) Water resources affecting the Aravaipa Wilderness Area will be NI only if private land conveyed to the grazing permittee includes water use stipulations that are appropriate for the critical location of this 40-acre parcel in the headwater region of Aravaipa Wilderness Area.</p> <p>h) There are wetlands and riparian zones in Aravaipa Wilderness Area that could be affected if water resources in the private land conveyed to the grazing permittee are not appropriately limited.</p>	<p>actions on private land because it is not within the project scope.</p>
LSPWA-5	<p>Appendix F1, impact to Threatened and Endangered species Aquatic species in the Aravaipa Wilderness Area could be impacted if there are no reasonable restrictions on water resource extraction on private land conveyed to the grazing permittee and/or if the BLM does not appropriately manage future water resource changes (i.e., potential impacts) associated with Cross F grazing leases.</p> <p>Appendix F2, impact to sensitive species</p>	<p>In compliance with NEPA, ESA, BGEPA, and the BLM Manual 6500, the EA includes a BE (Appendix F) analyzing the effects of the land acquisition of the 2,802-acre Property on BLM Sensitive, Migratory Birds, and Threatened and Endangered species. In section 3.3.3 the effects to T&E species are summarized by the potential increase of public use on the acquired land. BLM administered land is subject to the regulations of the ESA</p>

Commentor	Comment	Response
	<p>Sensitive amphibians, reptiles, and mammals could be impacted if vehicular traffic on the Cross F Property/wildlife corridor is not controlled to an appropriate degree. Sensitive aquatic species could be impacted if water resources are not managed appropriately on private land conveyed to the grazing permittee or if future water resource improvements are not managed appropriately on Cross F grazing leases administered by the BLM.</p>	<p>and NEPA, and any future projects or developments, including range improvements and water resource modification, would be analyzed in accordance with those acts, including public review and Section 7 consultation with the U.S. Fish and Wildlife Service. Management of the springs and associated resources are not within the scope of this analysis. Proper Functioning Condition and other impacts associated to the springs and other actions will be analyzed in their respective processes.</p> <p>As stated in section 3.2.3, the Property’s remoteness would be expected to limit the number of recreationists; therefore, recreation activity (vehicular traffic) in the vicinity of the Property would be expected to increase marginally yet remain relatively low. The BLM plans to install traffic counter if land is acquired to analyze visitation trends post-acquisition.</p>
TNC-1	<p>The LWCF funding application also states that if acquired, the Property would be managed in accordance with the Aravaipa Ecosystem Management Plan (AEMP; BLM 2015). We would like to see that recognized in the Record of Decision, since the more recent Plan provides a stronger rationale for the Proposed Action and clearer guidance for management. The AEMP is at least as relevant to acquisition and management of the Property as the Safford Resource Management Plan (SRMP, 1994), for the following reasons: (1) more than half of the Property –approximately 1800 acres—falls inside the AEMP’s planning boundary; (2) Activities and resource conditions on the Property have direct impacts on the adjacent lands governed by the AEMP, e.g. water and sediment moving downstream along Stowe Gulch Drainage feed directly into Aravaipa Creek; (3) Resources in the Property are much more similar to those described in the AEMP than they are to those described in the much broader SRMP; (4) Three of the grazing allotments discussed in this EA are covered by the AEMP; and (5) perhaps most importantly, the AEMP makes a stronger case for the benefits to be gained from acquisitions such as this.</p>	<p>Language concerning the compliance to the Aravaipa Ecosystem Management Plan has been added to Section 1.5.</p>

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TNC-2	<p><i>Hydrology and overall importance of Stowe Gulch:</i> Stowe Gulch is a tributary to Aravaipa Creek, originating in the Santa Teresa mountains on USFS land, continuing through a rugged canyon on state lands and opening up into the broader Aravaipa valley which is a mixture of state and private lands, as well as lands proposed to be acquired by BLM. For several reasons Stowe Gulch can be considered the most important tributary to Aravaipa Creek. Hydrologic modelling has shown Stowe contributes as much as 48% of the baseflow to Aravaipa Creek (Adar, 1984) making it critical to the many species supported by Aravaipa Creek. Watershed modelling also has shown that the lower Stowe floodplain is one of the most important areas in the Aravaipa watershed for recharge of the aquifer (Norman et al., 2018). In the past 20 years, Stowe has experienced several floods exceeding the “100 year” magnitude.</p> <p>Stowe Gulch has been documented as an important wildlife corridor for many species moving between Aravaipa Creek and the Santa Teresa mountains (Wilbor 2014). BLM will acquire two springs, Stowe Springs and Tule Springs, that provide rare surface flow and riparian habitat for both permanent and migratory species. In dry years these springs may be the only perennial water in the Santa Teresa’s. To correct the record regarding wetlands and riparian areas, we point out an error in Appendix B where it lists “Resource is not present” despite an earlier EA statement that the upper portion of Stowe Gulch creek may be able to support Loach Minnow (page 30). These riparian areas and springs strengthen the rationale for acquiring the Property, and they need to be factored into management decisions for roads, grazing, etc. At a minimum, BLM’s riparian management policies argue for Stowe Springs and vicinity being identified as a sensitive area, with efforts to limit impacts from water diversion infrastructure, vehicle traffic, and livestock. Excluding grazing around Stowe Spring and below would allow for recovery of the canyon’s riparian habitat, through most of this parcel’s bottomland.</p> <p>With the proposed acquisition of Cross F private lands which include Stowe Spring, the BLM has recognized the importance of this watershed</p>	<p>Management of the springs and associated resources are not within the scope of this analysis, as this EA relates to acquiring the land. Proper Functioning Condition and other impacts associated to the springs and other actions will be analyzed in their respective processes.</p> <p>Adjustments have been made to Appendix B regarding wetlands and riparian areas.</p> <p>As described in section 3.4.1, the Property is currently available for livestock grazing, and would continue to be available for livestock grazing. Stowe gulch has been grazed and would continue to be available for grazing under the Proposed Action. The BLM would manage these lands in accordance with Title 43 of the Code of Federal Regulations (CFR). If use rates exceed allowable use and will result in resource damages, then standard compliance inspections allow for potential resource damage to be noted and acted upon in accordance with Title 43 CFR § 4110.3-3.</p> <p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until the future assessment of these spring water sources, and renewal, are completed.</p>

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	<p>to the sustainability of surface flows in Aravaipa Creek through the wilderness area. Under the Proposed Action, BLM will now manage the spring water source and associated riparian habitat downstream in Stowe Gulch and should encourage management of the Arizona State Trust lands and private lands to encourage Proper Functioning Condition and aquifer recharge from spring flow and stormwater runoff.</p>	
TNC-3	<p><i>Access and Roads:</i> With the EA’s emphasis on how many road miles and backcountry acres will be made accessible by the proposed acquisition, it is difficult to understand the conclusion in Appendix B that “there would be no direct, indirect, or cumulative impacts” in regard to roads and transportation. We have three concerns over road issues in the EA, each of which could be mitigated by BLM in ways we suggest below, with help from partners.</p> <p><i>Proactive road repairs:</i> Firstly, we see significant evidence of run-off related erosion on the existing roads across the Aravaipa North TMA. Erosion trouble spots cause resource damage by increasing sedimentation problems in downstream channels; triggering road users to cut routes around gully areas; and pulling both soil and water away from adjacent vegetation. Erosion from roads in turn makes those same roads more difficult and expensive to maintain. Re-opening motorized access to roughly 150 miles of unimproved roads will undoubtedly increase erosion and lead to increased sedimentation in Aravaipa Creek, which would affect two endangered fish species, spike dace and loach minnow. These impacts could be mitigated proactively implementing a road maintenance program that identifies, prioritizes, and fixes road-related erosion problems using methods that help roads “lie easy on the land” (Zeedyk, 2006), and considers both ecological health and user needs. In many places, maintenance changes (e.g. adding more frequent water bars and harvesting runoff more effectively) are sufficient. In other places, problem segments may need to be closed or re-routed (e.g. road segments affecting riparian areas, crossing unstable soils). The 2010 joint BLM-TNC road repair project on the Cobra Ranch segment of FR277 is a good example. We prioritized this segment because of</p>	<p>Under the Aravaipa North TMA the routes in the area including the routes to be acquired predominantly fall under the primitive maintenance intensity level 1 which is as needed maintenance. This would include maintenance to protect adjacent lands and resource values. This maintenance level would encompass repairing trouble spots due to erosion to protect the Aravaipa watershed.</p> <p>This action does not change the designations to any routes and only secures legal access to approximately 11.7 miles being added from this action.</p> <p>The network of approximately 150 miles of BLM-managed trails referenced are already open and managed through the Aravaipa North Travel Management Plan. There is no intent to develop or improve current routes and for routes to be maintained as previously stated in accordance with the Aravaipa Ecosystem Management Plan (AEMP).</p> <p>Recreational usage is already being monitored in the Turkey Creek area and Rug Road. In addition, the BLM intends to deploy additional traffic counters to monitor usage to the acquired parcels once the land is under BLM management. This will provide the BLM with actionable data to alter use patterns if needed.</p>

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	<p>frequent flood-related washouts that made the road impassable and dumped sediment into Stowe Gulch and then into Aravaipa Creek. Working with BLM heavy equipment operators, natural resource staff, and a restoration consultant, that road segment was re-contoured to include more water bars and deeper runoff capture basins. These repairs improved road function, eliminated the need for re-grading for several years (a cost savings of many thousands of dollars), and improved water quality in the channel. Eventually a 5,000 CFS flood in 2018 partially washed out these improvements, demonstrating that a full fix of this road's problems would require floodplain restoration on the Cross F property.</p> <p><i>Problematic road spurs:</i> Lastly, there are two short dead-end or redundant road segments shown in the EA as Open for Public Use, that should be eliminated as motorized travel routes. These are best seen in Figure 3 (p. 26). Both are shorter on the ground than EA maps show, and would bring more harm than benefit if managed as mapped. Neither is included in the AEMP /Aravaipa North Travel Management Plan, nor do they connect with BLM roads in the AEMP. To meet the intent of LWCF funding, and to match BLM best practices, these short segments should be removed from the transportation network. Designating them as Closed or Limited and treating them instead as part of a restoration effort would improve conditions on nearby roads, in sensitive ecosystems, and on adjacent grazing lands. These are:</p> <p>(1) The spur road at the southern entrance to the Cross F following an unnamed wash to the northeast toward the Laurel Canyon allotment (AC119, shown as C843 on map above) contributes a large amount of sediment into Stowe Gulch and ultimately Aravaipa Creek. Sediment from this spur road effectively diverts Stowe Gulch onto the main Aravaipa Town road, causing numerous erosion and infiltration problems, and compromising the more important road. Closing this road segment would result in little to no loss of recreational access to public land. EA maps show this road looping northeast and connecting with the Aravaipa Town Road; in reality, this road peters out before crossing into</p>	<p>As for the two routes in question, they are already currently used mostly for grazing allotment management and maintenance. These routes would be added and adopted into the Aravaipa North TMA and Travel Management Plan.</p>

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	<p>the Laurel Canyon Allotment. We recommend this road be officially closed and the area restored to proper functioning condition.</p> <p>(2) The road splitting from FS277 and traveling up Stowe Gulch (AC1118, shown as C845 above) ends at an abandoned homestead at the south edge of the largest Property block visible on p. 26; BLM documents ought to recognize this as the road end. Fig. 3, however, shows it as an open public road continuing up Stowe streambed for another half mile. This extension does not exist as a passable road on the ground. The harms of creating a road here would far outweigh any access benefits, especially since such an extension would be in the floodplain and riparian area the whole way, and since Stowe Spring at the North edge of this parcel is accessible via FS277.</p> <p>From a process standpoint, identifying individual roads is not the same as analyzing effects of the agency's decisions about how to manage whole road and trail networks. Designating routes as open or closed is one small piece of Agency requirements that include choosing maintenance levels, specifying acceptable levels of impacts, agreeing on standards for use and enforcement, and devising strategies to making road networks more compatible with other uses and protection of other resources. A more thorough and up-to-date analysis needs to be done of what roads exist on the ground and in what condition, and how management of the whole network can be optimized such that increased use does not harm other resources or compromise public safety. If done at a broad scale, such an analysis would show that the Safford District has many opportunities for hunting and OHV recreation, while Aravaipa Creek provides the best and one of the few remaining habitats for spike dace and loach minnow anywhere, and hosts some of the best quiet recreation opportunities in the State.</p>	
TNC-4	<p><i>Mining:</i> Land and Water Conservation Fund (LWCF) investments are meant to secure public access, improve recreational opportunities, and preserve ecosystem benefits for local communities. In consideration of both the purpose of LWCF and the stand-out recreational and ecological values of the Property, TNC believes the proposed acquisition should <i>reduce</i> the threat of extractive uses such as mining, and not encourage or</p>	<p>The BLM operates under a multi-use mission and mining is an authorized use unless deemed otherwise. There are only certain authorities that allow the BLM to withdrawal lands from new mineral entry, location, sale, or leasing under the mining laws, which include Wilderness designation, resource management plan amendment, or Notice of Realty Action land segregation.</p>

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	<p>expedite further mining in this location. While this action will result in the federal government consolidating surface ownership over federal mineral estate, further mineral exploration and mining development would result in degradation of the very conservation and recreation values that enabled this acquisition through LWCF. Instead, we encourage BLM to work with partners to pursue mining withdrawals on the Property and across areas such as Stowe Gulch that have recognized significance to the broader Aravaipa Ecosystem, as described also in the AEMP.</p>	
TNC-5	<p><i>Grazing:</i> Our understanding is that in a process such as this one, decisions are typically made first on acquiring a property, followed by more detailed analyses to inform grazing permit decisions. We presume BLM will make these later grazing decisions via a standard Grazing Permit Authorization process and development of a ranch Coordinated Resource management Plan (CRMP). When done well, Land Health Assessments and CRMPs increase confidence by permittees and other stakeholders that elements like rotation schedules, enclosure areas, stocking rates, and drought contingencies match conditions on the ground, and that opportunities to improve land health and ranch profitability are science based and properly vetted. The EA hints at such a process on page 20 in Appendix B: Table of Issues Considered, where it states “Later NEPA will be done to analyze the authorization of grazing on the BLM managed acres within the allotment.” The effects of grazing in the Stowe watershed have never been evaluated to BLM Standards and Guidelines. With effects on BLM resources on the Property and downstream areas, management of the Aravaipa South Allotment will become BLM responsibility and decisions about federal portions of it should not be deferred to the State Land Department. “Custodial allotments” imply that resources in the area cannot be improved; we see significant opportunities here to improve resource conditions in ways that benefit permittees, recreationists, wildlife, and watersheds.</p>	<p>Management of the springs and associated resources are not within the scope of this analysis. Proper Functioning Condition and other impacts associated to the springs and other actions will be analyzed in their respective processes.</p> <p>As described in section 3.4.1, the Property is currently available for livestock grazing, and would continue to be available for livestock grazing. Stowe gulch has been grazed and would continue to be available for grazing under the Proposed Action. If use rates exceed allowable use and will result in resource damages, then standard compliance inspections allow for potential resource damage to be noted and acted upon in accordance with Title 43 CFR § 4110.3-3.</p> <p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until the future assessment of these spring water sources, and renewal, are completed.</p> <p>Information has been added to section 3.4.3 of the EA to show that the proposed adjustments to permitted AUMs use existing summary sheets for each allotment.</p>

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	<p>Proposals to change AUMs based on simple acreage calculations would be premature. There is no way to accurately calculate AUMs without looking at forage conditions on the ground and accounting for features like wash bottoms and steep slopes without accessible forage, and riparian areas with special management needs. Further grazing analyses should consider a range of enclosure and animal management options on the newly acquired lands within the watershed in order to meet wildlife needs, allow recovery of riparian habitats to Proper Functioning Condition, and improve infiltration into the Aravaipa aquifer, with special attention to the Stowe Springs and Tule Springs riparian areas in the South Aravaipa Allotment.</p> <p>Clarifying this process for grazing decisions will help BLM solidify support for this Proposed Action and subsequent analyses.</p>	<p>Allowable use varies by allotment and is averaged over the landscape. These averages are considered appropriate use estimates. Future changes, if needed, will be analyzed in their respective processes.</p>
WWP-1	<p>After TPL purchases this Property, a small portion will be sold back to the current property owner and then this current property owner will be paid by the Arizona Game and Fish Department to finally allow access through their property to those public lands via an easement. EA at 1.</p>	<p>This information is not included in the EA because this EA analyzes the impacts associated with the land acquisition concerning the BLM.</p>
WWP-2	<p>BLM scoped this project in June 2020, but WWP does not recall getting any notice. EA at 4. The letters of support for the land exchange are dated 2018, so some agencies, individuals, and organizations have had advance notice while others, who are likely interested parties, were not informed for more than six months after the project was apparently scoped.</p> <p>Did the BLM solicit these letters of support? If so, how? Did the BLM contact any conservation organizations other than sportsmen’s groups or interested land acquisition groups? Was there any tribal consultation? Did the BLM receive any letters in opposition to the proposed land exchange? The BLM declined to analyze the impacts of this land acquisition on human health and safety, stating simply that there would be no effect. EA at 18. However, and as we discuss above, to reach this “no effect” conclusion the BLM had to ignore their own analysis that the acquisition would increase recreational access and recreational uses. This would put more people into contact with livestock grazing in the</p>	<p>Wording has been corrected in the EA to indicate that internal scoping within the SFO interdisciplinary team occurred in June 2020.</p> <p>The project was announced in 2018 by Trust for Public Lands. The BLM did not solicit letters of support received in 2018 but were sent letters in response to the announcement of the LWCF project.</p> <p>Asserting that increased recreational activity will impact human health and safety is speculative because there is no quantifiable data to support this claim.</p>

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	four allotments in a very remote location, which would increase the risks to human health and safety. This issue should have been more accurately considered and analyzed.	
WWP-3	We are curious why no alternative that proposed constructing a route around the private parcels was included?	This alternative was not considered because it does not pertain to the scope or fit the purpose and need of this EA. <i>See</i> section 1.2 of the EA.
WWP-4	<p>Despite the fact that the BLM identified wilderness as an issue to be considered (Issue 1), the EA fails to adequately address impacts to designated wilderness areas from the anticipated increased recreational and livestock grazing access. The EA seems to indicate that the acquisition of the property will increase visitor access, but because the area that will be newly accessible is not popular, that increased visitor use will be “lower” than nearby areas.</p> <p>This analysis does not account for the increasing pressure on remote public lands as urban areas and urban public lands become more crowded. It also does not account for the possible increase in visitor uses as people discover this newly accessible area. These oversights should be corrected.</p> <p>In the analysis of impacts, especially for the No Action alternative, the BLM assumes that all access is via a motorized route that traverses the private property and ignores the possibility of recreational users hiking, backpacking, or mountain biking around the private property where public access to public lands is being impeded. When the BLM uses the word “access” in this EA it really means “motorized access” and this fact should be clarified. The BLM would be well advised to also analyze impacts to, and from, non-motorized access. We also strongly recommend the BLM address their failure to analyze how increased motorized access to the area will increase off-road vehicle use (OHV or ORV) and how this will impact the watershed, wildlife, and native plants.</p> <p>The EA does not address increased motorized access to Aravaipa Creek. Please conduct and include this analysis.</p>	<p>It is unlikely to see more than marginally increased pressure as the predominate use of OHV users in that area are from the local area including the Safford Micropolitan Area. Usage patterns into the Aravaipa Canyon Wilderness have seen a moderate increase year by year but are capped due to the permit system. Traffic counters have been deployed at Turkey Creek and Rug Road, where there has not been significant increases of use year over year, but the highest use is over the weekend (Saturday and Sunday) which suggests a predominately local user base outside of the users accessing the Aravaipa Canyon Wilderness. This would lead to a preexisting user group that already recreates in the general area on a regular or semi-regular basis with a daily average around 5-6 vehicles (can include mountain bikes but is not separated out) and encompasses users that are accessing the Aravaipa Canyon Wilderness on a permit.</p> <p>Non-motorized uses would be relatively unaffected under the Proposed Action Alternative as they are not restricted under current plans on BLM managed lands directly adjacent to the acquisition parcels.</p> <p>This action does not provide additional access to Aravaipa Creek as all of the acquisition parcels are to the north.</p>

Commentor	Comment	Response
WWP-5	<p>We noticed that in this part of the EA the BLM discusses the impacts to wildlife species (3.3) from increased recreation and hunting, as well as the positive benefits from acquiring the habitat and increasing BLM managed connected lands. EA at 9. However, BLM does not address the impacts associated with livestock grazing – either current or anticipated – from the Proposed Action. The BLM similarly ignores the impacts of livestock grazing in the cumulative impacts section of the analysis to species. This is a significant oversight that must be corrected before the BLM can proceed to a Finding of No Significant Impact. This analysis is especially important because it is well known that BLM is planning to provide the current property owner with grazing privileges on the newly acquired lands, regardless of whether or not other uses are more appropriate, or whether other permittees or lessees may be interested in this allotment.</p> <p>Given that the EA for this project is explicit that there will be no actual changes to the use of the acquired land (it will still be used for livestock grazing and fences will remain in place), it is unclear how this acquisition will improve wildlife corridors. Please explain.</p> <p>It is clear that the public will theoretically no longer be excluded from accessing the public lands that have thus far been behind the locked gates of the current landowner and this will result in increased human presence and access to over 30,000 acres of BLM managed lands. But it is not clear how this improves the habitat for wildlife. Please explain</p>	<p>Impacts of the Proposed Action on the grazing permit/lease or range improvements are described in sections 3.4 and 3.5 of the EA. Impacts of the Proposed Action are compared to impacts of the No Action Alternative. Because equal livestock grazing is considered for both alternatives, this comparison resulted in the statement of impacts being less than significant.</p> <p>This land acquisition would allow the BLM to increase the public land acreage and associated habitat features in an important wildlife corridor. It is anticipated habitat and thus, connectivity will improve over time because land ownership will be less checkerboard which allows for more cohesive management on a landscape scale. It also affords the lands and resources the opportunity to be placed into a management plan in the future. Finally, as summarized in Section 3.3.3, BLM administered land is subject to environmental law and regulation that is more stringent than on private land and requires the involvement of the public, partners, and regulatory agencies.</p>
WWP-6	<p>The BLM <i>does</i> analyze how the Proposed Action will impact the grazing permittees/lessees (3.4), but not in a forthright way. The BLM acknowledges that the property is within four BLM grazing allotment boundaries: Aravaipa and Aravaipa South are included in the majority of the property to be acquired, and both of which are currently leased or permitted to the Cross F Ranch. EA at 10. The BLM states that these two allotments “comprise the Cross F Ranch” which is not correct – the Cross F Ranch has permits or leases for the use of these allotments. The two other allotments that also overlap with the Property include the South Rim and Laurel Canyon allotments. EA at 10.</p>	<p>The statement regarding what allotments comprise the Cross F Ranch is correct. Both the Aravaipa and the Aravaipa South Allotments are currently permitted/leased to Dry Camp Ranch LLC. The area of land associated with these two allotments is often called Cross F Ranch.</p> <p>Asserting that increased recreational activity will impact human health and safety is speculative because there is no quantifiable data to support this claim.</p>

Commentor	Comment	Response
	<p>The EA indicates the Aravaipa allotment and Aravaipa South allotments would see increased AUMs. Why didn't the BLM analyze how the anticipated increase in recreational access and use would possibly conflict with livestock grazing, or how the increase in AUMs would conflict with the increased recreational uses? Why didn't the BLM require a reduction in the number of AUMs to reduce livestock-recreational user conflicts? Why is there an assumption that livestock grazing would be permitted on the private property that is to be acquired and publicly managed? Why is there an assumption that livestock grazing will continue to be the primary use of these areas when it is highly likely that increased recreational use will occur?</p> <p>Was the Property to be acquired used as a base property for the livestock lease or permit on any of the four allotments that overlap with the Property? If so, the lease or permit is no longer valid and the BLM should not assume that livestock grazing can continue as authorized previously. Similarly, if the water rights are used as the base property and those water rights are transferred to BLM, by what authority will the new permittee or lessee obtain the permit or lease? Why would one nearby permittee or lessee have any priority over the existing permittee or lessee? Is there another possible base property owner? Why has the BLM assumed that the permittee or lessee that currently uses the Aravaipa allotment would continue to be the appropriate, legally authorized permittee or lessee?</p> <p>The information in the EA that addresses the base property issue is confusing and appears incomplete: "The base property for the Aravaipa South allotment is land-based and includes associated with the Property." To what property would the base property change to and why is this new base property an applicable base property per 43 CFR 4110.2-1?</p> <p>Range "improvements" are more accurately described as livestock or range infrastructure. There is little evidence that range infrastructure</p>	<p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal. As described in section 3.4.1, the Property is currently available for livestock grazing, and will continue to be available for livestock grazing.</p> <p>Base property is addressed in the EA in section 3.5.3 of the EA. The sentence identified in the EA regarding base property identified has been corrected. Base waters will remain the same for the Aravaipa Allotment, and base land will change for the Aravaipa South Allotment in accordance with 43 CFR 4110.2-1. The current permit/lease holder for these allotments will continue to have control of the base property and would therefore maintain the current permit/lease.</p> <p>Use of the term "range improvement", is an appropriate term for rangeland infrastructure. According to The Public Rangelands Improvement Act of 1978 (43 U.S.C. 1901 et seq.), the term "range improvement" means any activity or program on or relating to rangelands which is designed to improve production of forage; change vegetative composition; control patterns of use; provide water; stabilize soil and water conditions; and provide habitat for livestock and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical means to accomplish the desired results." The term "range infrastructure" and "range improvements" are considered synonymous.</p> <p>The purpose of this EA is not to analyze past or future impacts of existing range improvements, but rather, is to</p>

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	<p>“improve” the watershed and there exists evidence that range infrastructure has significant, negative, long-term impacts. The BLM failed to analyze these impacts in the EA in terms of how acquisition of a large number of tanks, wells, sheds, cattleguards, corrals, “developed springs,” pumps, troughs, pipelines, and fences would impact, or have already impacted, these to-be-acquired lands. The analysis of the impacts of this range infrastructure has never been completed because this infrastructure was initially constructed or installed on private lands. Now is the time the BLM must actually analyze the impacts of this infrastructure, before acquiring these liabilities.</p> <p>For example, how have and how will the wells impact ground water and nearby spring flow? How do cattleguards impact wildlife and water surface flow? Are there escape ramps or structures in the cattleguards to allow small reptiles or mammals to escape if they fall into the cattleguard? How have and how will the sheds and corrals impact the visual quality of the area and is this in keeping with the RMP for the nearby areas? How will the tanks impact surface flow (and sheet and rill erosion) and how will this impact areas down grade from the tanks? How will maintenance of all of this infrastructure impact wildlife and native plants? Will roads need to be maintained more or less often? How will this impact recreational users? How do the fences impact wildlife movement?</p> <p>For this EA the BLM provided absolutely no analysis of the impacts of this to-be-acquired range infrastructure. If not now, when will the impacts of these structures, wells, massive dirt berms, and fencing be analyzed?</p>	<p>analyze impacts of land acquisition. Impacts associated with the Proposed Action are compared against the No Action alternative, and range infrastructure would be present in either alternative.</p>
WWP-7	<p>The BLM’s Field Manager for the Safford Field Office assured WWP that the EA for this land acquisition would only address the acquisition of land. <i>See</i> email dated 2.10.21 from Scott Cooke below. However, the EA makes clear that livestock grazing will continue, the current permittees/lessees will continue to use the allotments they are currently using, and little if anything will change on the ground, especially as to livestock grazing authorizations. This seems predecisional and</p>	<p>Information has been added to section 3.4.3 of the EA to show that continued grazing on the Property would be allowed through Title 43 of the Code of Federal Regulations (CFR) 4110.1-1. Existing grazing use on the Property would be honored until future assessment and renewal. As described in section 3.4.1, the Property is currently available for livestock grazing, and will</p>

Commentor	Comment	Response
	<p>inappropriate, especially given the changes to base property/water that will result from the land acquisition and the inclusion of newly acquired lands into the grazing system.</p>	<p>continue to be available for livestock grazing. While permitted livestock number on the Aravaipa South Allotment would increase, this is associated with the increase of public forage because of the increased acreage of public land and will not result in more livestock than currently allowed on the allotment.</p>
<p>WWP-8</p>	<p>How much money will Kathy Sergent receive for allowing an easement across their property?</p> <p>How much money will be spent to acquire the Cross F Ranch property?</p> <p>Information we have acquired indicates the following, which we would expect to see in the EA: the Trust for Public Land (TPL) is going to purchase approximately 3,164.9 acres from Olympic Communications for \$2.6 million dollars; then TPL will convey (perhaps sell) approximately 40.49 acres to Kathy Sergent prior to conveying the newly acquired lands to the BLM and Forest Service with funds (\$90,000) that Kathy Sergent will require Arizona Game and Fish Department (AZGFD) to pay for an easement to cross her currently owned lands for public use and BLM hopes or believes that AZGFD will then assign this easement to BLM to provide for full public access. Is this accurate?</p> <p>If this information is accurate, is the easement Kathy Sergent is selling to AZGFD required for the public to be able to access the Property that is the subject of this EA? If yes, has this easement been sold and/or assigned to the BLM? What happens if this easement deal falls through?</p> <p>Why is BLM not acquiring those 40.49 acres? Is it so Kathy Sergent can retain base property for a grazing lease that could otherwise be retired or acquired by another party? Is it so Ms. Sergent can sell the easement?</p> <p>It is WWP's understanding that the 40.49 acres is located within the floodplain of the severely degraded Stowe Gulch. This area is extremely important to Aravaipa Creek and ecosystem as it provides over 40</p>	<p>Please refer to Section 1.2 of the EA for the purpose and need of this project. This EA analyzes the impacts associated with the land acquisition concerning the BLM. An economic analysis of parcels outside of the project area is beyond the scope of this EA.</p> <p>The easement in question is not associated with the lands being acquired, therefore it is not analyzed in this EA.</p> <p>It is the BLM's understanding that there are discussions between private party has agreed to deed restrictions with TPL. Any actions taken on private land are not within the scope of this EA.</p> <p>All lands that are acquired by the BLM are sold and purchased at fair market value. The cost analysis for this project was not added to the project because the BLM is not directing funds to the land acquisition. The Lands and Water Conservation Fund, a program designated by Congress, will award the funds estimated at \$2.6 million. For more information about the LWCF, please see: https://www.doi.gov/lwcf/about</p> <p>This transaction is separate from the acquisition of the Cross F Ranch; it is between TPL and private party, and the BLM remains as a benefactor of the acquisition.</p>

Commentor	Comment	Response
	<p>percent of the base flow to Aravaipa Creek. What would happen, for example, if the landowner builds a house in the floodplain, which would require levees to protect from flooding? It would also require the installation of wells that would tap into the groundwater in Stowe Gulch, disrupting the baseflows and recharge to the Aravaipa Creek watershed. We believe the BLM is aware of this proposed and likely chain of events, yet it has not included this information in the EA, rendering the analysis incomplete and inaccurate.</p> <p>What is the value of the 40.49 acres that TPL will convey to Ms. Sergent? Why is BLM not pursuing this parcel from TPL? It seems very odd for TPL to acquire the entire parcel and then split it up in such an interesting (geographically) way. Why is TPL not selling this entire parcel directly to AZGFD or to BLM?</p> <p>We note that there was no financial information included in the EA for this property acquisition. The lack of information makes it difficult for the public to determine the wisdom of this land acquisition or comment upon it.</p>	
WWP-9	<p>Is the BLM planning to authorize livestock grazing to the owners of the Muleshoe Ranch, who also hold state grazing lease #05-088461 and the BLM permit or lease for the South Rim allotment? Is the South Rim allotment currently being grazed? Has The Nature Conservancy been considered as a possible allotment permittee/lessee or for the purchase of the 40.49 acre parcel? If not, why not? This information is necessary for a complete understanding of the cumulative impacts of this land acquisition.</p>	<p>Both the Aravaipa and the Aravaipa South Allotments are currently permitted/leased to Dry Camp Ranch LLC. Only livestock owned or controlled by Dry Camp Ranch LLC are currently allowed on these grazing allotments. With the proposed acquisition, there would be no change to the permittee/lessee for these allotments.</p> <p>This EA analyzes and discloses the potential environmental effects of the proposal to acquire 2,802 acres of private land by the BLM. Lands not acquired by the BLM are not part of this EA. This transaction in question is separate from the acquisition of the Cross F Ranch; it is between TPL and private party, and the BLM remains as a benefactor of the acquisition</p>