

U.S. Department of the Interior Bureau of Land Management

Arizona State Office

December 1994



FINAL

Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement



The Bureau of Land Management is responsible for the balanced management of the public lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield; a combination of uses that take into account the long term needs of future generations for renewable and nonrenewable resources. These resources include recreation, range, timber, minerals, watershed, fish and wildlife, wilderness and natural, scenic, scientific and cultural values.

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Arizona State Office 3707 N. 7th Street P.O. Box 16563 Phoenix, Arizona 85011



IN REPLY REFER TO: 1790/8351 (931)

Dear Reader:

Enclosed for your review is a copy of the final Arizona Wild and Scenic Rivers Legislative Environmental Impact Statement. After a public review period, which will incorporate and be concurrent with the 30-day waiting period required by the Council on Environmental Quality (40 CFR 1506.10(2)), this environmental impact statement will be sent to the Secretary of the Interior. With the Secretary and the President's approval, it then will be forwarded to Congress where it will become a component in the decision making process which Congress will use in selecting river segments for inclusion in the National Wild and Scenic Rivers System.

The review period will be in effect until January 31, 1995. Comments should be sent to the Bureau of Land Management at the address listed below.

Copies of the comments will be forwarded to Congress along with the final legislative environmental impact statement. Copies of the comments will be maintained in the Bureau of Land Management Arizona State Office for 60 days after the close of the review period. This record will be available for public review.

Please send comments to:

Phillip Moreland, Branch Chief
Planning, Environmental, Lands and Recreation (931)
Arizona State Office
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3707 North 7th Street
P.O. Box 16563
Phoenix, Arizona 85011

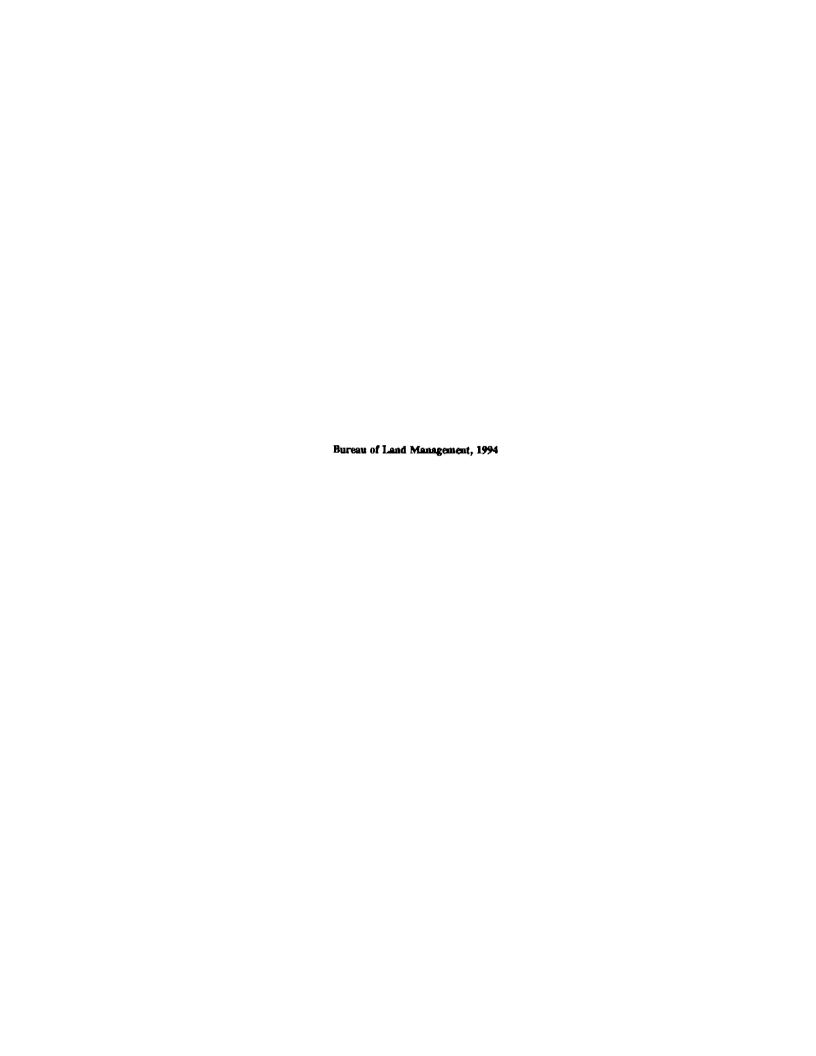
Sincerely,

Herman L. Kast

Deputy State Director

Lands and Renewable Resources

Enclosure



ARIZONA WILD AND SCENIC RIVERS FINAL LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

Draft () Final (X)

The United States Department of the Interior, Bureau of Land Management

- Type of Action: Administrative (); Legislative (X)
- 2. Abstract: The document analyzes the environmental impacts of implementing four alternatives including a recommended alternative and no action alternative that determine the suitability of 20 Arizona rivers and recommend suitable rivers areas to Congress for designation in the National Wild and Scenic Rivers System. An appendix contains 20 river-specific environmental impact statements analyzing the environmental consequences of a recommended alternative for designation and appropriate options.
- Approximately 2,000 copies of the draft document were distributed for a 90-day public review and comment period, announced in the Federal Register, that extended from April 8 to July 8, 1994. Five public hearings were held during the review and comment period.

Chapter 5 includes a list of agencies, groups, and individuals to whom the document was sent and contains copies of the transcripts from the public hearings and of the letters received on the draft document along with responses from Bureau of Land Management personnel.

4. Responsible official:

Lester K. Rosenkrance State Director

5. For further information contact:

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6. Draft filed with the Environmental Protection Agency: April 8, 1994
Final filed with the Environmental Protection Agency: December 15, 1994 (Est)

Recommended:

Lester K. Rosenkrance

State Director

ARIZONA WILD AND SCENIC RIVERS

FINAL

LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

DECEMBER, 1994

Bureau of Land Management, 1994

FOREWORD

INTRODUCTION

In developing resource management plans for public lands over which it has management responsibilities, the Bureau of Land Management in Arizona began considering wild and scenic river classifications as early as 1985.

By 1992, 15 river areas including 16 rivers (the Gila Box area, discussed in the Safford District Resource Management Plan, included the Gila and Lower San Francisco Rivers) associated with Bureau of Land Management administered public land had been found eligible for further wild and scenic study. Seven of river areas were discussed in the Safford District Resource Management Plan (1993). Two river areas were evaluated in the Arizona Strip District Resource Management Plan (1991) and six were assessed in the Kingman Resource Management Plan (1993).

In 1993 four other river areas were evaluated in amendments to the Yuma District, Phoenix Resource Area, and Safford District Resource Management Plans.

Following the public, other agency, and internal review of the draft legislative environmental impact statement, the State Director modified the proposed action by incorporating the all suitable option for Clenega Creek into the recommended alternative. Thus, the recommended alternative analyzed in the final environmental impact statement includes 14 river study areas. Where appropriate, the changes in the relevant acreage and mileage totals have been incorporated into this document.

ORGANIZATION OF THE LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

Chapter 1 (Introduction)

Chapter 1 initiates the environmental Impact statement. It includes a statement of the

purpose and need for the action. This is followed with a description of which Arizona Bureau of Land Management offices administer public lands through which the subject rivers flow. A section on interrelationships itemizes the major types of land use plans (resource management plans, wilderness areas, areas of critical environmental concern, and riparian national conservation areas) pertaining to potential wild and scenic rivers. A summary of federal, tribal, state, and local agencies and private lands is included to identify other entities associated with the river study areas.

The final section in chapter 1 discusses the scoping procedures and identifies the significant issues considered in the legislative environmental impact statement.

Chapter 2 (Alternatives)

Chapter 2 describes the alternatives that were developed to resolve the environmental issues and management actions that are associated with the implementation of those alternatives. Four alternatives were defined.

The recommended alternative determines as suitable and recommends to Congress for designation into the National Wild and Scenic Rivers System 14 river study areas. The recommended alternative determines six rivers as nonsultable and does not recommend these for designation. The all suitable alternative determines all 20 of the eligible rivers to be sultable for designation. The legislative protection alternative determines all or portions of 15 river study areas that are not under legislative protection to be suitable for designation and determines nonsultability for river study areas and segments that are in wilderness or riparian national conservation areas already under legislative protection. The fourth alternative, no action, determines all 20 eligible rivers to be nonsuitable.

Chapter 3 (Affected Environment)

The chapter addressing the affected environment identifies and summarizes the resources and other components that could be affected by implementation of the alternatives.

Chapter 4 (Environmental Consequences)

Chapter 4 is an analysis of the potential impacts from implementation of the four alternatives. The analysis focuses on the identified issues for each alternative, summarizes the relevant elements of the affected environment, identifies the appropriate management actions that may cause impacts, and contains a conclusion identifying the nature and type of impact.

Chapter 5 (Consultation and Coordination)

This chapter details the involvement of the public, and federal, state, and tribal agencies in the development of the environmental impact statement. Chapter 5 contains a list of places and persons to whom copies of the draft legislative environmental impact statement were sent, and contains an extensive record of public comments and Bureau of Land Management responses. This record includes the following.

- -- a summary of the public scoping meeting comments;
- transcripts of the statements given at the five public hearings, and copies of materials submitted for the record at those hearings;
- copies of letters commenting on the draft legislative environmental impact statement, and attachments sent with those letters.

All original materials are available for review at the Arizona state office.

The River Appendix

The river appendix contains 20 individual environmental documents. Each river-specific document discusses issues and evaluates the impacts of implementing two or more reasonable alternatives addressing sultability and nonsuitability.

Other Considerations

The numbers of acres and miles mentioned and discussed in the document are approximations. River specific management plans will be developed after Congress selects specific rivers and segments for the National Wild and Scenic Rivers System. Management plans will include precisely defined river corridors and boundaries and detailed management approaches.

For the purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation stages will be approved.

In compliance with the Council on Environmental Quality regulations for Implementing the National Environmental Policy Act, this document concentrates on significant issues identified in the scoping process (40 CFR 1501.7). A number of concerns were identified in the scoping meetings. All of the public comments were considered. However, unless the concerns were regarded by Bureau of Land Management personnel to be significant, they were not analyzed in detail.

Major textual modifications to the draft document are displayed in bold (dark) print in this final legislative environmental impact statement.

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SUMMARY

PURPOSE AND NEED

This document is a response to three separate federal legislative acts associated with land use management. One is the Federal Land Management and Policy Act of 1968 which directs the Bureau of Land Management to develop land use plans for the public lands (P.L. 94-579, Sec. 202(a)). Another is the Wild and Scenic Rivers Act which stipulates that in all "planning for the use and development of water and related land uses, consideration shall be given ... to potential national wild, scenic and recreational river areas ... (P.L. 90-542, Sec. 5(d)). The third is the National Environmental Policy Act which requires agencies to develop a "detailed statement" addressing environmental impacts and alternatives of any proposal for legislation (PL 91-190, Sec 102(C)).

Potential wild and scenic river areas were identified during the development of seven separate resource management plans by Arizona Bureau of Land Management districts and resource areas between 1985 and 1993. The river areas were evaluated and, on the basis of criteria in the Wild and Scenic Rivers Act, 20 were determined to be eligible for additional consideration because they were free-flowing and possessed at least one outstandingly remarkable value that required special protection. The 20 eligible river areas were assigned tentative management classifications as wild, scenic, or recreational.

At this point (early 1993), the State Director decided to prepare an environmental impact statement and published a Notice of Intent (February, 1993). An internal evaluation was Initiated to determine the suitability of the rivers based on criteria defined in the Bureau of Land Management Wild and Scenic Rivers Manual (MS 8351.33). Suitability assessments containing suitability recommendations for each river were completed and made available to the public in September, 1993. The suitability

assessments were the basis for the State Director's selection of the proposed action discussed in the draft legislative environmental impact statement to determine 13 river study areas as suitable and recommend them for designation by Congress into the National Wild and Scenic Rivers System. A rigorous public involvement schedule was launched and 14 public scoping meetings were held throughout Arizona to identify public issues and concerns regarding wild and scenic river designation.

Following the public, other agency, and internal review of the draft legislative environmental impact statement, the State Director modified the proposed action by incorporating the all suitable option for Cienega Creek into the recommended alternative. Thus, the recommended alternative analyzed in the final environmental impact statement includes 14 river study areas. Where appropriate, the changes in the relevant acreage and mileage totals have been incorporated into the this document.

The purpose of the action is to identify Arizona rivers with outstandingly remarkable values and to (1) determine suitability and recommend designation by Congress for Inclusion in the National Wild and Scenic Rivers System, and (2) recommend the remaining rivers as nonsuitable for designation.

ISSUES

Two general types of issues emerged from the scoping meetings held during March and April 1993. One of these types involved issues and concerns specifically associated with a particular river area. These issues focussed on how designation might impact access, grazing, mineral exploration, water rights, recreation, local development and other local concerns. These specific issues were addressed in the alternatives developed and analyzed in the

OUTSTANDINGLY REMARKABLE VALUES

River Study Area	Scenic	Recrea- tion	Fish and Wildlife Habitet	Cultural and Historic	Geologic	Hydro- logic	Paleon- tologic	Aquatic
Agua Fria River*	YES		YES	YES				
Aravaipa Creek*		YES	YES					
Big Sandy River*	YES		YES					
Bill Williams River*	YES	YES	YES					
Bonita Creek*			YES	YES				YES
Burro Creek*	YES	YES	YES	YES				
Cienega Creek*	}		YES					
Francis Creek	YES		YES					
Gila Box: Gila River*	YES	YES	YES	YES	YES	YES		
Hassayampa River	YES		YES					
Hot Springs Canyon			YES				!	
Gila Box: Lower San Franciaco River*	YES	YES	YES	YES	YES	YES		:
Middle Gila River*	YES		YES					
Parla River*	YE 5	YES	YES	YES	YES			
San Pedro River	YES	YES	YÉS	YÉS		YES	YES	
Santa Maria River*	YES		YES					
Swamp Springs			YES					
Turkey Creek	YES	YES		YES				
Virgin River*	YES	YES	YES					YES
Wright Creek			YES	YES				

^{* =} Included in the recommended alternative

individual river environmental documents contained in the appendix.

The second type of issues was statewide in nature. Among the issues were concerns about dual designation (e.g.: wild and scenic river designation in wilderness areas), mineral development, tourism, and the protection of the outstandingly remarkable values. These statewide issues were major considerations in the development of the four alternatives with their differing combinations of river areas.

ALTERNATIVES

In compliance with the Council on Environmental Quality Regulations for Implementing the National Environmental Policy Act (40 CFR 1500) a draft legislative environmental impact statement was prepared and circulated for public review and comment. The alternatives analyzed in the draft legislative environmental impact statement included one that was identified as the Bureau of Land Management proposed

YES = Outstandingly remarkable value present

action. In this final legislative environmental impact statement, the term "proposed action" has been replaced by "recommended alternative."

The Bureau of Land Management's recommended alternative determines the sultability and recommends for designation by Congress into the Wild and Scenic River System 14 river study areas. Three other alternatives are analyzed. The all suitable alternative determines all of the 20 eligible river areas to be sultable for designation. The legislative protection alternative, determines as suitable those portions of eligible rivers which are not already protected by wilderness or national conservation status. A fourth alternative, no action, determines nonsultability for all 20 eligible river areas.

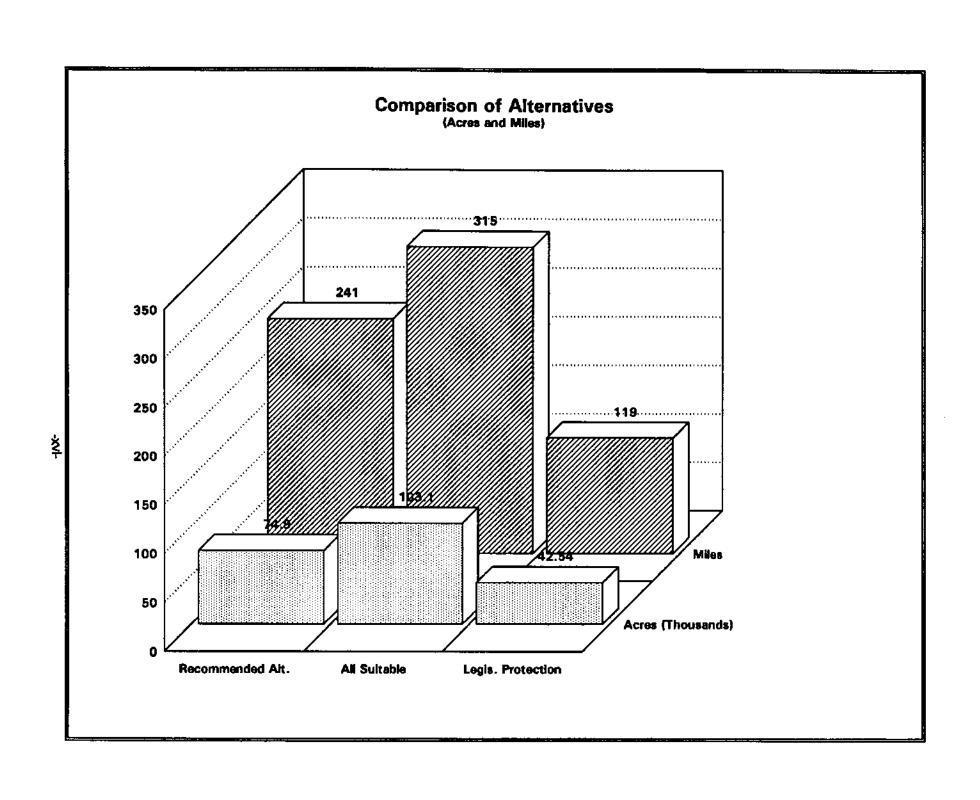
Each alternative involves a different aggregation of eligible river areas, acres, and miles. The 14 river areas included in the recommended alternative contain 74,860 acres of public land and total 241 river miles. The all suitable alternative consists of 20 river areas encompassing 103,100 public land acres and 315 river miles. Portions of 15 river areas are included in the legislative protection alternative. This alternative covers 42,550 acres of public land and 119 river miles. No river areas are recommended in the no action alternative.

The management actions of each alternative differ in a variety of ways. For example, each alternative proposes a different mixture of wild,

scenic, and recreational segments. Since wild and scenic river designation requires different levels of protective management for the various classifications, management actions for the alternatives consequently vary.

Ongoing management actions associated with wilderness, riparian national conservation area. and area of critical environmental concern administration also differ between alternatives. This is due to the different combinations of legislatively and administratively protected lands in the alternatives. Approximately 31,000 acres of lands in wildemess and 22,000 acres in riparian national conservation areas are included in the recommended alternative. In addition, the recommended alternative includes 14.500 acres in areas of critical environmental concern. The all suitable alternative has 36,000 acres in wilderness, 22,000 acres in riparlan national conservation areas, and 22,600 acres in areas of critical environmental concern. In contrast, none of the lands in the legislative protection alternative are under the legislative protection of wilderness or riparian national conservation areas. This alternative does incorporate 21,600 acres under the administrative protection of areas of critical environmental concern.

A third variation in the management actions is created by the nonsultability recommendations in the alternatives. The recommended alternative recommends six eligible river areas as nonsultable. Portions of 12 river ereas are



recommended as nonsuitable in the legislative protection alternative. The no action alternative recommends nonsuitability for all the eligible river areas; the all suitable alternative considers all the river areas as suitable.

Finally, an additional variation in wild and scenic river management actions, and ongoing management actions is caused by the different combinations of outstandingly remarkable values in the alternatives. For example, the recommended alternative includes 11 rivers with outstandingly remarkable scenic values; the legislative protection alternative includes 12 study areas with outstandingly remarkable scenic values. Because of this, recreation management actions, or riparlan vegetation management actions, or cultural resource management actions, and so forth, are not the same in each alternative.

ENVIRONMENTAL CONSEQUENCES

The document analyzes the impacts on the outstandingly remarkable values, minerals development, tourism and dual designation that would result from implementing the alternatives that recommend suitability and nonsuitability for the river areas.

impacts from implementing the Recommended Alternative

The outstandingly remarkable scenic values on 66,650 acres would benefit from long-term legislative protection under the Wild and Scenic River Act. The outstandingly remarkable scenic values on 20,340 acres recommended as nonsuitable would not have long-term legislative protection. Protection would be provided by ongoing management actions.

There would be a beneficial Impact on the outstandingly remarkable recreation values on 54,330 acres of public land from long-term legislative protection under the Wild and Scenic Rivers Act. On about 3,974 acres recommended as nonsuitable, the outstandingly

remarkable recreational values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. However, protection would be provided by ongoing management actions.

A beneficial impact from long-term legislative protection under the Wild and Scenic Rivers Act would affect the outstandingly remarkable geologic values on 17,880 acres. There would be no long-term legislative protection under the Wild and Scenic Rivers Act for 424 acres recommended as not suitable. Protection for these outstandingly remarkable values would be provided by ongoing management actions.

There would be beneficial consequences for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values on 75,440 acres. On about 27,100 public land acres there would be no long-term legislative protection under the Wild and Scenic Rivers Act for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values identified in the eligibility evaluations. However, protection would be provided by ongoing management actions.

The outstandingly remarkable cultural, historic, and paleontologic values on 45,660 acres would benefit from long-term legislative protection under the Wild and Scenic River Act. The outstandingly remarkable cultural, historic, and paleontologic values on 9,600 acres recommended as nonsuitable would not have long-term legislative protection. Protection for these outstandingly remarkable values would be provided by ongoing management actions.

There would be a beneficial impact on the outstandingly remarkable hydrologic values on 8,900 acres of public land from the long-term legislative protection under the Wild and Scenic Rivers Act. On about 430 acres recommended as not sultable the outstandingly remarkable hydrologic values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. Protection would be provided by ongoing management actions.

An adverse impact would occur on minerals development from implementation of the recommended alternative. About 2,600 acres with a moderate-to-high potential for locatable minerals would be withdrawn. Over 4,360 acres with a moderate locatable mineral potential would be withdrawn. Nearly 1,240 acres with a low-to-moderate locatable mineral potential would be withdrawn.

There would be no adverse impacts on tourism from implementation of the recommended alternative. Minor indirect beneficial impacts from increased tourism would occur in Graham and Greenlee counties.

Impacts from Implementing the All Sultable Alternative

The outstandingly remarkable scenic values on 87,470 acres would benefit from long-term legislative protection under the Wild and Scenic River Act. There would be a beneficial impact on the outstandingly remarkable recreational values on 58,800 acres of public land from the long-term legislative protection under the Wild and Scenic Rivers Act. A beneficial impact from long-term legislative protection under the Wild and Scenic Rivers Act would affect the outstandingly remarkable geologic values on 18,300 acres.

There would be beneficial consequences for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values on 102,440 acres. The outstandingly remarkable cultural, historic, and paleontologic values on 55,250 acres would benefit from long-term legislative protection under the Wild and Scenic Rivers Act. There would be a beneficial impact on the outstandingly remarkable hydrologic values on 9,340 acres of public land from the long-term legislative protection under the Wild and Scenic Rivers Act.

A long-term adverse impact would occur on minerals development from implementation of the all suitable alternative. About 2,800 acres with a moderate-to-high potential for locatable

minerals would be withdrawn. Over 5,700 acres with a moderate locatable mineral potential would be withdrawn. Nearly 2,460 acres with a low-to-moderate locatable mineral potential would be withdrawn. About 1,240 acres with a low potential for locatable minerals would be withdrawn.

There would be no adverse impacts on tourism from implementation of the all suitable alternative. Minor indirect beneficial impacts from increased tourism would occur in Graham and Greenlee counties.

Impacts from Implementing the Legislative Protection Alternative

The outstandingly remarkable scenic values on 34,010 acres would benefit from long-term legislative protection under the Wild and Scenic River Act. The outstandingly remarkable scenic values on 53,480 acres recommended as nonsuitable would not have long-term legislative protection under the Wild and Scenic Rivers Act. However, protection would be provided by ongoing management actions.

There would be a beneficial impact on the outstandingly remarkable recreation values on 15,070 acres of public land from the long-term legislative protection under the Wild and Scenic Rivers Act. On about 43,730 acres recommended as not suitable the outstandingly remarkable recreational values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. Protection for these outstandingly remarkable values would be provided by ongoing management actions.

A beneficial impact from long-term legislative protection under the Wild and Scenic Rivers Act would affect the outstandingly remarkable geologic values on 3,240 acres. There would be no long-term legislative protection under the Wild and Scenic Rivers Act for 15,050 acres recommended as not suitable. Protection would be provided by ongoing management actions.

There would be beneficial consequences for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values on 41,940 acres. On about 60,500 public land acres there would be no long-term legislative protection under the Wild and Scenic Rivers Act for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values identified in the eligibility evaluations. However, protection would be provided by ongoing management actions.

The outstandingly remarkable cultural, historic, and paleontologic values on 20,775 acres would benefit from long-term legislative protection under the Wild and Scenic Rivers Act. The outstandingly remarkable cultural, historic, and paleontologic values on 34,480 acres recommended as nonsultable would not have long-term legislative protection. Protection would be provided by ongoing management actions.

There would be a beneficial impact on the outstandingly remarkable hydrologic values on 3,240 acres of public land from the long-term legislative protection under the Wild and Scenic Rivers Act. On about 9,340 acres recommended as not sultable the outstandingly remarkable hydrologic values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. However, protection would be provided by ongoing management actions.

A long-term adverse impact would occur on minerals development from implementation of the legislative protection alternative. About 2,830 acres with a moderate-to-high locatable mineral potential would be withdrawn. Approximately 5,500 acres with a moderate locatable mineral potential would be withdrawn. Another 2,450 acres of low mineral potential acres would be withdrawn under the Wild and Scenic Rivers Act.

There would be no adverse impacts on tourism from implementation of the legislative protection

alternative. Minor indirect beneficial impacts from increased tourism would occur in Graham and Greenlee counties.

Impacts from Implementing the No Action Alternative

The outstandingly remarkable scenic values on 87,490 acres recommended as nonsultable would not have long-term legislative protection under the Wild and Scenic Rivers Act. Protection would be provided by ongoing management actions. On about 58,800 acres recommended as not suitable the outstandingly remarkable recreational values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. Protection would be provided by ongoing management actions. There would be no long-term legislative protection under the Wild and Scenic Rivers Act for 18,290 acres recommended as not suitable; protection, however, would be provided by ongoing management actions. On about 102,440 public land acres there would be no long-term legislative protection under the Wild and Scenic Rivers Act for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values identified in the eligibility evaluations. Protection would be provided by ongoing management actions. The outstandingly remarkable cultural, historic, and paleontologic values on 55,250 acres recommended as nonsuitable would not have long-term legislative protection. Protection would be provided by ongoing management actions. On about 9.340 acres recommended as not suitable the outstandingly remarkable recreational values would not receive long-term legislative protection under the Wild and Scenic Rivers Act. Protection would be provided by ongoing management actions.

There would be no adverse impacts on minerals development from implementation of the all suitable alternative. There also would be no adverse impacts on tourism from implementation of the all suitable alternative.

Bureau of Land Management, 1994

CHAPTER 1 INTRODUCTION AND PURPOSE AND NEED

INTRODUCTION

This document complies with the regulations for implementing the National Environmental Policy Act Issued by the Council on Environmental Quality (CFR 1500), the Department of Interior Environmental Manual (DM 516), the Bureau of Land Management Manual 8351 - Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, and Management, the Bureau of Land Management Environmental Handbook (MS 1792-H), and the Arizona Bureau of Land Management Environmental Handbook (1792-H).

Environmental impact statements are not decision documents. They are a component of the decision making process. The environmental impact statement, however, is important because it is developed around a public involvement process. The process begins with public scoping meetings intended to focus on significant issues identified by affected groups. These groups include the public. federal, state and local agencies, and Indian tribes. The public involvement process continues with a public review and hearings on the draft environmental document. Transcripts of the public hearings and letters commenting on the draft, along with appropriate responses from the Bureau of Land Management, are incorporated into the final environmental impact statement.

This document is a final legislative environmental impact statement. It has the same contents as other environmental impact statements but is prepared for Congressional action, based on agency recommendations.

After a 30-day public review period, this document will be transmitted to the Department of the Interior through the Director of the Bureau of Land

Management. The Secretary of the Interior transmits the document to Congress for decisions.

In this document the environmental impacts of implementing four alternatives are examined. One of these is the proposed Bureau of Land Management action; three other reasonable alternatives are examined. Congress can select any of these alternatives, or portions of several, in its decision to include rivers in the National Wild and Scenic Rivers System.

PURPOSE AND NEED FOR THE ACTION

The purpose of the action is to identify Arizona rivers with outstandingly remarkable values and to (1) determine sultability and recommend designation by Congress for inclusion in the National Wild and Scenic Rivers System, and (2) recommend the remaining rivers as nonsultable for designation.

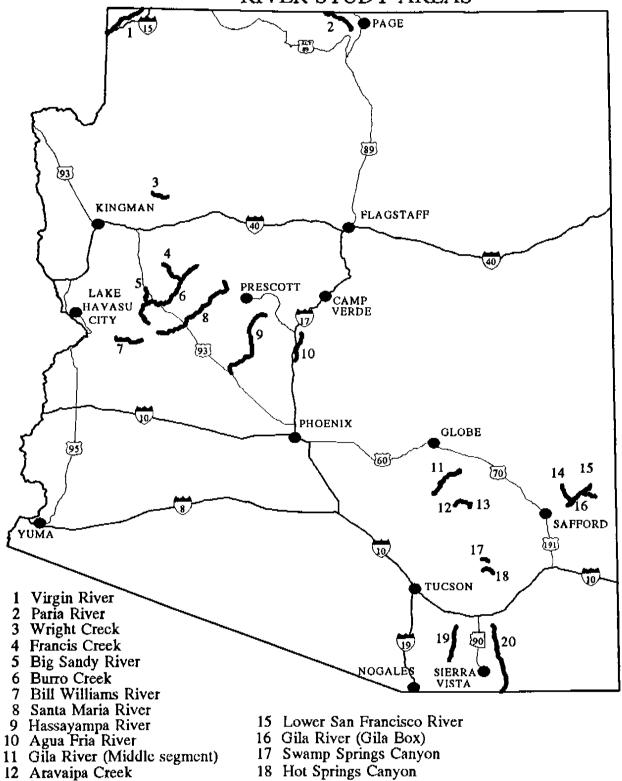
The action is a response to the Wild and Scenic Rivers Act of 1968 (P.L. 90-542), and complies with the National Environmental Policy Act of 1969 (P.L. 91-190) and the Federal Land Policy and Management Act of 1976 (P.L. 94-579).

THE ELIGIBILITY AND SUITABILITY PROCESS

The purpose of the National Wild and Scenic Rivers Act (Public Law 90-542) enacted October 2, 1968, is to preserve in "free-flowing condition" and to protect for the "benefit and enjoyment of present and future generations ... certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values" (Sec. 1(b)).

Bureau of Land Management, 1994

BUREAU OF LAND MANAGEMENT RIVER STUDY AREAS



19 Cienega Crcek20 San Pedro River

13 Turkey Creek 14 Bonita Creek

Bureau of Land Management, 1994

The Wild and Scenic Rivers Act further states that in all "planning for the use and development of water and related land uses, consideration shall be given by all federal agencies involved to potential national wild, scenic and recreational river areas The Secretary of the Interior ... shall make specific studies and investigations to determine which additional wild, scenic, and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved" (Sec. 5(d)).

In developing resource management plans, Arizona Bureau of Land Management personnel became aware of the need to inventory and classify rivers in the resource areas and districts in order to develop management strategies and techniques to protect each river's resource values.

As mentioned earlier, eligibility evaluations that identified rivers with free flowing characteristics and outstandingly remarkable values were conducted as part of the Arizona Bureau of Land Management Resource management planning process. By 1993 there were 19 river areas identified as river study areas. The 19 river study areas contained 20 rivers. Half-mile wide corridors were defined for each river segment in accordance with the Wild and Scenic Rivers Act (1/4-mile on each side).

Waterways in the Study Areas were assigned tentative classifications for protective management as Wild, Scenic, or Recreational on the basis of criteria in the Wild and Scenic Rivers Act.

- (1) Wild river areas -- Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.
- (2) Scenic river areas -- Those rivers or

sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

(3) Recreational river areas -- Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past (P.L. 90-342, Sec. 2(b)).

The Bureau of Land Management has defined management objectives and standards for the three categories of rivers. The following summarizes the management objectives and standards contained in the Bureau of Land Management Manual 8351 - Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, and Management. Copies of the Manual are available for reference in the Arizona Bureau of Land Management Field Offices.

(1) Wild Rivers:

Management of wild river areas should give primary emphasis to protecting the values which make it outstandingly remarkable while providing river-related outdoor recreation opportunities in a primitive setting.

Allowable management practices might include construction of minor structures for ... [improvement of fish and game habitat, grazing protection from fire, insects, or disease, rehabilitation or stabilization of damaged resources], provided the area will remain natural appearing and the practices or structures are compatible and in harmony with the environment. Developments such as trail bridges, occasional fencing, natural-appearing water diversions, ditches, flow

measurement or other water management devices, and similar facilities may be permitted if they are unobtrusive and do not have a significant direct and adverse effect on the natural character of the river area (MS 8351.51A).

(2) Scenic Rivers:

Management of scenic river areas should maintain and provide outdoor recreation opportunities in a nearnatural setting. The basic distinctions between a "wild" and a "scenic" river area are the degree of development. types of land use, and road accessibility. In general, a wide range of agricultural, water management, silvicultural, and other practices or structures could be compatible with scenic river values, providing such practices or structures are carried on in such a way that there is no substantial adverse effect on the river and its immediate environment.

The same considerations set forth for wild river areas should be considered, except that motorized vehicle use may, in some cases, be appropriate and that development of larger scale public-use facilities within the river area, such as moderate-sized campgrounds, interpretive centers, or administrative headquarters would be compatible if such facilities were screened from the river (MS 8351.51B).

(3) Recreational Rivers:

Management of recreational river areas should give primary emphasis to protecting the values which make it outstandingly remarkable while providing river-related outdoor recreation opportunities in a recreational setting. Recreational classification is a determination of the level of

development and does not prescribe or assume recreation development or enhancement. Management of recreational river areas can and should maintain and provide outdoor recreation opportunities. The basic distinctions between a "scenic" and a "recreational" river area are the degree of access. extent of shoreline development. historical impoundment or diversion, and types of land use. In general, a variety of agricultural, water management, silvicultural, recreational, and other practices or structures are compatible with recreational river values, providing such practices or structures are carried on in such a way that there is no substantial adverse effect on the river and its immediate environment.

Recreation facilities may be established in proximity to the river, although recreational river classification does not require extensive recreational development. Recreational facilities may still be kept to a minimum, with visitor services provided outside the river area. Future construction of impoundments, diversions, straightening, riprapping, and other modification of the waterway or adjacent lands would not be permitted except in instances where such developments would not have a direct and adverse effect on the river and its immediate environment (MS 8351.51C).

In the summer of 1993, in response to a request of the Arizona Congressional delegation, suitability assessments for each of the 20 rivers were prepared by the Arizona field offices. The assessments addressed suitability and nonsultability determinations for each of the rivers. Factors considered in the suitability determination for each study area were based on the Wild and Scenic Rivers Act (e.g.: Section 4(a)) and the Bureau of Land Management Wild

and Scenic Rivers Manual (MS 8351: Policy and Program Direction for Identification, Evaluation, and Management).

The factors included the following considerations:

- Characteristics which make the area a worthy addition to the National Wild and Scenic Rivers System.
- Status of landownership, minerals (surface and subsurface), use in the area, including the amount of private land involved and associated or incompatible uses.
- Reasonably foreseeable potential uses of the land and related waters which would be enhanced, foreclosed, or curtailed if the area were included in the National Wild and Scenic Rivers System, and the values which could be foreclosed or diminished if the area is not protected as part of the National Wild and Scenic Rivers System.
- Federal, public, state, tribal, local, or other interests in designation or nondesignation of the river, including the extent to which the administration of the river, including the costs thereof, may be shared by state, local, or other agencies and individuals.
- Estimated cost, if necessary, of acquiring lands, interests in lands, and administering the area if it is added to the National Wild and Scenic Rivers System.
- Ability of the agency to manage and/or protect the river area or segment as a wild and scenic river, or other mechanisms (existing and potential) to protect identified values other than wild and scenic river designation.

- Valid historical or existing rights which could be adversely affected.
- · Additional issues and concerns.

These reports, completed in September 1993, were distributed to the Congressional delegation, affected state, federal, and local agencies, interest groups, and libraries throughout the state. The Bureau of Land Management, in written notification to nearly 1,000 people who had expressed interest in wild and scenic river information, and statewide press releases, announced the availability of these reports. Copies were filed and made available for review at libraries and Bureau of Land Management offices in Arizona and St. George Utah. Chart 1-1 identifies factors considered for suitability determination for each river study area in the development of the recommended alternative (P.L. 90-542, Sec 4(a)); BLM MS 8351.33A).

The Arizona State Director reviewed these assessments and concluded that all or parts of 13 Arizona rivers were sultable and should be recommended for designation into the National Wild and Scenic Rivers System. The State Director's recommendation for the 20 Wild and Scenic River study areas was identified in the draft environmental impact statement as the proposed action. In this final environmental impact statement the State Director's recommendation is identified as the recommended alternative.

The environmental impacts of the recommended alternative for sultability determination and other reasonable alternatives are analyzed in the environmental documents contained in the river appendix. There are at least two alternatives for each river study area: the recommended alternative and no action. In the case of river study areas where the recommended alternative recommends suitability as Wild, Scenic, Recreational the no action alternative recommends nonsultability. Where the

recommended alternative is for nonsuitability, another alternative examines the impacts of determining all the eligible segments suitable. In some cases, where it is reasonable, a part

suitable alternative, which recommends suitability only for part of the eligible segments, is analyzed as a third alternative.

CHART 1-1
SUITABILITY ASSESSMENT SUMMARY

			
RIVER STUDY AREA	CHARACTERISTICS WHICH SUPPORT/DO NOT SUPPORT DESIGNATION	OTHER MAJOR SUITABILITY FACTORS	BLM SUITABILITY RECOMMENDATION (RECOMMENDED ALTERNATIVE)
Agua Fria River	Agua Fria has been recognized for uniqueness and importance in the region's landscape and history. Special protection of the free-flowing values and outstandingly remarkable values is required.	Future population growth of Phoenix Metropolitan area could threaten free- flowing values and values in the future. BLM manages 94% of the acreage in corridor.	Three segments (22.4 mi.) recommended suitable.
Avaveipa Creek	Due to the quantity and diversity, the creek possesses Nationally significant outstandingly remarkable values worthy of recognition in the NWSRS.	Designation would expend the representation of the Mexican Highland Section of the Basin and Range Physiographic Province in the NWSRS.	Only segment (10 mi.) recommended suitable.
Big Sendy River	Potential reising of Alamo Dam would threaten the free-flowing values of Segment B, which includes an extremely valuable riperian ecosystem, providing significant habitat for birds, fish, endangered species and other wildlife. Speciel management protection is needed in the recommended river segment.	Most of the area in Segment A is recommended as nonsuitable because it is in other than public ownership, so protection of values by BLM would be impractical.	Segment A (19.0 mi) recommended nonsuitable. Segment B (9.2 mi) recommended suitable.
Bill Williams River	This river would be a unique addition to the NWSRS as a representative of the Sonoran Desert/Mexicen Highland transition of the Sesin and Range Physiographic Province; designation would protect free-flowing characteristics and outstandingly remarkable fish and wildlife, scenic and recreation values.	With designation, BLM would be provide protection for the outstandingly remarkable values of 21.1 miles of river corridor, complementing the management of two adjacent wilderness areas. The Fish and Wildlife Service, administers, and has determined to be eligible, an additional 11 mile segment further downstream.	All BLM segmente (21.1 mi) recommended suitable.
Bonita Creek	Hecommended segment has nationally significant fish and wildlife hebitat, as well as unique cultural sites of national importance in American archaeology. These deserve protection, as part of the NWSRS.	Lower portion recommended nonsuitable considered unmanageable as a component of the NWSRS because of rights and operations of city primery water system and presence of 4 parcels of private land totalling 350 acres.	Partial segment (8.1 mi.) recommended suitable. Remainder of segment (8.9 mi.) recommended nonsuitable.
Burro Creek	The segments recommended represent the best sections in terms of scenic quality and primitive recreation. The most spectacular canyonlands along Burro Creek are included in these segments. Special resource protection of scenic, recreational, and cultural values would be afforded in the long term by proposed designation on federal portions of the river (7,190 ac.).	Substantial State Trust (2,940 ac.) and private lands (3,350 ac.) exist in Segments A, C, and E. Local sentiment is egainst designation of Burro Creek. State of Arizona has not supported or opposed designation. Some threats to scenic quality from mining activities exist without designation.	Portion of Segment A (2.2 mi); entire Segment B (8.5 mi); all of Segment D (9.0 miles) and portion of Segment E (5.5 mi.) be recommended suitable. Segment C (7.1 mi.), portion of Segment A (11.3 mi.), and portion of Segment E (8.0 mi.) recommended nonsuitable.

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RIVER STUDY AREA	CHARACTERISTICS WHICH SUPPORT/ DO NOT SUPPORT DESIGNATION	OTHER MAJOR SUITABILITY FACTORS	BLM SUITABILITY RECOMMENDATION (RECOMMENDED ALTERNATIVE)
Cianega Creek	The segments are not nationally significant, there are no threats to free-flowing values or outstandingly remarkable values, and no additional protective management needed for habitat of endangered Gila topminnow.	No substantial changes in management would occur if river aggments were added to NWSRS.	Segments A. (4.0 ml.) and B. (6.5 ml.) recommended sultable.
Francis Creek	This is not a nationally significant river segment, but is locally significant since the community of Bagdad gets 65% of its domestic water from this stream and has a access road and pumping station located in the midsection of the segment. No known threats to free-flowing characteristics in foreseeable future exist.	The majority of this segment is in private ownership (1,670 ac.) and State Trust land ownership (530 ac.). Manageability by BLM portions (1,360 ac.) could be difficult since the private land owners oppose designation.	Segment (11.4 mi.) is recommended nonsuitable.
Gile Box: Gila River	This is a nationally significant waterway, and an integral part of the nation's and Arizona's history. Today the river continues its role in modern society providing water for mining, agriculture, and domestic uses, habitat for wildlife, and opportunities for recreation. Designation would add protection to the values, ensure continued commercial and recreational use, and to ensure its legacy for future generations.	There are no valid existing rights, current land uses, edjacent private land uses, land ownership patterns, upstream water rights, or other issues that could impair BLM's ability to preserve the free-flowing nature end outstandingly remarkable values.	Three river segments (26.6 mi.) are recommended suitable.
Hassøyampa River	The Hassayampa River would be unmanageable as a whole. The majority of private land ownership is by a multitude of owners. Public Land ownership in Segments A and C accounts for about 24% of the total river area, Mining is predominant use in Segment C.	The majority of Segment B is edequately protected in Hassayarnpa River Cenyon Wilderness. There are no threats of development or other actions which could be prevented through a NWSRS designation.	Three river segments (33.4 mi.) are recommended nonsuitable.
Hot Springs Canyon	The segment is not nationally significant, there are no threats to free-flowing values or outstandingly remarkable values, and no additional protective management needed for fish and wildlife values.	If not designated, would be managed as part of the Swamp Springs/Hot Springs Watershed ACEC. If designated, there would be little, if any change from current management.	One segment (8.0 mi.) is recommended as nonsuitable.
Gila Box: Lower Sen Francisco River	This river is nationally and regionally significant due to the role it played in the exploration and settlement of the Southwest. Designation of recommended segments would expand the representation of the Mexican Highlands section of the Basin and Range Physiographic Province in the NWSRS, while providing special protection to the outstandingly remarkable hydrologic and recreation values.	No existing or planned uses would be adversely affected by designation. Future electrical needs at the mine in Morenoi and the presence of private land along the river may create manageability problems in the upper end of Sagment 1. Continued growth of tailing impoundments north of the study river could degrade the outstanding accenery.	The lower end of Segment 1 (3.4 miles) and Segment 2 (3.0 mi.) are recommended suitable. The upper end of Segment 1 (1.6 mi.) is recommended nonsuitable.

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RIVER STUDY AREA	CHARACTERISTICS WHICH SUPPORT/ DO NOT SUPPORT DESIGNATION	OTHER MAJOR SUITABILITY FACTORS	BLM SUITABILITY RECOMMENDATION (RECOMMENDED ALTERNATIVE)
Middle Gila River	The federal portions of Segment 3 would benefit by special management protection of scenic, recreational, wildlife habitat, and geologic values. The remaining segments recommended as nonsuitable due to the difficulty of manegeability due to the amount of private and tribal lands.	The San Carlos Apacha Tribe which owns 19.1 miles of shoreline out of the 32 miles of river segment has strongly opposed adding the Middle Gila to the NWSRS, . No known proposels which would threaten free-flowing values, however, major flooding (1992-93) could trigger future impoundment proposels.	A portion of Segment 3 (7.5 mi.) is recommended suitable. Segmente 1 (5.5 mi.), 2 (12.5 mi.), and the remainder of 3 (8.5 mi.) are recommended nonsuitable.
Paria River	Outstanding scenic values consisting of deep, narrow colorful sandstone gorges to 2,800 feet in depth. Exemplifies the classic structural geologic features of the Colorado Plateau in its 7 layered formations and erosive patterns. Requires special management protection beyond the protection provided by the wilderness designation.	Designation would not seriously restrict, curtail, or foreclose any on-going or proposed activities.	The Arizona Strip Resource Manegement Plan (1992) praviously recommended BLM Arizona segment suitable (28 mi.), ex well as an edditional 7 miles maneged by the Department of Interior in Utah and Arizona
San Padro River	The river is a nationally prominent riperien ecosystem and renke as the top area in the western hemisphere for peleontological sites associated with early mankind. Groundwater depletion on edjacent lands and in Mexico could edversely affect surface flows.	The 2.0 miles recommended as nonsuitable lie between the southern and northern sections of the San Padro Riparian NCA, These were found nonsuitable because a decision was made not to acquire easements for access.	Two river segments (44 mi.) are recommended suitable. A portion of one segment (2.0 mi.) of private land is recommended nonsuitable.
Sente Meria River	Potential raising of Alamo Dam would threaten the free-flowing values of Segment A, which includes an extremely valuable riparien ecosystem, providing significant habitet for birds, fish and other wildlife. This segment is currently an important backcountry travel route in the Arrestre Mountain Wilderness Aree. Special management protection is needed in the recommended river segment.	The segments not recommended for designation were determined nonsuitable because the protection of outstandingly remarkable values would be unmanageable by BLM, due to the intermingled land ownership (private and State Trust Lands).	Portion of Segment A (17.8 mi.) is recommended suitable. The remainder of Segment A (3.4 mi.) and Segment B (17.8 mi.) are recommended nonsuitable.
Swemp Springe	The segment is not nationally significent, there are no known threats to free-flowing values or outstandingly remarkable values, and no additional protective management needed for wildlife species.	If not designated, would be maneged as pert of the Swamp Springs/Hot Springs Watershed ACEC. If designated, there would be little, If any change from current management.	One segment (2,5 mi,) is recommended nonsuitable.
Turkey Creek	The river area is not considered unique or of national importance, there are no threats to the free-flowing characteristics, and outstandingly remarkable values are adequately protected in an ACEC.	Wilderness, ACEC, and riperian management would provide essentially the same protection afforded by NWSRA designation.	One segment (3.2 mi.) is recommended nonsuitable.

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RIVER STUDY AREA	CHARACTERISTICS WHICH SUPPORT/ DO NOT SUPPORT DESIGNATION	OTHER MAJOR SUITABILITY FACTORS	BLM SUITABILITY RECOMMENDATION (RECOMMENDED ALTERNATIVE)
Virgin River	The Vegin Flour would be a worthy addition to the MMSRS, because it would be the only representative ever in the transition zone between the Been and Range and Calarado Plateau Physiographic Provinces. The outstandingly remerkable values require special management protection.	The Arizone portion is managemble, and designation would not seriously restrict, curtail, or fereclose any on-going or proposed activities. However, there could be some impacts on water development upstream in southwest Utah.	BLM recommends four segments in Arizone recommended as suitable, but proposes that Congress direct effected agencies in Utah, Arizone, and Nevade to study as a NWSFA 5(e) Study Fiver.
Wright Creek	The eigenent is not nationally or regionally significant, no threats to free-flowing values, and outstandingly remarkable values have adequate protection in Area of Critical Environmental Concern.	Although general local interest in Congressional designation may be considered moderate to high, Wright Creak by itself has generated little specific comment.	One river segment (13.0 mi.) recommended normalitable.

RIVER STUDY AREA MANAGEMENT

Arizona Bureau of Land Management public lands are administered by a state office, four district offices, and ten resource area offices.

The Arizona Strip District

The Arizona Strip District administers nearly 2.9 million acres, or more than 54 percent of the 5.3 million-acre Arizona Strip. The area is composed of lands north and west of the Colorado River to the Utah border, and west to the Nevada border. The district and resource area offices are in St. George, Utah.

Most Arizona Strip District lands are located in the Colorado Plateau physiographic province; the western portion is located in the Basin and Range province.

The Arizona Strip District administers public tand in two of the wild and scenic river study areas. The Virgin River study area is administered by the Shivwits Resource Area. The Paria River study area is administered by the Vermilion Resource Area.

The Phoenix District

The Phoenix District consists of approximately 7.1 million acres of land generally located in the central and western portions of the state. The district has three resource area offices, each responsible for a different geographical subarea. Eight wild and scenic river study areas are managed by the Phoenix District.

Five of these study areas are in the Kingman Resource Area, which covers about 2.6 million acres in west central Arizona. The study areas Include the Big Sandy River, Burro Creek, Francis Creek, the Santa Maria River, and Wright Creek.

The Phoentx Resource Area manages nearly one million acres of public lands in central and eastern Arizona. Three of the wild and scenic river study areas are administered by this resource area. The study areas are the Agua Fria River, the Hassayampa River, and the Middle Gla River below Coolidge Darn.

The third Phoenix District resource area office, the Lower Gila Resource Area, manages over 3.7 million acres in west central Artzona. A portion of the Santa Maria River is in this resource area. Table 1-1 lists the 20 rivers and their outstandingly remarkable values.

TABLE 1-1
OUTSTANDINGLY REMARKABLE VALUES

	-							, .
River Study Area	Scenic	Recrea- tion	Fish and Wildlife Habitat	Cultural and Historic	Geologic	Hydro- logic	Paleon- tologic	Aquatic
Agua Fria River*	YES		YES	YES				
Aravaipa Creek*	YES	YES	YES					
Big Sandy River*	YES		YES					
Bill Williams River*	YES	YES	YES					
Bonita Creek*			YES	YES				YES
Burro Creek*	YES	YES	YES	YES				
Cienega Creek*			YÉS				<u> </u>	
Francis Creek	YES	,	YES					
Gila Box: Gila River*	YES	YES	YES	YES	YES	YES		
Hassayampa River	YES		YES					
Hot Springs Canyon			YES					
Gila Box: Lower San Francisco River*	YES	YES	YES	YES	YES	YES		
Middle Glia River*	YES		YES					
Paria River*	YES	YES	YES	YES	YES			
San Padro River	YES	YES	YES	YE5		YES	YES	
Santa Maria River	YES		YES					
Swamp Springs			YES					
Turkey Creek	YES	YES		YES				
Virgin River*	YES	YES	YES		YES			YES
Wright Creek			YES	YES				

^{* =} Included in the recommended alternative

The Safford District

The Safford District covers approximately 1.8 million acres of public land in southeastern Arizona from Tucson east to the New Mexico border and south from Winkelman to the Mexican border. Nine wild and scenic river study areas are in the Safford District.

The Gila Resource Area, one of three resource

area offices in the Safford District, manages five wild and scenic river study areas. These are Aravaipa Creek, Bonita Creek, Gila Box: Gila, Gila Box: Lower San Francisco River, and Turkey Creek.

Four wild and scenic river study areas are administered by the Tucson Resource Area. These include Cienega Creek, Hot Springs Canyon, the San Pedro River, and Swamp

YES = Outstandingly remarkable value present

These include Cienega Creek, Hot Springs Canyon, the San Pedro River, and Swamp Springs Canyon.

No river areas were determined to be suitable in the third Safford resource area, the San Simon Resource Area.

The Yuma District

The Yuma District covers nearly 2.5 million acres of public land in western Arizona and about 80,000 acres in California. The Havasu Resource Area manages public land in the Bill Williams river study area. There are no eligible rivers in the Yuma District's Yuma Resource Area.

INTERRELATIONSHIPS

While the management of the wild and scenic rivers discussed in this document would be the responsibility of the Bureau of Land Management, the administration of the river study areas has a number of interrelationships. Among these are the existing land uses established by the Bureau of Land Management for public lands.

This section summarizes four of the management areas in which the wild and scenic river study areas are located, and lists some of

the federal, tribal, and state agencies that would be affected by future river management. County and private land data are also listed.

Management Areas

The Bureau of Land Management has administrative responsibilities for more than 14 million acres of public land in Arizona. Management actions and uses on all of the Bureau of Land Management public lands are governed by land use plans. In addition, special management guidance governs actions and uses on a variety of other planning units including wilderness areas, riparlan national conservation areas, areas of critical environmental concern, special management areas, recreation management areas, riparlan management areas, and livestock grazing allotments. Details on four special categories of management are discussed below.

Land use plans

Approximately 90 percent of the 14.2 million acres of Arizona public lands are under resource management plans developed since 1984. The remainder is under a management framework plan developed in 1983. Table 1-2 lists the subject rivers and associated land use plans.

TABLE 1-2 RIVERS BY RESOURCE MANAGEMENT PLAN

RIVER AREA	RESOURCE MANAGEMENT PLAN (RMP)	TOTAL RIVER STUDY AREA IN RIMP (BLM PUBLIC LAND ACRES)
Agus Fris*	Phoerix Resource Area	6,710
Aravaipa*	Safford District	3,200
Big Sandy*	Kingman Resource Area	4,220
Bill Williams*	Yuma District	4,650
Bonita Creek*	Safford District	3,670
Burro Creek*	Kingman Resource Area	9,460
Clonega Creek*	Sefford District Amondment	3,200
Francis Creek	Kingman Resource Area	1,360
Gile Box*	Safford District	7,480
Нескужира	Phoenix Resource Area	6,386
Hot Springs	Safford District	1,600
Lower San Francisco*	Safford District	1,874
Mid Gila*	Safford District	6,130
Parie*	Arizona Strip District	8,960
San Padro*	Safford District Amendment	12,266
Santo Maria*	Kingman Resource Area	7,080
Swamp Springs	Safford District	640
Turkey Creek	Safford District	1,100
Virgin*	Arizona Strip District	9,344
Wright Creek	Kingman Resource Area	3,861

= Recommended alternative

Wilderness Areas

Wilderness areas are authorized by Congress. The Arizona Bureau of Land Management is responsible for approximately 1.4 million acres of wilderness. Arizona wilderness areas were created under three separate bills: the Aravaipa Wilderness Act of 1984 (6,699 acres;

August 8, 1984), the Arizona Wilderness Act of 1984 (265,600 acres; August 28, 1984), and the Arizona Desert Wilderness Act (1,260,000 acres; November 28, 1990).

Table 1-3 lists the eligible wild and scenic river study areas and the approximate acres in wilderness areas.

TABLE 1-3 RIVERS BY WILDERNESS AREA

RIVER AREA	WILDERNESS AREA	TOTAL RIVER STUDY AREA (OLM PUBLIC LAND ACRES)	TOTAL RIVER STUDY AREA IN WILDERNESS (ACRES)	PCT OF RIVER STUDY AREA IN WILDERNESS
Agus Fris*		6,710		0.0
Aravaipa*	Aravaipa Canyon	3,200	3,200	100.0
Big Sandy*	Arrestre Mountain.	4,220	2,580	61.1
Bill Williams*	Rewhide Mountains Swansea	5,149	2,750 1,800	53.4 35.0
Bonita Creek*		3,570		0.0
Burro Creek*	Upper Burro Creek	9,460	3,226	34.1
Cienega Creek*		3,200		0.0
Francis Creek	Upper Burro Creek	1,360	480	35.3
Gile Box*		7,460		0.0
Hassayampa	Hassayampa River Canyon	6,386	3,525	55.2
Hot Springs		1,600		0.0
Lower San Francisco*		1,874		0.0
Mid Gila"	Noodle's Eye	6,130	2,240	36.5
Paris*	Paris-Vermilion Cliffs	8,960	8,960	100.0
San Pedro*		12,256		0.0
Santa Maria*	Arrastra Mountain	7,080	4,270	60.3
Swamp Springs	Redfield Carryon	640	640	80.0
Turkoy Creek	Aravaipa Canyon	1,100	370	33.6
Virgin*	Peiuto-Boaver Dam	9,344	5,090	54.5
Wright Creek		3,861		0.0
Totale		103,560	38,660	37.3

* = Recommended alternative

Management actions and uses in wilderness areas are governed by the Wilderness Act and management plans developed by the Bureau of Land Management.

- Riparian national conservation areas

Information on the approximate acreage of the riparian national conservation areas in eligible wild and scenic river study areas is shown in

Table 1-4.

Riparian national conservation areas are established by Congressional authority. In Arizona the San Pedro River Riparian National Conservation Area (54,189 acres with an additional 6,521 acres acquired by exchange) was established November 18, 1988; the Gila Box Riparian National Conservation Area

(20,900 acres) was created November 28, 1990

by the Arlzona Desert Wilderness Act.

TABLE 1-4
RIVERS BY AREA OF RIPARIAN NATIONAL CONSERVATION AREA (RNCA)

RIVER AREA	RIPARIAN NATIONAL CONSERVATION AREA (RNCA)	RIVER STUDY AREA (ACRES)	RIVER STUDY AREA IN RNCA (ACRES)	PCT OF RIVER STUDY AREA IN RNCA
Agua Fris*		6,710		0.0
Aravaipa*		3,200		0.0
Big Sandy*		4,220		0.0
Bill Williams*		4,650		0.0
Bonita Creek*	Glia Box Riparian National Conservation Area	3,670	3,570	100.0
Burro Creek*		9,460		0,0
Cienega Creek*		3,200		0.0
Francis Creek		1,360		0.0
Gila Box*	Gila Box Riparian National Conservation Area	7,460	6,050	100.0
Наввауатра		6,386		0.0
Hot Springs		1,600		0,0
Lower San Francisco*	Gila Box Riparian National Conser∨ation Area	1,874	40	2,1
Mid Gila*		6,130		0,0
Paria*		8,960		0.0
San Pedro*	San Pedro Riparian National Conservation Area	12,256	12,256	100.0
Şanta Maria*		7,080		0.0
Swamp Springs		640		0.0
Turkey Creek		1,100		0.0
Virgin *		9,344		0.0
Wright Creek		3,861		0.0
TOTALS		103,560	23,326	22.5

= Recommended alternative

Areas of Critical Environmental Concern

Areas of critical environmental concern are established by administrative action through the land use planning process in accordance with the Federal Land Management and Policy Act of 1969. Areas of critical environmental concern in Arizona have been established to protect and preserve historic, cultural, scenic, fish and wildlife habitat, riparian and vegetation, geologic, paleontologic, recreation, and hydrologic resource values.

Arizona has 621,286 acres in 55 separate areas

of critical environmental concern. Table 1-5 shows the eligible wild and scenic river study

areas and appropriate area of critical environmental concern acreage.

TABLE 1-5
RIVERS BY AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)

			, ,	
HIVEH AHEA	AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)	TOTAL RIVER STUDY AREA (BLM PUBLIC LAND ACRES)	TOTAL RIVER STUDY AREA IN ACEC (ACRES)	PCT RIVER STUDY AREA IN ACEC
Agua Fria*	Perry Mesa	6,710	2,160	32.2
Aravaipa*		3,200		0.0
Big Sandy*	3 Rivers Riparian	4,220	1,010	23.9
Bill Williams*	3 Rivers Riparian	4,650	600	12.9
Bonita Creek*		3,670		0.0
Burro Creek*	Burro Creek Riparian and Cultural	9,460	4,935	52.2
Cienega Creek*		3,200		0.0
Francis Creek	Burro Creek Riparian and Cultural	1,360	480	36.3
Gila Box*		7,460		0.0
Hassayampa		6,386		0.0
Hot Springs	Swamp Springs /Hot Springs	1,600	1,600	100.0
Lower San Francisco*		1,874		0.0
Mid Gila*		6,130		0.0
Paria *		8,960		0.0
San Pedro*	St David Cienega San Pedro River San Rafael	12,256	190 560 370	1.5 4.8 3.0
Santa Maria+	3 Rivers Riparian	7,080	1,060	15.0
Swamp Springs		640		0.0
Turkey Creek	Turkey Creek Riparian	1,100	560	50.9
Virgin *	Virgin River Corridor	9,344	9,344	100.0
Wright Creek	Wright and Cottonwood Creeks	3,861	3,860	100.0
TOTALS		103,560	27,629	26,7

^{* =} Recommended alternative

Other Interior Department Agencies

Other agencies in the Department of the Interior with lands adjacent to, or administrative responsibilities associated with the subject rivers, include the National Park Service, the Bureau of Indian Affairs, the Fish and Wildlife

Service, the Bureau of Reclamation, the U.S. Geological Survey, and U.S. Bureau of Mines.

Other Federal Agencies

Federal agencies outside the Department of interior with lands adjacent to or administrative

responsibilities associated with the subject rivers include the U.S. Forest Service, U.S. Army Corps of Engineers, Department of the Army, Department of the Air Force, Marine Corps, and the International Boundary and Waters Commission.

Native American Tribes

Tribal groups with lands adjacent to or administrative responsibilities associated with the subject rivers include the Colorado River Indian Tribes, Cocopah, Quechan, Kalbab-Palute Tribe, Havasupai, Hualapai, San Carlos Apache, Tohono O'Odham, and the Salt River Pima-Maricopa Indian Community and Gila River Pima-Maricopa Indian Community.

California tribal groups Include the Mohave and

Chemehuevi with lands on the western shores of the Colorado River.

State Agencies

State agencies with lands adjacent to or administrative responsibilities associated with the subject rivers include the Arizona State Land Department, Arizona Department of Environmental Quality, Arizona Parks Department, Arizona Game and Fish Department, and Arizona Department of Water Resources.

Countles

The 20 river study areas flow through portions of 11 Arizona Counties. These are displayed in Table 1-6.

TABLE 1-6 RIVERS BY COUNTY

RIVER AREA	COUNTY
Agus Fria*	Vavapai
Aravaipa*	Graham, Pinal
Big Sandy*	Mohave
Bill Williams*	Moheve, Le Paz
Bonita Creek*	Graham
Burro Creek*	Mohave, Yavapai
Cienega Creek*	Pime
Francia Creek	Mohave, Yavepai
Gila Box"	Graham, Graenies
Hassayampa	Mericopa, Yavepei
Hot Springs	Cocline
Lower San Francisco *	Greenlee
Middle Cile*	Gila, Pinal
Parie*	Cosonino
San Pedro*	Coctine
Santa Maria *	Moheve, La Paz, Yavapai
Swamp Springs	Graham
Turkey Crook	Graham
Vingin *	Mohave
Wright Creek	Mohave

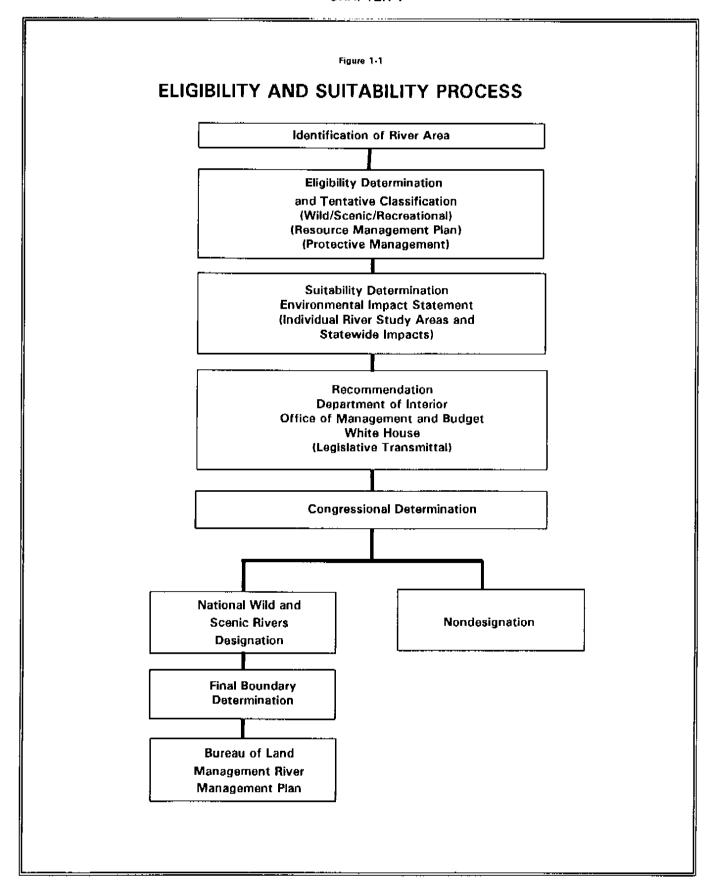
Recommended alternative

<u>Private</u>

There are approximately 80 miles of river that cross private land (24,000 acres) in the 20 wild and scenic river study areas considered in this document.

Other

Several of the rivers on Arizona lands edministered by the Bureau of Land Management flow from and Into other jurisdictions. The headwaters of the San Pedro River are in Mexico. The San Francisco River flows Into Arlzona from New Mexico. The Paria and Virgin Rivers flow south Into Arlzona from Utah. The Virgin River flows from Arlzona into Nevada.



SCOPING

Fourteen public open house meetings were announced and held in 12 of the 15 Arizona counties and one Utah county. Over 450 people attended the open house meetings held between March 29 and April 22, 1993. Issues relating to wild and scenic river study areas on Bureau of Land Management administered public land were raised by the general public, affected parties and groups, Indian tribes, commercial and industrial interests, and federal and state agencies during the scoping period.

In addition, as part of the scoping process, the Bureau of Land Management developed mailings and newspaper announcements encouraging people to send their concerns and issues to the field and state offices.

Scoping Issues

Chapter 5, Consultation and Coordination, includes an extensive listing of public comments received during the scoping period. The list is organized into categories that reflect specific resource-oriented concerns (minerals, lands, recreation, fish and wildlife habitat, water resources).

The Issues identified below summarize and consolidate the individual items in the larger listing. For example, the individual concerns about recreation, fish and wildlife habitat, riparian vegetation, and hydrology are incorporated into the discussions for the specific outstandingly remarkable values.

- Impacts on outstandingly remarkable scenic values
- Impacts on outstandingly remarkable recreation values
- Impacts on outstandingly remarkable fish and wildlife habitat values
- Impacts on outstandingly remarkable cultural resource and historic values
- Impacts on outstandingly remarkable geologic values

- Impacts on outstandingly remarkable hydrologic values
- Impacts on outstandingly remarkable aquatic values
- Impacts on mineral development
- Impacts on tourism
- Impacts on water rights
- Impacts on water quality and stream flow
- · Impacts of dual designation
- · Impacts on rights of way and development
- Impacts on private property
- Cost to the federal government of Arizona wild and scenic rivers
- · Need to evaluate the Colorado River

Issues considered but not discussed in detail

Impacts on water rights.

Designation as a Wild, Scenic, or Recreational river would not affect existing, valid water rights. The Wild and Scenic Rivers Act creates a federal reserved water right for a quantity of water sufficient to meet the purposes of the act on designated river segments. The Bureau of Land Management would have the responsibility to preserve each designated segment in its free-flowing condition to protect its outstandingly remarkable values. The quantity of water necessary to fulfill that responsibility would be determined through assessments of instream flow needs.

A new federal reserved water right asserted by a wild and scenic river designation would be junior to all valid and existing rights. This action would have no impact on existing water rights either upstream or downstream because it would be junior to any existing right.

In addition, the Bureau of Land Management would seek to acquire other means of protection through the purchase, on a willing seller-willing buyer basis, of senior downstream water rights, land exchanges, negotiated agreements, or other appropriate arrangements.

This issue will not be discussed further.

CHART 1-2 SCOPING MEETINGS

PLACE	DATE	REGISTERED
Parker, La Paz County, Arizona	March 29, 1993	19
Bagdad, Yavapai County, Artzona	April 5, 1993	93
Kingman, Mohave County, Arizona	April 6, 1993	14
Wickenburg, Maricopa County, Artzona	April 7, 1993	17
Winkelman, Pinal County, Artzona	April 12, 1993	9
Tucson, Pima County, Arizona	April 13, 1993	34
Phoenix, Maricopa County, Arizona	April 14, 1993	54
Benson, Cochise County, Arizona	April 15, 1993	10
St. George, Washington County, Utah	April 16, 1993	21
Clifton, Greenlee County, Arizona	April 19, 1993	45
Safford, Graham County, Arizona	April 20, 1993	38
Klondyke, Graham County, Arizona	April 21, 1993	21
Sierra Vista, Cochise County, Artzona	April 22, 1993	30
Sonolita, Santa Cruz County, Arizona	April 23, 1993	10

Impacts on water quality and stream flow.

Since federal reserved water rights would be junior to existing rights, there would be no affect on stream flow from designation. Management plans for designated rivers will address water quality and stream flow monitoring.

Impacts of dual designation.

Dual designation refers to the designation of a wild and scenic river in an area already under special congressional protection such as in wilderness, or a riparian national conservation area. This issue resulted in the development of the legislative protection alternative analyzed in the document. The issue is discussed in detail under the legislative protection alternative.

Impacts on rights of way and devalopment.

While new rights of way are discouraged, they are not prohibited in wild and scenic river areas. Since wild and scenic river designation does not authorize the Bureau of Land Management to regulate activities on private land there would be no significant impacts to any private developments.

Impacts on private property.

Wild and scenic river designation does not authorize the Bureau of Land Management to regulate or control activities on private land.

Wild and scenic river cost to the federal government.

The Bureau of Land Management is required by the Wild and Scenic Rivers Act to evaluate rivers for wild and scenic river designation. Outside of the necessary expenses associated with the cost of public involvement (meetings, document publication), the cost of this effort in Arizona has not required additions to the normal operating budget.

Need to evaluate the Colorado River.

Consideration of evaluating the Colorado River below Hoover Dam for wild and scenic river eligibility was considered but rejected because of the number of agencies with river management responsibilities. The Bureau of Land Management would support the development of an interagency environmental impact statement addressing the eligibility and suitability of the Colorado River.

Chapter 5 contains an extensive selected list of the public comments received during the scoping meetings and in letters. Responses to the comments listed in Chapter 5 were prepared and reviewed by Bureau of Land Management personnel.

WILD AND SCENIC RIVER DESIGNATION ISSUES

An interdisciplinary team of resource specialists reviewed public comments received during the scoping meetings to determine the areas of major concern. The team, together with resource managers, incorporated these major concerns into the design and selection of a range of reasonable alternatives. Review comments submitted at public hearings and in letters were carefully reviewed. Where appropriate, the environmental impact statement was revised in accordance with the review comments. The transcripts of the five public hearings, and complete copies of the letters received during the 90-day public comment period are included in chapter 5.

Four alternatives are analyzed in this statewide wild and scenic river environmental impact statement. One, the recommended alternative approved by the State Director, determines that all or parts of 14 rivers are sultable for designation into the National Wild and Scenic Rivers System. Another is an alternative that determines nonsultability and recommends that Congress does not designate the river study areas. This alternative would be a continuation of present management. A third alternative

determines all 20 eligible rivers as sultable for designation by Congress into the National Wild and Scenic Rivers System. The fourth alternative, based on the dual/multi-designation issue raised during the scoping period, determines suitability only for those eligible rivers and portions of rivers that have no other legislative protection.

CHAPTER 2 ALTERNATIVES INCLUDING THE RECOMMENDED ALTERNATIVE

INTRODUCTION

Four alternatives for wild and scenic river suitability recommendations are described in this chapter. This is considered a reasonable range of alternatives developed in response to information gathered during the scoping process.

Because of the statewide nature, the alternatives in the statewide document differ from those for each of the rivers in the river appendix. The alternatives in the appendix deal specifically with 20 river study areas and individually address the issues associated with determining suitability and recommendations for river areas and segments for designation. At least two alternatives were developed for each river; where appropriate, more were formulated.

In contrast, the alternatives in this document have been designed to focus on the aggregated impacts of various statewide options. An internal suitability report was developed to evaluate the 20 rivers (40 segments) determined to be eligible for further study. This internal

document identified 27 segments in 13 river study areas as suitable for recommending designation. The remaining seven rivers were identified as nonsultable. This combination of rivers was identified as the Bureau of Land Management proposed action in the draft environmental impact statement; in this final environmental impact statement the Bureau recommendation with 29 segments in 14 river study areas is the recommended alternative.

Other reasonable combinations of eligible river study areas have been constructed. They range from one which recommends designation of all the river study areas to one in which no recommendation for designation is made (the required no action alternative). There is one alternative that recommends only those rivers that are suitable and not under any existing legislative protection for designation.

Each segment in the study areas was classified as wild, scenic, or recreational in the eligibility phase of the assessment. Table 2-G1 shows the array of classifications in the phase.

TABLE 2-G1
ALTERNATIVES: SUMMARY OF MILES/ACREAGE BY CLASSIFICATION

ALTERNATIVE	RIVERS (BLM public land acres)	WILD (BLM public land acres)	SCENIC (BLM public land acres)	RECREATIONAL (BLM public land acres)
Recommended alternative	241 miles/74,860 acres	34,522	13,762	26,586
All Suitable	315 miles/103,861 acres	49,478	23,433	29,880
Legislative Protection	119 miles/42,650 acres	12,430	16,177	13,940

The alternatives contain different amounts of public land already under legislative protection (wilderness and riparian national conservation areas) or special administrative protection (areas of critical environmental

concern). The differences are displayed in Table 2-G2. (The all suitable alternative and the no action alternative have the same amount of wilderness, riparian national conservation area and area of critical environmental concern acreage.)

TABLE 2-G2 ALTERNATIVES SUMMARY OF ACREAGE INCORPORATED BY MANAGEMENT CLASSIFICATION

ALTERNATIVE	WILDERNESS (BLM public land acres)	FINCA (BILM public land acres)	ACEC (ELM public land acres)
Recommended alternative	31,480ac	21,916ec	14,465an
All Suitable	36,459ac	21,916ac	21,639ec
Without Legislative Protection	0	O	17,636ac
No Action	36,459ac	21,916es	21,639ec

Table 2-G3 displays selected management actions that would occur under the three alternatives recommending wild and scenic river designation. Management actions identified with an asterisk (*) are required for segments

designated as Wild. The other management actions are ongoing and are implemented through resource management plans, or plans for wilderness areas, riparian national conservation areas, and areas of critical environmental concern.

TABLE 2-G3 SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

MANAGEMENT ACTION	RECOMMENDED ALTERNATIVE	ALL SUITABLE ALTERNATIVE	LEGISLATIVE PROTECTION ALTERNATIVE
*New mineral entry prohibited	8,230ac	10,997ac	12,338ac
*No surface patent	20,459	39,021	42,672
*Restricted motorized use	8,230ac	13,130ac	12,338ac
*Prohibit major water developments	241mi	315mi	106mi
*Prohibit major recreation facility developments	8,230ec	13,130ac	12,338ac
*Prohibit new road and trail development	6,230ac	13,130ac	12,338ac
*Prohibit woodcutting	8,470ac	13,370ac	12,578ac
Mineral withdrawal in ACECs	2,488ac	10,166ac	20,195ac
Acquisitions	17,943ac	20,034ac	18,403ac
Discourage new ROWs	71,660ac	103,446ac	42,558ac
New roads prohibited	8,230ac	13,130ac	12,338ac
Roads closed	37mi	42mi	6mi
No Surface Occupancy	14,194ac	27,246ac	28,246ac
Restrict campground development	10,738ac	11,518ac	7,516ac
OHV limited to existing roads and trails	9,645ac	19,893ac	19,893ac
OHV limited to designated roads and trails	28,790ac	26,397ac	8,771 ac
Intensive recreation restricted	10,738ac	11,518ac	7,518ac
Helicopter flight ban	7,488ac	7968ac	7968ac
Seasonal recreation restriction	7,488ac	7968ac	7968aç
New water sources	26	37	36

⁼ Wild and Scenic Rivers Act management action

RECOMMENDED ALTERNATIVE

The recommended alternative identifies 29 segments in 14 river study areas as sultable for designation. The 29 segments in the 14 river areas in the recommended alternative cover 241 miles, encompassing 74,860 acres. Twelve segments (34,522 acres) are recommended for designation and a Wild classification. Seven segments (13,752 acres) are recommended for designation as Scenic. Ten segments (26,586 acres) are recommended for designation and a

Recreational classification.

Twenty of the segments are currently under special Congressional legislative protection. Fourteen are in wilderness areas and six are in riparian national conservation areas.

Table 2-RA1 displays details on miles and acreage by segment. Acreage is limited to public lands since wild and scenic river management actions apply only to lands under federal management.

TABLE 2-RA1 RECOMMENDED ALTERNATIVE: BLM MILES/ACRES WITH CLASSIFICATIONS

RIVER AREA	TOTAL (BLM PUBLIC LAND ACRES)	SEGMENT 1	SEGMENT 2	SEGMENT 3	SEGMENT 4	SEGMENT 5
AGUA FRIA	20.6/6710	6.7/1390 (Scenic)	10,0/3230 (Wild)	4.1/2090 (Scenic)		
ARAVAIPA	10.0/3200	10.0/3200 (Wilderness/Wild)				
BIG SANDY	6,7/2190	0.0/00 (NS)	6.7/2190 (Wildemoss/Wild)			
BILL WILLIAMS	17.4/4650	9.8/2314 (Wildemess/Wild)	1.4/486 (Scenic)	6.2/1850 (Wilderness/ Wild)		
BONITA CREEK	5.4/1010	5.4/1810 (RNCA/ Recreational)				***
BURRO CRÉEK	23.7/7010	1.7/500 (Wilderness/Wild)	8.5/2750 (Wilderness/Wild)	0.0/00(NS)	9.0/2630 (Wild)	4.5/1130 (Wild)
CIENEGA CREEK	10.0/3,200	4.0/1280 (Scenic)	6.0/1920 (Scenic)			
GILA BOX	25.5/7460	6.0/1940 (RNCA/ Recreational)	15,0/4250 (RNCA/ Scenic)	4.5/1270 (RNCA/ Recreational)		
LOWER SAN FRANCISCO	5.4/1450	2.5/710 (flecreational)	2.9/740 (RNCA/ Recreational)			
MIDDLE GILA	5.0/1760	0.0/00(NS)	0.0/00(NS)	5.0/1780 (Recreational)		
PARIA	26.0/8960	28.0/8960 (Wilderness/Wild)				
SAN PEDRO	38.3/12256	2.0/640 (RNCA/ Recreational)	0.0/00{NS)	36.3/11616 (RNCA/ Recreational)		
SANTA MARIA	15.6/4840	15_6/4840 (Wilderness/Wild)	0.0/00(NS)			
VIRGIN	29,2/9344	2.9/928 (Wilderness/Wild)	7.3/2336 (Wilderness/Scenic)	7.4/2368 (Wildemess/ Recreational)	11.6/3712 (Recreational)	

KEY: (RNCA) = Riparian National Conservation Area; (NS) = Nonsuitable

NOTE: Classifications apply only to BLM acres

Management Actions

As indicated in Table 2-G3, Management Actions by Alternative, two types of management actions would occur. One type consists of management actions required by wild and scenic river designation. The other type embodies ongoing management actions. The list of ongoing management actions summarizes appropriate provisions specified for

resource management plans, areas of critical environmental concern management plans, riparlan national conservation area management plans and wilderness management plans.

Wild and Scenic River management actions

Wild and Scenic River designation would require certain management actions to be initiated. In accordance with the Wild and Scenic River Act, the following actions would occur on the 75,340 acres of the recommended alternative. If the wild and scenic river management actions overlap ongoing management actions, the more stringent actions would be applied.

- Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 8,230 acres in 12 Wild segments. (The rest of the acreage is already withdrawn.)
- Mining claims, subject to valid existing rights, could be patented only as to the mineral estate and not the surface estate on 20,409 acres of Wild, Scenic and Recreational segments.
- In 29 segments designated Wild, Scenlc, or Recreational, new rights-of-way would be discouraged.
- In 12 Wild segments, new flood control dams, levees, or other works would be prohibited.
- Construction of impoundments, diversions, straightening, riprapping, and other modification of the waterway or adjacent public lands, would be prohibited in 29 segments except where such developments would not have a direct and adverse effect on the river and its immediate environment.
- All water supply dams and major diversions would be prohibited.
- Instream flows would be quantified and protected on the 29 segments. An instream flow assessment would be made in order to secure instream flow protection for applicable

outstandingly remarkable values.

- Construction of new roads or trails for motorized travel would be prohibited in 12 Wild segments.
- New roads would be prohibited on 8,230 acres 12 Wild segments.
- In 12 Wild segments, motorized use would be restricted. Exceptions could be for search and rescue and other emergency situations. In the 17 Scenic and Recreational segments, motorized travel would be permitted if there was no impairment of outstandingly remarkable values.
- In the 12 Wild segments, campgrounds, interpretive centers, or administrative headquarters within the river corridor would be prohibited. In the 17 Scenic and Recreational segments, moderate-sized campgrounds, interpretive centers, or administrative headquarters would be permitted
- Recreational use would be encouraged in Wild river areas, but public use and access could be regulated.
- In the 12 Wild segments, woodcutting would be prohibited. Exceptions could be to clear trails, for visitor safety, or to control fire. In the 17 Scenic and Recreational segments, woodcutting would be permitted.
- Livestock grazing use would be restricted to current levels in Wild segments.

Ongoing management actions

The ongoing management actions listed below are currently in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national conservation area plans, resource management plans and area of critical environmental concern plans.

- Approved plans of operation would be required for all mining related activities above the level of casual use as defined at 43 CFR 3809.0-5(b), which are conducted under the authority of the General Mining Law of 1872, on 7,488 acres covered by areas of critical environmental concern. This would occur in the Bill Williams River, Big Sandy River, Burro Creek, and Santa Maria River study areas.
- Up to 7,086 acres would be acquired on a willing seller-willing buyer basis or by exchange in 11 river areas according to resource management plans. This would occur in all study areas except the Paria.
- Up to 42 miles of roads in three river study areas would be closed in accordance with management provisions in two riparlan national conservation areas and one area of critical environmental concern. Roads would be closed in the Agua Fria, Bonita Creek, Cienega Creek, and Gila Box: Gila River study areas.
- New road development would be prohibited within 1/2 mile of a bald eagle nest in four river study areas (8,230 acres) in accordance with management provisions in areas of critical environmental concern. The study rivers include Big Sandy River, Bill Williams River, Burro Creek and Santa Maria River.
- Camping would be restricted to a 14-day limit on 10 river study areas in accordance with resource management plans.
- Camping would be limited to fewer than 14 days on three river study areas, according to guidance in riparian national conservation area and wilderness area management plans.
- Campground development would be restricted to areas outside riparian zones and the 100-year floodplain in five river study areas (10,738 acres) in compliance with stipulations for areas of critical environmental concern and riparian national conservation area management (Big Sandy River, Bill Williams River, Bonita Creek, Burro Creek, Santa Maria River).

- Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in four river study area's covering 10,738 acres according to areas of critical environmental concern. The study areas include Big Sandy River, Bill Williams River, Burro Creek and Santa Maria River.
- Off highway vehicle use would be limited to existing roads and trails on 9,645 acres of river study areas according to requirements in area of critical environmental concern management plans (Agua Fria, Big Sandy River, Burro Creek, Lower San Francisco, Middle Gila River, Santa Maria River).
- Off highway vehicle use would be limited to designated roads and trails on 28,790 acres in ten river study areas. Excluded from this are the Aravaipa and Paria study areas which are in wilderness, and the Middle Gila River study area.
- Helicopter flights would be prohibited over four study areas (7,488 acres) on the basis of requirements in areas of critical environmental concern. This would occur in the Bill Williams River, Big Sandy River, Burro Creek, and Santa Maria River study areas.
- Erosion control structures (stabilization, diversions) would be developed in the Cienega Creek and San Pedro River study areas (39.3 riparlan miles) in accordance with management provisions in the riparlan national conservation area management plan.
- Cottonwood and willow planting would occur on up to 1,890 acres of the Agua Fria, Bill Williams River, and San Pedro River study areas in compliance with area of critical environmental concern management plans.
- Woodcutting would be prohibited on 17,134 acres in five river study areas as provided in area of critical environmental concern management plans, riparian national conservation area Plans, and resource

management plans (Bonita Creek, Cienega Creek, Gila Box: Gila River, Middle Gila River, Virgin River).

- Wood collaction would be restricted to down and dead materials in the Cienega Creek, Santa Maria River and Virgin River study areas (7,7767 cres).
- Wood collection would be prohibited on 6,710 acres in the Agua Fria study area.
- Removal of native plants would be prohibited in 2,600 acres of four study areas (Big Sandy River, Bill Williams River, Burro Creek, Santa Maria River).
- Actions to eliminate exotic fish would be implemented on up to 60 riparian miles in four river study areas as provided by area of critical environmental concern.
- Approximately 5,450 acres of salt cedar would be removed from five river areas according to provisions in area of critical environmental concern and resource management plans. This would occur in the Aravaipa, Big Sandy River, Bill Williams River, Middle Gila River, and San Pedro River study areas.
- Up to 15 miles of fencing that includes exclosures would be developed in riparlan areas in the Bill Williams River, Bonita Creek, and Lower San Francisco River study areas (8,409 acres) according to management provisions for areas of critical environmental concern.
- In 16 segments (19,200 acres) included in the recommended alternative for inclusion in the National Wild and Scenic Rivers System cultural resources would be inventoried; site protection strategies involving fencing, monitoring, or stabilization would be developed; research would be encouraged and selected sites would be interpreted as appropriate for public visitation.
- Proposed activities that could result in

increased use or surface disturbance in 13 river study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed.

- Sites evaluated as eligible for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.
- Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.
- Water quality monitoring would be conducted as required by the State on 54 miles of five rivers (25,724 acres) designated by the state as unique waters.
- Monitoring to determine minimum stream flow requirements to protect outstandingly remarkable values on 241 riparian miles would occur on 14 rivers.
- Up to 26 new upland water sources would be developed for grazing management in six study areas, according to management provisions for areas of critical environmental concern and riparian national conservation areas. The study areas are the Big Sandy River, Bill Williams River, Bonlta Creek, Burro Creek, Gila Box: Gila River, and Santa Maria River.

ALL SUITABLE ALTERNATIVE

The all suitable alternative recommends all 40 segments and 20 river study areas as suitable for designation. The 40 segments in the 20 river areas in the all suitable alternative cover 315.1 riparian miles or approximately 103,061 acres. Table AS-1 provides details on riparian miles and acreage by segment.

There are 17 segments (approximately 42,518) determined to be sultable and recommended for designation with a Wild classification. The remaining 23 segments (60,400 acres) are determined suitable for designation as either Scenic or Recreational.

Under the all suitable alternative, 59,305 acres within the river study areas are under special legislative protection. Seventeen segments (35,979 acres) are in wilderness areas and six segments (21,916 acres) are in riparian national conservation areas.

Management Actions

As indicated in Table 2-G3, Management Actions by Alternative, two types of management actions are considered. One consists of management actions required by wild and scenic river designation. The other embodies ongoing management actions. These currently are in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national

conservation plans, resource management plans and area of critical environmental concern plans.

Wild and Scenic River management actions

Wild and Scenic River designation would require certain management actions to be initiated. In accordance with the Wild and Scenic River Act the following actions would occur on the 103,541 acres in the all suitable alternative. If the wild and scenic river management actions overlap ongoing management actions, the more stringent actions would be applied.

- Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 10,997 acres in the Wild segments of six study areas. (The rest of the acreage is already withdrawn.)
- Mining claims, subject to valid existing rights, could be patented only as to the mineral estate and not the surface estate on 33,740 acres of Wild, Scenic and Recreational segments.

TABLE 2-AS1 ALL SUITABLE ALTERNATIVE: BLM PUBLIC LAND MILES/ACRES WITH CLASSIFICATIONS

RIVER AREA	TOTAL	SEGMENT 1	SEGMENT 2	SEGMENT 3	SEGMENT 4	SEGMENT 5
AGUA FRIA	20.8/6710	6.7/1390(SC)	14.2/53200(WL)			
ARAVAIPA	10.0/3200	10.0/3200(WN/ WL)				
BIG SANDY	13.8/4220	7.1/2030(SC)	6.7/2190(WN/ Wt)			:
BILL WILLIAMS	17.4/4650	9.8/2314(WN/ WL)	2.5/610(WN/SC	5.0/1547(WN/ WL)		
BONITA CREEK	10.1/3570	10.1/3570 (RNCA/RE)				
BURRO CREEK	31.4/9460	4.2/1190(WN/ WL)	8,5/2750(WN/ WL)	2.2/630(RE)	9.0/2630(WL)	7.5/2260(SC)
CIENEGA CREEK	10/3200	4.0/1 280(SC)	6.0/1920(SC)			
FRANCIS CREEK	4.2/1380	4.2/1360(RE)				
GILA BOX	26.5/7460	6.0/1940(RNCA/ SC)	15.0/4250 (RNCA/WL)	4.5/1270 (RNCA/SC)		
HASSAYA M PA	19.4/6386	0.9/250(RE)	11.9/2890 (WN/WL)	5,6/2890 (WN/WL)		
HOT SPRINGS	5.0/1600	5.0/1600(WL)				
LOWER SAN FRANCISCO	8,2/1874	3.3/1134(RE)	2.9/740 (RNCA/WL)			
MIDDLE GILA	5.7/6130	5.0/580(RE)	12.5/2630(WN/ WL)	7.0/2920(RE)		
PARIA	2B.0/8960	28.0/8960(WN/ WL)				
SAN PEDRO	38.3/12256	38.3/12240 (RNCA/RE)				
SANTA MARIA	23.3/7080	17.1/5310 (WN/WL)	6.2/1770(SC)			
SWAMP SPRINGS	2.0/640	2.0/640 (WN/WL)				
TURKEY CREEK	3.2/1100	3.2/1100(RE)				
VIRGIN	29.2/9344	2.9/928 (WN/WL)	7.3/2336 (WN/SC)	7.4/2368 (WN/RE)	11.6/3712(RE)	
WRIGHT CREEK	12.5/3861	12.5/3861(SC)				
TOTAL MILES/ACRES	315.1/ 103560					

Key: WL = Wild; WN = Wilderness; RE = Recreational; SC = Scenic

- In 40 segments (103,061 acres) designated Wild, Scenic, or Recreational, new rights-of-way would be discouraged.
- In nine Wild segments, new flood control dams, levees, or other works would be prohibited.
- Construction of impoundments, diversions, straightening, riprapping, and other modification of the waterway or adjacent public lands would be prohibited in 40 segments except where such developments would not have a direct and adverse effect on the river and its immediate environment.
- All water supply dams and major diversions would be prohibited.
- Instream flows would be quantified and protected on the 40 segments. An instream flow assessment would be made in order to secure instream flow protection for outstandingly remarkable applicable values.
- Construction of new roads or trails for motorized travel would be prohibited in nine Wild segments.
- New roads would be prohibited on 11,037 acres in the Wild segments of six study areas.
- In the Wild segments of 11 study areas, motorized use would be restricted. Exceptions could be for search and rescue and other emergency situations. In the 21 Scenic and Recreational segments, motorized travel would be permitted if there was no impairment of outstandingly remarkable values.
- In the 12 Wild segments, campgrounds, interpretive centers, or administrative headquarters within the river corridor would be prohibited. In the 21 Scenic and Recreational segments moderate-sized campgrounds, interpretive centers, or administrative headquarters would be permitted

- Recreation use would be encouraged in the Wild, Scenic, and Recreational river areas, but public use and access could be regulated.
- In the Wild segments of six study areas, woodcutting would be prohibited. Exceptions could be to clear trails, for visitor safety, or to control fire. In the 21 Scenic and Recreational segments, woodcutting would be permitted.
- Livestock grazing use would be restricted to current levels in Wild segments.

· Ongoing management actions

The ongoing management actions listed below are currently in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national conservation area plans, resource management plans and area of critical environmental concern plans.

- Mineral leases would have stipulations for no surface occupancy in 14 river areas covering 27,516 acres in accordance with resource management plans and management prescriptions for areas of critical environmental concern. All eligible rivers except for those entirely in wilderness (Aravaipa, Parla, Swamp Springs), or riparian national conservation areas (Bonlta, Gila Box; Gila River, San Pedro River) would be included.
- Mineral entry, leasing, and material sales would be recommended for withdrawal on 10,166 acres in six river study areas (Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, Santa Maria River, Wright Creek) in compliance with management provisions in areas of critical environmental concern.
- Up to 20,033 acres would be acquired on a willing seller-willing buyer basis or by exchange in 17 river study areas according to management provisions in Areas of Environmental Concern and resource management plans. There are no acquisition

plans for the Aravaipa, Paria, and Turkey Creek Areas.

- Up to 42 miles of roads would be closed in four river study areas (Agua Fria, Bonlta, Cienega Creek, Gila Box: Gila River) in accordance with management provisions in two riparian national conservation areas and two areas that are under area of critical environmental concern plans or resource management plans.
- New road development would be prohibited within 1/2 mile of a bald eagle nest in five segments (7,968 acres) of five study areas in accordance with management provisions in areas of critical environmental concern. The study areas include the Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and Santa Maria rivers.
- Camping would be restricted to a 14-day limit on 17 river study areas according to guidance in resource management plans.
- Camping would be restricted to fewer than 14 days in the Aravalpa, Paria, and San Pedro River study areas in compliance with riparian national conservation areas and wilderness area management plans.
- Campground development would be restricted to areas outside riparian zones and the 100-year floodplain in six river study areas (11,518 acres) in compliance with stipulations for areas of critical environmental concern and riparian national conservation area management plans. This includes the Big Sandy River, Bill Williams River, Bonita Creek, Burro Creek, Francis Creek, and Santa Maria rivers
- Intensive recreational activities would be prohibited within 1/2 mile of a baid eagle nests/falcon nests during breeding season in five river study areas covering 7,968 acres in areas of critical environmental concern (Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and Santa Maria River).

- Off highway vehicle use would be limited to existing roads and trails on 19,983 acres of 11 river study areas according to requirements in area of critical environmental concern in the Agua Fria, Big Sandy River, Burro Creek, Cienega Creek, Francis, Hassayampa, Lower San Francisco, Middle Gila River, Santa Maria River, Turkey, and Wright Creek study areas.
- Off highway vehicle use would be limited to designated roads and trails on 26,397 acres of nine river study areas in compliance with provisions of the Wild and Scenic Rivers Act.
 The subject rivers would be the Big Sandy River, Bill Williams River, Bonita, Burro, Francis, Gila Box: Gila River, San Pedro River, and Virgin River.
- Helicopter flights would be prohibited over five study areas (7,968 acres) on the basis of management requirements in five areas of critical environmental concern. The subject rivers include the Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and Santa Maria River areas.
- Erosion control structures (stabilization, diversions) would be developed in the Cienega Creek and San Pedro River study areas (39 river miles) in accordance with management provisions in riparian national conservation area management plans and resource management plans.
- Cottonwood and willow planting would occur on 2,550 acres in the Agua Fria, Bill Williams River, Hassayampa and San Pedro River study areas in compliance with resource management plans, areas of critical environmental concern management plans and riparian national conservation area management plans.
- Woodcutting would be prohibited on 21,604 acres in the Cienega Creek, Gila Box: Gila River, Hot Springs, and Virgin River study areas as provided in area of critical environmental concern management plans.

- Wood collection would be restricted to down and dead materials on 7,776 acres in two river study areas (Cienega Creek and Virgin River) in accordance with area of critical environmental concern management provisions.
- Wood collection would be prohibited on 13,100 acres in the Agua Fria and Hassayampa River study areas according to provisions in resource management plans.
- Removal of native plants would be prohibited on 7,400 acres of six study areas (Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, Santa Maria River, and Wright Creek) in compliance with area of critical environmental concern management plans.
- Actions to eliminate exotic fish would be implemented on nearly 70 riparian miles in four study areas (Agua Fria, Aravaipa, Cienega Creek, Virgin River) as provided by resource management plans, area of critical environmental concern plans and wilderness management plans.
- Approximately 28 miles of fencing that includes exclosures would be developed in riparlan areas in the Bill Williams River, Bonita Creek and Lower San Francisco River study areas according to provisions for riparian national conservation areas and resource management plans.
- In the 40 segments (103,541 acres)
 recommended in the all suitable alternative for
 Inclusion in the National Wild and Scenic Rivers
 System, cultural resources would be
 inventorled; site protection strategies involving
 fencing, monitoring, or stabilization would be
 developed; research would be encouraged, and
 selected sites would be interpreted as
 appropriate for public visitation.
- Proposed activities that could result in increased use or surface disturbance in 20 river

study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed.

- Sites evaluated as eligible in river study areas for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.
- Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.
- Water quality monitoring would be conducted as required by the state on about 85 riparlan miles of rivers the Bonita, Burro Creek, Francis Creek, Hot Springs, Swamp Springs, and Wright Creek study areas designated by the state as unique waters.
- Up to 37 new upland water sources would be developed for grazing management in nine study areas according to management provisions for areas of critical environmental concern.

LEGISLATIVE PROTECTION ALTERNATIVE

The legislative protection alternative recommends 25 segments in 15 study areas as suitable for designation. Table 2-LP1 shows the information by river and segment.

The legislative protection alternative covers about 119 riparian miles totalling approximately 42,547 acres of public land. Table 2-LP1 displays the river study areas and segments included in the alternative.

TABLE 2-LP1 LEGISLATIVE PROTECTION ALTERNATIVE: BLM PUBLIC LAND MILES/ACRES

	TOTAL	SEGMENT 1	SEGMENT 2	SEGMENT 3	SEGMENT 4	SEGMENT 5
AGUA FRIA	20.9mi/6710ac	7.7ml/1390ac (SC)				
BIG SANDY	7.1mi/2030ac	7.1ml/2030ac (SC)				
BILL WILLIAMS	1.4mi/611ac	0.2mi/148ac(WL)	1.4mi/463ac(SC)			
BURRO CREEK	7.1/6230sc	2.0mi/710ac (WL)		2, 2mi/630ac (RE)	9,0mi/2630aç (WL)	7.5mi/2260ac (SC)
CIENEGA CREEK	10mi/3200ac	4.0Mi/1280ac (SC)	6.0/1920 (SC)			
FRANCIS CREEK	4, 2mi/1 360ac	4.2mi/1360ac (RE)				
GILA BOX	4.5mi/1410ac	1.5mi/420ac (SC)		3.0ml/990ac (SC)		
HASSAYAMPA	2.6mi/2860ac	0.9mi/250ac (RE)	0.5mi/200ac (WL)	1.2ml/2410ac (RE)		
HOT SPRINGS	5.0mi/1600ac	5.0mi/1600ac (WL)				
LOWER SAN FRANCISCO	5.9mi/1834ac	3.0mi/1094ac (RE)	2,9mi/740ac (WL)			
MIDDLE GILA	11.5mi/3650ac	2.0ml/500ac (RÉ)	0.5ml/230ac (WL)	9.0mi/2920ac (RE)		
SANTA MARIA	9.5mi/2610ac	3.3mi/1040ac (WL)	6.2mi/1770ac (SC)			
TURKEY CREEK	3.2mi/730ac	3.2mi/730ac(RE)				
VIRGIN	13.3mi/4256ac		8.8ml/256ac(SC)	0.9ml/288ac (RE)	11.6mi/3712ac (RE)	
WAIGHT CREEK	12.5mi/3861ac	12.5mi/3861ac (SC)				
TOTAL	105.4/42,558					

Key: WL = Wild; RE = Recreation; SC = Scenic

Although there is no special legislative protection for the rivers and segments shown in Table 2-LP1, nearly 17,700 acres are in administratively designated areas of critical environmental concern, a category established

by and defined in the Federal Land Policy and Management Act of 1969.

Rivers and acreage under areas of critical environmental concern are shown in Table 2-LP2.

TABLE 2-LP2
ELIGIBLE RIVERS AND SEGMENTS WITH ADMINISTRATIVE PROTECTION

			T			
ELIGIBLE RIVER AREA	TOTAL BLM MILES/ACRES	SEGMENT 1	SEGMENT 2	SEGMENT 3	SEGMENT 4	SEGMENT 5
Agua Fria	7.7mi/ 2160ac		ACEC;2160ac			
Big Sandy	7.1ml/ 2030ac	ACEC:1009ac				
Bill Williams	1.4mi/ 611ac		ACEC:360ac			
Burro Creek	7.1mi/ 6230ac	ACEC:710ac			ACEC: 2630ac	ACEC:1130ac
Cienega Creek	10mi/ 3200ac					
Francis Creek	4.2mi/ 1360ac	ACEC:480ac				
Gila Box	4.5mi/ 1410ac					
Hassayampa	2.6mi/ 2860ac					
Hot Springs	5.0mi/ 1600ac	ACEC:1600ac				
Lower San Francisco	5.9mi/ 1834ac					
Middle Gila	11.5mi/ 3650ac					
Santa Maria	9.5mi/ 2810ac	ACEC:1060ac				
Turkey Creek	3.2mi/ 730ac	ACEC:560ac				
Virgin River	13.3mi/ 4256ac		ACEC: 256ac	ACEC: 288ac	ACEC3712ac	
Wright Creek	12.5mi/ 3861ac	12.5mi/ 3861ac	ACEC:3861ac			

The eligibility studies classified segments in the river study areas into three categories: Wild, Scenic, and Recreational.

The legislative protection alternative determines 30 segments (42,547 acres) to be suitable and recommends them for designation. Eight

(10,830 acres) segments are recommended as Wild. The remaining segments are recommended for a Scenic or Recreational designation.

Management Actions

As indicated in Table 2-G3, Management Actions by Alternative, two types of management actions are considered. One consists of management actions required by wild and scenic river designation. The ongoing management actions listed below are currently in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national conservation plans, resource management plans and area of critical environmental concern plans.

Wild and Scenic River management actions

Wild and Scenic River designation would require certain management actions to be initiated. In accordance with the Wild and Scenic Rivers Act, the following would occur on the 42,547 acres of segments in the legislative protection alternative. If the wild and scenic river management actions overlap ongoing management actions, the more stringent actions would be applied.

- Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 12,338 acres in nine Wild segments.
- Mining claims, subject to valid existing rights, could be patented only as to the mineral estate and not the surface estate on 42,547 acres of Wild, Scenic or Recreational segments.
- In 29 segments (41,942 acres) designated
 Wild, Scenic, or Recreational new rights-of-ways
 would be discouraged.
- In nine Wild segments new flood control dams, levees, or other works would be

prohibited.

- Construction of impoundments, diversions, straightening, riprapping, and other modification of the waterway or adjacent public lands would be prohibited in 40 segments except where such developments would not have a direct and adverse effect on the river and its immediate environment.
- All water supply dams and major diversions would be prohibited.
- Instream flows would be quantified and protected on the 29 segments. An instream flow assessment would be made in order to secure instream flow protection for outstandingly remarkable applicable values.
- Construction of new roads or trails for motorized travel would be prohibited in nine Wild segments.
- New roads would be prohibited on 12,338 acres in nine Wild segments.
- In nine Wild segments motorized use would be prohibited. Exceptions could be for search and rescue and other emergency situations. In the 20 Scenic and Recreational segments, motorized travel would be permitted if there was no degradation of outstandingly remarkable values.
- In the 12 Wild segments, campgrounds, interpretive centers, or administrative headquarters within the river corridor would be prohibited. In the 20 Scenic and Recreational segments moderate-sized campgrounds, interpretive centers, or administrative headquarters would be permitted
- Recreational use would be encouraged in the Wild, Scenic, and Recreational river areas, but public use and access could be regulated.
- In the nine Wild segments, woodcutting would be prohibited. Exceptions could be to clear trails, for visitor safety, or to control fire.

In the 20 Scenic and Recreational segments, woodcutting would be permitted.

 Livestock grazing use would be restricted to current levels in Wild segments.

Ongoing management actions

The ongoing management actions listed below are currently in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national conservation plans, resource management plans and area of critical environmental concern plans.

- Mineral entry, leasing, and material sales would be recommended for withdrawal on 12,338 acres on 13 of the 15 study areas, in compliance with management provisions in areas of critical environmental concern. This would not apply to the Gila Box: Gila River or Middle Gila River study areas.
- Up to 18,403 acres would be acquired on a willing seller-willing buyer basis or by exchange in 14 of the 15 river study areas in accordance with resource management plan provisions.
 There are no plans to acquire lands in the Turkey Creak study area.
- Up to six miles of roads would be closed in two study areas (Agua Fria, Cienega Creek, and Gila Box: Gila River) according to management provisions in areas of critical environmental concern and resource management plans.
- New road development would be prohibited within 1/2 mile of a bald eagle nest in the Big Sandy River, Bill Williams River, Burro Creek, Francis, and Santa Maria River study areas (7,968 acres) in accordance with management provisions in areas of critical environmental concern.
- Camping would be restricted to a 14-day limit on 15 river study areas according to guidance in resource management plans.

- Campground development would be restricted to areas outside riparian zones and the 100-year floodplain in five river study areas (7,518 acres) in compliance with stipulations for areas of critical environmental concern management plans. The study areas are the Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and Santa Maria rivers.
- Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in the Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and Santa Marla River study areas covering 7,968 acres in areas of critical environmental concern.
- Off highway vehicle use would be limited to existing roads and trails on 19,893 acres of 11 river study areas according to requirements in area of critical environmental concern management plans and resource management plans. This would include the Agua Frla, Big Sandy River, Burro Creek, Clenega Creek, Francis, Hassayampa, Lower San Francisco, Middle Gila River, Santa Maria River, Turkey Creek, and Wright Creek study areas.
- Helicopter flights would be prohibited over five study areas (7,968 acres) on the basis of management requirements in areas of critical environmental concerns. The study areas include the Big Sandy River, Bill Williams River, Burro Creek, Francis Creek, and the Santa Maria River.
- Erosion control structures (stabilization, diversions) would be developed in the Cienega Creek study area (1 mile), in accordance with resource management plan provisions.
- Cottonwood and willow planting would occur on 1,430 acres in the Agua Fria and Hassayampa River study areas in compliance with area of critical environmental concern management plans and resource management plans.
- Woodcutting would be prohibited on 18,354

acres in the Cienega Creek, Hot Springs, Middle Gila River, Turkey and Virgin River study areas as provided in area of critical environmental concern management plans and resource management plans.

- Wood collection would be restricted to down and dead materials in two (7,456 acres) study areas in accordance with area of critical environmental concern management provisions.
- Wood collection would be prohibited on 9,570 acres in the Agua Fria and Hassayampa River study areas according to provisions in resource management plans.
- Removal of native plants would be prohibited in 7,080 acres of five study areas in compliance with area of critical environmental concern management plans.
- Approximately 1,540 acres of salt cedar would be removed from the Big Sandy River, Bill Williams River, and Middle Gila River study areas according to provisions in area of critical environmental concern and resource management plans.
- Nearly 18 miles of fencing that includes exclosures would be developed in riparian areas in the Bill Williams River, Lower San Francisco and Wright Creek study areas (6,306 acres) according to management provisions for areas of critical environmental concern and resource management plans.
- In the 15 study areas (29 segments)
 recommended in the legislative protection
 alternative for inclusion in the National Wild and
 Scenic Rivers System cultural resources would
 be inventoried; site protection strategies
 involving fencing, monitoring, or stabilization
 would be developed; research would be
 encouraged, and selected sites would be
 interpreted as appropriate for public visitation.
- Proposed activities that could result in increased use or surface disturbance would be reviewed by a cultural resource specialist. In

most cases, a field inventory of the potentially affected area would be completed.

- Sites evaluated as eligible for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.
- Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.
- Water quality monitoring would be conducted as required by the state on 16 miles of Burro, Francis, and Hot Springs study areas designated by the state as unique waters.
- Up to 36 new upland water sources would be developed for grazing management in seven river study areas according to management provisions for areas of critical environmental concern.

NO ACTION ALTERNATIVE

Under the no action alternative current management practices would continue. The no action alternative would not affect existing wilderness areas, areas of critical environmental concern, riparian national conservation areas, or resource management plan management procedures and policies.

Management actions

Wild and Scenic River management actions

The no action alternative determines all the 20 eligible river areas to be nonsuitable for designation. There would be no wild and scenic river management actions under the no action alternative.

Ongoing management actions

The ongoing management actions listed below are currently in effect and would continue to be employed after a Congressional designation decision. The actions are provisions in wilderness area management plans, riparian national conservation plans, resource management plans and area of critical environmental concern plans.

- Approved plans of operation would be required for all mining related activities above the level of casual use, as defined at 43 CFR 3809.0-5, which are conducted under the authority of the General Mining Law of 1872.
- Mineral leases would have stipulations for no surface occupancy in 13 study areas covering 33,709 acres as identified in resource management plans and management prescriptions for areas of critical environmental concern.
- Mineral entry, leasing, and materials sales would be recommended for withdrawal on 11,349 acres on seven river segments in accordance with management provisions in areas of critical environmental concern. (This excludes 3,200 acres in the Cienega Creek study area which has never been open to mineral entry.)
- Up to 20,033 acres in riparian areas would be acquired on a willing seller-willing buyer basis or by exchange, according to management plans in riparian national conservation areas, areas of critical environmental concern and resource management plans.
- Nearly 42 miles of roads would be closed in four study areas in accordance with management provisions in areas of critical environmental concern.
- New road development would be prohibited within 1/2 mile of a bald eagle nest in accordance with management provisions in five

areas of critical environmental concern (7,968 acres).

- Camping would be restricted to a 14-day limit in riparian zones in 17 study areas according to quidance in resource management plans.
- Camping would be restricted to fewer than 14-days in the riparian zones of three rivers in compliance with riparian national conservation plans and wilderness management plans.
- Campground development would be restricted to areas outside riparian zones and the 100-year floodplain in six study areas (11,538 acres), in compliance with stipulations for areas of critical environmental concern management plans.
- Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in five riparian areas covering 7,968 acres, according to management plans in areas of critical environmental concern.
- Off highway vehicle use would be limited to existing roads and trails on 19,163 acres of 10 study areas according to requirements in area of critical environmental concern management plans.
- Helicopter flights would be prohibited over five study areas 27,155 acres) on the basis of management requirements in areas of critical environmental concerns
- Erosion control structures (stabilization, diversions) would be developed on approximately 40 riparian miles in two study areas in accordance with management provisions in riparian national conservation areas and resource management plans.
- Cottonwood and willow planting would occur on up to 2,550 acres in four study areas in compliance with area of critical environmental

concern management plans.

- Woodcutting would be prohibited on 19,294 acres in four study areas as provided in area of critical environmental concern management plans.
- Wood collection would be restricted to down and dead materials in two study areas (7,776 acres) in accordance with area of critical environmental concern management provisions.
- Wood collection would be prohibited on 13,096 acres in two study areas according to provisions in resource management plans.
- Removal of native plants would be prohibited in 7,400 acres of five study areas in compliance with area of critical environmental concern management plans.
- Requirements to locate campgrounds and picnic areas away from riparian zones would occur in five river study areas (7,968 acres) on the basis of provisions in areas of critical environmental concern management plans.
- Actions to eliminate exotic fish would be implemented on about 70 riparian miles in four river study areas as provided by area of critical environmental concern management plans.
- Approximately 5,450 acres of salt cedar would be removed within five study areas according to provisions in area of critical environmental concern and resource management plans.
- Approximately 28 miles of fencing that includes exclosures would be developed in

- riparian areas in four study areas (14,454 acres) according to management provisions for riparian national conservation areas and a resource management plan.
- Proposed activities that could result in increased use or surface disturbance in 20 study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed.
- Sites evaluated as eligible for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.
- Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.
- Water quality monitoring would be conducted as required by the State on nearly 85 riparian miles of nine rivers designated by the State as unique waters.
- Up to 36 new upland water sources would be developed for grazing management in nine study areas according to management provisions for areas of critical environmental concern.

TABLE 2-IMP SUMMARY OF IMPACTS BY ALTERNATIVE

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ISSUE	RECOMMENDED ALTERNATIVE	ALL SUITABLE	LEGISLATIVE PROTECTION	NO ACTION
Outstandingly Remarkable Scenic Values	Beneficial impact from long-term legislative protection on 67,130 acras; No Wild and Scenic River Act protection for 20,340 acres	Beneficial impact from long- term legislative protection on 87,489 acres	Beneficial impact from long-term legislative protection on 34,011 acres; No Wild and Scenic River Act protection for 53,478 acres	No long-term legislative protection on 87,489 acres
Outstandingly Remarkable Recreational Values	Beneficial impact from long-term legislative protection on 54,810 acres;No Wild and Scenic River Act protection for 3,950 acres	Beneticial impact from long- term legislative protection on 58,803 acres	Beneficial impact from long-term legislative protection on 15,071 acres; No Wild and Scenic River Act protection for 43,732 acres	No long-term legislative protection on 59,803 acres
Outstandingly Remarkable Gaologic Values	Beneficial impact from long-term legislative protection on 17,870 acres; No Wild and Scenic River Act protection for 424 acres	Beneficial impact from long- term legislative protection on 18,294 acres	Beneficial impact from long-term legislative protection on 3,244 ecres; No Wild and Scenic River Act protection for 15,050 acres	No long-term legislative protection on 18,294 acres
Outstandingly Remarkable Fish and Wildlife Habitat and Aquetic Habitat Values	Beneficial impact from long-term legislative protection on 72,160 acras; No Wild and Scenic River Act protection for 30,300 acres	Beneficial impact from long- term legislative protection on 102,480 acres	Benaficial impact from long-term legislative protection on 41,942 acres; No Wild and Scenic River Act protection for 60,518 acres	No long-term legislative protection on 102,460 acres
Outstandingly Remarkable Cultural, Historic, and Palaontological Values	Beneficial impact from long-term legislative protection on 45,656 acres; No Wild and Scenic River Act protection for 9,595 acres	Beneficial impact from long- term legislative protection on 55,251 acres	Beneficial impact from long-term legislative protection on 20,775 acres; No Wild and Scenic River Act protection for 34,476 acres	No long-term legislative protection on 55,251 acres
Outstandingly Remarkable Hydrologic Values	Beneficial impact from long-term legislative protection on 6,910 ecres; No Wild and Scenic River Act protection for 434 acres	Beneficial impact from long- term legislative protection on 9,344 acres	Beneficial impact from long-term legislative protection on 3,244 acres; No Wild and Scenic River Act protection for 9,344 acres	No long-term legislative protection on 9,344 acres
Minerals Development	Long-term edverse Impact from Withdrawal of 2,830 acres of moderate to high potential, 4,360 of moderate potential and 1,240 acres of low-to- moderate potential in segments designated Wild	Long-term adverse Impact from Withdrawal of 2,830 acres of moderate-to-high potential, 5,320 acres of moderate potential, and 2,457 acres of low-to- moderate potential in segments designated Wild	Long-term adverse Impact from Withdrawal of 2,830 acres of moderate-to-high potential, 5,550 acres of moderate potential, 1,040 acres of low-to-moderate potential and 1,410 acres of low in segments designated Wild	No adverse impact
Tourism and Travel	No Adverse Impacts; indirect beneficial impacts for Graham and Greenlee Counties	No Adverse Impacts; indirect beneficiel impacts for Graham and Greenlee Counties	No Adverse Impacts; indirect beneficial impacts for Grahem and Greenlee Counties	No Adverse Impacts

CHAPTER 3 AFFECTED ENVIRONMENT

INTRODUCTION

This chapter focuses on selected resources in the 20 eligible river study areas. The purpose of the chapter is to identify resources that could be impacted by implementation of the recommended alternative and other alternatives described in Chapter 2.

Although all resources have been considered in the wild and scenic river evaluation process, only those relevant to the issues identified in Chapter 1 and the impacts addressed in Chapter 4 are discussed. Currently the eligible rivers are protected by special management. In

this chapter the resources are described as they would be managed without the special protection for the rivers.

GENERAL ENVIRONMENT

Table 3-1 displays the river study areas administered by the Bureau of Land Management, public land acres by office management area, and total acres. As shown in Table 1-6, the river study areas are in 11 of the 15 Arizona counties: Coconino, Cochise, Glla, Graham, Greenlee, La Paz, Marlcopa, Mohave, Yavapai, Pima, and Pinal.

TABLE 3-1 RIVERS BY DISTRICT AND RESOURCE AREA

RIVER AREA	DISTRICT AND RESOURCE AREA (RA)	BLM PUBLIC LAND ACRES	TOTAL RIVER STUDY AREA ACRES
Agua Fria*	Phoenix District/Phoenix RA	6,710	7,160
Aravaipa*	Safford District/Gila RA	3,200	3,200
Big Sandy*	Phoenix District/Kingman RA	4,220	8,730
Bill Williams*	Yuma District/Havasu RA	4,650	6,617
Bonita Creek*	Safford District/Gila RA	3,570	4,540
Burro Creek*	Phoenix District/Kingman RA	9,460	15,650
Cienega Creek*	Safford District/Tucson RA	3,200	3,360
Francis Creek	Phoenix District/Kingman RA	1,360	3,560
Gila Box*	Safford District/Gila RA	7,460	7,960
Наввауатра	Phoenix District/Phoenix RA	6,386	9,990
Hot Springs	Safford District/Tucson RA	1,600	1,920
Lower San Francisco*	Safford District/Gila RA	1,874	2,464
Middle Gila*	Phoenix District/Phoenix RA District	6,130	8,515
Paria*	Arizona Strip District/Vermilion RA	6,960	8,960
San Pedro*	Safford District/Tucson RA	12,266	14,720
Santa Maria*	Phoenix District/Kingman RA	7,080	12,000
Swamp Springs	Safford District/Tucson RA	640	800
Turkey Creek	Safford District/Gila RA	1,100	1,100
Virgin*	Arizona Strip District/Shivwits RA	9,344	11,040
Wright Creek	Phoenix District/Kingman RA	3,861	4,032

^{* =} Recommended alternative; RA = Resource Area

The study areas are located in three physiographic provinces: Paria River and Wright Creek are in the Colorado Plateau province; Burro Creek and the Aqua Fria River are in the

Central Mountains province; and the rest are in the Basin and Range province. Table 3-2 provides details.

TABLE 3-2 BAILEY AND KUCHLER POTENTIAL NATURAL VEGETATION AND ECOREGIONS OF THE UNITED STATES

	ECONEGIONS OF TH	IL OITH				
RIVER STUDY AREA	ECOREGION PROVINCE	PNV 1	PNV 2	PNV 3	PN∨ 4	PNV 5
Agua Fria	Palouse Grassland	JPW	OJW ROMM	APF	GTSS	
Aravaipa	Mexican Highland Shrub Steppe	GTSS	OJW MMOS	PDFF	CBBS	
Big Sandy	American Desert	CBBS	PVCS			
Bill Williams	American Desert	CBBS	PVCS			
Bonita Creek	Mexican Highland Shrub Steppe	GTSS	OJW	CBBS		
Burro Creek	American Desert Palouse Grassland	CBBS	PVCS	GTSS	oJW MMOS	APF
Cienega Creek	Mexican Highland Shrub Steppe	GTSS	OJW	PDFF	<u> </u>	
Francis Creek	Palouse Grassiand	GTSS	onw	OJW MMOS	APF	
Gila Box	Mexican Highland Shrub Steppe	CBBS	GTSS	OJW	PDFF	
Hassayampa	. Palousse Grassiand	GTSS	OJW BOMM	APF		
Hot Springs	Mexican Highland Shrub Steppe	GTSS	oJW	PDFF		
Lower San Francisco	Mexican Highland Shrub Steppe	CBBS	GTSS	onw		
Middle Gila	Mexican Highland Shrub Steppe	CBBS	GTSS	oJW		
Paria	Intermountain Sagebrush	GBS	ggs	JPW		
San Pedro	Mexican Highland Shrub Steppe	GTSS	OJW	PDFF		
Santa Maria	Palouse Grassland American Desert	CBBS	PVCS	GTSS	OJW MMOS	APF
Swamp Springs	Mexican Highland Shrub Steppe	GTSS	oJW	PDFF		
Turkey Creek	Mexican Highland Shrub Steppe	GTSS	SOMW OJW	POFF	:	
Wright Creek	Palouse Grassland	JPW	GTSS	OJW MMOS		
Virgin	American Desert	СВ				

PNV= Potential Natural Vegetation PDFF= Pine Dougles Fir Forest

OJW= Oak Juniper Woodland GTSS= Grama Tobosa Shrub Steppe

PVCS = Palo Verde Cactus Shrub

CB = Creosote Bush

APF = Arizona Pine Forest

JPW = Juniper Pinyon Woodland

MMOS = Mountain Mahogany Oak Scrub

CBBS = Creosote Bush Bursage GGS = Grama Gaileta Steppe

GBS = Oreat Basin Sagebrush

OUTSTANDINGLY REMARKABLE VALUES

Table 1-1 in Chapter 1 displays the range of outstandingly remarkable values identified in the eligibility studies for each of the 20 rivers.

Outstandingly Remarkable Scenic Values

Fifteen of the wild and scenic river study areas possess outstandingly remarkable scenic values.

The outstandingly remarkable scenic values are varied. They include undisturbed panoramas with diverse landforms composed of canyons, mountain slopes, rolling hills, and the broad river channels. Pristine canyons and gorges provide exceptional aesthetic experiences.

Rugged mountains, rocky canyons, and imposing cliff faces provide exceptional opportunities for sightseeing and photography. Riparian forests and heavy stands of vegetation offer sharp contrasts in areas where the surrounding vegetation is dominated by desert shrubs. In areas with perennial waters, the riparian vegetation creates a dramatic green belt that magnifies the overall scenic quality of the area.

Outstandingly Remarkable Recreational Values

Nine of the 20 river study areas contain outstandingly remarkable recreational values. The river study areas provide opportunities for primitive outdoor recreation in which local and regional residents as well as tourists from around the country and world participate. The outstandingly remarkable recreational values include opportunities for hiking, backpacking camping, horseback riding, sightseeing, wildlife observation, hunting, fishing, photography, off highway vehicle use, rockclimbing, swimming, rafting, kayaking, canoeing, and geologic, ecologic, and cultural resource observation and interpretation.

The rivers are either the basis of recreation activities (floating, swimming, fishing) or

contribute to the quality and intensity of an activity (riparian areas provide excellent hiking and camping opportunities as well as wildlife habitat for wildlife observations and hunting). Dramatic canyons such as the Paria, Burro Creek, and the Gila Box provide uncommon opportunities for photographic and artistic projects. Cultural and historic resources in the study areas also attract visitors.

Outstandingly Remarkable Fish and Wildlife and Aquatic Habitat Values

Fish and wildlife habitat was identified as an outstandingly remarkable value in all of the 20 river study areas. Outstandingly remarkable aquatic habitat values were identified in one river study area.

The outstanding value of the habitat is intrinsically associated with the fish and wildlife populations it supports. A variety of special status species, species listed by the U.S. Fish and Wildlife Service or the Arizona Game and Fish Department as threatened or endangered, Category 1 and 2 species, and sensitive species are found in the river study area (see Table 3-7).

Outstandingly Remarkable Cultural Resource, Historical, and Paleontological Values

Nine of the 18 study areas contain prehistoric and historic archaeological sites and are regarded as having outstandingly remarkable cultural resource values. These nine areas, distributed throughout Arizona, are indicated in Table 3-9. Prehistoric sites are present in all of the areas; six contain historic sites. It is likely that all 20 study areas contain sites of sufficient scientific potential or historic importance to be eligible for nomination to the National Register of Historic Places. The nine study areas having outstandingly remarkable cultural resource values contain sifes regarded as rare or exceptionally important in terms of historic significance, scientific informational potential, or geographic location.

Sites currently listed on the National Register

include the Perry Mesa Archaeological District along the Agua Fria River, the General Kearny campsite overlooking the Gila Box, and the Lehner Mammoth Kill Site along the San Pedro River. The Lehner site also is a National Historic Landmark. Sites along the San Pedro River are widely regarded as among the oldest and most important Paleo-Indian manifestations in North America. At the Lehner and Murray Springs sites, occupied about 9,000 B.C., bones of extinct Pleistocene mammoths were found in association with human artifacts.

In addition to the bones of extinct Pleistocene animals associated with archaeological sites, the San Pedro study area contains other significant paleontological resources, including late Cenozoic fossils which are one to five million years old. The San Pedro study area holds the remains of Santa Cruz de Terranate, a Spanish presidio that served as an outpost in battles with the Apache. These types of sites are quite rare in Arizona.

Examples of the outstandingly remarkable cultural resources in other study areas include the Beale Wagon Road near Wright Creek, established in the 1850s as the first road across northern Arizona; Pueblo Duval near Bonlta Creek, a rare Anasazi ruin in Mogolion country; pueblos with walls eight feet high near upper Burro Creek, representing the westernmost extension of the prehistoric Prescott culture; and pueblos at the edges of the Agua Fria River Canyon and its tributaries.

Outstandingly remarkable cultural resource values in nine of the study areas are rare and significant, but nonetheless threatened by damage from erosion and by human activities such as vandalism and off-road vehicle traffic.

Outstandingly Remarkable Geologic Values

Outstandingly remarkable geologic values are found in three of the 20 river study areas.

This category includes river areas with colorful volcanic and obsidian deposits. Striking geologic uplifts and associated faulting with steeply tilted limestone formations, and deeply incised narrow canyons and gorges characterize geologic values in some of the study areas.

Outstandingly Remarkable Hydrologic Values

Two study areas have outstandingly remarkable hydrologic values. Water quality is a basic factor in identifying an outstandingly remarkable aquatic value. Perennial water flow in a desert environment is a primary factor in assessing outstandingly remarkable hydrologic values.

MINERALS DEVELOPMENT AND POTENTIAL

Many of the 20 eligible study areas have produced, or have the potential to yield, locatable minerals.

Table 3-3 describes the known locatable mineral potential of the 40 eligible segments within the study areas. A total of 103,000 acres is covered by the river study areas. Twenty-three river segments, incorporating a total of approximately 51,600 acres, are considered to have either no mineral potential or a low mineral potential. Twelve segments, incorporating a total of approximately 42,810 acres, are estimated to have a low to moderate or moderate mineral potential. Five segments, incorporating an approximate total of 9,646 acres, are classified as having a moderate to high, or high mineral potential. In one segment (8,960 acres) the locatable mineral potential ranges from low to high.

No large commercial mining operations currently exist within the river study areas. Large open-pit copper mines operate in the vicinity of the Lower San Francisco River, the Middle Gila River, and Burro Creek. Copper mining also occurred historically along the Bill

Williams River. Mines producing primarily gold or silver have existed along the Hassayampa, Agua Fria, Big Sandy, Santa Maria, and San Pedro rivers. Molybdenum, manganese, lead, zinc, and uranium are among the locatable minerals that have been produced within or near the study areas.

TABLE 3-3
LOCATABLE MINERAL POTENTIAL BY ELIGIBLE RIVER SEGMENT

WILD AND SCENIC RIVER STUDY AREA	SEGMENT 1	SEGMENT 2	SEGMENT 3	SEGMENT 4	SEGMENT 5
AGUA FRIA	L(1390ac)	M(5320ac)			
ARAVAIPA	L(3200ac)				
BIG SANDY	L/M(2030ac)	L/M(2190ac)			
BILL WILLIAMS	L/M(2992ac)	N(610ac)	N(1547ac)		
BONITA CREEK	N/L(3570ac)		,		
BURRO CREEK	L(1190ac)	L/M(2750ac)	H(630ac)	M/H(2630ac)	M(2260ac)
CIENEGA CREEK	N(1280ac)	N(1920ac)			
FRANCIS CREEK	L(1360ac)				
GILA BOX	L(1940ac)	L(4250ac)	N/L(1270ac)		
HASSAYAMPA	M/H(250ac)	M/H(3246ac)	M/H(2890ac)		"
HOT SPRINGS	N(1600ac)				
LOWER SAN FRANCISCO	L(1134ac)	L(740ac)			
MIDDLE GILA	M(580ac)	M(2630ac)	M(2920ac)	_	
PARIA	L/H(8960ac)				
SAN PEDRO	L/M(12256ac)				
SANTA MARIA	L/M(5310ac)	L/M(770ac)			
SWAMP SPRINGS	N(640ac)				
TURKEY CREEK	L(1100ac)				
VIRGIN	L(928ac)	L(2336ac)	L(2368ac)	L(3712ac)	
WRIGHT CREEK	L(3816ac)			···	

Key: N= None;L= Low; M= Moderate; H= High

Table 3-4 displays the acreage currently withdrawn from mineral entry in the 20 eligible river study areas. Withdrawn acres include those lands closed to new mining claims by legislative decree or administrative action. Other acres include areas on non-federal lands,

as well as public lands that remain open to mineral entry. The data show that approximately 50,000 acres have been withdrawn from mineral entry in the 20 eligible river study areas. This represents about 48 percent of the total acreage.

TABLE 3-4
WILD AND SCENIC RIVER AREAS LOCATABLE MINERALS BY ACREAGE

RIVER AREA	POTENTIAL PUBLIC LAND ACRES	WITHDRAWN ACRES
Agua Fria*	6,710	o
Aravaipa*	3,200	3,200
Big Sandy*	4,220	2,583
Bil) Williams*	5,650	4,164
Bonita Creek*	3,570	3,570
Burng Creek*	9,460	3,223
Clenega Creek*	3,200	
Francia Creek	1,360	460
Gila Box*	7,460	7,460
Hassayampa	6,386	3,526
Hot Springs	1,600	0
Lower San Francisco *	1,874	40
Middle Gila*	6,130	2,240
Paria*	8,960	8,960
San Pedro*	12,256	12,256
Santa Maria*	7,080	4,270
Swamp Springs	640	640
Turkey Creek	1,100	370
Virgin *	9,344	5,008
Wright Creek	3,861	3,861
TOTALS	103,560	50021

= Recommended Alternative

None of the river study areas has more than a low potential for leasable mineral development. Hot springs, with a geothermal potential, exist near Burro Creek, the Gila Box, and Hot Springs Canyon, but no plans or efforts have been made toward development of these energy sources.

PUBLIC LANDS RESOURCES

Table 3-5 shows existing rights-of-way and utility corridors in the river study areas. Three study areas have major designated utility corridors within their boundaries. Two corridors cross

Burro Creek and one passes through the Big Sandy Wild and Scenic River study area.

Future corridor needs for high voltage power transmission lines are somewhat indistinct. Major variables include uncertain growth of regional electric demand; variable projections of surplus electric generation; opportunities to upgrade carrying capacity of existing lines; parallel line installation within existing corridors; and potential new line locations entirely outside of Arizona.

Two major access corridors pass through the

river study areas. Interstate I-15 parallels, and at times crosses, the Virgin River in segments 2 and 3. U.S. Highway 93 crosses Burro Creek between segments 4 and 5, and crosses the Santa Maria River study area between segments 1 and 2. The Arizona Department of Transportation plans to widen U.S. Highway 93 through the Burro Creek study area to improve traffic flow and safety, and the department also is considering the feasibility of upgrading the highway to an interstate to provide a major route between Phoenix and Las Vegas.

The 20 river study areas contain numerous minor rights-of-way for small utility powerlines, local roads, and in the case of Bonita Creek, a water collection system for the city of Safford, Arizona.

No communication facility sites exist in any of the wild and scenic river study areas. Due to the geographic and topographic aspects of the study areas, no new sites have been proposed.

TABLE 3-5
WILD AND SCENIC RIVER AREAS LANDS ACTIONS

RIVER STUDY AREA	TRANSPORTA- TION CROSSING	TRANSPORTA- TION PARALLEL	UTILITY CROSSING	UTILITY PARALLEL	WATER DEVELOP- MENT	OTHER
Agua Fria*	R	R	E	-	DIV	WELL
Aravaipa*	-	-		-	-	FB (P)
Big Sandy*	R		G, E	-	-	WELLS
Bill Williams*	R	R	G,E,E-(P)	-	-	•
Bonita Creek*	R	R	-	w	DIV	FB (P)
Burro Creek*	R, H		W,E,G	-		•
Cienega Creek*	R	R	E	-	-	•
Francie Creek	я	R		W, G	DIV	•
Gile Box*	R	R	W,E,T	-	DIV	-
Hassayampa	Ŕ	R	E	•	-	-
Hot Springe	-	-	-	-	-	•
Lower San Francisco*	-	-	E	-	-	
Middle Gile*	R	н	E	Ε	-	<u>.</u>
Peria*	-	•				-
San Pedro*	н	RR,R	G,W,E,T	-	DIV	-
Santa Maria*	н	R	•		-	•
Swamp Springs		•	-	-	-	-
Turkey Creek	R	А	•	-		WELL
Virgin*	I, R	I,H,R	£	•	DIV	FB(P)
Wright Creek	R	-	-	•		•

- Recommended Alternative

R- Road; H- Highway; I= Interestate; G= Gas Pipeline, W= Water Pipeline; E- Electrical Transmission Line; T= Telephone Line; DIV = Water Diversion; FB = Fish Barrier, (P) = Proposed

RECREATION

A wide variety of recreational opportunities exists in the river study areas. The primary types are shown in Table 3-6. Use of these areas is also widely varied. Visitor totals range from fewer than 100 to more than 50,000 visitor use days per year.

The presence of water is either essential to the recreation value (activities such as rafting and fishing) or increases the quality, intensity, or value of an activity Riparian areas provide excellent hiking and camping opportunities as well as wildlife habitat for wildlife observations and hunting.

There are developed campgrounds on the Burro Creek and the Virgin and San Pedro rivers. Additional facilities at these and other rivers provide camping facilities, visitor services such as restrooms and picnic tables, and information regarding the variety of resources and recreational opportunities available in each area.

Motorized off-highway vehicle use occurs outside of wilderness areas. Off-highway vehicle use is limited to existing roads and trails or to designated roads and trails in most special management areas; some areas have been closed to motorized vehicles.

TABLE 3-6 WILD AND SCENIC RIVER AREAS: RECREATION AND TOURISM

			<u> </u>		10,7110117111			
RIVER STUDY AREA	VISITOR USE DAYS ANNUAL TOTAL USE	HIKE/ BACKPACK	FLOAT	HUNTING AND FISHING	CAMPING/ PICNICKING	NATURE OBSER- VATION	ону	OTHER?
Agua Fria¹	1,500	Υ	٧	н	ΥΥ	Υ	٧	Υ
Aravaipa ¹	> 15,000	٧	N	н	Y	٧	N	Υ
Big Sandy¹	2,500	Υ	N	н	N	Y	N	Y
Bill Williams¹	< 2,500	Y	Υ	Y	Y	Y	٧	Y
Bonita Craek¹	15,000	Υ	N	н	Y	٧	Y	. Y
Burro Creek ¹	> 20,000	Υ	N	н	Y	Υ	Y	Y
Cienega Creek ¹	> 2,500	Y	N	н	Y	Υ	Y	Υ
Francis Creek	<1,000	Υ	N	н	Y	Y	Y	Y
Gila Box¹	4,000	Y	Υ	Υ	Y	Y	Y	Y
Hassayampa	1,200	Υ	N	н	Y	Υ	Y	Y
Hot Springs	1,750	Y	N	н	Υ	٧	N	Υ
Lower San Francisco ¹	>1,000	Y	Y	Y	Y	Y	Y	Y
Middle Gîla¹	1,500	N	Υ	Υ	Υ	Υ	N	Υ
Paria ¹	5,300	Y	N	н	N	Y	N	Y
San Pedro¹	> 50,000	Y	N	Y	Y	٧	Υ	Υ
Santa Maria¹	< 2,000	Y	N	н	Υ	٧	Y	Υ
Swamp Springs	<100	Υ	N .	Y	Y	Y	8	Y
Turkey Creek ¹	1,200	Υ	N	н	Y	Y	Υ	Y
Virgin¹	7,600	Υ	Υ	Υ	Y	Υ	Y	Y
Wright Creek	<500	N	N	Н	N	N	Υ	N

Key: 1 - Recommended alternative; 2 - Includes equestrian activities, rockhounding, goldpanning, rockclimbing, spelunking Y = Activity occurs on this river; N = Activity is not known to occur on this river; H = Hunting only; F = Fishing Only

FISH AND WILDLIFE

The river study areas in Arizona support a variety of wildlife, many of which ere economically important. These areas also provide habitat for species that have been listed or are proposed for listing as threatened or endangered by the U.S. Fish and Wildlife Service under the Endangered Species Act. The Endangered Species Act requires federal agencies to use their authority to conserve these species and the habitats upon which they depend. Many other species are candidates for federal listing, an indication that the Fish and Wildlife Service has reason to believe the species may be in need of listing, or that more information is needed to make a determination. Bureau of Land Management policy requires that the habitat must be managed for these species so that they will not be federally listed.

Table 3-7 lists the federal special status species (threatened, endengered, proposed, and candidate) known to use habitat within the river study areas. These special status species receive special management attention because

they have been listed by the U.S. Fish and Wildlife Service or the Arizona Game and Fish Department as threatened or endangered with extinction throughout all or part of their habitat range.

The state maintains a list of threatened native wildlife species, many of which depend to some extent on these study areas; most are also federally listed or are federal candidates. Because of overlapping designations, they are not included in Table 3-7. Most of these species have declined in range or numbers due to alterations to their habitat. Such alterations include changes in streamflow quantity, timing, or duration, changes in erosion (including bank-cutting), and changes in the plant communities supported by the rivers. Changes in plant communities include invasion of exotic trees such as salt cedar and loss of native shrubs and trees such as cottonwoods and willows.

The study rivers support a variety of native fish species, some of which are federally listed as threatened or endangered. These are identified on Table 3-7.

TABLE 3-7 RIVER AREAS: ENDANGERED, THREATENED, AND CATEGORY SPECIES

Endangered

American peregrine falcon (Falco peregrinus anatum)

Bald eagle (Haliaeetus leucocephalus)

Gila topminnow (Poscillopsis occidentalis occidentalis)

Humpback chub (Gila cypha)

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)

Rezorback sucker (Xyrauchin texanus) with proposed critical habitat

Virgin River chub (Gila seminuda)

Woundfin (Plagopterus argentissimus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Threatened

Desert tortoise (Mojave population) (Gopherus agassizii)

Loach minnow (Tlaroga cobitis)

Spikedace (Meda fulgida)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasillanum cactorum)

Huachuca water umbei (Lilacopsis schaffneriana ssp. recurva)

Candidate Category 2

Apache northern goshawk (Accipiter gentilis apache)

Aravalpa sage (Salvia amissa)

Arizona toad (Bufo microscaphus microscaphus)

California leaf-nosed bat (Macrotus californicus)

Canyon (glant) spotted whiptail (Cnemodophorus burrl)

Chincahua western harvest mouse (Reithrodontomys megaloris arizonensis)

Chiricahua leopard frog (Rana chiricahuansis)

Chuckwalla (Sauromalus obesus)

Desert tortoise (Sonoran population) (Gopherus agassizii)

Desert sucker (Catostomus ciarki)

Ferruginous hawk (Buteo regalis)

Flannelmouth sucker (Catostomus latipinnis)

Gila chub (Gila intermedia)

Greater western mastiff-bet (Eumops perotis Californicus)

Hohokam agave (Agave murpheyi)

Hualapai southern pocket gopher (Thomomys umbrinus hualapaiensis)

Loggerhead shrike (Lanius Iudovicianus)

Lowland leopard frog (Rana yavapaiensis)

Marble Canyon kangaroo rat (Dipodomys microps leucotis)

Maricopa tiger beetle (Cicindela oregona maricopa)

Mexican garter enske (Thamnophis eques)

Narrow-headed garter snake (Thamnophis ruficuncrarus)

Rosy boa (Lichanura trivirgata)

Roundtail chub (Gila robusta)

Sonora sucker (Catoatomus insignis)

Sonoran tiger salamander (Ambyetoma tigrinum etebbinsi)

Southwestern cave but (Myotis velifer brevis)

Spotted bat (Euderma maculatum)

Texas homed lizard (Phrynosoma cornatum)

Virgin spinedace (Lepidomeda mollispinis mollispinis)

Virgin thistle (Cirsium virginensis)

Western mastiff-bat (Eumops perotis)

Yavapai Arizona pocket mouse (Perognathus amplus amplus)

Source: Appendix 1: U.S. Fish and Wildlife Service Section 7 Consultation memorandum

RIPARIAN VEGETATION

Twenty river study areas were identified as eligible in Arizona Bureau of Land Management resource management plans. These study areas contain approximately 438 miles of riparlan vegetation communities; the Bureau of Land Management has administrative responsibility for 331 miles of these waterways. Riparlan vegetation makes an important contribution to stream channel stability, water quality, streamflow, fish habitat, wildlife habitat and recreation activity. Table 3-8 identifies the riparlan vegetation communities.

Native riparian vegetation communities are becoming increasingly rare in Arizona and the desert southwest. An estimated 80-90 percent of native riparian vegetation communities in Arizona has been lost or degraded in historic times. Direct clearing of riparian vegetation for agriculture, firewood, and various other

purposes, combined with streamflow modification (dams and diversions) and groundwater withdrawals are considered the primary causes for this loss and degradation. Salt cedar is invading many riparian areas causing a loss of native vegetation.

Six riparian vegetation communities are considered important and are found in the study areas. Mesquite bosques, cottonwood/willow, mixed broadleaf, wetland, riparian scrub and salt cedar communities are common communities in these riparian areas. Fourteen of the 20 study areas contain mesquite bosques. Seventeen study areas contain cottonwood/willow communities. Thirteen study areas contain mixed broadleaf communities. Six study areas contain wetlands. Nine study areas contain riparian scrub. These native communities are important remnants of Arizona riparian ecosystems. Eight of the study areas contain significant quantities of salt cedar.

TABLE 3-8
RIPARIAN VEGETATION BY WILD AND SCENIC RIVER AREA

River Study Area	Mesquite Bosque	Cottonwood Willow	Mixed Broadleaf	Wetland	Riparlan Scrub	Salt Cedar
Agua Fria*	NO	YES	YES	NO	NO	NO
Araveipa*	YES	NO	YES	NO	YES	YES
Big Sandy*	YES	YES	NO	NO	NO	YES
Bill Williams*	YES	YES	NO	NO	NO	YES
Bonita Creek*	YES	YES	YES	NO	YES	NO
Burro Creek*	YES	YES	YES	NO	NO	NO
Cienega Creek*	YES	YES	YES	YES		
Francis Creek	NO	YES	YES	NO	NO	NO
Gila Box*	YES	YES	YES	NO	YES	YES
Hassayampa	YES	YES	YES	NO	NO	
Hot Springs	YES	YES	YES	NO	NO	
Lower San Francisco*	YES	YES	NO	NO	YES	
Middle Gila*	NO	YES	NO	NO	NO	YES
Paria*	NO	YES	YES	YES	Y£S	YES
San Pedro*	YES	YES	YES	YES	YES	YES
Santa Maria*	YÉS	YES		YES	YES	YES
Swamp Springs	YES	NO	YES	NO	NO	NO
Turkey Creek	YES	NO	YES	NO	YES	
Virgin*	NO	YES	NO	YES	YES	NO
Wright Creek	NO	YES	NO	YES	NO	NO

Recommended alternative

CULTURAL RESOURCES

Prehistoric and historic archaeological sites exist along nearly all of Arizona's rivers and streams. Table 3-9 depicts the presence of cultural resources within the 20 study areas, grouped according to cultural traditions and time periods.

The Pre-ceramic period identified in Table 3-9 (before A.D. 300 in most areas of the state) refers to a time before people began to manufacture pottery. Later prehistoric cultures, from about A.D. 300 to 1500, include five major traditions: the Hohokam in the southern Arizona desert; the Mogollon and later the Salado in the mountainous areas of eastern and central Arizona; the Anasazi on the Colorado Plateau; and the Patayan in western Arizona. The Historic period in Table 3-9 includes sites occupied or used between A.D. 1500 and 1940.

As Indicated in Table 3-9, prehistoric sites have been recorded in 18 of the 20 river study areas. Undiscovered sites also may be present in the remaining two areas. Because archaeological surveys have covered very little territory, it is not possible to determine total numbers of sites in each of the 18 areas.

Prehistoric site types common to most areas include artifact scatters that represent the remains of villages, camps, and temporary work areas. Caves, rockshelters, and petroglyphs (rock art) also exist in many areas. Rock pueblo structures have been found in at least five of the study areas. Less common features include trails, canals, and ancient agricultural fields.

Historic period sites have been recorded in 11 of the 20 study areas. These include Native

American sites as well as roads, mines, and structural remains and trash associated with old homesteads and ranches. Unique sites include the Beale Road near Wright Creek, the first wagon road across northern Arlzona; the ghost town of Signal along the Big Sandy River; and Santa Cruz de Terrenate, the remains of a Spanish presidio along the San Pedro River.

As indicated on Table 3-9, the Agua Fria, Gila Box, and San Pedro River study areas contain sites or portions of districts listed on the National Register of Historic Places. These include the Perry Mesa Archaeological District, General Kearny Campsite, and the Lehner Mammoth Kill Site.

Although most sites within the river study areas have not been formally evaluated, many additional sites are probably eligible for nomination to the National Register of Historic Places by virtue of their historic significance or potential to yield scientific archaeological information. Sites along the Agua Fria River, Parla River, San Pedro River, Turkey Creek, and Bonita Creek have been the focus of recent archaeological investigations, ruins stabilization, or interpretive developments.

Sites vary in degrees of preservation. In general, those in areas of relatively high human traffic have suffered damage to the greatest degree, while those in remote or wilderness areas remain in better condition.

Many sites have been damaged by illegal excavation and artifact collecting, other types of vandalism, off-highway vehicle traffic, trampling by livestock, and soil erosion. These activities and processes continue to pose a threat to the integrity of cultural resources.

TABLE 3-9 CULTURAL RESOURCES BY WILD AND SCENIC RIVER AREA

RECORDED SITES

								1	
Wild and Scenic River Study Area	P C	AN	H	M 0	SA	PA	Н1	PALEO	NR
Agua Fria* +			х		х		х		×
Aravaipa *	х		x	х	х				
Big Sandy*						х	х		
Bill Williams*						х	х		•
Bonita Creek* +		х		×	x		x		
Burro Creek* +				:		х			-
Cienega Creek*	х		×						
Francis Creek						х			•
Gila Box +			×	х			х		x
Наввауатра			×				х		-
Hot Springs									-
Lower San Francisco* +				х	х				_
Middle Gile*			x		х		х		-
Paria* +		x					х		
San Pedro* +	х		х				х	х	х
Santa Maria*						х			
Swamp Springs									•
Turkey Creek +			х	х	х				
Virgin*	х	x					х		-
Wright Creek +						х	×		

Key: PC = PreCeramic; AN = Anasazi; HO = Hohokam; MO = Mogollon; SA = Salado; PA = Patayan; HI = Historic; PALEO = Palaeontological Site; NR = National Register listed; + = Outstandingly Remarkable Value

WATER RESOURCES

Twenty river study areas were identified as eligible in Arizona Bureau of Land Management resource management plans. These study areas contain 438 miles of free flowing rivers and streams; the Bureau of Land management has administrative responsibility for 331 of these miles. Table 3-10 identifies river study areas with these water resource values.

All twenty of the study areas have stream segments with perennial streamflow. Eight of the study areas have segments with intermittent streamflow. None of the study areas contain segments with ephemeral streamflow. Two of the study areas have perennial stream flow that is regulated by upstream dams. Average stream flow volume in these study areas ranges from 0.45 to 481 cubic feet per second. The average flow category is used simply to indicate relative differences among the rivers. The regulated flows will vary because of water releases. In the rivers with unregulated flow the variation can be extreme from year to year.

Water quality in these rivers and streams ranges from poor to unique. Unique waters are designated under state law and are of exceptionally high quality. Three study areas have poor water quality; eight have acceptable water quality; three have good water quality; three have high water quality; and three are designated as unique waters under state law. Reaches of three study areas are protected by federal reserved rights; ten are covered by both federal and State rights, and three have only

state rights claimed, and currently four have none.

Water rights for instream flows held by the Bureau of Land Management on these waterways have been acquired either through the state appropriative process or through a federal reserved right established by a Congressional Act and quantified through the state system.

The water resource values found in these study areas are essential components of healthy riparian ecosystems. High quality water resources are essential for healthy riparian vegetation, fish habitat, wildlife habitat, recreational activity, and provide water for agriculture, industry and human consumption. Water resources available for natural ecosystem function in Arizona have been diminished and degraded in historic times.

The number of miles of free flowing streams with natural flow regimes has been reduced by dams and diversions for irrigated agriculture, mining and municipal uses. Water quality has been adversely impacted by agriculture return flows, mining waste, and municipal effluent. Groundwater aquifers that underlie some streams have been pumped to the extent that they no longer support surface flow in these streams.

The eligible stream segments identified in Table 3-10 are important sources of water resources in Arizona. They are crucial refuge for native fish, wildlife, and riparian vegetation.

TABLE 3-10 WILD AND SCENIC RIVER AREAS WATER RESOURCES

RIVER STUDY AREA	REGIME	AVG. (CFS.) FLOW	STATUS (Rights)(1)	QUALITY
Agua Fria *	P&I	36.5	none	FAIR/GOOD
Aravaipa*	Р	18/25	FR/ST	нідн
Big Sandy*	P&I	78.0	FR/ST	FAIR
Bill Williams*	P (REGULATED)	153.0	FR/ST	ACCEPT
Bonita Creek*	P&I	9.3	FR/ST	UNIQUE
Burro Creek*	P&I	63.5	FR/ST	UNIQUE
Cienega Creek*	P	2.0	STATE	ACCEPT
Francis Creek	P&I	16.1	FR/ST	UNIQUE
Gila Box*	Р	481.0	FR/ST	ACCEPT
Hassayampa	P&I	24.4	FR	POOR
Hot Springs	Р	4.5	STATE	HIGH
Lower San Francisco*	Р	212.0	FR/ST	ACCEPT
Middle Gila*	P (REGULATED)	190.0	federal	ACCEPT
Parla *	Р		none	POOR
San Pedro*	Р	60/33	FR/ST	GOOD
Santa Maria*	P&I	40.0	federal	ACCEPT
Swamp	Р	0,45	FR/ST	EXCELLENT
Turkey Creek	P&I	1.5	none	ACCEPT
Virgin*	Р	236	stato	POOR
Wright Creek	Р		епоп	GOOD

^{*} Recommended alternative

P= Perennial, I= Intermittent, E= Ephemeral, FR= Federal Reserved, ST= State

⁽¹⁾ Status (water rights) pertains to specific reaches, not the entire river

LIVESTOCK GRAZING

Livestock grazing occurs in 16 of the 20 Wild and Scenic River Study Areas. Six study areas cross only one allotment and one study area crosses 10 allotments. Table 3-11 displays acreage by grazing practice within each study area and livestock improvements.

Animal Unit Months (AUMs) are allocated by allotment and have not been calculated for river study areas because each river study area generally covers only a small portion of the allotment through which it passes. However, the riparian zones in the study areas provide a significant amount of livestock forage.

Eleven study areas are grazed seasonally. Seasonal grazing includes study areas with allotments on management systems such as rest rotation or deferred grazing. This category also includes study areas with allotments designated as perennial/ephemeral in which grazing is authorized when forage is available in the ephemeral portion of the allotment.

Nine river study areas have yearlong grazing. Four study areas have one or more allotments with yearlong grazing and one or more allotments with seasonal grazing. Three study areas are closed totally or partially to livestock grazing. Two study areas totally exclude grazing. The Kingman Resource Management Plan closed one allotment in the Three Rivers Area of Critical Environmental Concern to grazing in order to improve rangeland resources.

Two study areas are included in the 1987 record of decision for the Eastern Arizona Grazing Environmental Impact Statement which prescribed the suspension of livestock grazing in two allotments to allow the recovery of riparlan areas, and to improve important wildlife habitat and watershed conditions. This decision was appealed and a resolution is pending. Overgrazing of riparlan zones is occurring in four study areas.

TABLE 3-11
WILD AND SCENIC RIVER AREAS LIVESTOCK GRAZING

RIVER STUDY AREA	TOTAL BLM	NON-USE	YEAR LONG	SEASONAL-P/E	EXCLUDED
	ACRES	 			
Agua Fria*	6,710	0	400	6,310	0
Aravaipa*	3,200	0	. 0	0	3,200
Big Sandy*	4,220	0	2,209	0	2,011
Bill Williams*	4,650	0	0	4,650	0
Bonita Creek*	3,570	0	338	3,232	0
Burro Creek*	9,460	0	8,124	1,336	0
Clenega Creok*	3,200	0	3,200	0	0
Francis Creek	1,360	0	1,360	o	o
Gila Box*	7,460	0	1,415	6,045	0
Hassayampa	6,386	0	2,180	4,206	0
Hot Springs	1,600	1,600	o	0	0
Lower San Francisco*	1,874	О	919	955	0
Middle Gila*	6,130	0	o	6,130	0
Parla*	8,960	0	0	8,960	o
San Pedro *	12,256	•	•	•	12,256
Santa Maria*	7,080	•	•	7060	•
Swamp Springs	640	840	o	0	0
Turkey Creek	1,100	0	0	0	1,100
Virgin •	9,344	0	0	9,344	0
Wright Creek	3,861	0	٥	3,861	0

* Recommended alternative

Key: P/E = Perennial/Ephemeral

POPULATION AND LOCAL ECONOMY

Arizona maintained a strong population growth during the 1980s. The state grew by nearly one million people in the ten year period from 1980 to 1990.

Most of the counties containing all or portions of the river study areas experienced rapid

population increases. The metropolitan Marlcopa and Pima counties and three of the nonmetropolitan conties (Mohave, Yavapai, and Cochise) grew by more than ten percent. The growth in Graham and Pinal counties was slower. Greeniee County registered a loss due to the reduction of mining operations in the county. Table 3-12 provides details.

TABLE 3-12 ARIZONA POPULATION: 1980-1990(1)

	1980	1990	Changa
ARIZONA	2,718,546	3,665,228	946,682
APACHE	52,108	61,591	9,483
COCHISE*	85,686	97,624	11,938
COCONINO*	75,008	96,591	21,583
GILA •	37,080	40,216	3,136
GRAHAM*	22,862	26,554	3,692
GREENLEE*	11,406	8,008	-3,390
LA PAZ(2)*	12,557	13,844	1,287
MARICOPA *	1,509,176	2,122,101	612,926
MOHAVE*	65,865	93,497	37,632
OLAVAN	67,629	77,658	10,029
PIMA*	531,443	666,680	135,437
PINAL*	90,918	116,379	25,461
SANTA CRUZ	20,459	29,676	6,217
YAVAPAI*	68,145	107,714	39,569
YUMA	76,205	106,896	30,690

⁼ County with wild and scenic river study area

⁽¹⁾ The county population figures for Arizona for 1980 and 1990 as released by the U.S. Census Bureau. (2) La Paz county included in Yuma county prior to 1983.

Population by County of Residence Arizona, 1980 and 1990(1), Arizona Health Status and Vital Statistics, 1990, 137 (March 1992).

TABLE 3-13
ARIZONA POPULATION PROJECTIONS: 1994-2015

	1994	1995	2000	2010	2015
ARIZONA	4112.8	4209.9	4800.7	5940.3	9571.4
Cochise	115.4	118.4	134.2	162.8	179.6
Coconino	109.B	112.4	126,6	154.4	169.4
Gila	45.2	45.8	48.8	55.0	59.4
Graham	28.8	29.4	32.5	38.9	42.3
Greenlee	9.6	9.6	9.9	8.6	8.3
La Paz	16,2	16.5	17.8	21.1	22.8
Maricopa	2378.8	2434,9	2801	3490.4	3875.2
Mohave	103.6	107.3	126.6	167,3	169.9
Pima	775.7	773.9	877.1	1075.2	1184.6
Mosi	126	129	145.8	179.8	198.5
Yavapai	116,7	120.4	138,9	180.9	204
Yuma	106.8	108	118.6	141.6	154.7

Counties rounded to nearest 100. State total is derived by addition of rounded county totals.

Source: Arizona Revised Population Estimates: Population Projections: 1989-2040, Department of Economic Security, May 1990

TRAVEL AND TOURISM

The counties in which the river study areas are located have a variety of visitor attractions. Table 3-14 shows the average number of

visitors over an eight-year period to federal and state parks, monuments, and historical areas in those counties. Visitor use data for public lands administered by the Bureau of Land Management or Forest Service are not included.

TABLE 3-14 VISITOR STATISTICS: NATIONAL AND STATE PARKS/AREAS

COUNTY		AVG VISITORS PER	TOTAL PER	COUNTY AVG/DAY
	<u>-</u>	YEAR (1984-92)	DAY	, , , , , , , , , , , , , , , , , , ,
COCHISE	CHIRICAHUA N.M. (1)	72,764	199	206,048/565
	CORONADO N.Mem. (2)	58,523	160	
	FT. BOWIE N.H.S (2)	7,404	20	
	TOMBSTONE COURTHOUSE S.H.P. (2)	67,357	165	
COCONINO	GRAND CANYON N.P. (1)	3,662,779	10,035	7,490,862/20,523
	GLEN CANYON N.R.A. (3)	2,930,936	8,030	
	SUNSET CRATER N.M. (1)	490,451	1,344	
	WUPATKI N.M. (2)	231,204	633	
	PIPE SPRINGS (2)	37,494	103	
	WALNUT CANYON (2)	137,999	378	
GILA	TONTO N.M. (2)	68,167	187	136,226/373
	BOYCE THOMPSON ARBORETUM (1)	68,059	166	
GRAHAM	ROPÉR LAKE S.P. (3)	46,132	126	46,132/126
LA PAZ	ALAMO LAKE S.P. (PART) (3)	21,877	60	87,031/238
	BUCKSKIN MTN S.P. (3)	65,164	179	
MOHAVE	LAKE MEAD N.R.A. (3)	8,217,806	22,515	8,780,344/24,056
	LAKE HAVASU S.P. (3)	540,661	1,481	
	ALAMO LAKE S.P. (PART) (3)	21,877	60	
PINAL	CASA GRANDE RUINS N.M. (2)	167,205	458	215,072/589
	LOST DUTCHMAN S.P. (1)	43,462	119	
	MCFARLAND S.H.P (2)	4,405	12	
YAVAPAI	TUZIGOOT (2)	112,480	308	1,093,342/2,995
	MONTEZUMA CASTLE (2)	786,922	2,156	
	SLIDE ROCK S.P. (1986-1992) (3)	21,386	59	
	FT. VERDE S.H.P. (2)	30,293	63	
	JEROME S.H.P. (2)	102,845	282	
	DEAD HORSE RANCH S.P. (1)	39,416	108	

Excludes Maricopa and Pima Counties

Key: N.P. = National Park; N.M. = National Monument; N.H.S. = National Historic Site; S.P. = State Park; N. Mem. National Memorial; S.H.P. = State Historical Park; (1) = Scenic; (2) = Historic; (3) = Water-based

Sources: Arizona State Parks Board; University of Arizona Economic and Business Research Program

Bureau of Land Management, 1994

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter contains an analysis of the environmental consequences of the statewide alternatives described in Chapter 2. Any substantive changes in the affected environment caused by implementing the alternatives are regarded as impacts.

If a resource described in Chapter 3 (Affected Environment) is not changed by implementing an alternative, or if the impact is not critical or permanent, it is not discussed. For example, there would be no surface disturbance activities, and particulates would not be released into the atmosphere; thus air quality would not be affected. There would be no new developments producing or consuming energy; thus energy use will not be discussed. There would be no effects on the climate or topography. The implementation of the alternatives would not affect fire management, wild burro management, or desert tortoise habitat management. Impacts on individual wild and scenic river study areas are discussed in the River Appendix (Volume 2).

Methodology

The focus of this environmental impact statement is on the impacts that would result from implementing the alternatives determining suitability and recommending designation or determining nonsuitability and not recommending designation for all, portions, or none of the eligible river segments. The alternatives were developed in response to issues associated with protecting outstandingly remarkable values through wild and scenic river designation.

However, wild and scenic river designation or nondesignation would not occur in a vacuum or in isolation. As mentioned in Chapter 1, the Arizona Bureau of Land Management currently is administering a number of plans that preserve and protect riparian areas. For example, actions under the riparian national conservation areas and the wilderness areas provide protection for riparian zones. Similarly, management of the riparian areas of critical environmental concern includes protective measures for riparian areas.

An analysis of the impacts of wild and scenic river designation, therefore, cannot be separated from these ongoing plans and management actions. In the impact analysis of each alternative, an effort has been made to consider how the ongoing actions would affect and be affected by the implementation of the alternatives. The method of analysis centers on the combination of rivers and the total acreage involved in each issue addressed in this environmental impact statement.

Assumptions

The assumptions used for the analysis of impacts include the following.

- 1. All management actions would comply with appropriate laws, regulations and policies.
- The implementation of each alternative would involve a fully funded and staffed administrative office.
- 3. The period of analysis for this project is 20 years. Short-term impacts are those occurring within five years of implementation.
- 4. Direct effects are caused by the activity and occur at the same time and place. Indirect effects are caused by the action but are later in time or farther removed in distance.
- 5. Ongoing management actions described in Chapter 2 would continue to be implemented under all the alternatives.

- 6. Designation as a Wild, Scenic, or Recreational river would not affect existing, valid water rights. The Wild and Scenic Rivers Act creates a federal reserved water right for a quantity of water sufficient to meet the purposes of the act on designated river segments. The Bureau of Land Management would have the responsibility to preserve each designated segment in its free-flowing condition to protect its outstandingly remarkable values. The quantity of water necessary to fulfill that responsibility would be determined through assessments of instream flow needs.
- 7. A new federal reserved water right asserted by a wild and scenic river designation would be junior to all valid and existing rights. This action would have no impact on existing water rights either upstream or downstream because it would be junior to any existing right.
- 8. In addition, the Bureau of Land Management would seek to acquire other means of protection through the purchase, on a willing seller-willing buyer basis, of water rights, land exchanges, negotiated agreements, or other appropriate arrangements.
- Management plans would be developed in compliance with the National Environmental Policy Act for any Congressionally designated Wild and Scenic River.
- 10. Where data are limited, the analysis infers environmental consequences using knowledge of the area and professional expertise and judgment based on observation and analysis of conditions and responses in other areas.

IMPACTS FROM IMPLEMENTING THE RECOMMENDED ALTERNATIVE

This alternative determines suitability and recommends Congressional designation for all or parts of 14 eligible rivers (29 segments) covering 74,960 acres into the National Wild and Scenic Rivers System. Six river study areas (11 river segments) of the eligible study areas

are determined to be nonsuitable. These river study areas total approximately 27,000 acres.

There are two types of management actions in this alternative. Wild and scenic river management actions implement recommended wild and scenic river designations. The other type is the ongoing management actions described in Chapter 2. These ongoing management actions are associated with wilderness areas, riparian national conservation areas, areas of critical environmental concern, and resource management plans, and would supplement the protection provided by wild and scenic river designations. The impacts of a nonsuitable designation are analyzed along with the impacts of a suitability designation.

Outstandingly Remarkable Values

Under the recommended alternative the outstandingly remarkable values in 14 river study areas (29 segments) recommended as suitable for designation would receive long-term protection under the Wild and Scenic Rivers Act. Six river study areas (11 river segments) are recommended as nonsultable for designation and the outstandingly remarkable values would not receive legislative protection under the Wild and Scenic Rivers Act.

Impacts on Outstandingly Remarkable Scenic Values

Outstandingly remarkable scenic values were identified in 14 of the 20 eligible wild and scenic river study areas.

Implementation of the recommended alternative would protect the outstandingly remarkable scenic values in 12 areas (24 segments) encompassing 69,850 acres. Twelve segments (34,520 acres) of eight river study areas are recommended as Wild. Seven segments are in wilderness areas. The remaining 12 segments are recommended for either Scenic or Recreational designations (34,827 acres). Three river study areas with outstandingly remarkable

RMP Planned Acquisitions

scenic values are recommended as not suitable for designation. These are Turkey Creek, Francis Creek, and the Hassayampa River.

The outstandingly remarkable scenic values include canyons, mountain slopes, rolling hills, and broad river channels. Many of the areas offer exceptional opportunities for sightseeing and photography. Riparian forests and heavy stands of vegetation offer sharp contrasts in areas where the surrounding vegetation is dominated by desert shrubs.

Mineral entry, leasing and material disposals would be prohibited by withdrawal on five Wild segments (8,230 acres) of three river study areas. The three river study areas are the Agua Fria River (3,230 acres), Burro Creek (3 segments, 4,260 acres), and the Santa Maria River (740 acres). These areas have a low to moderate potential for locatable minerals. Prohibiting mineral entry would protect the outstandingly remarkable scenic values by preventing surface disturbance from new mining activities in the river corridors. Approved plans of operations would be required for all mining related activity above casual use.

Patents would be restricted to the mineral estate on 20,409 acres outside of wilderness areas in seven river study areas. The segments are in the Agua Fria River, Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Santa Maria River, and Virgin river study areas.

Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances by returning the area to a natural condition.

New roads would be prohibited on 8,230 acres outside of wilderness areas in the Wild segments of three river study areas (Agua Fria River, Burro Creek, Santa Maria River).

Motorized travel also would be restricted in

these areas.

Prohibiting new roads and restricting travel would protect the outstandingly remarkable scenic values from any damage by vehicle use in the river study areas. In certain situations the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities.

New rights-of-way would be discouraged in the Wild segments (8,230 acres) outside of wilderness areas. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable scenic values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where these have not already been initiated, instream flow assessments on the 11 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable scenic values.

Under the recommended alternative dams, levees and other types of diversions would be prohibited on 211 miles of 11 rivers. This action would protect the outstandingly remarkable scenic values on 23 segments by maintaining natural landscapes and stream flows.

With Congressional designation and Bureau of Land Management implementation, the outstandingly remarkable scenic values would be legislatively protected from possible inundation by the Alamo Reservoir on two segments and up to 7,000 acres along approximately 24 riparian miles of the Big Sandy and Santa Maria rivers.

Additional protection for the outstandingly

remarkable scenic values would be supplied by the ongoing management activities described in Chapter 2.

In the Turkey Creek study area, determined to be nonsultable, approximately 370 of the 1100 acres are protected by the Aravaipa Creek Wilderness Area and any impacts of nondesignation would be minimal. The remainder (730 acres) would be under administrative protection from the Turkey Creek Riparian Area of Critical Environmental Concern. Impacts to the outstandingly remarkable scenic values resulting from nondesignation in this portion could arise from activities such as recreation and possibly minerals development. Recreation use can result in damage and introduce trash including glass and metal objects as well as other foreign elements in areas not designated for legislative protection. Also, although the mineral potential is low and any mining actions would be subject to approval of a mining plan of operations. exploration efforts could occur and these could impair the outstandingly remarkable scenic values.

In the Francis Creek study area, determined to be nonsuitable, about 480 acres of the 1360-acre total would be under the administrative protection of the Burro Creek Riparian and Cultural Area of Critical Environmental Concern. Recreation, Off-highway vehicle use, woodcutting, native plant removal, and other actions that could potentially damage the outstandingly remarkable scenic values are addressed in management restrictions in the area of critical environmental concern. Because of this any impacts resulting from nondesignation in this portion of the study area would be minimal.

Approximately 3,500 acres of the Hassayampa River determined to be nonsuitable are in the Hassayampa Canyon Wilderness. Although the legislative protection of wilderness does not specifically include outstandingly remarkable scenic values associated with the river study

area, wilderness protection would prevent any significant deterioration to the values through the prohibition of new mineral entry subject to valid existing rights, mechanized vehicle use, and other provisions of wilderness management.

The remaining acreage in Turkey Creek and the Hassayampa River study area would be subject to several types of impacts. A low potential for locatable minerals exists in the Francis Creek region, but the potential is medium to high in the Hassayampa River study area. For example, the impacts on the outstandingly remarkable scenic values from exploration activities and the development of new small mining operations could be substantial. Although reclamation is required of small mining ventures, there is a potential for adverse impacts on the outstandingly remarkable scenic values.

The impacts from mining activities above casual use would be minimized because they are subject to approved plans of operation and Bureau of Land Management stipulations that would prevent damage to outstandingly remarkable values.

On these acres in the nonsultable study areas that are not under other legislative or administrative protection, off-highway vehicle use and other recreation activities such as camping would not be subject to special management stipulations or guidance. As a result, the outstandingly remarkable scenic values, which although not currently threatened, could be at risk as demands on public lands increase.

Conclusion

Implementation of the recommended alternative would have no adverse impacts on outstandingly remarkable scenic values on 24 segments and 69,850 acres of 11 rivers. A beneficial impact would result from long-term legislative protection of these values under the Wild and Scenic Rivers Act.

Outstandingly remarkable values in the five segments of the three rivers determined to be nonsuitable cover 20,340 acres. Much of this acreage is included in wilderness areas (portions of Turkey Creek, Hassayampa River) and areas of critical environmental concern where the outstandingly remarkable values would receive administrative protection.

Two river study areas included in the 14 rivers under the recommended alternative, Bonita Creek and Cienega Creek, do not have outstandingly remarkable scenic values.

Impacts on outstandingly remarkable recreational values

Nine of the 20 eligible river study areas contain outstandingly remarkable recreational values.

Eight of the nine rivers are determined suitable and identified for Congressional designation by the recommended alternative. These eight river study areas consist of 20 segments covering 54,330 acres. One study area, Turkey Creek, is determined to be nonsuitable. The outstandingly remarkable recreational values in the 1100-acre Turkey Creek study area would not receive legislative protection from the provisions in the Wild and Scenic Rivers Act. A 2,450 acre portion of Burro Creek, and a small portion of the Lower San Francisco River study area also would be determined not suitable.

The outstandingly remarkable recreational values support hiking, backpacking, camping, horseback riding, sightseeing, wildlife observation, hunting, fishing, photography, rock climbing, swimming, rafting, kayaking, canoeing, and geologic, ecologic, off highway vehicle use and cultural resource observation and interpretation. Visitor use figures range from annual uses that are very low (Wright Creek) to the very popular Aravaipa Creek, Burro Creek, and San Pedro River areas.

Table 3-6 in Chapter 3 summarizes the primary types of recreation associated with each study

area. In addition, visitors are attracted by archaeological and historic resources. There are numerous opportunities for photographic and artistic projects.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 4,260 acres of the Wild segments of one river study area (Burro Creek). This prohibition would eliminate any surface disturbances or conflicts with the outstandingly remarkable recreational values from new mining operations. Approved plans of operation would be required for all mining related activity above casual use.

Patents would be restricted to the mineral estate on 11,349 acres in five river study areas (Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, and Virgin River). This action would preserve the surface in federal ownership and management. Although mining activities could alter the landscape and affect outstandingly remarkable recreational values, reclamation is required, and reclamation would mitigate surface disturbances.

New roads would be prohibited on 4,260 acres the in the Wild segments of one river study area (Burro Creek). Motorized use also would be restricted in this segment. Prohibiting new roads and restricting motorized travel would protect the outstandingly remarkable recreational values from any damage by, or conflicts with vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for other recreational, scientific, minerals development, or other activities.

In five river study areas with Wild segments (24,800 acres) new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade the outstandingly remarkable recreational values; however, the approval of new rights-of-way would require the completion

TABLE 4-RA2; MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE RECREATION VALUES

		RI	ECREA	TION	VAL	UES			
RIVER STUDY	ARA-	BILL	BURRO	GILA	L.SAN	PARIA	SAN	VIR-	BLM
AREAS	VAIPA	WLMS	CREEK	BOX	FRAN-		PEDRO	GIN	PUBLIC
					CISCO				LAND
BLM Public Land Acres	3200	4650	7010	7460	1450	8960	12256	9344	54330
Wild Segments	3200	4164	7010	0	0	8960	0	928	24262
No Roads in Wild Segs	0	0	4260	0	0	0	0	0	4260
No New Mineral Entry	0	0	4260	0	0	0	0	0	4260
No Surface Patent	0	486	3787	1410	1410	0	0	4256	11349
Motorized Use Restricted	0	0	4260	o	0	0	0	0	4260
No Dams or Diversions	3200	4650	7010	7460	1450	8960	12256	9344	54330
Acres covered in outstanding	yy remark	able porti	on by man	agement	actions	common	to all altern	utives	
WLDR/RNCA	3200	4164	3223	6050	40	8960	12256	5088	42981
ACEC	0	486	4260	0	0	0	1120	4256	10122
Miles Closed	0	0	0	25	0	0	0	0	25
Existing Roads	0	0	1777	0	1450	0	0	0	3227
Designated Roads	0	486	673	7460	40	0	12256	4256	25171
No Surface Occupancy	0	486	673	0	1450	0	0	4256	6865
Protection of Nests	0	486	4933	0	0	0	0	0	5419
Erosion Control	0	0	0	0	0	0	38	0	38
Cottonwood Planting	0	100	0	0	0	0	1120	0	1220
No Woodcutting	0	0	0	550	0	0	0	9344	9894
Dead/Down Wood Only	0	0	0	0	0	0	0	4256	4256
No Native Plant Removal	0	486	673	0	0	0	0	0	1159
Salt Cedar Removal	3200	510	0	0	0	0	710	0	4420
Fencing	0	5	0	0	5	0	0	0	10
Unique Waters Monitoring	10	0	24	0	5	0	10	0	49
New Water Sources	0	5	5	5	0	0	0	o	15
Camp Outside Riparian	0	486	4933	0	0	0	0	0	5419
Helicopter Restrictions	0	486	4933	ō	0	0	0	0	5419
Total acres (BLM/private/ot)									<u> </u>
Total Acres	2200	caen	7400	7040	2020	9044	1,4000	11040	£1100
	3200	6357	7490	7960	2020	8960	14080	11040	61107
Private	0	524	480	500	570	0	1824	1632	5530
State/Other	0	684	0	0	0	0	0	64	748
RMP Planned Acquisitions	0	800	480	500	570	0	480	1596	4426

of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the eight study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study aree to protect the outstandingly remarkable recreational values.

Prohibiting dams, levees, and other types of diversions on the approximate 150 riparian miles covered by this portion of the recommended alternative would protect outstandingly remarkable recreational values on the 20 segments. In addition, the outstandingly remarkable recreational values along the riparian miles of eight rivers would be protected by maintaining natural landscapes and stream flows. The outstandingly remarkable recreational values would also be protected by the ongoing management actions described in Chapter 2.

Although the eligibility evaluation determined that the 1100-acre Turkey Creek study area possessed outstandingly remarkable recreational values, this area is determined to be nonsuitable in the recommended alternative. While the outstandingly remarkable recreational values would not receive long-term legislative protection under the Wild and Scenic Rivers Act, there would be some protection on the 370 acres in the Aravaipa Wilderness Area. The remaining 730 acres would not have special legislative protection.

Conclusion

There would be no adverse impacts on the outstandingly remarkable recreational values on 54,330 acres from implementation of the recommended alternative. The long-term legislative protection would be beneficial. The outstandingly remarkable recreational values on about 3,950 acres not determined suitable would be protected under wilderness and the administrative actions of area of critical environmental concern management. Adverse impacts would not be expected to occur.

Impacts on outstandingly remarkable geologic values

Outstandingly remarkable geologic values are found in three of the 20 river study areas. Over 15,000 acres in two of these river study areas (Paria and Gila River: Gila Box) are in wilderness areas or riparian national conservation areas and have long-term legislative protection.

Approximately 424 acres in the Lower San Francisco River study area would be determined to be nonsultable.

Patents would be restricted to the mineral estate on 2,820 acres in the Glla River: Gila Box and Lower San Francisco river study areas.

Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and this would mitigate surface disturbances.

Under the recommended alternative dams, levees, and other types of diversions would be prohibited on approximately 59 riparian miles. This action would protect outstandingly remarkable geologic values by maintaining natural landscapes and stream flows.

TABLE 4-RA3: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE GEOLOGIC VALUES

RIVER STUDY	GILA	BLE (BLM
AREA	BOX	FRAN-	RIVER	PUBLIC
		CISCO		LAND
BLM Public Land Acres	7460	1450	8960	17870
Wild Segments	0	0	8960	8960
No Roads in Wild Segs	0	0	0	0
No New Mineral Entry	0	0	0	0
No Surface Patent	1410	1410	0	2820
Motorized Use Restricted	0	0	0	0
No Dams or Diversions	7460	1450	8960	17870
Acres covered in outstanding	-	-		
management actions commo				
WLDR/RNCA	6050	40		15050
ACEC	0	0	0	0
Miles Closed	25	0	0	25
Existing Roads	0	1450	_	1450
Designated Roads	7460	40	0	7500
No Surface Occupancy	0	1450	_	1450
Protection of Nests	0	0	0	0
Erosion Control	0	0	0	0
Cottonwood Planting	0	0	0	0
No Woodcutting	550	0	0	550
Dead/Down Wood Only	0	0		0
No Native Piant Removal	0	0	0	0
Salt Cedar Removal	0	0	0	Ó
Fencing	0	5	0	5
Unique Waters Monitoring	0	5	0	5
New Water Sources	5	0	0	5
Camp Outside Riparian	0	0	0	0
Helicopter Restrictions	0	0	0	0
Total acres (BLM/Private/O	ther) cov	ered by o	outstandin	gly
remarkable portion				
Total Acres	7960	2020	8960	18940
Private	500	570	0	1070
State/Other	0	0	0	0
RMP Planned Acquisitions	500	570	0	1070

Conclusion

There would be no adverse impacts on the outstandingly remarkable geologic values on 17,870 acres from the implementation of the recommended alternative. The 424 acres in the Lower San Francisco River study area would not be under the long-term protection of the Wild and Scenic Rivers Act.

Impacts on outstandingly remarkable fish and wildlife habitat and aquatic habitat values

Outstandingly remarkable fish and wildlife habitat values were identified in 19 of the 20 eligible river study areas. Aquatic habitat was identified as an outstandingly remarkable value in two river study areas: Bonita Creek and the Virgin River.

All 14 of the river study areas determined to be suitable for designation by Congress into the Wild and Scenic Rivers System by the recommended alternative contain this value. These 14 rivers consist of 29 segments covering 75,340 acres. Twelve segments (35,000 acres) are recommended for designation with a Wild classification. The remaining 17 segments (39,340 acres) are identified for either a Scenic or Recreational classification.

The recommended alternative also determines that 27,101 acres in four river study areas (11 segments) and segments of other suitable rivers with outstandingly remarkable fish and wildlife habitat and aquatic habitat values are nonsuitable. These include the Francis Creek, Hassayampa River, Hot Springs Canyon, Swamp Springs, and Wright Creek study areas and portions of Big Sandy River (2030 acres), Burro Creek (2,450 acres), Middle Gila River (4,350 acres), and Santa Maria River (2,240 acres).

Tables 3-7 and 3-8 in Chapter 3 provide details on fish and wildlife populations and riparian vegetation by river area for each of the 20 river study areas.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 8,230 acres in the Wild segments of three river study areas (Agua Fria River, Burro Creek, Santa Maria River) outside of wilderness areas and riparlan national conservation areas. This prohibition would eliminate any threat to the outstandingly remarkable fish and wildlife values from spills, excavations, transportation, and other activities associated with mining operations.

Patents would be restricted to the mineral estate on 23,659 acres in nine river study areas outside wilderness areas and riparian national conservation areas. The river study areas include the Agua Fria River, Bill Williams River, Bonita Creek, Burro Creek, Clenega Creek, Gila River: Gila Box, Lower San Francisco River, Middle Gila River, Santa Maria River, and Virgin River. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape and potentially affect habitat, reclamation is required.

New roads would be prohibited on 8,230 acres outside of wilderness areas in segments recommended as Wild in three river study areas (Agua Fria River, Burro Creek, Santa Maria River). Motorized use also would be restricted in these areas. Prohibiting new roads and restricting motorized use would protect the outstandingly remarkable fish and wildlife values from vehicle use and potential damage in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities.

New rights-of-way would be discouraged in three Wild river study areas (8,230 acres) outside of wilderness areas. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes.

TABLE 4-RA4: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE FISH AND WILDLIFE

		,					HABITA								
RIVER STUDY		ARA-		BILL			CIENEGA				PARIA	SAN	SANTA		BLM
AREAS	FRIA	VAIPA	SANDY	WLMS	CREE	CREEK	CREEK	BOX	FRAN-	CHLA		PEDRO	MARIA	GIN	PUBLIC
									cisco						LAND
BLM Public Land Acres	6710	3200	2190	4650	1810	7010	3200	7460	1450	1780	8960	12256	4840	9344	7486
Wild Segments	3230	3200	2190	4164	0	7010	0	0	0	0	8960	0	4840	928	3452
No Roods in Wild Segs	3230	0	0	0	0	4260	0	0	0	0	0	0	740	0	823
No New Mineral Entry	3 23 0	0	0	0	0	4260	•	0	0	0	0	0	740	0	823
No Surface Paters	6710	0	0	486	50	3787	3200	1410	1410	1780	0	0	570	4256	2365
Motorized Use Restricted	3230	0	0	0	0	4260	•	0	0	0	0	0	740	0	823
No Dams or Diversions	6710	3200	2190	4650	1810	7010	3260	7460	1450	1780	B960	12256	4840	9344	7486
Acres covered in outstandin															. ,,,,,,
				-											
WLDR/RNCA	0	3200	2190	4164	1760	3223	0	6050	40	0	8960	12256	4270	5088	5120
ACEC	2160	0	1009	486	0	4260	0	0	0	0	0	1120	740	4256	1403
Miles Closed	1	0	0	0	11	0	5	25	0	0	0	0	0	0	4
Existing Roads	3000	0	628	0	0	1777	3280	0	1450	1780	0	0	1010	0	1284
Designated Roads	480	0	1009	486	1810	673	0	7460	40	0	0	12256	320	4256	2879
No Surface Occupancy	3480	0	1009	486	0	673	3200	0	1450	1780	0	0	1060	4256	1739
Protection of Nests	0	0	1009	486	0	4933	•	0	0	0	0	0	1060	0	748
Erosion Control	0	0	0	0	0	0	1	0	0	0	0	38	0	0	3
Cottonwood Plenting	670	0	0	100	0	0	0	0	0	0	0	1120	0	0	189
No Woodcarting	0	0	0	0	150	0	3200	550	0	3890	0	0	0	9344	1713
Dead/Down Wood Only	0	0	0	0	0	0	3200	0	0	0	0	0	320	4256	777
No Native Plant Removal	0	0	1009	486	0	673	0	0	0	0	0	0	320	0	248
Salt Cedar Removal	0	3200	420	510	0	0	0	0	0	610	0	710	0	0	545
Fencing	0	0	0	5	5	0	0	0	5	0	0	0	0	0	1
Unique Waters Monitoring	0	10	0	0	5	24	0	0	5	0	0	10	0	0	5
New Water Sources	0	0	5	5	1	5	0	5	0	0	0	0	5	0	2
Camp Outside Riperian	0	0	1009	486	3570	4933	0	0	0	0	0	0	740	0	1073
Helicopter Restrictions	0	 0	1009	600	0	4933	0	0	0	0	0	0	1060	0	760
Total ecres (BLM/Private/C	Uher) oov	ered by o	utstanding	ty remark	apie ba	lkin									
Total Acres	7160	3200	2920	6357	2430	7490	3360	7960	2020	2330	8960	14080	5450	11040	8475
Private	450	0	730	524	620	480	0	500	570	320	0	1824	610	1632	826
State/Other	Đ	0	0	684	0	0	£60	0	0	230	0	0	0	64	113
RMP Planned Acquisitions	120	0	730	800	490	480	160	500	570	550	0	480	610	1596	708

Rights-of-way could degrade outstandingly remarkable fish and wildlife habitat values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the 14 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable fish and wildlife habitat values.

Under the recommended alternative dams, levees, and other types of diversions would be prohibited on 241 riparian miles of 14 rivers. This action would protect the outstandingly remarkable fish and wildlife habitat values on the 29 segments by maintaining natural landscapes and stream flows.

The outstandingly remarkable fish and wildlife habitat and aquatic habitat values also would receive protection from the ongoing management actions described in Chapter 2.

Six study areas with outstandingly remarkable fish and wildlife habitat and aquatic habitat values are determined to be nonsultable. Some of these areas are in wilderness areas (Swamp Springs, a portion of the Hassayampa River). The remainder have varying types of special protection. Administrative protection under area of critical environmental concern management provides protection for Hot Springs Canyon, Wright Creek, and a 480-acre portion of Francis Creek. The acreage in these areas would be subject to mining activities and operations which can impair fish and wildlife habitat.

In 880 acres of the Francis Creek study area the outstandingly remarkable fish and wildlife habitat and aquatic habitat values, which are not

currently threatened, could be at risk as demands on public lands increase and off highway vehicle use, camping, and other recreational activities expand.

Conclusion

Implementation of the recommended alternative would have no adverse impacts on the outstandingly remarkable fish and wildlife habitat and aquatic habitat values on 75,340 acres. Placing the areas under the long-term legislative protection of the Wild and Scenic Rivers Act would be a beneficial Impact.

The outstandingly remarkable fish and wildlife habitat and aquatic habitat values in the 27,101 acres in six river study areas (13 segments) and segments determined to be nonsultable would not be under the long-term legislative protection of the Wild and Scenic Rivers Act. These include the Francis Creek, Hassayampa River, Hot Springs Canyon, Swamp Springs, and Wright Creek study areas and portions of Big Sandy River (2,030 acres), Burro Creek (2,450 acres), Middle Gila River (4,350 acres), and Santa Maria River (2,240 acres). In areas not protected by wilderness or under the administrative protection of area of critical environmental concern management, degradation of the values could occur because of increasing demands on public land resources in the future.

Impacts on outstandingly remarkable cultural, historic, and paleontologic resource values

Eighteen of the 20 eligible river study areas are known to contain prehistoric and historic archaeological sites. Nine of these are regarded as having outstandingly remarkable cultural resource values. Details of these nine areas are shown in Table 3-9, Chapter 3. Prehistoric sites are present in all 18 areas; six contain historic sites.

TABLE 4-RA5: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE CULTURAL. HISTORIC, AND PALAEONTOLOGIC VALUES

CULTURAL, I	AGUA	BONI-	BURRO	GILA	L.SAN	PARIA	SAN	BLM
AREAS	FRIA	CREEK		BOX	FRAN-		PEDRO	PUBLIC
-					CISCO			LAND
BLM Public Land Acres	6710	1810	7010	7460	1450	8960	12256	45656
Wild Segments	3230	0	7010	0	0	8960	0	19200
No Roads in Wild Sega	3230	0	4260	0	0	0	0	7490
No New Mineral Entry	3230	0	4260	0	o	0	0	7490
No Surface Patem	6710	50	3787	1410	1410	0	0	13367
Motorized Use Restricted	3230	0	4260	0	0	0	0	7490
No Dams or Diversions	6710	1810	7010	7460	1450	8960	12256	45656
Acres covered in outstanding	ly remar	kable po	rtion by n	nanagem	ent actio	ns comm	on to all al	ternatives
WLDR/RNCA	0	1760	3223	6050	40	8960	12256	32289
ACEC	2160	0	4260	0	0	0	1120	7540
Miles Closed	1	11	0	25	0	0	0	37
Existing Roads	3000	0	1777	0	1450	0	0	6227
Designated Roads	480	1810	673	7460	40	0	12256	22719
No Surface Occupancy	3480	0	673	0	1450	0	0	5603
Protection of Nests	0	0	4933	0	0	0	0	4933
Erosion Control	0	0	0	0	0	o	38	38
Cottonwood Planting	670	0	0	0	0	0	1120	1790
No Woodcutting	0	150	0	550	0	0	0	700
Dead/Down Wood Only	0	0	0	0	0	0	0	0
No Native Plant Removal	0	0	673	0	0	0	0	673
Salt Cedar Removal	0	0	0	0	0	0	710	710
Fencing	0	5	0	0	5	0	. 0	10
Unique Waters Monitoring	0	5	24	0	5	0	10	44
New Water Sources	0	1	5	5	0	0	· c) 11
Camp Outside Riparian	0	3570	4933	0	0) 0	· c	8503
Helicopter Restrictions	0	0	4933	0	0) 0		4933
Total acres (BLM/Private/Ot	her) cov	ered by	ulstandii	igly rem	arkable j	portion		
Total Acres	7160	2430	7490	7960	2020	8960	14080	50100
	450							4444
Private								
Private State/Other	0		0	0	O) () 0

The recommended alternative determines suitability and recommends designation for seven river study areas consisting of 16 segments (45,656 acres) with outstandingly remarkable cultural and historic values for designation. Six segments (19,200 acres) are recommended for designation with a Wild classification and the remaining 10 segments (26,460 acres) for a Scenic or Recreational classification. Approximately 9,600 acres with outstandingly remarkable cultural and historic values are determined to be nonsultable.

These primarily are in two study areas (the 1100-acre Turkey Creek and 3,861-acre Wright Creek) and portions of Bonita Creek (1,760 acres), and Burro Creek (2,450 acres).

Outstandingly remarkable cultural resource values in nine of the study areas are rare and significant but nonetheless threatened from damage by erosion and human activities such as vandalism and off-road vehicle traffic.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 7,490 acres on the Agua Fria River and Burro Creek segments designated as Wild. Motorized travel is restricted and new roads are also prohibited in these areas. These actions would prevent any potential damage to the outstandingly remarkable cultural, historic, and paleontologic values from damage or destruction by minerals excavation and tailings deposits or from road construction and vehicle travel.

Patents would be restricted to the mineral estate on 13,367 acres in five river study areas outside of wilderness areas and riparlan national conservation areas. Included are the Agua Fria River, Burro Creek, Bonita Creek, Gila River: Gila Box, and Lower San Francisco River.

Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Mining activities would be monitored to prevent damage to cultural resources. Alteration of the landscape could affect the setting and surroundings integral to the cultural, historic, and paleontologic values. However, reclamation is required, and reclamation would mitigate surface disturbances.

In the river segments (19,200 acres) outside of wilderness areas, new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable cultural, historic, and paleontological values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

The outstandingly remarkable cultural, historic, and paleontologic values also would be protected by the ongoing management actions described in Chapter 2. For example, proposed activities that could result in increased use or surface disturbance would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed. Sites evaluated as eligible for the National Register of Historic Places, in consultation with the State Historic Preservation Officer, would normally be avoided by the proposed activity. However, if avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.

Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.

Two of the nine study areas with outstandingly remarkable cultural, historic and paleontologic values identified in the eligibility determinations are determined to be nonsultable. These are the Turkey and Wright Creek study areas (4,960 acres).

A 370-acre portion of Turkey Creek is under the legislative protection of Wilderness. Administrative protection for the rest of Turkey Creek and all of Wright Creek is ensured by Area of Critical Environmental Concern management. For example, traval in the Wright Creek study area is restricted to existing roads; in Turkey Creek travel is restricted to existing roads. No surface occupancy restrictions exist in both study areas.

Recreational use would not be restricted to protect the outstandingly remarkable values. As a result, the outstandingly remarkable cultural, historic, and paleontologic values, which are not currently threatened, could be at risk as demands on public lands increase.

Conclusion

Implementation of the recommended alternative would have no adverse impacts on the outstandingly remarkable cultural and historic values (45,656 acres). Placing the areas under the long-term legislative protection of the Wild and Scenic Rivers Act would be a beneficial impact.

The outstandingly remarkable cultural and historic values in the approximately 9,600 acres

would not be under the long-term legislative protection of the Wild and Scenic Rivers Act. These primarily are in two study areas (the 1100-acre Turkey Creek and 3,861-acre Wright Creek) and portions of Bonita Creek (1,760 acres), Burro Creek (2,450 acres). Degradation of the values could occur because of increasing demands on public land resources in the future.

Impacts on outstandingly remarkable hydrologic values

Two river study areas (8,910 acres) have outstandingly remarkable hydrologic values. Portions of both study areas (7,000 acres) are within the Gila River: Gila Box Riparlan National Conservation Area established by Congress in 1990. The recommended alternative would determine approximately 430 acres in the Lower San Francisco River study area to be nonsultable.

The outstandingly remarkable hydrologic values are identified with perennial natural water flow in an otherwise semi-arid desert environment.

Currently water rights in the area are under a complex state and federal water rights litigation process that eventually will determine stream flow quantities. The most likely scenario is that senior water rights will be located downstream, assuring continued flow in the Gila River: Gila Box.

Where not already initiated, instream flow assessments on the two study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable hydrologic values.

TABLE 4-RA6: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE HYDROLOGIC VALUES

	LOGIC		
RIVER STUDY AREAS	GILA	L.SAN	BLM
AREAD	вох	FRAN-	PUBLIC
		CISCO	LAND
BLM Public Land Acres	7460	1450	8910
DEIVE OVIIV EMBO I WIN	, ,,,,	* .5 \$	4314
Wild Segments	0	0	0
Ma Oaburana	_	ŭ	•
No Roads in Wild Segs	0	0	0
• • • • • • • • • • • • • • • • • • •			
No New Mineral Entry	0	0	0
,			
No Surface Patent	1410	1410	2820
Motorized Use Restricted	0	0	0
Fed Reserve Water Right	7460	1450	8910
Acres covered in outstanding	dy r u mar	kable po	rtion by
management actions commo	n to all al	ternative	≄s
WLDR/RNCA	6050	40	6090
ACEC	0	0	0
Miles Closed	25	0	25
Existing Roads	0	1450	1450
Designated Roads	7460	40	7500
No Surface Occupancy	0	1450	1450
Protection of Nests	0	0	0
Erosion Control	0	0	0
Cottonwood Planting	0	0	0
No Woodcutting	550	0	550
Dead/Down Wood Only	0	0	0
No Native Plant Removal	0	0	0
Salt Cedar Removal	0	0	0
Fencing	0	5	5
Unique Waters Monitoring	0	5	5
New Water Sources	5	0	5
Camp Outside Riparian	0	0	0
Helicopter Restrictions	0	0	0
Total acres (BLM/Private/O	ther) cov	ered by	
outstandingly remarkable po		-	
Total Acres	7960	2020	9980
Private	500	570	1070
State/Other	0	0	0
RMP Planned Acquisitions	500	570	1070

Prohibiting dams, levees, and other types of diversions on the approximate 32 riparian miles covered by the this portion of the recommended alternative would protect outstandingly remarkable hydrologic values.

Conclusion

Implementation of the recommended alternative would have no adverse impacts on outstandingly remarkable hydrologic values (8,910 acres). The legislative protection for the outstandingly remarkable hydrologic values from the Wild and Scenic Rivers Act would complement the legislative protection associated with the riparian national conservation area status.

The outstandingly remarkable hydrologic values on 434 acres in the Lower San Francisco River study area determined to be nonsultable would not have long-term legislative protection under the Wild and Scenic Rivers Act.

· Impacts on Minerals Development

A locatable mineral potential exists in 34 of the 40 eligible river study area segments (98,120 acres). There is no mineral potential in six river study area segments (7,597 acres). These are the Bill Williams River (2 segments, 2,336 acres), Clenega Creek (2 segments, 3,200 acres), Hot Springs Canyon (1 segment, 1,600 acres), and Swamp Springs (1 segment, 640 acres).

TABLE 4-RAMN1 SEGMENTS WITH MINERAL POTENTIAL

Wild and Scenic River Study Area	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5
Agua Fria River	L;1390ac Scenic	M;3230ac Wild	L;2090ac Scenic		
Aravaipa Creek	L;3200ac Wild				
Big Sandy River		L-M;2190ac Wild			
Bill Williams River	L-M;2314ac Wild	N:486ac Scenic	N;1850ac Wild		
Bonita Creek	L; 1810ac Recreational				
Burro Creek	L;500ac Wild	L-M;2750ac Wild		M-H; 2630ac Wild	M;1130ac Wild
Cienega Creek	N; 3, 200ac Scenic				
Gila Box; Gila River	L;1940ac Recreational	L;4250ac Scenic	N-L;1270ac Recreational		
Gila Box; Lower San Francisco River	L;710ac Recreational	L;740ac Racreational			
Middle Gila River			M;1780ac Recreational		
Paria River	L-H;8960ac Wild				
San Pedro River	L/M;11616ac Recreational		L/M;640ac Recreational		
Santa Maria River	L/M;4840ac Wild				
Virgin River	L;928ec Wild	L;2336ac Scenic	L;2368ac Recreational	L;3712ac Recreational	

The recommended alternative includes 14 river study areas containing 29 segments (74,860 acres). Twelve of these segments (34,522 acres) are determined sultable and recommended for designation with a Wild classification; the remaining 17 segments (39,338 acres) are recommended for designation with a Scenic or Recreational classification.

In the implementation of the recommended alternative, five segments (8,230 acres) with

mineral potential and outside of wilderness areas would be recommended for a Wild classification and withdrawn from mineral entry. The river study areas and segments are shown in Table 4-RAMN2. Acreage is shown for segments that would be withdrawn under the Wild and Scenic Rivers Act; acres are not included for segments withdrawn in wilderness areas.

TABLE 4-RAMN2 RIVER AREA WILD SEGMENT MINERAL WITHDRAWALS

River Study Area	Segment 1	Segment 2	Segment 4	Segment 5
Agua Fria		Moderate 3230 acres		
Araveipa	Low WLDR Withdraw			
Big Sandy		Low/Moderate WLDR Withdraw		
Burro Creek	Low 500 acres	Low/Moderate WLDR Withdraw	Moderate/High 2630 acres	Moderate 1130 acres
Pada	Low/High WLDR Withdraw			
Santa Maria	Low/Moderate 740 acres			
Virgin	Low WLDR Withdraw			

As Table 4-RAMN2 Indicates, segments in the Agua Fria River, Bill Williams River, Burro Creek, and Santa Maria River study areas would be recommended for designation with a Wild classification and withdrawn from mineral entry under the Wild and Scenic Rivers Act.

The 17 segments (37,138 acres) in river study areas recommended for designation and a Scenic or Recreational classification would not be withdrawn from mineral entry under the Wild and Scenic Rivers Act. These are shown in Table 4-RAMN3.

TABLE 4-RAMN3 RIVER AREA SCENIC AND RECREATIONAL LOCATABLE MINERAL POTENTIAL

River Study Area	Segment 1	Segment 2	Segment 3	Segment 4
Agua Fria	L;1390ac Scanic; ACEC		L;2090ac Scenic	
Bill Williams		N;486ac Scenic; ACEC		
Bonita Creek	N-L;1810ac Recreational; RNCA			
Gila Box	L;1940ac Recreational; RNCA	L;4250ac Scenic; RNCA	N-L; 1 270±c Recreational; RNCA	
Lower San Francisco	L;710ac Recreational; RNCA	L;740ac Recreational;		
Middle Gila			M;1780ac Recreation	
San Padro	L/M;11616ac Recreation; RNCA		L/M;640sc Recreation; RNCA	
Virgin		L;2336ac Scanic WLDR	L;2368ac Recreation WLDR	L;3712ac Recreation ACEC

However, as Table 4-RAMN3 illustrates, nine of the 15 segments (26,460 acres) are under wilderness area or riparian national conservation area withdrawals. The remaining six segments (10,198 acres) include segments 1 and 3 in the Agua Fria River, segment 2 in the Bill Williams River, segment 2 in the Lower San Francisco River, segment 3 in the Middle Gila River, and segment 5 in the Virgin River study areas. Three of these segments are in areas of critical environmental concern where mineral withdrawals will be recommended.

Adverse impacts on minerals development may be caused by other changes. For example, minerals development activities on moderate-to-high potential areas adjacent to withdrawal areas may not occur, or may be curtailed if the ore deposit is too small for a reasonable operation. Prohibiting roads in Wild segments may hinder access to areas outside the wild

and scenic river corridor for exploration and/or minerals development.

Conclusion

There are 27 segments where the locatable mineral potential has been estimated. Five of these segments (8,230 acres) would be recommended for a Wild classification and mineral withdrawal under the Wild and Scenic Rivers Act. One segment (2,630 acres) has a moderate to high mineral potential. Two others (4,360 acres) have a moderate potential. The remaining two segments (1,240 acres) have low to moderate potential.

Although there would be no additional acres withdrawn under the Wild and Scenic Act provisions of the recommended alternative, minerals entry also would be prohibited in 11 segments (46,600 acres) recommended for Wild

designations in wilderness areas and riparian national conservation areas.

Prohibiting mineral entry on up to 8,230 acres in five segments of three river study areas would have a minor adverse impact on minerals development.

Impacts on Tourism

The recommended alternative determines suitability and recommends designation for rivers in nine counties: Cochise, Coconino, Gila,

Graham, Greenlee, La Paz, Mohave, Pinal, and Yavapai. The travel and tourism data for these counties (Chapter 3, Table 3-14), shows a wide range of visitor totals. For Graham County, the eight-year average was 46,100. In contrast, Coconino County totals were approximately 7.5 million. Greenlee County was omitted because it has no national or state parks or recreational areas.

Visitor expectations for the rivers determined suitable and recommended for designation in these counties are shown in Table 4-RAT1.

TABLE 4-RAT1
VISITOR USE CHANGES

			
COUNTY	RIVER STUDY AREA	CURRENT USE	ESTIMATED VISITOR INCREASE
Cochise	San Pedro	>50,000	>10 percent
Сосопіпо	Paria	5,300	
Gila	Middle Gila	1,600	< 20 percent
Graham	Araveipa Creek Bonita Creek Gila Box: Gila River	>15,000 15,000 4,000	< 20 percent < 20 percent
Graenies	Gita Box: Gita River Gita Box: Lower San Francisco River	4,000 >1,000	<20 percent
La Paz	Bill Williams River Santa Maria River	<2,500 <2,000	<10 percent <10 percent
Mohave	Big Sandy River Bill Williams River Burro Creek Santa Marla River Virgin River	2,500 < 2,500 > 20,000 < 2,000 7,600	<10 percent <10 percent >10 percent <10 percent >10 percent
Pima	Cienega Creek	> 2,500	<20 percent
Pinal	Aravaipa Creek Middle Gila	>15,000 1,500	<20 percent
Yavapai	Burro Creek Santa Maria River	> 20,000 > 2,000	>10 percent <10 percent

The estimations in Table 4-RAT1 regarding increases in visitor use involve several assumptions. One of these is the normal trend of visitor use growth. Regardless of designation, the number of visitors to the river study areas is expected to increase in proportion to anticipated increases in tourism throughout the state. For example, the San Pedro River Riparian National Conservation Area currently records over 50,000 annual visitor use days. Visitor use will increase in the future regardless of Congressional action on designation. The publicity associated with Wild and Scenic river designation would add slightly to the normal increase.

Another assumption is that wild and scenic river designation will be accompanied by publicity. Maps will identify the rivers; brochures may be developed; commercial tour ventures may develop. The Bureau of Land Management sponsored a University of Arizona study on nature-based tourism in southeastern Arizona. The study illustrates how nature-based tourism can benefit local economies (University of Arizona, 1992). The wild and scenic river publicity would have its greatest effect on river study areas in and near the tourism centers of the Phoenix (Maricopa County) and Tucson (Pima County) metropolitan areas. Other centers would be the cities of Sedona. (Yavapai/Coconino County), Sierra Vista (Cochise County), Prescott (Yavapai County), Payson (Gila County), and in Mohave County, Lake Havasu City and Bullhead City.

A third assumption is that the Bureau of Land Menagement will not undertake recreational facility developments because of wild and scenic river designation. Rivers designated as Wild prohibit this. While recreational developments are allowed in Scenic and Recreational rivers, the Bureau of Land Management has no plans for the developing special facilities.

Finally, most of the river segments recommended as suitable for designation are in

primitive use areas with limited access.

Exceptions to this are the San Pedro River and portions of the Virgin, Gila, and San Francisco river study areas.

As Table 4-RAT1 Indicates, the estimated increase in visitors ranges from 5,000 in the San Pedro River study area to fewer than 500 in the more remote study areas. On a county basis, Graham County would have an additional 4,000 annual visitors, or nearly 10 percent of the average total park and recreational visits shown in Table 3-14. This would be a minor beneficial impact. In Greenlee County, which does not appear in the data displayed in Table 3-14, the estimated increase would be approximately 1,000 visitor use days. This also would be a minor beneficial impact.

In the other county areas where visitor totals are already high, visitor increase proportions resulting from wild and scenic river designation would be negligible.

Conclusion

Implementation of the recommended alternative would have no adverse effects on travel and tourism. Minor beneficial impacts would occur in Graham and Greenlee countles.

Cumulative effects of implementing the recommended alternative

A cumulative impact is defined as the impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Assessing the cumulative impacts of designation involves several assumptions:

- Wild and scenic river management actions are restricted in this document to public lands in Arizona managed by the Bureau of Land Management.
- Portions of the river study area under nonfederal ownership or management would be excluded. This includes portions owned or managed by tribal groups, private entities and states.
- Congressional action to include the rivers in the National Wild and Scenic Rivers System would not affect the use of private property.
- Designation does not open lands nonfederal lands to public access. The right to buy and sell property will not be affected.
- Ongoing management actions currently being implemented for wilderness areas, national conservation areas, and areas of critical environmental concern would occur on Bureau of Land Management lands in which the study areas are located.

Cumulative Impacts on outstandingly remarkable values

in the past, legislative protection for resource values has been provided through the designation of wilderness areas covering 4,537,864 acres of federal land in Arizona. Four agencies manage these wilderness areas: the Bureau of Land Management (1,405,750 acres), the U.S. Forest Service (1,344,970 acres), the U.S. Fish and Wildlife Service (1,343,444 acres), and the National Park Service (443,700 acres).

In 1984 Congress also designated portions of the Verde River in Arizona that are managed by the U.S. Forest Service as a wild and scenic river.

Currently, the Bureau of Land Management

recommended alternative has determined that 71,679 acres of federal land in Arizona are sultable and recommends these areas to Congress for designation into the National Wild and Scenic Rivers System.

The U.S. Forest Service has issued a Resource Information Report providing information on potential wild, scenic, and recreational rivers in six National Forests in Arizona (September, 1993). The Resource Information Report identifies 53 river areas totalling approximately 843 miles as potentially eligible for designation.

There is a possibility that, in the foreseeable future, some of the rivers identified by the U.S. Forest Service as potentially eligible will be included in a legislative bill introduced by Congress. If no bill is introduced, the U.S. Forest Service will complete the wild and scenic river evaluation through its planning process.

The U.S. Fish and Wildlife Service also has Identified an 11-mile segment of the Bill Williams River as potentially eligible for inclusion into the National Wild and Scenic River System. This segment also could be included in a Congressional legislative bill. If it is not, the U.S. Fish and Wildlife Service will incorporate the wild and scenic river evaluation into its planning process.

In addition, the National Park Service will study the Grand Canyon portion of the Colorado River to determine suitability (Grand Canyon National Park - Arizona; General Management Plan, September, 1993).

The protection of the public lands through legislative designation is considered to be a positive action. As evidence of this, Congress enacted the Wild and Scenic Rivers Act in 1969 in order to preserve and protect selected rivers for their outstandingly remarkable values and "for the benefit and enjoyment of future generations" (P.L. 90-542, Sec 1(b)).

Conclusion

implementing the recommended alternative determining sultability and recommending designation for the 14 river areas covering 74,860 acres would result in a beneficial cumulative impact for the outstandingly remarkable values.

Cumulative Impacts on minerals development

In the past, new mineral entry and leasing has been legislatively prohibited through the designation of wilderness areas covering 4,537,864 acres of federal land in Arizona. Four agencies manage these wilderness areas: the Bureau of Land Management (1,405,750 acres), the U.S. Forest Service (1,344,970 acres), the U.S. Fish and Wildlife Service (1,343,444 acres), and the National Park Service (443,700 acres).

Currently, the Bureau of Land Management recommended alternative has determined that 74.860 acres of federal land in Arizona are suitable and recommends these areas to Congress for designation into the National Wild and Scenic Rivers System. The recommended alternative recommends that five segments be classified as Wild. These five segments cover 8.230 acres. One segment is in an area estimated to have a moderate to high potential for locatable minerals. Two (4,360 acres) are in areas estimated to have a moderate locatable minerals potential. The remaining two segments (1,240 acres), are in areas with a low to moderate locatable minerals potential. Under the Wild and Scenic Rivers Act designation would withdraw these acres from new mineral entry and leasing.

The U.S. Forest Service has issued a Resource Information Report providing information on potential wild, scenic, and recreational rivers in six National Forests in Arizona (September, 1993). The Resource Information Report identifies 53 river areas totalling approximately 843 miles as potentially eligible for designation.

There is a possibility that, in the foreseeable future, some of the rivers identified by the U.S. Forest Service as potentially eligible will be included in a legislative bill introduced by Congress. If no bill is introduced, the U.S. Forest Service will complete the wild and scenic river evaluation through its planning process.

The U.S. Fish and Wildlife Service also has identified an 11-mile segment of the Bill Williams River as potentially eligible for inclusion into the National Wild and Scenic River System. This segment also could be included in a Congressional legislative bill. If it is not, the U.S. Fish and Wildlife Service will incorporate the wild and scenic river evaluation into its planning process.

In addition, the National Park Service will study the Grand Canyon portion of the Colorado River to determine suitability (Grand Canyon National Park - Arizona; General Management Plan, September, 1993).

Mining is a major component of the Arizona economy. Access to mineral resources on public lands is an important part of the Arizona minerals industry.

Congressional designation of the river segments recommended in the recommended alternative for a Wild classification would withdraw 8,230 acres from new mineral entry. One of these segments (covering 2,630 acres) has a moderate-to-high locatable mineral potential. Two other segments (4,360 acres) have a moderate locatable mineral potential. The remaining two segments (1,240 acres) have low-to-moderate locatable mineral potential.

Conclusion

The recommended alternative would have a minor adverse cumulative effect on minerals development.

Cumulative Impacts on Tourism

Wilderness areas and wild and scenic rivers have a tourism value for the counties and state.

In the past, legislative action has created wilderness areas that covering 4,537,864 acres of federal land in Arizona. Four agencies manage these wilderness areas: the Bureau of Land Management (1,405,750 acres), the U.S. Forest Service (1,344,970 acres), the U.S. Fish and Wildlife Service (1,343,444 acres), and the National Park Service (443,700 acres).

In 1984 Congress also designated portions of the Verde River in Arizona that are managed by the U.S. Forest Service as a wild and scenic river.

Currently, the Bureau of Land Management recommended alternative has determined that 74,860 acres of federal land in Arizona are suitable and recommends these areas to Congress for designation into the National Wild and Scenic Rivers System.

The U.S. Forest Service has issued a Resource Information Report providing information on potential wild, scenic, and recreational rivers in six National Forests in Arizona (September, 1993). The Resource Information Report identifies 53 river areas totalling approximately 843 miles as potentially eligible for designation.

There is a possibility that, in the foreseeable future, some of the rivers identified by the U.S. Forest Service as potentially eligible will be included in a legislative bill introduced by Congress. If no bill is introduced, the U.S. Forest Service will complete the wild and scenic river evaluation through its planning process.

The U.S. Fish and Wildlife Service also has identified an 11-mile segment of the Bill Williams River as potentially eligible for inclusion into the National Wild and Scenic River System. This segment also could be included in a Congressional legislative bill. If it is not, the

U.S. Fish and Wildlife Service will incorporate the wild and scenic river evaluation into its planning process.

In addition, the National Park Service will study the Grand Canyon portion of the Colorado River to determine suitability (Grand Canyon National Park - Arizona; General Management Plan, September, 1993).

The protection of the public lands through legislative designation is considered to be a positive action. As evidence of this, Congress enacted the Wild and Scenic Rivers Act in 1969 in order to preserve and protect selected rivers for their outstandingly remarkable values and "for the benefit and enjoyment of future generations" (P.L. 90-542, Sec 1(b)).

Conclusion

Implementing the recommended alternative determining suitability and recommending designation for the 14 river areas covering 74,860 acres would result in a minor beneficial cumulative impact on tourism.

Irreversible and irretrievable commitments of resources involved in the recommended alternative

There would be no irreversible and irretrievable commitments of resources associated with implementation of the recommended alternative. The Wild and Scenic Act would provide legislative protection. However, legislative actions are not irreversible and irretrievable.

Unavoidable adverse effects

Implementation of the recommended alternative would have no unavoidable adverse effects.

Short-term uses of the environment versus longterm productivity

Under the recommended alternative, all shortterm uses would continue and future

development options not restricted by other management actions would remain open.

IMPACTS FROM IMPLEMENTING THE ALL SUITABLE ALTERNATIVE

The all suitable alternative determines suitability and recommends Congressional designation for all 20 eligible river study areas (40 segments covering 103,061 acres) into the National Wild and Scenic Rivers System.

There are two types of management actions in this alternative. Wild and scenic river management actions implement recommended wild and scenic river designations. The other type is the ongoing management actions described in Chapter 2. These ongoing management actions are associated with wilderness areas, riparian national conservation areas, areas of critical environmental concern, and Resource Management Plans. The ongoing management actions would supplement the protection provided by wild and scenic river designations.

Outstandingly Remarkable Values

Under the all suitable alternative, the outstandingly remarkable values in the river segments determined sultable and recommended for designation would receive long-term legislative protection under the Wild and Scenic Rivers Act.

Impacts on Outstandingly Remarkable Scenic Values

In the eligibility evaluation, 15 river study areas were regarded to have outstandingly remarkable scenic values.

Implementation of the all suitable alternative would protect the outstandingly remarkable scenic values on 34 segments of 15 rivers encompassing 87,500 acres. In 11 river study areas (42,518 acres) 14 segments are proposed for a Wild designation. The remaining 19

segments (44,472 acres) are proposed for either Scenic or Recreational designations.

The outstandingly remarkable scenic values include canyons, mountain slopes, rolling hills, and broad river channels. Many of the areas offer exceptional opportunities for sightseeing and photography. Riparlan forests and heavy stands of vegetation offer sharp contrasts in areas where the surrounding vegetation is dominated by desert shrubs.

Mineral entry, leasing, and materials sales would be legislatively prohibited on 10,997 acres of the Wild segments in six river study areas (Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, and Santa Maria River). Prohibiting mineral entry would protect the outstandingly remarkable scenic values by preventing surface disturbances from new mining activities in the river corridors. Approved plans of operation would be required for all mining related activities above casual use.

Patents would be restricted to the mineral estate on 33,740 acres in 12 river study areas: Agua Fria River, Big Sandy River, Bill Williams, Burro Creek, Gila River: Gila Box, Francis Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, Santa Maria River, Turkey Creek, and Virgin River. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances.

New roads would be prohibited on 11,037 acres outside of wilderness areas in Wild segments in six river study areas (Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, Santa Maria River). Motorized travel also would be restricted in these study areas.

CHAPTER 4

REVER STUDY	AGUA	ARA-	PIG.	BELL	BURRO	PRANCIS	GELA	HASSA.	L SAN	MID	PARIA	SAN	BANTA	TURKEY	VIRGIN	BLM
AREAR	TRIA	VAIPA	SANDY	WLMS	CRUZIC	CREEK	BOX	YAMPA	FRAN-	CILA		FEDRO	MARIA	CREEK		PUBLIC
									CIECO							LAND
BLM Public Land Acres	6710	3200	4220	4650	9460	1360	7460	6386	1874	6130	8960	12256	7080	1100	9344	901
Wild Segments	5320	3200	2190	4164	6570	0	4250	3246	740	2630	8960	0	3520	o	928	457
No Roeds in Wild Segs	5320		0	0	3347	0	0	200	740	390	0	0	1040	o	0	110
No New Mineral Entry	5320		0	0	3347	0	0	200	700	390	0	o	1040	0	0	109
No Surface Patent	6710		1637	486	6237	880	1410	2860	1834	3890	0	Q	2810	730	4256	337
Motorized Use Restricted	5320		0	0	3347	0	0	200	740	390	0	0	1040	Ó	0	110
No Dams or Diversions	6710	3200	4220	4650	9460	1360	7460	6386	1874	6130	8960	12256	7080	1100	9344	901
Acres covered in outstandi																
	-		•	•	•											
WLDR/RNCA	0	3200	2583	4164	3223	480	6050	3526	40	2240	8960	12256	4270	370	5088	564
ACEC	2160		1009	486	4933	480	0	0	0	0	0	1120	1060	560	4256	160
Miles Closed	1		0	0	0	0	25	0	0	0	0	0	0	0	0	
Existing Roads	1390		628	0	1760	400	0	2600	1134	3500	0	0	690	730	O	128
Designated Roads	0		1009	486	1130	480	3210	0	0	0	0	12256	0	0	4256	228
No Surface Occupancy	1390		1009	486	. 1130	480	0	2660	1134	3500	0	0	2810	730	4256	195
Protection of Nests	0		1009	486	4933	480	0	0	0	0	0	0	1060	o	0	79
Brosion Control	0		0	0	0	0	0	0	0	0	0	38	0	0	0	
Cottonwood Planting	670		0	100	0	0	0	660	0	0	0	1120	0	0	0	25
No Woodcutting	0		0	0	0	0	550	. 0	0	3890	0	0	0	560	9344	143
Dead/Down Wood Only	0		0	0	0	0	0	0	0	0	0	0	320	0	4256	45
No Native Plant Removal	0		1009	486	1130	480	0	0	0	0	0	0	320	0	0	34
Salt Cedar Removal	0	3200	420	510	0	0	0	0	0	610	0	710	0	0	0	54
Pencing	0		0	5	0	0	0	0	6	0	0	0	0	o	0	
Unique Waters Monitorin	0		0	0	31	4	0	0	6	0	0	10	0	0	0	
New Water Sources	0		5	5	5	5	5	5	0	0	0	0	5	0	0	
Camp Outside Riparian	0		1009	486	4933	480	0	0	0	0	0	0	1060	o	0	79
Helicopter Restrictions	0		1009	486	4933	480	. 0	0	0	0	0	0	1060	0	0	79
Total acres (BLM/Private/C	Other) co	overed b	y outsta	ndinaly	remerket	de portio	3									
Total Acres	7160	3200	8730	6357	15650	3560	7960	9462	2464	8515	8960	14720	12000	1100	11040	1208
Private	450		4510	524	3350	1670	500	600	590	1505	0	2464	2430	0	1632	202
State/Other	0		0	703	2840	530	0	2476	0	880	o	0	2490	o	64	99
RMP Planned Acquisition	120	0	4510	800	6042	400	_		_	2205	_	_	50	-		

Prohibiting new roads and restricting motorized travel would protect the outstandingly remarkable scenic values from vehicle use and impacts in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities.

In six river study areas with Wild segments (10,997 acres) new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable scenic values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the 14 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable scenic values.

Under the all suitable alternative dams, levees. and other types of diversions would be prohibited on approximately 284 riparian miles of 14 rivers. This action would protect the outstandingly remarkable scenic values by maintaining natural landscapes and stream flows. The outstandingly remarkable scenic values also on 33 segments and riparian miles along 14 rivers. With Congressional designation and Bureau of Land Management implementation, the outstandingly remarkable scenic values would be legislatively protected from possible inundation by the Alamo Reservoir on two segments and up to 7,000 acres along approximately 24 riparian miles of the Big Sandy and Santa Maria rivers.

The outstandingly remarkable scenic values also would receive protection from the ongoing

management actions described in Chapter 2.

Conclusion

Implementation of the all sultable alternative would have no adverse impacts on outstandingly remarkable scenic values on approximately 87,500 acres (33 segments) of the 15 river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable scenic values.

Impacts on outstandingly remarkable recreational values

Nine of the 20 eligible wild and scenic river study areas contain outstandingly remarkable recreational values.

The nine rivers are determined to be suitable in the all suitable alternative. The nine rivers cover about 58,320 acres in 21 separate segments. Ten segments (28,820 acres) would be Wild; all or portlons of five of these are outside of wilderness areas or riparlan national conservation areas. The remaining 11 would be either Scenic or Recreational (29,600 acres).

The outstandingly remarkable recreational values include hiking, backpacking camping, horseback riding, sightseeing, wildlife observation, hunting, fishing, photography, rock climbing, swimming, rafting, kayaking, canoeing, and geologic, ecologic, off highway vehicle use and cultural resource observation and interpretation. Visitor use figures range from annual usages that are very low (Wright Creek) to the very popular Aravaipa, Burro Creek, and San Pedro River areas.

Table 3-6 in Chapter 3 summarizes the primary types of recreation associated with each study area. In addition, visitors are attracted by archaeological and historic resources. There are numerous opportunities for photographic and artistic projects.

TABLE 4-AS2: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE RECREATION VALUES

RIVER STUDY	ARA-	BILL	BURRO	GILA	L. SAN	PARIA	SAN	TURKEY	VIRGIN	BLM
AREAS	VAIPA	WLMS	CREEK	BOX	FRAN-		PEDRO	CREEK		PUBLIC
					CISCO					LAND
BLM Public Land Acres	3200	4650	9460	7460	1874	8960	12256	1100	9344	58304
Wild Segments	32 00	4164	6570	4250	740	8960	0	0	928	28812
No Roads in Wild Segs	0	0	3347	0	740	0	0	0	O	4087
No New Mineral Entry	0	0	3347	0	700	0	0	0	0	4047
No Surface Patent	0	486	6237	1410	1834	0	0	730	4256	14953
Motorized Use Restricted	0	0	3347	0	740	0	O	0	0	4087
No Dams or Diversions	3200	4650	9460	7460	1874	8960	12256	1100	9344	58304
Acres covered in outstanding	ly remark	able por	ion by ma	nageme	nt action	s commo	on to all a	lternatives		
WLDR/RNCA	3200	4164	3223	6050	40	8960	12256	370	5088	43351
ACEC	0	486	4933	0	0	0	1120	560	4256	11355
Miles Closed	0	0	0	25	0	0	0	0	0	25
Existing Roads	0	0	1760	0	1134	0	0	730	0	3624
Designated Roads	0	486	1130	3210	0	0	12256	0	4256	21331
No Surface Occupancy	0	486	1130	0	1134	0	0	730	4256	7736
Protection of Nests	0	486	4933	0	0	0	0	0	0	5419
Erosion Control	0	0	0	0	0	0	38	0	0	31
Cottonwood Planting	0	100	0	0	0	0	1120	O	0	1220
No Woodcutting	0	0	0	550	0	0	0	560	9344	10454
Dead/Down Wood Only	0	0	0	0	0	0	0	0	4256	4256
No Native Plant Removal	0	486	1130	0	0	0	0	0	0	1616
Salt Cedar Removal	3200	510	0	0	0	0	710	0	0	4420
Fencing	0	5	0	0	6	0	0	0	0	1.1
Unique Waters Monitoring	10	0	31	0	6	0	10	0	0	51
New Water Sources	0	5	5	5	0	0	0	0	0	1:
Camp Outside Riparian	0	486	4933	0	0	0	0	0	0	5419
Helicopter Restrictions	0	486	4933	0	0	0	0	0	0	5419
Total acres (BLM/Private/O	her) cove	red by or	ıtstanding	ly remar	kable po	rtion				
Total Acres	3200	6357	15650	7960	2464	8960	14720	1100	11040	7145
Private	0	524	3350	500	590	0	2464	0	1632	9060
State/Other	0	703	2840	0	0	0	0	0	64	3601
RMP Planned Acquisition	0	800	6042	500	590	0	480	0	1596	1000

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 4,047 acres in on the Wild segments of two river study areas (Burro Creek, Lower San Francisco River). This is in addition to those already withdrawn under wilderness area and riparian national conservation area provisions. This prohibition would eliminate any threat to the outstandingly remarkable recreational values from mining operations.

Patents would be restricted to the mineral estate on 14,953 acres in six study areas (Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Turkey Creek, and Virgin River). This action would preserve the surface in federal ownership and management. Although mining activities could alter the landscape and affect outstandingly remarkable recreational values, reclamation is required, and would mitigate surface disturbances.

New roads would be prohibited on 4,047 acres outside of wilderness areas in Wild segments in two river study areas (Burro Creek, Lower San Francisco River). Motorized travel also would be restricted in these two study areas. Prohibiting new roads and restricting motorized travel would protect the outstandingly remarkable recreational values from any impacts from, or conflicts with vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to upland areas for other recreation, scientific, minerals development, or other activities.

In three river study areas with Wild segments outside wilderness areas and riparian national conservation areas (4,047 acres), new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable recreational values;

however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Instream flow assessments on the nine study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable recreational values.

Under the all suitable alternative dams, levees, and other types of diversions would be prohibited on approximately 198 riparian miles of nine rivers. This action would protect the outstandingly remarkable recreational values on 21 segments by maintaining natural landscapes and stream flows.

The ongoing management actions described in Chapter 2 also would protect the outstandingly remarkable recreational values.

Conclusion

implementation of the all suitable alternative would have no adverse impacts on outstandingly remarkable recreational values on approximately 58,800 acres (21 segments) of the nine river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable recreational values.

Impacts on outstandingly remarkable geologic values

Outstandingly remarkable geologic values are found in three of the 20 river study areas. Over 15,000 acres in two these river study areas are in wilderness areas or riparian national conservation areas and have long-term legislative protection.

TABLE 4-AS3 MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE GEOLOGIC VALUES

REMARK	ABLE	<u>GEOL</u>	OGIC	VALUI
RIVER STUDY	GILA	L. SAN	PARIA	BLM
AREAS	BOX	FRAN-		PUBLIC
		CISCO		LAND
BLM Public Land Acres	7460	1874	8960	18294
Wild Segments	4250	740	8960	13950
No Roads in Wild Segs	0	740	٥	740
	_			
No New Mineral Entry	0	700	0	700
N. C. C. D.			_	
No Surface Patent	1410	1134	0	2544
BALALINATE DIAGO	_	e 40	_	5 40
Motorized Use Restrictions	0	740	0	740
No Dama or Distantions	7160	1974	9040	19204
No Dams or Diversions Acres covered in outstandingle	7460	1874	8960	18294
Meres covered in outstandings management actions common				
WLDR/RNCA	6050	40	8960	15050
ACEC	0	0	0	0
Miles Closed	25	0	0	25
Existing Roads	0	1134	0	1134
Designated Roads	3210	0	٥	3210
No Surface Occupancy	0	1134	0	1134
Protection of Nesta	0	0	0	0
Erosion Control	0	0	0	0
Cottonwood Planting	0	0	0	0
No Woodcutting	550	0	0	550
Dead/Down Wood Only	0	0	0	0
No Native Plant Removal	0	0	0	Ó
Salt Cedar Removal	0	0	0	0
Fencing	0	. 6	0	6
Unique Waters Monitoring	0	6	0	6
New Water Sources	5	0	0	5
Camp Outside Riparian	0	0	0	0
Helicopter Restrictions	0	0	0	0
Total acres (BLM/Private/Otl	ner) cover	ed by		
outstandingly remarkable port	Lion			
Total Acres	7960	2464	8960	19384
Private	500	590	0	1090
State/Other	0	0	0	0
RMP Planned Acquisitions	500	590	0	1090

Patents would be restricted to the mineral estate on 2,544 acres in the Gila River: Gila Box and Lower San Francisco River study areas. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and would mitigate surface disturbances.

Under the all suitable alternative dams, levees, and other types of diversions would be prohibited on approximately 59 riparian miles. This action would protect the outstandingly remarkable geologic values on the riparian miles along three rivers by maintaining natural landscapes and stream flows.

Conclusion

Implementation of the all suitable alternative would have no adverse impacts on outstandingly remarkable geologic values on approximately 18,300 acres (six segments) of the three river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable geologic values.

Impacts on outstandingly remarkable fish and wildlife habitat and equatic habitat values

Fish and wildlife habitat and aquatic habitat were identified as outstandingly remarkable values in of the 20 river study areas.

Under the all sultable alternative, 18 segments (50,228 acres) in 14 river study areas are determined suitable and recommended for designation with a Wild classification. The remaining 53,313 acres would be recommended for designation with a Scenic or Recreational

classification. Tables 3-7 and 3-8 in Chapter 3 provide details on fish and wildlife populations and riparian vegetation by river Area for each of the 20 river study areas.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 12,597 acres in Wild segments of seven study areas (Agua Fria River, Burro Creek, Hassayampa River, Hot Springs, Lower San Francisco River, Middle Gila River and Santa Maria River) with an estimated potential for locatable minerals in addition to those already withdrawn under wilderness area and riparian national conservation area provisions. This prohibition would eliminate any threat to the outstandingly remarkable fish, and wildlife habitat and aquatic habitat values from new mining operations.

Patents would be restricted to the mineral estate on 41,671 acres in 14 study areas: Agua Fria River, Big Sandy River, Bill Williams River, Burro Creek, Cienega Creek, Francis Creek, Gila River: Gila Box, Hassayampa River, Hot Springs Canyon, Lower San Francisco River, Middle Gila River, Santa Maria River, Virgin River and Wright Creek. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and would mitigate surface disturbances.

New roads would be prohibited on 12,637 acres outside of wilderness areas in segments recommended as Wild In seven river study areas (Agua Fria River, Bill Williams River, Burro Creek, Hassayampa River, Hot Springs Canyon, Lower San Francisco River, Middle Gila River, Santa Maria River). Motorized travel would be restricted in these eight study areas.

RIVER STUDY	AGUA	ARA-	Mic	RILL	BOPETA	BURRO	CIE-	FRANCIS	GHLA	Hassa-	HOT	l san	MOD	PARIA	SAN	SANTA	EWAMP	VIRGIN	MAGGHI	BLM
AREAS	PHIA	VAIPA	SANDY	WLMS	CHEEK	CREEK	NEGA	CRIEK	BOX	YAMPA	SPRINGS	FRAK-	GELA		PEDRO	MARIA	SPRINGS		CHERK	PUBLIC
												CISCO								LARD
BLM Public Land Acres	6710	3200	4220	4650	3570	9460	3200	1360	7460	6386	1600	1874	6130	896 0	12256	7080	640	9344	3861	1019
Wild Segments	5320	3200	2190	4164	0	6570	0	0	4250	3246	1600	740	2630	8960	0	5310	640	928	Û	497
No Roads in Wild Segs	5320	0	0	0	0	3347	0	0	0	200	1600	740	390	0	0	1040	0	0	0	126
No New Mineral Entry	5320	0	0	0	0	3347	0	0	0	200	1600	700	390	0	0	1040	0	0	0	125
No Surface Palent	6710	0	1637	486	0	6237	3200	880	1410	2860	1600	1834	3890	0	0	2810	0	4256	3861	416
Motorized Use Restricted	5320	0	0	0	0	3347	0	0	0	200	1600	740	390	0	0	1040	0	C	0	126
No Dame or Diversions	6710	3200	4220	4650	3570	9460	3200	1360	7460	6386	1600	1874	6130	8960	12256	7080	640	9344	3861	1019
Acres covered in outstandingly									,											
WLDR/RNCA	0	3200	2583	4164	3570	3223	0	480	6050	3525	0	40	2240	8960	12256	4270	640	5088	¢	602
ACEC	2160	0	1009	486	0	4933	0	480	0	0	1600	0	0	0	1120	1060	0	4256	3861	209
Miles Closed	1	o	0	0	11	0	5	0	25	0	0	0	0	0	0	0	0	0	0	
Existing Roads	1390	Ů	628	Ô	0	1760	3200	400	0	2600	0	1134	3500	0	0	690	0	0	3861	191
Designated Roads	0	n	1009	486	3570	1130	0	480	3210	0	0	0	0	0	12256	0	0	4256	0	263
No Surface Occupancy	1390	0	1009	486	0	1130	3200	480	0	2660	1600	1134	3500	0	0	2810	0	4256	3861	275
Protection of Nests	0	0	1009	486	0	4933	0	480	0	0	0	0	0	0	0	1060	0	0	0	79
Erosion Control	0	0	0	0	0	0	1	0	0	0	0	0	0	0	38	0	0	0	Q	
Cottonwood Planting	670	0	0	100	0	0	0	0	0	660	0	0	0	0	1120	0	0	0	0	25
No Woodcutting	0	0	0	0	150	0	3200	0	550	0	1600	0	3890	0	0	0	0	9344	0	187
Dead/Down Wood Only	0	0	0	0	0	0	3200	0	0	0	0	0	0	0	0	320	0	4256	0	77
No Native Plant Removal	0	0	1009	486	0	1130		480	0	0	0	0	0	0	0	320	0	0	3861	72
Salt Cedar Removal	0	3200	420	510	0	0	0	0	0	0	0	0	610	0	710	0	0	0	0	54
Fencing	0	0	0	5	10		0	0	0	0	0	6	0	0	0	0	0	0	7	
Unique Waters Monitoring	0	10	0	0	10	31	0	4	0	0	5	6	0	0	10	0	2	0	7	
New Water Sources	0	0	5	5	1	5	0	5	5	5	0	0	0	0	0	5	0	0	1	
Camp Outside Riparian	0	0	1009	486	3570	4933	0	480	0	0	0	0	0	0	0	1060	0	0	0	115
Helicopter Restrictions	0	0	1009	486	0	4933	0	480	0	0	0	0	0	0	0	1060	0	. 0	0	75
Total acres (BLM/Private/Oth		ed by ou			rkable po	rtion														
Total Acres	7160	3200	8730	6357	4540	15650	3360	3560	7960	9462	1920	2464	8515	8960	14720	12000	800	11040	4032	1344
Private	450	0	4510	524	970	3350		1670	500	600	160	590	1505	0	2454	2430	0	1632	171	215
State/Other	n	á	0	703	0			530	0	2476	160	0	880	0	0	2490	160	64	0	104
RMP Planned Acquisitions	120	0	4510	800	490			400	500	1040	160	590	2205	0	480	610	160	1596	170	200

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Prohibiting new roads and restricting motorized travel would protect the outstandingly remarkable fish and wildlife and aquatic habitat values from vehicle use and impacts in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities

In seven river study areas with Wild segments (12,397 acres) outside wilderness areas and riparian national conservation areas, new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable fish and wildlife habitat values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Instream flow assessments on the 19 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable fish and wildlife and aquatic habitat values.

Under the all suitable alternative dams, levees, and other types of diversions would be prohibited on 331 riparian miles. This action would protect the outstandingly remarkable fish and wildlife habitat values on 39 segments and riparian miles along 19 rivers by maintaining natural landscapes and stream flows.

The ongoing management actions described in Chapter 2 also would protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Conclusion

Implementation of the all suitable alternative

would have no adverse impacts on outstandingly remarkable fish and wildlife and aquatic habitat values on approximately 102,000 acres (39 segments) of the 19 river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Impacts on outstandingly remarkable cultural, historic, and paleontologic resource values

Eighteen of the 20 eligible river study areas are known to contain prehistoric and historic archaeological sites. Nine of these are regarded as having outstandingly remarkable cultural resource values. Details of these nine areas are shown in Table 3-9, Chapter 3. Prehistoric sites are present in all of the areas; six contain historic sites.

The all sultable alternative determines as suitable and recommends for designation all nine river study areas containing 17 segments (55,250 acres). Five study areas (25,840 acres) would be recommended for designation with a Wild classification; segments in the remaining four study areas (29,410 acres) would be recommended for a Scenic or Recreational classification.

Outstandingly remarkable cultural resource values in nine of the study areas are rare and significant but nonetheless threatened by damage from erosion and human activities such as vandalism and off-road vehicle traffic.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 9,367 acres on three study areas: Agua Fria River, Burro Creek and Lower San Francisco River. This prohibition would eliminate any threat or conflict to the outstandingly remarkable cultural, historic, and paleontologic values from new mining operations.

Patents would be restricted to the mineral estate

on 20,782 acres in slx study areas (Agua Fria River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Turkey, and Wright Creek). This would be in addition to restrictions in wilderness areas and riparian national conservation areas. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, scientific data recovery reclamation would be required to mitigate surface disturbances.

New roads would be prohibited on 9,407 acres outside of wilderness areas in segments recommended as Wild in three river study areas (Agua Fria River, Burro Creek, Lower San Francisco River). Motorized use would be restricted in these three study areas. The prohibition on new roads and restricting motorized use would protect the outstandingly remarkable cultural, historic, and paleontologic values from vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities.

In portions of three river areas with segments (9,367 acres) outside wilderness areas, new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable cultural, historic, and paleontologic values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

In the five river study areas (25,840 acres) cultural resources would be inventoried; site protection strategies involving fencing, monitoring, or stabilization would be developed.

Research would be encouraged and selected sites would be interpreted for public visitation.

The outstandingly remarkable cultural, historic, and paleontologic values also would be protected by the ongoing management actions described in Chapter 2.

Proposed activities that could result in increased use or surface disturbance in nine river study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed.

Sites evaluated as eligible for the National Register of Historic Places, in consultation with the State Historic Preservation Officer, would normally be avoided by the proposed activity. However, if avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.

Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism.

Conclusion

Implementation of the all suitable alternative would have no adverse impacts on outstandingly remarkable cultural resource, historic, and paleontologic values on approximately 55,250 acres (17 segments) of the nine river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable cultural resource, historic, and paleontologic values.

CHAPTER 4

TABLE 4-AS5: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE CULTURAL, HISTORIC AND PALEONTOLOGIC VALUES

Liver Study Areas	AGUA FRIA	BONITA CREEK	BURRO CREEK	GILA BOX	L. SAN FRAN- CISCO	PARIA	SAN PEDRO	TURKEY CREEK	WRIGHT CREEK	BLM PUBLIC LAND
BLM Public Land Acres	6710	3570	9460	7460	1874	8960	12256	1100	3861	55251
Wild Segments	5320	0	6570	4250	740	8960	0	0	0	25840
No Roads in Wild Segs	5320	0	3347	0	740	0	0	0	0	9407
No New Mineral Entry	5320	0	3347	0	700	0	0	0	0	9367
No Surface Patent	6710	o	6237	1410	1834	0	0	730	3861	20782
Motorized Use Restricted	5320	0	3347	0	740	0	0	0	0	9407
No Dams or Diversions	6710	3570	9460	7460	1874	8960	12256	1100	3861	55251
WLDR/RNCA ACEC	0 2160	3570 0	3223 4933	6050 0	40 0	8960 0	12256 1120	370 560	0 3861	34469 12634
	_									
Miles Closed	1.	11	0	25	0	0	0	0	0	37
Existing Roads	1390	. 0	1760	0	1134	0	0	730	3861	8875
Designated Roads	0	3570	1130	3210	0	0	12256	0	0	20166
_	1390	0	1130	0	1134	0	0	730	2061	8245
No Surface Occupan⊄y							_	,,,,	3861	0473
	0	0	4933	0	0	0	0	0	3801	4933
Protection of Nests	0 0	0 0	4933 0	0		0	_			
Protection of Nests Erosion Control	_	_		_	0	•	0	0	0	4933
Protection of Nests Erosion Control Cottonwood Planting	0	0	0	0	0	o	0 38	0 0	0 0	4933 38
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting	0 670	0	0 0	0	0 0 0	0	0 38 1120	0 0 0	0 0 0	4933 38 1790
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only	0 670 0	0 0 150	0 0 0	0 0 550	0 0 0	0	0 38 1120 0	0 0 0 560	0 0 0	4933 38 1790 1260
Protection of Nests Brosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal	0 670 0	0 0 150 0	0 0 0	0 0 550 0	0 0 0 0	0	0 38 1120 0 0	0 0 0 560 0	0 0 0 0	4933 38 1790 1260 0
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal	0 670 0 0	0 0 150 0	0 0 0 0 1130	0 0 550 0	0 0 0 0	0 0	0 38 1120 0 0	0 0 0 560 0	0 0 0 0 3861	4933 38 1790 1260 0 4991
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Saft Cedar Removal Fencing	0 670 0 0 0	0 0 150 0 0	0 0 0 0 1130 0	0 0 550 0 0	0 0 0 0 0	0 0 0	0 38 1120 0 0 0 710	0 0 560 0 0	0 0 0 0 0 3861	4933 38 1790 1260 0 4991 710
Protection of Nests Brosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring	0 670 0 0 0	0 0 150 0 0 0	0 0 0 0 1130 0	0 0 550 0 0 0	0 0 0 0 0 0	0 0 0	0 38 1120 0 0 0 710	0 0 560 0 0 0	0 0 0 0 3861 0 7	4933 38 1790 1260 0 4991 710 23
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources	0 670 0 0 0 0	0 0 150 0 0 0 10	0 0 0 1130 0 0 31	0 0 550 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0	0 38 1120 0 0 0 710 0	0 0 560 0 0 0	0 0 0 0 3861 0 7	4933 38 1790 1260 0 4991 710 23
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Saft Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions	0 670 0 0 0 0 0 0	0 0 150 0 0 0 10 10 11 3570	0 0 0 1130 0 0 31 5 4933	0 0 550 0 0 0 0 0 5 0	0 0 0 0 0 0 0 6 6 6	0 0 0 0 0 0 0	0 38 1120 0 0 0 710 0	0 0 560 0 0 0 0	0 0 0 0 3861 0 7 7	4933 38 1790 1260 0 4991 710 23 64
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Saft Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions	0 670 0 0 0 0 0 0	0 0 150 0 0 0 10 10 11 3570	0 0 0 1130 0 0 31 5 4933	0 0 550 0 0 0 0 0 5 0	0 0 0 0 0 0 0 6 6 6	0 0 0 0 0 0 0	0 38 1120 0 0 710 0 10	0 0 560 0 0 0 0	0 0 0 0 3861 0 7 7	4933 38 1790 1260 0 4991 710 23 64 12 8503
No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Saft Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total acres (BLM/Private/Ott	0 670 0 0 0 0 0 0	0 0 150 0 0 0 10 10 11 3570	0 0 0 1130 0 0 31 5 4933	0 0 550 0 0 0 0 0 5 0	0 0 0 0 0 0 0 6 6 6	0 0 0 0 0 0 0	0 38 1120 0 0 710 0 10	0 0 560 0 0 0 0	0 0 0 0 3861 0 7 7	4933 38 1790 1260 0 4991 710 23 64 12 8503
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total acres (BLM/Private/Ott	0 670 0 0 0 0 0 0 0 0	0 0 150 0 0 0 10 10 1 3570 0 red by out	0 0 0 1130 0 0 31 5 4933 4933 standingly	0 0 550 0 0 0 0 0 5 0 0 7960	0 0 0 0 0 0 6 6 0 0	0 0 0 0 0 0 0 0 0	0 38 1120 0 0 710 0 10 0	0 0 560 0 0 0 0 0	0 0 0 0 3861 0 7 7 1 0	4933 38 1790 1260 0 4991 710 23 64 12 8503 4933
Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total acres (BLM/Private/Ot	0 670 0 0 0 0 0 0 0 0 0	0 0 150 0 0 0 10 10 1 3570 0	0 0 0 1130 0 0 31 5 4933 4933	0 0 550 0 0 0 0 0 5 0 0	0 0 0 0 0 0 6 6 0 0 0	0 0 0 0 0 0 0 0 0 0 0	0 38 1120 0 0 710 0 10 0 0	0 0 0 560 0 0 0 0 0 0	0 0 0 0 3861 0 7 7 1 0 0	4933 38 1790 1260 0 4991 710 23 64 12 8503 4933

Impacts on outstandingly remarkable hydrologic values

Two river study areas (9,340 acres) have outstandingly remarkable hydrologic values. Portions of both river study areas (6,090 acres) are within the Gila Box Riparian national conservation area established by Congress in 1990. The outstandingly remarkable hydrologic values are identified with perennial natural water flow in an otherwise semi-arid desert environment.

Currently, water rights in the area are under a complex state and federal water rights litigation process that eventually will determine stream flow quantities. The most likely scenario is that senior water rights will be located downstream assuring continued flow in the Gila River: Gila Box.

Where not already initiated, instream flow assessments on the two study areas would be

conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable hydrologic values.

Under the all suitable alternative, dams, levees, and other types of diversions would be prohibited on approximately 32 riparian miles. This action would profect the outstandingly remarkable hydrologic values on the two rivers by maintaining natural landscapes and stream flows.

Conclusion

Implementation of the all suitable alternative would have no adverse impacts on outstandingly remarkable hydrologic values on approximately 9,340 acres (5 segments) of the two river study areas with those values. A beneficial impact would result from long-term legislative protection of the outstandingly remarkable hydrologic values.

TABLE 4-AS6: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE HYDROLOGIC VALUES

REMARKABLE	HYD	ROLO	GIC VA
RIVER STUDY	GILA	L SAN	BLM
AREAS	BOX	Fran-	PUBLIC
		CISCO	LAND
BLM Public Land Acres	7460	1874	9334
Wild Segments	4250	740	4990
No Roads in Wild Segs	0	740	740
No New Mineral Entry	0	700	700
No Surface Patent	1410	1834	3244
Motorized Use Restricted	0	740	740
No Dams or Diversions	7460	1874	9334
Acres covered in outstanding		_	
management actions common	ı to all ai t	crnative	8
WLDR/RNCA	6050	40	6090
ACEC	0	0	
Miles Closed	25	0	25
Existing Roads	0	1134	1134
Designated Roads	3210	0	3210
No Surface Occupancy	0	1134	1134
Protection of Nests	0	0	0
Erosion Control	0	0	0
Cottonwood Planting	0	0	0
No Woodcutting	550	0	550
Dead/Down Wood Only	0	0	0
No Native Plant Removal	0	0	0
Salt Cedar Removal	0	0	0
Fencing	0	6	6
Unique Waters Monitoring	0	6	6
New Water Sources	5	0	5
Camp Outside Riparian	0	0	0
Helicopter Restrictions	0	0	0
Total acres (BLM/Private/O	her) cove	red by	
outstandingly remarkable po	rtion		
Total Acres	7960	2464	10424
Private	500	590	1090
State/Other	0	0	0
RMP Planned Acquisition	500	590	1090

- Impacts on Minerals Development

Locatable mineral potential exists in 34 of the 40 study area segments (95,285 acres) identified as eligible for inclusion in the National Wild and Scenic Rivers System. There is no mineral

potential for locatable minerals in four wild and scenic river study area segments (7,776 acres). These are the Bill Williams River (2 segments, 2,336 acres), Hot Springs Canyon (1 segment, 1600 acres), and Swamp Springs (1 segment, 640 acres).

TABLE 4-ASMN1 SEGMENTS WITH MINERAL POTENTIAL

	1	<u> </u>	1	1	
River Study Area	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5
Agua Fria River	L; 1390ac; Scenic	M; 5320ac; Wild			
Aravaipa Creek	L; 3200ac; Wild				
Big Sandy River	L-M; 2030ac; Scenic	L-M; 2190ac; Wild			
Bill Williams River	L-M; 2314ac; Wild	N; 486ac; Scenic	N; 1850ac; Wild		
Bonita Creek	L; 3570ac; Recreation				
Burro Creek	L; 1190ac; Wild	L-M; 2750ac; Wild	H; 630ac; Recreation	M-H; 2030ac; Wild	M; 1130ac; Scenic
Cienega Creek	N; 1260ac; Scenic	N; 1920ac; Scenic			
Francis Creek	L; 1360ac; Recreation				
Gila River: Gila Box	L; 1940ac; Scenic	L; 4250ac; Wild	N-L; 1270ac; Scenic		
Hassayampa River	M-H; 250ac; Recreation	M-H; 3246ac; Wild	M-H; 2890ac; Recreation		
Hot Springs	N; 1600ac; Wild				
Gila Box: Lower San Francisco River	L; 1134; Recreation	L; 740; Wild			
Middle Gila River	M; 580ac; Recreation	M; 2630ac; Wild	M; 1760ac; Recreation		
Parle River	L-H; 8960ac; Wild				
San Pedro River	L/M; 12256ac; Recreation				
Santa Maria River	L/M; 5310ac; Wild	L-M; 1770ac; Scenic			
Swamp Springs	N; 640ac; Wild				
Turkey Creek	L; 1100ac; Recreation				
Virgin River	L; 926ac; Wild	L; 2336ac; Scenic	L; 236Bac; Recreation	L; 3712ac; Recreation	
Wright Creek	L; 3861ac; Scenic				

The all suitable alternative includes all 20 river study areas containing 40 segments. Thirty-four have a locatable minerals potential. Fourteen

segments would be recommended as Wild; the remaining 20 would be recommended as Scenic or Recreational.

TABLE 4-ASMN2 RIVER AREA WILD SEGMENT MINERAL WITHDRAWALS

River Study Area	Segment 1	Segment 2	Segment 4
Agua Fria River		Moderate; 5320 acres	
Aravaipa Creek	Low; WLDR Withdraw		
Big Sandy River		Low/Moderate; WLDR Withdraw	101
Bill Williams River	Low; WLDR Withdraw		
Burro Creek	Low; 717 sc (473 additional in WLDR)	Low/Moderate; WLDR Withdraw	Moderate/High; 2630 sc
Gila Box: Gila River		Low; RNCA Withdraw	
Hassayampa River		Moderate/High; 200ac	
Gila Box: Lower San Francisco River		Low; 700ac (40 additional in RNCA)	
Middle Gila River		Moderate; 390 (2290 additional in WLDR)	
Paria River	Low/High; WLDR Withdraw		
Sante Marie River	Low/Moderate; 1040 ac		
Virgin River	Low; WLDR Withdraw		

As Table 4-ASMN2 indicates, seven segments (10,997 acres) outside of wilderness and riparlan national conservation areas would be designated Wild and withdrawn from mineral entry and leasing under the Wild and Scenic Rivers Act. These seven segments are in the Agua Fria River (5,320 acres), Burro Creek (3,347 acres), Hassayampa River (200 acres) Lower San Francisco River (700 acres), Middle Gila River (390 acres) and Santa Maria River (1,040 acres) study areas.

In the Table, acreage is shown for segments that would be withdrawn under the Wild and

Scenic Rivers Act; acres are not included for segments withdrawn under other legislation.

The 20 segments (50,237 acres) in river study areas recommended for a Scenic or Recreational designation would not be withdrawn from mineral entry under the Wild and Scenic Rivers Act. These are shown in Table 4-ASMN3. Because two segments of the Bill Williams River, and two segments in Cienega Creek have no mineral potential, they are not included in Table 4-ASMN3.

TABLE 4-ASMN3 RIVER AREA SCENIC AND RECREATIONAL LOCATABLE MINERAL POTENTIAL

					T
River Study Area	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5
Agua Fria River	L; 1390ac; Scenic				
Big Sandy River	L-M; 2030ac; Scenic; ACEC				
Bonita Creek	L; 3570ac; Recreation; RNCA				
Вигто Стеек		" -	H; 630ac; Recreation		M; 1130ac; Scanic; ACEC
Francis Creek	L; 1360ac; Recreation; ACEC		!		
Gila Box: Gila River	L; 1940ac; Scanic; RNCA		N-L; 1270ac; Scenic; RNCA		
Hassayampa River	M-H; 250ac; Recreation		M-H; 2890ac; Recreation	1	
Gila Box; Lower San Francisco River	L; 1134; Recreation				
Middle Gila River	M; 560ac; Recreation		M; 1760ac; Recreation		, <u>.</u>
San Pedro River	L/M; 12256ac; Recreation; RNCA	***			
Santa Maria River	L/M; 5310ac; Scenic; ACEC	111			
Turkey Creek	L: 370ac: Recreation; WLDR: 560ac Recreation; ACEC				
Virgin River		L; 2336ac; Scenic; WLDR	L; 2368ac; Recreation; WLDR	L; 3712ac; Recreation; ACEC	
Wright Creek Creek	L; 3861ac; Scenic; ACEC				

As Table 4-ASMN3 illustrates, seven of the 20 segments are under wilderness area or riparian national conservation area withdrawals. Of the 13 remaining segments, all or portions of six (segment 1 in the Big Sandy River, segment 2 in the Bill Williams River, segment 5 in the Burro Creek, segment 1 in the Francis Creek, segment 1 in the Santa Maria River, and segment 4 of the Virgin River study areas) are in areas of critical environmental concern. All or portions of seven segments are not under special protection. They are in the Agua Fria River,

Burro Creek, Hassayampa River (two segments), Lower San Francisco River, and Middle Gila River (two segments) study areas.

Adverse impacts on minerals development may be caused by other changes. For example, minerals development activities on moderate-to-high potential areas adjacent to withdrawal areas may not occur or may be curtailed if the ore deposit is too small for a reasonable operation. Prohibiting roads in Wild segments may hinder access to areas outside the wild

Conclusion

There are 34 segments where locatable mineral potential estimates have been made. All or portions of seven segments (10,997 acres) not currently under legislative protection would be recommended for a Wild designation. Two segments (2,830 acres) have a moderate to high mineral potential. Two others (5,710), have a moderate locatable mineral potential. One has a low to moderate potential (1,040 acres). Two, encompassing 1,417 acres, have a low potential.

Mineral entry would be available on six segments outside of areas of critical environmental concern. These include segments in the Agua Fria River, Burro Creek (two segments), Hassayampa River (two segments), Lower San Francisco River, Middle Gila River (two segments) and Santa Maria River study areas.

The withdrawal of 10,997 acres from mineral entry under the implementation of the all suitable alternative would have an adverse impact on minerals development.

Impacts on Tourism

The all suitable alternative determines suitability and recommends designation of rivers in eleven counties (Cochise, Coconino, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Pima, Pinal, and Yavapai).

The travel and tourism data for these counties (Chapter 3, Table 3-14), shows a wide range of visitor totals. For Graham County the total eight-year visitor average was 46,100. In contrast, Coconino County totals were approximately 7.5 million. Greenlee County was omitted because it has no national or state parks or recreational areas.

Visitor changes for the rivers recommended as sultable for designation in these counties are shown in Table 4-AST1.

The estimations in Table 4-AST1 regarding increases in visitor use involve several assumptions. One of these is the normal trend of visitor use growth. Regardless of designation, the number of visitors to the river study areas is expected to increase in proportion to anticipated increases in tourism throughout the state. For example, the San Pedro River Riparlan National Conservation Area currently records over 50,000 annual visitor use days. Visitor use will increase in the future regardless of Congressional action on designation. The publicity associated with wild and scenic river designation would add slightly to the normal increase.

Another assumption is that wild and scenic river designation will be accompanied by publicity. Maps will Identify the rivers; brochures may be developed; commercial tour ventures may develop. The Bureau of Land Management sponsored a University of Arizona study on nature-based tourism in southeastern Arlzona. The study illustrates how nature-based tourism can benefit local economies (University of Arizona, 1992). The wild and scenic river publicity would have its greatest effect on river study areas in and near the tourism centers of the Phoenix (Maricopa County) and Tucson (Pima County) metropolitan areas. Other centers would be the cities of Sedona (Yavapai/Coconino County), Sierra Vista (Cochise County), Prescott (Yavapai County), Payson (Gila County), and Lake Havasu City, and Bullhead City (Mohave County).

A third assumption is that the Bureau of Land Management will not undertake recreational facility developments because of wild and scenic river designation. Rivers designated as Wild prohibit this. While recreational developments are allowed in Scenic and Recreational rivers, the Bureau of Land Management does not plan to develop special facilities.

TABLE 4-AST1 VISITOR USE CHANGES

COUNTY	RIVER STUDY AREA	CURRENT USE	ESTIMATED VISITOR
Cochise	San Pedro	>50,000	>10 percent
Coconino	Paria	5,300	
Gita	Middle Gils	1,500	< 20 percent
Graham	Aravaipa Creek Bonita Creek Gila Box: Gila River Swamp Springs Turkey Creek	>15,000 16,000 4,000 <100 1,200	< 20 percent < 20 percent < 20 percent > 20 percent > 10 percent
Greenlee	Gila Box: Gila Rivar Gila Box: Lower San Francisco River	4,000 >1,000	<20 percent
La Paz	Bill Williame Rivor Santa Maria Rivor	<2,500 <2,000	<10 percent <10 percent
Maricopa	Hassayampa River	1,200	> 20 percent
Mohave	Big Sandy River Bill Williams River Burro Creek Santa Meria River Virgin River Wright Creek Francis Creek	2,500 <2,500 >20,000 <2,000 7,600 <500 <1,000	<10 percent <10 percent >10 percent <10 percent <10 percent >10 percent >10 percent <10 percent
Pima	Cienega Creek	> 2,500	< 20 percent
Final	Aravaipa Creek Middle Gila	>15,000 1,500	 < 20 percent
Yavapai	Burro Creek Senta Maria River Hassayampa River Francis Craek	> 20,000 > 2,000 1,200 < 1,000	> 10 percent < 10 percent > 20 percent < 10 percent

Finally, most of the river segments recommended as suitable for designation are in primitive use areas with limited access. Exceptions to this are the San Pedro River and portions of the Virgin, Gila, and San Francisco river study areas.

As Table 4-AST1 indicates, the estimated increase in visitors ranges from 5,000 in the San Pedro River study area to fewer than 500 in the more remote study areas. On a county basis Graham County would have an additional annual total of over 4,000 visitors, or close to 10 percent of the average total park and recreational visits shown in Table 3-14. This

would be a minor beneficial impact. In Greenlee County, which does not appear in the data displayed in Table 3-14, the estimated increase would be approximately 1,000 visitor use days. This also would be a minor beneficial impact.

In the other county areas where visitor totals are already high, visitor increase proportions resulting from wild and scenic river designation would be negligible.

Conclusion

implementation of the all suitable alternative would have no adverse effects on travel and tourism. Minor beneficial impacts would occur in Graham and Greenlee Counties.

IMPACTS FROM IMPLEMENTING THE LEGISLATIVE PROTECTION ALTERNATIVE

The legislative protection alternative determines as sultable and recommends for designation into the National Wild and Scenic Rivers System all or parts of 15 eligible rivers (30 segments) covering 42,547 acres. Five river study areas (Aravaipa, Bonita Creek,

Cienega Creek, Paria River, and San Pedro River), including 11 river segments, are determined to be nonsultable and would not be recommended for designation.

There are two types of management actions in this alternative. Wild and scenic river management actions implement recommended wild and scenic river designations. The other type is the ongoing management actions described in Chapter 2. These ongoing management actions are associated with areas of critical environmental concern and Resource Management Plans. The ongoing management actions would supplement the protection provided by wild and scenic river designations.

Outstandingly Remarkable Values

Under the legislative protection alternative the outstandingly remarkable values in the river segments determined suitable and recommended for designation would receive the protection of special legislation.

Under the legislative protection alternative the five study areas determined to be nonsuitable would not receive long-term legislative protection under the Wild and Scenic Rivers Act. The outstandingly remarkable values in the nonsuitable segments are either in wilderness

areas or riparian national conservation areas and are under legislative protection.

Impacts on outstandingly remarkable scenic values

Outstandingly remarkable scenic values were identified in 14 of the 20 eligible river study areas.

Portions of 12 of these study areas would be determined suitable and recommended for designation under the legislative protection alternative. The 12 study area portions (26 segments) cover 33,886 acres. Six river study areas would have seven segments classified as Wild (Agua Fria River, Burro Creek (two segments), Hassayampa River, Lower San Francisco River, Middle Gila River, and Santa Marla River). These cover 10,830 acres. The remaining 18 segments (23,056 acres) would be recommended for designation with Scenic or Recreational classifications.

The legislative protection alternative determines approximately 53,480 acres with outstandingly remarkable scenic values to be nonsultable. These include all of a study area (for example, the Paria, and San Pedro) and portions of other study areas that are under the legislative protection of wildemess or national conservation areas.

The outstandingly remarkable scenic values include canyons, mountain slopes, rolling hills, and broad river channels. Many of the areas offer exceptional opportunities for sightseeing and photography. Riparian forests and heavy stands of vegetation offer sharp contrasts in areas where the surrounding vegetation is dominated by desert shrubs.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 10,830 acres on seven Wild segments in six river study areas (Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, Santa Maria River). This prohibition

would eliminate any threat to the outstandingly remarkable scenic values from new mining operations and the associated excavations, noise, and vehicle travel.

Patents would be restricted to the mineral estate on 31,577 acres. Ten river study areas with mineral potential are included in this management action. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances.

New roads would be prohibited on 10,830 acres in segments recommended as Wild in six river study areas (Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, and Santa Maria River). Motorized use also would be restricted in these six study areas. Prohibiting new roads and restricting motorized use would protect the outstandingly remarkable scenic values from any conflicts with vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreation, scientific, minerals development, or other activities.

In six river area wild segments (10,830 acres) new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable scenic values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the 12 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable

scenic values.

Under the legislative protection alternative dams, levees, and other types of diversions would be prohibited on approximately 90 riparian miles. This action would protect the outstandingly remarkable scenic values along 12 rivers by maintaining natural landscapes and stream flows.

The outstandingly remarkable scenic values also would be protected by the ongoing management actions described in Chapter 2.

Ten river study areas (30,228 acres; 14 segments) are recommended as nonsultable. All the segments in these 10 study areas are in either wilderness areas or riparian national conservation areas and are under legislative protection.

Conclusion

Implementation of the legislative protection alternative would have no adverse impacts on outstandingly remarkable scenic values on 33,886 acres on 26 segments of 12 river study areas. A beneficial impact would result from long-term legislative protection of these values under the Wild and Scenic Rivers Act.

The outstandingly remarkable scenic values in the approximately 53,480 acres with outstandingly remarkable scenic values recommended as nonsuitable would not have long-term legislative protection from the Wild and Scenic Rivers Act. However, the provisions of the wilderness area and riparlan national conservation management plans would provide legislative protection for scenic values.

Impacts on outstandingly remarkable recreational values

Nine of the 20 eligible river study areas (21 segments) have outstandingly remarkable recreational values.

CHAPTER 4

RIVER STUDY	AGUA	BIG	BILL	BURRO	FRANCI	GILA	HASSA-	ISAN	MID	SANTA	TURKEY	VIR-	BLM
AREAS	FRIA	SANDY	WLMS	CREEK	CREEK	BOX	YAMPA	FRAN- CISCO	GILA	MARIA	CREEK	GIN	(LAND
BLM Public Land Acres	6710	2030	486	6230	880	1410	2860	1834	3650	2810	730	4256	338
Wild Segments	5320	0	0	3340	0	0	200	700	230	1040	0	0	108
No Road in Wild Segs	5320	0	0	3340	0	0	'200	700	230	1040	0	0	108
No New Mineral Entry	5320	0	0	3340	0	0	200	700	230	1040	0	0	108
No Surface Patent	6710	1637	0	6230	880	1410	2860	1134	3650	2810	0	4256	315
Motorized Use Restricted	5320	0	486	3340	0	0	200	700	230	1040	0	0	113
No Dams or Diversions	6710	2030	486	6230	880	1410	2860	1834	3650	2810	73 0	4256	338
Acres covered in outstanding	ly remark	able porti	on by ma	anagemen	t actions	оошшо	n to all s	dternativ	/CS				
ACEC	2160	1009	486	4933	480	0	0	0	0	610	560	4256	144
Miles Closed	1	0	0	0	0	0	0	0	0	0	0	0	
Existing Roads	1390	628	0	1760	400	0	2600	1334	3500	690	730	0	130
Designated Rds	0	1009	486	1130	480	1410	0	0	0	0	0	4256	87
No Surface Occupancy	1390	1009	486	1130	480	0	2660	1134	3500	2810	730	4256	195
Protection of Nests	0	1009	486	4933	480	0	0	0	0	1060	0	0	79
Eroaion Control	0	0	0	0	0	0	0	0	0	0	0	0	
Cottonwood Planting	670	0	100	0	0	0	660	0	3650	0	0	0	50
No Woodcutting	0	0	0	0	0	0	0	0	0	0	560	9344	99
Dead/Down Wood Only	0	0	0	0	0	0	0	0	0	0	0	4256	42
No Native Plant Removal	0	1009	486	1130	480	0	0	0	0	0	0	0	31
Salt Coder Removal	0	420	510	0	0	0	0	0	610	0	_		15
Fencing	0	0	5	0	0	0	0	6	0	0	0	•	
Unique Waters Monitoring	0	0	. 0	7	4	0	0	6	0	0	0		
New Water Sources	0	5	0	5	5	5		0	0	_	_	_	
Camp Outside Riparian	0	1009	486	4933	480	0	0	0	0	610		_	75
Helicopter Restrictions	0	1009	486	4933	480	0	0	0	0	1060	0	0	79
Total scres (BLM/Privats/Ot	her) cover	ed by out	standing	ly remark	able por	tion		-					
Total	7160	5810	1713	12420	880	1410	5936	2424	6035	7730	730	5952	582
Private	180	3780	524	3350	0	0	600	590	1505	2430	0	1632	145
State/Other	270	0	703	2840	0	0	2476	0	880	2490	0	64	97
RMP Planned Acquisition	120	4510	800	6042	400	0	1040	590	2205	610	0	1596	179

The outstandingly remarkable recreational values support hiking, backpacking, camping, horseback riding, sightseeing, wildlife observation, hunting, off highway vehicle use, fishing, photography, rock climbing, swimming, rafting, kayaking, canoeing, and geologic, ecologic, off highway vehicle use, and cultural resource observation and interpretation. Visitor use figures range from annual uses that are very low (Wright Creek) to the very popular Aravaipa Creek, Burro Creek, and San Pedro River areas.

The legislative protection alternative recommends designation for 13 segments in portions of six of the nine eligible river study areas. The segments cover 14,946 acres. Three segments (4,040 acres) in two river study areas are recommended suitable as Wild (Burro Creek (2 segments) and Lower San Francisco River). The remaining ten segments (10,906 acres) are recommended suitable as Scenic or Recreational.

Portions of eight study rivers (43,713 acres) with outstandingly remarkable recreational values are recommended as nonsuitable. These are either in wilderness areas or riparian national conservation areas and include Aravaipa Creek, Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Paria, San Pedro River, and the Virgin River study areas.

The rivers are either the basis of recreational activities (floating, swimming, fishing) or contribute to the quality and intensity of an activity. Riparian areas provide excellent hiking and camping opportunities as well as wildlife habitat for wildlife observations and hunting. Table 3-6 in Chapter 3 summarizes the primary types of recreation associated with each river study area. In addition, archaeological and historic resources in many of the river study areas attract visitors. Dramatic canyons such as the Paria, Burro Creek, and the Gila River: Gila Box provide

uncommon opportunities for photographic and artistic projects.

Visitor use figures are varied and, as Table 3-6 indicates, range from annual totals that are very low (Wright Creek) to the very popular Aravaipa Creek, Burro Creek, and San Pedro River areas.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 4,040 acres on two river study areas (Burro Creek, Lower San Francisco River) with Wild segments. This prohibition would eliminate any threat to the outstandingly remarkable recreational values from new mining operations and the associated noise, traffic and restrictive land uses.

Patents would be restricted to the mineral estate on 13,516 acres within the Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, and Virgin river study areas. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances.

New roads would be prohibited on 4,040 acres in Wild segments in two river study areas (Burro Creek, Lower San Francisco River). Motorized use also would be restricted in these two study areas. Prohibiting new roads and restricting motorized use would protect the outstandingly remarkable recreational values by vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreation, scientific, minerals development, or other activities.

TABLE 4-LP2: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE RECREATIONAL VALUES

RIVER STUDY	BILL	BURRO	GILA	L.SAN	TURKEY	VIR-	BLM
AREAS	WLMS	CREEK	BOX	FRAN-	CREEK	GIN	PUBLIC
				CISCO			LAND
BLM Public Land Acres	486	6230	1410	1834	730	4256	14946
Wild Segments	0	3340	0	700	0	0	4040
No Road in Wild Segs	0	3340	0	700	0	0	4040
No New Mineral Entry	0	3340	0	700	0	0	4040
No Surface Patent	486	6230	1410	1134	0	4256	13516
Motorized Use Restricted	0	3340	0	700	0	0	4040
No Dams or Diversions	486	6230	1410	1834	730	4256	14946
Acres covered in outstandingly	remarkable :	portion by	/ manage	ment			
actions common to all alternati	ves						
ACEC	486	4933	0	0	560	4256	10235
Miles Closed	0	0	0	0	0	0	0
Existing Roads	0	1760	0	1334	730	0	3824
Designated Rds	486	1130	1410	0	0	4256	7282
No Surface Occupancy	486	1130	0	1134	730	4256	7736
Protection of Aeries	486	4933	0	0	0	0	5419
Erosion Control	0	0	0	0	0	0	0
Cottonwood Planting	100	0	0	0	0	. 0	100
No Woodcutting	0	0	0	0	560	9344	9904
Dead/Down Wood Only	0	0	0	0	0	4256	4256
No Native Plant Removal	486	1130	0	0	0	0	1616
Salt Cedar Removal	510	0	0	0	0	0	510
Fencing	5	0	0	6	0	0	11
Unique Waters Monitoring	0	7	0	6	0	0	13
New Water Sources	0	5	5	0	0	0	10
Çamp Outside Riparian	486	4933	0	0	0	0	5419
Helicopter Restrictions	486	4933	0			0	5419
Total acres (BLM/Private/Othe	or) covered b	y outstand	lingly ren	narkable p	ortion		
Total	1713	12420	1410	2424	730	5952	24649
Privale	524	3350	0	590	0	1632	6096
State/Other	703	2840	0	0	0	64	3607
RMP Planned Acquisition	800	6042	0	590	0	1596	9028

In two river study areas with Wild segments (4,040 acres) new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable recreational values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the six study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable recreational values.

Under the legislative protection alternative dams, levees, and other types of diversions would be prohibited on 35 riparian miles. This action would protect the outstandingly remarkable recreational values along 12 rivers by maintaining natural landscapes and stream flows.

Outstandingly remarkable recreational values also would receive protection from the ongoing management actions described in Chapter 2.

The legislative protection alternative recommends nondesignation for portions of eight river study areas (43,838 acres) in wilderness areas or riparian national conservation areas. This includes all or portions of the Aravaipa Creek, Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Paria, San Pedro River, and Virgin River study areas,

While the outstandingly remarkable recreational values would not receive long-

term legislative protection under the Wild and Scenic Rivers Act, there would be legislative protection from either wilderness area or riparian national conservation area management.

Conclusion

There would be no adverse impacts on the outstandingly remarkable recreational values from implementation of the legislative protection alternative. The long-term legislative protection would be beneficial.

The portions of eight study rivers (43,713 acres) with outstandingly remarkable recreational values not determined suitable would not have the outstandingly remarkable recreational values under protection by provisions in the Wild and Scenic Rivers Act. These include Aravaipa Creek, Bill Williams River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, Paria, San Pedro River, and the Virgin River study areas. However, the outstandingly remarkable recreational values would be under the legislative protection of wilderness and national conservation areas.

Impacts on outstandingly remarkable geologic values

Outstandingly remarkable geologic values are found in three of the 20 river study areas. The legislative protection alternative recommends portions of two of these study areas for designation. Seven hundred acres are recommended as suitable for designation as Wild.

The remaining segments (15,050 acres) with outstandingly remarkable geologic values are recommended as nonsultable. These are in riparian national conservation areas (6,090 acres) and a wilderness area (8,960 acres).

TABLE 4-LP3: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE GEOLOGIC VALUES

		<u> </u>	C VAI
RIVER STUDY	GILA	L.SAN	BLM
AREAS	BOX	FRAN-	PUBLIC
		CISCO	LAND
BLM Public Land Acres	1410	1834	3244
Wild Segments	0	700	700
			0
No Road in Wild Segs	0	700	700
			0
No New Mineral Entry	0	700	700
			0
No Surface Patent	1410	1134	2544
			0
Motorized Use Restricted	0	700	700
			0
No Dams or Diversions	1410	1834	3244
Acres covered in outstanding		-	-
management actions commo			
ACEC	0	0	0
Miles Closed	0	0	0
Existing Roads	0	1334	1334
Designated Rds	1410	0	1410
No Surface Occupancy	0	1134	1134
Protection of Nests	0	0	0
Erosion Control	0	0	0
Cottonwood Planting	0	0	0
No Woodcutting	0	0	0
Dead/Down Wood Only	0	0	0
No Native Plant Removal	0	0	0
Salt Cedar Removal	0	0	0
Fencing	0	6	6
Unique Waters Monitoring	0	6	6
New Water Sources	5	0	5
Camp Outside Riparian	0	0	0
Helicopter Restrictions	0	0	0
Total acres (BLM/Private/O		ered by	
ouistandingly remarkable po —		_	_
Total	1410	2424	3834
Private	0	590	590
State/Other RMP Planned Acquisition	0	0 590	0 590

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 700 acres in the Wild segments of the Lower San Francisco River study area. Patents would be limited to the mineral estate on 2,544 acres in the Gila River: Gila Box and Lower San Francisco river study areas. Prohibiting mineral entry, and restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities, where permitted, could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances.

New roads would be prohibited on 700 acres in the Wild segment of the Lower San Francisco River. Motorized travel also would be restricted.

Under the legislative protection alternative dams, levees, and other types of diversions would be prohibited on approximately 10 riparian miles. This action would protect outstandingly remarkable geologic values on the two segments and riparian miles along two rivers by maintaining natural landscapes and stream flows.

Conclusion

There would be no adverse impacts on the outstandingly remarkable geologic values from the implementation of the legislative protection alternative.

Impacts on outstandingly remarkable geologic values in the segments (15,050 acres) recommended as nonsuitable would be negligible due to the protection offered by the wilderness area and riparian national conservation area management.

Impacts on outstandingly remarkable fish and wildlife habitat and aquatic habitat values

Outstandingly remarkable flsh and wildlife habitat was identified in 19 of the 20 eligible river study areas. Aquatic habitat was identified as an outstandingly remarkable value in the Bonita Creek and the Virgin river study areas.

The legislative protection alternative recommends all or portions of 14 study areas as suitable for designation (28 segments, 41,817 acres). Portions of seven study areas with eight segments (12,430 acres) are recommended suitable as Wild. The seven study areas include the Agua Fria River, Burro Creek (2 segments), Hassayampa River, Hot Springs, Lower San Francisco River, Middle Gila River, and Santa María River. The remaining 21 segments (29,387 acres) are recommended suitable as either Scenic or Recreational.

The legislative protection alternative determines all or portions of 12 segments (60,510 acres) including five study areas (Aravaipa Creek, Bonita Creek, Paria, San Pedro River, and Swamp Springs) to be nonsuitable. The acreage in the nonsuitable portions is either under wilderness or national conservation area legislative protection and there would be little likelihood of adverse impacts on the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Tables 3-7 and 3-8 in Chapter 3 provide details on fish and wildlife populations and riparian vegetation by river Area for each of the 20 river study areas.

TABLE 4-LP4: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE FISH AND WILDLIFE
HABITAT AND AQUATIC HABITAT VALUES

RIVER STUDY	AOUA	BIG	BILL	BURRO	CIE-	FRANCI	GEA	HASSA-	HOT	L.SAN	MID	SANTA	VIR-	WRIGHT	BLM
AREAS	FRIA	SANDY	WLM3	CREEK	NEGA	CREEK	BOX	YAMPA	SPRING	FRAN-	GILA	MARIA	GIN	CREEK	PUBLIC
										CISCO					LAND
BLM Public Land Acres	6710	2030	486	6230	3200	880	1410	2860	1600	1834	3650	2610	4256	3661	41817
Wild Segments	5320	0	0	3340	0	0	0	200	1600	700	230	1040	0	0	12430
No Road in Wild Segs	5320	0	0	3340	0	0	0	200	1600	700	230	1040	0	0	12430
No New Mineral Entry	5320	0	0	3340	0	0	0	200	1600	700	230	1040	0	0	12430
No Surface Patent	67 10	1637	486	623 0	3200	880	1410	2860	1600	1134	3650	2810	4256	3861	40724
Motorized Use Restricted	5320	0	0	3340	0	0	0	200	1600	700	230	1040	0	0	12430
No Dame or Diversions	6710	2030	486	6230	3200	880	1410		1600	1834	3650	2810	4256	3861	41817
Acres covered in outstanding	jiy ramu	rkable por	DOD by 1	nanagem	ent acuo	na comn	ion to al	Latiernai	IVes						
ACEC	2160	1009	486	4933	0	480	0	0	1600	0	0	610	4256	3861	1939
Miles Closed	1	0	0	0	5	0	0	0	0	0	_	0	0	0	
Existing Roads	1390	628	0	1760	3200	400	0	2600	0	1334	3500	690	0	3861	1936
Designated Rds	0	1009	486	1130	0	480	1410	0	0	0	_	_	4256	0	877
No Surface Occupancy	1390	1009	486	1130	3200	480	0	2660	1600	1134	3500	2810	4256		2751
Protection of Nests	0	1009	486	4933	0	480	0	0	0	0	0	1060	0	0	796
Erosion Control	0	0	0	0	1	0	0	0	0	0	_	0	0	0	
Cottonwood Planting	670	0	100	0	0	0	0	660	0	0		0	0	•	5080 1414
No Woodcutting	0	0	0	0	3200	0	0		1600	0	-	0	9344 4256	0	7450
Dead/Down Wood Only	0	0 1009	0 486	0 1130	3200 0	0 480	0	0	0	0		0	4436	3861	696
No Native Plant Removal	0	420	510	1130	0	460	0	0	0	0		0	0	3601	1544
Salt Cedar Removal	0	420 0	510	0	0	0	0	_	0	6		_	0	7	1344
Feneing Unique Waters Monitoring	0	0	0	7	0	-	0	-	5	6		_	0	7	2:
New Water Sources	0	5	0	5	0	_	5	5	0	0	_	-	0		3
Camp Outside Riparian	0	1009	486	4933	0	-	0	_	0	0	_	_	_	_	751
Holicopter Restrictions	0	1009	486	4933	0		0		0	0	_		0	_	796
Total acres (BLM/Private/O	ther) cov	ered by o	uterandi	ngly roma	rkable p	ontion			-						
Total	7160	5810	1713	12420	3360	880	1410	5936	1920	2424	6035	7730	5952	4032	6678
Private	180	3780	524	3350	0	0	0	600	160	590	1505	2430	1632	171	1492
State/Other	270	0	524	2840	160	0	0	2476	160	O	880	2490	64	0	986
RMP Planned Acquisition	120	4510	703	6042	160	400	O	1040	160	590	2205	610	1596	170	1830

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 12,430 acres of the Wild segments of seven river study areas (Agua Frla River, Burro Creek (2 segments), Hassayampa River, Hot Springs Canyon, Lower San Francisco River, Middle Gila River, and Santa Maria River). This prohibition would eliminate any threat to the outstandingly remarkable fish and wildlife habitat values from new mining operations. (Although Hot Springs Canyon is estimated to have no mineral potential a Wild designation nevertheless would prohibit mineral entry.)

Patents would be restricted to the mineral estate on 40,724 acres of the 14 study areas. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, reclamation is required, and reclamation would mitigate surface disturbances.

Roads would be prohibited on 12,430 acres in segments recommended as Wild in seven river study areas (Agua Fria River, Burro Creek (2 segments), Hassayampa River, Hot Springs Canyon, Lower San Francisco River, Middle Gila River, and Santa Maria River). Motorized use also would be restricted in these study areas. Prohibiting new roads and restricting motorized use would protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values by vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreation, scientific, minerals development, or other activities.

In the Wild segments (12,430 acres) of seven study areas new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable fish and wildlife habitat and aquatic habitat values; however, the approval of new rights-of-way would require the completion of environmental

compliance documentation. This action would complement other efforts to prevent such degradation.

Where not already initiated, instream flow assessments on the 14 study areas would be conducted in order to secure instream flow protection. Flow protection strategies and actions would be developed for each river study area to protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Under the legislative protection alternative, dams, levees, and other types of diversions would be prohibited on approximately 102 riparian miles. This action would protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values on the along 14 rivers by maintaining natural landscapes and stream flows.

The ongoing management actions described in Chapter 2 would provide additional protection for the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

The legislative protection alternative recommends all river study area segments currently in wilderness area or riparlan national conservation areas as nonsultable. This includes all or portions of the Aravaipa Creek, Bonita Creek, Paria, San Pedro River, and Santa Maria river study areas, While the outstandingly remarkable fish and wildlife habitat and aquatic habitat values would not receive long-term legislative protection under the Wild and Scenic Rivers Act, there would be legislative protection from either wilderness area or riparian national conservation area management.

Conclusion

Implementation of the legislative protection alternative would have no adverse impacts on the outstandingly remarkable fish and wildlife habitat and aquatic habitat values. Placing the 28 segments under the long-term legislative

protection of the Wild and Scenic Rivers Act would be a beneficial impact.

Nonsultability determinations for all or portions of 12 segments (60,510 acres) found to have outstandingly remarkable fish and wildlife and aquatic habitat during the eligibility study would have negligible impacts. This is due to the protection these areas already have from wilderness areas and riparian national conservation areas.

Impacts on outstandingly remarkable cultural, historic, and paleontologic values

Eighteen of the 20 river study areas are known to contain prehistoric and historic archaeological sites. Nine of these study areas have outstandingly remarkable cultural resource values. Details of these nine areas, are shown in Table 3-9, Chapter 3. Prehistoric sites are present in all of the areas; six contain historic sites.

The legislative protection alternative determines six study areas with outstandingly remarkable cultural and historic values (20,775 acres) to be sultable for designation. Four segments (9,840 acres) are recommended for a Wild classification; the remaining eight (10,935 acres) are recommended as Scenic or Recreational. Outstandingly remarkable cultural resource values in six of the study areas are rare and significant but nonetheless threatened by damage from erosion and human activities such as vandalism and off-road vehicle traffic.

Under the legislative protection alternative all or portions of 12 segments (34,476 acres) including three entire river study areas (Bonita Creek, Paria, and San Pedro River) are determined to be nonsultable and would not be

recommended for designation. The nonsultable areas, however, are under wilderness or national conservation area legislative protection and there would be little likelihood of adverse impacts.

Mineral entry, leasing, and materials sales would be prohibited by withdrawal on 9,840 acres on three of the six river areas (Agua Fria River, Burro Creek, Lower San Francisco River) that would be designated as Wild. This prohibition would eliminate any threat to the outstandingly remarkable cultural, historic, and paleontologic values from new mining operations.

Patents would be restricted to the mineral estate on 19,345 acres within the Agua Fria River, Burro Creek, Gila River: Gila Box, Lower San Francisco River, and Wright Creek study areas. Restricting patents to the mineral estate would preserve the surface in federal ownership and management. Although mining activities could alter the landscape, scientific data recovery and reclamation would be required to mitigate surface disturbances.

New roads would be prohibited on 9,840 acres in segments recommended as Wild in three river study areas: Agua Fria River, Burro Creek and Lower San Francisco River. Motorized use also would be restricted. Prohibiting new roads and restricting motorized use would protect the outstandingly remarkable cultural resource values from damage or any conflicts with by vehicle use in the river study areas. In certain situations, the prohibition on new roads could limit future access to uplands areas for recreational, scientific, minerals development, or other activities.

TABLE 4-LP5: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE CULTURAL, HISTORIC, AND PALEONTOLOGIC VALUES

RIVER STUDY	AGUA	BURRO	GILA	L.SAN	TURKEY	WRIGHT	BLM
ARRAS	FRIA	CREEK	вох	FRAN-	CREEK	CREEK.	PUBLIC
				CISCO			LAND
BLM Public Land Acres	6 710	6230	1410	1834	730	3861	20775
Wild Segments	5320	3820	0	700	o	0	9840
No Road in Wild Segs	5320	3820	0	700	0	0	9840
No New Mineral Entry	5320	3820	0	700	0	0	9840
No Surface Patent	6710	6230	1410	1134	0	3861	19345
Motorized Use Restricted	5320	3820	0	700	0	0	9840
No Dams or Diversions	6710	6230	1410	1834	730	3861	20775
es covered in outstandingly remark	able portion	a by mana	gement	actions co	mmon to	्र भी भीरता	
AGEO	01/0	4033	^	^	***	200.	
ACEC	2160	4933	0	0	560	3861	11514
Miles Olesand		_	^				
Miles Closed	1	0	0	0	770	0	_
Existing Roads	1390	1760	0	1334	730	3861	9075
Existing Roads Designated Rds	1390 0	1760 1130	0 1410	1334 0	730 0	3861 0	9075 2540
Existing Roads Designated Rds No Surface Occupancy	1390 0 1390	1760 1130 1130	0 1410 0	1334 0 1134	730 0 730	3861 0 3861	9075 2540 8245
Existing Roads Designated Rds No Surface Occupancy Protection of Nests	1390 0 1390 0	1760 1130 1130 4933	0 1410 0 0	1334 0 1134 0	730 0 730 0	3861 0 3861 0	9075 2540 8245 4933
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control	1390 0 1390 0	1760 1130 1130 4933 0	0 1410 0 0	1334 0 1134 0 0	730 0 730 0	3861 0 3861 0	9075 2540 8245 4933 0
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting	1390 0 1390 0	1760 1130 1130 4933	0 1410 0 0	1334 0 1134 0	730 0 730 0 0	3861 0 3861 0	9075 2540 8245 4933 0 670
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting	1390 0 1390 0 0 670	1760 1130 1130 4933 0	0 1410 0 0 0	1334 0 1134 0 0	730 0 730 0	3861 0 3861 0 0	9075 2540 8245 4933 0 670 560
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting	1390 0 1390 0 0 670	1760 1130 1130 4933 0 0	0 1410 0 0 0 0	1334 0 1134 0 0 0	730 0 730 0 0 0 560	3861 0 3861 0 0 0	9075 2540 8245 4933 0 670 560
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only	1390 0 1390 0 0 670 0	1760 1130 1130 4933 0 0	0 1410 0 0 0 0 0	1334 0 1134 0 0 0 0	730 0 730 0 0 0 560	3861 0 3861 0 0 0	9075 2540 8245 4933 0 670 560 0
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal	1390 0 1390 0 0 670 0	1760 1130 1130 4933 0 0 0 0	0 1410 0 0 0 0 0	1334 0 1134 0 0 0 0	730 0 730 0 0 0 560 0	3861 0 3861 0 0 0 0 0 3861	9075 2540 8245 4933 0 670 560 0 4991
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal	1390 0 1390 0 0 670 0 0	1760 1130 1130 4933 0 0 0 0 1130	0 1410 0 0 0 0 0 0	1334 0 1134 0 0 0 0 0	730 0 730 0 0 0 560 0	3861 0 3861 0 0 0 0 0 3861 0	9075 2540 8245 4933 0 670 560 0 4991 0
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing	1390 0 1390 0 670 0 0	1760 1130 1130 4933 0 0 0 0 1130 0	0 1410 0 0 0 0 0 0 0	1334 0 1134 0 0 0 0 0 0	730 0 730 0 0 0 560 0	3861 0 3861 0 0 0 0 0 0 3861 0	9075 2540 8245 4933 0 670 560 0 4991 0
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Saft Cedar Removal Fencing Unique Waters Monitoring	1390 0 1390 0 0 670 0 0 0	1760 1130 1130 4933 0 0 0 1130 0 7	0 1410 0 0 0 0 0 0 0	1334 0 1134 0 0 0 0 0 0 0 0	730 0 730 0 0 0 560 0 0	3861 0 3861 0 0 0 0 0 0 3861 0 7	9075 2540 8245 4933 0 670 560 0 4991 0 13
Existing Roada Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources	1390 0 1390 0 670 0 0 0	1760 1730 1130 4933 0 0 0 0 1130 0 7	0 1410 0 0 0 0 0 0 0 0	1334 0 1134 0 0 0 0 0 0 0 6 6	730 0 730 0 0 0 560 0 0 0	3861 0 3861 0 0 0 0 0 3861 0 7	9075 2540 8245 4933 0 670 560 0 4991 0 13 20
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian	1390 0 1390 0 670 0 0 0 0	1760 1130 1130 4933 0 0 0 0 1130 0 7 5 4933	0 1410 0 0 0 0 0 0 0 0 0 5	1334 0 1134 0 0 0 0 0 0 0 6 6 6	730 0 730 0 0 0 560 0 0 0 0	3861 0 3861 0 0 0 0 0 3861 0 7 7	9075 2540 8245 4933 0 670 560 0 4991 0 13 20
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total acres (BLM/Private/Other)	1390 0 1390 0 670 0 0 0 0 0	1760 1130 1130 4933 0 0 0 0 1130 0 7 5 4933 4933 y outstance	0 1410 0 0 0 0 0 0 0 0 5 0	1334 0 1134 0 0 0 0 0 0 0 6 6 0 0 0 markable	730 0 730 0 0 560 0 0 0 0 0 0	3861 0 3861 0 0 0 0 3861 0 7 7 7	9075 2540 8245 4933 0 670 560 0 4991 0 13 20 11 4933 4933
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total	1390 0 1390 0 670 0 0 0 0 0 0 covered b	1760 1130 1130 4933 0 0 0 0 1130 0 7 5 4933 4933 y outstance	0 1410 0 0 0 0 0 0 0 5 0 0 0 0	1334 0 1134 0 0 0 0 0 0 0 6 6 0 0 0 0 0 0 0 0 0 0	730 0 730 0 0 560 0 0 0 0 0 0 portion	3861 0 3861 0 0 0 0 3861 0 7 7 1 0 0	9075 2540 8245 4933 0 670 560 0 4991 0 13 20 11 4933 4933
Existing Roads Designated Rds No Surface Occupancy Protection of Nests Erosion Control Cottonwood Planting No Woodcutting Dead/Down Wood Only No Native Plant Removal Salt Cedar Removal Fencing Unique Waters Monitoring New Water Sources Camp Outside Riparian Helicopter Restrictions Total acres (BLM/Private/Other)	1390 0 1390 0 670 0 0 0 0 0	1760 1130 1130 4933 0 0 0 0 1130 0 7 5 4933 4933 y outstance	0 1410 0 0 0 0 0 0 0 0 5 0	1334 0 1134 0 0 0 0 0 0 0 6 6 0 0 0 markable	730 0 730 0 0 560 0 0 0 0 0 0	3861 0 3861 0 0 0 0 3861 0 7 7 7	9075 2540 8245 4933 0 670 560 0 4991 0 13 20 11 4933 4933

In three river study areas (9,840 acres) recommended as suitable for designation as Wild, new rights-of-way would be discouraged. While this would not prevent new rights-of-way, it would encourage applicants to consider alternative routes. Rights-of-way could degrade outstandingly remarkable cultural resource values; however, the approval of new rights-of-way would require the completion of environmental compliance documentation. This action would complement other efforts to prevent such degradation.

In the six segments (20,775 acres) included in the legislative protection alternative for inclusion in the National Wild and Scenic Rivers System cultural resources would be inventoried; site protection strategies involving fencing, monitoring, or stabilization would be developed; research would be encouraged and selected sites would be interpreted as appropriate for public visitation.

Additional protection for the outstandingly remarkable cultural, historic, and paleontologic values would be provided by the ongoing management actions described in Chapter 2.

Proposed activities that could result in increased use or surface disturbance in six study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed.

Sites evaluated as eligible for the National Register of Historic Places, in consultation with the State Historic Preservation Officer, would be normally be avoided by the proposed activity. However, if avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer.

Conclusion

Implementation of the legislative protection alternative would have no adverse impacts on the outstandingly remarkable cultural, historic, and paleontologic values. Placing the areas under the long-term legislative protection of the Wild and Scenic Rivers Act would be a beneficial impact.

Determining all or portions of 12 segments (34,476 acres) as nonsuitable and not recommending them for designation would have a negligible impact. This is because the segments are under the legislative protection provided in wilderness areas and riparian national conservation areas.

Impacts on outstandingly remarkable hydrologic values

Two river study areas (3,244 acres) have outstandingly remarkable hydrologic values. The outstandingly remarkable hydrologic values are identified with perennial natural water flow in an otherwise semi-arid desert environment.

TABLE 4-LP6: MANAGEMENT ACTIONS: OUTSTANDINGLY REMARKABLE HYDROLOGIC VALUES

REMARKABLE H	YDRO	LOGI	C VAL	Ų
RIVER STUDY	CILA	L.SAN	BLM	
AREAS	BOX	FRAN-	PUBLIC	
		CISCO	LAND	
BLM Public Land Acres	1410	1834	3244	
Wild Segments	0	700	700	
No Road in Wild Segs	0	700	700	
No New Mineral Entry	0	700	700	
No Surface Patent	1410	1134	2544	
Motorized Use Restricted	0	700	700	
No Dams or Diversions	1410	1834	3244	
Acres covered in outstandingl	y remark.	able por	ion by	
management actions common	to all alte	ematives	;	
ACEC	0	0	0	
Miles Closed	0	0	0	
Existing Roads	0	1334	1334	
Designated Rds	1410	0	1410	
No Surface Occupancy	0	1134	1134	
Protection of Nests	0	0	0	
Erosion Control	0	0	0	
Cottonwood Planting	0	0	0	
No Woodcutting	0	0	0	
Dead/Down Wood Only	0	0	0	
No Native Plant Removal	0	0	0	
Salt Cedar Removal	0	0	0	
Fencing	0	6	6	
Unique Waters Monitoring	0	6	6	
New Water Sources	5	0	5	
Camp Outside Riparian	0	0	0	
Helicopter Restrictions	0	0	0	
Total acres (BLM/Private/Otl	her) cove	red by		
outstandingly remarkable por		•		
Total	1410	2424	3834	
Private	0	590	590	
State/Other	0	0	0	
RMP Planned Acquisition	0	590	590	

Approximately 6,100 acres with outstandingly remarkable hydrologic values would be determined to be nonsuitable under the legislative protection alternative. The acreage is under wilderness or national conservation area protection.

Currently, water rights in the area are under a complex state and federal water rights litigation process that eventually will determine stream flow quantities. The most likely scenario is that senior water rights will be located downstream, assuring continued flow in the Gila River: Gila Box.

Where not alrready initiated, instream flow assessments would be conducted in order to secure instream flow protection. Flow protection strategies would be developed for each river study area to protect the outstandingly remarkable hydrologic values.

Under the legislative protection alternative, dams, levees, and other types of diversions would be prohibited on approximately 10 riparian miles. This action would protect the outstandingly remarkable hydrologic values along two rivers by maintaining natural landscapes and stream flows.

Conclusion

Implementation of the legislative protection alternative would have no adverse impacts on outstandingly remarkable hydrologic values. The legislative protection for the outstandingly remarkable hydrologic values from the Wild and Scenic Rivers Act would complement the legislative protection associated with the riparian national conservation area status.

The approximately 6,100 acres with outstandingly remarkable hydrologic values that would be determined to be nonsultable under the legislative protection alternative would be under wilderness or national conservation area protection. Adverse impacts would be unlikely.

Impacts on Minerals Development

A locatable mineral potential exists in 34 of the 40 study area segments (98,120 acres). There is no mineral potential in six river study area segments (7,776 acres). These are the Bill Williams River (2 segments, 2,157 acres), Cienega Creek (2 segments, 3200 acres), Hot Springs Canyon (1 segment, 1600 acres), and Swamp Springs (1 segment, 640 acres).

TABLE 4-LPMN1 SEGMENTS WITH MINERAL POTENTIAL

River Study Area	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5
Agua Fria River	L; 1390ac; Scenic	M; 5320ec; Wild			
Big Sandy River	1-M; 2030ac; Scenic				
Bill Williams River	L-M; 148ec; Wild				
Burro Creek	L; 710ac; Wild		H; 630ac; Recreation	M-H; 2630ac; Wild	M; 2260ac; Scenic
Francis Creek	L; 840ac; Recreation				
Gila Box: Gila River	L; 420ac; Scenic		N-L; 990ac; Scenic		
Hassäyampa Rivor	M·H; 250ac; Recreation	M-H; 200ac; Wild	M-H; 2410ac; Recreation		
Gila Box: Lower San Francisco River	L; 1094 Recreation	L; 700; Wild			
Middle Gila River	M; 500ac; Recreation	M; 230ac; Wild	M; 1780ac; Recreation		
Santa Maria River	L/M; 1040ac; Scenic	L-M; 1770ac; Wild			
Turkey Creek	L; 730ec; Recreation				
Virgin River		L; 256ac; Scanic	L; 286ec; Recreation	L; 3712ac; Recreation	
Wright Creek Creek	L; 3861ac; Scenic				

The legislative protection alternative includes 13 river study areas with mineral potential covering a total of 37,221 acres. Six study areas with seven segments (10,830 acres) are recommended for designation with a Wild

classification; the remaining 18 segments (26,391 acres) are recommended for designation with a Scenic or Recreational classification. The river study areas and segments are shown in Table 4-LPMN1.

TABLE 4-LPMN2 RIVER AREA WILD SEGMENT MINERAL WITHDRAWALS

River Study Area	Segment 1	Segment 2	Segment 4
Agua Fria River		Moderate; 5320 acres	
Bill Williams River	Low/Moderate; 2314 acres		
Burro Creek	Low; 710 acres		Moderate/High; 2630 acres
Hassayampa River		Moderate/High; 200 acres	
Gila Box: Lower San Francisco River		Low; 700ac	
Middle Gila River		Moderate; 230 acres	
Santa Maria River	Low/Moderate; 1040 acres	,	

As Table 4-LPMN2 indicates, two segments (2,830 acres) of moderate to high mineral potential would be withdrawn. Two segments (5,550 acres) with moderate mineral potential also would be withdrawn. One segment (1,040 acres) with a low-to-moderate mineral potential would be withdrawn. Two other segments (1,410 acres) with a low mineral potential would be withdrawn.

The 18 segments (26,391 acres) with mineral potential in river study areas that are recommended for a Scenic or Recreational designation would not be withdrawn from mineral entry under the Wild and Scenic Rivers Act. Because segment two segments of the Bill Williams River, and two segments in Cienega Creek have no mineral potential they are not included in Table 4-LPMN3.

TABLE 4-LPMN3 RIVER AREA SCENIC AND RECREATIONAL LOCATABLE MINERAL POTENTIAL

River Study Area	Segment 1	Seament 2	Segment 3	Segment 4	Segment 5
HIVEF STUDY AFEB	Segment 1	Segment 2	Segment 3	Segment 4	Segment o
Agua Fria River	L; 1390ac; Scenic			·	
Big Sandy River	L-M; 2030ac; Scenic; ACEC				
Burro Creek			H; 630ac; Recreation		M; 1130ac; Scenic; ACEC; 1130ac; Scenic
Francis Creek	L; 840ac; Recreation; ACEC				
Gila Box; Gila River	L; 420ac; Scanic		N-L; 990ac; Scenic		
Hassayampa River	M-H; 250ac; Recreation		M-H; 2410ac; Recreation		
Gila Box: Lower San Francisco River	L; 1094; Recreation				
Middle Gila River	M; 500ac; Recreation		M; 1780ac; Recreation		
Santa Maria River		L/M; 1770ac; Scenic ACEC			
Turkey Creek	L; 730ac; Recreation; ACEC				
Virgin River		L; 256ac; Scenic; ACEC	L; 200ec; Recreation; ACEC	L; 3712ec; Recreation; ACEC	
Wright Creek Creek	L; 3861ac; Scenic; ACEC				

Table 4-LPMN3 shows that all or portions of nine study area segments are in areas of critical environmental concern. These segments include: Big Sandy River segment 1, Burro Creek segment 5, segment 1 in Francis Creek, Santa Maria River segment 2, segment 1 in Turkey Creek, segments 2, 3 and 4 of the Virgin and segment 1 in Wright Creek. These nine segments cover 15,287 acres.

All or portions of nine other segments (11,104 acres) are not under special protection. They are in the Agua Fria River, Burro Creek, Gila River: Gila Box, Hassayampa River, Lower San Francisco River, and Middle Gila River study areas.

Adverse impacts on minerals development may be caused by other changes. For example, minerals development activities on moderate-to-high potential areas adjacent to withdrawal areas may not occur or may be curtailed if the ore deposit is too small for a reasonable operation. Prohibiting roads in Wild segments may hinder access to areas outside the river corridor for exploration and/or minerals development.

The legislative protection alternative determines 12 segments currently under wilderness area and riparian national conservation areas to be nonsultable. This would not release any minerals entry prohibitions because acres

withdrawn under wilderness areas and riparian national conservation area legislation would not change.

Conclusion

There are 25 segments where locatable mineral potential estimates have been made. Six study areas (Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, Middle Gila River, and Santa Maria River) with seven segments totalling 10,830 acres are determined suitable and recommended for designation with a Wild classification and would be withdrawn from mineral entry.

Two segments (2,830 acres) of moderate to high mineral potential would be withdrawn. Two segments (5,550 acres) with moderate mineral potential also would be withdrawn. One segment (1,040 acres) with a low-to-moderate mineral potential would be withdrawn. Two other segments (1,410 acres) with a low mineral potential would be withdrawn.

Nine other segments (13,887 acres) recommended for either Scenic or Recreational classifications, would be under area of critical environmental concern management.

Mineral entry would be available on nine segments (10,594 acres) outside of areas of critical environmental concern. These include segments in the Agua Fria River, Burro Creek, Gila River: Gila Box, Hassayampa River, Lower San Francisco River, Middle Gila River, and Santa Maria River study areas.

The implementation of the legislative protection alternative would have a minor adverse impact on minerals development.

Impacts on Tourism

The legislative protection alternative determines suitable and recommends designation of all or portions of rivers in ten counties: Cochise, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Pima, Pinal, and Yavapai. The travel and tourism data for these counties (Chapter 3, Table 3-14), shows a wide range of visitor totals. For Graham County, the average eight-year visitor total was 46,100. In contrast, the Coconino County totals were approximately 7.5 million. Greenlee County was omitted because it has no national or state parks or recreational areas.

Visitor expectations for the rivers recommended as sultable for designation in these counties are shown in Table 4-LPT1.

The estimations in Table 4-LPT1 regarding increases in visitor use involve several assumptions. One of these is the normal trend of visitor use growth. Regardless of designation, the number of visitors to the river study areas is expected to increase in proportion to anticipated increases in tourism throughout the state. For example, the San Pedro River Riparian National Conservation Area currently records over 50,000 annual visitor use days.

Visitor use will increase in the future regardless of Congressional action on designation. The publicity associated with wild and scenic river designation would add slightly to the normal increase.

Another assumption is that wild and scenic river designation will be accompanied by publicity. Maps will identify the rivers; brochures may be developed; commercial tour ventures may develop. The Bureau of Land Management sponsored a University of Arizona study on nature-based tourism in southeastern Arizona.

The study illustrates how nature-based tourism can benefit local economies (University of Arizona, 1992). The wild and scenic river publicity would have its greatest effect on river study areas in and near the tourism centers of the Phoenix (Maricopa County) and Tucson (Pima County) metropolitan areas. Other centers would be the cities of Sedona

(Yavapal/Coconino County), Sierra Vista (Cochise County), Prescott (Yavapai County), Payson (Gila County), and in Mohave County. Lake Havasu City and Bullhead City.

A third assumption is that the Bureau of Land Management will not undertake recreational facility developments because of wild and scenic river designation. Rivers designated as Wild prohibit this. While recreational developments are allowed in Scenic and Recreational rivers, the Bureau of Land Management has no plans to develop special facilities.

Finally, most of the river segments recommended as suitable for designation are in primitive use areas with limited access. Exceptions to this are the San Pedro River and portions of the Virgin, Gila, and San Francisco river study areas.

As Table 4-LPT1 indicates, the estimated increase in visitors ranges from 5,000 in the San Pedro River study area to fewer than 500 in the more remote study areas. On a county basis Graham County would have an additional 4,000 annual visitors, or nearly 10 percent of the average total park and recreational visits shown in Table 3-14. This would be a minor beneficial impact. In Greenlee County, which does not appear in the data displayed in Table 3-14, the estimated increase would be approximately 1,000 visitor use days. This also would be a minor beneficial impact.

In the other county areas where visitor totals are already high, visitor increase proportions resulting from wild and scenic river designation would be negligible.

Conclusion

Implementation of the legislative protection alternative would have no adverse effects on travel and tourism. Minor beneficial impacts would occur in Graham and Greenlee counties.

TABLE 4-LPT1 VISITOR USE CHANGES

		<u> </u>	
COUNTY	RIVER STUDY AREA	CURRENT USE	ESTIMATED VISITOR INCREASE
Cochise	San Pedro	>50,000	<10 percent
Gila	Middle Gila	1,500	< 20 percent
Graham	Bonita Creek Gila Box: Gila River Turkey Creek	16,000 4,000 1,200	< 20 percent < 20 percent > 10 percent
Greenlee	Gila Box: Gila River Gila Box: Lower San Francisco River	4,000 >1,000	< 20 percent
La Paz	Bill Williams River Santa Maria River	< 2,600 < 2,000	<10 percent <10 percent
Магісора	Hassayampa River	1,200	> 20 percent
Mohave	Big Sandy River Bill Williams River Burro Creek Santa Marla River Virgin River	2,500 < 2,500 > 20,000 < 2,000 7,600	<10 percent <10 percent >10 percent <10 percent >10 percent
Pima	Cionega Creek	> 2,500	< 20 percent
Pinal	Aravaipa Creek Middle Gila	> 15,000 1,500	< 20 percent
Yavapai	Burro Craek Santa Maria River	> 20,000 > 2,000	>10 percent <10 percent

IMPACTS FROM IMPLEMENTING THE NO ACTION ALTERNATIVE

The no action alternative determines all 20 river study areas (103,541 acres) to be nonsuitable and has no recommendations for designation.

Under the no action alternative none of the outstandingly remarkable values would receive special legislative protection from the provisions of the Wild and Scenic Rivers Act.

Management actions discussed in this alternative include those necessary to implement existing legislative and administrative designations. These designations include wilderness areas, riparian national conservation areas, areas of critical environmental concern, and the multiple use management prescriptions in resource management plans.

Outstandingly Remarkable Values

Under the no action alternative, 40 river segments and 20 river study areas are determined to be nonsuitable. The outstandingly remarkable values would not receive special legislative protection under the Wild and Scenic Rivers Act.

The special protection currently provided to the wild and scenic river study areas during this evaluation process would be terminated if Congress selects the no action alternative.

However, the outstandingly remarkable values would be managed under the Aravaipa Wilderness Act of 1984, the Arizona Wilderness Act of 1984, and the Arizona Desert Wilderness Act of 1990. Legislative protection for areas with outstandingly remarkable values would also be provided under the San Pedro River Riparian

National Conservation Area (established by Congress in 1988) and the Gila Box Riparian National Conservation Area established by Congress in 1990.

Over 38,600 acres would be protected in wilderness areas. More than 21,900 acres would be under the protection of riparian national conservation areas. An additional 21,600 acres within the 20 river study areas would receive administrative protection from their inclusion in 10 areas of critical environmental concern.

Impacts on Outstandingly Remarkable Scenic Values

In the eligibility evaluation, 14 of the 20 river study areas were regarded to have outstandingly remarkable scenic values. All 14 rivers are recommended as nonsuitable in the no action alternative. The 14 river study areas cover 85,470 acres.

The outstandingly remarkable scenic values are varied. They include undisturbed panoramas with diverse landforms composed of canyons, mountain slopes, rolling hills, and the broad river channels. Pristine canyons and gorges provide exceptional aesthetic experiences. Rugged mountains, rocky canyons, and imposing cliff faces provide exceptional opportunities for sightseeing and photography.

Portions or all of 13 of the 14 study areas (53,600 acres) are either in wilderness areas or riparian national conservation areas.

Approximately 35,400 acres covering all or parts of 15 segments are in wilderness areas (the Paria study area, which does not have outstandingly remarkable scenic values, is not included in the total). In addition, all or parts of five other segments totalling approximately 18,300 acres are in riparian national conservation areas (Bonita Creek does not have outstandingly remarkable values and is not part of the total).

The outstandingly remarkable scenic values would be protected by ongoing management actions. For example, approved plans of operations would be required for all mineral activity above the level of casual use in areas of critical environmental concern. No surface occupancy stipulations would be required for mineral leases in 11 study areas covering 19.585 acres as identified in resource management plans and management prescriptions for areas of critical environmental concern. Mineral entry, leasing, and materials sales would be recommended for withdrawal on 11,349 acres on six river segments in accord with management provisions in areas of critical environmental concern. (This excludes 3,200 acres in the Cienega Creek study area never open to mineral entry.) These actions would protect the outstandingly remarkable scenic values by restricting and managing mineral development activities.

Up to 20,033 acres in riparian areas would be acquired on a willing seller-willing buyer basis or by exchange in accordance with management plans in riparian national conservation areas, areas of critical environmental concern and resource management plans. Nearly 42 miles of roads would be closed in four river study areas in accordance with management provisions in areas of critical environmental concern. New road development would be prohibited within 1/2 mile of a bald eagle aerie in accordance with management provisions in five areas of critical environmental concern (7,968 acres). Off-highway vehicle use would be limited to existing roads and trails on 19,163 acres of 10 Wild and study areas according to requirements in area of critical environmental concern management plans. These actions would provide protection for the outstandingly remarkable scenic values by enlarging the amount of land under federal protection and ensuring management guidance for vehicle use.

Camping would be restricted to a 14-day limit in riparian zones according to guidance in resource management plans. Camping would

be restricted to fewer than 14-days in the riparian zones of three rivers in compliance with riparian national conservation plans and wilderness management plans. Campground development will be restricted to areas outside riparian zones and the 100-year floodplain in six study areas (11,538 acres). This complies with stipulations in areas of critical environmental concern management plans. Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in five riparian areas covering 7,968 acres according to management plans in areas of critical environmental concern. Helicopter flights would be prohibited over five study areas (27,155 acres) on the basis of management requirements in areas of critical environmental concern. Requirements to locate campgrounds and picnic areas away from riparian zones would occur in five river study areas (7,968 acres) on the basis of provisions in areas of critical environmental concern management plans. Management of recreational activities would prevent overuse and protect the outstandingly remarkable scenic values.

Cottonwood and willow planting would occur on up to 2,550 acres in four Wild and study areas in compliance with area of critical environmental concern management plans. Woodcutting would be prohibited on 19,294 acres of areas of critical environmental concern. Wood collection would be restricted to down and dead materials in two study areas (7,776 acres) in accordance with area of critical environmental concern management provisions. Wood collection would be prohibited on 13,096 acres in two study areas according to provisions in resource management plans. Removal of native plants would be prohibited in 7,400 acres of five study areas in compliance with area of critical environmental concern management plans. Approximately 5,450 acres of salt cedar would be removed within five study areas according to provisions in area of critical environmental concern and resource management plans. The riparian and vegetative management actions

would protect the outstandingly remarkable scenic values by preventing and controlling conflicting activities.

Erosion control structures (stabilization, diversions) would be developed on approximately 40 riparian miles in two study areas in accordance with management provisions in riparian national conservation areas and resource management plans. Water quality monitoring would be conducted as required by the State on nearly 85 riparian miles of nine rivers designated by the State as unique waters. Approximately 28 miles of fencing that includes exclosures would be developed in riparian areas in four study areas (14,454 acres) according to management provisions for riparian national conservation areas and a resource management plan.

Proposed activities that could result in increased use or surface disturbance in 20 study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed. Sites evaluated as eligible for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer. Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism. These actions would prevent damage and deterioration to any cultural resources and protect the associated outstandingly remarkable scenic values.

Up to 37 new upland water sources would be developed for grazing management in nine study areas according to management provisions for areas of critical environmental concern. The grazing management actions would prevent damage to and any conflicts with of the outstandingly remarkable scenic values.

Conclusion

Implementation of the no action alternative would have no direct adverse impacts on outstandingly remarkable scenic values on 87,489 acres on 33 segments of 14 study areas.

Study areas with outstandingly remarkable scenic values cover 87,500 acres. Of that acreage 53,600 acres are protected under wilderness areas or riparlan national conservation area management. There would be no special legislative protection for nearly 34,000 acres.

Impacts on outstandingly remarkable recreational values

Nine of the 20 river study areas contain outstandingly remarkable recreational values. The nine rivers recommended as suitable cover about 58,784 acres in 21 separate segments (See Table 2-AS1, Chapter 2).

The river study areas provide opportunities for primitive outdoor recreation in which local and regional residents as well as tourists from around the country and world, participate. The outstandingly remarkable recreational values include hiking, backpacking camping, horseback riding, sightseeing, wildlife observation, hunting, fishing, photography, rock climbing, swimmling, rafting, kayaking, canoeing, and geologic, ecologic, and cultural resource observation and interpretation. Visitor use figures range from annual uses that are very low (Wright Creek) to the very popular Aravaipa Creek, Burro Creek, and San Pedro River areas.

Nine rivers in the eligibility evaluations were determined to have outstandingly remarkable recreational values. All are recommended for nonsultability in the no action alternative.

Under the no action alternative the outstandingly remarkable recreational values would be protected by ongoing management actions. For example, approved plans of

operations would be required for all mineral activity above the level of casual use in areas of critical environmental concern. No surface occupancy stipulations would be required for mineral leases in 13 study areas covering 33,709 acres as identified in resource management plans and management prescriptions for areas of critical environmental concern. Mineral entry, leasing, and materials sales would be recommended for withdrawal on 11,349 acres on seven river segment in accordance with management provisions in areas of critical environmental concern. (This excludes 3,200 acres in the Cienega Creek study area that has never been open to mineral entry. These actions would protect the outstandingly remarkable recreational values by restricting and managing mineral development activities.

Up to 20,033 acres in riparian areas would be acquired on a willing seller-willing buyer basis or by exchange in accordance with management plans in riparian national conservation areas. areas of critical environmental concern and resource management plans. Nearly 42 miles of roads would be closed in four river study areas in accordance with management provisions in areas of critical environmental concern. New road development would be prohibited within 1/2 mile of a bald eagle aerie in accordance with management provisions in five areas of critical environmental concern (7.968 acres). Off-highway vehicle use would be limited to existing roads and trails on 19.163 acres of 10 study areas according to requirements in area of critical environmental concern management plans. These actions would provide protection for the outstandingly remarkable recreational values by enlarging the amount of land under federal protection and ensuring management guidance for vehicle use.

Camping would be restricted to a 14-day limit in riparian zones in 17 study areas according to guidance in resource management plans.

Camping would be restricted to fewer than 14-days in the riparian zones of three rivers in

compliance with riparian national conservation plans and wilderness management plans. Camparound development will be restricted to areas outside riparian zones and the 100-year floodplain in six study areas (11,538 acres) in compliance with stipulations in areas of critical environmental concern management plans. Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in five riparian areas covering 7,968 acres according to management plans in areas of critical environmental concern. Helicopter flights would be prohibited over five study areas (27,155 acres) on the basis of management requirements in areas of critical environmental concern. Requirements to locate campgrounds and picnic areas away from riparian zones would occur in five river study areas (7,968 acres) on the basis of provisions in areas of critical environmental concern management plans. Management of recreational activities would prevent overuse and protect the outstandingly remarkable recreational values.

A number of actions would be taken in accordance with resource management plans and area of critical environmental concern management plans. For example, cottonwood and willow planting would occur on up to 2,550 acres in four study areas. Woodcutting would be prohibited on 19,294 acres, wood collection would be restricted to down and dead materials in two study areas (7,776 acres) and wood collection would be prohibited on 13,096 acres in two study areas. Removing native plants would be prohibited in 7,400 acres of five study areas. Up to 5,450 acres of salt cedar would be removed in five study areas.

Erosion control structures (stabilization, diversions) would be developed on approximately 40 riparian miles in two study areas in accordance with management provisions in riparian national conservation areas and resource management plans. Exotic fish would be removed from 70 riparian miles in four river study areas as provided by area of

critical environmental concern management plans. Water quality monitoring would be conducted as required by the Arizona on nearly 85 riparian miles of nine rivers designated by the state as unique waters. The riparian and vegetative management actions would protect the outstandingly remarkable recreational values by preventing and controlling conflicting activities. Approximately 28 miles of fencing that includes exclosures would be developed in riparian areas in four study areas (14,454 acres) according to management provisions for riparian national conservation areas and a resource management plan.

Proposed activities that could result in increased use or surface disturbance in 20 study areas would be reviewed by a cultural resource specialist. In most cases, a field inventory of the potentially affected area would be completed. Sites evaluated as eligible for the National Register of Historic Places would be avoided by the proposed activity. If avoidance is not possible, impacts would be mitigated through a data recovery program developed in consultation with the State Historic Preservation Officer. Protection measures, such as fencing or periodic monitoring, would be developed for selected cultural resources that have either a high level of significance or a history of vandalism. These actions would prevent damage and deterioration to any cultural resources and protect the associated outstandingly remarkable recreational values.

Up to 37 new upland water sources would be developed for grazing management in nine study areas according to management provisions for areas of critical environmental concern. The grazing management actions would prevent degradation of the outstandingly remarkable recreational values.

Conclusion

Implementation of the no action alternative would have no direct adverse impacts on outstandingly remarkable recreational values on

58,800 acres in 21 segments of nine study areas.

About two-thirds of the total acreage covered by the study areas has outstandingly remarkable recreational values and falls under wilderness area or riparian national conservation area protection. However, there would be no special legislative protection for nearly 14,000 acres.

Impacts on outstandingly remarkable geologic values

Outstandingly remarkable geologic values were identified in three of the 20 study areas in the Sultability reports. Two of the three river study areas (over 15,000 acres) with outstandingly remarkable geologic values are in wilderness areas or riparian national conservation areas that have long-term legislative protection. A third area with outstandingly remarkable geologic values, however, has more than 1,400 acres that have no special protection for the value. On the other hand, no surface occupancy limitations and restrictions on motorized travel to designated roads and trails help protect outstandingly remarkable geologic values.

Conclusion

There would be no direct adverse impacts on the outstandingly remarkable geologic values from the implementation of the no action alternative. However, the outstandingly remarkable geologic values would not receive long-term legislative protection from the Wild and Scenic Rivers Act.

Impacts on outstandingly remarkable fish and wildlife habitat and aquatic habitat values

Fish and wildlife habitat was identified as an outstandingly remarkable value in 19 of the 20 river study areas. Aquatic habitat was identified as an outstandingly remarkable value in two river study areas: Bonita Creek and the Virgin

River. Both are included as part of the fish and wildlife habitat category. The no action alternative recommends all or portions of these 19 study areas as nonsuitable (102,460 acres).

Under the no action alternative the outstandingly remarkable fish and wildlife habitat and aquatic habitat values would be protected by ongoing management actions. For example, approved plans of operations would be required for all mineral activity above the level of casual use in areas of critical environmental concern. No surface occupancy stipulations would be required for mineral leases in 13 study areas covering 33,709 acres as identified in resource management plans and management prescriptions for areas of critical environmental concern. Mineral entry, leasing, and materials sales would be recommended for withdrawal on 11,349 acres on seven river segment in accordance with management provisions in areas of critical environmental concern. (This excludes 3,200 acres in the Clenega Creek study area that has never been open to mineral entry. These actions would protect the outstandingly remarkable fish and wildlife and aquatic habitat values by restricting and managing mineral development activities.

Up to 20,033 acres in riparian areas would be acquired on a willing seller-willing buyer basis or by exchange in accordance with management plans in riparian national conservation areas, areas of critical environmental concern and resource management plans.

A number of actions would be taken in accordance with resource management plans and area of critical environmental concern management plans. For example, nearly 42 miles of roads would be closed in four study areas.

New road development would be prohibited within 1/2 mile of a bald eagle aerie in accordance with management provisions in five areas of critical environmental concern (7,968 acres). Off-highway vehicle use would be

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limited to existing roads and trails on 19,163 acres of 10 study areas according to requirements in area of critical environmental concern management plans. These actions would provide protection for the outstandingly remarkable fish and wildlife and aquatic habitat values by enlarging the amount of land under federal protection and ensuring management guidance for vehicle use.

Camping would be restricted to a 14-day limit in riparian zones in 17 study areas. Camping would be restricted to fewer than 14-days in the riparian zones of three rivers. Campground development will be restricted to areas outside riparian zones and the 100-year floodplain in six study areas (11,538 acres). Intensive recreational activities would be prohibited within 1/2 mile of a bald eagle nests/falcon nests during breeding season in five riparian areas covering 7,968 acres. Helicopter flights would be prohibited over five study areas (27,155 acres). Requirements to locate campgrounds and picnic areas away from riparian zones would occur in five river study areas (7,968 acres). Management of recreational activities would prevent overuse and protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Cottonwood and willow planting would occur on up to 2,550 acres in four study areas. Woodcutting would be prohibited on 19,294 acres. Wood collection would be restricted to down and dead materials in two study areas (7,776 acres). Wood collection would be

prohibited on 13,096 acres in two study areas. Removal of native plants would be prohibited in 7,400 acres of five study areas. Approximately 5,450 acres of salt cedar would be removed in five study areas.

Erosion control structures (stabilization, diversions) would be developed on approximately 40 riparian miles in two study areas. Exotic fish would be removed from 70 riparian miles in four river study areas. Water quality monitoring would be conducted as required by the state on nearly 85 riparian miles of nine rivers designated by the state as unique waters. Approximately 28 miles of fencing that includes exclosures would be developed in riparian areas in four study areas (14,454 acres).

These riparlan and vegetative management actions would protect the outstandingly remarkable fish and wildlife habitat and aquatic habitat values by preventing and controlling conflicting activities.

Up to 37 new upland water sources would be developed for grazing management in nine study areas. The grazing management actions would prevent degradation of the outstandingly remarkable fish and wildlife habitat and aquatic habitat values.

Conclusion

Implementation of the no action alternative would have no direct adverse impacts on the outstandingly remarkable fish and wildlife habitat and aquatic habitat values. However, none of the outstandingly remarkable fish and wildlife

values would be under the long-term legislative protection of the Wild and Scenic Rivers Act.

Impacts on outstandingly remarkable cultural, historic, and paleontologic values

Eighteen of the 20 study areas are known to contain prehistoric and historic archaeological sites. Nine of these are regarded as having outstandingly remarkable cultural resource values. Details of these nine areas, distributed throughout Arizona, are shown in Table 3-9, Chapter 3. Prehistoric sites are present in all of the areas; six contain historic sites. All nine study areas with outstandingly remarkable cultural and historic values (55,250 acres) are recommended by the no action alternative as nonsultable.

It is likely that all study areas contain sites of sufficient scientific potential or historic importance to be eligible for nomination to the National Register of Historic Places. Those study areas having outstandingly remarkable cultural resource values contain sites regarded as rare or exceptionally significant in terms of historic significance, scientific informational potential, or geographic location.

Sites along the San Pedro River are widely regarded as among the oldest and most important paleo-indian manifestations in North America. At the Lehner and Murray Springs sites, occupied about 9,000 B.C., bones of extinct Pleistocene mammoths were found in association with human artifacts. In addition to the bones of extinct Pleistocene animals associated with archaeological sites, the San Pedro River study area contains other significant paleontological resources, including late Cenozoic fossils one to five million years old. At the opposite end of the time spectrum, the San Pedro River study area holds the remains of Santa Cruz de Terranate, a Spanish presidio that served as an outpost in battles with the Apache. These types of sites are quite rare in Arizona.

Examples of the outstandingly remarkable cultural resources in other study areas include the Beale wagon road near Wright Creek, established in the 1850s as the first road across northern Arizona; Pueblo Duval near Bonita Creek, a rare Anasazi ruin in Mogollon country; pueblos with walls eight feet high near upper Burro Creek, representing the westernmost extension of the prehistoric Prescott culture; and pueblos at the edges of the Agua Fria River Canyon and Agua Fria River tributaries.

Outstandingly remarkable cultural resource values in nine of the study areas are rare and significant but nonetheless threatened by damage from erosion and human activities such as vandalism and off-road vehicle traffic.

Under the no action alternative the ongoing management actions would protect the values in the river study areas.

Conclusion

Implementation of the no action alternative would have no direct adverse impacts on the outstandingly remarkable cultural and historic values. However, the outstandingly remarkable cultural and historic resource values identified in the eligibility evaluation would not be placed under long-term legislative protection.

Impacts on outstandingly remarkable hydrologic values

Two study areas (9,334 acres) have outstandingly remarkable hydrologic values. Both river study areas (7,500 acres) are within the Gila Box Riparian National Conservation Area established by Congress in 1990. The outstandingly remarkable hydrologic values are identified with perennial natural water flow in an otherwise semi-arid desert environment. Ongoing management actions identified in Chapter 2 would protect the outstandingly remarkable hydrologic values.

Conclusion

Implementation of the no action alternative would have no direct adverse impacts on outstandingly remarkable hydrologic values for the 7,500 acres in the Gila Box Riparian National Conservation Area. The outstandingly remarkable hydrologic values in the remainder of the study river acreage (4,256 acres) would not receive legislative protection from the Wild and Scenic Rivers Act.

· Impacts on minerals development

A locatable mineral potential exists in 34 of the 40 study area segments (98,120 acres) identified as eligible for inclusion in the National Wild and Scenic Rivers System. There is no mineral potential in six study area segments (7,597 acres). These are the Bill Williams River (2 segments, 2,157 acres), Cienega Creek (2 segments, 3200 acres), Hot Springs Canyon (1 segment, 1600 acres), and Swamp Springs (1 segment, 640 acres).

Six segments with mineral potential and outside of wilderness areas were tentatively classed as Wild in the eligibility evaluations. The no action alternative recommends nonsultability for these segments.

An additional 20 segments (50,237 acres) in river study areas tentatively classed as Scenic or Recreational in the eligibility evaluation would be recommended as nonsuitable. Seven of these 20 segments are under wilderness area or riparian national conservation area withdrawals. Of the 13 remaining segments, all or portions of six are in areas of critical environmental concern. These are: segment 1 of the Big Sandy River, segment 5 of the Burro Creek, segment 2 of the Bill Williams River, segment 1 of the Francis Creek, segment 1 of the Santa Maria River, and segment 4 of the Virgin River study areas.

All or portions of seven segments are not under special protection. They are in the Agua Fria

River, Burro Creek, Hassayampa River, Lower San Francisco River, and Middle Gila study areas.

Conclusion

There are 34 segments where locatable mineral potential estimates have been made. Mineral entry would not be under special restrictions on seven segments outside of areas of critical environmental concern. These include segments in the Agua Fria River, Burro Creek, Hassayampa River, Lower San Francisco River, and Middle Gila study areas.

Implementation of the no action alternative would have no adverse impacts on minerals development.

Impacts on Tourism

The no action alternative recommends nondesignation for all the river study areas in 11 counties: Cochise, Coconino, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Pima, Pinal, and Yavapai.

The travel and tourism data for these counties (Chapter 3, Table 3-14), shows a wide range of visitor totals. For Graham County the total eight-year visitor average was 46,100. In contrast, the Coconino County totals were approximately 7.5 million. Greenlee County was omitted because it has no national or state parks or recreational areas.

Visitor use in the river study areas would increase in proportion to anticipated increases in tourism throughout the state. For example, the San Pedro River Riparian National Conservation Area currently records over 50,000 annual visitor use days. Current visitor levels would be maintained and trends would continue. The Bureau of Land Management sponsored a University of Arizona study on nature-based tourism in southeastern Arizona which does not include wild and scenic river data. The study illustrates how nature-based

tourism can benefit local economies (University of Arizona, 1992).

Tourism increases would be relatively high in river study areas in and near Phoenix (Maricopa County) and Tucson (Pima County) metropolitan areas. Other centers would be the cities of Sedona (Yavapai and Coconino counties), Sierra Vista (Cochise County), Prescott (Yavapai County), Payson (Gila

County), and in Mohave County, Lake Havasu City and Bullhead City. The Bureau of Land Management would continue with current plans for recreational development.

Conclusion

Implementation of the no action alternative would have no adverse effects on travel and tourism.

Bureau of Land Management, 1994

CHAPTER 5 CONSULTATION AND COORDINATION

INTRODUCTION

The Arizona Statewide Wild and Scenic Rivers Environmental Impact Statement was prepared by a Bureau of Land Management interdisciplinary team of resource specialists. Preparation of the environmental impact statement began in January, 1993. Fourteen public scoping meetings were held during March and April, 1993.

The draft legislative environmental impact statement was issued on April 8, 1994 for a 90-day public review and comment period. During the 90-day public comment period five public hearings were held.

ELIGIBILITY

Determinations of the eligibility of the 20 Wild and Scenic river study areas were made in resource management plans completed between 1991 and 1993. Two rivers were assessed in the Arizona Strip District Resource Management Plan (1991), and six were considered in the Kingman Resource Management Plan (1993). Seven river study areas containing eight separate rivers were evaluated in the Safford District Resource Management Plan (1993).

In 1993 four other rivers were evaluated in amendments to the Yuma District, Phoenix

Resource Area, and Safford District Resource Management Plans.

The determinations were based on full public involvement in compliance with the National Environmental Policy Act. The specific resource management plans are on file at the originating district and resource area offices.

SCOPING

A series of 14 scoping meetings were held in Arizona and St George, Utah during March and April 1993. The meetings were announced in the *Federal Register* (February 19, 1993; Federal Register Vol 58, No. 32, p. 9213), in paid advertisements in newspapers in Tucson, Phoenix, Yuma, Safford, and in local papers.

The list of meetings shown in Table 5-1 records only the number of people who signed the available register. It is estimated that the total number at the meetings would include an additional 50 to 60 people. Comments on issues and concerns were submitted to Bureau of Land Management personnel at the meetings either orally or in written statements. In addition to attending the formal scoping meetings the public also was encouraged to mall comments on issues or concerns to Bureau of Land Management offices. Approximately 100 written comments were received.

TABLE 5-1 SCOPING MEETINGS

TOWN	COUNTY	DATE	NUMBER SIGNED IN
Parker	La Paz	March 29, 1993	19
Bagdad	Yavapai	April 5, 1993	93
Kingman	Mohave	April 6, 1993	14
Wickenburg	Maricopa	April 7, 1993	17
Winkelman	Pinal	April 12, 1993	9
Tucson	Pima	April 13, 1993	34
Phoenix	Maricopa	April 14, 1993	54
Benson	Cochise	April 15, 1993	10
St George, Utah	Washington	April 16, 1993	21
Clifton	Greenlee	April 19, 1993	45
Safford	Graham	April 20, 1993	38
Klondyke	Graham	April 21, 1993	21
Slerra Vista	Cochise	April 22, 1993	30
Sonoita	Santa Cruz	April 23, 1993	10
TOTAL			415

OTHER AGENCY CONSULTATION AND COORDINATION

Five Interagency public informational meetings for wild and scenic river study were held in January and February. These involved the Arizona Congressional Delegation and representatives of the U.S. Forest Service, National Park Service, and the Bureau of Land Management. Meetings were held in Payson, Phoenix, Kingman, Thatcher, and Tucson.

In the course of preparing the individual resource assessment documents on which the recommended alternative is based, meetings were scheduled by district and resource area personnel with representatives of federal and state agencies that would be affected. Meetings also were held with local and county public officials.

At the state level the Bureau of Land Management has met with the Arlzona Department of Lands and the Department of Environmental Quality. Section 7 reviews have been initiated with the U.S. Fish and Wildlife Service. Other consultation and coordination efforts include meetings with the U.S. Forest Service (six meetings), the Dams and Flood Control committee of the Arizona State Legislature, the Arizona Association of Conservation Districts, and individual members of the Arizona Congressional delegation.

The Bureau of Land Management mailed three issues of a wild and scenic rivers update to approximately 1,000 people who had expressed interest in the progress of wild and scenic river studies.

In April, 1994, over 2,000 copies of the draft environmental impact statement were distributed for a 90-day public review period. During the review period the Bureau of Land Management conducted public hearings in Phoenix, Kingman, Tucson, and Safford Arizona and St. George, Utah. Copies of letters commenting on the draft, and copies of transcripts of the public hearings are contained in Chapter 5 of the Final Statewide Arizona Wild and Scenic Rivers Legislative Environmental Impact Statement.

An unresolved conflict exists regarding implementation of the alternatives recommending designation of the Virgin River. Details of this conflict are identified in chapter V of the Virgin River discussion in the River Appendix.

PREPARERS

This wild and scenic rivers environmental impact document was prepared and reviewed by two interdisciplinary groups of resource specialists. Members of the Core Group were the primary writers of the document. They are:

- D. Curtis, Planning and Environmental Coordinator, Yuma District; BS, Wildlife Biology, University of Nevada, Reno; 15 years with the Bureau of Land Management.
- T. Duck, Wildlife Biologist, Arizona Strip District, Shivwits Resource Area; 13 years with the Bureau of Land Management; BA, Ecology, University of Arizona.
- M. McQueen, Planning and Environmental Coordinator, Safford District; six years with the Bureau of Land Management; MS, Interdisciplinary Science, Western Oregon State University.

C. Stone, Archaeologist, Phoenix Resource Area, Phoenix District; seven years with the Bureau of Land Management; PhD, Anthropology, Arizona State University.

Members of the Review Group reviewed the document for consistency. They are:

- P. Buff, Associate District Manager, Minerals, Phoenix District
- J. Gaudio, Realty Specialist, Tucson Resource Area
- C. Laver, Planning and Environmental Coordinator, Phoenix District
- P. Seegmiller, Planning and Environmental Coordinator, Vermillon Resource Area
- B. Smith, Renewable Resources Advisor, Yuma District

The document was prepared under the direction of H. Kast, Deputy State Director, Division of Lands and Renewable Resources, P. Moreland, Branch Chief, Planning, Environment, Lands and Recreation, as a project of the Outdoor Recreation Program, T. O'Sullivan, Senior Technical Specialist. K. Pearson acted as project manager.

The following summary of the public scoping meeting comments and issues was printed in the draft legislative environmental impact statement and is included in this final document for the information it provides.

Since these are scoping comments gathered in April and May, 1993, they do not refer to the environmental impact document. The

responses are associated only with the comments.

These public scoping issues and comments were a primary source in developing the alternatives analyzed in the Arizona Wild and Scenic Rivers Legislative Environmental Impact Statement.

SUMMARY OF PUBLIC SCOPING MEETING COMMENTS/ISSUES

Two general types of public comments were received during the scoping period. Some pertained to issues specific to individual rivers. These are recorded and discussed for each of the 20 Wild and Scenic river study areas in the appendix (Volume 2).

The following list consolidates several hundred comments and letters from the public scoping meetings that address statewide concerns. The comments have been arranged by resource concern. The responses explain why the comments were not considered in detail in the statewide environmental impact statement.

MINERALS

 Responsible mining companies need to be encouraged to stay in business just like farming and ranching. More regulation is not the answer.

Concerns such as this are a primary reason for analyzing a range of alternatives, including No Action. The impacts of designation on various kinds of land use are addressed in each alternative.

2. What will happen to mines under designation?

There are no mines within the boundaries of the eligible river study areas. If any existed, they would continue to operate, subject to valid and existing rights and standards which protect the outstandingly remarkable values.

 I am extremely concerned about the possibility of the designation seriously crippling mining operations like the Cyprus Bagdad Copper Corporation and others.

See response 1.

4. What would the effect of Wild and Scenic River designation be on future mining activities and water withdrawals?

Federal lands within the boundaries of river areas (generally one-quarter mile from the ordinary high water mark on both sides of the river), designated and classified as Wild, are withdrawn from appropriation under the mining and mineral leasing laws (Section 9 of the Wild and Scenic Rivers Act). No new mining claims or mineral leases can be filed.

Federal lands within the boundaries of river areas, designated and classified as Scenic or Recreational, are not withdrawn from the mining and mineral leasing laws under the Act. Mining claims, subject to valid existing rights, can be paterited only as to the mineral estate and not the surface estate, subject to proof of discovery prior to the effective date of designation.

Future water rights would be junior to any asserted existing rights.

5. These proposed segments, if approved for wild and scenic river designation, would have serious negative economic impacts on existing and future mineral resources. Many of the Act's provisions which are intended to put teeth into enforcement will actually be a mechanism for abuse within the court system. There is no way to determine how such things as 'scenic' or 'conservation' easements, incompatible land uses, and condemnation of private lands will be interpreted by the courts. This Act could easily be interpreted in ways that neither the Congress nor the Bureau of Land Management intend.

Economic impacts of wild and scenic river designation on mining activity were considered but implementation of the recommended alternative or other alternatives is not expected to have substantive economic consequences.

After Congress designates river areas the Bureau of Land Management will develop management plans. Approval of these management plans will include full public participation and review in compliance with the National Environmental Policy Act.

LAND\$

6. What affect will Wild and Scenic River designations have on adjacent private lands?

Generally no affect. Designation neither gives nor implies government control of adjacent private lands. Although private lands could be included within the boundaries of the designation, management restrictions would apply only to public lands. The federal government has no power to regulate or zone private lands.

7. What affect will Wild and Scenic River designations have on other land uses like livestock grazing, mining, etc.?

See response 1.

8. What will the designation process mean for landowners who have power lines that cross rivers?

Existing powerline rights of way could continue to be used and maintained.

9. Will there be condemnation of lands, particularly state lands, that are within Wild and Scenic river study areas?

No condemnation of lands is anticipated for Bureau of Land Management river areas designated by Congress.

How does each classification (wild, scenic,

recreational) affect future development in the area?

Wild and Scenic designation seeks to maintain and enhance a river's current natural state. New dams or water projects are prohibited on the designated river segments. New mining claims are restricted, but those already established can be worked. Farms, homes and cabins along the river continue to be used just as they were before. Whether or not structures can be built within sight of the river depends on state and local regulations and easement agreements, not the Wild and Scenic Rivers Act.

Generally, the classifications reflect the level of development at time of designation, and future development levels would be compatible with such classification.

11. The Wild and Scenic designations could also be used to confiscate private land ownership along the corridors. Farmers and ranchers that have worked all their lives to make their living should not have to face the alternative of losing their source of revenue.

No condemnation of lands is anticipated for Bureau of Land Management river areas designated by Congress.

After Congress designates river areas the Bureau of Land Management will develop management plans. Approval of these management plans will include full public participation and review in compliance with the National Environmental Policy Act.

Land acquisition plans, with acquisitions pursued on a willing seller-willing buyer basis, or by exchange, have been identified in resource management plans, completed and approved in a process that involved extensive public review and comment.

12. How will designation affect rights of present

land owners to use water and shoreline?

The rights of present land owners to use water and shorelines are not affected. Any water rights gained by the Federal Government due to designation would be junior to existing water rights.

13. Why are these areas listed when they do not meet the 40 percent Bureau of Land Management ownership requirement?

The "40 percent" guidance was identified in a Bureau of Land Management Manual Section in May, 1992 as a screening tool to determine eligibility. The agency guidance has been canceled since it had no basis in law. Eligibility determinations, therefore, are not subject to a 40 percent ownership consideration. In addition, the eligibility determinations for nearly all of the Bureau of Land Management rivers in Arizona were completed prior to this guidance being issued.

14. What about private land? The Bureau of Land Management may not choose to go through condemnation, but what about a 'scenic easement?'

Scenic easement is an option available to the Bureau of Land Management. After Congress designates river areas the Bureau of Land Management will develop management with full public participation and compliance with environmental laws. Scenic easements that could affect activities on private lands would require approval by the Secretary of the Interior.

15. Concerned about property condemnations and the option of scenic easements. What protection does the land owner have?

No condemnation of lands is anticipated for Bureau of Land Management river areas designated by Congress.

After Congress designates river areas

the Bureau of Land Management will develop management plans. Approval of these management plans will include full public participation and review in compliance with the National Environmental Policy Act.

16. What happens to private land inholdings with a Wild and Scenic River designation?

Generally there would be no impact. Designation neither gives nor implies government control of adjacent private lands. Although private lands could be included within the boundaries of the designation, management restrictions would apply only to public lands. The federal government has no power to regulate or zone private lands

17. Concerns about the effects of Wild and Scenic River designation on future rights-of-way. What are the effects of designation on future needs to expand/widen existing rights-of-way?

Wild and Scenic designation seeks to maintain and enhance a river's current natural state. New dams or water projects are prohibited on the designated river segments. New mining claims are restricted, but those already established can be worked. Farms, homes and cabins along the river continue to be used just as they were before. Whether or not structures can be built within sight of the river depends on state and local regulations and easement agreements, not the Wild and Scenic Rivers Act.

Generally, the classifications reflect the level of development at time of designation, and future development levels would be compatible with such classification.

18. What about people who own property or live along the river?

Designation neither gives nor implies government control of adjacent private lands. Although private lands could be included within the boundaries of the designation, management restrictions would apply only to public lands. People living within a river corridor would be able to use their property as they had before designation.

19. What is meant by 'taking?' Is 'just compensation' based on the value of the land only (referring to condemnation), or is it based on those things off-site that are dependent on that land?

"Taking" refers to the condemnation process. Just compensation would be based on the value of land. No condemnation is planned for Bureau of Land Management river areas.

20. What happens to the private land?

Private lands within the exterior boundaries of Wild and Scenic River corridors are not considered components of the Wild and Scenic River designation. Wild and Scenic designation is not like a National Park or wilderness area which generally sets askie undeveloped natural areas. Current uses of the river and adjoining lands can continue and there is normally no need to change land ownership or use.

The basic objective of Wild and Scenic River designation is to maintain the river's existing condition. If a land use or development clearly threatens the outstandingly remarkable values which resulted in the rivers designation, efforts will be made to remove the threat through local zoning, State Scenic Waterways Act provisions, land exchanges, purchases from willing sellers and other actions short of condemnation.

21. I feel that the current land management requirements are sufficient on the public lands and no additional requirements are needed.

See response 1.

RECREATION

22. How will Wild and Scenic River [status] affect rafting (for instance on the Gila River below San Carlos Dam)?

Generally there would be no affect, except to prevent future impoundments with the Wild and Scenic River Corridor.

23. I recommend that none of the proposed rivers be included in the Wild and Scenic River program. As an avid outdoor recreationist, I believe that enough land already has 'protected status.' I enjoy RESPONSIBLE outdoor motorized recreation (e.g.: tread lightly) and I would like to continue for many years.

See response 1.

24. As an off-road motorcyclist I'm against more laws which limit travel through large tracts of land simply because I don't choose to do it on foot or on a horse.

See response 1.

25. Concern over Off-Highway Vehicle use In Wild and Scenic River corridors. Areas are being closed off to Off-highway Vehicle use such as motorcycles.

See response 1.

26. A number of people expressed similar concerns about recreation activities. These include concerns about the accessibility of designated rivers being denied to vehicles; riding up and down the river being prohibited; whether Wild and Scenic Rivers can be forded with vehicles; whether motorcycles/motorized vehicles be allowed; and whether roads and trails which currently run in or across the river will still be usable by motorized vehicles?

Generally, access routes within the river corridors would continue to be available for public use. However, if that type of use adversely impacted the outstandingly remarkable values identified for the river area, the route

could be closed or regulated. If such an activity had an adverse affect on the outstandingly remarkable values identified in the particular stretch, it would be likely that the use would not be allowed.

27. What needs to be considered is the amount of wilderness already in place. In some situations a 'wild' designation blocks access to a large tract of land.

The classification of a river segment is based largely on the amount of access presently in use.

28. Will the public have access to Wild and Scenic River areas for hunting and fishing?

Yes.

FISH AND WILDLIFE HABITAT

29. There is concern about the Endangered Species Act listing of the Razorback Sucker and proposed critical habitat designations.

This is a separate federal act and is applicable whether it is designated a Wild and Scenic River or not.

30. What steps are currently in place to prevent further habitat destruction until your studies on preservation are underway?

All eligible river areas are subject to protective management prescriptions to protect wild and scenic river values, free-flowing nature, and tentative classification until decisions are made on the suitability and/or designation of each river area.

RIPARIAN VEGETATION

31. What impact studies have been completed on the destruction of native flora and fauna within sensitive riparian habitat as to reasons for degradation and solutions?

In this project the Bureau of Land

Management efforts on Wild and Scenic Rivers are concentrated on determining the eligibility, classification, and suitability of 20 river areas.

Information on studies on riparian habitat is available from the appropriate Bureau of Land Management District and Resource Area offices.

32. Wild and Scenic River designation is consistent with state efforts for riparian area protection (to some degree). Also, the potential for water quality improvement can be enhanced with such designation.

Comment noted.

CULTURAL RESOURCES

33. How are cultural and historical resources within Wild and Scenic River areas determined?

Field specialists assess the cultural and historic values of river areas during the eligibility determination phase. In addition, the public has the opportunity to identify the resources during scoping and other public comment periods.

HYDROLOGY

34. The Bureau of Land Management should consider improving the flow rate of proposed rivers by berming the surrounding areas. Riparian areas are, of course, directly related to the amount of water available mainly on the surface. Increase the flow rate and the result is an increase in the total amount of riparian area. Berming requires no lowering of others' water allocations. It has also been proven to be effective in increasing flow areas.

Comment noted.

35. Property owners are concerned about flow regime -- they want a 'natural system' but they also want a regular flow.

Comment noted.

36. Property owners want to know if Wild and

Scenic River designation will adjust flow.

It is unlikely that designation would have any impact on instream flow, since any water right resulting from designation would be non-consumptive.

LIVESTOCK GRAZING

37. Are cattle drives OK in Wild and Scenic River areas?

As long as the cattle drive would not adversely impact the outstandingly remarkable values identified in that particular segment.

SOCIAL/ECONOMIC

38. How will the requirements of the Americans with Disabilities Act be incorporated into Bureau of Land Management study and management of Wild and Scenic Rivers?

Any developments associated with designated Wild and Scenic Rivers would comply with appropriate requirements in the Americans with Disability Act.

39. I recommend that we drop the designation of wild and scenic rivers which are already protected by communities that live and work in the areas.

See response 1.

40. Will the President of the United States be held accountable for the loss of jobs that wild and scenic river designation will cause?

No. However, no loss of jobs is anticipated if Congress were to designate any of the rivers discussed in the alternatives.

41. We need to see the cost in dollars for the proposed management of each river system.

Suitability assessment reports are on file in the Bureau of Land Management District and Resource Area offices.

These provide estimates of management costs for each river included in the recommended alternative recommended by the Bureau of Land Management.

42. We need to see the projected environmental cost to the river segment of taking no action, of not designating the segment as a Wild and Scenic River. We need to see what would we be getting for our money and how much will it cost?

The environmental impacts (costs) of implementing four separate alternatives are analyzed in the legislative environmental impact statement. One of the alternatives is No Action.

43. What impact is given to the economic potential of ecotourism on rural economies?

The economic impacts of implementing the various alternatives are addressed in the LEIS. Ecotourism is considered.

44. We do not need more taxpayer money wasted or duplicate regulations.

Dual designation (duplicate regulations) are not considered to be a problem because in the case of dual designation the most stringent management requirements would be applied.

45. The University of Arizona Department of Agricultural Economics recently completed a study of economic impacts of nature tourism on the San Pedro Basin. A conservative estimate of expenditures by ecotourists was \$2.7 million, translating to 56 jobs for the local economy. What impact does the economic advantages have on suitability studies on preserving habitat?

This report, sponsored by the Bureau of Land Management, is considered in the Legislative Environmental Impact Statement.

46. I would like these lands to remain open to all people for various reasons. This includes for

recreational purposes. Many of the areas are washes a majority of the year. Having grown up in Arizona I would like for it to remain open in the future for my children to enjoy its beauty. Thanks. Keep up all your good work.

Comment noted.

47. My only concern in establishing classifications to river sections is the tendency to overprotect, which leads to a denial of public use. The only way to avoid such is public involvement from the beginning and participation in the process.

The Bureau of Land Management has actively solicited public involvement throughout the Environmental Impact Statement process. This process started in developing the resource management plans and plan amendments, and continued in the statewide scoping meetings held in 1993. With the distribution of this document for public review and comment, and the associated public hearings, the public will have additional opportunities to comment. In addition, since Congress will make the final recommendation, the public is encouraged to contact the Congressional delegation with their views on designation.

48. What about the local economy that supports jobs in the area?

See response 1.

49. What would be the result if cities were required to go through all of these restrictions for everything they built -- more businesses and roads -- destroying farms, hills, open lands, and rivers.

This hypothetical situation is beyond the scope of this analysis.

50. Closing all areas and making wilderness areas out of them is wrong. Not too many people even go out into these areas. Our community needs this area and the state needs

the jobs it produces.

See response 1.

51. Consider the cost of Wild and Scenic Rivers on existing wilderness. Like what would be the cost of designating the Santa Maria River (which rarely flows year round)? Most of these rivers shouldn't be considered 'wild.' I don't see any difference it would make. They will look the same for the next 100 years. What is the cost of designating this area?

The sultability assessment available for review in the Kingman Resource Area Office estimated that during the first five years of designation, an additional \$61,000 would be spent in implementing the management actions for the Santa Maria River. The costs would occur in providing special management protection for the Santa Maria wildlife and scenic resources.

52. Does the government (us) really have the money to do this? Why?

Congress will make the decision to undertake additional responsibilities due to Wild and Scenic River designation.

DESIGNATION

53. What is the designation process? How will water rights in designated segments be affected?

Agencies are required to evaluate eligibility and sultability of federal river areas as part of the land use planning process. Existing water rights will not be affected. Future water rights will be subject to instream flow asserted or claimed by the Federal Government based on date of designation.

54. How does each classification (wild, scenic, recreational) affect water rights?

Classifications have no effect on water rights. Water rights claimed or asserted are based on the amount of water

required to protect the identified outstandingly remarkable values identified for the particular river segment.

55. Why is it necessary to designate these areas when they are already protected under various wilderness acts?

The Bureau of Land Management, as required by the Wild and Scenic Rivers Act and Bureau of Land Management policy, is responsible to evaluate potential additions to the National Wild and Scenic River System, including some river areas located in wilderness areas. The Wilderness Act and Wild and Scenic Rivers Act, though similar, have different protective provisions.

56. Will not additional levels of control restrict the use of these areas even greater?

Designation under the Wild and Scenic Rivers Act will not necessarily restrict use of the area, and will likely encourage public use of the area. Designation will mean higher levels of monitoring and management by the agency in order to protect the values identified during the evaluation process.

57. Who is responsible for the actual designation and what body will maintain control?

The United States Congress is responsible for designation. The responsibility to manage designated rivers is delegated to the appropriate federal land management agency, in this case the Bureau of Land Management.

58. What does dual designation buy the taxpayer; Why is a Wild and Scenic River designation needed when Wilderness is already a law?

Designation under the Wild and Scenic River Act will ensure that the freeflowing character of designated rivers and the outstandingly remarkable values identified during the evaluation process will receive special management attention by the Bureau of Land Management. Other designations may or may not provide for the same level of protection.

59. What is the purpose of Wild and Scenic River designation?

The intent of the Wild and Scenic Rivers Act is stated in the Act: "It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

The Act spells out Congress' intention to protect both the river and the adjacent in designated river areas.

It also states that "[e]ach component of the National Wild and Scenic Rivers System shall be administered in such manner as to protect and enhance the values which caused it to be included without limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its aesthetic, scenic, historic, archaeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area."

60. The designation as a Wild and Scenic River is part of a larger conspiracy to shut off the local public from the public lands.

See response 1.

61. What will designation do to guarantee continuous flow?

Designation will not guarantee continuous natural flow, but instream flow reservations, filed based on date of designation, would claim some unappropriated waters for wild and scenic river purposes, thereby ensuring some level of instream flow in the future.

62. What are the effects of Wild and Scenic River designation on future water rights?

This issue is addressed in the scoping comments in the individual rivers (Appendix) and referred to frequently in the Statewide volume. No substantive impacts are anticipated.

63. Does designation extend visual values beyond the boundary of a designated Wild and Scenic River?

Designation of lands only includes actions that apply to federal lands within an average of 1/4 mile of the ordinary high water mark of a designated river.

64. The designation of 'wild and scenic' would not impact the management of the land unless private property rights which currently exist were condemned. The original purpose of the Act (Wild and Scenic Rivers Act) -- to prevent significant alteration of stream flow -- is already accomplished through the system of water rights and existing environmental regulations. In other words, a proposed dam construction would require that an Environmental Impact Statement be submitted and that proven environmental impacts be 'acceptable;' This process provides an extensive system of checks and many layers of 'veto' authority.

Comments noted.

65. How do these areas meet the requirements for wild and scenic rivers when they basically are dry stream beds for a majority of the year?

All of the Bureau of Land Management

river areas recommended as suitable meet the basic criteria for eligibility. Each is "free-flowing" and has at least one outstandingly remarkable value.

66. There is too much of a presumption that everything eligible is suitable, and that everything suitable is designated. Nowhere is there discussion of nonsuitability and multiple use releases.

See response 1

67. I see no benefit from new regulations on top of existing ones in the proposed areas. The areas are well-protected now. What will be gained by Wild and Scenic River designation? Current policies and regulations are adequate to manage and protect the resources.

Dual designation (duplicate regulations) is not considered to be a problem because in the case of dual designation the most stringent management requirements would be applied.

68. My concerns include that along much of the proposed areas for Wild and Scenic Rivers there already exists mines and private property. This makes these areas unsultable for wild and scenic designation.

During the suitability assessment process, some areas were recommended as nonsultable for the very reason you stated. Also, see response 1.

69. The rivers being proposed for wild and scenic designation do not meet the definition of wild and scenic either by the Bureau of Land Management's definition or by the 1968 law passed by Congress and should therefore not be wild and scenic.

In the eligibility process, 20 rivers were determine eligible based on our interpretation of the wild and scenic river act. This document continues the sultability process, with an analysis of the impacts of implementing four alternatives including No Action.

MISCELLANEOUS

70. As an additional comment about the Wild and Scenic Rivers Act Itself, I am somewhat concerned about the vagueness of the wording: it seems that almost anything that has water in it (anytime it rains) is considered 'a river.'

The definition in the Wild and Scenic River Act is broad, and agencies must consider most waterways in the evaluation process. Through the eligibility and suitability phases, the number of rivers ultimately recommended to Congress is reduced.

 My recommendations are to scrap this study as few to none of these rivers are at risk.

The Bureau of Land Management is required to evaluate potential wild and scenic rivers in the land use planning process. Only Congress can direct federal land management agencies to do otherwise.

72. If this program is adopted is it likely that more sections will be added later?

It is unlikely that If a statewide wild and scenic river bill for Arizona is enacted by Congress that additional rivers will be added to the system. If only Bureau of Land Management rivers are included in future legislation, other federal areas may be considered by Congress in the future.

73. What measures can I, as an individual, take to register my opposition?

You may comment on this environmental impact statement and register your support of the no action alternative with the Arizona Congressional delegation.

74. What is the impact of designation on rivers that are navigable when the state owns the river bottom?

For any designated segments which are

also determined eligible, the federal state governments work jointly on matters affecting instream flow, and water-related outstandingly remarkable values.

75. Can a group like 'People For the West' put together a Wild and Scenic River proposal similar to Arizona Rivers Coalition?

Yes.

76. We need to see the advantage to the environment of the river segment because of the proposed management system.

This environmental impact statement evaluates the impacts of designation and nondesignation of river segments.

77. There's a general misunderstanding by the public over 'how a desert wash can be considered a wild and scenic river.'

If there is sufficient flow to support an outstandingly remarkable value, then rivers can be evaluated for potential wild and scenic river designation.

All of the Bureau of Land Management river areas recommended as suitable meet the basic criteria for eligibility. Each is "free-flowing" and has at least one outstandingly remarkable value.

78. Can a river be considered free flowing when the flow is dependent on releases from a dam?

Yes.

79. What is the Bureau of Land Management's obligation to water quality regarding Wild and Scenic River management?

The obligation is to develop and implement management actions that would protect and enhance water quality.

80. What are the differences in access opportunities and limitations under the three

potential classifications?

Access is generally limited to that level which existed at time of designation, with limited access in wild river areas and more access existing in recreational river areas. Specific access limitations are determined in the river management plan.

81. What are the opportunities for public review?

See response 47.

82. What are the criteria for tentative classification and eligibility?

Eligibility is based on river segments which: 1) are free-flowing, and 2) have at least one outstandingly remarkable value, as determined in resource management planning process.

83. Can intermittent flow be considered in eligibility?

Yes.

84. Wildlife is more harmed by intermittent flow than by continuous flow. Lots of small animals, including tortoises, are being drowned by intermittent releases.

Comment noted.

85. The Bureau of Land Management has not supported the need for a continuous flow.

Comment noted.

86. The Bureau of Land Management employees want to kick out the public and keep the river area to themselves.

Bureau of Land Management recommendations are based on public involvement in the land use planning process. Congress ultimately decides on designation.

87. Different classifications will receive different

kinds of opposition/acceptance from the public.

Comment noted.

88. How is the boundary determined if the flood plain is wider than 1/2-mile?

The river corridor is limited to an average of not more than 320 acres per river mile. Corridor width could exceed 1/2 mile in one area, if it were narrower in another. In some instances, the Wild and Scenic Rivers Act does not authorize sufficient width to include entire flood plains. This is a matter considered during the suitability determination.

89. How will boundaries be determined on wide stream channels? (This relates to the concern about the one-mile wide Big Sandy flood plain?

Final boundary determination is established after designation. The river corridor is limited to an average of not more than 320 acres per river mile. Corridor width could exceed 1/2 mile in one area, if it were narrower in another. In the case of the widest segments of the Big Sandy, the Wild and Scenic Rivers Act does not authorize sufficient width to include entire flood plain.

90. Who sets the process under which the land is administered? How often will the policies change and will we have any say in the land that we are very familiar with? We hunt in the area, use it for recreation, and it is our means of livelihood, and we have no say on the policy after it is designated as Wild and Scenic Rivers.

After Congress designates river areas the Bureau of Land Management will develop management plans. Approval of these management plans will include full public participation and review in compliance with the National Environmental Policy Act.

91. I am also familiar with mining, ranching, hunting, and other land uses. I strongly believe

that these uses can co-exist with nature without the government involvement expressed in Wild and Scenic River designation.

See response 1.

92. The 'Wild and Scenic River Act' was probably drafted in good faith. The nomination of dry rivers in Arizona is not what was on the mind of parties who drafted the Wild and Scenic River Act. As a 49-year resident of the State of Arizona, I don't want to pay taxes to manage dry washes as wild and scenic rivers.

Comment noted.

93. Many of these proposed rivers do not even flow all year and we're worrled about dams?

In addition to designating rivers to prevent future hydroelectric projects, Congress may designate rivers in order to recognize prominent river or to provide special management for unique values.

94. Some of these rivers already have along them: large water/gas lines, power lines, roads, mines, etc. These are no longer pristine -- beautiful, yes, but not pristine.

The Wild and Scenic Rivers Act recognizes varying levels of development along river areas. "Pristine" settings is not a requirement of the Wild and Scenic Rivers Act. River segments with such developments along their reaches are likely to be tentatively classified as "recreational" river areas.

AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THE DRAFT DOCUMENT WERE SENT

The Bureau of Land Management requested comments on the draft document from all affected parties. Listed below are some of the elected officials, agencies and tribes, and interest groups from whom comments were requested. The list also includes those to

whom copies of the final legislative environmental impact statement were sent.

ELECTED OFFICIALS

Federal

Senator Dennis DeConcini Senator John McCain Representative Jim Kolbe Representative John Kyl Representative Bob Stump Representative Ed Pastor Representative Karan English Representative Sam Coppersmith

State

Governor Fife Symington Speaker of the House President of the Senate

FEDERAL AGENCIES

Department of Agriculture
Tonto National Forest
Apache-Sitgreaves National Forest
Coronado National Forest
Prescott National Forest
Kaibab National Forest
Coconino National Forest

Department of Defense

Department of Energy

Department of Interior
Bureau of Indian Affairs
Bureau of Mines
Bureau of Reclamation
Fish and Wildlife Service
Geological Survey
National Park Service

Environmental Protection Agency

INDIAN TRIBES AND COUNCILS

- Ak-Chin community Council, Maricopa, Arlzona
- · Cocopah Tribal Council, Somerton, Arizona
- · Colorado River Indian Tribes, Parker, Arizona

- Mohave-Apache Tribal Council, Fountain Hills, Arizona
- Fort Mohave Tribal Council, Needles, California
- Gila River Indian Community, Sacaton, Arizona
- · Havasupai Tribal Council, Supai, Arizona
- · Hopi Tribal Council, Kykotsmovi, Arizona
- Arizona Yavapai Prescott Tribal Council, Prescott, Arizona
- Hualapai Tribal Council, Peach Springs, Arizona
- Kaibab-Paiute Tribal Council, Fredonia, Arizona
- · The Navajo Tribe, Window Rock, Arizona
- · Pascua-Yaqui Tribe, Tucson, Arizona
- Quechan Tribal Council, Yuma, Arizona
- Salt River Pima Maricopa Community, Scottsdale, Arizona
- San Carlos Apache Tribe, San Carlos, Arizona
- San Juan Southern Paiute Tribe, Tuba City, Arizona
- Tohono O'Odham Tribal Council, Sells, Arizona
- Tonto Apache Tribe, Payson, Arizona
- White Mountain Apache Tribe, Whiterlyer, Arizona
- · Pueblo of Zuni, Zuni, New Mexico

ARIZONA STATE AGENCIES

Arizona Department of Lands

Arizona Department of Environmental Quality

Arizona Department of Transportation Arizona Game and Fish Department

Arizona Department of Commerce

Arizona Outdoor Recreation Coordinating

Commission

Arizona State Parks Board

Arizona Water Resources Department Governor's Commission on the Arizona

Environment

Minerals Resource Department

COUNTY COMMISSIONERS

Cochise County Coconino County Gila County Graham County Greenlee County La Paz County
Maricopa County
Mohave County
Pima County
Pinal County
Yavapai County

MAYORS

Clifton
Flagstaff
Florence
Globe
Kingman
Parker
Phoenix
Prescott
Safford
Sierra Vista

St. George, Utah

Tucson

LOCAL AGENCIES

The Arizona Associations of Governments Washington County, Utah, Water Conservation District

INTEREST GROUPS

American Rivers, Inc.
Arizona Cattle Growers Association
Arizona Four Wheel Drive Association
Arizona Rivers Coalition
Arizona Association of Conservation Districts
Arizona Public Service Company
Arizona Mining Association
Friends of Arizona Rivers
Grand Canyon Trust
National Parks and Conservation Association
People For the West-Arizona
Sierra Club, Southwest Office
The Audubon Society
The Wilderness Society
The Nature Conservancy, Arizona Chapter

GENERAL PUBLIC

Approximately 1,000 people whose names are on the wild and scenic river mailing list compiled and maintained by the Bureau of Land Management and U.S. Forest Service.

The following material, consisting of the public comments on the draft document and the Bureau of Land Management responses does not appear in the draft document.

PUBLIC COMMENTS ON THE DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

Copies of the transcripts of five public hearings and copies of letters received from the public during the 90-day review period for the draft Arlzona Wild and Scenic Rivers Environmental Impact Statement are contained a separate volume titled Public Comments and Responses.

COMMENTS AND RESPONSES ON THE DRAFT DOCUMENT

INTRODUCTION

The 90-day public review period on the draft Arlzona Wild and Scenic Rivers Legislative Environmental Impact Statement extended from April 8 to July 8, 1994. A notice of availability was published in the Federal Register April 8, 1994 announcing the start of the 90-day public review period. The Arizona state office division of external affairs sent press release announcements to over 220 state and regional newspapers, radio and television stations and other public media sources.

The Council on Environmental Quality Regulations for Implementing the National Environmental Policy Act require federal agencies to respond to all substantive public comments on draft environmental impact statements. Substantive comments are those that address the procedural adequacy of the document or the merits of the alternatives (40 CFR 1500.3). Responses to other comments are optional.

In compliance with these regulations, the concerns and issues identified by the statements at the public hearings and in the letters were carefully read and evaluated. Two types of responses were developed: specific and general. Specific responses address concerns in selected individual letters. General

responses deal with issues and concerns identified by three or more individuals. The public comment and response information is organized into three sections:

- A. Public hearing transcripts.
- B. Bureau of Land Management responses.
- C. General responses to comments in the public hearings and letters.
- D. Letters and Bureau of Land Management Responses

OVERVIEW OF THE PUBLIC COMMENTS

During the 90-day public review period statements were received from 60 people at the five public hearings and 116 letters were received. This overview addresses seven of the most frequent comments.

 A large number of the comments from the public intimated that, in the environmental impact statement, the Bureau of Land Management was either making decisions or seeking to influence the decisionmaking process by identifying a specific proposed action/recommended alternative.

The Council on Environmental Quality Regulations for Implementing the National Environmental Policy Act requires agencies to identify its "preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference" (40 CFR 1502.14).

The environmental impact statement is an analysis of the environmental impacts that would occur if any one of a range of alternatives were to be implemented. It is part of a decisionmaking package that Congress will use to designate rivers to the Wild and Scenic Rivers System.

2. Many of the public comments refer to the eligibility determinations in the wild and scenic river evaluation process.

There is nothing that can be done to change the eligibility determinations at this point. The eligibility of the segments addressed in this document was determined during the preparation of Bureau of Land Management resource management plans. It would be necessary to amend the appropriate resource management plan to modify an eligibility determination.

3. Suitability determinations were another concern in many of the comments.

During 1993 each of the eligible waterway segments was evaluated on the basis of criteria recommended by the Wild and Scenic Rivers Act and the Bureau of Land Management manual section 8351. The results of the evaluation included several suitability alternatives (including no action). These alternatives were presented to the Arizona State Director as a basis for him to select a proposed action/recommended alternative for inclusion in the required legislative environmental impact statement.

As explained earlier in this document, the sultability assessment was not a decision document and was not issued for public review and comment. However, copies were provided to the public and are available for public review at local libraries and Bureau of Land Management offices.

4. Numerous comments pertained to concerns about the acquisition of private lands.

Land acquisition is not included in any wild and scenic river management alternative. Land acquisition plan decisions are made in the records of decision on resource management plans. Any references to land acquisitions in this document are associated with ongoing management actions that would continue regardless of wild and scenic river designations. Economic impacts were another common concern.

 Many comments expressed concerns about the adverse economic impacts of river designation.

These impacts were considered in the eligibility determinations in the appropriate resource management plans and in the sultability assessment. The general response on economic impacts explains in detail why no significant adverse economic impacts were identified in this document.

- Water rights also were the subject of numerous letters. Four general responses (numbers 4, 5, 13, and 14) were developed to clarify various aspects of the public concern.
- 7. Many oral and written comments identified dual designation as a concern. In some cases the dual designation was perceived to be an unnecessary expense; in others the concern was that the protection provided by other types of legislative action (i.e.: wilderness, national conservation area) could not be considered substitutes for wild and scenic designation.

Dual designation does not imply two levels of management. The Bureau of Land Management manual, Wild and Scenic Rivers -- Policy and Program Direction for Identification, Evaluation, and Management, stipulates that the management of "rivers which overlap designated wilderness areas or wilderness study areas will meet whichever standard is highest" (MS 8351.51D1).

There is no implication in the legislative environmental impact statement that any other type of legislative protection can substitute for, or replace, the type of protection provided by wild and scenic designation. The various types of legislative protection have been created to serve specific needs and achieve specific purposes.

Three general responses address these concerns. They are general responses 7 (Multiple Designations), 9 (River Study Area Protection), and 10 (Comparisons).

Each of the 116 letters has been printed in the

final document. The Bureau of Land
Management expresses appreciation to those
who registered statements and wrote letters
expressing their views. The responses prepared
for the transcript statements and letters
concentrate on comments that produced a
change in the document (i.e.: Cienega Creek),
or that question the merits of the alternatives, or
the adequacy of the document. Where possible
and relevant, additional information has been
provided.

PUBLIC HEARING TRANSCRIPTS

During the public review period five public hearings were held. Sbty people presented oral and written comments at the five public hearings. Table CR-1 provides the relevant details. Table CR-2 lists the speakers by place of public hearing.

TABLE 5-CR1
PUBLIC HEARING PLACES, DATES, ATTENDANCE

	Id I Dioco, Prici	
Place	Date	Number registered
Phoenix, Arizona	May 16, 1994	19
Kingman, Arizona	May 18, 1994	9
St, George, Utah	May 19, 1994	18
Tucson, Arizona	May 23, 1994	54
Thatcher, Arizona	May 24, 1994	37
TOTAL		137

TABLE 5-CR2 LIST OF PUBLIC HEARING SPEAKERS (Listed by place of hearing and alphabetically)

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Thatcher (T-5)	J. Luepke	Self
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Thatcher (T-5)	B. Stauffer	Self
Thatcher (T-5)	V. Talley	Self
Tucson (T-4)	B. Beatson	Arizona League of Conservation Voters
Tucson (T-4)	M. Black	Self
Tucson (T-4)	K. Dahl	Self
Tucson (T-4)	M. Denniston	Self
Tucson (T-4)	W. Ellet	Salf
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Tucson (T-4)	B. Fridrich	Self
Tucson (T-4)	C. Goodenough	Self
Tucson (T-4)	A. Inventosh	Self
Tucson (T-4)	S. Jimmerfield	Student Environmental Action Coalition
Tucson (T-4)	P. Klieman	Tucson Rough Riders
Tucson (T-4)	G. Korte	Self
Tucson (T-4)	A. Kreutz	Self
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Tucson (T-4)	K. Scott	Self
Tucson (T-4)	R. Tetrault	Tucson Rough Riders
Tucson (T-4)	R. Thompson	Tucson Rough Riders
Tucson (T-4)	T. Zielman	Self

Comments to which the Bureau of Land Management responded are identified in the

copies of transcript hearings. The comments range from T-1 (Phoenix) to T-5 (Thatcher).

BUREAU OF LAND MANAGEMENT z WILD AND SCENIC RIVERS 1994 LETE HEARING 5 6 7 ORIGINAL Phoenix, Arizona May 16th, 1994 6:30 p.m. 10 11 12 1.3 14 15 16 17 16 19 20 21 22 23 Prepared for; Reported by: Laura M. Roslowski Court Reporter 24 2.5 (JANIBINAL)

WIDO AND SCENIC RIVERS 1994 LETS REAMING, Commenced at 6:30 p.m. on May 16th, 1994 at the ASU Downtown Center, 3rd Floor Conference Room, 502 East Monios, Phounix, Arizona, before GAURA M. ROYLOWSKI, a Notary Public In and for the County of Harloopa, State of Arizona.

AFFBARANCES:

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For the Bureau of Land Menagement:

Larry Rawer, Hearing Officer Phil Moreland

BARTELT & KENYON

Phoenix, Arizona May 16th, 1994 6:30 p.m.

PROCEEDINGS

BARTELT & RENYON

BEARING OWN[CRR HADNE: This mosting will now come to order. I have a few introductory comments to make before I call on anyone who wants to upwake.

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My name is Larry Bauer. I'm the Arizona Burnau of Land Menagement Deputy State Director for Mineral Resources. I have been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior.

On my right is Thil Noreland, Chief of the Branch of Planning, Environment, Lands and Recreation in our state office. Later I'll sek him to summarize what we've done so far in this legislative Wild and Scanic River process. I think we also have some Phoenix district menagers here. I see Bill, whose last name I've forgotten, in the back, from the Phoenix district.

On my laft is the official reporter, Hs. Rozlawski, from the Bartell & Kenyon reporting firm in Phoenix.

BARTELT 4 RENYON

I hope each of you uigned the attendance sheet. The attendance sheet allows you to indicate whether you want to speak tonight or submit written comments. If you didn't sign as you case in, and you want to speak, raise your hand and we'll see to it that you get the chance to sign in. Ke.
Williams, in the purple dress, will take care of that out in the hall. After this introduction, I'll call on those who have indicated they want to speak.

This public hearing is required by statute. The purpose of this public bearing is to receive comments on the draft Arizons Wild and Scenic Rivers Legislative Environmental impact Statement.

A transcript of the meeting will be made by Ma. Kozlowski. The transcript will be reproduced in the finel Ungislative Environmental Impact Statement along with appropriate responses by the Bureau of Land Management officials. The final Mild and Scanic Rivers togislative foviconmental Impact Statement also will include public latters and responses and will incorporate any revisions or changes resulting from the comments at this meeting and from public reviews and other meetings.

BARTELT & RENYON

We enticipate that the final beginlative Environmental Impact Statement will be evailable for public review in December.

This public hearing is part of our offerts to invulve the public in preparation of this environmental document. We officially started the process with the Notice of Intent published in the Tedoral Register on February 19th, 1993. The Notice of Intent included a statement encouraging the public to submit any lastes or concesses to we.

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During March and April of 1993, we held
13 public scoping meetings in Arizona towns and
communities and one in St. George, Utah.
hpproximately 500 people attended those meetings.
In early April of 1994, we mailed out nearly 2,000
copies of the draft Legislative Environmental Impact
Statement for public review and comment. We will
accept comments on the document until July 8th,

As I mentioned, the final Legislative Impact Statement will be ready in December. There will be a 30-day public review and comment period for the final document. After the final public review period the Shato Director will send the Shato Director will send the

BARTELT & KENYON

in Manhington. Them it will be transferred to the Sendotary of the Interior, who will forward it to the President. From the President, the Environmental Impect Statement will go to Congress which will make decisions on which Arizona rivers will be included in the National Wild and Scenic Rivers System.

Finally, before I call upon Phil, I want to specify the ground rules for the public hearing. It is important to emphasize that this is not a debate or a question-and-ahaws: geriud. It is not a cross examination by the public of BLM. It is rather, an advisory hearing in which the public is given an opportunity to make comments for the record. These comments will eventually be submitted to our Machington office, the Sacratary of the Interior, the President, and Congress.

BLM personnel will not be expected to respond to questions during the meeting, unless I rule otherwise.

After the menting they will be available to talk individually, or you can contact them during office hours. Speakers should be allowed to unsplace their presentation without interruption. Applause is not necessary.

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If we have time, I will open the meeting to gameral comments after the speakers are finished.

As I mentioned, Phil Moruland will briefly summarize what we have gone through in properting this Legislative Environmental Impact Statement.

Phil.

HR. HORELAND: Thank you, Larry. Good evening, ladies and quatlemen.

There are three items I would like to mention in summarizing the development of this Locislative Environmental Impact Statement.

The first concerns the purpose of the document. Briefly, the purpose of the Legislative Environmental Impact Statement is to provide Congress with a data base and alternatives which they can use to decide which, if any, rivers should be included in the National Wild and Scanic Rivers System.

The Arizona BLM developed the Legislative Environmental Impact Statement in compliance with the Mild and Scenic Rivers Act of 1968 that requires federal agencies to study potential mational Wild, scenic and recreational

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The main consideration in this Environmental Impact Statement is the range of management alternatives. In the statewide document, which is the elimes of the three documents in the Enginlative KIB, we analyzed the impacts of four different alternatives. One was the proposed action to recommend 13 river study areas to Congress for inclusion in the National Wild and Scenic Rivers System. Another was the "No Action" altornative. which means that BLE would not recommend any river study areas to Congress. The third elternative recommends to Congress only those portions or segments of river study areas that are not now protected by wilderness or national conservation area etatus. And the last allernative recommends all 20 of the river area studies.

Second, I would like to summarize the staps that took place in the process of producing this pagislative Environmental Impact Statement,

Over the past several years, BLM has developed resource management plans and plan amendments that involved evaluating rivers to determine whether they should be considered for wild and agenic river status. Through these plans, 20

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river study areas were identified and determined to be eligible for consideration.

While BLM was doing this, the Azizona River Coalition, in Merch 1991, studied and recommended 40 Azizona riveze for wild and sconic consideration. 14 of these were under BLM management responsibility.

In 1992, the Arizona Congressional
Delegation encouraged BLE to develop additional
studies to facilitate the process. This resulted in
a detailed document known as the Mild and Scenic
River Assessments. These were completed in
September of 1993.

The Wild and Scenic River Assessments document contained an evaluation of each of the 20 rivers RAM districts had identified as eligible in the planeing process. Although the assessment was developed primarily for internal use, copies were sent to congressional delegation and several other internated marties.

We used this assessment document as the basis to identify the river study areas for the proposed sution alternative in the Environmental impact Statement. Sowever, each of the river study areas has at least two alternatives: the unuponed

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action and the polection alternative, and that's in the individual Environmental Impact Statements, the two other larger documents that are part of the three book set.

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Some of the individual documents have a third alternative, recommending either the entire river study area or portions of it. This draft Legislative EIS was produced during the fell of '94 and upring of '94 and filed with the Environmental Protection Agency and released for public review and comments on April 8, 1994.

Pinelly, I want to talk a little about public involvement. We in Arizons elicusly believe in the full public involvement process. In this case, our public involvement efforts started with the resource management plans and the plan amendments. We encouraged the public to identify issues and concerns that sended to be considered in planning. We sent the documents out for public review and comments and revised them accordingly.

When we decided to prepare this document, we announced our place in the Pederal Register and local papers. In the announcement we saked for public comments. In March and April of last year, we held 16 public ampling seatings held

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throughout the state and again in St. George, Utah.

Over 500 people attend these meetings and many sent
comments to us. By the way, these comments are

enmmarized in Chapter 5 of the statewide rivers document.

He also mailed out three issues of our

Wild and Scanic River updates to over 1,000 people who have been esked to be on our mailing list.

These updates have kept prople informed about the process and the progress that we have made.

nest month, we staited another important phase of public involvement — this public hearing is a part of it — the public review and comment process on the disfit document. And we are very anxious to know what you think about the Wild and Scenic River alternatives.

Mach comment we receive tonight, and any other comments we receive in the mail prior to July 0th, will be carefully read and responded to as appropriate. The public comments may result in changes to the document. The comments and responses will be published in the final document. They will be sent to the Secretary of Interior and forwarded to Congress in an aid to making decisions about adding rivers to the National Wild and Sconic Rivers

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System.

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Again, we would very much like to have your input and your nomments and we appreciate it. I will give it back to Larry now. And as he mentioned, this is a formal hearing and not a quintionnend-answer forum, so I won't be asking if you have any questions now, but I will be around after the meating and some of the other BLM people will be here also. So if you would like to talk thon, we can do that.

HEARING OFFICER BAUER: Thank you,

Phil.

At the present time I have Indications that sight people would like to speak tunight. I think what I will do is start out by allowing each person 10 minutes to speak, that'll give us enough time to get through the entire round. And if people have additional things to say after that, we'll nextainly allot as much time as is left that we have here to do that. This building closes at 10:00 tonight, we have to be out of here by then.

Pirst of all, I'd like to mak if there is a member of any congressional staff who's here and would like to make any comments.

SPEAKER: I don't have any commente,

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Just here for absorption. protective designations that are available. 2 BRARING OPPICSE BAUBRE All right, mir. 2 We feel that there are different types When I call on you to speak, please of protection that is afforded by the Wild and Sennic Rivers Act than there are by some of these state your name, where you're from and who you represent or if you're speaking for yourself. other protective mechanisms and therefore, the Those who have come with written public should be more awars of the different types of protections that are available under such of those protection actions. п The first person 1 would like to call on Secondly, we'd like to point out that 10 is Pam Hyde. 10 the Gila box management plan, as for as we know, is ME. KYDE: My name is Pam Hyde. I'm a 11 11 still a draft plan. Throughout the LEIS, the Gila 1 Z resident of Phoenix, Arizons and I'm representing 12 box plan is represented as being mementially a final T1-2 American Rivers. Apartican Rivers will be submitting 1.3 plan, that the recommendations in that draft plandetailed written comments in response to LEIS, but I will be implemented as management actions. We would 14 would like to make preliminary comments at this like to have the final EIS point out if the Gila box 16 1.6 management plan is still a draft at that time --17 1'll start with a number of general 17 that it is a draft and those management actions may comments we have in response to the LEIS. First of 18 10 19 all, given the legislative protection alternative 19 We would also like to recommend that the 20 dayslaned by the BLM, we believe the BLM needs to 20 individual studies of the individual river study spoll out more clearly the different levels of 21 21 areas, if the preferred alternative recommends that T1-1 protection offered by not only the Wild and Scenic 2 Z the study area is consultable, that the reasons for 2.2 Rivers Act but also the Wildersess Act, the Riparian nonsuitability should be specified within each of Mational Conservation Areas, and other national those individual river study alternatives. 24 25 conservation Arman, and ACECE, and any other 25 At this point, I'd like to make some SARTELT & RENYON comments on the specific river study areas that were believes that there's no need to weit to coordinate included in the Rivers Appendix. with Dish and Nevada. The Virgin River is an First of all, American Rivors bolistes extremely threatened system at this point and since that the Cienega Creek should be found enitable. T1-4 it is both eligible and suitable, we believe that T1-3 The reason given for its nonsuitability was that the BLM should go ahead and recommend the Virgin it's not of national significance. Bowever, the River for inclusion in the National Wild and Scenic Wild and Scenic Rivers Act does not require that a Rivers System. Other sequents in Utah and Nevada river be nationally aignificant in order for it to can be added later, there's nothing that precludes be suitable. Also, Cienega Creek is one of the last those segments from being added once these Arizona 10 Cloneds-type rivers in the Southwest, for that 10 portions have been designated into the system. reason it's vory valuable and should be protected American Rivers would also like to 11 11 under the Wild and Scenic Rivers Act. Also, it comment on the Hassayampa River study size. We 12 12 13 supports native fish populations, which many of us 13 believe that at least Segment C should be found 14 know is a very reso occurrence in Arizona and is 14 enitable and protected under the Wild and Scenic another argument in support of the protection under Rivers Act. There is a dam proposal every couple of 15 15 years in the Box Canyon on the Hausayampa River. A 16 16 We would also like to comment on, dam is a pretty ludicrous thing on Bassayampa River, 17 17 specifically on the Virgin River. The preferred 16 16 for those of you who know it. there's not a lot of alternative contained in the LHYS is to recommend eurface flow. A dam would create more of a mid flat 19 19 then a reservoir. For that reason, the local 20 20 study river under the Wild and Scanic Rivers Act. 21 residents of Wickenburg, the Wickenburg Horseman 22 The reason given is that the BIM believes that 22 Association, a number of other individuals, groups, Congress should have coordinated afforts between 23 Amorican Rivers included, believes that a dam is 23 Arizons, Utah and Nevada since the Virgin River 24 completely inappropriate on the Heasenyempa. 24 flowe through all three states. American Rivers wild and scenic protection would BARTELT & KENYON BARTELY & KENYON

preclude further consideration of a dam. We helieve that this is a good reason to have that section included under the Wild and Scenic Rivers System. American Rivers also believes that the

Non Podro should be found suitable as a scenic river. Min recommends that its classification be reurestioned, the reason given being there's a number of road crossings, a railroad that parallels the river through must of the study area. However, the San Padro is still relatively undeveloped along the shoreline and would benefit from a more restrictive management that would be provided under evenic classification.

American Rivers also believes that Francis Greek and the upper portion of the Santa Maria that were found not suitable should also be found suitable and protected under the Wild and Scenin Rivers Act.

As I mentioned, American Rivers will be ambmitting more detailed comments in the Legislative ggs at a later date.

Thank you.

ABARING OFFICER BAVER: Thank you, Ha.

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The next person I call upon, Jim

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Wormley.

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MR. HORNLEY: That is my degreet name. I've been in Alizona now for the post 17 years as a retired parken. And during these 17 years I have been physically and mentally, technically active in supporting especially through BLM and the Forest Service and the like because I'w very interested in conservation; therefore, I've been on the ground a great deal during those past years. I wish to make a brief comment and then later on Don Cox, who is a pal with me, and we work together, a retired forest ranger, will have comments more in detail.

My nomments are those in general. That there are so many mends in this mation, and let's any specifically in Arizona, for things that need to be done in conserving and saintaining in the best order our national resources that I would hope that no foulish expenditure will ever be made that would detract from the proper and correct management of these very, very important resources. Arizona is plush with national resources, some of the greatest in this would that I've ever even. And my life has been in the world, business took as into many parts of this world. I surved in World War II as a combat

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wnglneer.

And I really hope that enjoyed that recommends that we do anything about the nature of this, wild and Scenic River included, will give long thought to where should we put what sonice and what efforts we can bring forth to further keep our natural resources in the best possible order.

In all these months and years now through this nation I would have to say that I would really question, question very hardly a decision to activate wild and scenic care in possibly more than, not more than five of those listed on this page.

I will drop it there and leave it to my much more able-to-describe-cur-thoughts Don Cox when his turn comes.

Thank you.

HEARING OFFICER BAUER: Thank you,

18 Mr. Wormley.

I would now like to call on taulia

20 Caoper.

MS. COOPER: Good evening. My name is Leal's Cooper. I represent Clayton Jacobson, a land owner along the Bill Milliams River area. He owner virtually all of the private land in asgment, what's being called as Sagment B of the Bill Milliams

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River. And I'm here to speak on his behalf this evening. We will be submitting lengthier comments on the Legislative Environmental Impact Statement before the comment period ends that are more detailed. I would just like to strass a couple of points born this evening.

First of all, it doesn't, the Wild and Sconic Nivers Act does not appear to grant to the Federal Government any right to affect private land, scoething that the Legislative Environment Impact Statement seems to recommend and that we want to remind the BLM of.

Nonetheless, I also want to mention that the designation of the Bill Milliams River as wild and scenic in Segment B will have an adverse impact of Le Par County. Much of that county is already government-owned land and this could potentially have an effect of further restricting economic use of that land and economic development of that area. And I understand that the Government does provide substantial payments in lieu of taxes to Le Par County, but that is not the same thing as economic development, which increases the number of people who are paying taxes and the amount of money that

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they are paying an apposed to just shifting the over. Despite the fact that there's been a lot of money from one pocket into another rather than 2 devastation, there's still a lot of fish and wild creating wealth. life value to the remaining streams. There's a jot Thank you for your consideration. of people that enjoy the recreation that's left on SEARING OFFICER HAURE: Thank you, these streams. So, in general, I do support the мы. Соорых. proposed action. I'd now like to call upon, I'm morry I will be submitting some written about my pronouncing of the last name, Mr. Tim comments when I'm able to plow my way through the two appendices, but I would just like to comment on MR. FLOOD: Good evening, my name is 10 two streams that I thought needed a little more Tim Flood, like lots of water. I'm from Phoenix. 11 emphasis: One is the Masseyampa because it's a very I'm representing myself tonight. 17 important giver on the central western side of the I generally support what BLM is doing in state. There's very few remaining flowing streams 17 trying to put forth a very strong Wild and Scenic 14 on the central western side of Arizons. Rivers proposal. The shape of Arizona's rivers and And the other is the San Pedro River. 15 streams and creeks is not very good and I think it. That's a very threatened system down there and a gnflocts a lot of poor decisions in management over 17 very valuable echo system and I would recommend that the last 100 years. A lot of that, of course, is 18 BLM go for the strongest possible designations on not BLM's fault, you have inherited what those folks 19 the Son Pedro River to insure that any lurther before it have done to the land. But there's not 20 development that does occur in that part of the much laft and what wairs dealing with now in the 21 state take into account the great ecological value leftowors. We've given the extractive people over 22 of the San Pedro River. 100 years' headstart to do their thing and what we 2.3 That will conclude my oral remarks and T are, egein, dealing with In whatever is laft over. will submit the written once at a later time. It's Vory valuable still what's left Thank you. BARTELT & KENYON BARTELT & RENYOR 23 BEARING OFFICER: Thank you, Mr. Flood. rivers that I've been to and enjoy a lot, and are The next person I call upon is Mr. Jim fairly low risk. They're already in a wilderness NeCarthy. area and there's really no threat, so it's kind of MR. McCARTEY: Good evening. My name an camy one. There's a few other ones that I think are very important rivers that I think need to be I've lived in Arizona mince 1957. And protected; for instance, Cienega Crook, emporially because of the native fish and because of the characteristics of the area are very nontypical to 1 o Arizone streams, and I think we need a sample of 11 that type of atreem in the state protected. 12 As far as the Virgin River, I recommend 13 that we recommend that for designation and not for T1-8 14

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is Jim McCarthy. I'm from Phoenix, Arizona. And I'm representing myself.

over that period of time I've seen a lot of damage to the eignificant large rivers of the state and some of the smaller streams. And then there were many other projects that took place before I lived here that were also damaging. So what we have, as Mr. Flood muntioned, in that we have a new remaining rivers that we need to, that we need to protect. Maybe that's 10 percent, maybe it's 30 percent of the rivers, I don't know what the real number is, but there's not beny compared to what there once

I'm glad to see that the SLM has recommended some rivers; however, I'd like to cumment that I think that there's some other ones that are very diserving of protection that are not on the recommended list. Some of the rivers that are recommended are what I might call luw risk, for instance like the Peris and Aravaipa, which are two

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further study. If the Congressional Delegation is not ready to designate that, they won't, but I don't see any reason that the DUN cap't recommend it at this point in time.

I'd like to also point out that the intent of the Wild and Scenic Rivers Act is -- I'm not lecturing you so much, but I'm trying to get the word out to the public, that the Wild and Scenic Rivers Act is not really intended to destroy or take away anything that exists, what it's intended to do is protect things in the state that they are. The for remaining rivers that are still undamaged, we

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want to protect those few.

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As far as the impact on the Government and budgets, the land is strongly under SDK suthority, it strongly has to be managed. I can't see how designating it as a wild and sensic river is going to have any significant cost increase and if it is, we need to become sure efficient. We should not let that get in the way of protecting these

That's my comments for tonight.
Thank you.

 $\label{eq:hearing_officer_daugh:} \textbf{Hearing_officer_daugh:} \quad \textbf{Thank you,} \\ \textbf{Mr. McCarthy.}$

The next uposker is Mr. Don Cox.

MR. COX: Thenk you. I'm Don Cox. I'm
the environmental chairman lor the Lyona
International, State of Arizona. I've spent 45
years of my adult life in Arizona. I have been a
land renounce wanayewent professional my entire
life.

Now, the designation of the Wild and Scenic Rivers, I'm certainly in favor of them if it is justified to so designate them. They already have in Arizona, for instance, 40 wilderness areas or similar designations, we have the park service

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has a lot of land, the national parks, monuments, we have the wild life embtacries, we have the Indian lands that taken a lot of Arizona, we have conservation special areas. Now, if we have the wild and Scenic Rivers, I don't think there'll be much land left maybe except my own little acreage in Sec. (1997).

I wouldn't designate today any special rivers. I've seed the Buseau of Land Hanagement brokletu on that, and probably time will prevent me, but on the list with regard to the situations tonight, there are four, only your of them that I would recommend that we designate.

It bothers me a great deal to think that our dry washes and intermittent streams would be classified as Wild and Scenic Rivers. There are an many wild during the flood stage, but wild and scenic, it bothers us a great deal.

Now, another thing that bothers we on the designation is you designate a section of the stream, but also there's a great deal of concern that upstream from there if anything taken place upstream from their that would influence this small section that would also be restricted.

Now, the Bureau of Land Management and

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the Porcet Service are professional land managers, and a lot of these atlesus now are under their management, and to say that We need to designate them in to me to say we think they are not duing a very good job. I think they are. If there is a problem on any of these streams, those individuals, those organizations certainly have the ability and the personnel and the authority to make any corrections to that.

I've heard tonight a great deal said about damage that has occurred as if we are continuing to demage them atteams. I think we missed the point. And the fact that I need to bring out is that in a great many cases tising the land up and putting it is a rectrictive situation is the worst thing that can happen to that land bucsuse under proper management, the use of live stock and wild flower, under proper management can bring back a desired condition of many of these areas.

Now, I mpent 15 years as a district torest ranger in the West before I found the key to the fact that you can bring back and maintain our streams under proper use of live stock better for dwelybody concerned, which life and all, then if you nie is up and not use it. I think the Lord intended

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that our land should be used, properly used and we can get the best results from that. Just like if you didn't own your loft arm, it would finally deteriorate and, believe you me, that's what happened to some of our lands when they're are tied up and not properly used. And we need to bring those things back, and I have confidence that our organizations can do that, without tieing up morn and more.

We need more multiple one of dur resources because we have no few of them and not single use, which is what we're going towards on all these designations. As I mentioned, Arizona is full of single use lands now under management. We invorably don't need really any sure. Private land is a great concern where these rivers are adjacent to them or they're upstream because I can see in the law, as I understand it, that if something happens on your private land up there it might influence the designated wild and scenic river, that they would be greatly restricted.

T will also submit, and have, and will submit, additional information to the organization. And I thank you for this opportunity and may we all join in securing the hetter use of our land

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	resources,	,	The next speaker le a possibility, who
2	Thank you.	•	says he might epeak, which is Mr. Jim Vaaler. Do
,	BEARING OFFICER SAUER: Thank you,	а	you winh to appak, mir?
4	Mr. Cox.		MR. VAALER: You, Y will appeak. Hy
5	The next speaker is Hobbin Holaday.	,	name in Jim Vactor of Phoenix, I'll be speaking to
6	MS. HOLADAY: My name is Bobble Holaday	, i	myself. I'll be brief.
,	and I'm the executive director of a group who is	,	I would like to thank the MAM for
	weeking to preserve another one of our national	, 8	recommending the 13 rivers they did recommend. And
9	zamouzena. The group is called Preserve Arizona	٩	I would like to comment that Wild and Scenic Rivers
10	Wolves, which would like to restore the Mexican	10	the wild and Scenic Rivers classification does fall
11	wolf.	•	
12	I have very short comments. I cortainly	11	under the lines of multiple use, it's not single
12	think that the Bureau of Land Management did a very	T 12	use. Specifically, I was disappointed that the BLH
		T1-12	didn't recommend the Rassayampa River. I feel that
14	thorough job on their document for the draft BIS;	14	there was a middle ground that could have been done
15	however, 1 am appropriative of the 13 givers which	15	where they could have drawn their boundaries a
16	they have proved for wild and accenic to some	16	little differently and come up with a good proposal
17	classitication. But I would also like to fully	17	there.
18	support the Arizone Rivers' recommendations that you	1.6	That's all I have to say.
44 l 19	add the portions recommended for Ciences Creek, San	19	Thank you.
11 20	Pedro and the Massayampa Mivors. I think they are	20	BEARING OFFICER BAUER: Thank you,
- 21	very important to the system.	21	Nr. VAAler.
2 2	Thank you very much for this	2.2	The next speaker is Mike Evans.
23	opportunity-	2.3	HR. EVANS: Good evening. My name is
24	REARING OFFICER BAUER: Thank you, Mr.	24	Nike Evans. I'm from Gilbert, Arizona. I'm the
2.5	Holaday.	2.5	chairman of the Maricopa County Democratic Party,
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1	that's 450,000 registered voters that care about the	1	going to be a final report prepared for December of
2	that's 450,000 registered voters that care about the environment, but I am speaking for myself this	2	qoing to be a final report propared for December of
2	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening.	2 3	qoing to be a final report propared for December of '94 and something to be submitted. Well, Sam Copperemith won't be a
2 3 4	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening. Seems close to shout two years ago, a	3 4	qoing to be a final report propared for December of '94 and something to be submitted. Well, Sam Copperemith won't be a congressment then. John Kyle won't be a congressment
2 3 4 5	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening. Seems close to shout two years ago, a year and a half ago, we all got together over at the	2 3 4 5	quing to be a final report propared for December of '94 and something to be submitted, Nell, Sam Copperemith won't be a congressmen then. John Kyle won't be a congressmen then. They're both resping for the U.S. Sunate. So
2 3 4	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening. Seems clown be shout two years ago, a year and a half ago, we all got together over at the Civic Flaze with the NAN, Forest Service, I believe	3 4	quing to be a final report prepared for December of '94 and something to be submitted, Well, Sam Copperemith won't be a congressment then. John Wyle won't be a congressment then. They're both reneing for the U.S. Sunate. Sobviously they are not going to have the opportunity
2 3 4 5	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening. Seems close to about two years ago, a year and a half ago, we all got together over at the Civic Flaze with the NAM, Format Service, I believe Park Service was there, and the majority of our	2 3 4 5, 6	quing to be a final report prepared for December of '94 and something to be submitted, Nell, Sam Copperently won't be a congressment then. John Wyle won't be a congressment then. They're both renning for the U.S. Sunate. Subviouely they are not quing to have the opportunity to vote for Nild and Scenic Rivers, something that
2 3 4 5 6 7	that's 450,000 registered voters that care about the environment, but I am speaking for myself this evening. Seems close to about two years ago, a year and a half ago, we all got together over at the Civic Plaze with the NAM, Forest Service, I believe Park Service was there, and the majority of our Congrassional Delugation. At that time, I asked the	2 3 4 5 6 7	qoing to be a final report propared for December of '94 and something to be submitted, Nell, Sam Copperemith won't be a congressmen then. John Kyla won't be a congressmen then. They're both rooming for the U.S. Sunate. So obviously they are not going to have the opportunity to vote for Wild and Scenic Kivers, something that both of those gentlemen ison, two different
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it's clear from all of the polls, all of the studios that have been done, that the esperity of people in Arizona want additional Wild and Scenic Sivers.

To addition to ignoring the winder of

the public, you're also iquoxing the wishes of our elected representatives. You should be ashamed: Flease do your job, give us our Wild and Scenje Rivers.

Thank you.

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REALING OFFICER: Thank you tor your comments. Hr. Evans.

The next speaker is lowerd Giemso.

MR. GIEMSO: My name is Howard Giemso.

T represent Motorized Recreations.

I was at that menting two years ago also. I heard the democratic menator, I think his name was paConcini, he said, "I'll see the report from the RM. I'll see the report from the Forest Service. I'll see the report from the state. I'll consult with My constituents and then we will reach a consensus within the Congressional Delegation and then we'll move and out before." That's the way I remember the democratic senator's words.

I would also may that with Muturizud
Recreations I septions motorized access. I think in

HARTELT & KENYON

a way I speak los the huntons who want to drive to their hunting apot, fishermen who would like to drive in closer to their spot, perhaps a casual gold panner would like to use his motor vehicle to get to his site, perhaps some picnickers who would like to use a car and drive on federal land, all those people need sotorized vehicles on federal land. I submit that Wild and Scenic Rivers designation would reduce their access to their land.

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I would like to point out again that those is approximately five million acres in Arizona of extremely restricted use land. Five million acres where meter vehicles enver qu. Now we find many proposals on the table seaking to add to those tive million acres, among thom well recovery habitat.

I submit that our Congressional
Delaystion should concern themselves with protecting
the public's use of the public land from the
pronouvations that they should. And I submit that
the proper action is no action, the no action
alternative on all of the rivers.

Thank you.

BEARING OFFICER BAUER: Thank you, mir.

Done anyone slass wish to speak tonight?

BARTELT & KENYON

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MR. KELLER: My name is Gary Keller.

Need or one working on in a horder-to-burder trail that you wild the way from Canada to Kerico. It does or one working on it a horder-to-burder trail that you are working on it a horder-to-burder trail that you are working on it a horder-to-burder trail that you are working on it a horder-to-burder trail that you are working on it a horder-to-burder trail that you will the way from Canada to Mexico. It does cross neveral of these rivers and if they become wild rivers, then there's areas that you

we are trying to work on the economic rural dovelopment, some of the tural communities by going through with the Great Mestern Trail and we family that some of these rivers will hinder that goal. Some segments of the rivers are not, we feel, are not correct. Some sequents start above a road crossing, a croasing that everybody is using right now, and we feel if there is such a thing as a wild and scenic rivers bill, that we would like to amend some of the segments.

We have been working lately with the

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Arizona Rivers Coalition and come to some agreements on those segments that I've been talking about.

Some of the segments, some of the rivers that wa're in disagreement with is the upper Surro Creak.

Me are working on a border-to-border trail, it's a multiple-use trail for whiches as well as hiking, horseback, just anybody can use it. The Great Western Trail is else the same and it goes from Utah -- well, the Arizona unction goes from Utah to the border, Burro Creek on the east. The only way arroan from one side of the state in that area to the other is going across Burro Creek. Our understanding is that if this area is designated wild, then all river crossings, motorized river crossings will be shut off.

An lax se the demand in our rivors, I've been in the back country continuously for the peat sh years and I have seen no eignificant demand to any of the streams as far as vehicle crossings that haven't been mitigated or haven't been addressed. The eignificant damage that we have had in 1983, or 19 -- yeah, 1983 and 1993 with the extreme thood dam is far greater than any other people can do with vehicles or cattle.

And I disagree with the gentleman before

BARTELT & XENYON

me that all Aritohans are for Wild and Ecunic Sivera hecause the people I talk to are not.

Thank you.

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BEARING OFFICER BAUER! Thank you,

Does anyone electwish to speak? If not, I want to remind all of you, and strongly urge those who have not spoken, to send your comments to us before July 8th. The Mailing address in printed in the cover letter attached to the draft legislative Environmental Impact Statement. Send your comments to Phil Moreland here, Bureau of Land Management, Post Office Box 16563, Phoenix Arizona, 85011.

At this point, if nobody wise wishes to make a comment, I thank you very much for your kind attention. This public hearing is hereby adjourned.

(Bearing concluded at 7:30 p.m.)

BARTELT & KENYON



STATE OF ARTSONA

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COUNTY OF MARICOPA BE IT KNOWN that the foregoing hearing was taken before me, LAURA KOZLOWSKI, a Wotary Public in and for the County of Maricopa, State of Arizona; that the proceedings thereto were taken down by me In shorthand and thereafter reduced to computer-aided transcription under my direction; that the foregoing is a true and correct transcript of all proceedings had upon the taking of said hearing, all done to the best of my skill and ability. I SURTHER CERTIFY that I am in no way related to may of the parties hereto, nor am I in any way interested in the outcome hereof. day at May NOTARY PUBLIC

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BARTRUT & XENYON

(ORIGINAL) BURDAU OF LAND MANAGEMENT Court Reporter 2 WILD AND SCENIC RIVERS 1994 LEIS BEARING. IN RE: commenced at 7:00 p.m. on May 18th, 1994 at the WILD AND SCENIC RIVERS 1994 LBIS REARING Mohave Community College Student Center, Room 196, 1971 Jagereco Avenue, Kingman, Arivona 86401. before LAURA M. ROELOWSKI, a Notary Public in and ORIGINAL for the County of Maricops, State of Arizons. 10 19 Kingman, Arizona May 18th 1994 7:00 p.m. 11 11 APPEARANCES: 17 12 23 13 For the Bureau of Land Management: 15 Larry Bauer Phil Moreland 16 16 17 17 16 14 19 19 20 20 21 21 22 22 23 23 24 94 Prepared for: Reported by: LAURA M. KOELOWSKI 2.5 BARTELT & KENYON BARTELT & KENYON Kingman, Arizona May 18th, 1994 6:30 p.m. 1 On my left is Laura Rozlowski, she's our official court reporter and will take an accurate 2 2 transcript of everything that is said here tonight. the to from the Bartelt & Kenvon Court Reporting PROCERDINGS service in Phoenix. BRAKING OFFICER BAURR: Cood evening. 5 Ladies and Gentleman. This meeting will now come to I hope that each of you signed the order. I have a few introductory comments to make 7 attendance sheet. The attendance sheet allows you to indicate whether you want to speak tonight or before I call on anyone to speak. A submit written comments. If you didn't sign in as My name is Larry Bayer, T am the 9 you came in, I hope you would. And later on after I Arizona Sureau of Land Management Deputy State 10 10 Director for Mineral Resources. I have been 11 finish going through the people who did indicate 11 appointed by the State Director of the Bureau of they would speak, if you would also like to speak, 12 12 raise your hand and I'll call upon you. hand Management to gondnot this public bearing under 13 13 the authority of the Secretary of the Interior. The public hearing is required by 14 14 15 On my right is Phil Moreland, Chief of 15 statute. The purpose of this public hearing is to the Branch of Planning, Environment, Land and receive comments on the draft Arizone wild and 16 16 Recreation in our state office. Later, I'll ask him Somnic Rivers Legislative Environmental Impact 17 17 to summarise what we've done so far in this Statemmot. 18 14 legislative wild and scenic river process. A transcript of the meeting will be made 19 19 by Me. Korlowski. The transcript will be reproduced 20 We also have with us Cordon Chemias, the 20 in its entirety in the final Legislative Phoenix District Manager; Judy Reed, the Suman 21 21 District Manager; Levi Daike, the Lake Savesu Environmental Impact Statement along with 22 22 Resource Area Manager, and Ken -- I'm doing just appropriate responses by Bureau of Land Management 23 officials. The final Wild and Scenic Mivers what I did last night, I forgot somebody's last name 24 24 Legislative Environmental Impact Statement also will on Ean, the Kingman Area Manager, Ren Drew. 2.5 2.5 RARTELT & EDNYON BARTELT & KENYON

incolude the public letters and responses and will incorporate any revisions or changes resulting from the comments at this meeting and from other public reviews.

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We anticipate that the final legislative Environmental Impact Statement will be available for public review in December.

This public hearing is part of our efforts to involve the public in the preparation of this environmental document. We officially started the process with a Sotion of Intent published in the Federal Register on February 19, 1993. The Notice of Intent included a statement encouraging the public to submit any issues or concerns to us-

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December. There will be a 30-day public review and comment period for the final document. After the final review period, the State Director will send the Environmental Impact Statement to the SLM director in Washington. Then it will be transmitted to the Secretary of the Interior, who will forward it to the President. From the President, the Environmental Impact Statement will go to Congress, which will make the decisions on which Arizona rivers will be included in the Mational Wild and Scenie Mivers System.

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It is rather, an advisory hearing in which the public is given an opportunity to make comments for the record. These comments will aventually be submitted to our Mashington office, the Secretary of Interior, the President and Congress.

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If we have time, I will upon the meeting to general comments after the speakers have finished.

As I mentioned previously, Phil Moreland will briefly summerize what we have gone through in preparing this Legislative Environmental Impact

MR. MORRIABD: Thank you, Larry.

Good evening, bedies and Gontlemen.

There are three items that I want to

mention in ausmarizing the development of this

The first item concerns the purpose of the document. Briefly, the purpose of the Legislative Environmental Impact Statement is to provide Congress with a data base and alternatives which they can use to decide which, if any, rivers should be included in the National Mild and Scenic Rivers Aystem.

Legislative Environmental Impact Statement.

The Arizona RLM developed the

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Lagislative Snvironmental Impact Statement in compilance with the Wild and Scenic Rivers Act of 1968 that requires federal agencies to study potential national wild, econic and recreational

The main consideration in this Environmental Impact Statement is the range of management elternatives. In the statewide document, which is the thin summery document of the three document parts, we analyze the impacts of Inciementing four different elternatives. One was the proposed aution to recommend 13 river study arman to Congress for inclusion in the National Wild and Scanic Rivers System. Another was the "No Action" alternative, which means that BLM would not recommend any river study areas to Congress. The third miternative recommends to Congress that only those portions or sequents of river study ereas that are not protected by wilderness or national conservation area status will be submitted. The lest alternative recommends all 20 of the study area rivere.

Second, I want to summarize the steps that have taken place in the process of producing this document. Over the past several years, RLM has

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developed Yemourom management plans and plan amendments that are evaluating rivers to determine whether they should be considered for wild end scenic rivers. Through these place, about 20 river error studies were identified and determined to be aligible for consideration.

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 While BLM was doing this, the Arizona Rivere Coalition in Merch of 1991, studied and recommended 40 Arizons river areas for wild and scenic consideration. 14 of these were under RLM management responsibilities. In 1992, the Arizona Congressional Delegation encouraged DLM to develop additional studies to facilitate the process. This resulted in a detailed document known as the Wild and Scenic River Assessments. It was completed in Sectamber of 1993.

The wild and Scenic River Assessments document contained an evaluation of each of the 20 rivers *Xim districts had identified as eligible.

Although the assessment was developed primarily for internal use, it was also sent to the Congressional Delegation and several other interested parties.

We used the assessment document as the basis to identify the river study areas for the proposed action alternative. Bowever, each of the

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river study areas has at least two alternatives. And those rivers are covered in the individual river asguents, which are the two other larger books that go with the three-set system. Each of those has at least two alternatives, the proposed action and the no action alternative. Some of the individual documents have a third alternative recommending either the entire river study area or portions of it. The draft LSIS was produced during the fall of '91 and spring of '94 and filed with the Environmental Protection Agency and released for public review and comment on April 8th, 1994.

rinally, I want to talk a little about public involvement. We in Arizona strongly believe in full public involvement in this process. In this case our public involvement efforts started with the resource management plans and plan swendments. We mecouraged the public to identify issues and concerns that needed to be considered in planning. We sent the documents out for public review and compent and revised them accordingly.

When we decided to start preparing this document, we announced our plane in the federal Register and local papers. In the announcement we asked for public comments. In March and April last

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year we had it public scoping meetings held throughout the state and St. George, Utah. Over 500 people attended the meetings and many sent comments to us. By the way, these comments are summarized in Chapter 5 of the statewide rivers document. That's the thinner of the three hooklats.

We have also mailed out three lesues of our Wild and Scenic River updates to over 1,000 people who have saked to be on our mailing list. These updates have kept people informed about the process and our programs.

Last month we started another important phase of public involvement -- this public hearing is part of it -- the public review and comment process on the draft document. We're very envious to know what you think about the Wild and Scenic Rivers alternatives.

Rach comment we receive tonight, and any other comments we receive in the mail until July 8th, will be carefully read and responded to an appropriate. The public comments may result in changes to the document. The comments and responses will be published in the final document and they will be sent to the Secretary of Interior and forwarded to Congress to aid in making decisions

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about adding rivers to the National Wild and Scenic Rivers System.

I'll give it back to Larry now. And, we he mentioned, this formal hearing process isn't a question-and-answer form, so I won't sak if there are any questions, but I will be around after the meeting and I'll try to answer anything at that time, and there will be additional specialists available. I would hope we can answer your questions.

BEARING OFFICER BAUER: Thank you,

Right now we have three persons who have indicated that they would like to speak. Because of the small number, I don't think that I'll place a time limit on them because we are going to be open for business until about 10:00.

So at this point I would like to call on Mr. Brian Garrity. This microphone in the center of the room is working good, I think, so Ms. Korlowski can hear your comments and so man everybody clas.

MR. GARRITY: Thank you very much.

Just to give you a little background, I
live in Bagdad and I'm a copper minex and have been

mu for about 13 years, third generation. And one of

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the things in going through the draft LBIS, I noted there was no economic impact numbers from the community of what the mining operation contributes to the economy of Yavapai County, so I've provided them a copy of it. And I would just like to address a few of the numbers of the economic contributions.

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The total output of the Arjzone scorney is \$331.3 million. The direct impact on the Arizone economy is \$91 million. It provides a personal income to Yavapai County of \$30 million; purchases of services and goods, \$53 million; etste and local government income, \$8 million. They pay an additional \$4.4 million in property taxes each year.

Am far as in direct payments to Yavapai County, which I realize we are in Mohave County, but \$900 million to Yavapai County, estimated purchases of goods and services of \$180 million, and property taxes, \$132 million over the remaining life of the mine which is anticipated at 30 years.

So in 1993, they produced 135,364 tons of copper, 7.8 pounds of molybdenum, that's nine percent of the Arizona copper production and 6.1 percent of U.S. copper production and about 1.1 percent of the world copper production.

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I didn't really want to burden you with a lot of numbers here and I have provided her with them.

There's two other issues that I would, that I looked at through the draft LBIS. And under the one designation, 93,765 acres would be withdrawn from mineral subjuration and, you know, use, teken out of the public domain, if all of them were desmed suitable. I results that you guys haven't done that. Under the proposal that you guys have presented, 37,221 would be withdrawn from future mineral potential. That's a lot of screage.

I queen I'm not remly highly quelified to talk about geologic ore bodies and they're rather rare by nature and they only occur in certain erman, but based on your guys' information there is mineral potential in these areas that are considering being withdrawn, so that's concerning a little bit.

In closing, and I've been involved in this process since the beginning. I've agen some of you folks at a number of sestings, but, you know, it's a genuine concarn. There's a lot of "" you know, the Wild and Somnic Rivers Act was written with a lot of tough restrictions on it and they put a lot of teeth into the piece of legislation. And I

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think the intent of Congress back into ives or '64, when the act wes implemented, was probably not looking at, you know, intermittent running streams, which a lot of the proposed ones are in Arizona, but there's things like, you know, these outstandingly remarkable values and things of this nature, and I think maybe it's gone a little too far one way.

And I was glad to see that from the Reservices River's Committee proposed down to what it is now. I think, you know, the SLM and the agencies have done a commendable job, but there are still some things there that concern me.

I just would like to close by saying that it's bacome the theatre of the birarra when the, what I feel, you know, valuable productive members of the community, you know, we're having to flight an diligently to make our case heard shows the dam of those who enjoy what we produce and then criticize us of what we produce for all Americans. But that's kind of the way politics are in the '90s, I quess. We haven't been real active in these processes, you know, we've been out working, providing livelihoods for our families and it -- you know, we've kind of got behind the process, I guess.

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And X ampetimes wit around and ceffect and ponder that, you know, who's looking efter the well-being of Aperican workers and American Minera? And that, you know, I know I'm involved in a lot of things in my job there that, you know, there's a lot of Tax specime and if they were declining at the rate that American miners are declining, well, they's be on the Tax list.

So I just wonder (f, you know, maybe we should implement legislation that looks after protecting the citizens of this country. And maybe we have gone so far in protecting the environment that now that outweighs the well-being of the citizens.

and I to appraciate the opportunity to speak to you folks.

Thank you.

SEARING OFFICER SAUER: Thank you,

Mr. Gazzity.

The next speaker is Phil Blacet.

MA. WLACKT: Blacet.

REGRETA OFFICER BAUER: B-1-a-c-e-t.

MR. BLACET: I would also like to them?

you very much to give me the opportunity to speak.

I've been a professional geologist in

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Arizona for 35 years and about 16 of that was with U.S. Geological Survey and the last 15 years I've been at Cyprum Bagdad. I'm a resident of Bagdad. And I've been a tax payor and property duner in west central Arizona for about 10 years.

I would like to reiterate something that strian had indicated, and that is real appreciation for the MLR's efforte on the Wild and Scenic Rivers issue. I think that you have indeed done a very commendable job in terms of reaching a reasonable halance between a wide variety of opinions on preservation issues, especially as they relate to wild and Scenic Rivers issues.

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And I would like to come out and just basically state that in my opinion the preferred action alternative is a very reasonable and, at least from my perspective, acceptable alternative. I would concur that it's the preferred alternative.

There are areas which concern sea.

Basically, they relate to water rights issues. As you're well awars, the Mild and Scenic Rivers Aut of 1968 does have a lot of provisions within it which appear to be threatening to historic water users and certainly future water users. And one of the things which particularly concerns so is in the Legislative

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EIS you make reference to the measurement of stream flows to determine what the requirements are for Wild and Scenic Rivers' purposes. And that's an ares which I think has to be looked at very, very carefully.

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Clearly, you cannot try to menage Wild and Scenic Rivers via appropriation of federal waters based on either the maximum stream flow or even the median stream flow. Some reasonable estimation of the base flow, the minimum flow rate for those stream megments, needs to be determined to determine what reserved federal rights should exist to protect those values.

You can argue whether or not the Federal Government even should be involved in state rights water issues, but given the fact that the Wilderness act of 1990 did for the first time reserve federal water rights for wilderness purposes, it seems to be a fact of life that in all likelihood Congress will write some similar provision into whatever bill relates to the Wild and Scenic Rivers issues.

So I quase I would urge the BLM to be very cautions in terms of how they determine what that base flow that they are going to protect is. And clearly, if one was to do what was done by the

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where in terms of the unique water protection areas where they came in and sampled on a quarterly basis over the course of a year, you're going to get an extremely bias setimate of what those normal minimum flow rates are, unless you happen to be extremely lucky.

I think that wherever possible the USGS stream gauging data, which goes back in many cases over two decedes, should be used and should be extrapolated from to try to determine what a normal base flow is.

The reason why this is so important is of nouran all upstream water users, those which have surface water rights, and those which do not have surface water rights but actually have wells which may done to be pumping surface water underflow, this is a vary, very touchy legal question which is not yet resulvad in the courts, it is in the courts now, but it has not yet have resolved. What it means is that a lot of property owners who don't have surface water rights but do have wells which are mear or within the broader flood plains may suddenly find that they are pumping surface water rather than ground water. And at that point in time, they would be in direct competition with the Paderal

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Government. They would not have had historic water rights, surface water rights because there has been no need up to this point to try to determine surface water rights from somebody pumping water from their wall on their own property. So these people do have the potential to suddenly find themselves in competition with the Federal Government in terms of surface water down such atreams as the Santa Maria, the Hessayamps, all the atream segments in the NAM proposed, or Legislative 875.

In supmary, I would just like to repeat that I feel that overall the effort has been very quod. I certainly appreciate all of the efforts to have the public involved in the process. And I certainly support the preferred action alternative.

BEARING OFFICER BAUER: Thank you,

The next speaker is Mr. Bill McClure.
MR. McCLURE: Good evening and thank

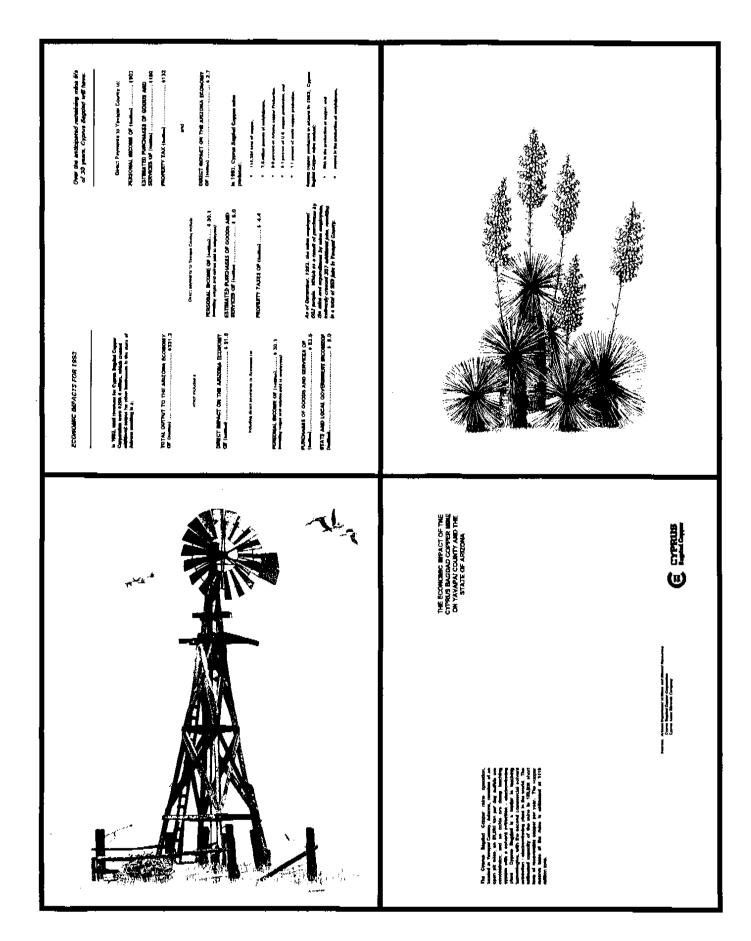
First off, I'd like to say I'm no where near as eloquent as Dr. Blacet here in what I have to say.

I also am from Bagdad, but I'm not

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make and know what it's like. And, if anything, approaching you as a miner from Bagdad, i'm approaching you as a citizen of public land use. I've seen nothing but improvement over the years gree up in Bagdad. I've been there all my life. 3 even without the designation of being a Wild and live been on probably every bit of the surro Creek Sennie Mivor. area from the very start down to where it gets into The company that I work for has received the Alamo area. I have a lot of friends who have a Riparian Stewardship award for the efforts that ranches in the area. I've done lots of hunting in they've made in environmental compliance and doing what they can to make things better. A rangher who the area. I take exception a little bit to the te light in the bottom of Hurro Creek has made 16 fact that it's even considered as a Mild and Scenic 10 excellent efforts in beautilying that area and just 11 River designation hereome most of the year it's just 11 taking care of it. not even a dry weeh. When you talk about the Area So I also, like Bill said, do agree that 12 12 being a beautiful canyon type eres, that's true, but 13 13 the BLM has made some great strides in the I also wonder why it needs the designation. The recommendations that they're making right now and I 14 approciate your efforts for that. And that's all I 15 area is extremely remote. To get into it requires 15 16 hiking and beckpacking, which is already going to be 16 allowed under this designation. It's also protected 17 17 Thank you. under the wilderness eres, or wilderness act in some 19 BEARING OFFICER BAUBE: Thank you, 18 T2-3 spots and I wonder why we need more governmental 19 Mr. McClure. regulation of the area. My concern is that it seems 20 At this time is there anyone also who to be our rights as citizens and public land use 21 21 would like to make a statement tonight? 22 2.2 (No response.) 23 And, as Brian said earlier, when ore we 23 BEARING OFFICER BAUER: All right. What 24 going to start getting some protention for those 2.4 I'm going to do, because we had published our open time from 7:00 until 10:00, rather than adjustming 25 that like to use the land, that have grown up in the 25 _ BARTELT & KRNYON BARTELT & KENYON the meeting right now, I'm going to call a recess. 1 STATE OF ARIZONA I will probably only reopen the mosting unless COUNTY OF MARICONA someone elem comes in who would like to make an otal statement. The BLN people will be available to discuss things with you in the back. So at this BE IT KNOWN that the foregoing bearing was time the meeting is recessed. taken before me, LAURA KOELOWSKI, a Motory Public in and for the County of Maricopa, State of Arizona; (Brief recess taken.) that the proceedings were taken down by me in shorthand and thereafter reduced to computer-sided 10 BEARING OFFICER BAUER: There being no 10 transcription under my direction; that the foregoing other speakers or anyone else wishing to present 11 is a true and correct transcript of all proceedings had upon the taking of said hearing, all done to the 12 information, I do hereby call the meeting adjourned. 12 (Hearing cong) aded at B:30 p.m.) best of my skill and shility. 13 13 14 I FURTHER CONTINUE that I am in no way 14 15 15 related to any of the parties hereto, nor am I in 16 16 any way interested in the outcome hereof. DATED at Phoenix, Arizona, this 24 Km. 17 17 day of ______, 1994. 18 18 2.0 20 21 21 22 22 23 2.3 24 24 25 25 BARTELT & KENYON DARTELT & KENYON



BUREAU OF LAND MANAGEMENT WILD AND SCENIC RIVERS 1994 LBIS SEARING, 1 2 2 commenced at 7:00 p.m. on May 19th, 1994 at Dixle 3 College, Browning Building, Dunford Auditorium, 225 3 IN RE South 700 Best Street, St. George, Utah, before WILD AND SCENIC RIVERS 1974 LEIS BEARING LAURA M. ROSLOWSKI, a Motory Public In and for the County of Maricopa, State of Arizona. 4 ORIGINAL St. George, Utah May 19th 1994 7:00 p.m. 10 10 APPEARANCES; 11 11 12 12 For the Bureau of Land Management: 13 Darry Rever, Hearing Officer Phil Moreland 14 15 15 16 16 17 17 1 4 10 19 19 20 20 21 21 22 22 23 23 Prepared for: BLN (ORIGINAL) Reported by: LAURA M. KORLOWSKI Court Reporter 24 24 25 BARTELT & RENYON BARTELT & KENYON 8t. George, Uta May 19th, 1994 7:00 p.m. Resource Manager in the Area Strip District Office. Our court reporter is Ma. Laura 3 3 Roslowski from the firm of Bartelt & Kenyon Court PROCEEDINGS Apporting in Phoenix, Arizona, BEARING OFFICER BAUER: Good evening, I hope each of you eigned in on the 6 Ladies and Gentlemen. attendance sheet. The attendance sheet allows you This masting will now come to order. 1 to indicate whether you wish to speak tonight or have a few introductory comments to make before I submit written comments. If you didn't sign up as call upon enyone who wants to speak. you came in and you want to speak, raise your hand 10 My name is Larry Bauer. I am the Deputy and we will see to it that you get a chance to sign 11 State pirector for Mineral Resources in the Arizona in. After this introduction, I'll call upon those 11 State Office of the Bureau of Land Management. I 12 who've indicated they wish to speak to present 12 13 have been appointed by the State Director of the 13 14 Burnau of Land Management to conduct this public 14 This public hearing is required by hearing under the authority of the Secretary of the statute. The purpose of this public hearing is to 15 15 receive comments on the draft Arizons wild and 14 16 17 On my right is Mr. Phil Moreland, Chief 17 of the Brench of Planning Environment, Landa and 18 Statement. A transcript of this meeting will be Recreation in our state office. Later, I'll ask him made by the official reporter. Ms. Roslowski. The 19 19 to summerise what we've done so far in this transcript will be reproduced in the final 30 34 legislative Wild and Scenic Rivers BIS process. Legislative Environmental Impact Statement along 21 21 22 Tonight we also have in attendance 22 with the appropriate responses by Bureau of Lend Mr. Ray Matheson, the Associate State Director of 23 Management officials. 23 the Arizone Strip District of the Bureau of Land 24 The fire! wild and Scenic Rivers 24 Management, and Mr. George Cropper, the Strip Legislative Environmental Impact Statement also 25 BANTELT & KENYON BARTELT & KENYON

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might have. Any speaker should be allowed to complete their presentation without interruption. Applause is not necessary.

If we have time, and based on the number of speakers so far signed up. [will open the meeting to general comments after all the indicated speakers are finished.

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NR. MORELAND: Thank you, Larry.

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a data-liad document known as Wild and Scenic River
Assonments completed in September of 1993.

The Wild and Buenic River Assessments document contained an evaluation of each of the 20 rivers BLM districts had identified as sligible in the planning process. Although the assessment was developed primarily for internal use, copies were eant to the Congressional Delegation and several other interested parties.

We used the assessment document as the basis to identify the river study areas for the proposed action elternative in the Environmental Impact Statement. Sowever, each of the river study

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areas has at least two alternatives in the general BIS, and those are the two thicker documents, within the individual study areas. Each one has at least two alternatives, the proposed action and the no action alternative. Some of the individual documents have a third alternative, recommending either the entire river study area or portions of it. The draft LRIS was produced during the fall of '93, spring of '84 and filed with the Environmental Frotection Agency and released for public review and comment on April 8, 1994.

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Finally, I want to talk a little bit about public involvement. We in Aritona atrongly believe in full public involvement. In this case our public involvement process started with the resource management plans and plan amendments. We encouraged the public to identify issues and concerns that needed to be considered in planning. We sent the documents out for public review and comment and revised them accordingly.

when we decided to start preparing this document, we announced our plans in the Federal Register and local papers. In the announcement we maked for public comments. In March and April of last year we had it public accoming meetings held

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throughout the state and St. George, Utah. Over 500 people attended the meetings. By the way, the comments are summarised in Chapter 5 of the statewide summary.

Me also meiled out three issues of our Wild and Scenic River updates to over 1,000 people who have asked to be on our mailing list. These updates have kept people informed of the process and our progress.

Last month we started another important phase of public involvement -- this public hearing is part of it -- the public review and comment process on the draft document. We are very enxious to know what you think about the Mild and Scenic Rivers eliernatives.

Each comment we receive tonight and any other comments we receive in the mail until July 8th will be carefully read and responded to as appropriately. The public comments may result in changes to the document. The comments and responses will be published in the final document. This will be east to the Pecretary of Interior and forwarded to Congress to sid them in making degisions about adding rivers to the National Wild and Scenic Rivers System.

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I'll give it back to you, now, Lerry, but, as he mentioned, I want to remind you, this is a formal public hearing process and isn't a question-and-answer form, so I won't ask if there are any questions at this time, but I will he around, and the other SLM employees will be around, after the meeting if there is something you would like to discuss.

 $\label{eq:continuous} \textbf{MEARING OFFICER BAUER:} \quad \textbf{Thank you,} \\ \textbf{Phil.}$

At the present time I have eight people who have indicated they wish to speak.

I'll call upon John Grossback at this time.

WR. CROESBECK: Wy name is John

Gromsback. I am Assistant Professor of Roomomics at
Southern Utab University. I am providing these
comments on behalf of the Washington County Water

Conservancy District and myself.

One of the most important tenate of economics is that every decision we make creates costs and benefits, both for ourselves and others. Recognizing this, two primary questions related to this potential wild and sensic designation are:

First, are social benefits and costs being estimated

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in an unblased method? And, two, Is the present value of fature benefits greater than the present value of future costs?

Regarding an unbiased estimation of costs and benefits. It is important to recognize the difficulties associated with determining the social benefits and costs associated with public policy. because of a lack of data, and limited public resources to discover these coets and benefits. Because of these difficulties, political processes sometimes create policy based on incomplete equipments of costs. Because of the undersetimation problem, the new policy imposes broad social costs while providing perrow, private or public benefits, which is a clear reduction in accial welfare.

My comments today are focused on the costs associated with the declaion to designate a portion of the Virgin River as wild and scenic. If a designation is imposed that limits future unstream water development in fevor of maintaining a politically-determined rate of Instream flow, the economic costs to Washington County, Utah should be considered to the fullest extent possible.

In a recent study I completed for the

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would be enormous and occur repidly. Even if you

Washington County Water Conservancy District using (sophisticated input-Output model of the economy in Mashington County, I found that the present value of economic losses associated with a 1,500 acre foot reduction is new water diversions from the Virgin River System should be in excess of \$600 million. This figure is conservative, I believe, in that it assumed a potential population growth rate of only four percent, wherein the actual growth rate is closer to nine percent or pore. This figure slac assumes that existing water supplies would be reallocated within Washington County away from agricultural to culinary uses within five years to overcome the loss of new diversions. This means that existing water rights for 1,500 acre fast would through some market mechanism that is not currently

were prohibited at a time when there is no surplus of water in the existing supply, during a drought, for example, then municipalities would be forced to limit new water hook-ups, retion water, or both. Given the growth-oriented economy of Washington County, the human cost associated with this scenario

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could immediately count on offsetting 25 percent of the loss in new water with reallocations internally away from agricultural to culinary uses, over 1,500 construction tobs would be eliminated, which would then take with them more than 1,700 jobs in other

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ameters of the economy. All totaled, the county unemployment rate could rise by more than 13 percentage prints in the first year, until further internal reallocations of water, resources and water conservation schemes could be implemented, or the unemplayed move away.

An additional economic cost sessciated with limiting new water development projects is the lost economic value that reservoirs create due to drought-hadging water supplies and recreational use. The value of drought-hedging is that if sessonal and annual water supply fluctuations can be amouthed out, via a reservoir system, the same exount of water supply can support a higher level of sconomic activity.

In a separate study I completed for the Conservancy District, Quail Creek Reservoir, and its associated State Park, will generate in excess of 324 million for 1994 in Machington County. This

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floure assumes a conservative \$5 expenditure per-person, per-visit for food, snacks, fuel, lodging, etc., and that drought-hedging water, or drought-hadged water, rather, excuse me, only has a value of \$400 per acre foot for the total cost.

In summary, my analysis, and common sense, I believe, reveals that limiting the possibility of future water development upstress of the Virgin River Gorge will pose severe economic onets on Weshington County, Otah, I strongly ancourage all parties related to this issue to moneider the full opportunity costs essociated with this potential designation.

Thank you for your attention. Copies of the studies I mentioned are evailable from the Washington County Water Conservancy District here in St. George.

Thank you.

BEARING OFFICER DAVER: Thank you,

I would now like to call on Mr. Ronald Thompson.

MR. THOMPSON: My name's Monald Thompson, I'm the District Manager of Washington County Conservancy District. And the comments I

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be transferred from agricultural use to culinary use

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19 If 1,500 core feet in new diversions 20 21 22

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make are on behalf of the District and also myself. and Scenic Rivers Act a river segment must meet to The District is desply concerned with determine eligibility for inclusion in the Wild and the sultability determination of the river segments Scenic Rivers System: First, the segment must be T3-5 that do not meet requirements for eligibility. On free-flowing. And, second, the river segment must T3-3 ii occasions we directed comments or questions to have at least one outstandingly remarkable value. either the local, state, or Washington Office of BLM The Virgin River-Arizona Strip segments do not meet regarding the Virgin River Wild and Scenic River the free-flowing or outstandingly remarkable value proposed in the Arizone strip. Most of our comments criteria for eligibility. and questions have been ignored or responded to Section 16(b) (b) of the Wild and Scenic 10 Rivers Act defines free-flowing as follows: 11 We are purplexed by the failure to "Fram-flowing, as applied to any river or a section 12 address upstress water issues and the hasty 12 of a river, masha existing or flowing in a natural dismissed of our concurrs. In addressing potential 13 13 condition without impoundment, diversion, impacts on water rights, the draft briefly states straightening, rip-rapping, or other modification." 14 15 that a designation will not affect existing valid It goes on to indicate that minor diversions that water rights. Such statements demonstrate the 16 16 may be an exception. ignorance of the magnitude of the effects a Wild and 17 The act defines free-flowing in two 18 Scenic River designation could have on present and 18 parts. First, there are those modifications which 19 future water use, water rights and water dependent cannot be on river for it to be characterized as 20 namers. Despite requests for analysis of impacts on 20 free-flowing. And, second, those which are 21 modifications that may be on the river. T3-4 22 ongoing instruct flow evaluations, the draft, Prohibited traits, are absolute and bar 22 without adds-seing the issue, simply states, "This **Z** 3 a river from meeting the free-flowing requirement. issue will not be discussed." 24 24 The prohibited traits listed in the Wild and Scanic There are two requirements in the Wild 25 Rivers Act are: Impoundments, diversions, BARTELT & KENYON BARTELT & KENYON straightening, wip-sapping, or other modifications terms of free-flowing. It is estimated that in several of these We're certainly concerned that in this segments they're in excess of three miles of rip-rap area the draft does clearly seem to ignore these from the river's edge to the adjoining shoulders of provisions, that BLM chooses to legislate themselves I-15. The river segment in many areas has been and ignore the clear indicator of Congress. moved, streightened, and the rock faces are Sections 2. 3 and 4 clearly do not meet evidenced by rook cuts extending hundreds of feet. this requirement. There are eix major I-15 bridges In addition to Sequent 4, there's the T3-6 crossing the river segments. We have several major diversion of the Mesquite, which is a pictures of those, in perhaps our draft, which I substantial structure dry demaging the river, which 10 will give you those. Those ere large bridges, some 11 11 rises several fact above the river, and diverges water in the Mesquite area even though it's in the 17 have pillers extending into the river fluor. The 12 Arisona River. 13 14 the river, ultimately leads the National Park To find Sugments 2, 3, 4 do meet the 15 Service to de-list the Viroin River in the Arlzone 15 definition of free-flowing would render the Wild and 10 strip from its National Rivers Inventory. The 16 Scenic Rivers Act definition meaningless. A 17 17 1.6 modified the river enough to remove it from the other than stated in the Act would be arbitrary, 18 19 inventory. Of all the stretches, the only one that 10 capricious and not be in compliance with the lawcould be construed possibly to meet the free-flowing The second requirement is for 20 20 segment would be the first section of the Otah state 21 22 line to the first Intestate 1-15 bridge. The rest 22 traits, either scenic, recreational, geological, all have substantial impoundments, miles of camented 23 2.3 fish and wildlife, historic, or some other veluecip-raps, straightening, bridges, the noise level while the Act Itself does not define this, certainly 24 24 certainly doesn't meet the intent of the act in the Joint Department of Agriculture and Department BARTELY & RENYON BARTELT & KENYON

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of Interior Regulations and BLM Manual gives some guidelines.

There is no documentation in the reports as to how the required outstandingly remarkable values rank on a comparative basis with similar features within the yeographic region. Mithout some ranking, it's impossible to determine such value.

ror example, if we look at the scenic values on a compare -- there's no comparative besis on which to rank or to analyze or compare these values. What do we compare it to? Does this stretch compare with segments in the Virgin Niver and Xion Park? And how does it compare? On how does it compare with the Colorado River, which is a

There is absolutely no analysis in the dodument that will rank it or allows anyons to analyze the criteria or to determine what the common factors that lead to a scenic criteria is.

The other thing that certainly is absent is whether or not these scenic values are common to other areas of the river within the geographic region. There's no effort in the BIS to determine what are those obstanteristics that are routinely found in rivers of this nation within the geographic

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erea. The analysis is silent in that area.

It is also interesting that the intent in scenic is to have something that is primitive and natural, yet many segments of this not only show considerable changes, such as the freeway changes, but alteration of canyon walls and river corridor.

Another potential area might be the fish and wildlife habitat. The SLK Manual requires the habitat be outstandingly and remarkable. The river must provide exceptionally high quality habitat for anythes indigences to the river.

The river does contain the Woundfind Minnow and Virgin River Chub, and other threatened species, some of which are listed as endangered and threatened species, some of which have been listed as endangered and threatened apacies. Somewer, all sequents in the Arizons section have been classified as poor habitat. The river segment contains the red shiner and other non-native fish species, which compete for food and space within the natural species. In fact, because of the poor quality habitat and the non-native fish, it was deemed paceasary to build a barrier to stop upstream signations, at least in Utab, to prevent the reintroduction — to prevent the non-native fish

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from extending further up the river.

Secondly, the river is also dewatered in significant portions of the Virgin River during the ausmer months. It seems unreasonable to classify it as an outstandingly remarkable fish habitat which pleasify is in an intermittent atream.

Becond might be aquatio. While there's nothing in the Act that particularly defines what aquatic value might qualify as outstandingly and remarkable, we have to assume that it has to be something that would raise it above the status found in other areas. There is simply nothing in the document that allows someons to compare any value or any feature found in this area that would be unique or raise it to a status that would be beyond that found in other streams within the geographic area.

This also interesting that normally you would think this type of river would have visitors that ought to be coming, if it reaches its outstandingly, from large distances, yet there's nothing in the report that indicates anyone travels large distances to see anything that's unique or rare in this particular stretch of the river, or outstandingly reservable.

The Wild and Scenic Mivers act does not

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mention riparion as a value to be considered; however, one might say that it's exmething that should be considered under other similar values. However, full analysis of riperian values in this area certainly shows that all segments of the riparien corridor are actually in the disclimax unnatural successional stage. They are composed mainly of tamarisk, dominated stands, which is not a native plant and dominates much of the shoreline. It greatly reduces stands of native willows, seek, cattails and other species which normally would be found in a river of this type.

This type of vegetation dominated by tamarisk occurs throughout the southwest. There's no vagetation types within the corridor which would qualify as outstandingly remarkable.

Certainly, all riperian corridors
throughout the west and desert areas have wildlife.
There's no indication that anything found within
this riperian corridor reaches any classification
which would be classified as outstandingly compared
to other riperian values found throughout the
geographic exes.

Purthermore, we would submit that the analysis of outstandingly remarkable is inedequate,

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undocumented, and rendering the decision that makes generally is free of impoundments, inaccessible that oritoria simply must be classified as exhittery 2 except by trail, with watersheds and shorelines. It also is suppose to have waters that In addition to the fact that we don't are unpullated. It's interesting, your speivels of believe this river meets the eligibility the unpolluted water was omitted. The Virgin River, T3-8 requirements, certainly there are 10 requirements in especially in Arizona during the summer months, Is the suitability area that cause a great deal of primarily filled with the offluence from the St. concern. While some of these areas are addressed. George Regional Sewer Treatment Plant, Though a many of them are simply breached over without eighlflount source of water into the Virgin River. 10 adequate analysis or analysis which leads the holder 10 it is not an example of the vestiges of primitive to believe the writer simply has a bise and 11 11 America required for wild classification or even T3-10 preconceived decision as to what the outcome would 12 conditionally essentially free of human activity 1.3 required for suitability at any classification 14 The KIB is clearly deficient in its 14 suitability enalysis and it falls to show that 15 15 Further, is the BLM suitability 16 there's been any comparative analysis that would 16 assessment it states the Virgin generally contains 17 allow a weader to determine there was an objective 17 poor water quality as a result of high turbidity and 18 quantified analysis as to suitability requirements. 18 salinity. The water appears muddy for most of the For example, while Segment I is an 19 19 year, to the degree that the substrate is not inclaind primitive area, it is already protected 20 visible. There is a heavy algal growth in pools under the Wild and Scenic Rivers designation -during the winter. Bome tests on river water T3-9 22 under other designations. This proposed segment 22 samples have indicated a high level of facal 23 simply adds nothing to the management ability of 23 coliform bacteria. 24 that river segment and to classify it as wild 24 We don't believe, simply because of 25 certainly leaves one concerned. A wild area river -- the quality of the river and the source of BARTELT & KENYON that water, which is certainly not natural or observer would not find it meating the scenic indigenous to the area, raise it to the level of meeting wild classification. Section 3, which starts at the rest area Segment 2 fails to mest essentially the and goes down through the canyon, again, has same condition. The river carridor -- to meet the essentially the same problem. It's govered by scenic river the river corridor sust, one, be mearly three miles of cemented rip-rap, substantial T3-11 largely primitive and must not show substantial areas where the river corridor has been changed. And evidence of mankind. As I've briefly stated, it's bounded by the intractate 15 either over on one Segment 2 contains an I-15 bridge, four areas of alds or throughout the course. 10 rip-rapped banks, I-15 parallels the river along Section 4 essentially fails to meet 11 equip the condition essentially free from human T3-12 12 also unscreened highway rest area, recreational activity regarding water quality as stated. In 13 facilities, including a home, a campground, pichio 13 addition, it fails to meet the requirements for area, all clearly visible. This segment is not only 14 14 mtudy and designation. accessible by roads, but from exits off the I-th. We are also concerned that in the BIS 15 15 dealing with the interrelationship between the study 16 on much of this segment, the traffic noise is loud 17 and other governmental entities, that the statement тз-13 and constant. 10 16 is incredibly inadequate. The Virgin River's The Wild and Edenic Rivers Act describes primary source of water is not Arizona, but Utah. scenic river areas as "Those rivers or sections of And the headwaters are in Utah and almost all of the 20 21 the rivers that are free from impoundments, with 21 significant watershed which contributes to the flow 22 shorelines or watersheds still largely primitive and of the river. To provide the analysis that ignores 22 shorelines largely undeveloped, but accessible in 2.3 that and the potential impacts of the watershed, the 23 places by road." Seems to me that any analysis of state law of upstream according lies in the face of 24 that act by an unobjective or by an unbice writer, reason and simply should not be sllowed to continue BARTELT & RENYON

In this document without a full and factual expressed about the effects on existing and perfected and unperfected as well as future water In addition in the document, SLM rights. These major issues were not addressed. We discusses that there is an engoing study for ecals think that the englysis in this class sust instream flows, yet there is no legal basis for address the impact not only to perfected water which BLM to assert that nor is there an analysis if rights but to state approved, but unperfected water they were to essent it what it is. And it seems to rights which are held by most of the governmental we certainly that relationship and the entities required to provide water for a growing T3-14 interrelationship between instream flows and the population and economy and the people of this classification of this area as a Wild and Scenic 10 11 River must in fact be included within the document, 11 The cities in Washington County are To fail to disques the inetream water requirements growing repidly. The county grew from 29,000 in 12 12 of this magment in the document and then the 1980 to 47,825 in 1990. It's projected by the Utah 13 13 impacted areas upstream flies in the face of a 14 State Water Plan, the Board of Water Resources, and 15 well-reasoned document and I think makes the 15 the state office of Planning, Economic and 16 document clearly inadequate. 16 Development, the projected population in Washington It's true that some scoping sectings 17 17 County by 2020 will be 147,438 people and by 2040, 10 were hald. It's also interesting that most of the 16 268,000. Growth in the past and future depends on the water from the Virgin River. 19 medative information or concerns regarding 19 eligibility or suitability were largely ignored in 20 20 Anything that restricts and limits the 21 this document. A review of the companie made at ability to mapage and use the water from the river 21 these meetings show there was considerable concern will have pajor aconomic impacts and also impact the 23 about imparts to commercial, agricultural, and development and local practices and customs in this 23 24 residential development. 74 There's also considerable concern 25 Failure to enalyze this seems to me to BARTELY & KENTON BARTELT & RENTON . fly in the face of what is the responsibility of the Ope of these statements cannot be true. Now can the BLM. Bacause BLM owns a large part of Washington wild and Scenic Rivers Act create a federal reserve County, in fact over 80 percent of it, it seems to water right and not affect valid water rights when we it is paramount that that analysis occur and that T3-15 all the water in the river is presently claimed T3-16 under valid perfected and unperfected water rights there he sume understanding as to what action they intend to take to protect the downstream designation or applications? Where will the federally reserved water come from to must the purposes of the Act if of Wild and Scenic Rivers, which is below a vibrant and growing accompay. it does not come from valid, current water rights? We've already -- you already have the Another area the draft fails to discuss, information from Dr. Grosebeck. I won't repeat despite the Water District's request for 10 11 that, but I think it's evident that a designation information, is whether there's a distinction made which potentially could impair the diversion 12 12 between perfected and unperfected water rights. For 13 development of new water in this county will be example, will designation bar holders of valid 13 devastating to the local economy. Seems to me that unperfected water rights from perfecting that right; 14 that is, putting the water to beneficial use, this 15 in a country where the economy is so important, in 15 an area where growth is such a large part of the issue must be disqueerd in the MIS, or the draft 16 16 17 17 m major oversight. The suitability report in the BIS is 10 In the draft 215 it inserts there are no required, we believe, to contain an analysis of the 1.0 impacts on water rights. It ways, "Designation as a 20 20 foreseable potential impacts. The draft states, "An ongoing instream flow study would be completed to wild, Scanic, or Regrestional river would not affect 71 21 existing valid water rights. The Wild and Scenic determine minimum amounts of water to protect 22 T3-17 outstandingly remarkable values. Yet, in the draft 23 Rivers Act creates a federal reserved water right 23 for a quantity of water sufficient to meet the it some on to state. "This issue will not be 24 purposes of the act on designated river sequents." disquesed further." Irenically, the impacts on the 25 BARTELT & EBNYON BASTRLT & RENYOR

potential use of water without a determination of 2 the necessary instreem flow is impossible. This is 2 It is clear that no action alternative one example where the draft not only fails to comply 3 is clearly the only one at this time that makes any with the requirements of the sot procedurally, but sense. It's also clear the document makes no effort also fails to comply substantively in the to analyze upstream impacts and there's been no decision-making process; thus, regdering the effort to involve the State of Utah, the 13 or 14 suitability determinations arbitrary and capricious incorporated cities, the Water District, and other and not in accordance with the law as prescribed by upstream users who are vitally dependent upon the the Administrative Procedure Act. water within Washington County, or an affort to make 1 D One of the major issues raised in the an analysis of the impacts of Virgin River a 10 11 scoping process for this LEIS is the effect on designation would have on Kane County. 11 upstream water rights. These impacts must be I suspect these comments are just as 12 T3-18 recognized, quantified, and parried forward and 1.3 applicable to the Peris Section, which significantly analysed in the document. To state that this 14 impacted on development potential in both Rane and 15 proposal has no effect on water rights and that it Gerfleld County. 16 will not be discussed further is imadequate and We are also concerned so you make this 16 17 arhitrary. 17 analysis that there's no effort to develop a 14 Further, a designation well may 18 criteria, objective criteria of which this analysis seriously impact the ability to manage and protect 19 19 could be compared against. In a recent analysis 20 upstream and downstream endangered species since it 20 done in the Forest Service, as they were looking at 21 certainly entails the management alternatives 21 whether these river segments might meet this available within the segment of the Wild and Scenio 22 classification, they sat down and first looked at 22 23 Rivers area, which today we know is substantially all those characteristics of the river eyetem that 24 infested with nonnetive species which compets in a 24 were expected to be found within the geographic 25 negative way with the present fish community within 25 region. BARTBLT & ERNYOR BARTELT & KENYOW Then they took a river that had some flows. There was no evidence presented that water outstandingly remarkable characteristics that flows are in fact declining in the river, everyone agreed on and compared those. They Ironically, the construction of Quail compared each river and where they found that they Creek Reservoir and outflow from the St. George had traits that were simply common to all the rivers Sowage Treatment Facility provided two things the in the segment, or rivers within the geographic Wild and Scenic Rivers Act would specifically eres, they fell out. There's no effort to compare exclude, they have provided water flows in the river this river and the characteristics with other rivers during periods when It was historically dry. in the vicinity to rank them or determine if they. Construction of additional water storage familities in fact, have any characteristic that's not found in 10 upstream would result in release of controlled flows 10 11 common with other rivers within this geographic 11 to the river and increase flows during the low flow 12 12 periods. Stable or increased flows would be more 13 In addition, we are concerned about the 11 likely to occur under the no action alternative than 14 potential unvironmental consequences. In every 14 the proposed action. 15 instance, with the possible exception of the aquatle 15 This should be rewritten to show there and riparies values, the conclusion of the RIS is 16 16 are no negative environmental consequences from the that ongoing penagement actions would protect the no action alternative. The suitability assessment 17 1.4 velues. states, "There are no known threats to the Virgin 19 Under equatio and riparies it states. 19 River within Arizons.* If they are no known threats due to a continuing decline in water levels or 20 to the river, what's the intended purpose of the quantity, orgoing management actions would not 21 proposal? The inescapable conclusion is that the ТЗ-19 🚦 22 provide adequate protection for these values. There BLM intends to include the Virgin River in the 22 is no documented basis for this conclusion. We 23 Matural Wild and Scenic Rivers study area to prevent actions are listed or proposed in the proposed 74 use, conservation management, and other economic action which would increase or even maintain water development, regardless as to whether or not the 25 SARTELY & RENYON BARTELT & REPTOR

virgin River meets the requirements of the Act. CHIS. Apparently, BLN chose to ignore the The entire section dealing with 2 Ż consultation and coordination lists where there have Joint regulations to exclude those who have to live 3 in this system and live with the consequences of an been verious meatings held. On paper it's an attempt to show the requirements for coordination action dictated from a large capital city out of the region of the state where they don't have to live and consultation have been met. The District hee subsitted comments, requested information on 11 with the consequences of the designation. occesions regarding the effects of Wild and Scenic Neither Weshington County or the water River designation on upstream communities. There is District or communities within this county are no section or indication that the proposal was 10 listed among the agencies to whom a copy would be 10 modified in any way to reflect these comments. A sent. The District is quoted and has provided 11 11 raview of the community received at the ecoping 12 information throughout the process, yet we are not 17 considered an effected party. We believe the EIS 13 meetings show the majority were opposed to the 13 proposals or requested modifications. The purposa completely fails to analyze the impacts on 14 14 T3-20 for which consultation and coordination is required Washington County, even though the major impacts 15 clearly has not been met. 16 from the proposed action are, in fact, in Washington County. The entire process is arbitrary and 17 it is also noted that all preparets for 17 BLE are Bureau personnel. The revised federal 10 18 The criteria given in the Wild and 19 quidelines for eligibility finds a study teem as "A 19 team of professionals from intermeted local, state T3-21 20 21 20 Scenic Rivers Act requiring free-flowing was not and federal agencies invited by the study agency." met. There was no criteria or documentation given 21 There are no local professionals or state on how outstandingly remarkable values would be 22 22 determined. The eligibility and suitability professionals on the team as prescribed by the 23 regulations during the preparation of planning 24 evaluations did not comply with the intent or documents, suitability assessments, and the draft regularments of the Act. BARTELT & KENYOR 40 We believe the analysis is inadequate in and certainly there is no legal mechanism for BLH to evaluating the economic, social and environmental impacts on upstream communities in Dish. Yet, the We are also concerned about statements impact in Utah elone by this designation would be and recent letters from Mr. Rosenkrence who indicates that this section of the river found significant and have major impacts on the local customs and cultures, not only in Otah but Arizona. eligible is now under protective management. We would submit in our draft a way ist memorandum, from The document again states you were working on flow. It seems to me that before this the regional solicitor, indicating that protected T3-22 EIS is completed those studies should be completed management of Wild and Boonic Rivers area without and fully analyzed and discussed within the document specific designations approved by Congress is and to the extent they are essentially for the illegal. We submit that for the record. 11 11 management and greation and use of a Wild and Scenic we are intensaly complexed by the 12 12 Rivers area, must be analyzed as to where the differing directions which we receive from the BLM. 13 13 We have direction from solicitors that there is no water's going to come from and who's going to have interim protection given to these rivers. The state to give it up to meet these downstream interests. 13 15 It seems to me when you fully amply == director in Arizona mays there is fact. We would 16 16 this slong with the brochure, the question is one of like to know who speaks for BLM, what the intended present impacts are upstream, and, in fact, about which we continually say, "Well, what are you really 18 after?" Blw mays, "We are just doing our job." Yet the many things that they have presently in place, 10 1 6 at a recent public discussion we came across one of the legal authority to manage this river segment as 20 20 a Wild and Scenic River without a designation by the purposes is to control or stop upstress water 21 2 1 22 development. Well, there is nothing in the Act that 2 2 Congress tends to give BLM that authority. It seems to me Again, lot me state, we're intensely 2.3 23 concerned about the quality of direction we was certainly a decision to attempt to impact the local 24 24 economy a May inappropriate, arbitrary, capticious coming from the BLM and we are also concerned about BARTELT 4 KENYON BARTELT & KENYON

the lack of quantitative and qualitative analysis in the document, objective oritoria by which we can analyse the basis for which a decision can be reached. Without those areas being perfected, without a thorough analysis upstress on impacts, the final BiB absent those would be incredibly defective. And that the sconosic drive without a full analysis would be a serious sistake and incredibly sieleading to the Secretary of Interior, to the President of this country, and to Congress, as they have to rely upon these document to make

There a document which I'll give you that includes several of the photographs of the river corridor so you can see the significant intrusions that we think clearly go to the eligibility and suitability issues. There are some larger pictures here that Sheridan has been putting up as I talked, but I think as you look at them, and parhaps the public, you'll see if we are looking at a river that's suppose to come to a Hall of Pame atatum in terms of primitive and natural, it's very difficult to see how this 20-plus mile stretch can meet that qualification unless the writer has a second agenda. I submit that they clearly do not in

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this case, and that agends has to be an attempt to take upstream water rights without a full analysis of what those impacts are.

We resent that. We think there should have been a full perticipation by local and state interests within the impact of the area, that that was not done in any analysis. It needs to be completed before this becomes a final document of which people have to read and rely upon.

I would ask that our comments be marked and included in the record. I would also mak the Regional Solicitor, intermountain Region, March 1, 1994 memorandum, be marked and included within the

We appreciate your time and we want you to know we appreciate you doming to 8t. George. We know you didn't have to do that. We think that's an attempt.

One thing I will say, at least with State Director Rosenkrance he has attempted to answer some of our letters, which is much more than I can say for our local BLM, Utah. The ones in Mashington D.C., if you would relay that, at least he has attempted. We don't have adequate responses, but that may be because there was not a full

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understanding of What the potential factors are that are at risk.

Thank you for your time. BEARING OFFICER BAUER: Thank you very

much, Mr. Thompson.

7 would now like to call upon, and
please forgive my pronunciation, Barbara Sjelle.

MS. MUBLIE. I would like to just submit my written comments and not read them and sek you to include them in the record. And Y ll summerize what they are for these purposes tonight.

My name is Barbara Sjelle. And I'm here on behalf of Washington County and on my own behalf.

I think that the concerns that I would like to express tonight have to do with the need to adequately address all of the impacts on Washington County in the Environmental Impact Statement that you will be submitting to Congress. We are concerned and we would like to know that Congress has taken into account all of the considerations that apply as they impact upatream users and Washington County in particular.

We don't agree with some of the conclusions in the draft RIS that indicate or

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minimize the impacts of this designation on the use of water in Utah and on development in Utah. And while it's up to Congress to make those decisions, we think that it should be fairly represented that there will be limitations on those things arising from this designation.

In terms of the actual eligibility of the river, I think that the Water District has amply presented the data which would call into question the eliqibility under the wild portion of the Wild and Scenic Rivere Art. The nutstandingly remerkeble values portion may be a little bit more vague and subject to broader interpretation, but, once again, if that has to be done as it should be done, in comparison to other rivers within the physiographic ragion, then once again we don't think that that has been adequately addressed in the current draft and would like to see a more caraful and more comparative evaluation included.

Without that kind of factual data and without the basis for those decisions being offered in the Environmental Impact itself, it's impossible for those of us of the public and for the public officials who are concerned about these impacts to really know the basis upon which the Bureau is

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making Its decisions. And we balleve it's going to employee. I worked for BLM for over 30 years in a be misleading to Congress if a full spectrum of management position for most of that period of 2 concerns and considerations isn't presented in this I have been recently employed by the So fundamentally we don't think that it Water Conservancy platrict and inventoried the adequately addresses, that it fully outlines all of Virgin River all the way from tion Metions) Park the representions that would come into play, and olear down to Lake Wead. In that inventory I particularly the reprecautions that are going to inventoried everything that was along the river, have impacts on the people who live and work in including the area in Arizona, and photographed Washington County and we would like to see that those areas and have evaluated the draft SIS that 10 corrected in the final Environmental Impact has been presented against the information that I 11 12 gathered in the field. And I find that this Certainly, the officials of Washington document, in my time in the BLM, may be one of the 13 13 County and other local officials, I'm sure, would be more inadequate documents that I have ween. 14 14 If you apply the orlierie required in 15 very willing to take their time to incure that those 15 the Wild and Scenic Rivers Act to the segment of the kinds of considerations are addressed. An 16 16 invitation or any other opportunity would be river in Arizona, by reading the date in the 17 17 welcomed. So with that, I will aubmit my comments. 10 18 suitability report and the draft BIS, there's no way that you could rationally come to the conclusion Thank you. T3-24 SEARING OFFICER BAUER: Thank you, that the river in Arizona fits the criteria for Wild 20 20 and Bossic River to be suitable for designation in 21 21 27 I would now like to call upon Sheridan 22 I quess as I reviewed that document I 23 23 really couldn't believe that you could rationally 24 MR. BAMBEN: I'm Bheriden Semeen. I 24 present the case and show all of the reasons why it live in Cedar City, Utah. I'm a retired BLM 25 25 BARTELT & REDYON DARTELY & REMYON would not fit the criteria and then go right down spent -- I have a degree in range management. I've and say the river is free-flowing, which is done in studied plants and plant communities for my whole 2 both the suitability report as well as the draft career and there are no vegetation communities WIR. And so this goes back a step sheed of the without on the riperian along the river or on the draft mis, but all of the other is moot. If the upland that would be outstandingly remarkable. river doesn't meet those two eligibility In order for these vegetation to be requirements, which Mr. Thompson discussed, then all outstandingly remarkable, they would certainly need of this other, the draft BIS and the things that not to be discliman, deteriorated vegetation from what was originally there, which both the vegetation come after that, are meaningless because the giver T3-25 plainly is not eligible. I don't believe that any 10 on the upland and the riparian on the river geamonable person would arrive at that conclusion. 11 11 currently are. They are dominated by tameriaks If you review the photographs that have along the river and the native epecies have been 12 12 been submitted and the narrative that's been crowded out and they are not allowed to reintroduce 13 13 submitted as well as reading your own document, 14 themselves, nor will they in the future. 1,4 applying it against the criteria, I just don't if you are familiar with the plant of temeriaks, it's sytremely competitive, And once 14 believe you could possibly come to that conclusion 16 established, it's nearly impossible to aliminate. 17 that it is eligible. 17 So there's no management you could do in the future One of the things I would specifically 18 18 like to make some comment on, because I believe I that's going to change those disclimes vegetation 19 19 types to a climax type vegetation which could be have some area of expertise in that, and that hem to 20 30 do with outstandingly remarkable vegetation. It's considered outstandingly remarkable. 21 21 If there were arese that were suitable 22 indicated that there is outstandingly remarkable 22 riparten vegetation and vegetation along a couple of for a rollick area where you could see segments of the atream or the upland within the corridor, that 34 segments, or maybe all of the segments, in Attrons. 74 Now, this is -- again, I'm no biologist. I've you could say were rollick areas that would relate 25 BARTELT & REMYOR BARTELT & KENYON

to climax, had the original vegetation on them, rivers, would have used the same law and applied perhaps they could be considered outstandingly 2 reseonable criteria to them and come out with two remarkable. But even then, they would need to be streams that were eligible. And then in the State more outstandingly remarkable in other eress within of Arizona, you would come out with, I've forgotten the number -- what is it, 207 -- whatever the the region, the metion and the province. It appears that all was done was it said number is, that's a little hard for me to understand that the riparian vegetation elong the river was by applying the same criteria what I know about more outstandingly remarkable than the upland, dry of the streams, the Provo River, the Local River. uplands. Now, this obviously down't meet the some of those type streams did not qualify. intent of the Act and is completely arbitrary in my 10 The alternatives in the draft document I 11 11 believe are ludiorous. I can't believe that you T3-27 12 It's been discussed about outstandingly could throw all 20 streams together and may they are 13 remarkable, but I guess perhaps this is where, all eligible or they're all not eligible or they are 13 again, I found the document perhaps the most 14 ell continued under the current management or there 15 lacking. These are ecmewhat -- they're not defined 15 would be no change. There's no attempt to equate what the definition of outstandingly remarkable is. one with the other, they're all three together in a T3-26 but I believe that it's clear that outstandingly 17 pot, they are either all eligible or they are not remarkable means that these are values that are much eligible. And enelysed in that menner, I think it's 78 19 more valuable than just on a local level, but they entirely inadequate. 19 20 would be outstandingly reservable on a regional and It has been pointed out that there's, of 21 national basis compared to similar other types of 21 course, no action of the upstream impacts. And as a rivers. This definitely was not done. I could find 22 22 former BLM employee, I would fust like to make a 23 no Indication that this was compared to others. 23 point as to what would happen if a segment of the And it is a little interseting to se 24 24 river would be designated down in Arisons, what it that the Cache National Porest, with all of these 25 could do to Utah. Most of the land, as has been BARTELT & RENYOR BARTELT & KENYON pointed out, in Washington County is federal land that need. It simply talks that a sufficient amount 2 controlled by Forest Service, BLM, or Park Service. of water would be reserved to meet the intent of the Any time that it was necessary to construct or Act. There is no way to know how much water that is desire to construct a reservoir, a canal, a pipeline and so it was completely out of place. Before you or any such thing that would require a right-of-way, could do an Environmental Impact Statement, you even if that was to be on private land and it would need to determine the required instream flows required a right-of-way across the public land, BLM and enalyse that in the document. If you don't do lands, the fact that it eight affect the downstream that, the document I believe is entirely inadequate flow in a Wild and Scenic River designation in T3-29 and doesn't in any way analyze the impacts of the 10 Arizona, designated by the BLM in Arizona, the BLM decision of a designation of Wild and Scenio 11 would reject that right-of-way. That's not 1.1 Rivers. 12 farfatched. As being part of the agency, I've seen I believe all of the other items have 12 13 that done many times. And so does it have an effect been covered. I appreciate the opportunity to talk 13 14 on Washington County even though it's in Arisone? to you this evening. And I simparaly hope, as a You bet. You bet. Where it's public land, that 15 15 former RLW employee, that the BLW can do a better 16 will he used to stop development in Washington 16 tob in analyzing these comments and developing some 17 17 The other thing that I would just like 16 fit the intent of the law as epelled out that we λΨ 19 should be applying to the criterion in developing I want to emphasis again because I belleve It's so this draft document. 20 T3-28 21 important, that's instream flow. I can see the Thank you. 21 document is totally inadequate. There is no way you BEARING OFFICER BAUER: Thank you, could analyse the effect of the designation of a 23 23 Mr. densen. Wild and Scenic Biver designation without boowing I'd new like to call on Morgan Jensen. 24 how much water you're talking about needing to meat MR. JENSEN: Thank you, Mr. Bauer. BARTELT 4 KENYON

.53. rights simply reflects a misunderstanding, or lack appreciation for you coming to St. George. I of understanding, of the difference between 3 realize there are some places that you probably appropriated and unappropriated water rights. would rather be tonight. Appropriated water rights mean they have My name is Morgan Jensen. I live in been perfected. I misstated that. It's perfected Toquarville, Utah. The comments I make are my own and unperfected rather than appropriated. But, and they relate to the Virgin River section of the anyway, perfected water rights mean that they are Arizona Wild and Scenic Rivers Legislative KIB. being diverted, they are being put on agricultural Most of the comments I prepared have ereas or they are being diverted to a city or already been covered by Mr. Thompson, Mr. Bensen, =0 ecmething, they are being used, they are simply not I'll tunt briefly summerize two that I think are 11 11 floating in a river. very important. One would be the lack of explicit 12 12 An unperfected right is one that is comparisons to evaluate the relative significance of recognized by law in Utah, but has not been 13 13 similar areas. The lack of this comparison really perfected. The water may still be and still is makes the BLE's ability to make a decision and the floating in the river. These rights are valid. 15 15 T3-30 public's ability to understand the decision They may have fairly early priority dates, some of 16 16 completely void. The very words outstandingly 17 them would be 1940's when the old Dixie project was remarkable ory for a comparison against something, proposed. These are primarily held by the water districts and municipalities. And they are the some kind of criteria, and that is lacking. 19 19 28 20 besis for which these communities can continue to important, and it's been hammered on, I realise, was 21 the failure to address opstream water right 22 22 rights and the ability to divert them, they couldn't 23 questions. The simple dismissal of this question as 23 he -- growth could not be sustained. having no effect and the statement that BLM water 24 Also, the study failed to, you know, it 24 rights would be junior to all other recognized water recognized and talks about the fact that there is an BARTELT & KENYON BARTRLT & RENYON ongoing instrees study. And it's putting the horse before the next not to do the instream flow. If you MS. WILSON: My name's Michalle wilson. I'm speaking for myself. And although don't know what these outstandingly remarkables are that is regulied for water, it's impossible to probably most of my comments have already been evaluate the affects. There's very little water produced within the Arizona section of the river. like to reiterate and add a few comments. The water, if there is any, has to come out in Otah, For two augments I have been working so you can't say there will not be an effect on specifically on the wild and Scenic Rivers Act and T3-31 upstream water rights it seems to us. And there more specifically on the procedural requirements of will be an effect and it could be substantial. the Wild and Ecenic Rivers Act. And those issues I stated to begin with that I, I was 11 11 have been raised, but what concerns me most 12 procedurally, first of all, is that the Virgin 12 a cursory review of the rest of the EIS and I 13 sequent does not most the eligibility requirements, 14 believe that the comments that I have made and that first, of free-flowing, second, heing of an T3-32 others have made are equally valid to other segments 15 outstandingly remarkable value. These requirements 13 16 that are considered in the SIB. And the entire eren't either or, they have to have both. I think 16 process and the way that upstress water rights were 17 17 it's clearly indicated by the pictures and treated and the lack of explicit comparisons should 18 Mr. Thompson and other comments, we have shown that be a part of each segment that's considered. the Virgin River segment is not free-flowing and is 19 14 Again, I thank you for this opportunity lacking in the outstandingly remarkable Values. 30 20 to comment and appreciate your being here in #t. I just found -- I had an opportunity to George here tonight. Thank you. 22 look at a couple of other studies on different BRARING OFFICER BAUER: Thank you, rivers and impediately when I looked into the 23 23 24 24 Arizona strip, I was Yunning into problems right I would now like to call upon Michalla away. It starts with alighbility. The problems BARTELT & KENYON

just compound with suitability. There are several wilman. 1 тз-33 і requirements in suitability. In fact, I found ten I would now like to call upon Rick of them. Most of them are mentioned in the Act. A+1-1 some are mentioned in the BLM penuel, a few are MR. ARIAL: Thank you very much for mentioned in the Joint Guidelines which are not being here with us tonight in Washington County. cited for some reason in the draft. But of those I'll be making a statement tonight for Congresses ten, a few of them are touched on, but not all ten James B. Sassen, who is the Congressman for the are delved into like they should be. rirst District of Utah. I'll be commenting on the I think procedurally the Act requires Wild and Scenic Rivers designation on the Virgin extensive documentation and there is a lack of River segment in Arizona. 10 10 that. Some of the comments that you've received 11 The actions of the Bureau of Land 31 will point out the lack of following the Management to bogin the designation of Wild and 12 12 step-by-step procees in the suitability report. And Scenic River boundaries causes ne great concern. 13 13 T3-34 that because it's done in the R&D process and also Although, many would have you believe that a In the draft twis, it needs to be included in 15 15 designation would have little, if any, effect on 16 16 water rights, economy of the area, and private property rights, I would contend that it should be I think everything else that I intended 17 17 to may have been said, so I won't take any more of 18 looked at with greater intensity. 16 your time, but I would like to may that the issue 19 19 Any process to designate wild and Scanic here is not so much what alternative to choose or River boundaries must consider the economy of the 20 20 what to comment on, but rather the adequacy of the area. with limited developmental land in Southern 21 21 draft and if there needs to be a resvaluation on the Utah, the impact on the economy by designation may 22 22 river segments that it enalyzes. 2.3 prove to be great. Before we begin formally 24 Thank you. 74 duniquating one acre of river, the impact on the BEARING OFFICER SAUER: Thank you, Ma. economy of the area needs to be given proper 25 25 BARTELT & KENYON BARTELT & KENYON In the St. Croix case, extremists got consideration. 1 The 1968 wild and Scaule Rivers Act legislation introduced in Congress which never passed, fortunately, to remove the 50 percent from specifies that Wild and Scenic River boundaries the original act designating the viver as wild and should be about a quarter of a mile from the high scenic. Defined under the Act is the right to water mark on each bank. Wild & Scenic River autivists often was the word corridor as a resson to control the use of land within the suthorized establish buffer zones and as a basis to file houndaries of a component of the wild and Scenic T3-35 Rivers System for the purpose of protecting the levenite to stop multiple use along the river. For natural qualities of a designated river. The threat example, after the passage of the 1988 Gragon Wild of a land owner being condemned through a scenic and Scanic River bill, much more commercial timber 10 was put off limits to loggers than the Forest 11 easement anywhere within the river corridor is the, 11 quote, unquote, "heamer" that forces most people to 17 Service had estimated because extremists claimed 12 conform to agency demands without going through a that some timber outside the corridor harmed the 33 13 forme) condemnation of the city. river's watershed. 14 Impact designation on recreational use The Act sets a limit on acquisition of 15 of the river must also be looked at very pleasily. private land by an average of 100 acres par river 16 16 mile. However, there are no limits on easement 17 Although hunting and fishing are permitted under the 17 1960 act, federal agancies often systematically use purchases. On the St. Croix River in Minnesote, the 16 T3-36 National Perk Service used a threat of owner's the Act to close roads along designated rivers. As a result, the practical effect of the Act has been 2.0 easement as a way to create instant, quote, unquote 20 substantially to reduce represtional access. "willing methers". Although private property, or 21 21 For this reason, many sportsmen's groups land in few, wannot be condemned in 50 percent or 22 22 have already testified in the past equinet bills to 23 more of the corridors in public ownership, scenic 23 designate Wild and Scenic Rivers. My concern is sessments can be acquired through condemnation in 24 24 that several latters addressing questions and these cases. BARTELT & RENYON BARTELT & RENYON

concerns of the Machington County Water Conservancy District have been eent to the BLM. These letters and the questions that romain have gone unanewszed. Our conclusion from this action was that the BLM has no intention of dealing with local concerns until it's too late in the process to make a difference in the outcome of the decision in the final EIG.

It is my desire that we take into careful account the concerns voiced by the local people rather than impose an arbitrary decision upon the crucial water resources of this area.

Thank you very much for your time. HEARING OFFICER BAUER: Thank you,

Mr. Aerial.

I would now like to call upon Lola

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MS. 589Lib. As you said, my name is Lolls Esplin. I'm a concerned housewife from St. George, Stah.

I'll begin my presentation tonight with federal government rights. The U.S. Department of Interior, Burman of Land Management, Wild and Scenic Rivers Degislation, Environmental Impact Statement, otherwise known as the LEIS.

Our Utah state representative, Met

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Johnson, says that the rederal government is usurping states' rights over water and land issues. The federal government's claims to any veter even in wilderness claims are phony. If we, the people, allow this usurpation to happen, then private land owners on the river will find themselves entwined in numerous, often contradictory regulations. Even cattle drives will be permissible as long as cattle do not adversely impact the outstandingly remarkable values — we've heard that, haven't we — identified in that particular river segment. Who will be the Judge of an adverse impact and these three words above, outstandingly remarkable values, identified as given above.

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Also, federal agencies will issue different sets of requiations from the states. The resulting economic problems will pit environmentalists against residents. Environmental coalitions will quickly file nuisance leasuits with their new found ways to frustrate productive citizens. Productive citizens will become victims of ongoing river and lend grabs.

The federal government will out off access to private land by their rwhee and regulations. The federal government will hold

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condemnation authority on viver frontage, one guarter of a mile from either bank. The federal government will allow no impoundments, quute, unquote, or reservoirs to be built with water control. Also, private property rights and instrugation will all be threatened.

Then I have some questions that i'll ask at the end, as I mentioned.

Now, you'll notice that I've prepared my talk in the whape of an upside down pyramid. This is what we have now with our government the way it is, it occupies the great big upper part of the upside down. Down at the bottom we have the states' rights, state and local government, who will frequently be at odds if this passes.

bown at the very point we have the local county rights where all the productive citizens are located.

At this point I think I will turn around and talk to the ditizens in the audience instead of the government. Because this is the way I'd like to see my pyramid as a citizen of this United States, is in this shape, the way it was prepared when our Constitution was first gratified. Our Constitution was ratified September the 17, 1787. Our Bill of

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Rights whe retified December the 15th, 1791. And then under -- that represents the federal rights, the tip of the pyramid. And then the state's rights are down below that. The water serenity rights are moved in the state by irrigation companies, domnutities and water conservancy districts. The state owns the water, not the federal government.

Representative Charles Duke of Colorada
State Bouse of Representatives believes that it is
time for the states and the people to exercise their
powers and retain rights to curtail and reverse a
long train of usurpations of power by the federal
government in Mashington.

Instead of complaining shout unfunded federal mandates, Representative Duke Is challenging the constitutionality of the mandates. He spunsored BJ Resolution 941035, which passed in the Colorado House April the 7th of this year, and it passed in the annate of Colorado April 21st of this year. Both of them passed by Jop sided votes.

Representative Duke said it won't be many for the Mashington gang to ignore Colorado when we begin passing logislation to put teeth in the year-olution and when dozens of more states follow suit. So what we need to do, citizens of this

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marvalous county, with the pyramid this way, with our rights at the bottom, the government's rights at the top instead of the backwards way I started, is to request our state representatives, Met Johnson and Bill Bickman, and our Senator, Dave Watson, to support this bill, support a bill for states' cights in the next legislature when they meet in Utah. And I thank you for your time,

audience. There's one more thing, though, I went to read to you from our Constitution where Representative Duke is taking his authority, it's Appendment 10. "The power's not delegated to the United States by the Constitution nor prohibited by it to the states. Our reserve to the states respectively are to the people. Let us not let the government usurp rights that are not theirs."

Thank you.

BEARING OFFICER BAUER: Thank you, Me.

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Is there anyone else who would like to make a statement tonight? I'm going to recess the hearing, because we still have some time where people might want to make statements. I'm going to recess the hearing. Phil will be available to talk with you. And then at such time when it is

absolutely apparent that nobody size would like to make a statement, I will call the hearing back into session and adjourn it. But at this time, I'm going to recess the hearing and people can go to the bathroom and talk to Phil, the maps are at the back of the hall. Bo this hearing is now recessed.

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(Brief recess taken.)

BRARING OFFICER BAUER: There being no other epeakers or anyone else wishing to present information, I do heraby call the meeting adjourned.

> - - -(Bearing adjourned.)

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STATE OF ARIZONA COUNTY OF MARICOPA)

BE IT KNOWN that the foregoing hearing was taken before me, LAURA KOZLOWSKI, a Notary Public In and for the County of Maricops, State of Asisons; that the heering was taken down by me in shorthand and thereefter reduced to computer-mided transcription under my direction; that the foregoing is a true and correct transcript of all proceedings had upon the taking of sald hearing all done to the best of my skill and ability.

I FURTHER CERTIFY that I am is go way related to any of the parties hereto, nor am I in any way interested in the outcome becamf.

DATED at Phoenix, Arizona, this June M Hoforshi

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MARKINGTON COUPTY WATER COMMERCANCY DISTRICT COMMENTS OR DEAFT ENVIRONMENTAL INDUCT STATEMENT WILD AND MCSMIC RIVERS FOR ARISONA

MAY 15, 1984

The following comments are in response to the BLM's Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement deted April, 1994 (hereinafter, "Draft LEIS"). The Washington County Water Conservancy District is deeply concerned with the suitability determination of river asymmetr that do not meet the requirements for eligibility. On m) over occasions we directed comments and questions to either the loca), state, or Washington Office BLM, regarding the Virgin River Wild and Scenic River proposel in the Arizona Strip. Most of our comments and questions have been ignored or responded to inadequately.

We are perplexed by the failure to address upstress water issues and the hasty dismissal of our concerns in the Draft. In addressing potential impacts on water rights, the Draft briefly states that a designation will not affect existing valid water rights. Department of Interior, BLM, Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement, p. 23 (April 1994). Such statements demonstrate the ignorance of the magnitude of the effects a wild and scenic river designation could have on present and future water use, water rights and water dependent users. Despite requests for analysis of impacts on upstream water use and for information regarding BLW's ongoing instream flow evaluations, the Draft, without

addressing the issue, simply states, "this issue will not be discussed Further." Id.

The eligibility and suitability of a river segment directly affects whether a river segment can be considered for inclusion into the Mational Mild and Scenic Rivers system. Pursuant to Arizona State Director Rosenkrance's recommendation, we again raise our concerns with the analysis in the uraft Lgis, including the eligibility evaluation of the Virgin River-Arizona Strip segment (Sea: Letter from Lester K. Rosenkranca, BLM Arizona State Director, to Ron Thompson, Mashington County Mater District Manager, dated April 20, 1994, attached hermin).

BLIGIBILITY

There are two requirements in the MERA a river megment must mest to determine eligibility for inclusion in the MMSRS: first, the river segment must be "free-flowing" and second, the river megment must have at least one "dutatandingly reservable value". The Virgin River-Arizona Strip segments do not meet the "free flowing" or "outstandingly reservable value" criteria for

Free-flowing Requirement

The Wild & Scenic Rivers Act (MSRA) Sec. 16(b) defines free-flowing as follows:

"Free-flowing", as applied to any river or a saction of a river, means existing or flowing in nature) condition without lappundment, diversion, straightening, ric-rapping, or other sodification at the meterpay. The existence, however, of low dams, diversion works, and other winder structures at the time any river is proposed for inclusion in the

national wild and musnic clower mystem shall not automatically bar its consideration for such inclusion: Provided, that this whall not be construed to authorize, intend, or ancourage future construction of such attractures within components of the national wild and scenic river system.

The act defines "free-flowing" in two parts. First, there are those modifications which cannot be on a river for it to be characterized as "free-flowing" (prohibited traits). Second, there are those modifications which may be on a river, and still be characterized as "free-flowing" (discretionary traits).

Prohibited traits, are absolute and har a river from meeting the "free-flowing" requirement. The prohibited traits listed in the MSRA are: impoundments, diversions, straightening, riprapping, or other modification of the waterway.

Discretionary traits may exist on a river found to be freeflowing and they include: low dame, minor diversion works and other minor structures. The Act explicitly excludes impoundments, rip-rapping, straightening, and modification of the waterway from the list of discretionary traits. Furthermore, the discretionary traits are limited only to minor structures such as low dame and minor diversion works. The plain language of the WSFAR automatically eliminates any river segment with impoundments, rip-rapping, straightening, or modification of the waterway from "moligibility" status.

The Virgin River does not meet the fram-flowing requirement in proposed segments 7, 3, and 4. There are mix major 7-15 bridges crossing the Virgin River segments (for examples Sem:

Appendix A et 4, 8, 10, 12 4 19). These are large bridges, some with pillars extending into the river floor. The Interstate highway within and crossing the corridor of the river, ultimately lead the National Park Service to de-list the Virgin River in the Arizons Strip from its National Rivers Inventory. "The Meastern Region felt that construction of Interstate 15 modified the river anough to remove it from the inventory." BLM, Arizons Potential Wild and Scanic River Suitability Assessment, p.11 (September, 1993). Additionally, these river sequents have extensive riprapping, streightening, and a major diversion.

Sequent 1

This 2.9 mile segment, from the Utah State line to the first I-15 bridge, is the only segment which can resembly meet the definition of "free-flowing."

Sagmant 2

This 7.3 wile ampeant runs from the first I-15 bridge to the Virgin River Recreation Area. There are four rip-rapped and concrete grouted river banks, and a large I-15 bridge (§na: Appendix A at 4, 5, & 6). Interstate 15 parallels most of the river corridor. This segment has been proposed as a scanic river, but does not neet the free-flowing requirement for slightlity.

Sequent 5

This 7.4 mile segment, runs from the Virgin River Recreation Area to the mouth of the Virgin River Gorga. Segment 3, exemplifies the grows misapplication of the "free-flowing" criteris. Four major 7-15 bridges cross this river asgment (Sami Appendix A at 8 & 10). One of the bridges is built over and follows the river, with its pillare extending into the river bed (Sami Appendix A at 9). It has an estimated three miles of riprap from the rivers adge to the top of the fills adjacent to I-15 (Sami Appendix A at 10, 11 & 12). The river segment has been moved and the channel straightened extensively, avidenced by measive cuts up the rock face of more than a hundred feet (Sami Appendix A at 13, 14 & 15).

Segment 4

Segment 4 is the longest Virgin River segment at 16.9 miles. It runs from the mouth of the Virgin River Gorge to the Neveda-Aritona stateline hear Mesquita, Mevada. The Mesquita Diversion completely crosses the river channel in segment 4 (258: Appendix A at 22 4 23). This is not a minor attructure, rether it is a large concrete structure with headquies and a cenal to its side. The diversion raises the river lawel several feet and diverte 12.6 ofs of water. Furthermore, there is a major I-15 bridge that extends across the river channel, with its pillars embedded in the river banks (588: Appendix A at 19).

With a major diversion, considerable channel changes, straightening, extensive rip-rapping, and six major freeway bridges, four of the five prohibited traits, exist on segments 2, 3, and 4. It is impossible to dismiss these as minor structures and alterations to the river. Any one of these prohibited traits would disqualify the river magment froe consideration.

Since river segments 2, 3, and 4 do not meet the "freeflowing" requirement for eligibility, they therefore mannot be considered further as to suitability for designation. To find, Virgin River segments 2, 3, and 4 "free-flowing" would render the MSRA's definition meaningless. A determination of "free-flowing" based on some criteris other than stated in the MSRA, would be exhibitery and capticious and not be in compliance with the law. Administrative Procedure Act, 5 U.S.C.A. 5700.

outstanding hemarkable Value Requirement

The memond eligibility requirement for inclusion in the Netional wild and Scenic River System is that the land adjacent to the river possess at least one outstandingly remarkable scenic, recreational, geological, fish and vildlife, historic or other similar value. The Act Item!f does not define what acanic, recreational, geological, fish and wildlife, historic, or other similar values are, however the requisitions found in the SIX Nanual and Joint Department of Agriculture and Department of Interior Regulations establish the quidelines.

The cutstandingly remarkable values, described in the Draft LEIS, are: ecenic, fish and widdlife habitat, aquatlo, and riperien values. No documentation is available in reports or the Draft LEIS as to how the required outstandingly remarkable values rank on a comparative besis with similar features within the physiographic province or region. Without such a ranking it is impossible to determine such values. Furthermore, all the values described in the Draft LEIS fail to provide an objective analysis

or standard by which any of the "outstanding remerkable" values may be determined.

meable - "Scenic value must be ranked on a comparative besis with wimilar features within the physiographic province." BLM Visual Resource Inventory Manual Nestoral Provinces, to meet the outstandingly remarkable requirement, "the landscape elements of landscape, vegetation, water, color, and related factors must result in notable or examplary visual features and/or attractions within the geographic region... (the scenic values found on the river angeants built) not be common to other rivers in the geographic region." BLM Manual, 58351(-31)(C)(1).

The scenic values in segments 1, 2 and 3 are described in the Draft LEIS, as outstandingly remarkable. Moment, there is no objective data presented to show that the scenery is outstandingly remarkable. There is no analysis or documentation comparing the Virgin River to other rivers in the geographic region. What is the criteria used to determine this value? The suchery in all aegments is not primitive or natural. The I-18 highway runs completely through and is adjacent to the river ampents. There is considerable alteration of the canyon walls and river corridor throughout these aegments and yet they are classified as scenic.

Fish and Wildlife Habitat - The SLM Manual requirem that for the habitat to be outstandingly remarkable the river must provide "exceptionally high quality habitat for fish species indigenous to the region."

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The river contains the Moundfin Minnow and Virgin River Chub, which are respectively listed as andangered and threatened species. However, all river asgessts are poor habitat for them. The river segments contain the red whiner and other non-native fish species, which compate for food and space with the natural species. Because of the poor habitat quality, it was deemed advisable to build a fish berrier upstream in Utah to prevent the migration and re-introduction or non-native fish from Arizons and Mayada (See: According A at 2).

whe river is dewatered in portions of the Arizona Virgin River Gorge in the summer months. It is unreasonable to chemnify fish habitat as outstandingly remarkable in an intermittent

The Draft LEIS is inadequate in that it fails to provide what the river was compared to in order to conclude that the fish and wildlife habitat are outstandingly remarkable. It is clear that the procedure used to determine outstandingly remarkable is undomusented, and inadequate, rendering the decision arbitrary and capricloss. Administrative Procedure Act 5 U.S.C.A. 5708.

The Virgin River segments in Arizona do not meet either the free-flowing or the outstandingly remarkable requirement for eligibility. The Virgin River should be deleted from evaluation/ ETS process and not considered further.

Aquatic - The MSRA does not specifically mention aquatic values as an outstandingly remarkable characteristic, however it may fell under the detegory of "other missies values." According to the BLM Manuel, while no epecific evaluation quidelines have been developed for the "other similar values" category, additional values dessed relevant to the eligibility of the river segment abould be considered in a manner consistent with the quidance given for those characteristics specifically mentioned. Examples of quidance given for the anumerated values include: documenting the values in comparison to those within the geographic region, finding the values to be a phenomenon, rare, unique and not common to other rivers in the region, and finding that visitors are willing to travel long distances to appreciate these values. Incredibly, the braft LEIS fails to mention what equally elements of the virgin River magnetics, or by those values are outstandingly reservable. Such an omission violates the procedural requirements of mighibility prescribed in the BLM Manuel.

Riperian - The MSRA does not mantion riperian as a value to be considered, however if it falls under the category of "other aimilar values," there are quidelines which the Draft LETS must heat. According to the BLM Namual, while no specific evaluation quidelines have been developed for the "other similar values" category, additional values deemed relevant to the slighbility of the river segment should be considered in a manner consistent with the quidance given for the enumerated values. Examples of quidance given for the enumerated values theliads documenting the values in comparison to those within the geographic region, finding the values to be a phenomenon, rare, unlique and not

common to other rivers in the region, and finding that visitors are willing to travel long distances to appreciate these values. Nowhers in the proft phis are riparien values analysed in such terms, rather even by the Draft and the Suitability assessment's own findings, the riparien values are common to all river segments in the region, the values described are not even remotely stated in outstandingly remorkable terms.

The river corridor riperion vegetation in all segments are in a disclimax unnatural successional stage. They are composed mainly of tamariek (Salt Coder) dominated stands. Tamariek is a non-native plant which dominates the shoreline riparies vegetation. It greatly reduces stands of native willows, set, bulrushes, cettails with its understory of grasses, sedges, and rushee. There is nothing outstandingly remarkable about the riperian vegetation. This type of riperian vegetation dominated by tamorisk occurs throughout the Bouthwest. There are no vegetative types within the corridor which would qualify as outstandingly remarkable.

Riparian areas in the West all have more wildlife around them than surrounding desert ereas. Riperian areas are valuable in all desert areas. For an outstandingly remarkable classification, it must be shown that the riparian values are outstandingly remarkable in comparison to other riparian areas in the region. Merely stating that it is different than upland vegetation types does not pake it outstandingly remarkable. If it is outstandingly remarkable, the Draft LEIS fails to disclose

the criteria used to permit a reasonable evaluation by those interested and involved in the process. The Arizona Gase and Fish Department, in the Arizone River Assessment, classified the habitat on the Virgin River segments as "common." MLM, Arizona strip, Virgin River, Arizona Potential Wild and Scenic River Suitability Assessment, p. 6 (September, 1993). The riphrien vegetation in all of the segments is common and not outstandingly remarkable. Furthermore, the procedure used to determine outstandingly remerkable is insdequate, and undocumented rendering the decision arbitrary and capticious.

SUITABILITY

In September, 1993 the BLM issued a Suitability Assessment report stating, that it "[did] not constitute the finel suitability determination of the agency." BLM Arisona Strip District, Shivelts Resource Area, Arisona Potential Wild and Scenic River Suitability Assessment, p. 1 (September 1993). This statement implied that an opportunity to provide additional comments would be made prior to a final auttability determination. However, this was not the case, and as a result the Virgin River was found suitable for further studies, without further input.

The Wild and Scenic Rivers Act, Joint Regulations, and the MEM Manual all require extensive documentation. According to the WERK, mis Manual and Joint Regulations the muitability reports are required to document and show:

- The eres included within the report. The characteristics which do of do not make the area a worthy addition to the system. The current status of land ownership and use in the 1)
- 4)
- 5)
- administration of the river amount inclusion in the MNSEs.
 The Federal, public, state, tribal, local, or other interests in designation or non-designation of the river, including the costs thereof, may be shared by State, local, or other spendia and individuals. The setimated cost to the United States of acquiring necessary lands and interest in land and of administering the area, should it be added to the ٥)
- 7)
- system. Ability of the agency to manage and/or protect the river area or segment as a MSE river, or other mechanisms (existing and potential) to protect identified values other than MSE designation. To provide for decision making and to actify the requirement of MEPA, study reports will include an analysis or alternatives.

 Nistorical or existing rights which could be adversely efforced. 61
- 91
- 10)

The Draft LETS inadequately addresses, if at all, those ten issues. For example, rather than explore the characteristics which do or do not make an area worthy for addition, the Draft recognizes only those characteristics which do make an area worthy for addition to the NWSRS. See: Draft LEIS, p. 11 (April, 1994). Restating the requirements to be so blatantly one-sided is a violation of BLM's own regulations, as well as arbitrary and capricious by the standards set forth in the Administrative Procedure Act 5 U.S.C.A. 5706. This type of perrow vision is menifest throughout the aultability determination with statements

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such as "These issues are noted, but will not be addressed" and "This issue will not be discussed further." Such statements frustrate the process and destroy the spirit of cooperation and coordination.

Since the Virgin River segments do not meet eligibility requirements, determining the suitability of these segments is a most point. The Draft LEIS is clearly deficient in its suitability analysis and documentation however, to show the inadequacy of the Virgin River Segment the following is an analysis of the muitability criteria used in the Draft LEIS (River Appendix, Volume 2):

Seneral becomintion of the study bree

The esobent descriptions in this section of the Draft are inaccurate and leave out information not favorable for designation.

Segment 1, is an isolated primitive area as shown by its inclusion in the Beaver Dam Wilderness Area, and is already protected by other mechanisms other than a WSR designation. This segment is proposed as a wild river. The WSRA describes "wild river areas" as follows:

Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds and shorelinas assentially primitive and waters unpolluted. These represent the westigas of primitive America.

Wild & Scanic Rivers Act, 16 U.S.C.A. \$1273(b)(1).

The reasons cited in the Draft for designating segment 1 as "wild" are: the ares is free of impoundments, inaccessible except

by trail, and has essentially primitive shorelines. Curiously, the requirement for "waters unpolluted" was omitted. The Virgin River flowing into Arizons, aspecially during the xummer months, is primarily the affluence of the St. deorge magional Sewer Treatment Facility (gaz: Appendix A at 1 s 2). Though a significant mource of water into the Virgin River, it is not an amample of the "vestiges of primitive America" required for a "wild" classification or even a condition essentially free of human activity, required for suitability at any ulassification level. 16 U.S.C.A \$1273(b) (1890). The SLK Suitability Amamamment regarding water quality of the Virgin River Segment states)

The Virgin generally contains poor water quality as a result of high turbidity and salinity. The water appears muddy for most of the year, to the degree that the substrate is not visible. There is heavy sload growth in pools during periods of low water. Some tests on river water emples have indicated a high level of recal colifors betteria.

BLM Arizona Strip District, Shrwite Hemoures Area, Arizona Priential Mid and Scenic River Suitability Assessment, p. 7 (September 1993).

Segment 1 is ineligible for inclusion into the RMSRS, because the river segment fails to mest eligibility and suitability requirements. Furthermore, the procedural discrepancies, innedeques analysis and documentation along with a blatant disregard for the plain requirements of the NSRA, result in a defective Draft LEIS.

Segment 2

Segment 2 fails to meet a "condition essentially free from human activity" regarding water quality, as cited above.

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Additionally, segment 2 fails to meet the requirements established by the Joint Department of Interior and Department of Agriculture, Final Revised Suidelines for Eligibility and Chamsification, 47 Ped. May. 39454, Sept. 7, 1982. A mountd river must have the following:

- 1. The river corridor bust he largely primitive and must not show substantial evidence of human activity. Based on the description provided in the Draft LFIs, segment I obviously does not neet this standard. Segment 2 contains on I-15 bridge, four arms of rip-rapped banks, and highway I-15 parallels the river along most of the corridor. Additionally, within the corridor there is an unscreened highway rest area, recreational facilities including a home, campground, and pionic area, all clearly visible from the river.
- "Accessible in places by road." This segment is not
 only accessible by roads, but from exits off the I=15 highway.
 The traffic on the highway is visible from the river on such of
 this segment and traffic noise is loud and constant.

The WSRA describes scenic river areas as: "Those rivers or sections of rivers that are free from impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by road." is U.S.C.A. \$1273(b)(2). The only characteristic segment 2 does seet, is that it is accessible by road. This segment does not meet the definition of a scenic river found in the MSRA or the Joint Guidelines.

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magment 3

Segment 3, also fails to meet the "condition sesentially frae from human activity" regarding water quality as described above. This segment has been classified as "recreational." The MRRA describes recreational river areas as those rivers that are readily accessible by road and may have undergone minor diversions or structures in the past. 16 U.S.C. \$1273(b)(3). As already discussed in the eligibility amortion of these comments, this segment does not meet requirements for "recreational."

segment 4

Segment a fails to meet a "condition essentially free from human sotivity" regarding water quality as atsted above. This segment is also classified as "recreational" however it fails to meet any requirements for study or designation.

Interrelationships

This section does not mention interrelationahips with Utah or Mashington County. The major portion of the watershed and therefore water flows in the Virgin River comes from Mashington County. Since the Virgin River is not covered in the Colorade River Compact, Utah laws control the vater and water rights on the Virgin River in Utah. BiM's proposal for designation as a WSR to be followed by a claim to instream water flow (BIM Manual \$3551(.33)(8)(4)) when there is no legal basis to assemt control over the stream flow or water use, has all the appearances of a bid to control upstream water. This interrelationship should be recognized and fully discussed in this section.

Accping

Scoping meetings were held to identify issues. Any negative information obtained at those meetings appears to have been largely ignored in this document. A review of comments made at those meetings show there was considerable concern about impacts to commercial, agricultural, or residential development. There was also considerable concern expressed about the effects on existing perfected and unperfected, as well as future water rights. These major issues are considered, but not addressed.

Impacts on Commercial. Agricultural, and masidential bevelopment in Towns and Cities

The EIS concludes that there will be no effect on development, because the affect of designation will not apply to private, state lands or upstress water users rights. This is without basis and inaccurate. Since the flow of the river in most asgments comes from Utah and not Arizona, reservation of water for instream flows will limit if not prohibit additional diversions and perfecting of unperfected water rights and would impact the ability of towns and cities upstream in Utah to meet the needs of a growing population.

The cities in Mashington county are growing repidly.

Washington County grew from 29,900 people in 1980 to 47,825 in
1990. It is projected to be 147,438 by the year 2020. Utah Board
of Mater Resources, <u>Utah State Mater Plan</u>, p. 2-2 (August, 1993).

Growth in the past and in the future is dependent on water from
the Virgin Rivex. Anything which restricts and limits the

ability to manage and use water from the river will have major impacts on economic development and local customs, practices and policies.

Recause of the large federal ownership of land in the virgin River Dreinage, proposed water management actions elmost always involve public lands. Since permits for dem sites, rights of way for ditches, camels, and pipelines usually require federal permits, any action even though miles away from a Mild and Scenic River could be denied or delayed through the federal government's discretionary authority to approve or deny permits. As a result the net effect would be that dams and rights—of—way involving water either murface or underground could be denied.

A recent report, "The Economic Impact of Reducing New Diversion from the Virgin River System in Mambington County.

Utah", by John D. Groebeck, PhD, Department of Business and Richard A. Botson, N.S. Chairman, Department of Physical Science at Southern Utah University, indicates sajor economic impacts would result from restricted water management and conservation options in the Virgin River (Sims: Report attached herein). The economic impact of raducing total new water diversions in Machington County by one percent of current diversions (1.500 Annexest) follows as stated in terms of the number of john lost, percentage of industry jobs lost, and the real (1991 base year) dollar value or industry output lost:

Jobs Lost

1 Jobs Lost

Output Lost (\$)

POPULATION LOSS: 10,708

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A designation and assertion of instream flow requirements in Arizons would have major impacts on the upstress communities in Mashington County, Utah.

Impacts On Water Bights

This section of the Dreft LKIG maserts that there are no impacts on water rights:

Designation as a Wild, Scenic, or Recreational river would not effect existing, valid water rights. The Wild and Scenic Rivers Act creates a faderal reserved water right for a quantity of water sufficient to weather purposes of the act of the sufficient of the second of the act DIM, Draft LEIS, p. 20 (April, 1994)

One of these statements cannot be true. Now can the Wild and Somio Rivers Act orests a federal reserved water right and not affect valid water rights when all of the water in the river is presently claimed under valid perfected and unperfected water rights or applications? Where will the federally reserved water come from to meet the purposes of the Act if it does not come from valid, current water rights?

Another area the Draft fails to discuss, despite the Mater District's numerous requests for more information, is whether there is a distinction made between perfected and objected water rights. For example, will designation her holders of valid unperfected water rights from perfecting that right (i.e. putting the water to beneficial use)? This issue must be addressed in the orest this.

A multibility report, in this case the Draft LEIS, is required to contain an analysis of the foreseeable potential uses

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of the land and water which would be enhanced, foreclosed, or curtailed if the area were included in the NMSRS. The Draft states, "An ongoing instream flow study would be completed to determine minimum amounts to protect outstandingly remarkable values." SIM, <u>Draft LEIS</u>, Virgin Mild and Scenic Area Study, p. 2, River Appendix Volume 2 (Apri), 1994). The Draft goes on to state "this issue will not be discussed further." Ironically the impacts on the potential uses of water, without a determination of necessary instream flows, is impossible. This is one example, where the Draft not only rails to comply with the requirements of the Act procedurally, but also fails to comply substantively in the decision-making process. Thus, rendering the suitability determinations arbitrary and capricious and not in accordance with the law as prescribed by the Administrative Procedura Act, 5 U.S.C.A. 5706.

One of the major immuse raised during the scoping process for this LEIS is the effect on upstream water rights. These impacts must be recognized, quantified, and carried forward and analyzed in the document. To state that this proposal has no effect on valid water rights and that it will not be discussed further is inadequate and arbitrary.

Impacts On Federally Listed Fish and Wildlife Spedies

This proposal will have a detrimental effect on listed species. It will make it impossible, or at best such more difficult and costly, to construct needed management facilities and carry out other actions necessary for recovery of these

species. The proposed action would reduce the shility to regulate water flow in the river and will do nothing to protect these species above what is provided under the Endangered Species

Federal agencies are required to consult with the Pish & Wildlife Service on any action which may affect a listed species. There is no indication or documentation that this has been done. Alternatives

The No Action Alternative is clearly the only viable alternative mince the river does not beet the eligibility requirements in any segment. A) mo, the alternatives are such too narrow. We recommend the No Artion Alternative.

On-Going Management Actions

These are basically the same in all alternatives. There is no advantage under the preferred alternatives. Clearly, the No Action alternative is superior and would resolve the controversy and uncertainty now existing.

Table YR-3. Comparison of Impacts by Alternative

This table shows the proposed outstandingly remerkable values are not impacted under any of the alternatives. An attempt is made to show the proposed ection is better for vater quality, and aquatic and riparian values. However, there is no documentation to support this claim. There are no motions proposed which would improve water quality above what is already being done under ongoing management actions. This table is not accurate and is an attempt to make the proposed action look

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3.1

superior. The proposed action will in fact have an adverse effect on minerals and future water development and diversion, where the No Action Alternative does not.

This table should be redone to accurately document the impacts of the alternatives.

Affected Invironment

Outstandingly Remarkable Values

As shown under Resource Values above, there is no documented basis for the determination that the described values are outstandingly resorkable. This section is clearly an attempt to claim values which are not outstandingly resorkable.

Environmental Consequences

A comparison of the impacts of implementing the proposed action, verses the no action alternative, shows all values would be protected under the No Action alternative without the negative wifects of the proposed action on existing upstream water rights.

The attempt to show the No Action Alternative does not protect the described values by writing the conclusion in a different way, does not have besit. In all cases except aquatic and riparian values, the conclusion or the EIR is that ompoing management actions would protect the values. Under equatic and riparian it states, "due to a continuing decline in water levels or quantity, engoing management actions would not provide adequate protection for these values. "BIM, Draft LPIS, Vivoin River, at 78 (Niver Appandix, Volume 2). There is no documented basis for this conclusion. No actions are listed or proposed in

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the proposed action which would increase or even meintein weter flows. No evidence was presented that water flows are declining in the livel. Ironically, the construction of Quail Greek Reservoir and outflow from the St. George Sewage Treetment Pacility, two things the MERA would specifically exclude, have provided water flows in the river during periods when it was historically dry. Construction of additional water storage facilities upstrans would result in release of controlled flows to the river and increase flows during low flow periods. Stable or increased flows would be sore likely to occur under the No Action Alternative than the proposed action.

This should be rewritten to show there are no hegative environmental consequences from the No Action Alternative. The Suitability Assessment states, "There are no known threats to the Virgin River within Arizona." BLM, Arizona Brito Suitability Amaggament, p. 12 (September, 1991). If there are no threats to the river, what is the intended purpose of the proposal? The inescapable conclusion is it the BLM intends to include the Virgin River into the NHSRS to prevent use, conservation management, and other economic development, regardless as to whether or not the Virgin River mests the requirements of the NSRA.

Consultation and Coordination

This entire section lists the meetings held, newspaper advertisements, paid announcements, etc. On paper an attempt is made to show the requirements for coordination and consultation

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were met. The Water District has submitted comments or requested information on aleven occasions, regarding the effects of a Mild & Scenic River designation on upatrama communities. There is no section or indication that the proposal was modified in any way to reflect these comments. A review of the comments received at the acoping meetings show the majority were opposed to the proposals or requested modifications. The purpose for which consultation and coordination is required has not been set.

Preparers

It is noted that all preparers and reviewers are Bursau personnel. The Joint Department of Interior and Department of Agriculturs. <u>Final Revised Guidelines for Eligibility and Classification</u>, 47 red. Reg. 19434, Aspt 7, 1982, defines a study team as, "s team of professional from interested <u>local</u>, state and federal agencies invited by the study agency." There are no local professionals on the team as prescribed by the regulations during preparation of planning documents, suitability savessments, and the Draft 1815.

Apparently, the joint regulations which govern the MSR evaluation process, were not considered since they were not limited as a reference to the Draft LETS. The Mashington County Water Conservancy District has requested to be represented on the study term and our request was ignored. To ignore our request, public comments, and the regulations is not in Assping with either the spirit or the latter of the law.

References

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The Joint Department of Interior and Department of Agriculture, <u>Final Revised Guidelines for Eligibility and Classification</u>, 47 Fed. Reg. 39454, Sept 7, 1982, is not listed as a reference. Since the regulations take precedence over agency guidelines and manuals, they should have been used to guide the entire process. Failure to comply with the guidelines result in a procedurally flawed decision-making and Draft LEIS process.

Adendies and Organizations to Whom Copies Of The Document Will Se

Meither, Washington County or the Washington County Water Conservancy District is listed among the agencies to whom a copy would be sent. The Water District is quoted in the Draft LEIS and has provided information throughout the process, yet was were not considered an affected party. The Draft LEIS completely fails to analyze the impacts on Mashington County, even though the major impacts from the proposed action are in Mashington County.

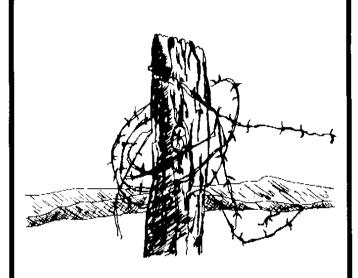
conclusion

The entire process is arbitrary and capricious. The criteria given in the MSRA regarding free-flowing was not followed. There was no criteria or documentation given as to how outstandingly remarkable values were determined. The eligibility and suitability evaluations did not comply with the intent or Kequirements of the Act.

The Draft LETS is inadequate; it falls to snelyts either the sconnells, social, or environmental impacts on communities upstream in Utah. There is no ruel determination of the economic impacts of the proposed section on the local customs and culture in Utah or Arizons, yet the impact in Utah alone would be tressendous.

The document states that the BLM is working on, or will work on in-stream flow studies to determine the smouth of water needed to meet the intent of the Act. This information, if it is to be used, should have been developed before this document was prepared, since issues surrounding water and its allocation is critical for meaningful analysis of the impacts. This document is deficient and inadequate without this documentation. An adequate evaluation of environmental and economic impacts of the alternatives is impossible without quantifying the smouth of water required to meet the purpose of designation.

In comparing the Environmental Consequences, the proposed action does not improve the Values above the present management. The Suitability Assessment, deted September 1993 states, "There are no known threats to the Virgin Biver within Arizons." It is protected by the current BEN Land Use Plan, by inclusion as an area of critical environmental concern, and wilderness designations. The woundfin Minnow and Virgin Chub are fully protected under the Turestaned and Endangered Especies Act. Since there is no need for additional protection of the stated values



26



it is apparent that water flow is the major issue, yet it is dissipated as not requiring analysis.

BLM has no water rights even though an application has been filed. There is no river compact to assure the flow of water into Arizona, making a designation meaningless. Attempting to control water flows and development of the river in Utah is an inappropriate and an arbitrary use of the Wild and Scenic River

We recommend the No Action Alternative be adopted, because the Virgin River fails to meet eligibility requirements and the Draft LEIS failed to comply procedurally and substantively with suitability requirements.

We have not completed a detailed raview of those sections of the Draft LEIS not related to the Vixqin River. However, a cursory review indicates the same problems and inodequaciss exist in every atream anguent covered by the Draft LEIS. We recommend the entire MSR eve)untion and documentation process in Arizons be re-evaluated and redons to comply with the requirements of the regulations, MSRA, and MEPA.

River Upstream in Utah

1

St. George Regional Sewer Plant Water Discharge-note: six million gallens per day are released into the river.

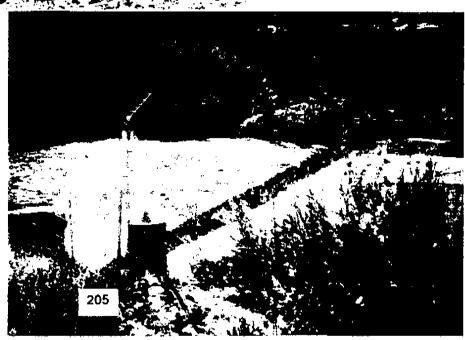




Water entering Virgin River from St. George Regional Sewer Treatment Plant

3

Fish Barrier to keep nonnative fish from coming up stream



SEGMENT 2



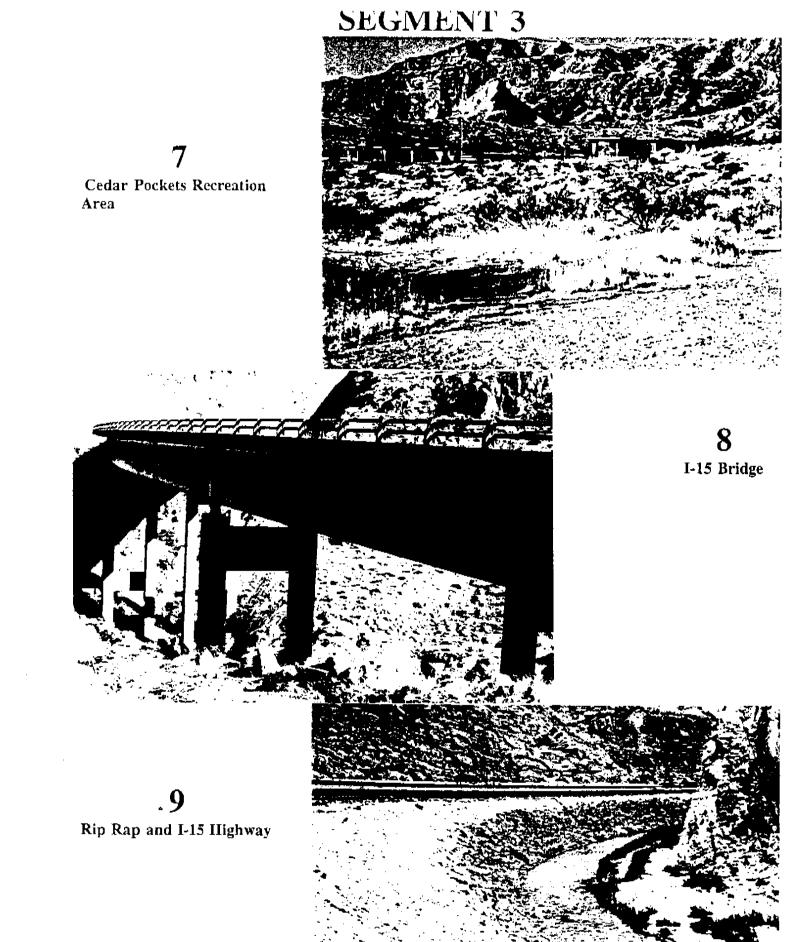
4 Black Rock I-15 Bridge

5 Home, Rip-Rap, and I-15

6

Rip Rap and I-15 There are 4 of these areas in this segment

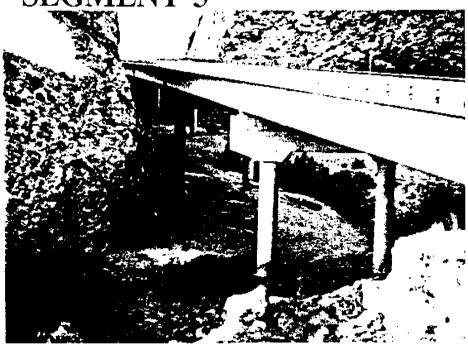




SEGMENT 3



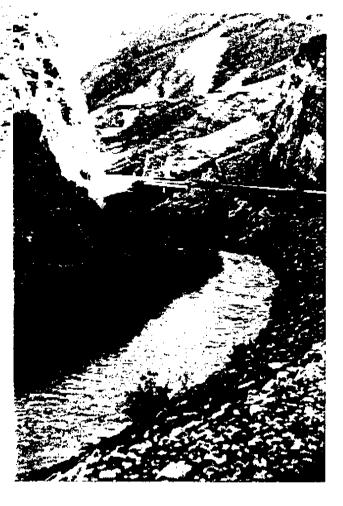
I-15 Bridge and channel change-- note: bridge pillars in the river channel



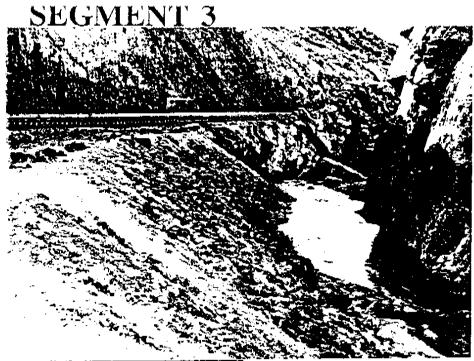
11 Rip Rap and Rock Cuts



12 Rip Rap, Channel Change, and Channel Straightening



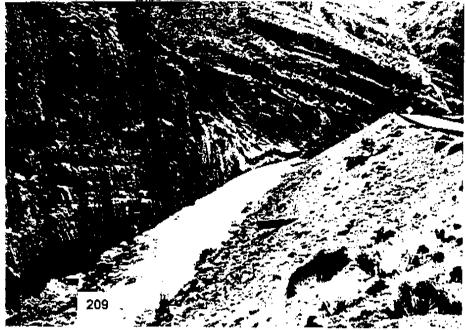
13
Channel Straightening,
Rip Rap, rock cuts, and
I-15





14
Rip rap, channe straightening, and I-15

15
Rip Rap, channel straightening, rock cut



SEGMENT 4

16

Virgin River at beginning of Segment 4-- note: tamarisk (salt cedar) stands and disclimax riparian, and upland vegetation



17
Developments
along river
above Beaver
Dam

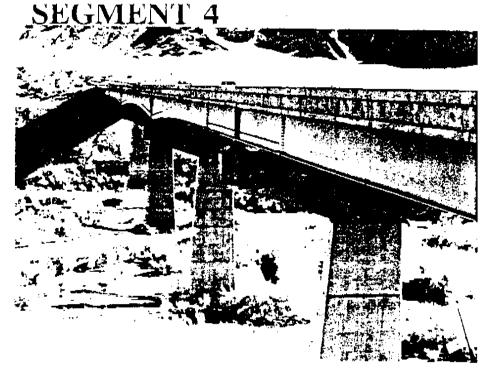
 $18 \\ {\rm Homes \ and \ farms \ in \ river}$

bottom.



19

Littlefield Beaver Dam I-15 Bridge-- note: disclimax vegetation



20 Littlefield Homes and Farms

21
Home and Well along river above Mesquite Diversion-note: common modified vegetation



SEGMENT 4

Mesquite Diversion-- note: this major structure raises the river several feet





Mesquite Canal note: 12.6 cfs is diverted and carried by this canal



United States Department of the Interior

BURGAU OF LAND MANAGEMENT



6351" (771)

April 20, 1994

Mr. Ranald M. Thompson Washington County Mater Conservency District Suite 1 136 Marth Log East St. George, UT 84778

Bear Mr. Thompson:

This is in response to your letter of March 24, 1994, rogarding the Sureau of Land Management's (BLM) evaluation of the Virgin River as a potential wild and scent river.

Eliuibility, Determination

The oligibility determination was conducted in conjunction with the Arizona Strip Resource Management Plan, approved January 1992, not part of the suitability assessment. The plan and Environmental Japact Statement were finalized in December 1990. The Yippin River in Arizona was found to be aliquible for inclusion in the Mational Wild and Scenic River System. Enclosed is a copy of Appendix 18 which discussed the eligibility and classification criteria.

The aligibility of the Yirgin River was subject to full public involvement arraview. In addition, Washington County Commission was sent a copy of the Draft Resource Management Plany[Anvironmental Impact Statement. Comments regarding eligibility would have been appropriate during public meetings and raview of the draft Jodocoments between Colober 1807 and December 1909.

Uppn approval of the Artrona Strip Resource Management Plan, the Virgin River was formally found to be eligible for inclusion. The Federal lands associated with the Virgin River also became subject to protective management of the wild and scenic river values by virtue of language in the Resourch Management Plan.

Suitability Assessment

The suitability assessment report on the Wirgin River, dated September 1993, was a result of a request from the Arizana Congressional Dalegation to accelerate the avaluation process for all eligible rivers. As you have noted, the report recommends that the Arizana portion of the Virgin River be considered suitable. Because of the complexity of the antire watershed, BLM falt that no recommendation for designation could be made until the entire river rare in three states watershed suitable. Second the second of the Mational Wild and Scentc Rivers System Act.

This alternative was corried through to the draft environmental twocut statement, as well as the other alternatives: Recommend as Sultabla, and No Action.

Praft Environmental Impact Statement

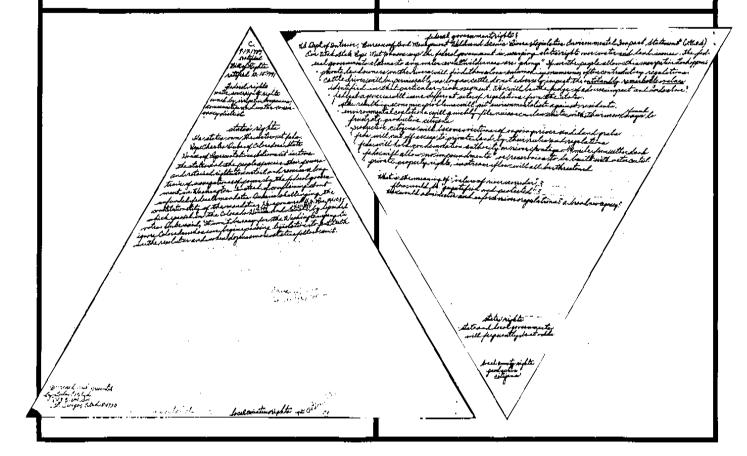
You have been sent a copy of the Arizone Statewide Wild and Scenic Rivers Legislative Environmental Empect Statement. Enclosed is an additional copy for your reference. The 90-day Comment period will be open until July 8, 1994. In addition, a public hearing will be held in St. George, on May 19, 1994, to gather public comments on the three alternatives.

We recommend that Mashimpton County Mater Conservency District review the environments] impact statement, and provide comments on the elternatives. Though the eligibility determination phase has been completed, your concerns about our evaluation could be raised through Comments in response to the Draft Environmental Impact Statement.

Sincerely.

ż

Enclosures



COMMENTS ON. DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT WILD AND SCENIC RIVER ANALYSIS OF VIRGIN RIVER

By Washington County, Utah

Washington County. Utah, is greatly concerned with the analysis of suitability of the Virgin River in Arizona for treatment as a wild and scoric river contained in the Draft Anzona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (DLEIS) dated April, 1994. The Bureau of Land Management (BLM) has apparently cheath to ignure the specific requirements of the Wild and Scenic Rivers Act (WSRA) in favor of an arbitrary decision to find a way to justify giving the Virgin River a appelial status not authorized by faw.

The Virgin River as it passes through the Arizone Strip falls to meet the basic requirements of the WSRA that the river be "free flowing" and that it have "outstandingly remarkable value." Even a cursury look at the Virgin River as it can be seen from the interstete highway (I-15) through the Virgin River Gorge revaels a number of autstantial man-made elterations to the stream channel. This can hardly be what Congress intended when it determined to give rivers with "shorelines essentially [or largely] primitive, . . . the vestiges of primitive America" this special status. (Ses. 16 U.S.C. § 1273(b)]. A determination of outstendingly remarkable value must be made in comparison with other rivers in the same or a similar physiographic sevironment. No outstendingly remarkable values have been articulated in the proper context for the Virgin River in Arizona. This failure to

Comments by Washington County, Unit

provide a meaningful substantive discussion of the values assessed, in context, constitutes an abrogation of responsibility by the BLM in this process.

The DLEIS asserts that designation of the Virgin River as wild and scenic will not offect valid existing water rights, ignoring the fact that existing water claims account for the entire flow of the river. Any unlisteral action taken by the BLM to assert rights to instream flows can only succeed through interference with the exercise of valid existing water rights upstream in Utah. Such actions would implicate not only vested property rights but also the quality of life in Weshington County. Such decialons should not be made without adequate consultation with the holders of those rights, not limited to formalized opportunities to "comment" in this process. The structure, content and process of this DLEIS ensure that meaningful consideration of the interests and needs of holders of water rights in Washington County will not be adequately accounted for.

The ULEIS feels to indequetely address the impects on Washington County which will or may arise from designation of this river argment as wild and scanic. The assertion that the designation would have no affect on development must be questioned by physically who is familiar with growth in this region and the current aratus of water rights and uses. Congress is entitled to have a complete analysis of all the impacts for consideration during its deliberations on BLM's recommendations, not a one-sided version designed to lead to the result agency staff have selected as preferable.

Community by Municipal County, Uto. Page 2

Before a final LEIS is issued, the BLM should consult directly with local collicials in Washington County to ensure appropriate consideration of impacts on the County and to provide for adequate consideration of the many areas left unaddrassed by the DLEIS. The final LEIS should specifically address the broad range of information available and concerns which have been expressed, without omitting information which does not support BLM's desired conclusion. In the alternative, the "No Action" alternative should be selected, since the DLEIS does not provide an adequate basis for availuating the wide-ranging affants any change in the status of the Virgin River would have on Washington County.

The DLEIS gives whort shrift to enalysis and decisions which will have substantial and ler-reaching impacts on the people of Weahington County. This cavalier approach to the enalysis is an improper exercise of administrative authority which must be corrected before any supportable conclusion can be reached.



United States Department of the Interior

OFFICE OF THE SOLICITOR
OFFICE OF THE SOLICITOR
OFFICE OF THE SOLICITOR
OFFI OVER WATER PRODUCT
MAIN COST, VIAM #4(5)

March 1, 1994

HENORANDUM

To: Utah State Director, SIM

From: Regional Policitor, Intermountain Wagion

Subject: Wild and Scanic Rivers Act and ptw Manual Section \$351

You have asked us for guidance as to the legal standing and sufficiency of BLM Kanual section #351, particularly as (t regards BLM's management protection for slighths and suitable river segments, and the types of samegement production for the standard production for the standard section for the RMP/RIS. Due to the nationwide implications of the following legal advice, it has been reviewed and approved in our headquarters office.

For the teasons sat forth below, we conclude that BLM Nahuel saction \$151 arroneously mandages interim proteoxion of all streams found eligible and given a tentative olsseification. In fact, any such proteotion so glaven is entirely a discrationary planning decision arising from the land use planning process. The Wild and Josnic Rivers hat does not require each proteotion. Any interim proteotion provided by the StM must therefore comply with the requirements of section 102 and, depending on the attent of proteotion to be activated, the withdrawl provided as attent of proteotion to be activated, the withdrawl provided as attent (FIDMA).

BACKGROUND

The SIM is developing a resource management plan (RMP) for the Dixie Resource Area, i.e. Washington County, (Tehn. As part of the planning process, rivers in the country are being examined to determine which attrake and atrake segments the SIM would designate as allyible for protection under the wild and Scenic Rivers Act.

Communica by Workington Commy, Uten Print J The BIM Manual (Manual) emotion 6351.33C provides as follows:

when a river segment is determined eligible and given a tentative classification (viid, sendor and/or recreations), its description (viid, sendor and/or recreations), its description (viid, sendor and or recreations), its description (viid, sendor and viid) as attenta rights, and whill the plaintiful values shall be afforded description, subject to valid existing rights, and whill the plaintiful values and subscription is supermedial, senagasant, satisfies and subscription is supermedial, senagasant, satisfies and subscription is supermedial. In the subscription of supermedial content of the supermedial content of the supermedial subscription of the subscrip (Ares/Dietr

Your questions arise from this lenguage, which has the effect of tandating interim protection for rivers found to be slighble and given tentestive clearifactions, penthny possible thurs action by Congress. In order to be able to convey clear answers to your questions, we will first describe the provisions of the Mild and downlot Rivers act and then onepers the requirements thereof to the related standards and procedures contained in the Bild Menual.

The Wild and Scenic Rivers Act

The Wild and Scanic Rivers Art (the Act), Pub. 1. Up-Nel, 15
U.S.C. \$\$ 1271-1287, was presed on October 1, 1948, in an effort
occupant of the product of the Act of the Act of the Computation of the Product of the Computation of the Product of the Computation of the Product of the Act of the Product of the Act of the Product of the Pro

Congress also prescribed the methods by which and standards according to which additional streams were to be added to the system. Is U.S.C. § 1727. Rivers could only be included in the system if they were sither (1)— suthorised by an Act of Congress or (2)—dasignated as wild, seeming or reportstional tween by an act of the lagislature of a state through which they flow, and then approved for inclusion in the MMRR System by the Secretary of the Interior. 1s U.S.C. 1273(a)(ii), Rivers included in the

NMSS System ware to be classified in one of the following outspories:

Fild river areas - those rivers or sections of rivers that are free of impoundments and generally inaccessible succept by trail, with watersheds or short-lines sessnitally primitive and weters unpolluted, representing "westiges of primitive America."

Scenic river ereas - those rivers or sections of rivers that are free of impoundments, with shorelines or vatersheds still largely printing and shorelines largely undeveloped, but accessible in places by r

Recreational river areas - those rivers or sections of rivers that ere <u>readily accessible</u> by road or reitroad, that may have ages <u>davelogment</u> along their shorelines, and that may have undergone <u>gone impoundment</u> or divergion in the meat.

16 U.S.C. 5 1373 (Emphasia added).

16 U.S.C. 5 1273 (Emphasis added).

Please note that the Act specifies that "wild" and "suvaic" areas are "tree of impoundments." Recreational river areas are 11 km/se free-cloving, but previously say have contained impoundments or distrations which have since bessed operation or have been removed. With this sole exception, the distinctions smoot been observed and source sibility and degree of shoreline and adjacent development. This point is emphasized in 18 U.S.C. 5 1273(b). Therein it is staced that "islayer wild, meaning or recreational river in the tree-clowing condition, or upon restoration to this condition, shall be considered alignible for individual, shall be observed and if individual, shall be observed and if individual, shall be observed and if individual, shall be observed and in the state of the the terms "wild, "seconic," and "secretionals are used in two menses in the Acts one, descriptively, as in the first two menses in the Acts one, descriptively, as in the first two menses in the Acts one, descriptively, as in the first connoting specific legal outagories of congressionally designated MMSSS Systam components.

Section 1275 provides the procedures by which ather where

Section 1975 provides the procedures by which other rivers are to be studied and either renommended or not recommended to the congress for inclusion in the NMRE system. This section of the Act requires the Secretary of the Interior and the Secretary of Agriculture, as appropriate, for the atrame in question, to study and subsit to the President "seports on the animality of the Area of th

"aligible" (in their free-flowing condition) were then to be further studied for their "suitability."

Section 1774 then lists specific tivers as "potential additiona" to be so studied. Section 1278(d) gass on to require all federal Adencies to give consideration to the potential for viid and seemld designations in their planning activities on edditional river areas, but is noticeably slient on the subject of protection for these agency-identified witness.

In all planning for the use and davalopment of water and related land resources, consideration shall be given by all Federal agencies involved to potential netional wild, scenic and removestional river areas, and liview beach and project plan reports summitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interjor and the decreatary of Apricolture shall sake specific studies decreatary of Apricolture shall sake specific studies decreatary of Apricolture shall sake specific studies that are shall be available in planning reports by all rederal agencies as potential sitemative uses of the vater and related land resources involved.

16 U.S.C. 5 1276(4).

Thus, in addition to requiring Congressional action to place a river into the NMSB System, and establishing three categories of streams within that system, i. wild, scenic and recreational, the Act also established three lavels of consideration and treatment by the Interior and Agriculture departments: (1) - those streams which Congress placed in the system in order to determine speroprists categories), (2) - streams which were apacifically caseful that the congress of the

alternative uses of the water and related land resources involved (in the area dovered by the plan). 16 U.S.C. \$ 1275(d).

(in the area dowered by the plan). 16 U.S.C. \$ 1270(d). Congress thus established a system of escending levels, whereby a given stream, in order to be included in the MMRR system, had to, in search. Salth) the landour. I stream sunnargasionally designated for notential addition were to be studied for sultablity, With reports thereon submitted to the Frazilant for recommendations on MMRR System seeignstion by subsequent and of Congress. A decision by the squary, the Secretary of the Congress. A decision by the squary, the Secretary of the U.S.C. \$ 1278(b). Other atreams from turther consideration in U.S.C. \$ 1278(b). Other atreams, identified sther by the squary studies mandated in section 1374(d) as qualifying as potential alternative usass of the water or by faderal squaries as protential alternative usass of the water or by faderal squaries and be designated by Congress for "potential addition," specifically studied for subtablity by the appropriate agency, with a report submitted to the Frezident, recommended by the President for designation, and then possibly designated by Congress as components of the MMSR System. 14 U.S.C. \$ 1272.

The questions you have raised for our consideration involve streams in the latter class, numely streams which wave not designated by Congress either as part of the MMRR System or a "potential additions" to that system, but rather involve streams identified as comprising "potential wild, scenic and recreational river areas" or as "potential alearnative uses" during the land use planning process by faderal agencies, in this case the SLM, hore specifically, your questions involve the extent to which protection may be afforded to streams so identified by federal agencies but not yet given the levest type of congressional designation as "potential additions" to the MMRR System.

Statutory Protection Schome

The subset of protection established in the Act is distriy sized at streams compressionally designated either as system components or as "potential sedditions," essentimes referred to as "study rivers." The specific protections for these two optoported of attenues are found at 18 U.S.C. S. 1978. Per designated MMSR system component streams, regardless of category, section 1278

этомеренорогов выстеру вывышения

For convenience, hereinsfter, the terms "wild, scenic and recreational" will be referred to se designation "categories" of NWER system rivers, unareas the distinction between straight congressionally designated as NWER systems rivers (Will an appropriate designation "designated as so consistent of the congressional of the congression to the congression of the congression to the congression of the congression to the congression to the congression of the congression

On streams designated for inclusion in the system by a state lagislature, the Sacretary must submit the proposal to the Sacretaria submit the proposal to the Affected faderal department or agancy and consider their domestic and racommandations before approving or disapproving considerations. If the Secretary approves the proposal, it submitted the Sacretary approves the proposal, he must publish notice thereof in the Poderal Register. 26 U.S.C. 1378(c)

specifies that the Federal Energy Requistory Commission (FERC) shall not license the construction of any dam, water conduit, reservoir, powerhouse, transmission line, or other project works under the Federal Power Act. 16 U.S.C. 701s at seq., on or directly affecting any river which is a designated component of the NMSR Mystam. Olimitarly, all other federal departments and agencies are prohibited from essisting, by loan, license, grant or otherwise, in the construction of any mater resources project that would have a direct and adverse effect on the values for which the triver was designated. In other words, FERC is not to build water devalopment project, and no other federal apancy is not on on which the NMSR designation was intended to protect. Yellow which the NMSR designation was intended to protect the resource devalopment above and below designated Publish which resource devalopment above and below designated according to the control of the contr

System component.

Subsection 1278(h) provides the protection to be provided on river designated for "potential addition," i.s. those streams that have help been designated as Miss System components but which have been congressionally designated for study end possible inclusion. FERC and all other federal agencies are subject to the same restrictions on these streams, i.s. those listed in section 1276(s) or by later act of congress for "potential eddition," as they are on streams sirsed designated by congress to the same restriction are tiss listed in protected for 10 years following occupies 1378 when the same protected for 10 years following occupies 1378 when the same protected for 10 years following occupies 1388 were to be so protected for 10 years following occupies 1388 when the same following the studied for potential additions designated by congress to be studied for potential additions and protected for only 1 full fiscal years, unless Congress specify protected for only 1 full fiscal years, unless congress specify here periods period in seking the designation. These 10 and 1 year periods period in the secretary concerned were to determine after study that such river should not be included in the hMRR System. 18 U.S.C. 5 1278(h).

not be included in the heat system. As u.s.c. 3 isre(n).
Additional periods of protection of 3 years and 1 year are
provided for congressional compideration of departmental
recommendations on "potential additions" (study rivers) passed
transmendations on "potential additions" (study rivers) passed
transmended by defer secretarial consideration of
the secretary respectively. 14 U.S.C. \$1174(n) (11)
Becretary, respectively. 14 U.S.C. \$1174(n) (11)
Becretary respectively. 14 U.S.C. \$1174(n) (11)
Becretary respectively and the President is years to
complete a study and make a recommendation on suitability for
inclusion after such congressional designation, and subsection
(11) thereof then extends the protection on additional 3 years
for congressional consideration if the Secretary does recommend
such a "potential addition" for permanent protection in the NWSE
System. If these periods expire, or if a congressionally

designated "potential addition" river is not recommended for the mext higher level of review, all protection desses under the estatutory scheme, and the river and surrounding lands are again available for FERC applications and the like.

DISCUSSION

DISCUSSION

Must is particularly notworthy in the Aut, for purposas or the present questions, is that he brotection whatsoever is afforded by the Wild and Scenic Rivers Act to streams on the lowest range of the designation ladder, i.e. those having no compressional designation ladder, i.e. those having no compressional designation at all, but identified by federal spanoias as potential wild, scenic or recreational view reman expresenting "potential wild received the recreational view reman expresenting "potential siterative wass of the water and related land "resources" during the land was planning process. Any protection given to these attracts are land uses planning decision under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 202 or by very of a withdrawal under FLPMA section 302 or by very of a withdrawal under FLPMA section 302 or by very of a withdrawal under FLPMA section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section 302 or by very of a withdrawal under the section where discretion under the Act to consider other potential land uses and public land user needs than the Manual, we presently drafted, allows.

The Wild and Scenic Rivars Act thus varies wonsiderably from section 503 of SIDMA, for anymple, which designates wilderness study areas (wgAs) for consideration for protection under the Wilderness Act, 16 U.S.C. 51131 - 1135. In swotion 601(4) Congress Bendated that while under study, the MMRs were to be managed "in a manner so as new to impair the suitability or such areas for presented in a winderpress," with specified insited exceptions. A MMS, in order to rewest to notwer public land a second of the contrast of the c

Congress for formal designation as a NMSE System component. The Wild and Scenic Rivers Act has been implemented by the Departments of the Interior and Apriculture through the publication of joint wouldailhes for aligibility. Classification and application of joint wouldailhes for aligibility. Classification will be a common of the control of the con

The public comments and responses accompanying the regulations do. however, contain an interpretation of the purpose of the act which is useful for our purposes. One comment reselved on the draft regulations searched that the "definition of the term cutationingly sweapthable value is to vague and too liberal. Too many rivers will be eligible for designation, unreasonably constraining sconges devalopment of hatural resources." The federal response what the

(b)standing of the need for proteotion varies development of each river area will be considered by the Congrams in deciding whether or not to designate the river area. A determination that a particular river is slighle for designation does not necessarily

protection afforded under this Manual provision is a Voluntary action by BLM accomplished under its generic authority in FLFMA.

imply that designation is the best use of the river in terms of the national interest."

Id., at 19454.

This interpretation is consistent with the Act's policy statewart in 16 U.S.C. \$ 1271 that the MMSR policy is to consistent in 16 U.S.C. \$ 1271 that the MMSR policy is to constitute the state of the s

The BLM Namuel thus affords greater protection on an interim basis, with no time limits, to streams identified in land use planning than Congress itself provided to designated "potential additions" to the What Mystam. In faut, this interim protection could become virtually parameter if no recommendation for could become virtually parameter if no recommendation for injuliaries action in ever submitted to Congress; and, if it involves a situative action is ever submitted to Congress; and, if it involves a situative of the land, such protection possibly violates FLPPM section 304(3), which prohibits the Senretzy from making a withdrawal that can be made only by an Act of Congress.

making a withdrawal that can be made only by an Act of Concress.

The Manual language in section sizi.iDC specifically the portion ratting that "its identified outstandingly remarkable values that is a fordered. . proteotion . . and until the eligibility data-raination is supera-eded, management sotivities and authorized wese shall not be allowed to adversally affect and authorized wese shall not be allowed to adversally affect though it was patterned after the wilderness requirements of section 601 of Fibra, rather than the Wild and doesno Rivers letter to complying with the required at the result of the result of the result of the configuration of the result of th

³ PLPMA section 202(a)(1), 43 U.S.C. S 1702(a)(1), requires that if an eres is to be removed from the operation of the Mining Law of 1872, this can only be accomplished by withdrawal under section 202.

A If the Wild and Sceniu Rivers but had mandated this result our conclusion would be quite different, for Congress certainly has the plenary authority under the Constitution to either mass withdrawals itself or to direct federal agencies to do so in such cases. The fact that it did not do so, however, especially when coupled with the fact that it provided only limited protection (I years, for example) for streams that it designated for study "potential additions" to the MMSR System, makes it clear that the

We would also note that these "guidelines" were intended for internal federal use only and were not published or codified as formal regulations.

environmental consequences.

environmental consequences.

We would suggest that segments of streams identified as allyible under the Act and which RIM signs to hundr and mronness for MMRR System designation. In the form of isolaisting submitted to Compress for passage, he withdeam for 3 years pursuant to section 204(d)(3) of FLMMA (3 years is the maximum, but 1 appears zone in keaping with the statutory scheme of the Act) "to preserve such tract for a specific use them under consideration by the Congress." If Compress does not not within the tests of by the Congress. If Compress does not not within the tests of the Act the MMRR System, thereby gaining the additional 3 years of protection provided by section 1378 of the Act, the withdrawal would expire under its own terms, and the lands would be opened immediately to multiple was sanapsement, 41 C.F.M. 53 1991 at EEG, specifically 5 1091.6. This approach is one, although others are osetalmly possible, that is consistent with both the Act and FLFMA.

CONCLUSIONS

CONCL

In addition, faderal apencies were directed in the ware section of the Act to consider SMAR protention as one of the available alternative wass of land in conducting land use planning. Accordingly, that consideration should be given in the preparation of any land use plan where appropriate. The SIM Nanual, however, requires protection for all streams found to be slightle. This unnecessarily restricts SMA's land use planning flexibility under FLPMA section 302 by mandating the decision to

'This approach would also obvists the necessity of conducting autisbility attudy until Congress designates such streams as "potential additions" to the NHER System.

he made. This might also be result to violate both NEFA, as constituting a decision in savence of MEDA study, and the specific vichdrews! provisions of section 104 of FLPMA. We recommend that the Menuel be revised in accordance with this solvies.

We hope this information is of assistance to you. If you have any further questions or comments concerning these issues, please contact the undersigned at (80), 504-507.

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A Systematic Approach to Determining the Eligibility of Wild and Scenic River Candidates

U.S.D.A. Forest Service Columbia Gorge National Scenic Area

Land and Water Associates

June 1, 1989

A Systematic Approach to Determining the Eligibility of Wild and Scenic River Candidates

A model approach prepared for use in the Klickitst and White Salmon Rivers Study

U.S.D.A. Forest Service Columbia Gorga National Scenic Area

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INTRODUCTION

The Wild and Scenic Rivers Act establishes that it is nanonal policy to "preserve uselected rivers or sections thereof in their free-flowing condition to protect water quality of such invers and to fulfill other vital national conservation purposes." The Act also states that these rivers "thall be preserved in free flowing condition, and that they and their immediate convoluents shall be protected for the benefit and edgyment of present and former generations." This policy is intended to "complement" other national policies which promote river development.

The Act and subsequent regulations establish guidelines for which rivers will quality for inclusion in the National Wild and Scenic Rivers system. In general terms, to be eligible rivers must:

- 1) be free flowing, and
- possess natural and/or cultural river features which are judged to be 'outstandingly remarkable'.

In the 20 years since the Act was passed, a number of rivers have been studied for inclusion in the system. Approached used to evaluating chandidate rivers have been quite variables purchashed services been guite variables for the controlled of t

Practitioners in the field have been fraurated by this lack of definition; policy makers have been equally fraurated by the resulting lack of consistency among individual wild and scenic triver studies. Therefore, the purpose of this seport is to identify, within the framework provided by stritting galedine, a systematic approach to determining the eligibility of wild and scenic river candidates, specifically including more raised galedines for assessing the significance of their resource values.

The report grew out of an effort by the authors to devise a retional process for determining the eligibility of the Elicitias and White Salmon Rivers in Kliekirst County, Washington for designation as Wild & Sounce Rivers. The concepts discussed here have been tested and refined through that project. Gludiance in the preparation of the report was provided by resource managers from the USDA Forest Service, Region Six and the USDI Bureau of Land Management. Oregon State Office.

This approach builds on existing wild and scenic study guidelines as well so other accepted resource assessment concepts. The main points in the approach are somewhead in the following section and explored in greater detail in the third section of this report.

1

SUMMARY

Approach to Eligibility

As indicated earlier, to be eligible for inclusion in the Wild and Secure Rivers Program a river (or river segment) must be firee-flowing and possess natural and/or cultural features which are judged to be "ourstandingly remarkable". When an agency evaluate a candidate river, findings on these points are included in an "eligibility report" or a larger "anuly report" which may cover issues beyond eligibility. The purpose of this effort is to outline a defenable step-by-step approach to conducting eligibility evaluations which is consistent with the purposes of the Art and oxisting guidelines.

The key features of the approach recommended here are:

- the use of explicit comparisons to avaluate the relative significance of similar areas;
- a focus on features which are directly siver related:
- o governge of both care and representative/exemplary features; and
- the standard that "outstandingly remarkable" features must be at toust regionally significant.

This approach is recommended as it is open, accurate, and supported by the law and agency guidelines. Further, by adjusting the degree of detail and documentmon required to respond to the sensitivity of river management issues, available funding, and time constraints, this same approach can be successfully applied to relatively simple situations requiring only a limited evaluation or to complicated distantions requiring much more applicated and refined analysis.

Major Steps in the Process

The mujor steps involved in developing an eligibility report are shown in Figure 1. They flow from tentative decisions about dividing the river into hormogeneous sections, to evaluating resource applificance, and finally determining the eligibility of the river for inclusion in the Wild and Scenic River System.

Significance Thresholds

Analyses companing the value of one river to ambiter do not in and of themselves determine if a feature is "outstandingly remarkable". One further step is needed. That is, establishing a minimum level of significance for such features.

It is clear that resource features that are nationally significant qualify as being outstandingly remerkable. In addition, the Wild and Scenic Rivers Act, as well as subsequent Congressional and agency actions support the position that repleasily significant features also qualify. Consider that:

- Congress clearly intended rivers included in the system to have more than local significance;
- Congress has itself designated rivers of regional rather than national significance as Wild and Scenic; and
- Both agency guidelines and the National Rivers inventory recognize the importance of regional representation in the Wild and Seemic Rivers System.

Hence, this approach recommends using the standard that "ourstandingly temarkable" features must be at least regionally significant.

The Scope of Inquiry

The flaal key point in this approach involves the nature of features which quality a river as eligible. Two concepts are involved here. First, this approach recommends that qualifying features be limited to those which are directly view related. The rationals is that this is the Wild and Second Rivers Program rather than a generalized land and resource conservation program and it is therefore appropriate to focus attenuou on the river and resources related directly to it. This does not mean that other features (for easyingle, a rure plant habitat well removed and unrelated to the rivery should be ignored in either the resource assessment or development of the management plan, only that they should not be the rationals for determining eligibility.

Second, among river related features, 'examplary', as well as rare features, are recommended for evaluation. Exemplary features are outstanding azamples of common but important types. For instance, the bughest entity bablist of an important shall appear to the state of the stat

THE STEPS IN THE PROCESS

As outlined above in Figure 1, there are 8 steps in the eligibility process. These are 44 follows:

1. Divide the river into homogeneous sections for analysis.

HOW

The first step in the eligibility process is to break the study area into sections with similar conditions. These sections will generally be several miles to length and discurgioshed from one another by major rather than almost changes in resources or land uses. For example, one section of a river might be characterized by a deep rocky gorge with a forested short-line and another section by agricultural land use and a streambed just slightly below general ground levels. As this step takes place easily in the study process, the distinction between sections is made based on a preliminary evaluation of isnd forms, resources, and land uses. The division of the river into sections may be redefined later based on the more detailed analyses which follow.

....

For a river with variable conditions, treating the river as a whole may obscure important differences among its sections. Dividing the river into sections increases the resolution of the analysis and can later serve as a foundation for evaluating management options.

2. Determine if the sections meet the free-flowing thresholds.

HOV

Conduct an analysis of the character of each of the sections identified in step 1, to determine which rives sections meet the thresholds for free-flowing character contained in the Act and federal guidelines. In essence the section must remain riverine in appearance and be free of high head dams and extensive rip-ray or diversions.

WHY

There is no point in doing extensive resource analysis on river sections that will not qualify under the Act.

4. Evaluate river features.

HOW

In the case of rare features, document that they are rare in the region or the nation wither by ofting an existing authority (for example, lists of threatened or endangered species) or less frequently by evoluteing as independent study to demonstrate their rarny. In the case of threatened, sendangered, or otherwise rare species "outstandingly remarkable" riverance habitors should have substantial value for the species involved.

In the case of exemplary/representative features, prepare a comparative analysis of similar features in the region or, where available, circ an exicting study which demonstrates that they are exemplary (see Maine's Whitewater Rapids for an example of such a study).

If financial resources are limited, time is short, the aissuation does not justify an "indepthcomparative evaluation, or quantizative data does not axis for all rivers in question, a simplified 'quantizative' evaluation process is the best approach. This could be conducted by an expert or team of experts with considerable knowledge of the subject and the agographic arcs. This would involve rating a series of representative rivers in the region against pre-relected enterin using 'professious' judgement'. Such an approach is more than subequare for many shardons and is all that is possible in others. (See the Pacific Northwest Rivers Study's resident fish evaluation for an example of this type of analysis.)

When preparing a comparative analysis, the steps involved include:

- 1. Identifying resource considerations to be used in the evaluation,
- 2. Identifying the region that will be used for comparison,
- 3. Collecting necessary information,
- 4. Comparing areas using a ranking scheme,
- 5. Determining significance levels, and
- 6. Circulating a draft for review.

Resource Considerations

Identify the resource factors or considerations that will allow you to decide which areas are more important than others. These considerations should include the full range of characteristics which may distinguish our area from another. For example, in the case of anotherous fabores in a portion of the Pacific Northwest, the following considerations were included in the ranking:

Rankin

Once the information is collected tank the tivers based on the considerations identified satist. Either a verbal or numerical scheme may be used. A convenient scale is as follows:

Rating	Significación Level
0 - not present	sor #gothcuor
t - 1645 pignificant rived most in the region	net significant
 rypical, one of many equally significant in the region. 	łocally significani
) - out of only a few this agenticant so the region	regionally significant
to the most ego-Weam in the region	regionally or (possibly assistantly significant

The ranking information can be conveniently displayed in the form of a matrix. Once again, using the shadromous fisheries example, if overs in the Pacific Northwest were rated as follows:

Rayers:	A	8	c	D	F	F	G	н
Habitat Quality Number Spenzia Value Spenzia Value Spenzia Namaria Rapproduction Vager of Filia Recornational Sugmitance Halorick Sugmitance Procental Significance Foreign of Spenzia	1 3 3 0 2 2 2 2 15	2 2 2 2 2 2 2 2 2 2 2 2 2 3 3 3 3 3 3 3	3 3 3 2 2 3 4 4 27 75	2 2 2 3 3 2 2 20	1 3 2 1 7 2 1 1 16	3 3 4 2 3 75	3 4 4 4 2 3 4 29 61	3 3 1 2 1 3 1 80

Using this analysis rivers C, F, and G are clearly the most ugaisticant in the region. Note that the level of detail required in the analysis depends on many factors including the nature of the resource, the data available, established benchmarks for agnificance, etc. Many analyses thus need not be at involved as the example shown here.

Desermining Significance

Once the necessary data is collected and areas are ranked, significance levels may be described by inspecting the results for natural groupings and by using resources with known levels of significance as benchmarks. For example, if one fiver in the area has stretch been designated Wild & Scene because of a particular resource value this unformation can be used in establish the relative significance of other river segments included in the ranking.

6. Combine the results of individual analyses.

но₩

Combine the results of individual avalues undertaken in step 4 to assess the overall significance of first, each river section and second, the river or river segment as a whole A marry provides a clear and efficient way to depict this information. Such a marry is shown on the following page.

(Note that a matrix of this type could also be developed to display classification findings. This, however, is beyond the scope of this report.)

Each cell in the matrix depicts the level of resource significance determined in step 4 for each resource estreport and each river segment. These levels can be represented either numerically or verbally. A convenient scale is as follows:

Rating	Segminosince never					
D - not present	nor rightlicus:					
1 r less significant than most in the region.	soi algolificasu					
2 - typical, not of many equally significant in the region	locally significant					
 one of only a few this significant in the region 	истолију проједи					
4 - the most significant in the region	reposably or possibly nationally significant					
mannest scale offers some advantages in this regard as it can be read more quickly see colories withers unambiguously, and allow easy interpretation of a discrimination						

A museum it sale offers some advantages in this regard as it can be read more quickly, subsequently the Market unaminating state of the fore-flowing row in the matrix, a row will be judged pounterly if it meets minimum thresholds and negatively if it does not.

The total value of a river may be more than the sum of its resources evaluated individually. Total value can only be evaluated by impecting the combined results of undividual sasessments. For example, while individual resources may have only local significance, when considered together, they may be regionally important.

8. Determine if the river is eligible.

Using this methodology, river segments which meet the free-flowing thresholds and have at least one feature of regional significance are eligible for inclusion to the Wild and Scenic Rivers Program. When considering which surections of a river are eligible, be mindful of the fact that rivers are inserrelated systems and that maintaining the integrity of the entire river, or at least major portions of it, is important in accomplishing the purposes of the Wild and Scenic Rivers Program.

The rationale for this approach is explained in steps 1-7 above.

The product of this affor its a resource evaluation report (or a resource evaluation component of a larger study report) that either determines slighbling or provides all necessary information for the agency in charge of the study to make this decision. The report should clearly identify 10 the features if way, that quality as outstandingly remarkable, 2) the sections of the river that pussess these features, 3) other noteworthy resource features that should be given consideration in future management, and 4) the rationale for decisions.

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NATURAL FEATURES

T-se of Frague

Hydrologic

Vageta

A highly unusual gorgo, e.g., one formed by something glacies.

A ratio shoreline (a shoreline formed by an ancient river, set, or lake but sow well above mater).

A rare type of bog og a domed postånd with a river russing through it

Ap unusual combination of river related surficeal features. The despest garge in a region.

The only glacio-sparses dates or caker in a region. Solution caves in a region where they are uncommon.

A twee with unusual flow characteristics e.g. high summer flows in a rappos where these are rare.

Boding springs (Springs with artesian pressure that makes them seem to bool)

A highly anesual waterfull, e.g. one that flows sliber under or both over and mater a rock arch, depending on flows

Exceptionally clear water.

Hatten of substantial value to threatened or codangored plant 1900km.

A highly unusual weekand for the region, n.g., a large total freshwater wetland in the

Text book examples of common features e.g. as expensally good exposure of a common bedrack formation showing typical features.

Exemplary

old agod stress candered) in a region

Appendix B

Examples of factors (or criteria) to be considered in preparing comparative reports

Anadromous Fish

- 1. Habitat Quality: The amount quality, and carrying capacity of babitat presently available for anadromous fish of all species-spawning, nursery and holding areas were
- Diversity of Species: The number of anadromous species presently established in the river. This includes both native and stocked species.
- Value of Species: The relative value of species present based on commercial, tribal
 and sport uses. Steelhead and spring chinook are understood to be the most highly
 prized by anglers. Spring chinook are highly prized due to scarcity.
- 4. Number and Size of Runs: The number and size of runs currently established on the river in question. Many species have both spring and fall, or nummer and winter runs, larger runs were rated higher than smaller coses. Run estimates were developed by combining the sport and trible statches with escapement estimates. These were averaged over the time period for which data was available, usually the past ten years.
- Natural Reproduction: Areas with self-sustaining natural populations were rated higher than those maintained by stocking.
- 6. Size and Vigor of Fish: Rivers with larger fish and/or high fecundity ratings were given greater value.
- Recreational Importance: Rivers with higher reported sport and tribal catches or high angler day estimates were rated more favorably than those with lower use.
- Historic and Present Significance to Native Americans: Rivers which have substantial
 ensiting use or which have been traditionally utilized as an Indian fishery stud/or have
 been documented historically for sizeable runs were rated higher than those which were
- Potential Significance: Many rivers have under-utilized babitat. Those rivers with habitat potential to support larger runs rated higher than those with little capacity for expansion.

- Character/naturalness: Pristine quality; level of wildness/remoteaces; extent of undeveloped area. Areas with the least development rank highest.
- Scenic quality: Presence of panoramic views and other scenic qualities. Areas which are the most scenic rank highest.
- Flow/volume: Average daily discharge in cubic feet per second. Areas with the greatest flows rank the highest.
- Level and type of use: Amount of recreation user days/ visitor bours; type of bosting/floating done. Areas with more use rank higher.

Recreation: Extended Trip Spating

- Length of season: Number of weeks/months and time of year river is navigable to
 appropriate whitewater craft; amount of time river is boatable at reasonable flows.

 Areas with a long season rank higher.
- Class/difficulty: Level of difficulty encountered based on international rading class I-VI; frequency and quality of rapids (gradient). More difficult areas rank higher.
- Length of nun/rivet segment: Actual length of mavigable river smalleble to recreational river numers or average time required to boat the segment (length of trip possible).
 Longer runs rank higher.
- 4. Accest: Ease of access (put-in and take-outs accessible by road; availability of public or private access points/easonated facility development; proximity to population waters: number of safety hazards both natural and man-pasde which may effect access/uso. Areas with the desjets access rank higher.
- Character/naturalness: Prisme quality; secule quality; level of wildness/remoteness; extent of undeveloped area. The least developed areas rank highest.
- Seenic quality: Presence of paneramic views and other scenic qualities. The most seenic areas rank highest.
- 7. Flow/volume: Average daily discharge in cubic feet per second. Areas with the greatest flows reak highest.
- Level and type of use: Amount of recreation user days/ visitor bours; type of boating/floating dode. Areas with the most use rank highest.
- Associated recreation opportunities; Number of areas/piaces available for overhight campung, both developed and undeveloped; fishing; bleing; viewing wildlife or uniting pounts of interest. Areas with the greatest diversity of opportunities rank highest.

Vegetation

- Socio-economic importance: Importance of the bard dependent on the wintering area
 to hunters. Areas which are the most important rank highest.
- 2. Naturalness: Areas with the least conversion to agriculture and development tank the highest.
- 3. Disturbance by man: Areas where wintering door are the least disturbed be activities like snowmobiling rank highest.

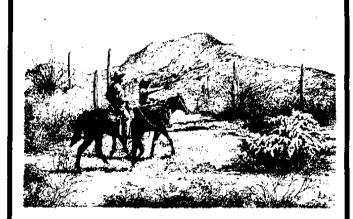
Gorges and Canyons

- Depth: Average depth of gorge/canyon from rim throughout its length. Deeper gargets or canyons are rated higher.
 Depth to worth ratio: Average ratio of depth to width throughout the length of the gorge/canyon. The higher the ratio, the higher the rating.
- 3. Length: Length of gorge/carryon. Longer gorges/carryons rate higher.
- 4. Flow: Average volume of water flowing through the gurge/carryon. Greater volume warrants higher rating.
- Hydrologic features: Number, size and extent of falls, rapids, unfutience etc.; number and size of springs and waterfalls associated with side streams at their confinence with the gorge/canyon.
- 6. Bedrock features: Extent, significance and/or uniqueness of genlogic features found within the gorge/eanyon.
- 7. Naturalness: Pristage quality of area; amount of development.

Scenic Values

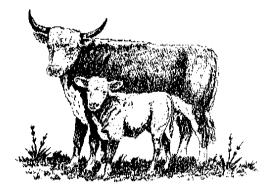
- 1. Adjacent Landform:
 - High Value = High relief, e.g., cliffs or spires; severe surface variation, e.g., badlands; strong sense of enclosure.
 - Moderate = Steep ⇔nyons, messe, buttes, or drumlins; interesting erosion patients.
 - Low = Low rolling hills or flat valley horrows.

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7. Cultural Modification

- High Value = Free from aesthedrally undesirable sights and influences; any man-made features that exist add considerably to visual appeal.
- Moderate = Man-made features may be visible but are not disruptive.
- Neutral = Sessic quality is somewhat depreciated by inharmonious intrusions but not so extendedly that they are negated.
- Negative = Modifications are so extensive or dominant that seeoic qualities are substantially reduced.



BUXEAU OF LARD MANAGEMENT PUBLIC BEARINGS: "WILD AND SCENIC RIVERS 1994 LRIS BEARINGS"

> Taken in Tucson, Arizone May 23, 1994

Prepared fort

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Reported by:

BUREAU OF LAND MANAGEMENT MELISEA J. WART

BARTELT & KENYON

Arizons, before MBLISSA J. MART, a Notary Public in and
for the County of Mericopa, State of Arizona.

LARRY BAUER
Apizume Burnau of Land Menagement
Deputy State Director for the Division of
Minerals

PHYL MORBLAND
Arizons Bureau of Land Management
Chief of the Dranch of Planning,
Environment, Lands and Recreation

BUXERU OI LAND HANAGEMENT PUBLIC MERKINGS "Wild and Scenic Rivers 1994 LEIS Bearings"

commenced at 7:00 p.m. on May 23, 1994, at the Udall

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MR. BAUER: Ledies and quantiemen, this meating will now mome to order. I have a few introductory comments to make before I well upon anyone who wants to mpask. My name is tarry Bauer. I am the Arisons Bureau of Land Management Daputy State Director for the Division of Minerals. I have been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior.

On my left is Phil Moreland, Chief of the Branch of Planning, Environment, Lands and Recreation in our state office. Later I'll ask him to summarize what we have done so far in this legislative wild and scenic river process. And I'll also introduce Mr. Jessie Juen standing in the back, our Tucson area Resource Manager here. On my left is Melisan Mart. She is an official court reporter who will record averything here. She's from the firm of Bartelt and Kenyon Court Reporters in

I hope each of you has signed the attendance wheat. The attendance sheet allows you to indicate whether you want to speak tonight or submit written comments. If you didn't sign as you came in and you want to speak, raise your hand and we will see that you get a change to sign in. After this introduction I will

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call on those who've indicated they wish to speak.

This public hearing is required by statute. The purpose of this public hearing is to receive comments on the draft Arizona Mild and Scenic Rivers hegislative Environmental Impact Statement. A transcript of this meeting will be made by the official reporter, Ms. Hart. The transcript will be reproduced in the final legislative environmental impact statement along with appropriate responses by Bureau of Land Management officials. The final wild and scenic rivers legislative environmental impact statement will also include public letters and responses to those and will incorporate any revisions or changes resulting from the comments at this meeting and from other public reviews.

We enticipate that the final legislative

We anticipate that the tinal legislative environmental impact statement will be available for public review in Decomber.

This public hearing is part of our efforts to involve the public in the preparation of this environmental document. We officially started the process with a Nobice of Intent published in the Federal Register on February 19th, 1993. The Notice of Intent included a statement encouraging the public to submit any issues or concerns to us. During March and April of 1993 we held 13 public scoping meetings in Arizona towns

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and communities and we held one additional hearing or meeting in St. George, Utah. Approximately 500 people attended these meetings. In early April 1994 we mailed out nearly 2,000 cuples of the draft legislative environmental impact statement for public review and comment. We will accept comments on this downwent until July 8th, 1994.

As I mentioned, the final legislative environmental impact statement will be ready in December. There will be a 30-day public review and comment period for the final document. After the final public review period the State Director,

Mr. Momencrantz, will send the environmental impact statement to the SEM director in Machington. Then it will be transmitted to the Secretary of the Interior who will forward it to the President. From the President the environmental impact statement will go to Congress which will make the final decision on which Arizona rivers will be included in the National Wild and Scenic Rivers System.

Finally, before t call upon Phil, I'd like to specify the ground rules for this public hearing, it's important to emphasize it's not a debate or a question and answer period. It's not a pross-examination by the public of the BLN. It is

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rather an advisory hearing in which the public is given an opportunity to make comments for the record. These comments will eventually be submitted to our Machington office and from there to the Secretary of the Interior, the president and Congress.

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BIM personnel are not expected to respond to questions during the meeting unless I rule otherwise. After the meeting, we'll be available in the back of the room around the maps to talk with you individually or you can contact us later at our offices. All epsekers should be allowed to complete their presentation without interruptions. If we have time, I will open the meeting to general comment after all the speakers have finished. As I mentioned, Phil Horeland will briefly summarize what we have gone through in preparing this legislative environmental impact statement.

MR. HORELAND: Thank you, Larry, and good evening, ladies and gentlemen. There are three items that I want to mention in summarizing the development of this legislative environmental impact statement. The first item concerns the purpose of the document. Existly, the purpose of the legislative environmental impact statement is to provide Congress with a database and elternatives which they can use to decide which, it any, rivers should be included in the Metional Mild and

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Scenic River System.

The Arizons HLM developed the legislative environmental impact statement in nompliance with the Wild and Scanic Rivers Act of 1968 that requires federal agencies to study potential national wild, scenic and recreational river gress.

The main consideration in this environmental impact statement is the range of management alternatives. In the statewide document — this is the thin document of the three-document series — we analyzed the impacts of implementing four different alternatives. One was the proposed action to recommend 13 river study areas to Congress for inclusion in the national wild and scanic river systems. Another was the no action alternative, which means that BLM would not recommended any river areas to Congress. The third alternative recommends to Congress only those portions or segments of river study areas that are not protected by wilderness or national conservation area status. The last alternative recommends all 20 of the river study areas

Necond, I want to summarize the stape that took place in the process of producing of this legislative environmental impact statement. Over the past several years, BIH has developed resource

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management plans and plan amendments that involved evaluating rivers to determine whether they should be considered for wild and scenic river status. Through these plans about 20 river study areas were identified and determined to be sligible for consideration. While BLM was doing this, the Arizons Rivers Coslition, in March 1991, studied and recommended 40 Arlsons rivers for wild and ecenic river consideration. Pourteen of these were under NAM management responsibility. In 1992, the Arizona Congressional delegation encouraged BLM to develop additional studies to facilitate the process. This resulted in a detailed document known as the Wild and Scenic River Assessments completed in September of 1993.

The Wild and Scenic River Assessments document contained an avaluation of each of the 20 rivers BUR districts had identified as eligible in the planning process. Although the assessment was developed primarily for internal use, copies were sent to the Congressional delegation and several interested parties.

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the three-part system, each individual river has its own minienvironmental impact statement and each of those has at least two alternatives, the proposed action and the no action electrative. Some of these individual downments have a third elternative, recommending either the entire river study area or a portion of it. The draft LEIS was produced during the fall of 1993 and the apring of '94 and filed with the Environmental Protection Agency and released for public review and comment on April Sth, 1994.

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Finally, I want to talk a little about public involvement. We in Arizona strongly believe in a full public participation process. In this case, our public involvement efforts started with the resource management plans and plan amendments. We encouraged the public to identify lesues and concerns that needed to be considered in planning. We sent the documents out for public review and comment and revised them accordingly.

When we decided to start preparing this document, we announced our plans in the Federal Register, in local papers. In the announcement we asked for public comments. In March and April of last year we had 14 public ecoping meatings throughout the state and At. George, Utah. Over 500 people attended the meetings and many sent written comments to us. By the way, these

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comments are summerized in Chapter Five of the statewide rivers document. That's the smaller of the three dooupents.

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We've also mailed out three issues of our wild and scenic river updates to over a thousand people who have asked to be on our mailing list. These updates have kept people informed about the process and our

meet month we started enother important phase of public involvement -- this public hearing is part of it -- the public review and comment process on the draft document. We're very anxious to know what you think about the wild and scenic river alternatives. Rech communt we received tonight and any other comments we receive until July 6th will be carefully read and responded to as appropriate. The public comments may result in changes to the document. The comments and responses will be published in the final document, and they will all be sent to the Secretary of the Interior and forwarded to Congress to aid in making decisions about adding rivers to the national wild and econic 21 rivers system.

I will give it back to Larry now. As he mentioned, this is a formal public hearing and isn't m constion and answer forum, so I won't ask for any

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questions at this time. But I and several of the other people who helped prepara this document will be available after the meeting if there's something you would like to discuss with us.

MR. BAUER: Thanks, Phil. Statest people have indicated they'd like to apeak tonight so I'm going to allogate a maximum of ten minutes per person at this time. When I call on you to speak -- we're going to set up a microphone here for you to use. Please state your name, where you're from, who you represent or if you're speaking for yourself. Those who have come with written statements can leave them up here with me after they have finished. And I think it would be better if the speakers face the audience rather than the table when they're doing the speaking.

The first person I'd like to wall, and $\boldsymbol{\epsilon}$ have a question mark there, is Gerald Korta.

MR. MORTE: You may this jen't a question and enswer. I came with a question and I will make a commenc. I was affiliated with the owners of the Gjenega Creek Empire Ranch from 1947 to 1968, in which I was the current panager, and we sold the Cionaga Rauch. I keep hearing that these fish are native to Cienequ Creek. They are not. Those fish were never there. Sam Bell, who bought the ranch trom John Greenway in 1968,

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moved the oresk, moved it around by the ranch headquarters, dumped it into Maddey Canyon, built a dam on Cienega Creek and stocked it with fich. And I'm not $\operatorname{disputin} q = 1$ know nothing about fish except there are figh. These might be a native Arizona field, but they were not native there from 1947 until 1968 when they were introduced by Sam Rell. That's all I've got to say if I can't ask any questions. So you're talking about the Cienega Creek is a native fish habitat. It's not-It developed into one, but prior to 1969 or '70, there 10 11 was no fish in the creek. 12

MR. BAUER: Thank you, Mr. Korte. Our next epeaker im Mr. Stephen Ondrich.

MR. CAPRISH: I will pass right now. I will talk to you later.

MR. HAUER: All right. Wheel Tetreoult. MR. TETREAULT: My name is Rheal Totreault. I'm from Tuckon. I'm with the Tuckon Rough Riders, & four-wheel-drive club here in town and the Arizona state Association of Four-Wheel-Drive which, which are clubs all across the state. We oppose the wild and scenic rivers proposals just because of the fact that it amounts to nothing more than an expension of wilderness. whether it's called a wild and scenic giver or a riparion, conservation area or wilderness, the and

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result is the same. The deneral public is looked out of way out, there was a eign that said "The land of many the recreational opportunities available in these areas. T4-3 uses." I would like to make sure that it continues to Only the elite with the time and the physical abilities be a land of many uses. to hike these areas will be allowed to use them. The NR. BAUERI Richard Thompson. elderly and disabled are disqualitied. MR. THOMPSON: My name is Richard Thompson. We don't need any more wilderness in this Currently I live in Tubson. I am affiliated with the state or in this country for that matter. We can't Tacmon Rough Riders. Gince I have been in Arizona for afford to properly administer the areas already in parks 20 years I have been in Elaquan, I've been in Sefford, I and in wilderness ereas. As our population grows, the have been in Araveipe. I love the outdoors. I agree need for recreational opportunities does also. To with the Tucson Rough Riders. Don't keep the general T4-4 continually shut down areas by turning them into public out. The BLM needs to control these areas, 12 wilderness will only create more and more problems in that's open to the public. I don't think they need to 17 the areas left open. The more concentrated the dears. 13 1.3 be shut to the general public. Thank you. 14 the higher the possibility of resource damage. Keep 14 MR. BAUBRI For the next person I have an X 15 public lands open for the public to use and do what is 15 that was erased, but we will ask. Pauls Arnouist? No? 16 good for the general public, and choose the no action 16 Okay. The next speaker will be William Ellett. 17 alternative. Thank you. MR. ELLETT: Bi. I'm William Ellett. I am 27 18 MR. BAUER: Thank you, Mr. Totroault. Our a hydrologist here at the University. I'm speaking for 18 19 next speaker is Phil Kleiman. 10 myself. I'd like to see Cienega Creek kept on the list 20 MR. ELEIMAN: I am also with the Torson and the resson for this is because the Endangered 21 Rough Riders. We are talking tonight about closing out Species Act could some day be modified by Congress and 21 22 a lot of people from a lot of land. I'm against that, weekened and so that level of protection by including 22 T4-5 23 Just vesterday we were in the Coronado National Forest Cianega Creek on the list could help in the future. 24 doing a small part to help keep the trails upon. We Also I'd like to urge the SDR to go with their proposed

spent the day picking up other people's trash. On the

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action to try to protect what is laft of Arizona's

free-flowing streams. Thank you. MR. WAUME: The next eneater is Kevin Dahl. 2 HS. BSHAY: Thank you. I'm Martha Bazay. I MR. DREL: Thank you, Mr. Chairman. Thank live in Tuoson. I am a member of the Sierra Club. I you for this apportunity to present my views. I'm Revin serve on the Audubon Conservation Committee, and I'm Dahl, speaking for myself, and when I think of Arizona also a member of the Arizona League of Conservation rivers and creeks there's a personal amecdote that comes Voters, and I would urge very strongly that Cienega T4-7 to mind. My niece, who lives in the Northwest, is Crack be placed on your list of waterways to be given visiting my father, who lives in Phoenix, for the first some consideration. I regret that is not presently on time and they were driving over the Salt River and it there. I'd like to see it classified as a sound area. 10 was during one of the few times when the flood waters 10 We are happy that that area is now included in a were coming down through Salt River. And my father was 11 preserve, but that doesn't guarantee that it will always 12 so proud and so excited to show it to her. Look, 12 be left that way. I'd like to see more of a quarantee 13 Alexandria, the river's running. And she said, silly, that it will be kept. It is one of the few remaining 13 Grandpa. Rivers always run. But not in Arizona. And areas of natural cienegs, with year-round water that 14 we have lost way too many civers and way too many exists in Arizons. And it would be a shape if we were 15 16 creeks. That's why I personally support the proposal to lose that, that treasure. I would urgs strongly that 16 for the wild and scenic river designations, with the one 1) that he reconsidered and given a scenic designation. T4-6 exception, with the Inclusion of Cienega Crask. I have 18 Thank you. been there for a comple times. It's just a marvelous 19 MR. BAUER: Our next speaker is Bob Reatson. 20 area. Because it has some readily accessed areas I MR. BEATSON: My name is Bob Restson. I'm 20 21 think it needs a little more attention. I have seen 21 here tonight representing the Arizona League of 22 illegal firewood cutting there because of the easy Conservation Voters. Cienega Creek is the best and one T4-8 23 access. And I think it strongly deserves scenic of the last remaining cienegas in Arizona. We feel it 24 designation. Thank you. deserves long-term legislative protection and that's MR. BAUER: Our next apeaker is Martha what the BIS is all about, or what the scenic rivers act BARTELT & MENYON BARTELT L KERYON

is all about. The unique combination of wildlife, flors, antive fish and pristine ground-red water provides southern Arizona with a rare solf-contained ecosystem. Referring to the BLH's own literature on this riparian area, there are opportunities for hixing, camping, horseback riding, photography, painting, birdwetching, bicycling, pionicking and hunting as a few of the possibilities. Yet the BLM in their assessment dld not find one of the outstanding and remarkable values to be represtion. Well, the list that I just gend, if those are not recreational, I don't know what

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Next, we'd like to briefly say that a cienega, once far more common in the desert, almost by definition is a unique water habitat. In a desert you have very little water. A pienega, spring-fed, ground-fed riperies area is very scarce now. They used to be far more commun. We would like the BLN to consider this in their sessement, to resvaluate that and include that we one of the outstanding, remarkable values and unique water habitat. In closing -- and wa plan to present more formal comments in writing at some 23 | future time to address the entire BIS -- we urge the BLM to reconsider Cienega Creek for designation as suitable for the Wild and Scenic Rivers Act and that it be

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classified as scenic-

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mg. Aauka. Thank you. Our next epeaker is

MR. ZETIMAN: My name is Tom Zeilman. I'm from Tucson. I'm just representing myself. And I have been to Cienega Creek and I have seen the wonder of it, the diversity of wildlife there, especially the plant life and the fish that I have even there are very unique. I manelly think, and most people do, think of the desert as just being this very dry, arid area with just cactus and very dry, arid plants. But when you go to Cienega Creek, you can actually see that it's a swamp 17 there, and that's a very yers thing in the desert. And the fact that you can actually see different types of 14 fish swimming around in a swamp and different swamp creatures in, you know, what is basically just a marsh, 16 with horsetalls and deer gross and different plants 17 there really amaged me. I never really had seen that 10 19 kind of desert habitat before and I definitely am in favor of keeping Clenega Creek on the list to make it a 20 ecenic river in Arizona under protention. And I think 21 that it is correct that it is an eres that does have 22 23 represtignal opportunities, and we were not shutting people out of Cienega Creek by designating it a scenic 24 25 river. That's really an incorrect designation, an

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incorrect assumption that people make, and it's definitely something that more people should understand. Thank you.

MR. MAUER: Our next speaker is Charles

MR. MANOLAKIS: Thank you. Hello there. My name is Charles Manolakis. I'm here representing one of the great parts of Tucson. Some of our elderly people that are disqualified for the wildernoss. I have been known to run a 55-440 and run marathone. So 7 don't feel very disqualified. I'm not talling you what age

Anyway, we have listed what sounds like an emotions) appeal, and it is an emotional appeal, but I think it speaks to the facts of life surrounding this issue that's benneming with us now, and expands to some areas that we really haven't gotten into. This is what we have to say. So, so many of our beautiful rivers and riveries areas have been wanted because of unimbibited, obtrusive, destructive development and uses and the 21 various pollutions that has caused and choked and polluted our rivers and our riperian areas into dying and death. It's time for, we feel, for humankind to realize that the meaning of, "You are to have dominion over the marth," does not mean that you are to conquer

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the earth, dig it up, tear it up or choke it and eventually destroy it as we have been doing, and as we have done to 90 percent of our riperies arese here in Arizona. As a matter of fact, of life. Rather it must be realized that the Greek translation means to be a loving, nourishing paretaker of the earth. So, therefore, we must reserve the little we have left. Never mind fooling around with mother maters. Let it be realised and kept in mind that the Great Architect, the Creator of the earth and universe said -- I didn't sav it, He said it -- destructors of the earth, behold, for 11 they shall seek dagmation. Let us keep in mind the 12 rivers are the symbolic representation of all that is, was and is pure and good and powerful and spirited 14 within our country and about our country. Let us keep 15 in mind that in a recent survey, only a relatively small 16 percentage of Americans said they would become involved 17 in Bosnia or North Rores, but 96 percent said that they 18 would want to become involved with preserving the 19 environment in other countries as well as in our own. 20 So let us make this wondrous professional commitment to 21 a sais environment to live in, right here in the center 27 of the life flow of what we have all about us. Our 23 rivers: let us save our rivers and our precious creek, 24 Cienega Creek, from all the destructive development of 25

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the past. So we may we went all 20 erose seved, as woll Nogeles, Monoits and the surrounding communities are T4-10 2 as Cienege Creek. This is our representation of what erowing substantially. Our outdoor recreational needs we feel should be. And let us be the loving, nourishing are growing also. Madera Canyon has seen a foor-fold caratakers of the earth that we ere supposed to be and incresse in usage in ten years. Mabino Canyon sees 1.2 million visitors a year and it's growing. Wa're overseing many of our riparies areas, destroying MR. BAUER: Our next speaker is Andy wildlife corridors and the unjugment of other humans in MR. INVENTORCE: I'm from Tuccon. I have a the process. Only an approximate four percent of short statement. First of all, I also believe that the Arizona's riperian habitate are still in existence. We public should not be prohibited from recreational use of 10 must protect these (ew fragile areas we have left. Cleange Creek. You know, in over 70 years of 11 11 pressionally hiking down Ciepega Creek, the fragility of 17 12 ME. DAUGH: Our Best speakers on the list the small oasis hee slways impresend on. As the few are Mr. and Mrs. M. Denniston. I don't know if you both 17 1.3 remaining year-round flowing creeks dwindle in southern 14 14 went to speak or --Arizona, it is time to value and protect that that we 15 15 MR. DENNISTON: I think it's fust for mehave left. There are mining interests very close to 16 16 the signed us both in. Cienega Creek, and for this reason as well, time is of 17 17 MR. BAUER: And your first name, sir? the essence, that the BLM protects other acenic MR. DENNISTON: Moody. My name is Moody 18 T4-11 ciepagam, Cianaga Creek itself must be protected and, Denniston. I live here in Turson. I think I want to 19 therefore, included in the BLK's national wild and speak for my grandchildren, if that's okay. Every year 20 scenic river system. Thank you. 21 21 the requirement and need for additional recreational MR. BAURR: Our next speaker is Wendy space in our public lands increases. This is due to an 22 22 2.3 Increase in the population and continuing movement of Marque. 2.3 MS. MARCUS: I would like to speak in favor people to our metropolitan eress. Yet in apite of this T4-12 12° 24 of keeping the Cianega Crack on the list. Tucson, continuing increase in mead, every year we see more and BARTELT & KBNYON BARTELT & KENYON days ago returned from Los Angeles, which is where I was more of our public lend closed for recreational use. born, and when this gentleman before me was talking The result is higher concentration in the allowed area which leads to more danger to the participants and much about paved roads and gange and children playing in greater damage to the land. Every year new names crop areas of high density urban, I thought, well, if you look on this map there are no rivers designated, very up. Wilderness areas, major conservation areas, sand few, if any, in southern Californie and none in Los wash dust control, wild and scenic rivers, riperies area Angelos. And I think that with the propensity for our protection, endangered species protection. The list multure to believe that human belows can live by money goes on and on. Folks, unless we wake up and get our and by tachnology, we're going to find more and more heads thinking straight, more of our public land will be root problems like genge and high urban concrete. 1 converted to natural parks with paved roads, paved perking, tourist guides and other facilities to aqueers live at Sabino Canyon. I don't know if the people here are sware that at Repareto Eprings -- there's five dellars, not only from us, but mainly from formign 12 springs feeding the riparian area shout maybe a tenth of tourists. Public lands will be closed to recreational 13 a mile mouth of Sunrise, and that area will moon be 14 use. Private landowners will lose control of their 14 ripped out by our own water company here in Tucson. It land. Recreational activities will be limited to 15 15 has no protection whatsnever. And I strongly encourage designated areas within our city's paved lots. Our 16 16 our government, as such as an anarchist as I am, to grandchildren will play on paved playgrounds, fall T4-14 18 protect whatever is left of our wildlife, including 16 victime to druge, gange, and our congested cities. Is rivers that they have and the Cienege Creek, if it's not T4-13 1 19 this what we want? I strongly support the no action alternative. If you'd include this, I'd appreciate it. on the list. I think there's very little left, and 20 water kidding ourselves to think that human beings and MX. BAURRI Does anvone else wish to speak? 21 21 concrete and technology can live without nature. Thank Okay. Lat's see, Pluage remarker to state your name. 22 22 MS. SCOTT: My name is Earen Scott. I have 23 23 24 lived in almost every part of this world through my 24 MR. BAUER: You, air. MR. PRIDRICE: My name La Bront Pridrich. I life. And I thought it was interesting that I just two 25 DARTELT & KENYUN HARTELT & KENYON

am as avid outdoor person. I spent this weekend in Placetaff. We wife, my minter and my brother-in-lew and I started at 9:00 a.m., Saturday morning. We went out all the way to the top of Rount Bumphries. So 1 understand and I employ all aspects of outdoor represetton. I am also effiliated with the Tucson Rough Alders. I find that the ideas and the purpose of the organization isn't to go out and play Led Lapplin as loud as we can end throw beer cans in the desert. That's not what off-highway vehicle use is about. It is 10 about seeing things that are difficult to get to for 11 some prople. If I had three days to hike in, I'd be 12 happy. I don't have three days. I have Sunday 13 appetimes. We have several members in our club, one who 14 has one leg who drives a Jeep. We have an older man 15 who's waiting for an organ transplant. He's a regular 16 on our trips, on day trips. And I think the root of 17 this problem is ground water. It's not what is going on 18 19 up on top. There's an article in the Arizona Star Loday about Sierra Vista's Coming problems with growth and 20 21 pulling down the water table. Dosen't matter what we do 22 on top if they pump it out to use for urban whatever. 23 There's not going to be the water there. People need to concentrate on wise use of water, cartainly. Fewer 24

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lawns, things like that. But it shouldn't be let's keep

people out in a vahicle. There has to be room for everyone, whether you like to walk, hike, climb, ski, whatever it is. You should also be able to drive in some areas. Now, I'm not eaving you should open up every single wilderness and put a trail through there That's not what this is about. There has to be noom for everyone. I don't think to designate a river se wild and scenic is going to further that cause. That's It.

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NR. BAUER: Any more on this wide of the room? Okay. Back row.

HR. MARCUS: My name is Ken Mercus. I abent a lot of time in the Empire Cienage and I know it's An important watershed. It's an important wildlife area. It's an important ecosystem, and it's an important regreational area. I believe that the BLM has to balance between all of these. I believe it should be protected, but we also should have limited and well-thought out access. And I think if anybody's been down there, they notice there's large areas of erosion and there's areas where there's vandalism. And then there's also beautiful areas that haven't been disturbed. There's seequite bosques and cottonwood gress. So I think the BLW should put Cienega Creek on the scenic wetlands, but I also think that they should

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also take into consideration that we have access so that the public can enjoy those beautiful wetlands.

MR. BAUER: Yes.

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MR. GOODENOUGH: My name is Chris Goodenpugh. I'm speaking on behalf of myself. First of all, seems like there is a little bit of confusion on our part. Maybe the BLM should answer or get rid of the confusion. We're all saying how we want to use this area. Lot of people are saying they want their kids to he able to use it. I'm saying I want to be able to use it. The Rough Riders, they want to use it. We're all saying the same thing. But we're saying no and yes to whether we want to protect it. Maybe there's a misconception on what protection really is because I'm not fully aware of exactly where you draw the line on how you're going to be able to go into the area if it's under the Wilderness Act. Right now I use the area. I go camping there, hunting there. I take my family on picnice. So I drive in in my four-wheel drive on the roads. I get out when there's no road, and I go hunting. There are some areas down there where there's some very large trees, one of them about five foot

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around. We go down there with the family. We got

pictures of my kids and the trees. We use that erea

quite frequently. But we drive to the area because

there is a small road. So I think we're all -- maybe there's miscommunication or some confusion. We all want to use the area. I think that RLM needs to make it understood on what the designation will mean and what it's going to provide for us. Because a lot of us are saving kind of the same thing.

The second thing, I just want to state that I think it meds to be protected because I want to use the area in the future. I don't went in enother 10 or 15 years that to turn into Sabino Canvon where you're color to have to pay and park to take the tram through the area. I think if it's designated as a wilderness area, at least my hope is, that my family and my kids when they grow up will be able to go down there, that I'll be able to hike off the road, drive up to an area and hike, go do some hunting and see some wildlife. So it you can please clarify, either in the meeting or however you can, because I know we're eaying the same thing, but we're not sure on whether to say yes or no. I'm not surn. I came here to say yee, but after listening to this, I'm not sure which is the right way. I just know I want to use it. I don't want vendalism; I don't want it trached out. I'd like it to stay as it is besically right now. So if you could clarify, I think that would help us all out. Thank you.

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MR. MAURE: Mr. Goodmongh, Phil's going to be available when I's going to no when we finish with all the speakers, I's going to call a recess for a while just in case anyone else copes in, and you can talk with whil and with Jessie and other Simers. And then if after we have probably recessed a half hour or so just to make sure nobody else wanders in, I'll probably call the meeting back to order and if anyone size has any more nomments at that time before I adjourn it --

MR, GODDENDUGS: A quick synopsis might help
us all out; what would happen if yes and what would
happen it no. If we're contused -- I think a lot of
people are.

MR. BAUER: Are you prepared to do that?

MR. MORELAND: No.

MR. HADER: No? We warm not prepared to do that. I'm sorry. Apparently my expert tells me that.

MR. MORBLAND: It's not a short enswer. But we'll get you the mnewer.

MR. BAUER: Obviously, the EIS, when we work out the final, that particular point needs to be clarified. Okay. We will make a note of that right now. X'm going to call on Steve Ondrish. You had your hand up a little while ago.

MR. ONDRIBE: I listened to all you folks

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expound on your verious activities and what club you belong to, what you do. I belong to a recreational prospecting mining group. Now, we have a set of bylaws that -- which you adhere to it. You go out in this area; you obey the rules. These folks are setting up comething for future posterity. Now, we can either have it that way or we can have it like Sebino Canyon, which I haven't been up there in 15 years since they put the fee on. And I won't, for the simple reason there is enough areas in Arizons you can go to and enjoy yourself, but behave yourself. This group I belong to in the Demert Golddiggers. First thing people think we are tearing up the countrysida. No, we don't. We have our own claim; we do our thing and we abide by the rules.

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Now, it depends on how you will take your responsibility as an individual. You just can't go out there and twar it up. The next quy wants to luck at it. And that's the way we do things. We go out to an area, we have our own claims "- and you can come with us. You can come to our meetings and see what we do. But for one thing, resember, you got a conscience. Obey it. Thank you.

MR. JIMMERFISIO: My habe is Shane
Jimmerfield, I'm with the Student Environmental Action

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Committion, and we would like to see Cienaga Creek put on the proposal and for you to go forward with the proposal. That's it's.

MR, DAUER: Maybe we have enother one up front here. Okey-

MR. LUTE: My name is John Lutz. My wife and I are recent members of the Tucson Rough Riders and we've gotten to see quite a hit of the country recently wince we joined the Rough Miders. We go out and see nice places, places we haven't been to and places wa'd never get to see probably if we didn't have our vehicle. Most people want to go out and see them. The Rough Riders not only do that, but they do good things. They work on trails, pick up trash. At Reddington they were trying to get cere out a couple months ago. If you go up to Reddington you'll find there are fower vehicles there. I think we all want access, but we all have to have a conscience just like the gentleman eaid. If you go out there, you take care of it. I don't want the government taking envilling away from me. It's kind of like taking a jawal and putting it in the eate and never seeing it again so nobody else can see it. We all went to use it, but we all got to take care of it.

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to apack right now? Two more? Okey. You, air.

MR. BAUBR: Is there anyone else who'd like

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MR. KREUTZ: My name is Al Kreutz. Outside of Jerry Korte, I don't think any of you her been down there, truthfully, and been in, out and around down there as much as him or 1. I have been hunting down there in and out sinus '57 when he was foremen down there for Greenway. Pancho and the boye tonk me all over. I built most of the power lines down there. I think the only reason I spoke is I have heard all the pros and cons, and I didn't hear anybody in here way what a good job that Jessie's done since we have got the Tuoson office of BLM and the staff is doing down there. I think they're doing good. I think the conservation district will give us all the protection that we'll need down there. I was down on the lower end of the Empire Cienaga conservation district last weekend. You can see by my arms. We removed four-and-a-half miles of the two bottom strands of barbed wire, put in a smooth strand for the antelope play. We moved another threewand-a-helf miles of fence an they can Yosk. I think I ame some of you people that want to preserve it and do momething -- there was an advertisement in the paper to get you to come out and help us true conservationists come down and do something. I think the BLM is doing a wonderful job. I'd like to compliment them. Thenk you.

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MR. BAUER: Yes, ma'am.

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MB. BLACK: My name is Mary Black. I'm from Mierra Vieta. I'll try to touch on a couple nointe that puople haven't mentioned. One gentleman mentioned Sierra Vista and our watershed there. We do have the potential for some problems for water availability in the future. But the thing that I think a lot of people are missing, and I like what this one gentlemen brought up, and I would like to stress that for you all in the future. The reason I'm here is more for my daughter and for her children. I'm a member of the Mereford Matural Resource Conservation District, and all of you folks are missing an opportunity to participate in a conservation effort throughout your watershed. If you don't take care of your watershed, you will not have your riperian arman. You've got to take care of that wetershed, and you guys are missing the boat. If you put this under wild and scenio rivers, that's not going to solve your problems. You've got to look at the big picture and what you have to take care of. And there's soveral conservation districts throughout Turson and southeast Arizone that you could all get involved in and there is new funding available through these conservation districts where you could do some conservation efforts. You can slow the runoff of your rainwater and your store

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water. It you slow down the water, you'll stop erosion, and you'll help the water Mechangs your agolfar. And that's one of the things that's very impultant, mapecially here in Tuoson, where folks have less mater than we do. So in order to protect your cleanage, I don't think you need to add more layers of buresucracy on top of what you already have. You have a conservation area. I grant you Jessie has done an outstanding job with what he's tried to do. But he needs help from you tolks, and conservation districts are one way you can all participate. Thank you.

NR. BAUSH: Did anyons slee wish to speak?
All right. At the present time I'm going to recess the menting. Our people will be available to chat with you around the maps back there, and we will probably have at least a half hour recess. The meeting is now recessed.

(A recess was taken)

MR. BAUER: At this time I'd like to call
the meeting back into session, and I will now ask if
enyone on the basis of any of the questions and answers
that they received to those questions would like to make
any additional statement or If you haven't spoken before
would like to make a statement. There being no one nimp

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who would like to speak at this time, then I bereby addough this meeting.

And I would like to first say that if you have not received a copy of the draft of the environmental impact statement and you would like to receive one, we have a sign-up shout back at the registration table, and if you sign that we will mail you one. You can always use it to hold down the ends of the coffee table or something. We're really looking forward to getting your comments if you have comments. You have until only the 8th, and I'll cand you the eddrews. The mailing addraws is printed inside the cover letter attached to the draft LRIS. Send comments to phil Noteland, Bureau of Land Management, Post Office Rox 16563, Phoenix, Arizona. 85011. Ka'am?

A VOTCK: Your flier mays it's 14.

NR. RAURR: Okay. If you go by the street
address it's 14, but if you go by the post office box,
it's 31. So without further ado, then I bid you good
night. I thank you for coming. It's been a very
interesting time.

(The hearing concluded at 8:40 p.m.)

BARTELT & KENYON

STATE OF ARIZONA)
COUNTY OF DIMA

BR IT KNOWN that the foregoing proceedings were taken before me, MBLISSA J. BART, a Notary Public in and for the County of Maricopa, State of Arizona; taken down by me in shorthand and thereafter reduced to computer-sided transcription under my direction; that the foregoing 35 pages are a true and correct transcript of all proceedings had upon the taking of said proceedings, mil done to the best of my skill and ability.

I FURTHER CERTIFY that I am In no way related to any of the parties hereto nor am I in any way interested in the outcome horeof.

DATED at Tucson, Arizona, this 2nd day of

-merson & (Johnst

20 My commission expires: 21 October 31, 1995

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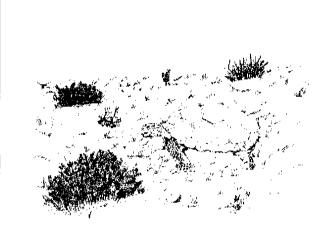
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Stapper Ordinal 3331 8. Small turn: #2 55730 2226 BUREAU OF LAND MANAGEMENT PUBLIC BEARINGS

Taken in Thatcher, Arizona May 24, 1994

Prepared for: BURRAU OF LAND MANAGEMENT

Reported by:

MELIESA J. BART

BARTELT & KENTON

SUREAU OF LAND MANAGEMENT PURLYC WEARINGS
"Hild and Scenic Rivers 1994 LEIS Bearings"

Unknowned at 7:00 p.m. on May 24, 1994, at Eastern

Arizona College, Little Theater. Thatcher, Arizona,

before MELISSA J. HART, a Notery Public in and for the

County of Maricopa, State of Arizona.

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LARRY BAVER
Arizona Bureau of Land Management
Deputy State Director for the Division
of Minerals

PHIL HUMBLAND Arizona Bureau of Land Management Chief of the Branch of Planning, Environment, Lands and Recreation

BARTBILT & KENYON

MR. BAUER: Good evening, ledges and quantiemen. This presting will now come to order. I have a few introductory nomements to make before I call upon anyone who wants to speak. My name is Larry Bauer. I am the arizona Bureau of Lend Management Deputy State Director for the Division of Minerals. I have been appointed by the state director, Les Rosencrantz, to conduct this public hearing under the authority of the Secretary of the Interior.

On my right is Phil Moreland, Chinf of the Branch of Planning, Environment, Lands and Represtion in the state office. Leter 1 will mak him to summarize what we have done so far in this legislative wild and scenic river environmental impact statement process.

Next on my right is our official court reporter, Melians Hart, from the Eartelt and Kenyon Court Reporting firm

I hope each of you signed the attendence sheet. The attendence sheet allows you to indicate whether you wish to speak tonight or to submit written comments. If you didn't sign in as you came in, plassed os now. After this introduction I will call upon those who have indicated that they wish to speak.

This public hearing is toquixed by statute. The purpose of this public hearing is to receive

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comments on the draft Arisons Wild and Scenic Rivers
Legislative Environmental Impact Statement.

The transcript of the meeting will be made by the official reporter, Ms. Bart. The transcript will be reproduced in the final legislative environmental impact statement along with appropriate responses by bureau of Land Management officials. The final wild and scenic rivers legislative environmental impact statement will also include public letters and responses and will incorporate any revisions or changes resulting from the comments at this meeting and other public meetings.

We anticipate that the final legislative environmental impact statement will be available for public review in December.

This public hearing is part of our efforts to involve the public in the preparation of this env)ronmental document. We officially started the process with a Notice of Intent published in the Federal Register on February 19th, 1993. That Notice of Intent included a statement encouraging the public to submit any issues or concerns to us. During March and April of 1993, we held 13 public scoping meetings in Arizons towns and communities and one in St. George, Utah. Approximately 500 people attended those meetings. In early April 1894, we mailed out meanly 2,000 copies of

the draft legislative environmental impact statement for public review and comment. We will accept comments on the document until July 9th, 1994.

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As I mentioned earlier, the finel legislative impact statement will be ready in December. There will be a 30-day public review and comment period for the final document. After the final public review period, the State Director will send the environmental impact statement to the SLK director in Washington. Then it will be transmitted to the Secretary of the Interior who will forward it to the President. From the President the environmental impact statement will go to Congress which will make the final decisions on which Arizona rivers will be included in the national wild and scenic rivers system.

Finally, before I call upon Phil, I want to specify the ground rules for this public hearing. It is important to emphasis that this is not a dubate or a question and answer period. It is not a prome-examination by the public of BLM. It is rather an advisory hearing in which the public is given an opportunity to make comments for the record. These comments will eventually be submitted to our Washington office, the Secretary of the Interior, the President and

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BLM personnel will not be expected to respond to questions during the meeting unleas I rule otherwise. After the meeting they will be available to talk individually or you can contact them later during office hours. All speakers should be allowed to complete their presentations without interruption. If we have time, after all those who wish to speak have spoken, I will open the meeting to general goments.

As I mentioned warlier, Phil Moreland will how briefly summarize what we have gone through in preparing this legislative environmental impact statement.

HR. MORELAND: Thank you, Larry, and good evening, ladies and gentlemen. There are three items that I want to mention in summarizing the development of this legislative environmental impact statement. The first item concerns the purpose of the document, Briefly, the purpose of the legislative environmental impact statement is to provide Congress with a detabase and alternatives which they can use to decide which, if any, rivers should be included in the national wild and scenic rivers system.

The Arizona BLM developed the legislative environmental impact statement in compliance with the Wild and Scenic Rivers Act of 1966. That act requires

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faderal equacies to study potential netional wild and

The main consideration in this environmental impact statement is the range of management alternatives. In the statewide document, which is the thinner of the three-part document that you received on was available at handout, we analyzed the impacts of four different alternatives. One was the proposed action to recommend 13 river study areas to Congress for Inclusion in the national wild and scenic rivers system. Another was the no action alternative, which means that BEM would not recommend any river study areas to Congress only those portions or sequents of river study areas that are not protected by wilderness or national conservation area status. The last alternative recommends all 20 of the river study areas.

Second, I want to summarize the steps that took place in the process of producing this legislative epvironmental impact statement. Over the past several years, Arizons BLM has developed resource management plans and plan amendments that involved evaluating rivers to determine whether they should be considered for wild and scenic rivers status. Through these plans, 20 river study sames were identified and determined to

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be eligible for consideration.

While BLM was doing this, the Arizona River Coalition in March of 1991, studied and recommended 40 Arizona river areas for wild and scenio river consideration. Fourteen of those were under BLM management responsibility. In 1992, the Arizona Congressional Uslegation encouraged BLM to develop additional studies to facilitate the process. This resulted in a detailed document known as the Wild and Boenic River Assessments completed in September of 1993.

The Wild and Smenin River Assessments document contained an evaluation of each of the 20 rivers BLM districts had identified as aligible in the planning process. Although the assessment was developed primarily for internal use, copies were sent to the Congressional delegation and several other interested parties.

We used the assessment document as the basis to identify the rivers study areas for the proposed action alternative in the environmental impact statement. However, each of the river study areas has at least two alternatives in the other two volumes, the two thicker volumes. Every river study area has at least two elternatives, the proposed action and the no action alternatives. Some of the individual documents

heve a third alternative recommending either the entire river area or portions of it. The draft LEIS was produced during the fall of 1993 and the spring of 1994 and filed with the Environmental Protection Agency and released for public review and comment on April 8th, 1004.

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rinally, I want to talk a little bit about public involvement. We in Arizons strongly believe in a full public involvement process. In this case, our public involvement efforts started with the resource management plane and plan appendments. We encouraged the public to identify issues and concerns that needed to be considered in planning. We sent the documents out for public review and comment and revised them accordingly.

When we decided to start preparing this document we ennounced our plans in the Federal Register and local papers. In the announcement we asked for public comments. In March and April of last year we had the public scoping meetings, and we held those throughout the state and in St. George, Utah. Over 500 puople attended these meetings and many sent written comments to us. By the way, these comments are summarized in Chapter Five of the statewide rivers document, again, the smaller of the three documents.

We also mailed out three issues of wild and

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scenic river updates to over a thoseand people who had asked to be on our sailing list. These updates have kept people informed about the process and our progress.

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Last month we started another important phase of public involvement — this public hearing is a part of it. The public review and comment process on the draft document is very important. We're very anylous to know what you think about the wild and scenic river alternatives. Each comment we receive tonight and any other comments we receive in the mail until July 9th will be carefully read and responded to as appropriate. The public comments may teault in changes to the document. The comments and responses will be published in the final document. This will be sent to the Secretary of the Interior and forwarded to Congress to aid in making decisions about adding rivers to the national wild and scenic rivers mystem.

I'll give it back to Laxry now. As he mentioned, this is a formal public hearing process and ian't a question and answer force so I won't ask if there are any questions at this time. But I and other members of the BLM will be around after the emeting if there is something you would like to discuss. Thank you, larry.

MR. BAUER: I have a request for the fellows

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in the control room back there. Would you turn up the lights on the sudience, please? Thank you very much. At the present time I have 13 people who indicate they wish to speak so I'm quing to stact out by allocating a maximum of 10 minutes per person. When I call your name and you get up to the microphone down here, please state your name, where you're from, and who you represent, or if you're speaking for yourself. Those who have under with written statements may leave them with us when they finish speaking. The first speaker is C. D. Coohran.

MR. COUNTAN: Good evening. Ny name is
Charles Cochran. I'm from Safford, lived here over 35
years now. And those are my comments. So me we gather
here this evening we are maked to comment on parts of
the Arizona plan relating to the Wild and Scenic Rivers
Act. First, I would say publicly this act of Congress
will ultimately he found to be unconstitutional, as will
many of the Congressional acts that have been with the
sovereignty of states' rights under troaty agreements
and under the aqual footing clause of our Constitution.
Ladine and gantlemen, the state of Arizone still owns
all lands within her boundaries as does each state in
the Union. Pedeval land regulations apply only in the
territoxies, such as Guas and Fuerto Rico. Fadore) land
regulations do not apply in the accercing states.

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Having said these things, I call upon the federal agencies involved to provide my county supervisor with appropriate documentation showing the land titles being held by them within Graham County. Further, I call for an open-saided delay in planning activities until these land deeds are provided to our county supervisor. Thank you.

NR, BAUER: Cor next apeaker le Terry Bingham.

MR. HINGHAMI My name is Terry Bingham. I'm from Safford. 1'm with the Graham County Board of Supervisors. Now, we've been in this valley now for five generations, and we've got along just fine. We've raised our families, been able to grow our crops, raised our gardens. This is a wonderful place in which to live. You know, in the last couple of years it amazes me how we got along with these 115 years without appealody telling us what to do and making our decisions for us. Seems as though all at once we are being told that we are descroying and not protecting our lands, and because of this we need somebody to do it for us. Let me give you a few examples. A while back you created the Gila Bux riparian area. Took away some of our rights. You know, this river had one of the finest riparian areas that I have seen just 18 months ago. Go

lock at it now. It's not there. Hen didn't do it, but Noare, nature did. No lunger is there a riparian area. Now MR. MOORE: My name is Kaynes Moore. I have they come along and told us that we're destroying the lived in Graham County for about 36 years. I reside in fish, and so we have to be regulated again. We can't go Safford, and I'm also a pember of the Graham County in and build our dikes and dama any longer because it Board of Supervisors. My plea is that we all look at will burt the fish. And to end behold we come to find this in an objective manner, and I'm efraid that there's out that one fish was eating the other one. Not mennot been shough study done on the possible adversa We didn't destroy it. Now we have ADEQ here telling us economic conditions that could occur if this is that we're polluting the river and it's no longer good. designated as a wild and scenic river. And as you know, Now, we have one more. The wild and scenic rivers. You Graham County is the puozest county in the state of 10 know, this must be the most famous etretch of river in Arizona and we can't afford to have enything that would 11 11 12 interfere with our agriculture interest because that is 12 13 35 percent of our total economic base in Graham County. 13 And also I'm afraid that this would adversaly affect the 14 T5-2 these other designations we are discriminating against 15 tourism that might possibly be developed along the the handicapped. No longer do they have access to go up river. So my plea is that the no action elternative be into our places and participate. Yes, I understand considered. Thank you. 19 T5-7 14 you'll make a place where you can drive up to, but no 16 MR. BAUER: Our next speaker is John Luepke. longer can I go up in there like I used to and enjoy it MR. LUEPKE: My name is John Luepke. My 19 because I'm bandicapped. In it fair? In it right for family and I have lived out in Aravaipa Canyon for the 20 those people to be discriminated against? What I am last 15 years. And we are the -- my comments are really 2.3 proposing is thet you do not designate it, and that's pointed to Aravaipa, the mituation out there. We are 22 what we're asking tonight. I think what we are here to the last residence before you come down to the 23 may tonight is, gentlemen, we have had enough. wilderness area and the proposed wild and scenic 24 corridor there. And what we are concerned with is that BARTELT & REMYON BARTELT & KENYON 15 we have -- although wa're not in the area designated or into this wild and scenic area. We have been using the that is proposed to be designated right now, we are river and enjoying it, and we do realize if they make concerned about the possibility of the effects of our this a scenic river, we will not be able to do se we diversion dam and whether that would be considered a have done, going up to picate where we want to, when we detriment to the scenic values because of the occasional want to, and enjoy the eres. But one of the things that turbidity that's caused by putting up the diversion. we are really concerned about is when they come along And so we would like it -- I would like very much to and they tell us in these areas, oh, dear, you can't have some policy stated as to how effects like this in come here anymore because we have an endangered species. T5-3 areas adjacent to the proposed corridors -- how they Well. I want all of you to know that this isn't going to will be affected; how, for instance, the turbidity of just atop up here. Now they're on Graham Mountain. Ne 10 10 had the upper Twilight Canyon reserved for a class 11 the water that occasionally happens. 11 12 reunion, which we've tried to hold on the mountain aver 12 13 and scenic rivers -- the statements that I have read since 1951, and we have had to reserve since the first 13 14 have indicated that cultural and historical values are of the year. We received a call from a ranger the other 14 15 important also, important considerations to this, and day who said, oh, you're not going to be able to use 15 16 agriculture out there is a historical fact of life and that area. There is an endangered species up there. It 16 17 our farm out there is a relic of that. It's the last 17 one in that particular area. So, thank you. And now most of you know that they have been 18 apending a lot of money to get the area all fixed up for 19 MR. BAUERt I apologize for my pronunciation 19 of the next epoaker's last name. Botty Jean Clunts. the public to use for camping and everything. We can't T5-4 go down there. You can't do it. And so it's not going MS. CLUNTS: My name is Botty Jean Clunts, 22 and I am kind of representing the Sanches areas, those to stop there. And I sm -- for our eres up there we are 22 highly apposed to having a wild and scenic river, and as 23 people that live on that side of the river over there. 23 We are really concerned about this because this is our Terri said, I would be one who could not walk up in 24 neighborhood in which they're talking about making this there any more to do it either. So we just want to let

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you know that we are highly opposed to it. such as the riperian protection areas, and exemine what MR. BAUSA: Our next speaker is Howard 3 all of these total impacts have caused. The ò Dutchingon. requirements under the National Environmental Policy Act MR. MOTCHINSON: My name is Roward through the Council of Environmental Quality require Butchinson, and I am working for the Combition of that the cumulative impacts be examined. Arizona/New Mexico Counties. We submitted a rather We also are concerned with the commingling deteiled list of scoping issues to the BLM and noted of the conservation areas and the wilderness areas T5-6 that In the text here the majority of those concerns and coupled with the wild and scenic designation. There is issues have been relegated to lesues considered, but not specific language in the wilderness and national enalyzed. And we believe that the issues that were 10 10 conservation area actions that prohibited buffer rones submitted to the SLM from the various affected counties 11 11 that are now being destroyed by wild and scenic river ere certainly eignificant and certainly worthy of 12 classification. We would also like to request that the 12 consideration. BLM quit making the statement that private lands are not 13 13 The Wild and Scenic Rivers Act does have affected and uses of lands are not affected by wild and 14 14 eignificant impacts on private property. And I would scenic river designations. It's very clear in the act 15 15 suggest that within the environmental impact statement 16 that actions on private land are discouraged. 16 being submitted to Congress that there he a detailed 17 This initial draft, when it examined the listing of the impacts on private property holdings on economic impacts, has failed to examine any of the other other selected wild and scenic rivers in the United impacts that are taking place from various other federal 19 States. But I would also like to request that the BLM actions either under consideration or having taken reconsider their delegation of these two issues not place, such as range land reform. There's also a T5-5 22 enalyzed and examine the cumulative economic and social failure to consider impacts on the upstress water uses impacts, not only from the designation of the wild and in New Mexico. One of the things that was interesting mounic river, but also from the designations of in here was that it would consider purchases on a endangered and threatened species, other lands set aside willing myllor/willing buyer basis of senior downstream BARTELT & RENTON MARTELT & KENTON water rights. I have quite a bit of understanding about which in some cases is limiting or aliminating industry. water flows and it would seem that downstress water T5-7 1 2 I would ask that the Bureau reexamine their designations rights would be the last thing that would be acquired. and especially in areas like the lower Sen Francisco Upstream water rights are what designates what the . giver near Noregoi and others where future development instrume flow is through a particular area. is anticipated. And though presently it seems like T5-8 There are quite enough other things in here, there is no adverse effect. there is enough vagueness in whether they are deficiencies, examinations in the water the requistions that are in the law that would allow for someone with a high-priced attorney to come in, and put some undesirable restrictions on development necessary impacts, and we would like to suggest that all of these for people's livelihood. I think everybody here 10 10 oumplative impacts be examined. Thank you. 11 regardless of whether they're pro or con in regard to 13 MR. BAUER: Our next speaker is John 12 the wild and scenic rivers -- we all enjoy our rivers 12 13 We would al) like to see them maintained in some sort of 13 14 MR. KOROLSKY: My name is John Korolsky. fashion that we can enjoy them. However, I'm nut sure 14 I'm from Morenci. These are my personal comments. this is the proper way to go about it. That's all f 15 15 Reading through the dreft BIS, my concern is that the 16 have got. MR. BAUER: Our next speaker is Delbart Hureau of Land Management has not thought in depth about 17 17 potential consequences. Phrases like does not 18 Russehalder. anticipate and those do not quarantee that sdveree 19 MR. HOUSEHOLDER: My pame is Delbert 19 actions or results could occur. I believe there is a Musseholder. I'm a member of the Graham County Board. 70 real possibility, maybe even a probability, that 21 21 The Board has five different issues that we are quite although the intentions are good, that restrictions on 22 future development that are not enticipated right now 23 Gila River, which is the Gile Mos; Manite Creek; 23 could come about through litigation brought by apacial Aravaipa Crook and Turkey Creek. We ampport the n 24 T5-9 interest groups seeking to further their own agenda action a)ternative on all of those rivers and creeks. BARTELT & MENYOR BARTELT & REMYON

You know, water's a lifeblood to this area here and without it it's got a negative impact on our economic and social. It is critical not only for domestic purposes, but the major sectors of our countywide economy base which includes mining, agricultural, ranching and recreation. The San Francisco and the Gila Rivers, including tributaries, are inadequate to most the existing allocations of entitlement. These waters are managed by the federal courts under the 1935 Globs Equity Decree. Any Attempt by federal agencies to require additional water rights would result in further

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Land acquisition will further impact local property taxation which must support state and local government and services and education. While the federal government pays payment in lieu of taxation, the formula was put in 20 years ago and it never has changed. And we just feel like it's tipe that we go lucking after the people here within our county and the United States. They are the endangered species now. They have to raise their families and support their needs. And I think pauple need to go looking after the people and not all these endangered species. The Busid her got a written eletement here that I'm going to leave with you, and we hope you consider it real strongly when

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a decision is sadu. Thank you.

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MR. BAUER: Our next speaker is ven Telley. MR. TALLEY: My name is Van Talley. First of all, I'd like to thank you folks for the opportunity to allow us ditisens to express our concerns about the wild and scenic rivers and the impact that it would have on our valley. I happen to be the Mayor of the City of Safford. I am speaking for myself this evening and the Safford City Council along with myself will be presenting a written atstement before your July 8th deadline outlining our position more clearly than what I will this evening.

The City of Sefford has several interests in the area. One of them happens to be the water, domestic water resource for the majority of the county. We want to see that water source preserved. We want to be able to use the water source and at some point in time we may want to expand the water source to peet the growing needs of the valley. We are somewhat hesitant to put the stamp of approval on any document that somehow may 21 affect that source in the future.

The other thing that we're concerned about is the farming and agricultura), economic impact that any kind of a designation would have on the rivers. The City of Safford started out a farming community and it

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still is a farming community and we are proud of the fact that we are besed in farming. And I think that the etrength of our community comes from that heritage and we want to preserve that. Traditional uses with the rivers, I think, need to be exemined very closely. I would tell you as a young adult I spent many a Sunday, not in church. I'm serry. Heny a Sunday going up the river in a send rail with family and friends. It was certainly a good recreational outlot for our family; samething that we thoroughly enjoyed. I don't believe that what we did had any adverse impact on the ereas that we went in the sand rail. As one of the Board of Supervisors said earlier, this last flood pretty much wiped out any indication of one by humans in that area. And I think any future flood, which we seem to have them every two or three years, will probably do the mame.

As I had the opportunity on several occasions over the last few months to go examine some work that we were doing at the Bonita Creek area on our water system. I noticed several groups on different occasions of young people that were down in the Gila River. They had taken their four-wheel drives down there and set up a small camp and they had a volleyball net, and, you know, I'm sure they had some refreshments and were enjoying thomselves. And I guess as I went

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through there in my mind I thought, gear, there is no better place for these people to be enjoying themselves I don't want to see any of that Ilmited. I think that we want to work with BLM. We want to preserve these areas and we would like BLM to help us in that preservation through education, through enforcement of laws that would keep vandals from destroying the areas. But I don't think the answer is to keep the public out and to keep the access limited by not allowing vehicles up in those areas. But anyway, that's my comment this evening. Thank you.

MR. MAURR: Our next speaker is Donald Stecey.

NR. STACEY: My name is Don Stacey, and I'm a mamber of the heard of Supervisors, Greenles County, and this is the official position of Greenles County concerning the wild and scenic rivers designation.

During scoping meetings and comment pariods previously held regarding wild and scanic rivers designation in our area, Greenles County has made its concerns known regerding the unknown impact of wild and scenic river designation on the various components of our economy. Mining, agriculture, grazing and flood control are all important components or issues affecting our local aconomy and lifestyle. We feel wild and

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access as allowable. We fear wild and scenic river scenic river designation may have a negative overall T5-12 impact on the aconomic of Green)es County. A short designation will restrict our concept of such public ravies of the draft legislative environmental impact access. With this in mind, Greenles County wishes to go statement causes us to present the following comments. on record as supporting the no action alternative on T5-14 |, aithough the three volumes are full of interesting these three study areas and request the BLK continue to information, our comments will deal mainly with the manage public lands under its control without such perceived impact of designation of the Gila Box, Gila designation. I want to thank you on bahalf of Greenles County for this opportunity. River: Gila Box. San Francisco River study areas; and to 9 a lesser extent, the middle file River study aron. MR. MAUER: Our next speaker is George Comments pertaining to all three study areas 10 MX. LEMEN: My name is George Lemen. I'm 11 Include our continued concern that flood control 11 from Fime, and I'm hare to epeak in favor of the no 12 activities will have unnecessary restrictions placed 12 action plan. I represent among other people the upon them in our county. Periodic flooding causes major 13 13 handicapped people in this community. Readly a week property and crop demagn in the Greenlee/Graham County 14 14 goes by that I don't drive on one of your very nicely 15 areas. Any further restrictions in dealing with this 15 issue is not acceptable to our county. Water rights provided for me quavel roads in this county. If you 16 16 issues for agriculture and mining as well as grazing 17 17 could be impacted by the designations of these three 10 on up and look at the rivers and the streams anymore. 18 study areas. We atrongly feel that the wild and aconic There are some nice roads up on the San Francisco and up 19 19 designation of the two study areas connected to the Gila in the Gila Box. And I would not like -- on top of 20 20 [t5-13]²¹ Box Mational Conservation area are unwerrented since that, there's a really nice road that runs up Bonits 71 T5-15 22 Creak. And if you take that away from me, how am I protection for that area has been provided by Congress. Greenice County has a strong record of supporting supposed to go up there? Some other people have said, 23 woll, there's wheelchairs that are made like mountain multiple-use activity with an additional emphasis that 24 24 bikes and you can go almost enywhere in there on one of our public lands and waters should have as much public 75 BARTBLT & KENYON BARTELT & KENYON those, and that may be true if you have two hands. T only have one. I can go round and round and round and MR. STAUFFER: I really didn't plan on round, but I don't get up very well on a wheelchair. I speaking tonight until I got here and I looked outside, can't walk uphill anymore and I cen't walk downhill but everything that's happened here tonight and what I anymore without assistance. I go up there in my have beend reminds me of what happened in Santer of four-wheel drive. I haven't had my truck in four-wheel 1964. Three young lade wont up to Meet Creek, camped drive in three years. But I could go up those roads and out. All three worked at Thrifty Supermarket. We were down thuse roads and look at the creeks and have a good students in school and everything else. And we picale with my wife and our children. Don't do this to decided we were just going to take a little break. So 9 us. Please do not do this to us. Please allow on the Saturday avening, when we got through work at Thrifty 10 opportunity to go up and observe and look at and enjoy Supermerket, we drove up in a 1952 Jeep four-wheel drive 11 11 pickup. Went to Newt Creak, camped out, three of us. 12 the rivers that we now our enjoy-12 until 1985, I was an avid hiker and a member But of those three, I'm the only one here today. 13 1.0 of the National Ski Patrol system. Wiker, backpacker, Saturday a apocial caremony is being held for walter B., 14 14 and then in 1985 one might I wake up unable to move my Bruce, Poote at the Special Forces here at the cemetery. 15 15 Got killed in Ylstoam. Awarded the Silver Star. right side. Unable to speak. Thanks to some nice 16 16 Clayton Gatlin apent two tours in Vietnam. He came neonle in the hospitals around here and in some other 17 17 home, but all of you that knew Clayton, he didn't places. I got my speach back and I got some of the use 16 10 auryive Vietnem. Two Purple Hearts and a Gronze Star of my right side back. Please, do not do this to us. 19 19 If you're -- I'm morry, but I know -- I don't know what 20 20 right here. I want my son to be able to get in my Bronco whee to may except please consider the no change and 21 21 nonsider it wisely because you, you, you and averyons four-whool drive and drive up to Neet Creek and be able 22 22 T5-16 🔐 to camp with his friends. And if you push this through, here could wake up in the morning after having a stroke 23 and be unable to use half their body. Thank you. it's not going to happen. There is no way that three of 24 MR. HAUPRI Our next speaker is Bailey us would walk up to Neet Creek and camp the weekend-25 25

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And the reason I'm speaking tonight is we drove in here and I waw a white Blazer or Bronco, f don't know which one it was. But I saw a big sign on the front of it that said Manger. Folks, I was an Airborne Ranger in Vietnam. I was one of the first there was. I walked in here and I saw one of your bove with either a nine millimeter or a .45 cm his blp. and T don't know what you're aireid of, but that upent the hell out of me. I don't know why you need an armed quard coming in to one of these mestings that is a po-called Rapper. Yesterday Provident Clinton awarded the Congressional Medal of Honor to two Airborns Rangers from Somella. But you min't got no business calling yourself Rangers and you got no business coming to our meetings wearing guns. Thank you.

MR. BAVER: Our next speaker is Bob Cuyle. MR. COYDE: I went to thank you for the opportunity to speak on the designation of wild and scenic rivers in Arizona. My name is Bob Coyla. I'm from Morenoi, and I'm making this statement on behalf of Phelps Dodge Himing. This state of Arizona leads the nation in mineral production providing a sound tax base and employment opportunities for many communities throughout the state so well as copper and other minerals withit to the nation's well-being. Determining

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the spirability of wild and scenio rivers is an important process. Phelps findge is concerned that the potential impact of such a designation on private property rights, water rights, tax here and economic development lesses received full consideration.

An understanding of what a wild and scenic designation means must be made clear. The ephere of influence of even the least restrictive designation is not limited to just the river or its corridor. Indeed, the Wild and Scanic Rivers Act can be used to prohibit the issuance of required federal permits for any activity within or occurring outside of the river corridor that could affect the existing natural conditions including air quality, water quality, sound levels, visual attributes or natural flows within the corridor. In addition, the Act proposes protecting the natural condition of the river by coordination with state and local agencies that issue such permits or develop roming regulation.

Current multiple use management practices and special status provided to many of these areas under existing SLM requistions has given us rivers of outstanding natural value. We must determine if designation as wild and scenic will enhance the value of these rivers enough to offset the Impacts of such

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designations.

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Specifically, Phelps Ondgo is opposed to the designation of the lower Sen Francisco River and the Sen Pedro River because of their proximity to our walsting operations at Horanci and Bishee. Phelos Dodge also opposes the designation of Bonits Creek because of its proximity to potential future operations in this area.

In summary, Phelps Dodge would like to make the following impacts of designation clear. Any wild, scenic or recreation riwer designation will restrict present activities end provent future multiple use of the river corridors and edjacent torrain.

We support the protection of truly superior stream segments, but we feel that this exercise should not result in the prohibition or restriction of estating activities or important future development. The analysis of opportunities foregone because of designation of these river sequents in comparison to the unique values that are protected should be carefully considered. Additionally, the impact on the quetoms and culture of the local community must be considered. I appreniate the opportunity to make these comments. I have a written statement also.

MR. BAUER: Qut next speaker is Jeff

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MR. GRIPPIN: My name la Jaff Griffin. I

thank you for the opportunity to speak on behalf of the Arizona Mining Association and its member companies on the designation of wild and scenic givers in Arizona. The designation of six rivers in the Safford district are of particular concern to the Mining Association members and our concern is for the restriction of future development along these river corridors, both within the contidors and adjacent to the corridors. I have an example of the type of restriction that would occur. Recently proposed legislation by the Souss of Representatives status that the Socretary of either Agriculture or the Interior shall have up to one year to review the lands included in a mining permit se well se lands onto which mineral activity may expand to determine whether mining activities would significantly degrade the values for which our natural conservation avetems unit located in close proximity to the mining activities was established. These natural conservation system include wild and scenic rivers. The Arizona Mining Association is opposed to any designation that will restrict the future development of areas adjacent to river corridors.

MR. BAUER: What I'd like to do now is recess this meeting for about an hour and give you an

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opportunity to look at the maps in the back, mak questions of Phil, and we also have Frank Riley. Are you still here, Frank? Frank left; okay. Med Johnson. Mag's our resource area manager for this area; and Diene brobks, manager of the affairs office for this district. You'll have a chance to talk to them. Affar about a half bour, I will call the meeting back into semmina and if anybody slas would like to make any acre comments or any additional comments, we will make time available to do that. So at this time I call the meeting into

(A recess was taken)

MR. BAUER: At this time I would like to only the hearing bauk in order. Do I have anyone else who'd like to speak? I had earlier that it was someone.

Yes, in the back. Please remember to etate your neme.

MR. ELLY: My name is Tony Elly. I'm originally from prescott, Arixona. I have also lived in Plagetaff. I have lived in Phoenix; I have lived in Tursum, and I have also lived here for a very short than. But I'm quite attached to this area. I do work

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for Phelps Dodge Mining Company. I have noticed a

certain attitude here today, and that attitude is it seems like we're pleading with our government not to do something. We're pleading with our government, which we are supposed to be in control of. We're supposed to ken the government, we the people. And that's not happening right now. We're sitting here, it looks like children pleading and begging even with tears sometimes about sentimental things and values in our life, and we are pleading with our government not to do things that we hold true, we hold as part of our lives, and I see that

Even if this environmental impact statement doesn't right now affect our livelihood, our recreational activities, even if it doesn't happen right now, we must nip this in the bud. Fine. We have a few special interest groups that say, oh, we want to protect this river for this specific use. Well, that's fine. We used to protect our land from minuse. But also this land has been given to us for our use, and I think we must nip this seed in the bud. And if you get wands in your crups, what would you do? You take cars of them in the bud. You don't let them grow. You must take case of it as soon as possible. And if there's any wining or any farming or any ladustry that's going to occur in this area and it's affected directly by this impact

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Statement or another one that has in dual with this statement later in the future, maybe not in our lifetime, but this will affect other legislation in the future and we must tightly — as people of this country, we must nip this or at least tightly watch what our government is doing so that it does not affect our future. Great, we may have some great rivers a hundred years from now. But they're going to be through ghost towns. They're going to go through towns with no people. There will be a building and a great river running through it. What good does that do for anybody?

I wasn't planning to speak tonight. I just heard about this westing about 3100 o'clock this efternoon, that it was going to heppen. So I threw some comments together as I got here. And when making a decision — which I besically believe that's what's happening — there's an impact statement, there's something going before our Congress, and they're going to be making a decision on this. I think say time you hake a decision, whether you're a young child or whether you're a married person, whather you're older in years, you must weigh the pros and cons. You must areas pros on one side and cons on the other. And fine, we need rivers. We need recreational areas. We need things

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25 that protect it. But when the resorback sucker is put

before the human being, there is something wrong.

There's something definitely wrong. What's more
important, the resorback sucker or a human being? If
you're standing here and you're faced with a decision,
your wife is next to you, your humband ur your oblid,
and you're going to choose between that resorback sucker
or your family member or your beat friend, what are you
going to choose? What are you going to choose the
livelihood for? Who are you going to choose, your
family, your inlands, your country, the livelihood of
your country?

And also taxes. How are we going to regulate this? How are we going to make sure if these scenic rivers need to be protected, how are we going to do it? We can't protect our people from getting murdared. Why are we worried about protecting a few suckers and a few weeds under the riverbed ux why are we worried about this when we have so many other things to worry about.

Our country is trying to take away jobs by
making -- whether it's this specific legislation we have
before us now, but any general legislation that limits
our use of our land. Len's think about this. Limiting
our land would take away jobs. And what does Clinton
eay all the time? He says we want jobs; we want to

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provide jobs. But what happens? Our government takes away jobs when they limit the use of our land. When yo limit the use of our lend -- they say we want to make something a wild and scenic river or wild and scenic rivers or specifically whatever also is going to be designated, and they're going to protect it with some legislation, as they being the government, that we are not now in charge of. When that happens, let's say we make this portion of the river, eay the Verde River in Cottonwood, Arisona, that summ down into mouthern Arizons. When you protect a small portion of that river, the government is not only going to fust protect the small portion, but all the runoff areas, storm water runoff. That water runs for miles and miles of aguere miles around. A lot of people own these lands, whether public lands or private lands. They are going to say, well, you can't do this on your land, and this is your lend so that's taking away your rights of using that land. And this is our country, and we can use our land the way we want to. That doesn't mean we want to shume our privileges of our land. We must slways be conservative with our lands. We must be thoughtful of

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And working with Phelps Undge t would like to state one thing. Yes, mining may not always be a

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beautiful eight when you come across it, but I would say that working with them there, they are very conscientious about protecting the land and when they leave it, they make an effort to clean it up. They make an effort to not contaminate water. They make an effort not to conteminate the land. And I can remember something in my past of someone trying to protect the Copper Basin area near Prescott, and there was a mine they wented to go in there and an environmental impact statement was in progress, and how much was it going to cost to make that etatement. And the person that was in charge of -- against this project that didn't want the mins to go in, environmentalist, they said, oh, you can't cut down our trace, you can't mine there because you're going to ruin the beauty of our land by doing that. I egree it's a beautiful land we live in. But also that person lived in a log cabin. I think there's definitely a problem here. Okey.

Now, we must keep ourselves in check. He must not be hypocritical about our thoughts. Let's be straightforward about our land. We need to protect our land for our children, but we must also protect our accommon future. If our taxes are going to pay for this, why do we want to spend sonny for legislation that might not even be preventing anything? If we want to

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protect a river that's not going to be conteminated, why pay money to protect a river that's not going to be contaminated in the first place?

Pleasure and recreation. I think we can all sacrifice pleasure and recreation to a certain degree, but it all has the same importance. We must all have recreation in our lives. Otherwise it would be dull. If we were to protect a river, whether you're hendicapped or whether you're not, you went to hike into the area, which I have done all my life. I have been a hiker, and if I couldn't get in an area and it was restricted for whatever reason, for -- say I can't hike into that area because of a waterfail or snowball effect or this legislation. First of all, you can't fish here; first of all, you can't make reads to get to these places. Then I can't backpack in these. And then what in the after that? What other recreation are they, our government, going to steal from us?

And once again I'd like to make the point that we're in charge of our government. He must take that role back for the American people. And there is -- I was vary disappointed here. I didn't see very many people here. Maybe they didn't hear that it was going to happen. But I think we need to help inform our neighbor of what our government is doing because -- when

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I was a senior in high school, I didn't know very much about government at all. I took a civice chase and my eyes were opened to our government. I think most of the time people of our country need to be informed so that they again will feel not only the feelings and emotion, but the logical responses that we need to be waking.

Mining, ferming, industry are already sufficiating with the different regulations that are put on them. Why take away more jobe? We as a nation were fleeing oppression, whether it was religious oppression, economic oppression from other countries; whether we're from Africa, whether we're from Asia, whether we're from Britain, whether we're from anywhere in Europe, Canada or even Mexico. We flee oppression to come to America. Why put ourselves back under it? We need to be empowered to take back our land from our government.

The last thing I'd like to say is this impact statement is already coming from a bias. They look at it and say, okey, we see rivers that need to be protected, but they're not seeing man. When you want to look at something, you look at the pros and come.

Always. Man and the rivers, fine. Me'll look at it in the light of both of thes. We want to protect this land. We want to protect man also and his livelihood and his future. I think when making laws of this

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nature, which I think are possible in the right bins, or might I may, in the right point of view, we must always look at the impact it a going to have on people, not just animals, vegetation, and rivers. I thank you for your time.

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T5-23

MR. MAURR). Is there anyone else who would like to speak tonight? Would you like to make an additional statement, MR. am? Come on down. Mould you restate your name?

MS. CLUNTS: Ny name is Betty Jean Clunts. Because I get excited when I get up here I could not finish what I wanted to a while ago. So I want to just eay, you know, this river, this scenic area, the birds, fish, excepthing that's there has been there for hundreds of years. Robody's taking thes eway unless you guye decide that you're going to pase this. It is here for all of us to see and es can all see it. It's time that we do think about everyone, which is humans, instead of the fish, the sinemals, the birds. These things are here anyway. When you came and find them and you say they're an endangered species — they have been there. You just happen to come upon them. And this is our beautiful country here, and we would like to keep it in our valley so that all of us could come and see it.

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MR. BAUER: Is there anyone else? Yes, sir. Yt's Mutchinson; right?

NR. EUTCEINSON: Yes, Boward Eutchinson, again with the Coalition of Arizons/New Mexico Counties. In the exemination of the social and economic impacts from this, we would like to specifically have these addressed county by county. Whenever you make your economic impact ensiyes based on a statewide economy, it often forgets that these local economies are very fragile and when compared to a statewide economic condition, there would be a result of the finding of no significant impact. However, the mignificant impact does occur at the local area. And no rather than having this exemination of this statewide, have it county by county.

MR. BAUER: Is there anyone eise? If not, I want to remind all of you and strongly urge those of you who have not spoken to send your comments to us before July the 8th. The meiling address is printed on the gover latter attached to the drafted legislative environmental impact statement. Send your comments to Phil Moreland, Bureau of Land Management, Post Office Box 16563, Phoenix, Arizona. 85011. Thank you all for coming. This public meeting is hereby adjourned.

(The hearing concluded at 8:45 p.m.)

BARTELT & KENYON

BE IT KNOWN that the foregoing proceedings were taken before ps. MELISSA J. BART, a Notary Public in and for the County of Maricopa, State of Arizona; taken down by me in shorthand and thereafter reduced to computer-mided transcription under my direction; that the foregoing 42 pages are a true and correct transcript of all proceedings had upon the taking of said proceedings, all done to the best of my skill and ability.

I FURTHER CERTIFY that I am in no way related to any of the parties hereto nor am I in any way intermeted in the outcome hereof.

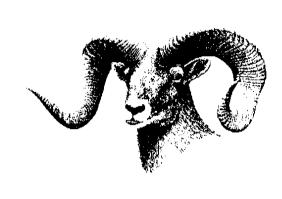
DATED at Tucson, Arisons, this 2nd day of June, 1994.

melission expires:

Notary Fublic

21 October 31, 1995

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JOE CARTER, COUNTY HANAGEN BARBARA PELIX, CLERK

May 23, 1994

Mr. Phil Moreland, Chief Branch of Planning Arigona State Offica PO Box 16563 Phyenia, Ag 85014

RE: Wild and Scenic River Suitability Assessment

Dear Mr. Moreland:

Thank you for the opportunity to review and comment on the Bureau's Mild and Scenic Rivers tuyislative Environmental Impact Statement. Elected officially and private soctor community leaders throughout Graham and Generies Counties have closely monitored this issue. We along with other local government officials and our chambers of Counties and Counties and Counties of Counties and Counties of Counties and Counties of Counties and Counties and

LOMER SAM FRANCISCO REVER - The Bureau proposes two segments totaling 6.4 mfley of the River for inclusion in the National Mild and Scenic Rivers System requiring additional federal expenses of 5697,000 dollars for acquisition of water rights, staff positions and management during the first five years. We support the no action elements.

GELA RIVER (GILA BOX) - The Bureau proposes 26.6 miles of the Gila River for inclusion in the Mational Mila and Scenic Rivers System requiring Additional rederal expenses of \$179.500 dollars for land exchange, acquisition of Mater rights, staff positions and management over the first five years. We support the no action alternative.

BONITA CREEK - The Bureau proposes 8.1 miles of Bonita Creek for inclusion in the Mailmell Wild and Scenic Rivers System requiring federal expenses for land/water rights acquisition and management. We support the no action alternative.

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

ARAMAIPA CREEK - The Bureau propuses all ten mins of Anawaipa Crock for inclusion in the National Wild and Science Rivers System requiring additional faderal expenses. We support the na action alternative.

THRKET CREEK - The Hurton proposes 3.2 miles of Turkry Creek for inclusion in the National Mild and Scenic Rivers System requiring additional Faderal expension for land acquisition and management. We support the mostion alternative.

The basis for our support of the no action alternative for each of the above river segments is the megative aconomic and societ impact. More specifically our concerns facilude:

Mater 1, the life blood of our economic mainstay. It is crucial not unly for domestic purposes but for the major sectors of our countyride economic base which includes mining, spriculture, renching and recreation. Surface water is crucial to the appriculture, signing and vanishing industries. The San Francisco and filleriver maters including their tributaries are finad-quate to meet the calling allowation of entitlements. These maters are managed by the Federal Court under the 1930 Globe Equity Decree. Any estempts by Federal agencies to sequire additional water rights will result in further negative impact.

land according which will further impect loual property taxation which must support state and local government services and education. Graham County consists of a land mass is private with the remaining ninety three percent heny idears lands and a portion of the San Carlos Apache Tribe Reservation. While the Federal Government pays payment in-lieu or taxation, the formula used for these payments have been adjusted since it taxation, the formula used for these payments have been adjusted since it taxation, the formula used for these payments have been adjusted since it was created almost threaty years ago. Any attempt to remove more private lands through according will affect our ability to generate meaded property taxes to meet the above state obligations.

Recreation and tourism are an even increasing component of rural economics. The Grahom/Greenles area is no exception. Area local governments and Chemiers of Commerce have invested substantial oddlers in promosification afforts in an attention to shore up the release sector component of our aconomic base. Acquisition of land, were rights, restricting access and use will have a negative impact on efforts be two promotine over the last ten years.

In reviewing the no action alternative for each of the above it is clear that each sugment can be properly menegod under present BLM menegoment schemes and in a manner that provides in most cases the same protection as contained in each recommended atternative without the additional faderal expense and megative impact on our economy and traditional land uses.

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DEBOTANT N. COLLY

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TESTMONY OF DONALD R. STACEY DISTRICT 1 SUPERVISOR ON BEHALF OF THE GREENLEE COUNTY BOARD OF SUPERVISORS AT THE SUM WILD AND SCENIC RIVERS HEARING TUESDAY, MAY 24, 1994 SAFFORD, ARIZONA

DURING SCOPING MEETINGS AND COMMENT PERIODS PREVIOUSLY HELD REGARDING WILD AND SCENIC RIVER DESIGNATION IN OUR AREA, GREENLEE COUNTY HAS MADE ITS CONCERN KNOWN REGARDING THE UNKNOWN IMPACT OF WILD AND SCENIC RIVER DESIGNATION ON THE VARIOUS COMPONENTS OF OUR ECONOMY. MINING, AGRICULTURE, GRAZING, AND FLOOD CONTROL ARE ALL WIPORTANT COMPONENTS OR ISSUES AFFECTING OUR LOCAL ECONOMY AND LIFESTYLE. WIE FEEL WILD AND SCENIC RIVER DESIGNATION MAY HAVE A NEGATIVE OVERALL IMPACT UPON THE ECONOMY OF GREENLEE COUNTY.

A SHORT REVIEW OF THE DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT CAUSES US TO PRESENT THE FOLLOWING COMMENTS. ALTHOUGH THE THREE VOLLUMES ARE FULL OF INTERESTING INFORMATION, DUR COMMENTS WILL DEAL MAINLY WITH THE PERCENED IMPACTS OF DESIGNATION OF THE GILA BOX. SILA RIVER, SILD SAN ERRAISICO RIVER, AND TO A LESSOR EXTENT, MIDDLE GILA RIVER STUDY AREAS.

COMMENTS PERTAINING TO ALL THREE STUDY AREAS INCLUDE OUR CONTINUED CONCERN THAT FLOOD CONTROL ACTIVITIES WILL HAVE UNNECESSARY RESTRICTIONS PLACE UPON THEM IN OUR COUNTY. PERIODIC FLOODING CAUSES MAJOR PROPERTY AND CROE DAMAGE IN THE GREENLEFLORAHAM COUNTY AREAS ANY FURTHER RESTRICTIONS IN DEALING WITH THIS ISSUE IS NOT ACCEPTABLE TO OUR COUNTY. WATER RIGHT ISSUES FOR AGRICULTURE AND MINING AS WELL AS GRAZING COULD BE IMPACTED BY DESIGNATION OF THESE THREE STUDY AREAS.

FOR GREENLEE COUNTY

WE STRONGLY FEEL THAT THE WILD AND SCENIC DESIGNATION OF THE TWO STUDY AREAS CONNECTED TO THE GILA BOX NATIONAL CONSERVATION AREA ARE UNWARRANTED SINCE PROTECTION TO THAT AREA HAS BEEN PROVIDED BY CONGRESS. WE ARE STILL TRYING TO EVALUATE THE IMPACTS OF THE GILA BOX NCA DESIGNATION ON OUR COUNTY AND HOPE THIS ADDITIONAL WILD AND SCENIC RIVER DESIGNATION FEFORT IS NOT SIMPLY A WAY TO MAKE SOMEONE LOOK GOOD WHEN THE TOTAL NUMBER OF DESIGNATED MILES ARE ADDED UP

GREFNLEE COUNTY HAS A STRONG RECORD OF SUPPORTING MULTIPLE USE ACTIVITY WITH AN ADDITIONAL EMPHASIS THAT OUR PUBLIC LANDS AND WATERS SHOULD HAVE AS MUCII PUBLIC ACCESS AS ALLOWABLE. WE FEAR WILL DAND SCENIC RIVER DESIGNATION MULL RESTRICT OUR CONCEPT OF SUCH PUBLIC ACCESS. WITH THIS IN MIND, GREENLEE COUNTY WISHES TO GO ON RECORD AS SUPPORTING THE NO ACTION ALTERNATIVE ON THESE THREE STUDY AREAS AND REQUEST THAT BUM CONTINUE TO MANAGE PUBLIC LANDS UNDER IT'S CONTROL WITHOUT SUCH DESIGNATIONS. THANK YOU.

Thenk you for this apportunity to speak on the designation of Wild and Scenic Rivers in Arizone. My name is Bob Coyle and I am making this statement on behalf of Phelos Dodge Mining Company.

The state of Arizona leads the Nation in mineral production, providing a sound tax base and employment opportunitian for many communities throughout the state, as well as copper and other minerals vital to the Nations well being.

Determining the suitability of Wild and Scenic Rivers in an important process. Phelpe Dodge is concerned that the potential impact of such designation on private property rights, water rights, tax base and scenomic development issues receive full consideration.

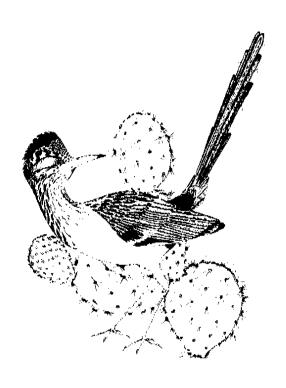
An understanding of what a "Wild and Scenic" designation means must be made clear. The ephere of influence of even the least restrictive designation is not limited to just the river or it's corridor, indeed, the Wild and Scenic Rivers Act can be used to prohibit issuence of required federal permits for any activity within or accurring outside the river carridor that could affect the existing natural conditions including air quality, water quality, sound levels, visual utributes or natural flows within the carridor. In addition, the Act proposes protecting the natural conditions of the river by coordination with state and local agencies that jesses such permits or develop coning regulations. Current multiple use management practices and special status provided to many of these arrase under assating BLM regulations have given us rivers of outstanding natural value. We must determine if designation as "Wild and Scenic" with enhance the value of these rivers enough to offset the impacts of such designation.

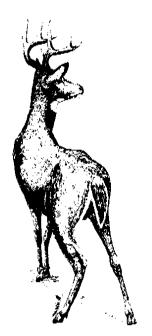
Specifically, Phelps Dodge is opposed to designation of the Lower San Francisco River and the San Pedro River because of their proximity to our existing operations at Morenci and Blebes. Phelps Dodge also opposes the designation of Bonite Creek because of its proximity to potential future operations in this area.

In aummary, Pheips Dodge would like to make the following impacts of designation clear. Any Wild, Scanic or Recreation river designation will restrict present activities and prevent future multiple use of the river corridors and adjacent terrain.

We support the protection of truly superior streem segments, but we feel that this exercise should not result in the prohibition or restriction of existing activates or important future development. The analysis of opportunities foregone because of designation of these river segments in comparison to the unique values that are protected should be cereatily considered. Additionally, the impact on the dustoms and culture of the local community must be considered.

I appreciate the apportunity to make these comments to you.







GRAHAM COUNTY BOARD OF SUPERVISORS

GRAHAM COUNTY COURTHOUSE - 800 MAIN STREET - PHONE 428-3250 SAFFORD, ARIZONA 85546

BUTTHYINGHE DELBERT HOUSEHOLDER, CHAIRMAN TERRY J. BINGHAM, HEAPER HAYNER MOORE, MEMBER

JOE CARTER, COUNTY MANAGER BARBARA FELIX, OLER

MEMO: "Rob Stokes Kip Dinghe Mill Wright John Bryce Rom Hills Breek Posts Gene Greet, HROM: Open Jaksich Haneger

DATE: May LU, 1994

SUBJECT: Wild and Scenic Rivers

Under separate cover each of you should have received a copy of BLM's suitability assessment for Hild and Searce Rivers. Attached for your information and moreover action is the HILD AND SCHIC RIVERS (WOMET MM) 1994. There will be a Forest Public Mearing on Ray 73, 1994 at 7:00 p.m. The bearing will be held in the Little Theater at Eastern Arzican College. Theother.

It is most important that a representative from each of your communities/organizations plan to attend and submit formal comments. You should also mail a capy of your written comments to each member of the Arizona Congressional Delegation and Governor Symington. Attached is a summary of those sizes in the Grahem/Greenies County area which have been proposed. In developing your written comments to it is most important that you focus on social economic face of the comment of the comme

Please insure that your representative attends this important meeting and that you provide written copies to all those identified above.

cc: Board of Supervisors

AN EQUAL OPPOHIUNITY AND AFFIRMATIVE ACTION EMPLOYER

RESPONSES TO STATEMENTS IN THE PUBLIC HEARINGS TRANSCRIPTS

Phoenix Public Hearing (T1):

Response T1 - 1: Please refer to general response # 1 (Alternatives).

Response T1 - 2: In the foreword portion of the document, under the section, Other
Considerations, the statement is made that for the "purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation will be approved" (p. ii). In the case of the Gila Box Riparlan National Conservation Area many management actions are prescribed by P.L.. 101-628 (Arizona Desert Wilderness Act).

Response T1 - 3: The recommended alternative in the final document determines that the two segments of Cienega Creek are suitable and recommends them for designation with a Scenic classification.

Response T1 - 4: Please refer to general response # 1 (Alternatives).

Response T1 - 5: As stated on page 4 of the Bill Williams Legislative Environmental Impact Statement, the Bureau of Land Management has no authority to regulate or zone private lands.

Response T1 - 6: Please refer to general response # 2 (Economic Impacts).

Response T1 - 7: Please refer to general response # 1 (Alternatives).

Response T1 - 8: Please refer to general response # 1 (Alternatives).

Response T1 - 9: Please refer to general response # 3 (Eligibility Determinations).

Response T1 - 10: The Bureau of Land Management has no authority to regulate or zone private lands and would not seek authority to do so. See also general response # 4 (Federal and State Water Rights).

Response T1 - 11: The recommended alternative in the final document determines that the two segments of Cienega Creek are suitable and recommends them for designation with a Scenic classification (general response). Also, see general response # 1 (Alternatives).

Response T1 - 12: Please refer to general response # 1 (Alternatives).

Response T1 - 13: The Bureau of Land Management has rigorously and expeditiously followed the requirements of the environmental compliance process. Over 400 people attended public scoping meetings in March and April, 1993. Twenty-one separate draft legislative environmental impact statements were prepared, printed, and distributed for public review and comment in the 13-month period between April 1993 and April 1994. Over 2,000 copies of the draft document were distributed. The required 60-day public comment period was extended by 30 days to ensure maximum review and comment time. Five public hearings were conducted. These were attended by about 200 people. One hundred-sixteen letters were received on the draft document. We anticipate filing the document with EPA in December 1994. It will be available to the public at the same time.

Response T1 - 14: Please refer to general response # 1 (Alternatives). Locations for such projects as the Great Western Trail could be approved in areas designated as scenic or recreational and, of course, in areas not designated.

Kingman Public Hearing (T2):

Response T2 - 1: Please refer to general response # 5 (Instream Flow Water Rights).

Response T2 - 2: Please refer to general response # 4 (Federal and State Water Rights).

Response T2 - 3: Please refer to general response # 11 (Sultability Determinations).

St. George Public Hearing (T3):

Response T3-1: Under Utah law the state engineer recognizes two types of rights that apply to waters in Utah: perfected and unperfected.

"Perfected Rights" have been applied for, developed, put to beneficial use, and a certificate of right issued by the state engineer. Any rights reserved to the federal government under a wild and scenic river designation would have priority as of the date of designation, and would not affect "perfected" or certificated water rights in Utah.

Certificated water right holders in Utah are entitled to use specific amounts of water at specific locations on a priority that is based on their date of application. When a water user with a senior priority date applies for a change in location or type of use, the state engineer examines the proposal to ensure that no adverse impacts would result to any junior right holders. This examination could result in one of several outcomes, including approval, partial approval, approval with stipulations, or denial.

Should the Utah state engineer recognize a federal reserved water right in Arizona for a wild and scenic river designation, then such designation may have an impact on subsequent transfers, changes in use, or points of diversion of existing water rights.

"Unperfected Rights" are those that have not been developed, put to beneficial use, or certificated by the state water engineer. These have a priority based on date of application. A federal reserved right resulting from wild and scenlc river designation would presumably have a priority based on the date of designation. It is unknown whether "unperfected rights" would be affected. Presumably, any consequences would be determined through either the state engineer's administrative hearing process or through litigation.

Financial costs of impacts on water rights resulting from designation are difficult to predict

and any attempt to do so would be highly speculative. The impacts depend on many variables, including amounts of water available for development, alternative water sources, conversions of water uses, water conservation savings, changes in demands, and many other factors.

One scenario of impacts of designation on Utah communities described in Professor John Groesbeck's statement in the transcript from the St. George, Utah wild and scenic river public hearing (see St George public hearings transcript). While the Bureau of Land Management does not accept all of the assumptions used in Professor Groesbeck's scenario, or his conclusions on impacts that designation of the Arizona portion of the Virgin River would have on Utah, reference to his statement has been incorporated into the final document. The transcript of the St George public hearing also will be forwarded to the Department of the Interior and Congress.

Response T3-2: Please refer to general response # 2 (Economic Impacts).

Response T3-3: Please refer to general response # 3 (Eligibility Determinations).

Response T3-4: Your concern is discussed on page 5 of the draft Virgin River Study Area Legislative Environmental Impact Statement. The discussion concludes that there will be no impact on perfected water rights in Utah, and since any federal reserve water right would be junior to existing unperfected water rights, there will be no significant impact on water rights. Therefore, since an environmental impact statement focusses on significant issues and significant impacts, the draft states that this "issue will not be discussed further". The instream flow study currently underway is not part of this environmental impact statement. Please refer to general response # 3 (Eligibility Determinations).

Response T3-5: Please refer to general response # 3 (Eligibility Determinations).

Response T3-6: Please refer to general response # 3 (Eligibility Determinations).

Response T3-7: Appendix 18 of the Arizona Strip District Resource Management Plan (1991) identifies the Virgin River outstandingly remarkable values. The resource management plan, which involved extensive public review and comment, contains no record of objections to the identified outstandingly remarkable values or suggestions as to others. The record of decision for the resource management plan authorized protective management for the Arlzona portion of the Virgin River administered by The Bureau of Land Management. The protective management has been implemented under the Shlvwits implementation plan.

Response T3-8: Please refer to general response # 11 (Sultability Determinations).

Response T3-9: Please refer to general response # 7 (Multiple Designations).

Response T3-10: Please see response T3-8.

Response T3-11: Please see response T3-8.

Response T3-12: Please see response T3-8.

Response T3-13: The Arizona Strip District
Resource Management Plan, from which the
proposed action was derived, involved extensive
public participation activities. A Notice of Intent
encouraging comments from agencies and the
public on the legislative environmental impact
statement was published in the Federal Register
January 19, 1993. Public scoping meetings
were held in St. George April 16, 1993. The
legislative environmental impact statement
considered the issue of upstream water impacts
and concluded these would not be significant.

Response T3-14: Please refer to general response # 5 (Instream Flow Water Rights).

Response T3-15: Please refer to general response # 2 (Economic Impacts). The final document includes the statement by Professor Groesbeck, identifying it as an evaluation of what could occur as a result of implementation

of the all suitable alternative.

Response T3-16: Please see response T3-1, above.

Response T3-17: Please see response T3-4, above.

Response T3-18: Please see response T3-2, above.

Please refer to general response # 3 (Eligibility Determinations).

Response T3-20: Please refer to response T3-13, above.

Response T3-21: This document is an environmental impact statement written in compliance with 40 CFR 1500, the Council of Environmental Quality Regulations for Implementing the Environmental Policy Act. The guidelines to which you refer do not apply to the preparation of environmental impact statements.

Response T3-22: The record of decision for the Arizona Strip District Resource Management Plan authorized protective management for the Arizona portion of the Virgin River administered by The Bureau of Land Management. The resource management plan, which involved extensive public review and comment, contains no record of objections to the identified outstandingly remarkable values or suggestions as to others. The protective management has been implemented under the Shivwits implementation plan.

Response T3-23: Appendix 18 of the Arlzona Strip District Resource Management Plan (1991) identifies the Virgin River outstandingly remarkable values. The resource management plan, which involved extensive public review and comment, contains no record of objections to the identified outstandingly remarkable values or suggestions as to others.

Response T3-24: Please refer to response T3-23.

Response T3-25: Please refer to general response # 3 (Eligibility Determinations).

Response T3-26: The term, outstandingly remarkable values, was defined in the glossary section of the draft statewide legislative environmental impact statement.

Response T3-27: Please refer to general response # 1 (Alternatives).

Response T3-28: Please refer to general response # 2 (Economic Impacts). The final document includes the statement by Professor Groesbeck, identifying it as an evaluation of what could occur as a result of implementation of the all suitable alternative.

Response T3-29: Please see response T3-2, above.

Response T3-30: Please refer to general response # 1 (Alternatives).

Response T3-31: Please refer to general response # 5 (Instream Flow Water Rights).

Response T3-32: Appendix 18 of the Arizona Strip District Resource Management Plan (1991) identifies the Virgin River outstandingly remarkable values. The resource management plan, which involved extensive public review and comment, contains no record of objections to the identified outstandingly remarkable values or suggestions as to others. The record of decision for the resource management plan authorized protective management for the Arizona portion of the Virgin River administered by The Bureau of Land Management. The protective management has been implemented under the Shivwits implementation plan.

Response T3-33: Please see general response # 10 (Sultability Determinations).

Response T3-34: The recommended alternative recommends the Virgin River for designation as a study river. This is consistent with the record of decision for the Arizona Strip District Resource Management Plan. Please see general response # 1 (Alternatives).

Response T3-35: There is no intent to establish buffer zones. The document clearly states that "Congressional action to include the Virgin River in the National Wild and Scenic Rivers System would not affect the use of private property. Designation does not open private lands to public access. The right to buy and sell property will not be affected" (draft Virgin River Study Area Legislative Environmental Impact Statement, p. 5)

Response T3-36: None of the management actions for the Arizona portions of the Virgin River outside the wilderness area involve road closures.

Tucson Public Hearing (T4):

Response T4-1: Data available to the Bureau of Land Management originating from the Arizona Game and Fish Department, indicate that native fish were collected from Cienega Creek between April of 1974 and April 1976.

Response T4-2: Please refer to general response # 1 (Alternatives).

Response T4-3: Please refer to general response # 1 (Alternatives).

Response T4-4: Please refer to general response # 1 (Alternatives).

Response T4-5: The recommended alternative in the final document determines that the two segments of Cienega Creek are sultable and recommends them for designation with a Scenic classification (general response).

Response T4-6: Please see response T4-5.

Response T4-7: Please see response T4-5.

Response T4-8: Please see response T4-5.

Response T4-9: Please see response T4-5.

Response T4-10: Please see response T4-5.

Response T4-11: Please see response T4-5.

Response T4-12: Please see response T4-5.

Response T4-13: Please refer to general response # 1 (Alternatives).

Response T4-14: Please see response T4-5.

Response T4-15: Please refer to general response # 1 (Alternatives).

Response T4-16: Please refer to general response # 1 (Alternatives).

Response T4-17: After Congress acts to designate a river into the National Wild and Scenic Rivers System, the Bureau of Land Management would develop a river management implementation plan. Approval for this implementation plan would be authorized only after a public comment and review period similar to this document.

Thatcher Public Hearing (T5):

Response T5-1: The Bureau of Land Management would fully comply with the Americans with Disabilities Act. Specific details of this compliance would be addressed in appropriate management plans developed for rivers selected for designation by Congress.

Response T5-2: Please refer to general response # 2 (Economic Impacts).

Response T5-3: Designation of a waterway by Congress under the Wild and Scenic Rivers Act does not affect existing, valid water rights and will not affect private property. The Bureau of Land Management has no authority over private land or to regulate activities occurring on nonfederal land. Designation does not open private land to public access.

Response T5-4: After Congress acts to designate a river into the National Wild and Scenic Rivers System, the Bureau of Land Management would develop a river management implementation plan. Approval for this implementation plan would be authorized only after a public comment and review period similar to this document.

Response T5-5: Please refer to general response # 2 (Economic Impacts).

Response T5-6: Please refer to general response # 7 (Multiple Designations).

Response T5-7: Response T5-7: The term "downstream," in connection with water rights acquisition, has been eliminated in the final document. The acquisition of existing water rights would be pursued only on a "willing seller-willing buyer basis" and would be implemented regardless of wild and scenic river designation.

Response T5-8: Please see general responses # 2 (Economic Impacts), and # 4 (Federal and State Water Rights).

Response T5-9: Please see general response # 1 (Alternatives).

Response T5-10: Please see general response # 6 (Land Acquisition).

Response T5-11: After Congress acts to designate a river into the National Wild and Scenic Rivers System, the Bureau of Land Management would develop a river management implementation plan. Approval for this implementation plan would be authorized only after a public comment and review period similar to this document.

Response T5-12: Please see general response # 2 (Economic Impacts).

Response T5-13: Please see general response # 7 (Multiple Designations).

Response T5-14: Please see general response # 1 (Alternatives).

Response T5-15: The Bureau of Land Management would fully comply with the Americans with Disabilities Act. Specific details of this compliance would be addressed in appropriate management plans developed for rivers selected for designation by Congress.

Response T5-16: Please refer to general response # 1 (Alternatives).

Response T5-17: Section 6 of the Wild and Scenic Rivers Act authorizes several types of

actions, each subject to the approval of the Secretary of the Interior. Addressing and discussing these types of possibilities is beyond the scope of this document. It can be assumed that any actions of the Bureau of Land Management subsequent to a Congressional decision to designate a waterway to the National Wild and Scenic Rivers System would be consistent with resource management plans.

Public Involvement is required in the development of a resource management plan.

Response T5-18: Please refer to general response # 1 (Alternatives).

Response T5-19: Please refer to general response # 1 (Alternatives).

Response T5-20: Please refer to general response # 1 (Alternatives).

Response T5-21: Please see response T5-3, above.

Response T5-22: Please refer to general response # 1 (Alternatives).

Response T5-23: Please refer to general response # 1 (Alternatives).

Response T5-24: Please refer to general response # 2 (Economic Impacts).

GENERAL RESPONSES TO COMMENTS IN THE PUBLIC HEARINGS AND LETTERS

There are 14 general responses.

General response # 1: Alternatives

As stated on page 9 in the draft statewide document, the legislative environmental impact statement is not a decision document; it is a component part of the decision making package.

The Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act issued by the Council on Environmental Quality (40 CFR 1500) require that environmental impact statements contain a range of reasonable alternatives, including no action. In the environmental impact statement each alternative must be described and the impacts of its implementation analyzed. 'The range of alternatives discussed in environmental impact statements shall encompass those to be considered by the ultimate decisionmaker" (43 CFR 1502.2(e)).

The regulations also state that the "agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action" (43 CFR 1502.9(a)).

The proposed action/recommended alternative selected by the Bureau of Land Management was chosen from alternatives described and analyzed in the 1993 Suitability Assessment document which is available for public review at Bureau of Land Management field offices and many public libraries in Arizona, Utah, and New Mexico.

Congress may select any alternative, or combination of alternatives in its decision on rivers to be included in the National Wild and Scenic Rivers System.

General response # 2: Economic Impacts

The conclusion that there would be no

significant economic impacts from implementing any of the alternatives was based on a review of factors considered relevant by BLM personnel.

These consisted of the following:

- No significant economic impacts from wild and scenic river eligibility determinations were identified in any of the resource management plans or amendments prepared between 1985 and 1994;
- No significant economic impacts were identified in any of the Bureau of Land Management Sultability Assessments prepared in 1993;
- None of the alternatives provide for Bureau of Land Management action to acquire or dispose of federal land;
- None of the alternatives provide for Bureau of Land Management action to acquire or dispose of existing water rights;
- None of the alternatives provide for Bureau of Land Management action to acquire or dispose of mineral rights;
- 6) None of the alternatives provide for Bureau of Land Management action to discourage or prevent the filing of water rights on non-federal land;
- None of the alternatives provide for any kind of Bureau of Land Management action on nonfederal land;
- 8) Congressional designation of an Arlzona river, by itself, would not cause a noteable increase in tourism, based on the visitor use totals in wilderness areas:
- 9) Since Bureau of Land Management already is managing the subject areas under one or more land use plans, Congressional designation would not involve any major changes; and,
- 10) The likelihood is minimal for wild and scenic river designation, by itself, to have any direct or indirect effects on real estate values, commercial activities, or industrial production.

General response # 3: Eligibility Determinations

In accordance with the Bureau of Land Management Planning Regulations (43 CFR 1600) and Bureau of Land Management Manual Section 8351, eligibility determinations are made during the resource management planning process.

This process of determining eligibility, identified in Bureau of Land Management Manual Section 8351.31, was described on pages 9 and 10 of the Arizona Statewide Wild and Scenic Legislative Environmental Impact Statement. In each of the planning documents in which eligibility was determined, review and comments by agencies and the public was encouraged.

In order to change existing eligibility determinations, it would be necessary to prepare a resource management plan amendment which would involve public review and comment.

General response # 4: Federal and State Water Rights

Two types of water rights are addressed in this document: state appropriative rights and federal reserved rights.

State water rights are acquired through the state appropriative process. Traditionally these have been separated into surface rights (including instream flow rights) and ground water permits. Both require that the water be put to beneficial use. Beneficial use, defined under state law, includes the support of traditional human endeavors such as agriculture, mining, or domestic as well as stockwatering and wildlife uses.

A federal reserved water right is established by Congress when it sets aside a parcel of federal land for a specific purpose, such as for an indian or military reservation, national park, wilderness area or wild and scenic river. This right may be either implied or specifically identified, as in the Arizona Desert Wilderness Act (P.L. 101-628). The quantity of water reserved can be only the minimum amount

necessary to fulfill the primary purposes of the reservation and the priority date of such a right is the date of the enactment of the reservation.

Federal and state water rights are quantified and asserted during state judicial proceedings called adjudications. Water rights are adjudicated by priority date with the oldest water right having first call on the available water supply.

Often, in Arizona, there are more water rights than available water. When this is the case a river or water source is considered overallocated. Stream flow in Arizona is extremely variable from season to season and from year to year and some junior water rights may be filled only in extremely wet years.

General response # 5: Instream Flow Water Rights

Instream flow water rights, recognized under Arizona state law, are considered non-consumptive since no water is diverted from the stream channel. Instream beneficial uses include wildlife, flsh, and recreation.

The Bureau of Land Management has filed for state instream flow water rights on many of the river segments included in this document. In addition, the Arizona Desert Wilderness Act (P.L. 101-628) established a federal reserved right for those portions of the rivers flowing through wilderness. The priority date of these rights in wilderness areas will be senior to any water right granted under wild and scenic rivers designation.

The Arizona Department of Water Resources requires a detailed assessment report in order to perfect an instream flow right. The assessment must quantify the amount of water needed by each of the beneficial uses in relation to water availability (i.e., the minimum base flow of the river). Valid rights along the stream are identified and an assessment made of possible impacts to existing users. The Bureau of Land Management is using this same instream flow assessment process to quantify its federal instream flow reserved rights.

General response # 6: Land Acquisition

Land acquisition is not a wild and scenic rivers management action, and is not part of any proposal to designate a wild and scenic river. Land acquisitions, where mentioned, are identified as ongoing management actions authorized by resource management plans approved by the Arizona State Director. The land acquisition efforts will continue regardless of Congressional wild and scenic river designations.

This is consistent with regulations and policy stipulating that that Bureau of Land Management land acquisitions must be in conformance with land use plans that are subject to public review and comment (Federal Land Policy and Management Act, P.L. 94-579, Sec 202; 43 CFR 1600; 43 CFR 2200). Public review and comment was encouraged in each of the land acquisitions identified in the resource management plans.

General response # 7: Multiple Designation

Management procedures where multiple designations may exist are discussed for each alternative that addresses wild and scenic management actions (see chapter 2 in each document). In the case of overlap, the most stringent procedural option is selected.

The location of a river segment, or the kind of plan under which it is managed (wilderness, national conservation area, area of critical environmental concern, resource management plan), do not limit or enhance its status as a potential wild and scenic river.

As stated in chapter 1 of the statewide document, the Wild and Scenic Rivers Act requires consideration of "potential national wild, scenic and recreational river areas" on all "planning for the use and development of water and related land uses..."

The process of considering and evaluating rivers that are potential additions to the National Wild and Scenic Rivers System begins with eligibility determinations. Bureau of Land Management policy specifies that to be eligible

"a river segment must be 'free-flowing' and must possess at least one river-related value considered to be 'outstandingly remarkable.' ... No other factors are considered in determining the eligibility of a river segment" (Manual Section 8351.31A, Wild and Scenic Rivers — Policy and Program Direction for Identification, Evaluation, and Management).

Designation determinations, similarly, are not limited or enhanced by the management status of a river. In other words, the potential for a river segment to be recommended to Congress for inclusion in the National Wild and Scenic Rivers System has nothing to do with whether the segment is in a wilderness or national conservation area.

In addition, if a segment in a wilderness or national conservation area is designated by Congress, a river management plan must be developed. If the designation overlaps an area managed as wilderness, or a riparian national conservation area, there would be no conflict with implementing the required wild and scenic river management actions. The most stringent action would be implemented. Management planning efforts for Wild and Scenic Rivers within overlapping existing designations. according to Bureau of Land Management policy, "must be consistent with the expressed administrative purpose(s) or controlling statutory intent(s) of the existing designation, e.g., wilderness area" (MS 8351.08). Also. "[m]anagement of WSR rivers which overlap designated wilderness areas or wilderness study areas will meet whichever standard is highest. If an area is released from wilderness study status and the associated Wilderness Interim Management Policy, the applicable WSR river classification guidelines and standards would then apply" (MS 8351.51D1).

General response # 8: Cienega Creek Recommended Alternative

The recommended alternative in the final document determines that the two segments of Cienega Creek are sultable and recommends them to Congress for designation with a Scenic classification.

The selection of this alternative is consistent with the Cienega Creek eligibility determination, sultability assessment alternatives, and analysis in the draft Cienega Creek Wild and Scenic River study area legislative environmental impact statement.

General comment # 9: River Study Area Protection

This document is focussed on the environmental impacts that could occur under the implementation of various river study area alternatives. The alternatives respond to issues identified during scoping by the public and Bureau of Land Management personnel.

As discussed on page 59 of the draft statewide document, the designation or non-designation of the rivers would not occur in a vacuum. The lands and resources in the river study areas already are, and regardless of Congressional designation decisions, will continue to be managed under ongoing Arizona Bureau of Land Management resource management plans.

The Wild and Scenic Rivers Legislative Environmental Impact Statement does not equate the specifics of one type of legislative protection with another. However, areas under legislative protection are comparable in one important way: since Congress creates the protective status, only Congress can revoke it.

Different purposes are served by the three types of legislative protection mentioned in this document. The Wilderness Act states that the purpose of administering a wilderness area is to leave it "unimpaired for future use and enloyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness" (P.L. 88-577, Sec 2(a)). The Arizona riparian national conservation areas generally are established to conserve, protect, and enhance the riparian areas ... and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area" (P.L. 101-628, Sec 201(a). As mentioned on page 9 of

the statewide document, the purpose of the National Wild and Scenic Rivers Act is to preserve in "free-flowing condition" and to protect for the "benefit and enjoyment of present and future generations ... certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values" (P.L. 90-542, Sec. 1(b)).

The Bureau of Land Management activities must conform to, and comply with, special Congressional protection directives. Some of these pertain directly to waterways. For example, wilderness and national conservation area designation conveys a federal reserved water right; required prohibitions on the use of motorized equipment is a deterrent to dam construction and waterway diversion. Other requirements provide protection for resource values: new mining activities are prohibited; motorized vehicle use is restricted; public use is regulated; new road and trail construction is banned.

General response # 10: Comparisons

The Arizona statewide legislative environmental impact statement is focussed on the analysis of environmental impacts that could occur from implementation of various alternatives for river study area wild and scenic river designations (draft document, p. 9). Existing wilderness and national conservation areas are parts of the environment that would be affected by implementation of the alternatives that recommend wild and scenic river designation or nondesignation.

Due to the focus of the document, comparing the degrees or type of protection associated with resource management under the Congressional designations of wilderness, national conservation, and wild and scenic rivers would be pointless because the Congressionally profected areas would not be subject to, nor would they generate, significant adverse impacts.

General response # 11: Suitability Determinations

The sultability determination process, incorporating the directives listed in Bureau of Land Management Manual Section 8351.33, was discussed on pages 10 and 11 in the draft statewide legislative environmental impact statement. According to the manual, "[t]he planning determination of suitability provides the basis for any decision to recommend legislation... In most cases, BLM will assess river suitability in the RMP process ... Where a suitability determination cannot be made by the BLM in the RMP, [a] separate legislative EIS (LEIS) shall be required ... to make that determination ... [A]ll eligible river segments are evaluated for suitability ...(MS 8351.33)

With the exception of the Paria River, management decisions were made to defer sultability determinations on Bureau of Land Management rivers during the completion of resource management plans and resource management plan amendments between 1983 and 1993. This, in turn, provided the basis for the preparation of the internal sultability reports and the preparation of the legislative environmental impact statement.

The suitability assessments were completed in 1993. The suitability assessments evaluated all river segments determined to be eligible through the resource management planning process.

The alternatives in the sultability reports established the basis for the range of alternatives to be analyzed in the environmental impact statement. The reports did not constitute the final sultability determination of the agency.

The availability of the suitability assessments was announced in written notifications to approximately 1,000 people and in statewide press releases. Copies of the assessments were provided for review in public libraries and Bureau of Land Management field offices.

Chart 1-1 of the draft statewide legislative environmental impact statement contains a

summary of characteristics for each river included in the Bureau of Land Management proposed action alternative. Chart 1-1 does not contain information on any of the other alternatives considered in the suitability assessment.

General response # 12: Visual Impacts

The Wild and Scenic River Act does not give federal agencies authority to regulate the use of nonfederal lands. The visual quality of existing activities on nonfederal lands adjacent to a wild and scenic river is not a consideration determining eligibility. According to Bureau of Land Management manual section 8351, Wild and Scenic Rivers — Policy and Program Direction for Identification, Evaluation, and Management, "a river segment must be 'free-flowing' and must possess at least one river-related value considered to be 'outstandingly remarkable' No other factors are considered in determining the eligibility of a river segment"

In addition, the visual quality of existing activities on nonfederal lands adjacent to a wild and scenic river is not one of the considerations in determining suitability. Further, the Wild and Scenic River Act does not give federal agencies authority to force changes in the existing activities on nonfederal lands.

General response # 13: Water Rights Severance and Transfer

The point of diversion of a state appropriative right may be changed through a process called severance and transfer. This process is approved by the Arizona Department of Water Resources. The process examines impacts to valid water rights between the severance and transfer points. Water rights holders who believe they are adversely affected by this action have the right of protest to the department.

Any existing right on a drainage, including instream flow rights, could impact the execution of the severance and transfer. For example, if a mining company wanted to buy a water right from a downstream location and transfer the

diversion point upstream of an instream flow water right, the holder of the instream flow right could be impacted and could protest the action.

No proposals for severance and transfer involving river segments under consideration in this document are currently before the Department of Water Resources.

General Response # 14: The Virgin River and Utah Perfected and Unperfected Water Rights

Under Utah law the state engineer recognizes two types of rights that apply to waters in Utah: perfected and unperfected.

"Perfected Rights" have been applied for, developed, put to beneficial use, and a certificate of right issued by the state engineer. Any rights reserved to the federal government under a Wild and Scenic River designation would have priority as of the date of designation, and would not affect "perfected" or certificated water rights in Utah.

Certificated water right holders in Utah are entitled to use specific amounts of water at specific locations on a priority that is based on their date of application. When a water user with a senior priority date applies for a change in location or type of use, the state engineer examines the proposal to ensure that no adverse impacts would result to any junior right holders. This examination could result in one of several outcomes, including approval, partial approval, approval with stipulations, or denial.

Should the Utah state engineer recognize a federal reserved water right in Arizona for a wild and scenic river designation, then such

designation may have an impact on subsequent transfers, changes in use, or points of diversion of existing water rights.

"Unperfected Rights" are those that have not been developed, put to beneficial use, or certificated by the State Water Engineer. These have a priority based on date of application. A federal reserved right resulting from wild and scenic river designation would presumably have a priority based on the date of designation. It is unknown whether "unperfected rights" would be affected. Presumably, any consequences would be determined through either the state engineer's administrative hearing process or through litigation.

Financial costs of impacts on water rights resulting from designation are difficult to predict and any attempt to do so would be highly speculative. The impacts depend on many variables, including amounts of water available for development, alternative water sources, conversions of water uses, water conservation savings, changes in demands, and many other factors.

One scenario of impacts of designation on Utah communities described in Professor John Groesbeck's statement in the transcript from the St. George, Utah wild and scenic river public hearing (see St George public hearings transcript). While the Bureau of Land Management does not accept all of the assumptions used in Professor Groesbeck's scenario, or his conclusions on Impacts that designation of the Arizona portion of the Virgin River would have on Utah, reference to his statement has been incorporated into the final document. The transcript of the St George public hearing also will be forwarded to the Department of the Interior and Congress.

LETTERS AND BUREAU OF LAND MANAGEMENT RESPONSES

During the 90-day comment period from April 8 to July 8, 1994, 116 letters containing comments on the draft document were received. Copies of the letters and transcripts from the public hearings are printed below. After the comment period ended, two letters, both with July 26 dates, were received. Although responses were not prepared for these, they are included as information.

The letters are numbered sequentially in order of receipt, but but they are displayed in groups

according to source as follows:

Letters from federal agencies; Letters from state agencies; Letters from local governments; Letters from interest groups; Letters from individuals; Letters received after the close of the comment period.

Table CR-3 lists the letters alphabetically by author.

TABLE 5-CR3 LETTERS FROM INDIVIDUALS

			
NUM	NAME	REPRESENTING	CITY
44	Albright, S.T.	U.S. National Park Service	San Francisco, CA
19	Anderson, J.S.	Private	Tucson
61	Arnquist, P.	Private	Phoenix
94	Baison, A.L.	Private	Tueson
99	Beatson, R.R.	League of Conservation Voters	Tueson
96	Becker, S.	Private	Scottsdale
110	Beilfuse, C.D.	Private	Phoenix
109	Blake, D.	Private	St. George, UT
102	Blake, D.	Private	St. George, UT
38	Bruns, M.A.	Private	Baraboo, WI
115	Burton, J.K.	Arizona Game and Fish Department	Phoenix
25	Byerley, L.	Private	Tucson
43	Cabin, S.W.	Citizens' Coalition for Arizona Rivers	Tucson
39	Cabin, S.W.	Private	Tucson
42	Cassidy, R. and D.	Private	Tucson
104	Clawson-Damp, Turner	Sierra Club/Southwest	Phoenix
35	Cooper, L.K.	Daughton, Hawkins, et al	Phoenix
36	Darling, L.A.	Cyprus Amax	Englewood, CO
82	Darling, L.	Сургив Атах	Englewood, CO
108	Drury, J.A.	Stone Container Corp	Snowflake

68	Eady, C.F.	Private	Safford
34	Ellickson, B.	Private	Glendale
во	Elmer, H.	Private	Safford
21	Essig, J.J.	Private	Tucson
79	Farrel, D.	U.S. Environmental Protection Agency	San Francisco, CA
112	Fischer, D.	Private	Willcox
81	Flood, T.J.	Friends of Arizona Rivers	Phoenix
103	Frankel, Z.	Southern Utah Wilderness Alliance	Salt Lake City, UT
83	Frehner, V.	Scenic Improvement District	Mesquite
37	Genser, R.	Private	Tucson
58	Glustrum, L.	Private	Prescott
70	Gundlach, D.	Private	Tucson
93	Hanson, G.S.	Private	St. George, UT
55	Hernder, H.	Private	Tucson
30	Hibpshman, M.H.	Bureau of Mines	Denver, CO
59	Hopkins, J.	Private	Tucson
40	Householder, D. and Moore	Graham County Supervisors	Safford
49	Householder, Moore and Bingham	Graham County Supervisors	Bafford
111	Huddy, P.W.	Private	Tucson
84	Huizingh, D.	Central Arizona Paddlers Club	Phoenix
27	Hulmes, D.	Private	Prescott
51	Hyde, P. and G. Peters	American Rivers	Phoenix
9	Ingvoldstod, M.	Private	Tucson
86	Innes, L.	Mayor	Thatcher
62	Ivantosh, B.	Private	Tucson
11	Jeffetz, B.	Environmental Goods	Tueson
17	Jimmerfield, E.S.	Sonoran Bioregional Project	Tucson
116	Joe, R.S.	Department ofthe Army/ Corps of Engineers	Los Angeles, CA
1	Johnson, M.	Private	Tucson
71	Kahl, R.G.	Private	Tucson
48	Keller, G.	ASA4WDC	Tempe
47	Keiler, G.	ASA4WDC	Tempe

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65 Kennedy, G. Private Safford 77 Keske, F.E. Private Pima 98 Kevin, J. Private Apache Jun 22 Keyes, Jr. C.J. International Boundary Water Commission El Paso, TX 101 Kimball and Curry, Atts Phelps Dodge Phoenix 8 Kobe, C.M. Private Tucson 113 Koppinger, D. Tucson Audubon Society Safford 14 Kroese, K.W. O'Connell & Kroese, PC Tucson 15 Lanchlou, P. Private Tucson 16 Lazzelle, T. Sierre Club/Palo Verde Group Phoenix 17 Les, A.N. Apache County Board of Supervisors Globe 18 Levick, L. Private Tucson 19 Liebold, R.L. Sierre Club/Grand Canyon Kingman 19 Lockner, D. Private Klondyke 10 Manager Arizona Department of Commerce/Clearing House 10 Marsik, G.A. Worldwide Exploration Flagstaff 4 Mazanek, S. San Pedro Water Conservation District Benson 89 McCrary, R. Private Tucson 10 Millar, R.G. Foresta Institute Tucson	
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16 Mudge, N. SEAC-Southwest Tucson	
24 Nash, K. Private Tucson	
18 Nelson, D.K. Private Tucson	
26 Otero, D.G. Private Lakeside	
46 Palmer, S. Private Tucson	
33 Pamperin, J. Private Phoenix	
15 Pelich, W. and D. Privata Tucson	
92 Palusi, J. Private Glendale	
69 Prendergast, R. Private Sun City	

74	Rea, B. and J.	Private	Eugene, OR
56	Richardson, W.F.	Greenlee County Water Association	Morenci
52	Richgels, T.	Private	Mesa
32	Riddle, D.L.	Private	Chandler
41	Ridinger, D.C.	Arizona Mining Association	Phoenix
72	Rigge, C.R.	Private	Tucson
31	Roberts-Manolakis, S.	Private	Tucson
63	Romney, P.	Arizona Trappers Association	Safford
5	Rosinski, G.F.	Private	Tucson
98	Ruedas, H.	Greenlee County Board of Supervisors	Morenci
7	Schlossberg, M.	Private	Tucson
54	Serragho, R.	Private	Tucson
67	Skinner, L.	Mayor	Pima
97	Snider, T.R.	Phelps Dodge	Morenci
60	Sowie, W.W.	Private	Phoenix
106	Steuter, D.	Private	Phoenix
20	Taunton, S.	Private	Tucson
23	Tepper, C.	Private	Tucson
3	Thomas, J.W.	U.S. Forest Service	Washington, D.C.
2	Thompson, R.	Washington County Water Conservancy District	St. George, UT
45	Thornton, D.H.	Morenci Water/Electric	Morenci
100	Travis, R.C.	Greenies County	Morenci
78	Vlahovich, J.E.	Cochise County Planning Department	Sierra Vista
64	Walters	Graham County Chamber of Commerce	Safford
6	Williams, B.	Private	Prescott
88	Williams, H.	Private	Tucson
96	Wilson, K.	Private	Mesa
107	Wilson, B.B.	Private	Tucson
13	Wilson, B.B.	Private	Tucson
12	Wolf, D.	Private	Flagstaff
90	Zeilman, T.A.	Private	Tucson

Letters from federal agencies

Forest Service

14th & Independence SW 2.0. Box 96090 Washington, DC 20090-6030

Reply To: 2354

Date: APR 2 0 (384

State Director, Arixona State Office Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

Dear Mr. Rosenkrance:

Mr. Lester K. Rosenkrance

Thank you for your March 31, 1994, letter mending a copy of your Draft Arizona Statewids Mild and Scenic Rivers Legislative Environmental Impact Statement for our review.

He are referring your report to the Pactreation, Heritage, and Wilderness Resources Staff for review, and they will provide an appropriate response by July 7, 1994, &s you requested.

Sincerely.

JACK HARD THOMAS

Chief

Caring for the Land and Serving People

75-4100-12M-0-02D

000022

INTERNATIONAL BOUNDARY AND WATER COMMISSION UNITED STATES AND MEXICO

JUN 2 1994

Nr. Phil Moreland
Chief
Branch of Planning
Environment, Lands and Recreation
Arizona State Office
Bureau of Land Management
P.O. Box 16563
Phoenix, Arizona 85014

Dear Mr. Moreland:

We appreciate the opportunity to review and comment on the Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (DEES) dated April, 1994, reference 1790 (931) and 8351 (931). The DEIS analyzes the environmental impacts of recommending to Congress 13 rivers within the State of Arizona as suitable for inclusion in the National Wild and Scenic Rivers System. In 1993 we provided comment to the Bureau of Land Management (BLM) for five of the rivers under consideration, Aqua Fria River (letter dated Juna 21), Bill Williams River (Aquat 4), Ciences Creek (April 16), Nassayampa River (June 21), and San Pedro River (April 16).

As we stated at those times, the United States Section of the International Boundary and Water Commission (USIBWC), by virtue of the 1944 Water Treaty (TS 994; 59 Stat. 1219) and other boundary and water treaties and agreements concluded by the United States and Mexico, is responsible for ensuring the United States Government meets the obligations incurred in those agreements. The USIBWC's statutory authority for carrying out actions in the United States under these agreements rests in 22 U.S.C. 277 a-d.

In our letters of comment on the proposed evaluation for eligibility for the Aqua Fria River, the Bill Williams River, and the Hassayampa Aiver, we recommended that treaty obligations relating to water quality and deliveries to Maxico be considered in your decisions since the flows of these rivers enter the Colorade River and are sometimes calculated into the treaty deliveries to Mexico. Our review of the main DEIS and the River appendices indicates the only reference made to the Treaty of February 1, 1944, "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" is found in the Bill Williams River DEIS in River Appendices Volume 1. The treaties and international agreements in force between the United States and Maxico also apply, as we stated in our earlier letters, to

THE COMMONS, BUILDING C. SUITE 310 . 417: N. MESA STREET . EL PASO, TEXAS 79902 (915) 534-6700 . IFTS) 570-6700

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those waters of the Aqua Fria and Hassayampa rivers; and we believe this reference to treaties and international agreements between the United States and Mexico should also be made within the main DEIS.

The discussion on the 1944 Water Treaty in the third paragraph, first column, on page 3 of the Bill Williams River DEIS in River Appendix Volume 1 is in the past tense. Be advised this 1s a treaty in force between the United States and Mexico. Naters continue to be distributed between the two countries with a quaranteed annual quantity of 1.85 thousand cubic meters (1.5 million acre faet) provided to Mexico in accordance with the 1944 Water Treaty.

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We also find the "International Boundary and Waters [sic] Commission" is listed on page 21 of the main DEIS; however, it is not found within the Consultation and Coordination with Federal Agencies listing on page 125 of the main DEIS. The proper reference should be, "United States Section, International Boundary and Water Commission, United States and Mexico" and the abbreviation, "USIBWC," is appropriate following first reference.

Thank you for providing us the opportunity to review the DEIS and River Appendices and for taking our comments into consideration. Please provide two copies each of the final EIS and River Appendices when they are available. Also provide one copy each of these documents to Nr. Al Goff, Project Manager, United States Section, International Boundary and Water Commission, P.O. Box 5737, Yuma, Arizona 85364, telephone: 602/782-1598 and to Mr. Carlos Pena. Project Manager, United States Section, International Boundary and Water Commission, P.O. Box 6759, Nogsles, Arizona 85521, telephone: 602/281-1892.

Sincerely,

Or Conrad G. Keyes, Jr. Principal Engineer, Planning

CC: Colorado River Salinity Control Forum

Response 22 - 1: References to the responsibilities of the International Boundary and Water Commission have been added to River Appendix Volume, Section I.C., for the Agua Fria and Hassayampa rivers.

Response 22 - 2: The present tense is used in the final text.

Response 22 - 3: Reference to the USIBWC has been added to the appropriate pages in the final statewide document and appendices.

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Reference: \$560 (931) and 8351 (931)

Dear Mr. Curtis:

We appreciate Mr. Kast's July 9, 1993, letter providing a copy of the draft Amendment to the Yuma District Resource Management Plan Environmental Assessment [EA] No. AZ-050-93-82 for our review and comment. The Bureau of Land Management [BLM] proposes to evaluate the eligibility of a portion of the Bill Williams River for inclusion in the National Wild and Scenic Rivers System. The segment, designated by BLM as Segment c, is a free flowing, 8 kilometers (5 miles) long portion of the Bill Williams River between Alamo Dam and Planet Ranch.

As you are aware, the United states Section of the International Boundary and Water Commission (USIEWC), by virtue of the 1944 water Treaty (TS 994; 59 Stat. 1219) and other boundary and water treaties and agreements concluded by the United States and Mexico, is responsible for ensuring that the United States Government meets the obligations incurred in those agreements. The USIEWC's statutory authority for carrying out actions in the United States under these agreements rests in 22 U.S.C. 277 a-d.

The Treaty of February 3, 1944, for "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" distributed between the two countries the waters of the Rio Grande and the Colorado River. The 1944 Treaty provides a guaranteed annual quantity of 1,850,250 thousands of cubic meters (2.5 million accordance with schedules formulated in advance by Mexico within specified limitations, and it also provides any other waters specified limitations, and it also provides any other waters arriving at the Mexican points of diversion under certain understandings. These deliveries are made to Mexico by the USIBWC at Morelos Dam on the Colorado River near Yume, Arizona, and on the land boundary at San Luis, Arizona/Sonora. Releases are made from upetream reservoirs to assure that treaty obligations reach Morelos Dam for diversion by Mexico.

On August 30, 1973, the United States and Mexico reached agreement under the terms of the 1944 Water Treaty for a "Permanent and Definitive Solution to the International Problem of the Salinity of the Colorado River" (International Boundary and Water Commission Minute No. 242). This Minute provided for

immediate reduction in the salinity of the waters delivered to Mexico, stipulating that the United States shall adopt measures to assure that the waters delivered upstream of Morelos Dam have an annual average salinity of no more than 115+30 parts per million over the annual average salinity of the Colorado River at Imperial Dam.

Immediate interim measures were put into affect under the authorization of the Colorado River Salinity Control Act of June 24, 1974. The United States Bureau of Reclamation constructed works which bypessed all of the saline drainage waters to the Santa Clara Slough in Newico on the Gulf of California. Waters of low salinity were substituted for the bypassed waters.

Compliance with the agreement is jointly monitored by the USIBWC and Mexican Section of the International Boundary and Water Commission (KXIBWC). The waters delivered upstream from Morelos Dam are jointly sampled each weekday, and they are analyzed for salinity by the USIBWC and the MXIBWC, and the results are jointly compared by the International Boundary and Water Commission. Since the agreement was signed, the records show that the United States is fully complying with its terms.

It was recognized that to continue the interim measures to implement the agreement with Nexico would result in a serious loss of waters needed to meet Colorado River Basin uses within the United States. The Salinity Control Act authorized the construction, operation and maintenance of a desalting plant in the United States to reduce the salinity of the drain waters. The Yuma Desalting Plant is now constructed and was placed into operation from October to Decamber 1992. Ploods from the Gila River have made it unnecessary to utilize the plant in 1993.

The USIBWC takes this opportunity to inform you of these treaty obligations, and to request that they be taken into consideration in your evaluation of eligibility for Segment C of the Sill Williams River. Since the flows or this river enter the Colorado River, these waters are sometimes used for and calculated into the treaty deliveries the USIBMC must make to Maxico. We recommend that these required treaty deliveries be considered in your decision,

The USIBWC is prepared to work with you in providing the treaty obligation flow information you might heed for your evaluation. The USIBWC contacts for this information are Mr. Ken Rakestraw, Deputy Division Engineer, Water Resources Investigation Division, at the letterhead address, telephone: 915/514-6707; and Mr. Al Coff. Project Manager, U.S. Section, International Boundary and Water Commission, P.O. Box 5717, Yuma, Arizona 85164, telephone: 602/782-1598.

Sincerely,

Conrad G. Reyes, Jr. Principal Engineer, Planning

cc: Mr. Herman L. Kast Deputy State Director Lands and Renewable Resources Bureau of Land Management Arizona State Office P.O. Box 16563 Phoenix, Arizona 05011

> Colorado River Salinity Control Forum U.S. Bureau of Reclamation, Yuma

JUN 2 1 1993

Ms. Gail Acheson Area Manager Phoenix Resource Area Bureau of Land Management 2015 West Deer Valley Road Phoenix, Arizona 85027

Dear Ma. Acheson:

We appreciate the opportunity to review Mr. Ecclure's May 18, 1991, letter providing a copy of the draft Amendment and Environmental Assessment (EA) for the Phoenix Resource Management Plan and Lower Gila North Management Framework Plan for our review and comment. The Bureau of Land Management (BLM) proposes to evaluate the sligibility of portions of the Agus Fria and Hassayampa Rivers for inclusion in the National Wild and Scenic Rivers System.

As a matter of information, the United States Section of the International Boundary and Nater Commission (USIBNC), by virtue of the 1944 Water Treaty (TS 994; 59 Stat. 1219) and other boundary and water treaties and agreements concluded by the United States and Mexico, is responsible for ensuring that the United States Government neets the obligations incurred in those agreements. The USISHC's statutory authority for carrying out actions in the United States under these agreements rests in 22 U.S.C. 277 a-d.

The Treaty of February 3, 1944, for "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" distributed between the two countries the waters of the Ric Grande and the Detwean the two countries the waters of the Ric Glands and Colorado River. The 1944 Treaty provides a guaranteed annual quantity of 1,850,350 thousands of cubic meters (1.5 million acre-feet) of the Colorado River waters be delivered in accordance with schedules formulated in advance by Mexico within specified limitations, and it also provides any other waters arriving at the Mexican points of diversion under cartain understandings. These deliveries are made to Mexico by the USISMC at Morelos Dam on the Colorado River near Yuma, Arizone, and on the land boundary at San Luis, Arizona/Sonora. Releases are made from upstream reservoirs to assure that treaty obligations reach Morelos Dam for diversion by Nexico.

On August 30, 1973, the United States and Mexico reached agreement under the tarms of the 1944 Mater Treaty for a "Permanent and Definitive Solution to the International Problem of the Salinity of the Colorado River" (International Boundary and Water Commission Ninute No. 242). This Minute provided for immediate reduction in the salinity of the waters delivered to Mexico, stipulating that the United States shall adopt measures to assure that the waters delivered upstream of Morelos Dam have an annual average salinity of no more than 115430 parts per million over the annual average salinity of the Colorado River at Imperial Dem.

Immediate interim measures were put into effect under the authorization of the Colorado River Salinity Control Act of June 24, 1974. The United States Bureau of Recleaation constructed works which bypassed all of the saline drainage waters to the Santa Clara Slough in Mexico on the Gulf of California. Waters of low salinity were substituted for the bypassed waters.

Compliance with the agreement is jointly monitored by the USIBWC and Mexican Section of the International Boundary and Water Commission (MXIBWC). The waters delivered upstream from Korelos Dam are jointly sampled each weekday, and they are analyzed for salinity by the USIBWC and the KIBWC, and the results are jointly compared by the International Boundary and Nater Commission. Since the agreement was signed, the records show that the United States is fully complying with its terms.

It was recognized that to continue the interim measures to implement the agreement with Mexico would result in a serious loss of waters needed to meet Colorado River Basin uses within the United States. The Salinity Control Act authorized the construction, operation and maintenance of a desaiting plant in the United States to reduce the salinity of the drain waters. The Yuma Desaiting Plant is now constructed and is presently undergoing startup studies at one-third operation through 1994.

The USIBMC takes this opportunity to inform you of these treaty obligations, and to request that they be taken into consideration in your evaluation of eligibility for the subject rivers. Since the flows of the designated rivers enter the Painted Rock Reservoir and subsequently to Colorado River via the Gila River, these waters are sometimes used for and calculated into the treaty deliveries the USIBMC must make to Mexico. We recommend that these required treaty deliveries be considered in your decision.

You state in the assessment on page 5, last paragraph, that no flood control dams, levees or other works would be allowed and only existing structures would be maintained. Considering the

devastating floods of the Gila River in 1993, we recommend not ruling out the possibility of flood control works in the future along the Gila and its tributaries.

The USIBWC is prepared to work with you in providing the treaty obligation flow information you might need for your evaluation. The USIBWC contacts for this information are Mr. Ken Rakestraw, Chief, Nater Accounts Branch, at the letterhead address, telephone: 915/534-6707; and Mr. Al Goff, Project Manager, U.S. Section, International Boundary and Water Commission, P.O. Box 5737, Yuma, Arizona 85364, telephone: 602/782-1598.

Please provide two copies of the Decision Record when it is available to me at the letterhead address. Also provide one copy of this document to Mr. Al Goff at the address given above.

Sincerely,

Conrad G. Keyes, Jr. Principal Engineer, Planning

cc: Mr. Beaumont C. McClure Deputy State Director Bureau of Land Henagement Arizone State Office Lands and Renewable Resources P.O. Box 16563 Phoenix, Arizona 85011

Colorado River Salinity Control Forum U.S. Bureau of Reclamation, Yuma

Dear Mr. Civish:

Thank you for your March 25, 1993, letter (Reference 8)51-041) inviting us to attend one of the several open houses the Safford District Office of the Sureau of Land Management (BLM) will hold beginning April 12, 1993. You propose to identify issues and concerns that will be addressed in a study to determine the suitability of eight rivers and streams in southeastern Arizona for inclusion in the Mational Wild and Scenic Rivers System.

Your letter listed the several rivers and streams located on public lands managed by the Safford District Office of the BLM. One of these rivers, the San Pedro, has its headwaters in Sonora, Mexico. The river crosses the international boundary into Arisona near Paleminas and flows northward to its confluence with the Gila River near Winkelman. About 1,120 square Rilomaters or 696 square miles of its drainage area are in Mexico and about 6,098 square kilomaters (3,789 square miles) are in Arizona.

The San Pedro River Basin is long and narrow, enclosed by many northward-trending mountain ranges and is characterized by many small tributaries. The river's flow is continuous where the streambed intercepts the water table or where it is spring-fed; elsewhere, it flows only in response to precipitation.

As the United States Section of the International Boundary and Water Commission, United States and Mexico (USIBNC), understands, the BLM took title in April, 1986, to a reach of the San Padro between the United States and Mexico international boundary and St. David, Arizona. The reach is about 58 kilometers (36 miles) long and about 5 kilometers (1 miles) wide and is designated the San Pedro Riparlan National Conservation Area (SPRNCA) by lagislative action. It is the reach of river within the SPRNCA that BLM is proposing for inclusion in the National Wild and Scenic Rivers System.

As you are aware, the USIBWC by virtue of the Treaty of February 3, 1944, for "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" (TS 994; 59 Stat. 1219), and

agreements concluded thereunder by the United States and Mexico, is responsible for ensuring that the United States Government meets the obligations incurred in those agreements. The USIBMC's statutory authority for carrying out those actions in the United States under these agreements rests in 22 U.S.C. 277 a-d. By this authority and other agreements, the USIBMC is interested in activities that could affect the hydrology, water quality, and ground-water resources of the several international streams located along the United States and Mexico international boundary.

Your proposal to include the San Pedro River in the National Wild and Scenic Rivers System appears to be consistent with our concerns for this international stream. We support your studies to formulate a recommendation to Congress for the inclusion of this stream into the system.

You also requested input regarding Cienega Creek near Sonoita, Arisona, to determine its eligibility and suitability for inclusion in the National Wild and Scenic Rivers System. Since this stream is distantly removed from the international boundary, flows north from headwaters northwest of Sonoita, and has its confluence with the Santa Cruz River downstream from Tucson, we can offer no relevant comments on Cienega Creek as it is out of the jurisdiction of the USISMC.

Thank you again for the invitation to the scheduled open-houses:

We may not be able to have a USIBMC representative at any of the
open houses due to travel restraints, but we do appreciate your
taking our comments into consideration. Please keep us informed
of the results of your proposed study to include these streams in
the National Wild and Scenic Rivers System.

O

sincerely,

Conrad G. Keyes, Jr. Principal Engineer



United States Department of the Interior

BUREAU OF MINES Intermountain Field Operations Center P.O. Box 25085 Buzidana 20, Derwer Federal Center Denver, Colorado 90225

June 20, 1994

Hemorandum

To:

Philip Moreland, Branch Chief, Flanning, Environment, Lands and Recreation, Arizona State Office, Bureau of Land Management, 3707 North 7th Street, P.O. Box 16563, Phoenix, AZ 85011

From:

Mark H. Hibpshman, Supervisory Physical Scientist

Subject: Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

We received a copy of the subject document which contains analyses for about 20 Arizona rivers for designation under the wild and scenic river system. A number of areas being considered contain important mineral resource values, and we appreciate your giving us the opportunity to comment. If, after reading the review, you have questions concerning our comments, please contact Jean A. Dupres at (303) 236-0451.

Mineral resource impacts are adequately addressed for most study areas under discussions for proposed actions and for all suitable alternatives. Such impacts are not adequately addressed for three areas proposed for management under the wild and scenic river system: San Francisco River, Gila River (Gila Box), and Middle Gila River. For these areas, additional mineral impacts that should be included in the final EIS are discussed below. For three other areas, we recommend against implementation of the proposed action because it would impede future development in older mining districts: Agua Fria River, Hassayampa River, and Santa Maria River. For several areas, mineral impacts are not adequately addressed under the all-suitable-alternative discussions; our comments regarding these areas also appear below. The all suitable alternative presents significant mineral resource impacts in many cases, and, for this reason, we urge BLM avoid this alternative for Agua Fria River, Big Sandy River, Bonita Creek, Burro Creek, Cienego Creek, Francis Creek, Gila River (Gila Box), Hassayaupa River, Middle Gila River, San Francisco River, and Santa Maria River.

Of all riparian areas recommended, the proposal to include the San Prancisco River in the wild and scenic rivers management system is the most perplexing. The U.S.G.S. 7.5 minute topographic map for the area shows that the river is as close as a mile to the Morenci operation tailings dams, which surely must be visible from the river. Morenci is not, as the document states, "one of the most significant copper mining districts in the United States" Response 39 - 1: The corrected information appears in the final document.

(Appendix, Volume II, "Gila Sox: Lower San Francisco River," p. 25, emphasis added), it is the largest copper wine in the United States and the second largest in the world. Alone, the wine supplies more than one fifth of U.S. copper production. It is impossible to so designate a river within a mile of a world-class mine without creating significant adverse impacts to future mineral resource development. First, the mine probably now has a visual impact on the San Francisco River. If the company expands its operation, having an adjacent river included in the wild and scenic rivers system (even if it is designated only as "recreational") is a definite adverse impact during the permitting process--questions invariably will be raised about worsening the present visual impact. Therefore, future expansion of the bine could be significantly curtailed. Furthermore, the suggestion that project planners wish to quantify instream flow strengly implies an intent to call into question water rights issues. In spite of the fact that any water rights secured would be junior to existing water rights (Appendix, Volume II, Gila Box: Lower San Francisco River, p. 3), such a statement is provocative to existing water users. A 1993, U.S. District Court order resulted in limiting pumping from a major aquifer in central Texas to preserve endangered species in local springs -- a legal decision that indicates that certain water uses can take precedence over established private ones. The operation presently utilizes water from wells in the drainage. Threat of curtailment of that water supply by rationing users to maintain a certain flow level introduces a significant impact. The document notes that the river is already Federally protected as part of the Gila Box Riparian Natural Conservation Area. Adding another level of protection for the river and to water use introduces significant impacts to mine expansion, impacts that should be brought to light and addressed in the mineral resource discussions (in both Affected Environment and Environmental Consequences sections). We strongly urge no action.

30-2

30-6

30-7

30-8

Recommendation of the Gila River (Gila Box) area poses a similar threat of water rights hattles because of BLM's announced intent to apply for a an instream water flow of 419 cubic feet per second and to quantify instream water rights. Potentially affected upstream users include Phelps Dodge's Kovenci operation along the San Francisco River. Again, the operation seems to be visible from parts of Segment 1 (designated "recreational" under the proposed action) and parts of Segment 2 (designated "scenic" under proposed action). Mine expansion would be compromised if it creates a visual impact on riparian areas designated as "scenic/ recreational" (proposed alternative) or as "wild/scenic" (all suitable alternative). The prohibition of additional power corridors probably impacts future expansion at Morenci and the anticipated development of the Sanchez, Dos Pobres, and Lone Star copper deposits. Such impacts deserve discussion in the bineral resource impacts analysis. We argue that existing protection of the area as part of the Gila Box Riparian National Conservation Area is adequate, and we recommend no action.

Regarding the Middle Gila River area, the riparian corridor passes through the Christmas Mine area, owned by Cyprus-Amax Minerals Co.

Response 30 - 2: A Congressional decision to designate the river is not expected to affect potential mine expansion for several reasons: the mine and potential area for expansion of operations near the portion of the San Francisco River under consideration in this document are primarily on private lands; nothing in the Wild and Scenic Rivers Act gives the federal government authority to regulate the activities on these lands.

Response 30 - 3: Please refer to general response # 5 (Instream Flow Water Rights). The lower 1/8 mile of the San Francisco River was granted a federal reserved water right in the Arizona Desert Wilderness Act of 1990 with a 1990 priority date; in compliance with the Act, the Bureau of Land Management will assert these rights in the upcoming state adjudication.

In the case of the remainder of the San Francisco River the Bureau has filed for an instream flow water right with the state of Arizona for wildlife purposes. This is in the application phase, is for 10 cfs, and has a priority date of 1985.

Response 30 - 4: Discussion of the water issue to which you refer is outside the scope of this document.

Response 30 - 5: Please refer to general response #7 (Multiple Designations).

Response 30 - 6: Please refer to general response #12 (Visual Impacts).

Response 30 - 7: Please refer to general response #12 (Visual Impacts).

Response 30 - 8: Please refer to general response #7 (Multiple Designations).

Quantifying instream water flow makes future mine development uncertain, and this impact on future water needs of the copper mine should be addressed. Even merely designating part of the river 30-10 "recreational" (proposed action) could frustrate development because of the mine's visual impact on the riparian area. Additionally, the document should note the proximity of the Hayden smelter, within a mile of the lowermost end of segment 1 of the proposed action and certainly visible from the lower part of segment 3 of the all suitable alternative. Mineral impacts discussions (for the proposed action and for the all suitable alternative) should note whether the smalter is visible from lover river segments. If it is, the document should discuss impacts to future smelter expansion because of its visual impacts on the river. We recommend the no action alternative because of the routing of the segment through the Christmas Mine area.

Similarly, an adverse impact on future mineral development is realistically predictable for Cienega Creek under the all suitable alternative. Asarco has a yet undeveloped property at Helvetia on the east side of the Santa Rita Mountains. If parts of Clanega Greek are designated as scenic, permitting of the mine vill be significantly impacted because of its visual impact on the riparian corridor. We again recommend no action, which is the proposed alternative in this case. The threat to future development of this copper property as a function of its visual impact on Cienega Creek should be addressed in "Affected Environment" and in "Environmental Consequences" sections in the all suitable alternative analysis.

Bonita Creek is mituated midway between Morenci and several undeveloped copper properties. One of these properties, Sanchez, is in the final stages of permitting prior to development. The other two, Lone Star and Dos Pobres, are currently being evaluated by Phelps Dodge for future development. The all suitable alternative could have significant impacts for future development of all the above properties from the standpoint of visual impacts and water rights issues. Discussion of potential mineral resource 30-12 impacts should be included in "Affected Environment" and "Environmental Consequences" sections where the all suitable alternative is analyzed.

> Regarding the Santa Maria River, it is our understanding that Cyprus Bagdad and the Arizona Department of Highways operate sand and gravel borrow pits in Segment B for road surfacing material.
> Continued use of such pits would be impossible under the all suitable alternative (which proposes Segment B as wild) -- a significant mineral resource impact. Commentary on this impact should appear both in "Affected Environment" and "Environmental Consequences" section where the all suitable alternative is discussed.

jad/cvl

Response 30 - 9: Please refer to general responses # 4 (Federal and State Water Rights), and # 12 (Visual Impacts). There would be no adverse impacts from possible water rights or visual management on the potential development of the mining properties.

Response 30 - 10: Please refer to general response # 12 (Visual Impacts).

Response 30 - 11: Please refer to general response # 12 (Visual Impacts),

Response 30 - 12: Valid existing mineral claims would not be abrogated and existing mining activity would be allowed under wild and scenic river designation (Bureau of Land Management manual section 8351.51A1d, 1992).



000044 United States Department of the Interior

NATIONAL FARK SERVICE
Western Region

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600 Harrison Street, Suite 600 San Francisco, Cabitornia 94107-1572

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JUL 1 1994

Phillip Moreland, Brench Chief Planning, Environment, Lands and Recreation (931) Arisona State Office, Bureau of Land Management 3707 Worth 7th St. P.O. Box 16551 Phoenin, AI 85011

Dear Mr. Moreland:

This letter is in response to your request for comments on the Braft Arizons Statewids Wild and Scanic Rivers Legislation Environmental Impact Statement (LETS) (DES-94/0015). The National Park Service has the following comments on the LETS.

GENERAL COMMENTS

We commend the Bureau of Land Management, Arizons State Office (ALM) for carrying out an ambitious and time-consuming Wild and Joenic River eligibility and mutability study process. It is clear that BLM manages many outstanding river resources in Arizons. We are pleased that the proposed sitemative recommends partions of 13 rivers for designation, and we appreciate the opportunity to provide comments on the LEIS.

SPECIFIC COMCERTS

The comments below are based on information in the suitability assessments of Saptember, 1993, as well as in the LETS, as little information on the rationales for switchlitty/non-suitability was contained in the LETS.

- Virgin River: ALM makes a strong case for designation of this river, based on its outstanding resources and BLM's ability to manage and protect the river (Virgin River Suitability Assessment p. 17. Manageability of River Area by RLM). Mewartheless, BLM proposes study status for this section as well as the river as a whole. Secures of the quality of the reasources and the significant threats to the river as a whole, we urge BLM to recommend immediate designation for the Arizons section, combined with study of the Utah and Newada sections, rather than defer designation of the Arizons section until completion of a three-state study. Lake Mead National Recreation Area, where the Virgin River Flows into Lake Head, will hemself from the protection of river resources that Wild and Semied designation can provide.

- Cleases Great: No understand that there is notable difference of opinion as to the significance of this river, which BLK has found to be non-subtale for designation and not deserving of national recognition. No recommend that BLM recomming the significance of this river, which is identified as "one of the last places in Arisons supporting native flah populations uncontaminated by eachtic or non-heive flah" (Clamesa Creek Suitability Assausent, p. 5). It is minimed by the Arisons Bivers Coalition to be one of the last and best remaining clenges-type rivers in the southwest, and it is rated "Outstanding for its ulfalife, fish, riparian regetation, and stream bydrology resources in

Response 44 - 1: Please refer to general response # 1 (Alternatives).

Response 44 - 2: Please refer to general response # 8 (Cienega recommended alternative).

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44-2

the Arizona Rivers Assessment, which this office undertook in paramership with Arisons State Parks. BLK cites no management impediments to designation of

While Cleange Creek is currently managed as an Area of Critical Environmental Concern (MCMC), the area appears to be worthy of the higher level of protection afforded by the Mild and Scenic Elvers Art. As ELA recognises in the Virgin River suitability Assessment and Others, ACCC's are "internal," Edministrative designations, and management restrictions are not as binding as Congressional designations: {virgin River outsability assessment, Supramber, 1991, p.77). Wild and Scenic suitability is not procluded by wilderness or ACEC designations, and can provide a significantly higher level of protection.

- Ensteyange Elver: Bid has found this river to be unsuitable for designation based on the argument that it is "unmanageable se a whole" (Rassayange River Buitability Assemment, p.2). However, a significant portion of the river lies withis the Hassayange River Canyon Wildermans Area, and is sireudy managed much the way a Wild and Sensin River would be, Furthermore, MIM resumments disconnected sections of a number of other rivers (e.g. Burro Creek) for designation.

SLM argums in the Enssayampa River Switshillty Assessment that there are "no MIN argume in the Exampança Hiver Enjightlifty Assessment that there are "mo threats of development or other actions that could only be prevented through a SMSEM demignation" (p.2). However, as noted in the LHIS, the Eureau of SMSEM demignation" (p.2). However, as noted in the LHIS, the Eureau of SMSEM demignation a four a dam in the Eure Canyon area. While the ADM scene mat have any surrent plans for a dam at this site, the existence of this withdraweal wedericores the added protection that can be provided to this rivar by Wild and Scanis designation.

We recommend designation of a reach, which is manageable and which includes the Reservance River Cappon eres, to permanently protect this river resource. While and Scenic designation would complement the protection provided by the existing Manageans River Canyon Wilderness Area.

Oue to the reasons given above, we urgs RIM to recommend immediate Wild and forming designation for the krisons section of the Virgin River, combined with a study of the Vtah and Nevade sections. We also recommend that HIM rescanding the significance of the Clanega Cruek, which WiM has found to be non-switchable for Sesignation and sot descerving of national recognition, as a Wild and Scenic swittbility is not precluded by wilderness or ACEC designation and som provide a significantly highes they of prevention. Finally, we recommend designation of a reach for the Massayampa Biver, which is manageable and includes the Hassayampa River Canyon area. and includes the Bassayampa River Canyon area.

Should you have any questions, please centact Martha Crusius, OstAcor Macrostian Pianesr, at (415) 744-3875, or Usa Olmon, Regional Environmental Coordinator, at (415) 744-3986.

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Thank you for the opportunity to provide these comments.

Stanley T. Albright, Ampional Director, Western Magico

Outricia / newbacher

Response 44 - 3: Please refer to general response # 11 (Suitability Determinations).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

JUC 0 7 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Bureau of Land Management 3707 North 7th St. P.O. Box 16563 Phoenix, AZ 85011

Dear Mr. Moreland:

The U.S. Environmental Protection Agency (SPA) has reviewed the Draft Arisons Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (DEIS). Our comments on this DEIS are provided pursuant to the National Environmental Policy Act (NSPA) [42 USC 4231 et seq.], Council on Environmental Quality (CEQ) regulations [40 CFR Farts 1500-1508] and Section 309 of the Clean Air Act.

The DEIS examines the inclusion of additional Arizona rivers into the Mational Wild and Scenic Rivers System (Wild Rivers System). The DEIS assesses 4 alternatives for future management of river areas in Arizona and analyzes the environmental consequences of the alternatives. The proposal, or preferred alternative, recommends that 13 specific river areas be designated as part of the Wild Rivers System.

We have rated this DEIS as "LO" -- Lack of Objections. We recommend, however, that the DEIS address a few additional issues. The DEIS should examine the possible sources of air pollution which may create visibility problems in the river areas. The Final EIS (FEIS) should discuss whether these river areas will be designated as Prevention of Significant Daterioration, Class I areas under the Clean Air Act [42 U.S.C. 57491].

The PEIS should assess the impacts on water quality of the proposed river areas from activities potentially causing direct discharges and polluted runoff. Direct sources of water pollution are regulated under the perait system established by the Clean Water Act - the National Pollution Discharge Elimination System (NPDES) [33 U.S.C. §1342]. We recommend that you contact Wayne Palsma at the Arizona Department of Environmental Quality (ADEQ) to determine what NPDES permits have been granted or are pending which may affect the river areas under consideration for designation. Mr. Palsma can be reached at the Surface Water Section, ADEQ, 3031 N. Central Ave.,

Response 79 - 1: Visibility is not a consideration in the determination of eligibility or suitability under the Wild and Scenic Rivers Act. Possible causes of pollution affecting visibility would be considered in the development of river management plans after Congressional designation.

Response 79 - 2: Water quality monitoring is not a consideration in the determination of eligibility or suitability under the Wild and Scenic Rivers Act. Maintenance and enhancement of water quality would be considered in the development of river management plans after Congressional designation.

27,

We appreciate the opportunity to review this DEIS. Please send one copy of the FEIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact me at (415) 744-1574 or Edward Yates, of my staff, at (415) 744-1571.

Sincerely,

Hanne Hallbracks
(bavid Farrel, Chief
the Environmental Review Section
Office of Federal Activities

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DEPARTMENT OF THE ARMY
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July 11, 1994

Office of the Chief
Environmental Resources Branch

Mr. Phillip Moreland, Branch Chief Planning, environment, Lands and Recreation (931) Arizona State Office Burcau of Land Management 3707 North 7* Street P. O. Box 16563 Phoenix, Arizona 85011

Dear Mr. Moreland:

The Los Angeles District, Corps of Engineers (Corps), has reviewed the draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement, dated April 1994 and received in our office on June 29, 1994. Our comments are enclosed.

We appreciate the opportunity to review the draft document and look forward to receiving the final document, when completed. If you have any questions, please contact Mr. Ronald MacDonald, Senior Ecologist, at (213) 894-3661.

Sincerely,

Robert S. Jda

Chief, Planning Division

Enclosure

U. S. ARMY CORPS OF ENGINEERS COMMENTS ON DRAFT ARIZONA STATEWIDE WILD AND SCENIC RIVERS LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT DATED APRIL 1994

General Comments. -

116-1

1. The Environmental Impact Statement (EIS) should include the following statement: "As part of the Alamo Lake, Bill Williams River, Mohave and La Paz Counties, Arizona project, all lands required for the project up to the spillway crest elevation of 1,235 feet and lands along the river downstream for approximately one mile have been withdrawn from the Public Domain and management authority rests with the U. S. Army Corps of Engineers (Corps), as directed by the Congress. Management authority for fish and wildlift purposes on all project lands has been delegated to the Arizona Game and Fish Department. Recreation facilities at the lower portion of the lake are operated and maintained by the Arizona State Parks Department. Ali operation, maintenance, and replacement activities are conducted in accordance with the approved Corps Master Plan. The only management activities retained by the Bureau of Land Management (BLM) within this area are (1) Burro control, (2) Grazing leases, and (3) mineral rights. Items (2) and (3), above, are subject to the Corps surface land management authority, direction, and authorization."

116-2

276

2. The boundaries for the Francis Creek, Big Sandy River, Burro Creek, and Santa Maria River Wild and Scenic River Study Areas upstream from Alamo Lake, and the Bill Williams River Wild and Scenic River Study Area downstream of Alamo Dam <u>must</u> be revised to delete any lands withdrawn for the Alamo Lake project, as these lands are managed by the Corps and are not subject to designation under the Wild and Scenic River System by the BLM.

116-3

- 3. The text of the EIS as well as the individual assessments in the River Appendix Volumes 1 and 2 should be revised to indicate that designation of the river segments noted in General Comment #2, above, do not include any lands withdrawn for the Alamo Lake project and that operation of Alamo Lake will not affect any of the Wild and Scenic River Study Areas.
- 4. The text of the EIS and Appendixes should be revised to delete any reference to instream flow studies to be conducted on the Bill Williams River. Any reference to the Bill Williams River should include a discussion of the Bill Williams River Corridor Technical Committee (BWRCTC), of which the BLM is a member. The BWRCTC has studied issues pertaining to the Bill Williams River and the operation of Alamo Dam and has developed a plan for operation and regulation of Alamo Dam. Corps studies are underway to revise the

Response 116 - 1: The final document includes appropriate portions of the suggested statement.

Response 116 - 2: None of the action alternative maps for the Francis Creek, Big Sandy River, Burro Creek, or Santa Maria River study areas include lands withdrawn for the Alamo Lake project under Public Land Order 492 dated April 28, 1948. Withdrawn lands are not an issue in the no action alternative.

Response 116 - 3: The final appendix documents for the Big Sandy, Bilt Williams, and Santa Maria rivers include appropriate clarifications regarding agency management responsibilities for the Alamo Lake area.

Em O

Reservoir Regulation Manual for Alamo Dam to include the recommended plan of operation worked out by the BWRCTC.

116-4

5. The proposals for the river segments noted in General Comment #2, above, have not been coordinated with the Corps. The Corps cannot support any recommendations on these segments. Further coordination with the Corps is required before these segments can be proposed as part of the Wild and Scenic River System.

SPECIFIC COMMENTS ON THE EIS. -

- Page 12, Big Sandy River. Delete reference to "Potential raising of Alamo Dam..." A study is currently underway to assess potential safety aspects of Alamo Dam. One alternative under study is to raise the elevation of the Dam; however, the raising of the dam would be for safety purposes and would not affect the spillway design flood pool.
- 116-5
- Page 12, Big Sandy River. Delete reference to "free-flowing values" since no proof has been provided to support that statement.
- 3. Fage 14, Santa Maria. Delete reference to "Potential raising of Alamo Dam..." A study is currently underway to assess potential safety aspects of Alamo Dam. One alternative under study is to raise the elevation of the Dam; however, the raising of the dam would be for safety purposes and would not affect the spillway design flood pool.
- Page 14, Santa Maria. Delete reference to "free-flowing values" since no proof has been provided to support that statement.
- Page 18, Table 1-2. Delete the acreage withdrawn for the Alamo Lake project from the areas listed for the Yuma, Kingman, and Phoenix Resource Areas.
- Page 19, Table 1-3. Delete the area withdrawn for the Alamo Lake project from the percentage of BLM land listed for the Yuma, Kingman, and Phoenix Resource Areas.
- Page 23, Issues Considered. Add that the Corps has the right to flood all lands withdrawn for the Alamo Lake project and to control downstream flows in accordance with the Alamo Lake Reservoir Regulation Manual.
- Page 27, Table 2-PA1. Delete the miles/acreage withdrawn for the Alamo Lake project from the areas listed for the Bill Williams, Big Sandy, and Santa Maria Rivers.

Response 116 - 4: Please be aware that the eligibility determinations for Francis Creek, Burro Creek, the Big Sandy River, Santa Maria River and portions of the Bill Williams River were made in the Kingman Resource Management Plan. A Notice of Intent announcing the preparation of the plan and requesting information about issues was published in the Federal Register September 27% 1988. A well publicized and extensive effort at public involvement was conducted during the three-year development of the plan. In addition. as stated in the plan, "[o]n March 28, 1990, there was a meeting with representatives from the Corus of Engineers to discuss Alamo Lake (page 234, Final Kingman Resource Management Plan)." Also, the Corp of Engineers was listed among the agencies to which copies of the draft and final resource management plans were sent (page 235, Final Kingman Resource Management Plan).

A Notice of Intent announcing the preparation of the wild and scenic rivers legislative environmental impact statement and requesting information about issues was published in the Federal Register February 19, 1993. Information in the Consultation and Coordination chapter of each document provides details about the letters, public scoping meetings,

- Page 28, Management Actions. A statement should be included that Management Actions by the BLM will not be undertaken on lands withdrawn for the Alamo Lake project.
- Page 29, Management Actions. It should be noted that new road development wiil not be prohibited on lands withdrawn for the Alamo Lake project.
- 11. Page 29, Management Actions. It should be noted that campground development will be in accordance with the approved Master Plan for Alamo Lake on lands withdrawn for the Alamo Lake project.
- 12. Page 29, Management Actions. It should be noted that, as with campground development, recreation activities and limits will be in accordance with the approved Master Plan for Alamo Lake on lands withdrawn for the Alamo Lake project.
- 13. Page 29, Management Actions. It should be noted that plans for willow planting on lands withdrawn for the Alamo Lake project will be developed in coordination between the Corps and the Arizona Game and Fish Department.
- 14. Page 30, Management Actions. It should be noted that, on lands withdrawn for the Alamo Lake project, no additional grazing will be permitted. Delete any reference to Corps areas.
- 15. Page 61, Table 4-PA1. Delete the acreage withdrawn for the Alamo Lake project from the areas listed for the Bill Williams, Big Sandy, and Santa Maria Rivers.
- 16. Page 62, paragraph 2. Delete this entire paragraph. Congressional designation and BLM management of possible Wild and Scenic River segments will not include lands withdrawn for the Alamo Lake project. Alamo Lake is operated for purposes authorized by The Congress, and operation is based on protecting lands downstream on the Bill Williams River and the Colorado River downstream into Mexico.

116-6

17. Page 115, Other Agency Consultation and Coordination. We note that there has been no coordination with the Corps. Had coordination been conducted with the Corps, many of the above comments may not have been necessary. Proper coordination is an essential part of preparation of a NEPA document, and for this reason, the Corps finds the draft EIS deficient and should be revised in accordance with the above comments and recirculated as a draft document.

and other efforts taken by the Bureau of Land Management to involve other agencies and and the public. The Corps of Engineers was among the agencies to whom copies of the draft document were sent for review and comment (page 125, draft statewide document).

Response 116 - 5: The Kingman Resource Management Plan determined these segments of the Big Sandy and Santa Maria rivers to be free-flowing and eligible for consideration as wild and scenic rivers (see general response # 11 (Suitability Determinations).

Response 116 - 6: See response 116-4.

116-7

River Appendix Volume 1, Big Sandy Wild and Scenic River Study Area. page 24. The boundaries for the Francis Creek, Big Sandy River, Burro Creek, and Santa Maria River Wild and Scenic River Study Areas upstream from Alamo Lake, and the Bill Williams River Wild and Scenic River Study Area downstream of Alamo Dam must be revised to delete any lands withdrawn for the Alamo Lake project, as these lands are managed by the Corps and are not subject to designation under the Wild and Scenic River System by the BLM. The text of the individual assessments in the River Appendix Volumes should be revised to indicate that designation of these river segments do not include any lands withdrawn for the Alamo Lake project and that operation of Alamo Lake will not affect any of the Wild and Scenic River Study Areas.

SPECIFIC COMMENTS ON THE APPENDIX. -

116-8

116-9

- River Appendix Volume J. Bill Williams Wild and Scenic River Study Area, pace 1. Change 37 miles to 39 miles; change 4,730 square miles to 4,770
- River Appendix Volume 1, Bill Williams Wild and Scenic River Study Area, page 6. The prohibition on construction of various facilities along the 17.4 riparian miles of Bureau of Land Management land does not include the approximately one river mile downstream of the dam that has been withdrawn for the Alamo Lake project and would not ban repair or replacement in kind of the existing stream gage immediately down-stream from Alamo Dam.

River Appendix Volume 1, Bill Williams Wild and Scenic River Study Area, page 15. Alamo Dam construction was completed in 1968, not 1969; the sentence should be re-written to say "Alamo Dam began to regulate flows in 1969." The maximum flow below Alamo Dam in 1980 was approximately 3,900 cfs, not 888 cfs.

River Appendix Volume 2, Santa Maria Wild and Scenic River Study Area, page 3. What is meant by There is a U.S. Army Corps of Engineers withdrawal of floodwaters of the Alamo Dam"? The Corps controls flood runoff in the Bill Williams River drainage area above Alamo Dam through operation of the dam.

116-10

6. River Appendix Volume 2, Santa Maria Wild and Scenic River Study Area, page 17. The boundaries for the Francis Creek, Big Sandy River, Burro Creek, and Santa Maria River Wild and Scenic River Study Areas upstream from Alamo Lake, and the Bill Williams River Wild and Scenic River Study Area downstream of Alamo Dam must be revised to delete any lands withdrawn for the Alamo Lake project, as these lands are managed by the Corps and are not subject to designation under the Wild and Scenic River System by the BLM. The text of the individual assessments in the River Appendix Volumes should be revised to indicate that designation of these river segments do not include any lands withdrawn for the Alamo Lake project and that operation of Alamo Lake will not affect any of the Wild and Scenic River Study Areas.

Response 116 - 7: No lands are included under Public Land Order 492 for the Alamo Dam project under the action alternatives for the Francis Creek, Burro Creek, and Big Sandy River study areas

Response 116 - 8: The final document contains the appropriate corrections.

Response 116 - 9: The final document contains the appropriate corrections.

Response 116 - 10: The final document contains the appropriate corrections.

Bureau of Land Management, 1994

Letters from state agencies



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MENORANDUM

Bureau of Land Management, DOI

ARIZONA STATE CLEARINGHOUSE

DATE July 7, 1994

RE

DRAFT Arizona Statewide Wild and Scenic Rivers Legislative EIS

SAI NO: AZ 940401-80-0024

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Ragional Councils of Government.

The project is supported as written. Any comments, received within the 60 day comment period, will be directed to the federal agency with a copy to the applicant.

Manager Arizona State Clearinghouse

cc: Arizona State Clearinghouse Applicant

3800 North Central Avenue, Saite 1300, Phoenie, Araona 85012, (602) 280-1300, (002) 280-1301, Fax: (602) 280-1305

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GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000

Derector Deares L. Sarquis

Deput Durker

July 8, 1994

Mr. Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizons State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizons 85011

Ra: Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

Dear Mr. Moreland:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced Draft Legislative Environmental Impact Statement (EIS), dated April 1994, and the following comments are provided.

GENERAL COMMENTS

115-1

In addition to the rivers specifically mentioned below, these general comments would apply to all other reaches being considered for designation. For rivers already within a designation wilderness, the Department notes that strict coordination between functions of an existing Wilderness Hanagament Plan and the Managament Plan to be developed under the Wild and Scenic Rivers Act (Act) will be a critical issue. The Department recommends that the guidance provided by the International Association of Fish and Wildlife Agencies (attached) with regard to the development of Wilderness Managament Plans be closely reviewed when developing overlapping Management Plans. The Department notes that this overlap in land management requirements should not hinder the efficient management of wildlife resources by State or Paderal wildlife agencies.

BIG SANDY RIVER

115-2

Fage 1. General Description of Study Area. Clarification is needed regarding the location of the terminus of the study area at Alamo Lake. No portion of the Alamo Wildlife Area should be included in the study area.

As Equal Opportunity Agency

Response 115 - 1: Management plans developed for all rivers designated by Congress will be developed in compliance with the requirements of the National Environmental Policy Act which provide interagency consultation and public review and comment. Recommendations by state and federal agencies would be encouraged.

Response 115 - 2: The southern terminus of the Big Sandy River study area is in T12N, R12W, section 18, SW1/4. None of the action alternatives for the study area include lands withdrawn under Public Land Order 492 for Alamo Dam and Alamo Lake, where wildlife management by the Arizona Game and Fish Department is authorized under a cooperative agreement between the Department and the U.S. Army Corps of Engineers.

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Page 2. The Eureau of Land Management. If the Big Sandy-Santa Maria-Bill Williams-Alamo Lake area is referred to as a "complex", the Department recommends noting that this area is not under a single jurisdiction. In addition, a more accurate description of the administrative situation might be the Big Sandy-Santa Maria-Bill Williams-Alamo Wildlife Area complex.

Pege 1. Department of the Interior Agencies. Please note that the Arizona Game and Fish Department became the lead agency in the Bald Eggle Neat Watch Program in 1991.

Page 3. State. The Department recommends that the mention of Alamo Lake State Park be expended to reflect that lands within the Alamo wildlife Area are under the primary management authority of the Department. This muthority is provided by the Fish and wildlife Coordination Act of 1934; Public Land Order 492; the General Plan agreement between the Secretary of the Army, Secretary of the Interior, and the Director of the Arizona Game and Fish Department signed by Stewart Odall on January 19, 1968; and license agreement DACWO9-3-71-6 between the U.S. Army Corps of Engineers and the Arizona Game and Fish Department.

Page 23. Impacts on Outstandingly Remarkable Fish and Wildlife Values. The Department notes that restrictions based on the presence of bald eagle nexts must be coordinated with our agency and the U.S. Fish and Wildlife Service (Service).

BILL WILLIAMS RIVER

Page 2. Bureau of Land Management. It is the Department's belief that the Alamo Wildlife Area extends to a point approximately 1.5 miles downstream from Alamo Dam. This would appear to overlap with the stated boundaries of the Bureau of Land Management's (Bureau) Sill Williams Riparian Management Area (BURMA). The Department recommends modifying the stated boundaries of the BURMA to reflect that no portion of the Alamo Wildlife Area is under primary jurisdiction of the Bureau.

Page 3. State. Because the Alamo Wildlife Area extends approximately 1.5 miles downstream from the dam, this area is administered by the U.S. Army Corps of Engineers (Corps) and the Department.

Fage 7. Ongoing management actions. With regard to the proposed restrictions on helicopter flights, the Department does not believe the Bureau has jurisdiction over the restriction of airspace. We recommend that proposed developments up to one mile from the subject masts be jointly evaluated by the Department, the Service, and the Bureau regarding the possible need for additional restrictions.

Response 115 - 3: The final document includes appropriate clarifications regarding agency management responsibilities for the Alamo Lake area.

Response 115 - 4: The final document contains the corrected information.

Response 115 - 5: See response 115-3.

Response 115 - 6: The final document contains the corrected information.

Response 115 - 7: This ongoing management action is derived from the Kingman Resource Area final Resource Management Plan.

284

115-5

115-6

115-7

Page 9. Outpoing management actions. In addition to limits of vegetation utilization, the Department recommends that other factors be monitored when evaluating livestock and burro impacts, such as effects on bank stability.

SANTA MARIA RIVER

115-8

Page 1. General bescription of Study Area. The Department recommends that the study area be more clearly defined. The narrative lists the study area as beginning in Section 1 of Range 5 West. However, the map shows it in Ranga & West. Clarification is also needed regarding the terminus of the study area at Alamo Lake.

115-9

Page 2. Bureau of Land Management. A description of the boundaries of the Santa Maria Area of Critical Environmental Concern (ACEC) is needed. Tha confluence of the Big Sandy and Santa Maria Rivers is apparently within the ACEC, and the Department suggests that our agency's jurisdiction over this area be clarified in the Final EIS. The Department recommends developing Allotment Management Plans (AMP) for the three grazing allotments in segment A for which no AMP's currently exist. The Department believes these AMP's are needed and that their development would facilitate implementation of the Wild and Seenic Rivers and grazing on page 8. In addition, the determination of current grazing levels in the context of the Wild and Scenic Rivers Act could be accomplished by such AMP development.

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115-10

It is stated that "wild burros are managed in accordance with the Wild Horse and Burro Act and the Alamo Interim Herd Management Area Plan." Those portions of the Santa Maria River located within the Alamo Wildlife Area are under the Department's jurisdiction and do not meet the criteria set forth in the Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) which would allow them to be administered for the management and protection of wild horses and burros under the provisions of that Act (Sec. 2(e)).

115-11

Page 3. State of Arisons. The Department recommends that, in addition to the acknowledgement of the Department's statewide responsibility for the management of wildlife populations, the Final EIS should mention that lands within the Alamo Wildlife Area are under the primary management authority of the Department, as previously stated in our comments on the Big Sandy River section (Page 3. State).

Page 3. Issues Considered but not Discussed Further. The Department recommends changing "any future management restrictions would apply only to public lands" to specify "...public land managed by the Eureau of Land Management."

Response 115 - 8: The eastern terminus of the Santa Maria River study area is at the intersection of T13/14N, R7/8W. The western terminus is at the R11/12W line in T11N, Section 18.

Response 115 - 9: Suggestions regarding the development of allotment management plans are beyond the scope of this document.

Response 115 - 10: The geographic area is not within the study area boundary. Since the material on the Alamo Interim Herd Management Area Plan was not essential to the discussion it has been deleted in the final document.

Response 115 - 11: Agency management responsibilities for the Alamo Lake area have been revised and clarified in Section I.C.

Mr, Phillip Moreland July 8, 1994

Page 4. Impact on recreation. The Department believes that the estimate of visitor use of "less than 1000 days annually" is too low, and we recommend recalculating this figure. Off-highway vahicle travel alone would see

Page 6. Ongoing management actions. Please refer to our comments above regarding page 7 of the Bill Williams River section.

115-13 Page 16. Wildlife. The Department recommends noting that nesting persegrine falcone have been documented as occurring in the nearby Arrastra Mountain Wilderness.

Page 20. Impacts on Outstandingly Remarkable Fish and Fildlifs Values. In the paragraph discussing the Corps and Alamo Lake, the Department believes that the Alamo Wildlife Area should be mentioned.

Thank you for the opportunity to review and comment on this Draft EIS. If you have any questions, please contact me at 789-3602.

Sincerely,

James E. Burton, Chief Mabitat Branch

JEB:GSS:ss

cc: Regional Supervisors Sam Spiller, State Supervisor, Az. ES State Office, USFWS

Enclosure

AGFD# 3-24-94(01)

Response 115 - 12: The 1,000 figure is an estimate based on field observation.

Response 115 - 13: The final document contains the corrected information.

IN NATIONAL PORTAL THE SERVICE OF LYME NAMEDICAL ATTRIBUTES?

Parsore

This statement of policy and the following guidelines are intended in provide guidence to State and Federal personnel for the imagement of fish and wildlife in widerness in demoratance with the Wildlife act of 1966 (16 USC 1131-1136). Both State and Federal agencies are responsible for footstring annual understanding and cooperation in the management of fish and wildlife in wideress. These guideliness should serve as a framework for cooperation among the Forest Service. Suresu of Land Nanegement, and the Scates in the coordination of fish and wildlife management and in the development of cooperative agreements or other management plans.

These policies and guidelines were developed within the overall context of the purpose and direction of the Wilderness Act, and they should be made available to all agencies responsible for management of the Marianal Wilderness Preservation System. to appropriate State fish and wildlife agencies, and to other interested percies.

General Policy

Fish and wildlife management activities in wilderness will be planned and carried out in conformance with the Filderness Act's purpose of sequence and "enduring resource of wilderness" for the American people. The wilderness resource is defined in section I(c) of the Act, as an area assentially "untranneled by man", where natural ecological processes operate freely and the area is "affected primerity by the forces of nature." The National Wilderness Preservation System will be managed to ensure that acclogical suncession, including fire and infestation of insects, operate as freely as possible with only minimum influence by humans.

Fish and wildlife management activities will emphasize the protection of natural processes. Management scrivities will be guided by the principle of daing only the minimum decessory to manage the area as wilderness.

Section 4(4)(7) of the Wilderness Act stipulates that "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." Angling, bushing, and trapping are legitimate wilderness activities, subject to applicable State and federal laws and regulations.

This nation is fortunate in having a National Wilderness Prayervation System anchopsessing a wide range of ecosystems. Specific on-the-ground conditions will result in slightly different application of these guidelibes in sever a system. These different applications are spelled out in National Fortst Plans or wilderness sanagement plans. This is both appropriate and proper, if we are to allow secure to play the dominant role.

Appendix 1-1

1. Use of Motor and Equipment

Section 4(c) of the Wilderness Acc states:

Expens as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness eras designated by this Act and, attempt as necessary to meet minimum requirements for the administration of the seafor the purpose of this Act (including measures required to emergencies involving the health and safety of persons within the area), there shall be no temperary road, no use of noter vehicles, eccrited equipment or exceptors, no landing of sirerait, no extent form of mechanical transport, and to structure or installation within any such area.

The suphasis is on the management of the area as vilderness as opposed to the management of a particular resource. This language is viewed as direction that all management activities within wilderness be done without motor vehicles, motorized squipment, or mechanical transport, unless truly necessary to administer the area or are specifically permitted by other provisions the Act. It makes that any such use should be tare and temporary; that normals can be built; and that wilderness managers must determine such use is the minimum necessary to accomplish the cask. Any use of motorized equipment or mechanical transport requires advance approval by the administering agency.

Z. Fish and Wildlife Research and Management Surveys

Research on fish and wildlife, their habicses and the recreational users of these resources is a legitimate activity in wilderness when conduced "in a sensor compacible with the preservation of the wilderness environment" (Sec. 4(d)(t) of the Wilderness Act). Methods that temporarily infringe on the wilderness environment may be approved if alternative methods or other locations are not available. Research or menagetment surveys must be approved in writing, on a case-by-case basis, by the administrating agency.

Helicopters and fixed-wing aircraft overflights may be used to conduct approved fish and wildlife research activities. Aircraft must be used in a manner that airlighes discurbance of other users, including humans and wildlife.

All fish and Wildlife studies within and over Wildermess must be conducted so as to preserve the natural character of the Wildermess. Astul counts and observations of wildlife may be permissible for management of wilammess wildlife resources. Capturing and marking of animals, radio teleastry, and decasional responsity installations (such as sentences for cameras and scientific apparatus and emclosures and exclosures essectial for wildlife research or management surveys) may be permitted, if they are assential to guide that charge conditions be accomplished alsowhere.

<u>Gaidalicas</u>

- Obtain specific written approval or paraits from the administrating agency before erecting any structure, enclosure, or exclusive.
- Locate and construct all structures so as to make them unobtrusive on the landscape.
- c. Construct seructures of agrive metariels or campuflage to make them blend with their natural surroundings.
- d. Flan aircraft flights over wilderness to minimize disturbance. Consider time of day, season of the year, route and alkitude of flight, and location of landing areas on the perimeter of the wilderness.
- a. Research projects underway when a wilderman is designated may continue, but modify research methods to minimize disturbance of the wilderman environment.
- Installation of permanent base stations within wilderness is not permitted for monitoring of radio-instrumented swinels.
- g. The administering agency should only approve capture methods that minimize the impact on the wilderness environment.

J. Facility Development and Rabitat Alteration

In case instances, facility development and habites atterpation may be necessary to alleviate adverse impacts caused by bunan activities on fixh and wildlife. For the banefit of wildlife that spend only part of the year in wilderness, give first priority to locating facilities or habites alcerations outside wilderness.

Flow-maintenance dams, water developments, water diversion devices, ditches and associated attuctures, and other fish and wildlife habites developments necessary for fish and wildlife management (which were in existence before wilderess designation) may be permitted to remain in operation.

Clearing of debris that impedes the migratory movements of fish on primary spawning streams may be parmitted, but only in a manner compacible with the willestness resource.

Maintenance of existing vaces supplies and development of additional vaces supplies may be permitted, but only when estential to preserve the wilderness resource and so operates to make the conditions resulting from human indicators.

Guidelines

 Submit proposals for new structures or habitet alterations to the administering agency for approval.

- b. Suild or maintain new and existing structures permitted for whichtife management in a manuar that micinizes the visual impacts on the landscape.
- c. Limit elemming of debris from sparwing streams to those identified in the wilderness management plan as being critical to the propagation of film.
- d. Use only commocorized squipment to clear debris. Use explosives only when the use of band tools is not practical, and only outside of beary fision-use periods.
- The administering agency and the State agency will jointly make decisions to remove existing water related improvements.
- If it is canassary to testore essential food plants after human disturbance, use only indigenous plant species.

4. Threatened and Endangered Species

Many wilderness areas provide important habitat for Federally listed threatened and and angered species of wildlife. Actions necessary to protect or factors threatened or entangered species, including habitat manipulation and species protection measures, say be implemented in vilderness. For such actions must be decessary for the perpetuation or recovery of the species and it observes the demonstrated that the actions cannot be done more effectively outside vilderness. Use only the minimum actions necessary and the network sort appropriate in wilderness.

Guidalines

- a. Manage wildernass to protect known populations of Federally listed thresteed or endangered species where measury for their perpetuation and to sid in their recovery in previously occupied bebicar.
- b. When alternative areas outside of wilderness offer equal or better opportunities for habitat improvement or species arreaction, take actions to recover threatened or andappered species outside of wilderness first.
- c. Threatened and endangered species may be transplanted into praviously occupied habitat within wilderness.
- d. All transplants on habitat improvement projects require approval by the administering agency.
- e. To prevent Federal listing, protect Indigenous species that could become chreatened or endangered or are listed as threatened or endangered by Sacces.

5. Magling, Bonding and Travolng

Angling, buncing and crapping are legitimate wilderness activities subject to applicable State and Federal Laws and regulations.

6. Population Samoling

Scientific ampling of fish and vildlife populations is an essential procedure in the procedure of natural populations in vilderness.

Guidelines

- a. Use only harhods that are compatible with the wilderness environment.
- Gill cecting, battery-operated electrofishing, and other standard techniques of population sampling may be used.
- Closely coordinate sampling activities with the administering agency and schedule them to avoid beary publichmse periods.

7. Chemical Treatment

Chemical transment may be decessary to prepare vacuus for the recarablishment of indigenous species, to protect or recover Federally listed threatened for endangared species, or to correct undesirable conditions resulting from the influence of man. Species of fish traditionally stocaid before vilderness designation may be considered indigenous if the species is likely to survive. Undesirable conditions and affected species shall be identified in wilderness plans.

Guidelines

- a. Use only registered pesticides according to label directions.
- b. In selecting peacitides, give preference to those that will have the lassr impact on non-target species and on the wilderness environment.
- Schedule chemical treatments during periods of low human use, insofar as possible.
- d. Immediately dispose of fish removed in a memor agreed to by the administrating agency and the State agency.

4. Spave Tables

The collection of fish spaws shall be permitted from wilderness when elternative sources are unavailable or unreliable, or where spaws taking was an established practice before wilderness designation.

Cuidelises

- a. Do not use monorized equipment to assist in collecting and famous spare.
- b. Use of techniques and facilities decessary to take speed, which were in existence before wilderness designation, may concide as provided for in the wilderness amangement plan.
- Tacilizies for spawnwakies stations approved after wilderness designation must be removed after the termination of each season's operation.
- d. Decisions to prohibit spaws taking, where it was an escablished practice before wildermass designacion, will be made jointly by the administering agency and the State agency.

9. Pish Stocking

Fish stocking may be conducted by the first agency in coordination with the administering agency, using means appropriate for wilderness, when either of the following criteria is mac: (a) to resetablish or maintain an indigenous apentss adversely affected by human influence; or (b) to perpetuate or recover a chreatened or andaugured species.

Salection of species for stocking will be determined jointly by the administering agency and the State agency. Enotic species of fish shell not be stocked. The order of preference for stocking first species (a) Tedarmally listed threatened or endangered indigenous species, (b) indigenous species. Species of fish traditionally stocked before wilderness designation day be considered indigenous if the species is likely to survive. Numbers and size of fish and time of stocking will be determined by the feats agency.

Sarren Lakes and streams may be considered for scocking, if there is outcome agreement that no appreciable loss of releatific values or adverse effects on wilderness resources will occur.

Cuidelinas

- 4. The State agency shall make fish stacking schedules available to the administrating agency, indicating what species and numbers are planned for each water within a wilderness.
- b. Adjust stocking rates to minimize the likelihood of exceeding the easying capacity of the water being stocked as as to reduce the chance of producing a population imbalance and to minimize the likelihood of attracting overtee destrimantal to the wilderness resource.

10. Aerial Fish Stocking

Aerial scocking of fish shall be permitted for those vaters in wilderness where this was an established practice before wilderness designation or where other practical enems are not available. Aerial stocking requires approval by the administering agency.

<u>Guidelicas</u>

a. As justification for satial stocking, the State stacky will supply the administering squary a list of those vaters where stocking with aircraft was an established practice before wilderness designation, indicating the type of siturati used (fixed-wing or helicopter). This justification will become a part of the wilderness management plan.

7

- b. To stock waters that had not been derially stocked before wilderness designation, the Steen agency will demonstrate to the soministaring agency the hand for using aircraft.
- c. Plan eircraft flights over wilderness to minimize disturbence. Consider season of year, time of day, route and eltitude of flight, and location of Landing areas on the perimenes of the wilderness.

11. Transplanting Wildlife

Transplants (removal, reintroduction, or supplemental introduction) of terrestrial wildlife appeals in wilderness may be permitted if necessary: (a) to perpetuate for recover a threatened of endangered species; or (b) to restore the population of an indigenous species eliminated or reduced by bunen influence.

Transplants shall be made in a sammer compatible with the wilderness character of the area. Transplant projects, including follow-up monitoring, require advance written approval by the administering agency.

<u>Guidelines</u>

 According methods and componery holding and handling facilities may be permissed if they are the minimum accessary to accomplish an approved exhauglanc.

12. Wildlife Damage Control

Gildlife demage control in wilderness may be necessary to protect Referally listed attractaned or endangered spacies, to prevent transmission of disesses or parasites affecting other widdlife and humans, or to prevent serious lasses of demestic tivescock. Control of conindigenous species also may be decassary to reduce conditions with indigenous spacies, particularly if the latter species are threatened or endangered.

Guidelines

a. Acceptable control measures include lethel and monitchal methods, depending upon need, justification, location, conditions, efficiently and applicability of State and Federal laws.

- b. Control measures will be implemented by the Animal and Plant Health Inspection Service, the administrating agency, the State fish and wildlife agency, or other approved State agency, purbuant to conservative agreements or magazands of underscholing. Wildlife damage control must be approved by the administering agency on a case-by-case basis.
- c. Direct control at individual animals causing the problem.
- d. Use only the minimum amount of control necessary to solve the problem.
- Use particises only where other measures are impractical. Use only registered perticises ectorsing to label directions and subject to the following rearrictions:
- 1) Pescicides may be applied only by cartified pescicide applicators.
- The placement of pesticides shall be eccurately indicated on the largest scale USGS cap available.
- Place varning signs at the entiauce to the area where perficides are being used to vern the public of any dangers to themselves or their secs.
- 4) In the selection of postisides, give preference to those that will have the least impact on non-target species and on the wilderness environment.

13. Visitor Hansgement to Protect Wilderness Wildlife Resources.

Nany wildlife spacies are sensitive to human entroschments on their ranges. Gritarly bear, highorn sheep, elk, mountain goet, birds of prey (such as peregrice falcon and bald eagle), other migratory and resident birds, and certain other wilderness wildlife species cannot tolerate excessive human disturbance, particularly during carcain segsons of the year.

When necessary to reduce human disturbance to a wildlife species, the deministering agency, necordination with the State agency, may take direct or indirect management actions to control visitor use.

Guidelians

- Specify in the wilderness management plan the management actions necessary and the spency responsible to reduce conflicts with wildlife.
- b. If and when in becomes apparent that public use is significantly degrading the wildermass wildlife resources, limitations on visitor use any be imposed and enforced by the appropriate agency. Any limitations will be applied equirably to all wildermass winitness.

The objectives of fire management in wilderness are to: (a) permit lightering-caused fires to play, as userly as possible, their satural acological role within wilderness and (b) reduce, to as acceptable level, the risks and consequences of wildfire within wilderness or escaping from wilderness. Fire ignified by lightering will be permitted to burn or will be suppressed as prescribed in an approved plan. Prescribed fires ignited by man may be permitted to reduce unmatural buildup of fuels only if occasiony to make objectives (a) and (b) above. Although additional benefits may result from manufaciated prescribed fire, vegetative sampulation will not be used to justify such fires.

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Bureau of Land Management, 1994

Letters from county and local agencies



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Battlet Manager

Roberta McMullin Secretary Treasurer Suite 1 Suite 1 St. George, Utah (84770) Office: (801) 673-3617 Fax: (801) 673-4921 BOARD OF DIRECTORS

C. Jack Lemmon, Chelman Mn E. Barlow Dala Gubba Dennis (verson Weyne G. Nuttall Ray S. Schmutz John H. Wadeworth

April 5, 1994

Mr. Lester Rosenkranca State Director Bureau of Land Management 3707 North 7th Street Phoenix, AZ 85014

Dear Les:

The Mashington County Water Conservancy District has participated in the Wild and Scenic River evaluation process on a number of occasions. We have also on file a number of requests we made for information, not only to the local office but to the Arizona State Office and the Bursau's Mashington office. We have also requested to be kept informed of any decisions or reports relating to Wild and Scenic River designation on the Virgin Biver.

In spite of this written and verbal record of participation in the process and requests to be kept informed as the process proceeded, we were entirely left off from the list of agencies and organizations to whom copies of the draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement was sent.

He are at a loss to understand how this oversight could have happened and we wish to register a strong protest to this omission.

As the agency specifically charged with water management and development in Washington County, and the agency most likely to be effected by designation and protective management measures on upstream water users, we ask that you take immediate steps to see that the Washington County Water Conservancy District is added to the list of agencies who wenger involved in the process and receive copies of all pertinents.

documents.

RWT/rm

Respectfully,

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Response 2 - 1: The necessary changes have been made in the mailing list and the list of agencies in the final document has been revised to include the Washington County Conservation District.

FeX NC. 602428596:

F. 01 JUN 3 0 1936



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Post-Kir brand fax transmittal memo 7871 (* staeges * 5

GRAHAM COUNTY BOARD OF SUPERVISORS GRAHAM COUNTY COURTHOUSE - ECO MAIN STREET - PHONE 428-3250 SAFFORD, ARIZONA 85548

DELBERT HOUSEHOLDER, CHAIRMAN TERRY J. BINGHAM, HEHBER HAYNES MOORE, HERBER June 29, 1994

JOE CARTER COUNTY HARAGER BARBARA FELIX, CLERK

1721-325D 428-5951

Pail moulant " to Carter haham Count Mr. Phil Moceland, Chief

Branch of Planning Arizona State Office PO Box 16563 Phoenix, Az 85014

RE: Wild and Scenic Rivers Suitability Assessment

Dear Mr. Moreland:

Me, in a letter dated Mey 23, 1994, submitted formal comments to you on the Sureau's Wild and Scenic Rivers Legislative and Environmental Impact Statement. Naving reviewed proposed segments in Graham and Greenlee Countries more closely we thought it important to subsit supplemental comments and questions sawking clarification. Nore specifically our comments will focus on the lower San Francisco River, Gilla River (Gila Box), Bontea Creek and Araviago Creek.

LOWER SAN FRANCISCO RIVER - The proposed 6.4 miles lies dust to the south of the LOMER SAN FRANCISCO RIVER - The proposed 6.4 miles lies just to the south of the Copper Mountain Mining District in Greenles Councy. This river was studied jointly by the Forest Service and BLM in the early 1980's. At that time it was determined unsuftable due to lack of public support, impacts on ephortunities for flood control structures, water storage and impacts on mineral and geothermal development. Each of these conditions are more important to us today than in 1982. The study area lies just south of the Copper Nountain Mining District. Mining is a greater part of our economic base than it was thelve years ago. It is the largest producing sine in the United States and employs 2,400 workers at an average annual salary of \$34,700 dollars. Even though the mine is located in Greanlee County approximately one third of that work force lives in Gerham County and commutes daily. The remaining workers shop in the Graman County radas County and commutes daily. The remaining workers shop in the Graham County tradas and services centers. They contribute significant dollars to that sector of our economic base annually. The draft EIS alludes to threats and adverse inpacts created by mining operations even though those operations are on adjacent private

THE BUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM IMPACT ON EMPLOYMENT LEVELS AT THE HIME INCLUDING THE DOWNLO EFFECT IN TENS OF REGATIVE IMPACT ON RETAIL TRADES. SALES AND SERVICES SHOULD DESIGNATION OCCUR. 40-2

The proposal also calls for acquisition of about five hundred ninety (590) acres

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

Response 40 - 1: The recommended alternative considers additional power lines and acknowledges impacts of mine operations and expansion on the scenic values of the study area. The Wild and Scenic Rivers Act does not empower the federal government to regulate uses on private lands. The recommended alternative is not expected to impact operation and future expansion of the Phelps Dodge mine at Morenci.

Response 40 - 2: Please refer to general response # 6 (Land Acquisition).

40-1

of adjacent private lands. The Bureau in its dreft EIS failed to complete an analysis and identify that land's current economic contribution to area economies and the long term impact by becoming public lands on those economies and property taxation losses which support taxation losses which support taxations.

THE BUREAU PUST PROVICE AM AMALYSIS OF THE LONG TERM IMPACT SHOULD DESIGNATION OCCUR AND THOSE PRIVATE LANDS BE REMOVED FROM PROPERTY TAX ROLLS AND ECONOMIC LOSS DATA.

40-3

The draft also alludes to threats and adverse inducts on future power transmission innes which support the high tech mining operations and are crucial to cost effective mining operations. The draft EIS anticipates that the mining operations will need additional power. It also indicates that new power lines will be routed through the existing corridor. What suthoritive bests lead the Bureau to believe that the existing corridor would accommodate future power transmission lines for the existing corridor proves to be finadequate for future transmission line needs the Bureau must identify cost for alternative routes should designation occur and the accommod impact of that cost.

IF THERE IS NO AUTHORITIVE BASIS FOR THIS STATEMENT THE BUREAU WHIST PROVIDE AN AUGUSTS TO SUPPORT THAT CONCUSSION. THE ANALYSIS MUST BE FOR A PERIOD MORE REFLECTIVE OF THE MIRES FUTURE LIFE AS OPPOSED TO THE IMPOSATE TURNITY LEAR PERIOD.

40-4

The draft IIS also focuses on geothermal development, recreational activity including sand rafls, flood control structures and waster storage. Geothermal anergy development research continues and waster apposed to restrictions which may impair such opportunities for an alternative energy source. Such development could occur and contribute significantly to our sconomy. Sand rafl recreation has become increasingly popular in the GrahamyGreenles County area. This recreational activity attracts folks from throughout southeastern Arizona. The Sureau Failed to provide an analysis of the economic contribution of this recreational activity and negative impact on the retail trades, sales and services component of our economic base by limiting such use. The Bureau further alludes to no activity within the next twenty years with respect to floods control structures. The GrahamyGreenlee County area remains subject to frequent medion flood events, which affect our accommines and traditional uses of both private and public lands. In-fact such flood events occur almost every three years fevents for the last thirty years are well documented in terms of rhecopy cast and economic losses. The financial impact for the thirty year period chrough an analysis and provided and public lands. Experts for the last thirty years are well documented in terms of rhecopy cast and economic losses. The financial impact for the thirty year period chrough January 1993 has exceeded three hundred million (3100,000,000) dollars. Ensolution of flood control issues and water storage continues to be a high priority for GrahamyGreenlee County elected officials and community leaders along with their counterprates in southmest New Mexico.

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40-6

40-5

THE BUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM ECONOMIC IMPACT SHOULD DESIGNATION OCCUR IN TERMS OF LIMITING OR RESTRICTING OPPORTUNITIES WHICH EXIST AS WE ATTEMPT TO RESOLVE THIS COMERM.

GILA RIVER (GILA BOX) - The proposed 26.6 miles lies between two large copper mining districts. Those are the Copper Mountain Mining District in Greenles County which was addressed in our comments on the lower San francisco River and the Sanchez, San Juen, Dos Pobres and Lonester Mining District in Graham County, While the study area is not in any astablished mineral district the draft EIS does identify mineral deposits immediately beyond the southwestern terminus of the study area. As reported in the draft decoment the Sanchez mine is scheduled to begin operations in 1995 creating the hundred (200) plus jobs for the next

Response 46 - 3: The preferential use of existing corridors for additional power lines was established in the Safford District Resource Management Plan. This corridor would be preferred for additional power lines regardless of wild and scenic river designation. Ongoing management actions would address additional power line needs on a case by case basis. The Wild and Scenic Rivers Act discourages but does not prohibit new utility corridors that cross designated river segments.

Response 40 - 4: According to data available to the Bureau of Land Management, geothermal resources in the area do not have the required characteristics for power generation. See the discussion on page 133 of the Final Safford District Resource Management Plan (1991).

Response 40 - 5: Please refer to general response # 2 (Economic Impacts).

Response 40 - 6: The Bureau of Land Management is not aware of any water retention or flood control structures ithat have been proposed within the study area. Proposed levees and riprapping in the Clifton area and upstream dams would not be impacted by designation. page 3

Twenty years at an average annual salary of \$30,000 dollars. Phelps Oodge has announced its intent to move forward with development of properties in Graham County. They hops to be operational within the next five years according to their Chairman of the Board. Phelps Dodge anticipates approximately six hundred (600) new jobs will be created at their films at an average annual salary of \$35,000 dollars.

SMOULD THIS DESIGNATION OCCUR THE BURLAU MUST ASSURE AREA CITIZENS THAT IT WILL NOT IMPACT THE SCHEDULED DEVELOPMENT OF THOSE PROPERTIES AND THEIR OPERATION IN THE YEARS TO COME. IF-IN-FACT THERE MAY BE A IMPRETENSED IMPACT THE BUREAU MUST INCLUDE AM ANALYSIS OF THE ARTICIPATED LONG TERM ECONOMIC LOSS.

40-7

The designation alludes to additional permanent congressions; protection of free flowing waters in the Gila River. While flows on the Gila River flictuate dramatically from minimal, to moderate to extrace levels during the frequent flood events the available water resources in any given year do not east current entitlements of vertures users as determined under the 1935 Giobe Equity Decree. These waters are managed by a federally appointed commissioner. Agriculture and others entitled to portions of this resource must annually supplement their proportioned share by pumping ground water. The most single significant pumpovernment component of Granam County's sconomic base is agriculture. If represents just over thirty percent of the countywide accommy. It also holds significant water rights, although it has not received in any given year its full entitlement.

40-8

THE BUREAU FAILED TO PROVIDE AN AMALYSIS OF THE ECONOMIC IMPACT IF DESIGNATION RESULTED IN REQUESTION MINIMAL IN-STRUM FLOWS. SUCH ACTION WOULD PRIVABILITY AFFECT THE UPPER GILD RIVER USERS AND THEIR COUNTERPARTS IN THE MATER SHED AREA IN SAUTHMESTERN MEM MEXICO, MORE SO THAN DOWN STREAM BELOW THE COLLIDER DAW.

8

This section of the river, in spite of designation as a Riparian Macional Conservation Area, continues to be a popular recreational area. Recreational activities range from individual family outings to large gatherings. The area has tracitionally been most popular for Graham/Greanlee area citizens. It has also been an attraction for citizens from throughout southeastern Arizona for wide variety of recreational purposes.

40-9

THE BUREAU FAILED TO PROVIDE AN ANALYSIS OF THE IMPACT IN TERMS OF TRADITIONAL USES AND ECONOMIC LOSSES IN THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF OUR ECONOMIC BASE THROUGH LIMITIMG OR LOSS OF EXISTING RECREATIONAL USES.

40-10

The proposal also recommends acquiring about five hundred (500) acres of private lands. Braham County consists of a landmass of just over 4,600 square miles. About six percent of that landmass is private and must bear the burden of property laxation in support of statification governments and education, while public lands pay P(II in lieu of property taxation the payment formula has not been adjusted since its creation in 1975. The Buresu failed to complete an analysis and fountify the land's current economic contribution to the area.

THE BUREAU MUST PROVIDE AM AMALYSIS OF THE LONG TERM IMPACT SHOULD DESIGNATION DECOR AND THOSE PRIVATE LANDS BE REMOVED FROM PROPERTY TAX BOLLS AND ECONOMIC LOSS DATA.

40-11

The craft EIS indicates that portions of sight livestock grazing allottents are in the study area. That portion of the allottents actually in the study area ranges from one percent to fifty one percent. The proposed plan calls for removal of livestock from the upper end of the study area and, on a limited basis, down stream to the end of the Study area. The Bureau failer to provide an accompany

Response 40 - 7: Please refer to general responses # 4 (Federal and State Water Rights), and # 12 (Visual Impacts). There would be no adverse impacts from possible water rights or visual management on the potential development of the mining properties. In addition, the Wild and Scenic Rivers Act does not empower the Bureau of Land Management to regulate or control nonfederal lands or activities on nonfederal lands.

Response 40 - 8: Please refer to general responses # 4 (Federal and State Water Rights) and # 5 (Instream Flow Water Rights).

Response 40 - 9: Please refer to general response # 2 (Economic Impacts).

Response 40 - 10: Please refer to general response # 6 (Land Acquisition).

Response 40 - 11: The decision to defer livestock grazing in the Gila Box was made in the Upper Gila San Simon Grazing Environmental Impact Statement (completed in 1978). This decision is incorporated by reference into the Safford District Resource Management Plan. The decision to defer livestock grazing would be implemented regardless of Congressional designation of this study area.

page 4

analysis of the impact of the nanching community from this oroposed action and the domino effect on the retail trades, sales and services industry. Unlike some areas in the western United States, Graham County ranching operations are small family businesses. Ranching has provided for the economic well being of those families for many years.

THE BUREAU MUST PROVICE AM ANALYSIS OF THE LONG TERN IMPACT ON THESE BUSINESSES INCLUDING THE COMMING EFFECT ON THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF DUR ECOMODIC BASE.

40-12

The draft EIS also focuses on geotherms! resources and in-fact the Gillard Hot Springs is the hottast spring in the state with an average surface temperator [100]. It further indicates that this resource could be used as a heat source. It appears that the Gillard Hot Spring geothermal resource has the nighest development potential use even though geothermal resource exist at three of the five segments being considered in the Schman/Greeniee area.

ME UNGE THE BUREAU TO CONSIDER THIS POTENTIAL ALTERNATIVE EMERGY SOURCE AND NOT RECOMMEND ANY ACTION WHICH WILL LIMIT OR PROPRIET SUCH DEVELOPMENT OPPORTUNITIES.

40-13

BOMITA CREEK - The proposed 3.1 miles lies between the two major mining deposits identified in our comments on the lower San Francisco and Sila river segments. This proposal also calls for the acquiring of nine hundred sevency (970) acres of private land. Again it also impacts grazing allotments, recreational uses, utility facilities including the primary exter source facility owned by the City of Safford, Safford provides comments water for about sixty five (55%) percent of the total county population of 26,000. Threats to the proposal include mining, grazing, recreational uses, transportation corridors and utilities.

. ∞ ∔0-14 THE BUREAU MUST PROVIDE AK AMALYSIS OF THE LONG TERM ECONOMIC IDPACT OF DESIGNATION MERE IT TO OCCUR. THAT AMALYSIS MUST FOCUS ON MINING EMPLOTHENT LEYELS COMENIC MELL BEING OF RANCHING AMALYSIS, IMPACTS ON SUPPOND'S PRIMARY DOMESTIC MATER SOURCE, RECREATION, UTILITY CORRIDORS AND THE OCNINO EFFECT ON OUR RETAIL TRADES, SALES AND SERVICES.

ARRYAIPA CREEK - The proposal calls for all 10 miles of Aravaipa Creek. This proposal will impact four grazing allolments, recreational opportunities and the antire economic base for the small (londyke community located about sixty miles from the County Seat.

40-15

AGAIN THE BUREAU MUST PROVIDE AU AUALYSIS ON THE LONG TERM (MPAET ON RANCHING, AGRICULTURE AND RECREATIONAL OPPORTUNITIES. THAT AMALYSIS MUST FOCUS ON THE EXTIRE ECONOMIC STRUCTURE OF KLONOYKE AS WELL AS ITS CONTRIBUTION TO THE COUNTY TRADES, SALES AND SERVICES ECONOMIC SECTOR.

in closing Graham/Greenlee County area elected officials and community leaders feel that the Bureau of Land Management has not provided adequate cate in tarms of the comulative social and accounts impact of these proposals. More specifically, and in addition to our specific site concerns, we believe that the Bureau must respond and evaluate the two county impact from a cumulative perspective on the following issues.

40-16

LONG TERM IMPACT ON NINING EMPLOYMENT LEVELS IN GRAHAMAGREENLES COUNTIES INCLUDING REVENUE LOSSES OF NIXING JOBS AT AN AVERAGE ANNUAL SALARY OF \$30,000 DOLLARS PLUS AND LIBERAL HEALTH CARE BENEFIT PACKAGES YERES CREATION OF SERVICE INDUSTRY JOBS WHICH ARE ROMBALLY AT OR BEAR MININAM MAGE WITH NO HEALTH CARE BENEFITS.

Response 40 - 12: According to data available to the Bureau of Land Management, geothermal resources in the area do not have the required characteristics for power generation. See the discussion on page 133 of the Final Safford District Resource Management Plan (1991).

Response 40 - 13: Please refer to general response # 6 (Land Acquisition).

Response 40 - 14: Please refer to general responses # 1 (Alternatives) and # 2 (Economic Impacts).

Response 46 - 15: Please refer to general responses # I (Alternatives) and 2 (Economic Impacts).

Response 40 - 16: Cumulative impacts were addressed in each of the river study area legislative environmental impact statements as well as in the statewide wild and scenic river legislative environmental impact statement. See general response # 2 (Economic Impacts).

FAX NE. 8024285951

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LOBERTIFY THE PULLALIAN ECONOMIC LOSS INCLUDING LOSS OF PROPERTY TAXATICM COLLARS SHICH SUPPORT STATE/LOCAL GOYERWAINT AND EDUCATION IF THE 2100 ACRES OF PRIVATE LARGS SECOME PUBLIC.

ECONOMIC IMPACT BY LIMITING RECREATION AND IN SOME CASES COMPLETE LOSS OF CURRENT RECREATIONAL ACTIVITIES ON THE THE RETAIL TRADES, SALES AND SERVICES INDUSTRY. TOUR AMPLYSIS SHOULD ALSO FOCUS ON TRADSTORMAL RECREATIONAL USES BY CITIZENS FROM THACUGHOUT SOUTHEAST ARIZONA.

LONG TERM ECONOMIC IMPACT ON THE SMALL RANCHING BUSINESSES AS MILL AS THEIR CONTRIBUTION TO THE RETAIL TRADES, SALES AND SERVICES ECONOMIC SECTOR.

WATER RIGHTS AND RESOURCES IMPACTED BY MINIMUM IN-STREAM FLOW REQUIREMENTS INCLUDING DIRECT INFACT ON THE AGRICULTURAL COMMUNITY, MINING AND SAFFORD'S COMESTIC MATER SUPPLY SYSTEM.

EMPACT ON TRANSPORTATION CORRIDORS, WILLITY CORRIDORS AND THE COST FOR ALTERNATIVES TO MEET THESE MELDS SHOULD EXISTING CORRIDORS BE IMADEQUATE.

SOCIAL AND ECONOMIC IMPACT BY ADDING WILD AND SCENIC RIVER DESIGNATION TO THE EXISTING GILA BOX REPARTAM MATIGMAL CONSERVATION AREA, UNIQUE MATER SUPPLY RESTEMATION IN THE BOURTA CREEK AND CRITICAL MADITAT OF THE GILM REVER.

40-17

The proposed segments within the Graham/Greenlee County area consist of 51.1 Tiver The proposed segments within the Graham/Greenlee County area consist of 51.1 five sides consuming acts 17,000 acres of public and private leads. Each of the proposed segments are already afformed anhanced federal protection above and beyond the normal agency land management plan. Those enhanced protection measures are the Eila Box Ripairan Mational Conservation Area, Unique Mater Supply Designation on Sonita Creek, Critical Habitat Designation of the Gila River up to its one hundred year flood plan, etc.

Your consideration and response to the specific site and cumulative impact questions would be greatly appreciated. Again thank you for the opportunity to comment.

Sincerely.

GRAHAM COUNTY BOARD OF SUPERVISORS

Delbut Householder, Chairman

Heches Merce Hayses Moore, Member

Turny J. Bingham, Member

Response 40 - 17: Please refer to general response #7 (Multiple Designations).

JU fine



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GRAHAM COUNTY BOARD OF SUPERVISORS

GRAHAM COUNTY COURTHOUSE - 800 MAIN STREET - PHONE 428-3250 SAFFORD, ARIZONA 85546

BUPERVISORS
DELBERT HOUSEHOLDER, CHARMAN
TERRY J. BINGHAM, MEMBER
KAYNES MOORE, MEMBER
JURE 29, 1994

JOE CARTER, COUNTY HANAGER BARBARA FELIX, CLERK

Mr. Phil Moreland, Chief Branch of Planning Arizona State Office PO 80x 16563 Phoentx, Az 86014

RE: Wild and Scenic Rivers Suitability Assessment

Dear Mr. Moreland:

ა ⁴⁹⁻¹

Me, in a letter dated May 23, 1994, submitted formal comments to you on the Bureau's Wild and Scenic Rivers Legislative and Environmental Impact Statement. Having reviewed proposed segments in Graham and Greenlee Counties more closely we thought it important to submit supplemental comments and questions seeking clarification. More specifically our comments will focus on the lower San Francisco River, Gila River (Gila Box), Booits Creek and Araviapa Creek

LOMER SAN FRANCISCO RIVER - The proposed 6.4 miles lies just to the south of the Copper Mountain Mining District in Greenlee County. This river was studied jointly by the Forest Service and Blk in the early 1980's. At that time if was determined unsuitable due to lack of public support, impacts on opportunities for flood control structures, water storage and impacts on mineral and geothermal development. Each of these conditions are more important to us today than in 1982. The study area lies just south of the Copper Mountain Mining District. Mining is a greater part of our economic base than it was twelve years ago. It is the largest producing mine in the United States and employs 2.400 workers at an average annual salary of \$34,700 dollars. Even though the mine is located in Greenlee County approximately one third of that work force lives in Graham County and commutes daily. The remaining workers shop in the Graham County trades and services centers. They contribute significant dollars to that sector of our economic base annually. The draft EIS alludes to threats and adverse impacts created by mining operations even though those operations are an adjacent private lands.

THE DUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM IMPACT ON EMPLOYMENT LEVELS AT THE MINE INCLIDING THE DOWNLO EFFECT IN TERMS OF MEGATIVE IMPACT ON RETAIL TRADES, SALES AND SERVICES SHOULD DESIGNATION OCCUR.

The proposal also calls for acquisition of about five hundred minety (590) acres

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

Response 49 - 1: Please see the responses to comment letter 40.

of adjacent private lands. The Bureau in its draft EIS failed to complete an analysis and identify that land's current economic contribution to area economies and the long term impact by becoming public lands on those economies and property taxation losses which support state/local governments and education.

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The draft also alludes to threats and adverse impacts on future power transmission lines which support the high tech mining operations and are crucial to cost effective mining operations. The draft EIS anticipates that the mining operations will need additional power. It also indicates that new power lines will be routed through the existing corridor. What authoritive basis lead the Sureau to believe that the existing corridor would accommodate future power transmission lines? If the existing corridor proves to be inadequate for future transmission line needs the Bureau must identify cost for alternative routes should designation occur and the economic impact of that cost.

IF THERE IS NO AUTHORITIVE BASIS FOR THIS STATEMENT THE BUREAU MUST PROVIDE AN ANALYSIS TO SUPPORT THAT CONCLUSION. THE ANALYSIS MUST HE FOR A PERIOD MORE REFLECTIVE OF THE MINES FUTURE LIFE AS OPPOSED TO THE IMMEDIATE THENTY YEAR PERIOD.

The draft EIS also focuses on geothermal development, recreational activity including sand rails, flood control structures and water storage. Geothermal energy development research continues and we are opposed to restrictions which may impair such opportunities for an alternative energy source. Such development could occur and contribute significantly to our economy. Sand rafl recreation has become increasingly popular in the Graham/Greenlee County area. This recreational activity attracts folks from throughout southeastern Arizona. The Bureau failed to provide an analysis of the economic contribution of this recreational activity and negative impact on the retail trades, sales and services component of our economic base by limiting such use. The Bureau further alludes to no activity within the next twenty years with respect to floods control structures. The Graham/GreenTee County area remains subject to frequent major flood events, which affect our economies and traditional uses of both private and public lands. In-fact such flood events occur almost every three years. Events for the last thirty years are well documented in terms of recovery cost and economic losses. The financial impact for the thirty year period through January 1993 has exceeded three hundred million (\$300,000,000) dollars. Resolution of flood control issues and water storage continues to be a high priority for Graham/Greenlee County elected officials and community leaders along with their counterparts in southwest New Mexico.

THE BUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM ECONOMIC IMPACT SHOULD DESIGNATION OCCUR IN TERMS OF LIMITING DR RESTRICTING OPPORTUNITIES WHICH EXIST AS HE ATTEMPT TO RESOLVE THIS CONCERN.

GILA RIVER (GILA BOX) - The proposed 26.6 miles lies between two large copper mining districts. Those are the Copper Mountain Mining District in Greenlee County which was addressed in our comments on the lower San Francisco River and the Sanchez, San Juan, Dos Pobres and Lonestar Hining District in Graham County. While the study area is not in any established mineral district the draft EIS does identify mineral deposits immediately beyond the southwestern terminus of the study area. As reported in the draft document the Sanchez mine is scheduled to bagin operations in 1995 creating two hundred (200) plus jobs for the next

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The designation alludes to additional permanent congressional protection of free flowing waters in the Gila River. While flows on the Gila River fluctuate dramatically from minimal, to moderate to extreme levels during the frequent flood events the available water resources in any given year do not meet current entitlements of various users as determined under the 1935 Globe Equity Decree. These waters are managed by a Federally appointed commissioner. Agriculture and others entitled to portions of this resource must annually supplement their proportioned share by pumping ground water. The most single significant non-government component of Graham County's economic base is agriculture. It represents just over thirty percent of the countywide economy. It also holds significant water rights, although it has not received in any given year its full

THE BUREAU FAILED TO PROVIDE AN AMALYSIS OF THE ECONOMIC IMPACT IF DESIGNATION RESULTED IN REQUIRING MINIMAL IM-STREAM FLOWS. SUCH ACTION MOULD PRIMARILY AFFECT THE UPPER GILA RIYER USERS AND THEIR COUNTERPARTS IN THE MATER SHED AREA IN SOUTHWESTERN NEW MEXICO, MORE SO THAN DOWN STREAM BELOW THE COLLIDGE DAM.

This section of the river, in spite of designation as a Riparian National Conservation Area, continues to be a popular recreational area. Recreational activities range from individual family outings to large gatherings. The area has traditionally been most popular for Graham/Greenlee area citizens. It has also been an attraction for citizens from throughout southeastern Arizona for a wide variety of recreational purposes.

THE BUREAU FAILED TO PROVIDE AN AMALYSIS OF THE IMPACT IN TERMS OF TRADITIONAL USES AND ECONOMIC LOSSES IN THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF OUR ECONOMIC BASE THROUGH LIMITING OR LOSS OF EXISTING RECREATIONAL USES.

The proposal also recommends acquiring about five hundred (500) acres of private lands. Braham County consists of a landmass of just over 4,600 square miles. About six percent of that landmass is private and must bear the burden of property taxation in support of state/local governments and education. While public lands pay PILT in lieu of property taxation the payment formula has not been adjusted since its creation in 1976. The Bureau failed to complete an analysis and identify the land's current economic contribution to the area.

THE SUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM IMPACT SHOULD DESIGNATION OCCUR AND THOSE PRIVATE LANDS BE ALMOVED FROM PROPERTY TAX ROLLS AND ECONOMIC

The draft EIS indicates that portions of eight livestock grazing allotments are in the study area. That portion of the allotments actually in the study area ranges from one percent to fifty one percent. The proposed plan calls for removal of livestock from the upper end of the study area and, on a limited basis, down stream to the end of the study area. The Bureau failed to provide an economic analysis of the impact on the ranching community from this proposed action and the domino effect on the retail trades, sales and services industry. Unlike some areas in the western United States, Graham County ranching operations are small family businesses. Ranching has provided for the economic well being of those families for many years.

THE BUREAU MUST PROVIDE AN AMALTSIS OF THE LONG TERM IMPACT ON THESE BUSINESSES INCLUDING THE DOMINO EFFECT ON THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF OUR ECONOMIC BASE.

The draft EIS also focuses on geothermal resources and in-fact the Gillard Hot Springs is the hottest spring in the state with an average surface temperature of 180°. It further indicates that this resource could be used as a heat source. It appears that the Gillard Hot Spring geothermal resource has the highest development potential use even though geothermal resources exist at three of the five segments being considered in the Graham/Greeniee area.

WE URGE THE BUREAU TO CONSIDER THIS POTENTIAL ALTERNATIVE EMERGY SOURCE AND NOT RECOMMEND ANY ACTION WHICH WILL LIMIT OR PROMIBIT SUCH DEVELOPMENT OPPORTUNITIES.

BORITA CREEK - The proposed 8.1 miles lies between the two major mining deposits identified in our comments on the lower San Francisco and Gila river segments. This proposal also calls for the acquiring of nine hundred seventy (970) acres of private land. Again it also impacts grazing allotments, recreational uses, utility facilities including the primary water source facility owned by the City of Safford. Safford provides domestic water for about sixty five (65%) percent of the total county population of 26,000. Threats to the proposal include mining. grazing, recreational uses, transportation corridors and utilities.

THE BURLAU MUST PROVIDE AN ANALYSIS OF THE LONG TERM ECONOMIC INPACT OF DESIGNATION MERE ET TO OCCUR. THAT AMALYSIS MUST FOCUS OM MINING EMPLOYMENT LEVELS, ECOMOMIC MELL BEING OF RANCHING FAMILIES, IMPACTS ON SAFFORD'S PRIMARY DOMESTIC MATER SOURCE, RECREATION, UTILITY CORRIDORS AND THE DOMING EFFECT ON OUR RETAIL TRADES, SALES AND SERVICES.

ARAYAIPA CREEK - The proposal calls for all 10 miles of Aravaipa Creek. This proposal will impact four grazing alloiments, recreational opportunities and the entire economic base for the small Klondyke community located about sixty miles from the County Seat.

AGAIN THE BUREAU MUST PROVIDE AN AMALYSIS ON THE LONG TERM IMPACT ON RANCHING, AGRICULTURE MORECREATIONAL OPPORTUNITIES. THAT AMALYSIS MUST FOCUS ON THE SHITRE ECONOMIC STRUCTURE OF ELONDYKE AS MELL AS ITS CONTRIBUTION TO THE COUNTY TRADES, SALES AND SERVICES ECONOMIC SECTOR.

In closing Graham/Greenlee County area elected officials and community leaders feel that the Bureau of Land Management has not provided adequate data in terms of the cumulative social and economic impact of these proposals. More specifically, and in addition to our specific site concerns, we believe that the Bureau must respond and evaluate the two county impact from a cumulative perspective on the following issues.

LONG TERM IMPACT ON MINING EMPLOYMENT LEVELS IN GRAHAM/GREENLEE COUNTIES INCLUDING REVENUE LOSSES OF MINING JOBS AT AN AVERAGE ANNUAL SALARY OF \$20,000 DOLLARS PLUS AND LIBERAL HEALTH CARE BENEFIT PACKAGES VERSES CREATION OF SERVICE INDUSTRY JOBS WHICH ARE NORMALLY AT OR NEAR MINIMUM WASE WITH NO HEALTH GARE BENEFITS.

page 5

IDENTIFY THE POTENTIAL ECONOMIC LOSS INCLUDING LOSS OF PROPERTY TAXATION DOLLARS MHICH SUPPORT STATE/LOCAL GOVERNMENT AND EDUCATION IF THE 2100 ACRES OF PRIVATE LANDS BECOME PUBLIC.

ECONOMIC IMPACT BY LIMITING RECREATION AND IN SOME CASES COMPLETE LOSS OF CURRENT RECREATIONAL ACTIVITIES ON THE THE RETAIL TRADES, SALES AND SERVICES INDUSTRY.
YOUR ANALYSIS SHOULD ALSO FOCUS ON TRADITIONAL RECREATIONAL USES BY CITIZENS FROM THROUGHOUT SOUTHEAST ARIZONA.

LONG TERM ECONOMIC IMPACT ON THE SHALL RANCHING BUSINESSES AS WELL AS THEIR CONTRIBUTION TO THE RETAIL TRADES, SALES AND SERVICES ECONOMIC SECTOR.

MATER RIGHTS AND RESOURCES IMPACTED BY MINIMUM IN-STREAM FLOW REQUIREMENTS INCLUDING DIRECT IMPACT ON THE AGRICULTURAL COMMUNITY, MINING AND SAFFORD'S DOMESTIC MATER SUPPLY SYSTEM.

IMPACT ON TRANSPORTATION CORRIDORS, UTILITY CORRIDORS AND THE COST FOR ALTERNATIVES TO MEET THOSE MEEDS SMOULD EXISTING CORRIDORS BE IMADEQUATE.

SOCIAL AND ECONOMIC LAPALT BY ADDING MILD AND SCENIC RIVER DESIGNATION TO THE EXISTING GIAL BOX RIPARIAN NATIONAL COMSERVATION AREA, UNIQUE MATER SUPPLY DESIGNATION IN THE BONITA CREEK AND CRITICAL MADITAT OF THE GILA RIVER.

The proposed segments within the Graham/Greenlee County area consist of 51.1 river miles consuming some 17,000 acres of public and private lands. Each of the proposed segments are already afforded enhanced federal protection above and beyond the normal agency land management plan. Those enhanced protection measures are the Gila Box Ripairan National Conservation Area, Unique Mater Supply Designation on Bonita Creek, Critical Habitat Designation of the Gila River up to its one hundred year flood plan, etc.

Your consideration and response to the specific site and cumulative impact questions would be greatly appreciated. Again thank you for the opportunity to

GRAHAM COUNTY BOARD OF SUPERVISORS

Delput Householder Delbeyt Householder, Chairman

July 5, 1994 BECEIVED

Mr. Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office PHOERIX, ARIZONA Bureau of Land Management 3707 North 7th Street P. O. Box 1653 Phoenix, Arizona 85011

Re: Comments on Arizona Statewide Wild & Scenic Rivers Draft LEIS

Dear Mr. Moreland:

These comments are submitted on behalf of Greenlee County as a member of the Arizona Rural Water Association (ARWA). I appreciate the opportunity to comment on the Draft Arizona Statewide Wild & Scenic Rivers Legislative Environmental Impact Statement (LEIS).

I believe two of the study areas included the alternatives analyses would have algorificant adverse impacts on Greeniee County if they are selected for inclusion in the Wild & Scenic River System. These proposed river systems are: 1) Gila Box: Lower San Francisco River, and 2) Gila Box: Gila River. The issues of concern are water rights, property taxes, and CAP water use.

On the subject of water rights, the Draft LEIS indicates that private land and water rights within river study areas identified as suitable for designation in the Wild & Scenic River System. would be acquired. The protection and use of water rights are extremely sensitive and controversial issues when associated with new regulatory programs proposed by the Federal government, such as Wild & Scenic River System designations. Any impact on local water rights because of a Wild & Scenic River System designation of either of these two study areas, will significantly impact the economy of Greenlee County. Our economy is based primarily on mining. agriculture, and ranching, all of which depend on secure water rights.

The Draft LEIS states that water rights associated with existing beneficial uses will not be reduced. Please explain how existing beneficial use is defined. It also states that minimum instream flows will be established for river study areas designated as part of the Wild & Scenic River System. Please explain how that process will be implemented considering the fact that water rights claims are currently being adjudicated in Anzona. Also, please explain how, on river systems like the Gila and San Francisco Rivers where all available water has been decreed and is currently being readjudicated, minimum instream flow standards will be established without adversely impacting the ability to expand existing uses which are appurtenant to water rights that are being adjudicated. In addition, please explain how the current regulatory provisions allowing the severance and transfer of water rights will operate when rights are severed from below either of these two areas and transferred to users above these two areas

Regarding property taxes, the Draft LEIS indicates that private land within river study areas identified as suitable for designation in the Wild & Scenic River System, would be acquired. There is a general issue of concern when private lands are removed from the public tax rolls in rural areas, because rural counties generally have a very small private land base for tax collection.

Response 56 - 1: Please refer to general response # 4 (Federal and State Water Rights).

Response 56 - 2: Please refer to general responses # 4 (Federal and State Water Rights) and # 6 (Land Acquisition).

Response 56 - 3: Please refer to general response # 6 (Land Acquisition). The distribution of CAP water is beyond the scope of this document.

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Please explain how local country governments will not be adversely affected by the reduction of private land holdings and the associated property tax base within their boundary, without having to increase the property tax on individuals and businesses.

Finally, there is the issue of using CAP water in rural areas through water exchanges. Please explain bow rural areas such as Clifton, Morenci, and Duncan, would participate in the exchange mechanisms envisioned in the CAP system, if they are faced with minimum instream flows that would have a priority right over exchange water.

56-4

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In summary, I am very concerned regarding the possible designation of the Lower San Francisco River as suitable for inclusion in the Wild & Scenic Rivers System. Such a designation will have an adverse impact on Greenlee County for the reasons discussed herein. Therefore, I support the No Action Alternative for the Lower San Francisco River.

Designating the Gila Box: Gila River segment for inclusion in the Wild & Scenic River System, would not provide additional benefits in terms of management of the resource, beyond that which is available under its current designation as a National Riparian Conservation Area. Therefore, for this reason and the others outlined herein, I support the No Action Alternative for this river study area.

Thank you for the opportunity to comment on the LEIS. Please feel free to contact me at any time regarding issues associated with the Draft LEIS or any other issues.

Sincerely

WKichandon

W. F. Richardson Greenlee County Director, Arizona Rural Water Association

c: D. C. Nelson, Executive Vice-President Arizona Rural Water Association

R. Stokes, Greenlee Courty Administrator

Response 56 - 4: Please refer to general response # 1 (Alternatives).

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WASHINGTON COUNTY 197 East Tabernacle • St. George, Utah 84770

June 30, 1994

CUMTON D. PERUNA

ERIC A. LUIDLOW

CALVIN R. ROBISON

RUSSELL SHERTS County Recorder

GLEMNOOD HUMPHRIES

Country Shardy

ALIS M. RITZ County Transport

Charmen

JERRY B. LEWS Russeu, J. Gallian

FAX (801) 634-5753

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, AZ 85011

NECENTA ARTIZON

Re: Comments on Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

Dear Mr. Moreland:

These comments are directed on behalf of Washington County to the Bureau of Land Management's (BLM's) proposed alternative in the Dreft Arixona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (DLEIS) for the designation of the Virgin River in Arixona (the VR) as a study river under the Wild and Scenic Rivers Act (WSRA).

First and foremost, the VR is not a free-flowing river as defined by the WSRA. There have been numerous and substantial alterations to the stream channel, including massive riprapping of the channel arising from the presence of Interstate Highway 15 though the Virgin River Gorge. The DLIIS describes the riprapalong Segment 2 as "talua slopes from highway construction," in an apparent attempt to avoid the requirements of the WSRA. The description of Segment 3 admits the significant modifications of the waterway for Interstate Highway 15, but nevertheless ignores them in determining that the VR is, nevertheless, "free-flowing." On this basis alone, there is no valid legal basis for BLM's determination that the VR is either eligible or suitable for designation under the WSRA.

In addition, the VR does not offer the outstandingly remarkable values stated in the DLEIS. For example, the riparian areas along the VR are similar to those found throughout southern Utah and northern Arizona. The analysis fails to take into account a proper comparison of the values presented by the VR in

Response 57 - 1: Please refer to general response # 11 (Suitability Determinations).

Response 57 - 2: The outstandingly remarkable values associated with the Virgin River were identified and discussed in Appendix 18 of the Arizona Strip District Resource Management Plan (1991). The Arizona Strip District Resource Management Plan was subject to public review and comment at the time it was prepared.

Mr. Moreland Page 2 June 30, 1994

comparison to other rivers in the region. The perfunctory treatment given to the analysis of outstandingly remarkable values in the DLEIS does not meet the requirements of the BLM Manual or of other applicable law.

The DLEIS's failure to address impacts on existing, valid water rights is unjustified. For example, federa' reserved water rights created by designation may impact applications to change 57-3 uses or points of diversion of existing, valid water rights, even where those rights are senior to the new federal reserved water right. Such impacts, arising from water rights created outside of the operation of state law, which has been designed to take into account the balance of uses, may be severe. These impacts, in fact, may be the most significant which arise from designation and yet they are virtually ignored in the DLEIS. This omission constitutes a failure to meet the requirements of NEPA.

> The DLBIS admits that the "existing and future demands [for the water of the Virgin River) far exceed the river's supply, and yet explicitly chooses not to address in any meaningful fashion the effects that designation would have on these same competing demands. This omission is, on its face, arbitrary and cepricious.

> The refusal to acknowledge the impacts on potential commercial, agricultural and residential development which will arise from limitations on water development constitutes a failure to meet the requirements of NEPA.

Analysis of the impacts of designation of the Virgin River in Erizona without consideration of the impacts of designation of other segments of the river in Utah constitutes an improper segmentation of the analysis. Use of the WSRA to further the purposes of the Endangered Species Act is also improper.

Any protective management of the VR arising from BLM's determination that the river is eligible or suitable for study or designation by Congress under the WSRA is inappropriate and unsupported by law.

Designation of the VR as a study river by Congress under Section 4(a) of the WSRA is inappropriate. The VR does not meet the requirements of the WSRA and therefore should not be studied further. Since it does not meet the requirements of the WSRA, treatment as a Congressionally designated study river would unduly institute and prolong a protective management scheme which is not justified by the facts or the law.

Response 57 - 3: Financial costs of impacts on water rights resulting from designation are difficult to predict and any attempt to do so would be highly speculative. The impacts depend on many variables, including amounts of water available for development, alternative water sources, conversions of water uses, water conservation savings, changes in demands, and many other factors.

One scenario of impacts of designation on Utah communities is described in Professor John Groesbeck's statement included in the transcript from the St. George, Utah wild and scenic river public hearing (see St. George public hearings transcript). While the Bureau of Land Management does not accept all of the assumptions used in Professor Groesbeck's scenario, or his conclusions on impacts that designation of the Arizona portion of the Virgin River would have on Utah, reference to his statement has been incorporated into the final document. The transcript of the St. George public hearing also will be forwarded to the Department of the Interior and Congress.

Response 57 - 4: Any rights reserved to the federal government under a wild and scenic river designation would have priority as of the date of designation, and would not affect "perfected" or certificated water rights in Utah.

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Certificated water right holders in Utah are entitled to use specific amounts of water at specific locations on a priority that is based on their date of application. When a water user with a senior priority date applies for a change in location or type of use, the state water engineer examines the proposal to ensure that no adverse impacts would result to any junior right holders. This examination could result in one of several outcomes, including approval, partial approval, approval with stipulations, or denial.

Should the Utah state water engineer recognize a federal reserved water right in Arizona for a wild and scenic river designation, then such designation may have an impact on subsequent transfers, changes in use, or points of diversion of existing water rights.

"Unperfected Rights" are those that have not been developed, put to beneficial use, or certificated by the Utah state water engineer. These have a priority based on date of application. A federal reserved right resulting from wild and scenic river designation would presumably have a priority based on the date of designation. It is unknown whether "unperfected rights" would be affected. Presumably, any consequences would be determined through either the state water engineer's administrative hearing process or through litigation.

Response 57 - 5: The Bureau of Land Management has no record of any specific plans, future projects, or objectives that would be adversely affected by implementation of the alternatives analyzed in the Virgin River Study Area Legislative Environmental Impact Statement. The significant cumulative impacts of the proposed/recommended action are addressed in the draft and final documents.

Response 57 - 6: The issue of protective management is associated with the management of eligible rivers. The statement is made in chapter 3 (Affected Environment) that "the resources [in this document] are described as they would be managed without protective management." This legislative environmental impact statement evaluates the impacts of implementing various alternatives, and provides recommendations to Congress regarding wild and scenic river suitability.

Response 57 - 7: As stated on page 9 of the draft legislative environmental impact statement, the Bureau of Land Management is required by the Wild and Scenic Rivers Act (P.L. 90-542, Sec 5(d)) to evaluate potential additions to the National Wild and Scenic Rivers System, regardless of any existing designations. Congress has the opportunity to choose from the recommended, or any other alternative. See general response # 1 (Alternatives).

309

57-8

Mr. Moreland Page 3 June 30, 1994

The DLEIS does not provide an accurate or meaningful assessment which would be useful to Congress when it considers BLM's proposal. If Congress were to rely on this document, which chooses to omit analysis of many impacts which would be associated with designation as a study river as well as impacts associated with final designation under the WSRA, it would have no realistic understanding of the true impacts of its doctrion on those who make their living here in Washington County, Utah. These omissions do a disservice to Congress as well as to the people of this County.

Washington County and its citizens would, no doubt, experience the greatest impact if the VR were to be designated under the WSRA. Those impacts have not been adequately or properly addressed in the DLBIS. As a result, any action by BLM toward the preferred alternative arising from the DLBIS would be arbitrary, capricious and not in accord with applicable law. We request that BLM withdraw the DLSIS as it applies to the Virgin River and either prepare a meaningful NBPA document which adequately and bonetly addresses the areas required by law or withdraw the VR from consideration altergether.

Sincerely,

and the second s

Jerry B. Lewis Washington County Commissioner

JBL:cg

Response 57 - 8: The legislative environmental statement is neither a decision document nor an action-implementing document. The present management status of the portion of the Virgin River that crosses Bureau of Land Management administered land in Arizona is authorized by the record of decision for the Arizona Strip District Resource Management Plan (1991) and the subsequent Shivwits Area implementation plan (1992).



Groham County
CHAMBER OF COMMERCE

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191. Thatcher Boulevard + Safford, Arigona 85546 - Phone (602) 428-251

July 5, 1964

Mr. Phil Moreland, Chief Branch of Planning Arizona State Office P O Box 18563 Phoenix, Arizona 85014

Re: Draft - Wild and Scenic Rivers Legislative Environmental Impact Statement

Thank you for the opportunity to respond to the Wild and Scenic Rivers Legislutive Environmental Impact Statement.

Secause of the private sector represented by the Graham County Chamber of Commerce, we will limit our response to those rivers and atreams located in our area. We have followed the Wild and Scenic Rivers issue over the past year and have studied the various "alternatives" defined in the Draft.

We support the "No Action" Alternative for the following areas:
Lower San Francisco River;
Gita River (Gita Box);
Bonita Creek;
Aravatoa Creek

Cur comments will focus on these areas:

64-1

LOYIER SAN FRANCISCO RIVER: The proposed 6.4 miles, which lies south of the Morenci Mining District in Greenies County, was studied jointly by the Forest Service and BLM in the early 1980's. At that time it was determined unsultable due to impacts on opportunities for flood control, water storage, mineral and geothermal development and lack of public support,. Those conditions still exist and are more important today than they were in 1982.

Mining is very important to the economic base in Graham County. Phelps Dodge mine located in Greenies County, employees 2,400 workers - one third of the miners five in Graham County and the other two thirds use the retail and service facilities available in Graham County. Additional mine development is being considered in Graham County.

THE BUREAU MUST INCLUDE THE LONG TERM IMPACT ON EMPLOYMENT LEVELS OF MINING AND RETAIL SALES AND SERVICES.

"THE GRAND COMBINATION"

Response 64 - 1: The recommended alternative makes allowances for additional power lines and acknowledges impacts of mine operations and expansion on the scenic values of the study area. The Wild and Scenic Rivers Act does not empower the federal government to regulate uses on private lands. The recommended alternative is not expected to impact operation and future expansion of the Phelps Dodge mine at Morenci.

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64-4

The proposal calls for acquisition of 590 acres of adjacent private lands.

Over 93% of Graham County is stready controlled by the public sector, the EIS falls to identify current economic contribution to area economy and the long term impact of additional public lands to that economy.

THE BUREAU REEDS TO STUDY THE LONG TERM ECONOMIC IMPACT CREATED THROUGH THE LOSS OF ADDITIONAL PRIVAYE LANDS.

GILA RIVER (GILA BOX): The proposed 28.5 miles lies directly between the Morenci Mining District in Greenies County and the Safford Mining District in Graham County. The Sanchez mine is acheduled to open in 1995 and expected to create 210 jobs for the next twenty years with an average annual income of over \$30,000 per employee. Phaipe Dodge, in Morenci, presently employee 2,400 people and are planning to expand that site. They also intend to open a mine in Graham County which is projected to employe an additional 800 new people with an average annual of \$35,000 per employee. Designations for "Wild and Scenic" also include visual impacts. Mining obviously has a visual impact. If these planned mines are not allowed to open or operate because of a visual impact on the "rivers", what will be the economic impact on the communities involved?

THE BUREAU MUST ASSURE GRAHAM AND GREENLEE COUNTY RESIDENTS THAT THE DESIGNATION WILL NOT IMPACT THE SCHEDULED DEVELOPMENT OF MINING IN FUTURE YEARS.

Information concerning additional permanent congressional protection for free flowing water in the Gila River is unclear. The waters are now managed by a Federally appointed commissioner and the entitlement of various users was determined under the 1935 Globe Equity Decree. Agriculture is an important component to our economic base and represents 30% of our economy and holds significant water rights.

THE BUREAU NEEDS TO ANALYZE THE ECONOMIC IMPACT IF THE DESIGNATION IMPACTS THE PRESENT AGRICULTURAL ALLOTMENT AND GUARANTEE THE WATER RIGHTS AS ALLOTED UNDER THE 1935 GLOBE EQUITY DECREE.

This section of the Gils River serves as a popular recreation area. It has traditionally been a popular area for Graham and Greenles residents and more recently has attracted people from around the state and nation.

64-5

THE BUREAU NEEDS TO STUDT THE IMPACT OF THE TRADITIONAL USE OF THE AREA AND CONSIDER THE ECONOMIC LOSSES IN RETAIL AND SERVICE BUSINESS THROUGH THE LOSS OF THE RECREATION INDUSTRY

Response 64 - 2: Please see general response # 6 (Land Acquisition).

Response 64 - 3: Please refer to general response # 12 (Visual Impacts).

Response 64 - 4: Please refer to general responses # 4 (Federal and State Water Rights) and # 5 (Instream Flow Water Rights).

Response 64 - 5: Please refer to general response #2 (Economic Impacts).

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64-6

The proposal recommends acquiring approximately 500 additional acres of private land. With only about 6% private land in Graham County, loss of acres places an even larger role on private sector to carry the burden of supporting state and local government and education. PILT is received in lieu of property taxes from public lands but that payment formula has not been adjusted since 1978.

THE BUREAU NEEDS TO STUDY THE LONG TERM ECONOMIC IMPACT SHOULD DESIGNATION OCCUR AND ADDITIONAL PRIVATE LANDS BE REMOVED FROM THE PROPERTY TAX ROLLS

BONITA CREEK: The proposed 6.1 miles lies between the mining deposits identified earlier in our comments. The proposal also acquires 970 screa of private land. Threats of the proposal include mining, grazing, and recreation uses. Designations for "wild end aconic" also include visual impacts. Mining obviously has a visual impact, if these planned mines are not allowed to open or operate because of a visual impact on the "Rivers", what will be the economic impact on the communities involved?

AGAIN THE LONG TERM ECONOMIC IMPACT NEEDS TO BE INCLUDED IN THE ANALYSIS - INCLUDING MINING, RANCHING, AGRICULTURE, RECREATION, RETAIL AND SERVICE BUSINESSES.

64-8 Bonite Creek is also the major source of domestic water for Grahem County. The water source facility owned by the Chy of Safford provides 65% of the total 27,000 population.

THE BUREAU MUST GUARANTEE ADEQUATE WATER FOR DOMESTIC USE TODAY AND FOR FUTURE EXPANSION.

ARAVAIPA CREEK: The proposal, which includes ten miles of Aravaipa Creek will impact grazing altotments, recreation and a small community called Klondyke.

THE BUREAU NEEDS TO ASSESS THE LONG TERM ECONOMIC IMPACT INCLUDING RANCHING, RECREATION AND RETAIL BUSINESS.

The "NO ACTION" alternatives for the Lower San Francisco River, the Gita River (Gila Box), Bonits Creek and Aravaipa Creek are based on the "Conclusions" identified in the Draft. It has no direct adverse impact in any of the areas identified in the Draft. The conclusions are found: on the acenic values (page 109), on the recreational values (page 110), geologic values (page 110), remarkable fish and wildlife habitat and aquatic habitat values (page 112), cultural and historic values (page 112), hydrologic values (page 112), mineral developments (page 113).

Response 64 - 6: Please see response 64 - 2, above.

Response 64 - 7: The entire Bonita Creek Wild and Scenic River Study Area is contained within the Gila Box Riparian National Conservation Area established by the Arizona Desert Wilderness Act (P.L. 101-628, 1990). The Act withdrew the entire area from mineral entry. No additional impacts from designation as a wild and scenic river are anticipated.

Response 64 - 8: The recommended alternative reflects your concerns over the Safford domestic water supply in its recommendation that the wild and scenic river segment terminate at Lee Trail upstream of the city water facility.

in reviewing the "no action" aftern areas, it is clear that they can be p management without the additions on our economy and traditional las	Property managed under present BLM
Respectfully, Graham County Chamber of Comm	Steve Early
Bill Facus Bill Facus Bill Facus	Steve Eady, Vice President Tim Graham, Member
Tom Johnson, Mamber	Eugene Ho, Member
Janes Curito, Momber	Chery Berg, Member
Jenet Staphens, Mamber	

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819 MELCOY LIVE, BISSEE, ARCONA 85603-308

FAX 432-8426

July 7, 1994

Mr. Phil Moreland, Chief Branch of Planning, Environment, Lands and Recreation Arizona State Office Bureau of Land Management 3707 North 7th Street P. O. Box 16563 Phoenix, Arizona 85014

Re: The Arizona Wild and Scenic Rivers Legislative Environmental Impact Statement (LEIS)

Dear Mr. Moreland:

Fursuant to the above referenced LEIS, I am sending you this correspondence. The LEIS analyzes various alternatives, including a proposed action determining 13 river study areas as suitable and recommending that Congress include them in the Mational Wild and Scenic River System. Within the confines of Cochise County, the San Pedro River and Hot Springs Canyon are being considered for such designation. My comments will specifically address these two areas and will attempt to summarize the alternatives discussed within the LEIS and their related impacts to facilitate understanding on the part of those individuals I have copied on this letter.

First of all, the overall purpose of the National Wild and Scenic Rivers Act (Public Law 90-542) enacted October 2, 1968, is to preserve in "free-flowing condition" and to protect for the "benefit and enjoyment of present and future generations...cartain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values". In response to this Act, the subject LBIS has proposed to identify Arizona rivers with outstandingly remarkable values to (1) determine suitability and recommend designation by Congress for inclusion in the National Wild and Scenic Rivers System, and [2] recommend the remaining rivers as noneutrable for designation.

Waterways in the 19 Study Areas identified in the LBIS were assigned tentative classifications for protective management as Wild, Scenic, or Recreational on the basis of criteria in the Wild and Scenic Rivers Act. Said criteria are as follows:

- Wild river areas Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and water unpolluted. These represent vestiges of primitive America.
- Scenic river areas Those rivers or sections of rivers that
 are free of impoundments, with shorelines or watersheds still
 largely primitive and shorelines largely undeveloped, but
 accessible in places by roads.
- Recreational river areas Those fivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

Hot Springs Canyon has been proposed for designation due to outstandingly remarkable fish and wildlife habitat values whereas the San Fedro River has been proposed for designation due to outstandingly remarkable scenic, recreation, fish and wildlife habitat, cultural and historic, hydrologic and paleontologic values.

The LEIS has provided an overall suitability assessment summary of these two river study areas as follows:

The Hot Springs Canyon river segment proposed for designation is not nationally significant, there are no threats to free-flowing values or outstandingly remarkable values, and no additional protective management is needed for fish and wildlife values. If the river segment is not designated under the Wild and Scenic Rivers Act, it would be managed as part of the Swamp Springs/hot Springs Watershed Ares of Critical Environmental Concern (ACEC). If the river segment was designated however, there would be little, if any change from current management. Under the Proposed Alternative Action within the LEIS, the BLM is recommending the river segment (6 miles) as non-suitable for designation.

The San Pedro River is a nationally prominent riparian ecosystem and ranks as the top area in the western hemisphere for paleontological sites associated with early mankind. Goundwater depletion on adjacent lands and in Mexico could adversely affact surface flows. Under the Proposed Alternative Action within the LEIS, the BLM is recommending two river segments (44 miles) as multible for designation. A portion of one segment (2 miles) of private land is recommended as non-suitable. This segment lies between the southern and northern sections of the San Pedro Riparian National Conservation Area. The segment was found non-suitable because a decision was made not to acquire easements for access.

I would now like to summarize those specific management alternatives suggested under the Proposed Alternative Action for the two rivers as set forth within the LEIS. The summary for each of these rivers will be followed by a staff recommendation from this department.

The second of th

HOT SPRINGS CANYON WILD AND SCENIC RIVER STUDY ARRA

Specific portions of the Hot Springs Canyon River were identified in the Safford District Resource Management Flam (1993) as eligible for further study in the Wild and Scenic River evaluation process. The purpose of the LEIS was to determine the suitability for recommending these portions of Hot Springs Canyon to Congress for inclusion in the National Wild and Scenic Rivers System.

The Hot Springs Canyon Wild and Scenic River Study Area is located about 30 miles north of Benson. The segment under consideration is approximately six miles long with one mile flowing through state and private land. This segment was considered eligible for wild and scenic river designation in the Safford District Resource Management Flan because it is free-flowing and possesses outstandingly remarkable fish and wildlife values. It is tentatively classified as Wild because the shoreline is primitive and undeveloped and there are no roads or other developments in the corridor.

Most of the land is in public ownership although the Arizona Nature Conservancy and the state own short reaches of the canyon bottom. Not Springs is a perennial stream.

The Hot Springs Canyon study area will be managed under the provisions of the Mulashoe Ecosystem Menagement Plan whether or not it is designated as a wild and scenic river.

Proposed Action

The Proposed Action Alternative determines the entire Hot Springs Canyon study area to be nonsuitable and does not recommend the study area for designation.

Wild and Scenic River management actions

The Proposed Action determines the Hot Springs Canyon study area to be nonsuitable. No management actions associated with Wild and Scenic River designation would apply.

Ongoing management actions

Hot Springs Canyon study area will remain open to mineral entry. Plans of operations would be required for all mining activities above the level of casual use. A no surface occupancy stipulation would be required for mineral lessing activities in the riparian zone of the study.

- The study area will be managed for dispersed recreation. This
 includes hiking, hunting, picnicking, bird watching and
 camping.
- The area is designated as a Visual Resource Management Class II zone. The objective of this class is to maintain the existing character of the landscape.
- The area is closed to woodcutting.
- The riperian area of Hot Springs Canyon is closed to offhighway vehicle use.
- Establish the Gila chub as a priority species and manage habitat to maintain or increase population levels.
- Establish the gray hawk as a priority spacies and manage habitat to maintain or increase population levels.
- Manage riparian vegetation in accordance with the Bureau of Land Management goal of having 75 percent of the riparian areas in functional condition and in an advanced ecological status.
- Stream flow will be monitored on a monthly basis to protect the existing instream flow water right and advance it to the certificate stage.
- Hot Springs Canyon will be avaluated for designation as a Unique Water under state law.
- Livestock use of the study area will follow the grazing prescription developed in the Muleshoe Ecosystem Flan for Swamp Springs-Rot Springs Area of Critical Environmental Concern. Livestock will either be excluded from the 160 acre riparian zone associated with stream segment or managed in a manner that protects the riparian and other resource values.

Staff Commants

The Proposed Action Alternative as suggested within the LEIS is to <u>not</u> designate Not Springs Canyon under the Wild and Scenic River Act. As previously mentioned, this recommendation is based on the following factors:

- the segment is not nationally significant;
- there are no threats to free-flowing values or outstandingly remarkable values;
- no additional protective management is needed for fish and wildlife values;

- if not designated, the segment would be managed as part of the Swamp Springs/Not Springs Watershed ACEC; and
- if designated, there would be little if any change from current management.

Based upon the above justification and the ongoing management actions that will take place in the study area should non-designation occur, Flanning Department staff concurs with the Proposed Action Alternative to <a href="https://doi.org/10.1007/journals-take-1-10.1007/

BAN PEORO NILD AND SCRNIC RIVER STUDY AREA

Spacific portions of the San Pedro River were identified in the Safford District Resource Management Plan (1993) as eligible for further study in the Wiid and Scenic River evaluation process. The purpose of this action is to determine the suitability for recommending these portions of the San Pedro River to Congress for inclusion in the National Wild and Scenic Rivers System.

The San Pedro Wild and Scenic Study Area is ten miles east of Siarra Vista. Specifically, it is the segment of the river contained in the San Pedro Riparian National Conservation Area between the Mexican border and St. David. The study area contains 46 river miles, 38.3 of which are managed by the Bureau of Land Management, and a strip of land that extends out 0.25 miles from the shoreline on either side.

Public lands in the study area are managed by the Tucson Resource Area under the San Pedro River Riparian Management Plan (1989) and the Sefford District Resource Hanagement Plan (1993). The remainder of the study area is privately owned. There are public, private, and state-owned lands adjacent to the study area.

The San Pedro River was determined to be eligible for inclusion in the Wild and Scenic Rivers System by the Bureau of Land Management because the river is free-flowing and has outstandingly remarkable scenic, recreation, fish and wildlife habitat, hydrologic, and cultural values. The San Pedro River study area suitability assessment found the single 46-mile segment suitable as Becreational.

Although the study area has been used for farming, ranching, mining, and recreational activities, it generally retains its natural appearance.

Proposed Action

The Proposed Action creates two segments consistent with the southern and northern sections of the San Pedro River Riparian National Conservation Area. Both segment are determined to be suitable and recommended for designation as Recreational.

The southern segment is three miles long and consists of two miles of public land and one mile of private land. The northern segment is 41 miles in length, consisting of 36.3 miles of public land and 4.7 miles of private land. A third segment, a two-mile stretch of private land between the southern and northern sections of the San Pedro Riparian Mational Conservation Area (essentially two miles north of where Highway 92 crosses over the San Pedro River in Palomines) is determined to be nonsuitable and is not recommended for designation.

Wild and Scenic River management actions

Wild and scenic river designation would require certain management actions to be initiated. In accordance with the Bureau of Land Management Wild and Scenic River Manual the following would occur in the implementation of the Proposed Action for the two Wild segments of the San Fedro Study Area. Where the wild and scenic river management actions would overlap ongoing management actions, the more stringent would apply.

- Water quality would be maintained or improved to meet state standards.
- New hydroelectric power facilities would be prohibited.
- Esisting low dams, diversion works, riprap, and other minor structures would be permitted.
- $M_{\rm c}/M_{\rm b} \approx -$ New waterway structures could be allowed.
 - Existing parallel roads would be maintained.
 - Motorized travel is permitted.
 - Interpretive centers, administrative beadquarters, compgrounds, and picnic areas could be established.
 - Recreation use would be encouraged but public use and sccess may be regulated and distributed to protect and enhance recreational river values.
 - New minor structures for fish and wildlife habitat protection would be permitted.
 - New rights-of-ways, transmission lines, natural gas lines, water lines would be discouraged. Where no reasonable alternate location exists, additional or new facilities would be restricted to existing rights-of-way.
 - Instream flow would be quantified. An assessment was developed in order to secure instream flows associated with protecting the outstandingly remarkable values.

Control of the contro

Ongoing management actions

The ongoing management actions listed below summarize selected provisions of the San Pedro Riparian National Conservation Area Management Flam and the Safford District Resource Management Plan.

- Efforts would be made to acquire nonfederal lands on a willing seller-willing buyer basis or through exchange.
- Land use authorizations (rights-of-way, leases, temporary use permits) would be considered on a case-by-case basis.
- Off-highway vehicle use is limited to designated roads and trails.
- Length of stay would be limited to seven days.
- Up to four interpretive displays would be developed.
- Up to four foot/equestrian trails would be developed.
- Up to three dedicated outdoor environmental education field study areas of five to ten acres each would be developed. These facilities will include shade shelters; tables, signs, and small perking areas. Access to and use of these sites would be restricted.
- Up to two campgrounds (San Pedro Ranch house/30-50 units; Hereford/15-30 units) would be developed.
- Up to six small picnic sites and up to three group picnic sites would be developed.
- Trapping would be prohibited except where a need is determined through consultation with the Arizona Game and Fish Department and the Animal and Plant Health Inspection Service.
- Up to ten miles of fence would be constructed to protect riparian areas, according to the Arizona Riparian-Wetland Area Management Strategy.
- Native trees (seedlings and poles) would be planted along the riparian corridor and other areas.
- Wildlife waters would be constructed in the drier upland portion of the area.
- Revegetation of stream banks would be completed where appropriate.
- Proposals for activities that could result in increased use or surface disturbance will be reviewed by a cultural resource specialist.

78-1

- In most cases, a cultural resource field inventory of the potentially affected area will be completed.
- If sites are determined eligible for the National Register of Historic Places, in consultation with the State Historic Preservation Officer, they will be avoided by the proposed activity.
- If avoidance is not pessible, impacts will be mitigated through a data recovery program developed in consultation with tha State Historic Preservation Officer.
- Unnecessary wells would be closed and capped.
- Dikes and berms along the east and west sides of the sbandoned farm fields would be removed and preexisting drainages would be reestablished.
- Erosion control structures would be built only as needed to protect other resources and watershed values.

Staff Comments

In reviewing the LEIS for the San Pedro River Study Area, there are three alternatives discussed, the Proposed Action (which has just been summarized), the All Suitable Action and the No Action. The essantial difference between the Proposed Action and the All Suitable Action is that the Proposed Action would exclude the 2 mile river segment north of State Highway 92 since it is in private ownership whereas the All Suitable Action would include this 2 mile segment for designation under the Wild and Scenic Rivers Act.

The No Action Alternative determines the San Fedro River to be not suitable and does not recommend designation for the entire San Pedro Wild and Scenic River Study Area. Implementation of the No Action Alternative would rescind any protective status associated with the eligibility findings, and place the river area under applicable multiple use management prescriptions defined in the San Pedro Riparian Management Plan.

Planning Staff contends that the San Pedro River Study Area merits specific protection status under the Wild and Scenic Rivers Act. We therefore concur with the Proposed Alternative Action to designate two segments of the San Pedro River under the Wild and Scenic Rivers Act. We would, however, encourage the Bureau of Land Management to work with the private property owners within the 2 mile river segment that would be excluded for designation under the Proposed Alternative Action to establish some suitable level of protection of the San Pedro River in this specific area.

I would like to thank the Bureau for allowing the County to respond to the draft LEIS. I would ask that we be maintained on all

mailing lists so that we will be appraised of any future dispositions in this regard.

Sincerely,

James E. Viahovich Planning Director

cc: /Judy Anderson, Senior Planner
John Hackinnon, Deputy County Attorney
Board of Supervisors
Comprehensive Plan Update Committee

Response 78 - 1: If Congress acts to designate these segments of the San Pedro River to the National Wild and Scenic Rivers System, the Bureau of Land Management would be required to develop a river management plan. This would involve public participation throughout the process.

July 7, 1994

MR. PHIL MORELAND, Chief Branch of Planning Arizona State Office P.O. Box 16561 Phoenix, A2 85014

Dear Mr. Moreland:

Re. Wild and Scenic Rivers Suitability Assessment

Dear Mr. Moreland:

This letter is submitted to formally comment on the Bureau's Wild and Scenic Rivers Legislative and Environmental Impact Statement. The Community and Thatcher Town Council will focus our concerns on the lower San Francisco River, Gila River, Bonita Creek and Aravaipa Creek. First, the San Francisco River runs just south of the Copper Mining District in Greenlee County, possibly affecting the largest producing copper mine in the United States with about 2,400 workers. Although this mine lies in Greenlee County, the size of this operation significantly contributes to Grahem County's economy with about one third (1/3) of these workers coming from our area. Therefore, it is our desire that any environmental review will have a thorough analyses on long term suployment levels at this mining operation, including the rippling effect that will further result on secondary services in the retail and services sectors.

B6-1

There are a number of other possible activities, including; geothermal energy; recreational activities such as sand rails; flood control structures to better manage these waters for agriculture needs and reduce damage to public and private property; and water storage facilities to address the drinking water needs of a growing valley. These factors need to be folded into any review and environmental impact study of these waters because they are so vital to this area.

TOWN OF THATCHER P.O. BOX 670 + 1130 N. COLLEGE AVENUE + THATCHER, AZ 85552 + (602) 428-2290 + FAX (802) 428-7081 Response 86 - 1: Please refer to general response #2 (Economic Impacts).

designations.

86-2

86-3

The Bonita Creek analysis appears to complicate the primary water source facilities owned by the City of Safford. Safford provides domestic water to Thatcher and I's told about 65 to our valley. Any limitations or threats on this essential commodity would obviously have terrible ramifications and this includes not being able to explore and develop new water sources as our area grows.

Secondly, the Gila River which runs through our valley carrying the water so vital for agricultural and ranching purposes, which industries represent a significant portion of our economy in Graham

industries represent a significant portion of our economy in Graham County. In addition, impact on possibly new mining concerns, recreational activities, as well as the possibility of geothermal resources will be negatively impacted by this designation, thereby further hurting our rural economy by limiting these valuable resources from our use. It is our desire that the federal government begin to recognize the detrimental impacts that are

being caused to communities by the limitations imposed by any designation of rivers to the Wild and Scenic Rivers Program.

Finally, the Aravaipa Creek would impact existing ranching concerns and the community of Klondyke located in this vicinity. There are also important recreational opportunities in this area with Aravaipa Canyon already preserving a significant portion of land for people. The question arises than why would the federal government want to further restrict the peoples ability to use the resources of this area, as well as the other proposed areas being considered for Wild and Scenic River designation.

These proposals call for the federal government to acquire additional lands and to further limit the use of some 17,000 acres of public and private lands. As I believe has been shown and others have made more detailed comments, these designations will have a significant detrimental impact on our existing economy, as well as greatly hinder future growth, causing undue hardship on the citizens of Thatcher, as well as those in other communities of this area. For these reasons, the Thatcher Town Council and I would respectfully request that you and your staff reasonably identify these impacts and consider the far-reaching social and economic impacts to our area as you deliberate on these proposed

Barry Innes Mayor of Thatcher Response 86 - 2: Please refer to general response #1 (Alternatives).

Response 86 - 3: Please refer to general response # 4 (Federal and State Water Rights).

Response 86 - 4: Please see response 86 - 1, above.

Response 86 - 5: Please refer to general response # 6 (Land Acquisition).

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86-5

ARTHUR N. LEE CHAIRMAN OF THE BUARD F. O. BOX HE + EAGAR, AZ SINU

JOE SHORLEY, JR., PERSON OF THE MOUND CHEME SUB-OSSINE P. O. BOX 1913 - CHEME, AZ 1669 AMBROSE SHEPHERD

AMBROSE SHEPHERD
MEMBROSE SHEPHERD
GANADO SUB-OFFICE
F. C. BOX IN 1 CANADO, AZ GANA

BOARD OF SUPERVISORS OF APACHE COUNTY

> P. O. BOX 428 ST. JOHNS, ARIZONA 85846 TELEPHONE 337-4364



CLABENCE A. BIGSLOW, MANAGER - CLEEN ST. 1000H, AZ 2019

MIGURAN BOARD RESETING
FREST AND SHIED MONDAY

July 7, 1994

Mr. Phil Moreland, Chief Branch of Planning Bureau of Land Management Arizona State Office P.O. Box 16563 Phoenix, AZ 85014

Dear Mr. Moreland:

We are writing in support of, and adopt as our own, Graham County's ettached comments regarding the proposed designation of several riparian areas as Wild, Scenic, or Recreational Rivers. In addition, Apache County offers the following observations.

87-1

321

- 1. The courts clearly state that fix a project of broad geographical scope, such as this one, a separate EIS must be performed fix each proposed action (State of California v. Block, 1982).
 On these grounds, we request that the current EIS be scrapped and that new ones be done for each proposed Wild and Scenic River dargnation.
- 2. The EIS does not adequately address the economic impact of your proposed designations. Further, it fails to consider the possible taking of people's property and water rights without just compensation, which would be a violation of the 5th amendment of the Constitution. We recommend that this EIS be rejected for these reasons, and that new EIS more comprehensively examine these impacts:
- 87-3

87-2

 We extend the socio-economic impact arguments of Graham County to all waters proposed for Wild and Secure designation, because of the serious economic and social consequences each would foster.

We wrge that you reexamine this project, and carefully consider each site individually in light of the significant disruption their designation would cause in local economies and the social stability of affected Counties.

Thank you for this opportunity to comment. Your serious consideration of our objections to the Draft EIS is appreciated.

Sincerely

Arthur N. Lee, Chair Board of Supervisors of Apache County Response 87 - 1: The river appendix volume contains separate environmental impact statements for each of the 20 eligible rivers.

Response 87 - 2: Please refer to general responses # 2 (Economic Impacts) and 4 (Federal and State Water Rights). None of the wild and scenic river action alternatives propose acquiring land or water rights.

Response 87 - 3: Please refer to general response # 2 (Economic Impacts).

GRAHAM COUNTY BOARD OF SUPERVISORS

GRAHAM COUNTY COURTHOUSE . 800 MAIN STREET . PHONE 428-3250 SAFFORD, ARIZONA 85546

DELBERT HOUSEHOLDER, CHAIRMAN TERRY J. BINGHAM, HEHBER HAYNES MOORE, MEHBER

JOE CARTER, COUNTY MANAGER BARBARA FELIX, CLERK

June 29, 1994

Mr. Phil Noreland, Chief Branch of Planning Arizona State Office PO Box 16563 Phoenix, Az B5014

RE: Wild and Scenic Rivers Suitability Assessment

We, in a letter dated May 23, 1994, submitted formal comments to you on the Dureau's Wild and Scenic Rivers Legislative and Environmental Impact Statement. Having reviewed procesed segments in Graham and Greenles Counties more closely we thought it important to submit supplemental comments and questions saaking clarification. More specifically our comments will focus on the lower San Francisco River, Gila River (Gila Box), Sonita Creek and Araviapa Creek.

LOWER SAN FRANCISCO RIVER - The proposed 6.4 miles lies just to the south of the Copper Mountain Mining District in Graham County. This river was studied jointly by the Forest Service and BLM in the early 1988's. At that time it was determined unsuitable due to tack of public support, impacts on apportunities for flood control structures, water storage and impacts on mineral and geothermal development. Each of these conditions are more important to us today than in 1982. The study area lies just south of the Copper Mountain Mining District, Mining is a greater part of our economic base than it was twelve years ago. It is the largest producing mine in the United States and employs 2,400 workers at an average annual salary of \$34,700 dollars. Even though the mine is located in Greenlee County approximately one third of that work force lives in Graham County and commutes daily. The remaining workers shop in the Graham County trades and services centers. They contribute significant dollars to that sector of our economic base annually. The draft EIS alludes to threats and adverse impacts created by mining operations even though those operations are on adjacent private lands.

THE BUREAU MUST PROVIDE AN AMALYSIS OF THE LONG TERM IMPACT ON EMPLOTMENT LEVELS AT THE MINE INCLUDING THE DOMINO EFFECT IN TERMS OF MEGATIVE IMPACT ON RETAIL TRADES, SALES AND SERVICES SHOULD DESIGNATION OCCUR.

The proposal also calls for acquisition of about five number ninety (590) acres

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

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GRAHAM COUNTY ARIZONA FAX NO. 6024285951

page 2

of adjacent private lands. The Bureau in its draft EIS failed to complete an analysis and identify that land's current economic contribution to area economies and the long term impact by becoming public lands on those economies and property taxation losses which support state/local governments and education.

THE BUREAU MUST PROVIDE AN ANALYSIS OF THE LONG TERM IMPACT SHOULD DESIGNATION OCCUR AND THOSE PRIVATE LANDS BE REMOVED FROM PROPERTY TAX ROLLS AND ECONOMIC

The draft also alludes to threats and adverse impacts on future power transmission the draft also ellipses to chreats and doverse impacts on rature power transmission lines which support the high tech mining operations and are crucial to cost effective mining operations. The draft EIS anticipates that the mining operations will need additional power. It also indicates that new power lines will be routed through the existing corridor. What authoritive basis lead the Sureau to believe that the existing corridor would accommodate future power transmission lines? If the existing corridor proves to be inadequate for future transmission line needs the Bureau must identify cost for alternative routes should designation occur and the economic impact of that cost.

IF THERE IS NO AUTHORITIVE BASIS FOR THIS STATEMENT THE BUREAU MUST PROVIDE AN ANALYSIS TO SUPPORT THAT CONCLUSION. THE ANALYSIS MUST BE FOR A PERIOD MORE REFLECTIVE OF THE MINES FUTURE LIFE AS OPPOSED TO THE IMMEDIATE TMENTY YEAR PERIOD.

The draft EIS also focuses on geothermal development, recreational activity including sand rails, flood control structures and water storage. Geothermal amergy development research continues and we are opposed to restrictions which may impair such opportunities for an alternative energy source. Such development could occur and contribute significantly to our economy. Sand rail recreation has become increasingly popular in the Graham/Greenlee County area. This recreational activity attracts folks from throughout southeastern Amizona. Bureau failed to provide an analysis of the economic contribution of this sureal falses to provide an analysis of the economic contribution of any recreational activity and negative impact on the retail trades, sales and services component of our economic base by limiting such use. The Bureau further alludes to no activity within the next twenty years with respect to floods control structures. The Graham/Greenlee County area remains subject to frequent major flood events, which affect our economies and traditional uses of both private and traditional trades to the flood events to the flood events county along the provide wars. and public lands. In-fact such flood events occur almost event three years. Events for the last thirty years are well documented in terms of recovery cost and economic losses. The financial impact for the thirty year period through January 1993 has exceeded three hundred million (\$200,000,000) dollars. Resolution of flood control issues and water storage continues to be a high priority for Graham/Greenlee County elected officials and community leaders along with their counterparts in southwest New Mexico.

THE BUREAU MUST PROVIDE AN ANALYSIS OF THE LONG TERM ECONOMIC IMPACT SHOULD DESIGNATION OCCUR IN TERMS OF LIMITING OR RESTRICTING OPPORTUNITIES WHICH EXIST AS WE ATTEMPT TO RESOLVE THIS CONCERN.

SILA RIVER (GILA BOX) - The proposed 26.6 miles lies between two large copper mining districts. Those are the Copper Mountain Mining District in Greenlee County which was addressed in our comments on the lower San Francisco River and the Sanchez, San Juan, Dos Pobres and Lonestar Mining District in Graham County. While the study area is not in any established gineral district the draft EIS does identify mineral deposits immediately beyond the southwestern terminus of the study area. As reported in the draft document the Sanchez mine is schaduled to begin operations in 1995 creating two hundred (200) plus jobs for the next

twenty years at an average annual salary of \$30,000 dollars. Phelps Dodge has announced its intent to move forward with development of properties in Graham County. They hope to be operational within the next five years according to their Chairman of the Board. Phelos Bodge enticipates approximately six hundred (600) new jobs will be created at their mine at an average annual salary of \$35,000

SHOULD THIS DESIGNATION OCCUR THE BUREAU MUST ASSURE AREA CITIZENS THAT IT WILL NOT IMPACT THE SCHEDULED DEVELOPMENT OF THOSE PROPERTIES AND THEIR OPERATION IN THE YEARS TO COME. IF-IN-FACT THERE MAY BE A THREATENED IMPACT THE BUREAU MUST INCLUDE AN ANALYSIS OF THE ANTICIPATED LONG TERM ECONOMIC LOSS.

The designation alludes to additional permanent congressional protection of free flowing waters in the Gila River. While flows on the Gila River fluctuate dramatically from minimal, to moderate to extreme levels during the frequent flood events the swallable water resources in any given year do not meet current entitlements of various users as determined under the 1935 Globe Equity Decree. These waters are managed by a Federally appointed commissioner. Agriculture and others entitled to portions of this resource must annually supplement their proportioned share by pumping ground water. The most single significant non-government component of Graham County's economic base is agriculture. It represents just over thirty percent of the countywide economy. It also holds significant water rights, although it has not received in any given year its full

THE SUREAU FAILED TO PROVIDE AN ANALYSIS OF THE ECONOMIC IMPACT IF DESIGNATION RESULTED IN REQUIRING MINIMAL IN-STREAM FLOWS. SUCH ACTION MOULD PRIMARILY AFFECT THE UPPER CILA RIVER USERS AND THEIR COUNTERPARTS IN THE MATER SHED AREA IN SOUTHNESTERN NEW MEXICO, MORE SO THAN DOWN STREAM BELOW THE COOLIDGE DAM.

This section of the river, in spite of designation as a Riparian National Conservation Area, continues to be a popular recreational area. Racreational activities range from individual family outings to large gatherings. The area has traditionally been most popular for Graham/Greenlee area citizens. It has also been an attraction for citizens from throughout southeastern Arizona for a wide variety of recreational purposes.

THE COREAU FAILED TO PROVIDE AN ANALYSIS OF THE IMPACY IN TERMS OF TRADITIONAL USES AND ECONOMIC LOSSES IN THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF CHUR ECONOMIC BASE THROUGH LIMITIMS OR LOSS OF EXISTING RECREATIONAL USES.

The proposal also recommends acquiring about five hundred (500) acres of private lands. Graham County consists of a landmass of just over 4,600 square miles. About six percent of that landmass is private and must been the burden of property taxation in support of state/local governments and education. While public lands pay PILT in life of property taxation the payment formula has not been adjusted since its creation in 1976. The Bureau failed to complete an analysis and identify the land's current economic contribution to the area.

THE BUREAU RUST PROVIDE AN ANALYSIS OF THE LONG TERM IMPACT SHOULD DESIGNATION OCCUR AND THOSE PRIVATE LANDS BE REMOVED FROM PROPERTY TAX ROLLS AND ECONOMIC LOSS DATA.

The draft EIS indicates that portions of eight livestock grazing allotments are in the study area. That portion of the allotments actually in the study area ranges from one percent to fifty one percent. The proposed pien calls for removal of livestock from the upper end of the study area and, on a limited basis, down stream to the end of the study area. The Bureau failed to provide an economic

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P. 05

page 4

analysis of the impact on the manching community from this proposed action and the domino effect on the retail trades, sales and services industry. Unlike some areas in the western United States, Graham County ranching operations are small family businesses. Ranching has provided for the accommic well being of those families for many years.

THE BUREAU MUST PROVIDE AN ANALYSIS OF THE LONG TERM IMPACT ON THESE BUSINESSES INCLUDING THE DOWING EFFECT ON THE RETAIL TRADES, SALES AND SERVICES COMPONENT OF OUR ECCNOMIC BASE.

The draft EIS also focuses on geothermal resources and in-fact the Gillard Hot Springs is the hottest spring in the state with an average surface temperature of 180°. It further indicates that this resource could be used as a heat source. It appears that the Gillard Hot Spring geothermal resource has the highest development potential use even though geothermal resources exist at three of the five sagments being considered in the Graham/Greenlee area.

WE URGE THE BUREAU TO COMSIDER THIS POTENTIAL ALTERNATIVE EMERGY SOURCE AND NOT RECOMMEND ANY ACTION WHICH WILL LIMIT OR PROMIBIT SUCH DEVELOPMENT OPPORTUNITIES.

BONITA CREEK - The proposed 8.1 miles lies between the two major mining deposits identified in our comments on the lower San Francisco and Gila river segments.
This proposal also calls for the acquiring of nine hundred seventy (970) acres of private land. Again it also impacts grazing allotments, recreational uses, utility facilities including the primary water source facility owned by the City of Safford, Safford provides domestic water for about sixty five (65%) percent of the total county population of 25,000. Threats to the proposal include mining, grazing, recreational uses, transportation corridors and utilities.

THE BUREAU MUST PROVIDE AN ANALYSIS OF THE LONG TERM ECONOMIC IMPACT OF DESIGNATION MERE IT TO OCCUR. THAY ANALYSIS MUST FOCUS ON MINING EMPLOYMENT LEVELS, ECONOMIC WELL BEING OF RANCHING FAMILIES. IMPACTS ON SAFFORD'S PRIMARY DOMESTIC NATER SOURCE, RECREATION, UTILITY CORRIDORS AND THE DOMING EFFECT ON OUR RETAIL TRADES.

ARAVAIPA CREEK - The proposal calls for all 10 miles of Aravaipa Creek. This proposal will impact four grazing allotments, recreational opportunities and the entire economic base for the small klondyke community located about sixty miles from the County Seat.

AGAIN THE BUREAU MUST PROVIDE AM AMALYSTS ON THE LONG TERM IMPACT ON RANCHING. AGRICULTURE AND RECREATIONAL OPPORTUNITIES. THAT ANALYSIS MUST FOCUS ON THE ENTIRE ECONOMIC STRUCTURE OF KLONDYKE AS WELL AS ITS CONTRIBUTION TO THE COUNTY TRADES, SALES AND SERVICES ECONOMIC SECTOR.

In closing Graham/Greenlee County area elected officials and community leaders reel that the Bureau of Land Management has not provided accounted data in terms of the commutative social and economic incact of these proposals. Here specifically, and in addition to our specific site concerns, we believe that the Bureau must respond and evaluate the two county impact from a cumulative perspective on the following issues.

LONG TERM IMPACT ON MINING EMPLOYMENT LEVELS IN GRAMAM/GREENLEE COUNTIES INCLUDING REVENUE LOSSES OF MINING JODS AT AN AVERAGE ANNUAL SALAMY OF \$20,000 DOLLARS PLUS AND LIBERAL HEALTH CARE BENEFIT PACKAGES VERSES CREATION OF SERVICE INDUSTRY JOGS MINICH ARE NORMALLY AT OR NEAR MINITUM MAGE MITH NO HEALTH CARE BENEFITS.

page 5

IDENTIFY THE POTENTIAL ECONOMIC LOSS INCLUDING LOSS OF PROPERTY TAXATION DOLLARS WHICH SUPPORT STATE/LOCAL GOVERNMENT AND EDUCATION IF THE 2100 ACRES OF PRIVATE

ECONOMIC IMPACT BY LIMITING RECREATION AND IN SOME CASES COMPLETE LOSS OF CURRENT RECREATIONAL ACTIVITIES ON THE THE RETAIL TRADES, SALES AND SERVICES INDUSTRY, YOUR AMALYSIS SHOULD ALSO FOCUS ON TRADITIONAL RECREATIONAL USES BY CITIZENS FROM THROUGHOUT SOUTHEAST ARIZONA.

LONG TERM ECONOMIC IMPACT OR THE SMALL RANCHING BUSINESSES AS MELL AS THEIR CONTRIBUTION TO THE RETAIL TRADES, SALES AND SERVICES ECONOMIC SECTOR.

WATER RIGHTS AND RESOURCES IMPACTED BY MINIMUM IN-STREAM FLOW REQUIREMENTS INCLUDING DIRECT IMPACT ON THE AGRICULTURAL COMMUNITY. MINIMG AND SAFFORD'S DIRECTLE MATER SUPPLY SYSTEM.

IMPACT ON TRANSPORTATION CORRIDORS, UTILITY CORRIDORS AND THE COST FOR ALTERNATIVES TO MEET THOSE NEEDS SHOULD EXISTING CORRIDORS BE INADEQUATE.

SOCIAL AND ECONOMIC IMPACT BY ADDING MILD AND SCENIC RIVER DESIGNATION TO THE EXISTING GILM BOX RIPARIAN NATIONAL COMSERVATION AREA, UNIQUE MATER SUPPLY DESIGNATION IN THE BONITA CREEK AND CRITICAL MADITAT OF THE GILM RIVER.

The proposed segments within the Graham/Greenlee County area consist of 51.1 river miles consuming some 17,000 acres of public and private lands. Each of the proposed segments are already afforded enhanced federal protection above and beyond the normal agency land management plan. Those enhanced protection measures are the Gila Sox Ripairan National Conservation Area, Unique Mater Supply Designation on Bonita Crock, Critical Habitat Designation of the Gila River up to its one hundred year flood plan, atc.

Your consideration and response to the specific site and cumulative impact questions would be greatly appreciated. Again thank you for the opportunity to corment.

GRAHAM COUNTY BOARD OF SUPERVISORS

Delbert Householder, Chairman

Haynes Moore, Member

Terry J. Bingham, Member

98-1

000098 Nat Cross #502 #65 2219 Fire Septed 1 (000 805 2212)

David I Sale

P.O. BUX 908 CLIFTON, ARZ ONA 85533

July 6, 1994

Mr. Phillip Moreland, Branch Chief Planning, Environment, and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

RE: Comments on Arizona Statewide Wild a& Scenic Rivers Dreft LEIS

Dear Mr. Moreland:

During scoping meetings and comment periods previously held regarding wild and scenic river designation in our area, Greenlee County has made it's concern known regarding the unknown impact of wild and scenic river designation on the various components of our economy. Mining, agriculture, grazing, and flood control are all important components or issues affecting our local economy and lifestyle. In addition, Greenlee County is made up of 91% federal and state lands. Any impacts or restrictions place on public lands have the major potential ramifications.

The single most important component of our local economy is mining. Pheips Dodge Morenci, Inc. (PDMI) operates the largest copper mine in North America within proximity of both the <u>Gita Box: Gita River</u> and <u>Gita Box: Sen Frensico</u> wild and scenic river study areas. The county's largest employer, PDMI has over 2,400 employees which average over \$34,000 in annual salary. Over 80 percent of the county's assessed value or tax base is attributed to the mining operation. State and local sales tax revenues to the county are dominated by mining activities. Millions of dollars for education and state government are generated each year by the mine. It is our contention that the economy of Southeastern Arizona is anchored by the PDMI mining operation in Greenlee County.

Response 98 - 1: Please refer to general response # 2 (Economic Impacts).

Mr. Phillip Moreland July 6, 1994 Page 2

With the economic importance of mining to the State of Arizona and our area, we request that a complete accounting of short and long term impacts upon mining in this area be explored and reported back to Greenlee County and Arizona officials. This investigation should include but not be limited to the impact designation has on:

98-2 "Water Rights (acquiring rights, minimum instream flow rights, current adjudication, severance and transfer of rights, CAP exchanges, etc.)

98-3

"Future Electrical Power Requirementa for the mine since solvent extraction / electro winning has becomes an economical, environmentally sound method of copper extraction. "Sight and Sound Restrictions - Will operation of the mine be hindered due to the fact that the mine operation may be seen or equipment heard form these two areas.

The proposals also have impacts upon the other components of our economy such as agriculture, ranching, flood control and tourism. We do not feel that the draft study deals in sufficient detail in order to understand the potential impacts.

We therefore request that additional studies be effected upon the <u>Gila Box: Gila River</u> and <u>Gila Box San Francico</u> study areas so that sufficient information is evailable to understand the complete economic, social, cultural and historic impacts upon Greenlee County and Southeastern Arizona.

98-4 Our previous comments on this issue have made it very clear that we strongly support the No Action Alternative for these two study areas unless better information is presented.

Sincerety.

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GREENLEE COUNTY BOARD OF SUPERVISORS

Hector Ruedas Chairman Response 98 - 2: Please refer to general responses # 4 (Federal and State Water Rights) and # 5 (Instream Flow Water Rights).

Response 98 - 3: Please refer to general response # 12 (Visual Impacts).

Response 98 - 4: Please refer to general response # 1 (Alternatives).

12 A 8 1994

000004

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

April 18, 1994

Mr. Moreland:

Members of the San Pedro NRCD have recieved and reviewed the Draft Wild and Scenic Rivers EIS documents dated April 1994, reference 1790 (931) 8351 (931).

This District feels that the entire proposal is redundant and unneccessary, however our focus is primarily on the San Pedro. The segments recommended for designation have been more than adequatly "protected" by NCA status and further measures would be wasteful of both time and resources

The District questions the motivation of the BLM in its attempts to duplicate its own so-called protection measures that appear to have no management goals or real purpose other than ownership by the Federal Government

4-2 Finally. We request a statement of the actual cost of this proposal to date

Respectfully yours,

Stan Mazanek Supervisor Response 4 - 1: As stated on page 9 of the draft legislative environmental impact statement, the Bureau of Land Management is required by the Wild and Scenic Rivers Act (P.L. 90-542, Sec 5(d)) to evaluate potential additions to the National Wild and Scenic Rivers System, regardless of any existing designations. Congress has the opportunity to choose from the recommended, or any other, alternative. See general response # 1 (Alternatives).

Response 4 - 2: Actual costs of the project have been minimal because: a) it is an in-house effort and b) it has not required new field research (the primary data were obtained from existing Bureau of Land Management resource management plans, suitability assessments, etc).

The primary expenses have been associated with the required public involvement efforts and the printing of documents. Actual costs for developing individual wild and scenic river management plans will be compiled and available on a river-specific basis.

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Conservation • Development • Self-Government

76t 87 1954

TOWN OF PIMA_____

000067

Box 426 110 W. Center Pima, Arizona 85543 485-2611

July 6, 1994

Mr. Phil Moreland, Chief Branch of Planning Arizona State Office P.O. Box 16563 Phoenix, AZ 85014

Re: Wild and Scenic Rivers Suitability Assessment.

Dear Mr. Moreland:

As the Mayor and Town Council of the Town of Pima, located in Graham County, Arizona, we hereby submit to you our comments concerning the Bureau's Wild and Scenic Rivers Legislative and Environmental Impact Statement.

We have grave concerns with regard to the specific sites which have been

proposed as well as the cumulative impact that this designation would have on our Town and this entire area.

It seems as though our area is the subject of a regulatory onslaught. You should be aware that a portion of the designated areas have already been declared critical habitat for the Razortack Suctor fish and there is also decades old hitgation concerning the water rights to the Gila River. At some point in time these regulations are going to break the "camel's back," so to speak.

We are enclosing for your reference a study which was prepared by the Western Economic Analysis Center describing the Economic Impact on Graham and Greenlee Counties, Artizons, of Designation of a Portion of the Upper Gila River Basin as Critical Habitat for the Ratorback Sucker. Much of this analysis would also be applicable to a designation as a Wild and Scenic River. Dr. Learning was eminerally qualified to make this analysis and it was done at the cost of thousands of dollars.

Bonita Creek is a major tributary of the Gila River. The primary water source for the City of Safford is located there and there are various grazing allorments and recreational uses present. Also, a ten mile stretch of Araviapa Creek has been included.

One thing that should be clearly understood is that Arizona, at least in this area, is a desert and that water is an absolutely critical resource necessary for both man and beast. We do not live back East where the grass grows green on the hillsides. This water is necessary to sustain the rangeland base as well as the mining activity in our area. The copper mine which is located in Morenci is the largest producing mine in the United States employing some 2,400 workers with expansion contemplated. Many of those employees live in our Town and this County.

If all of the attempts to regulate this area are implemented, the cumulative impact will be economic devastation and destruction of communities that have existed for over 100 years.

We ask that you give consideration to these comments and carefully review the attached economic analysis before determining that the proposed areas be designated as Wild and Scenic Rivers.

Respectfully submitted,

Mayor and Town Council:

Response 67 - 1: Please refer to general response # 2 (Economic Impacts).

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67-1

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THE ECONOMIC IMPACT ON
GRAHAM AND GREENLEE COUNTIES, ARIZOMA
OF
DESIGNATION OF A PORTION OF THE UPPER GILA RIVER BASIN
AS CRITICAL BABITAT FOR THE RAZORBACK SUCKER

PRECIMINARY REPORT

Prepared by

George F. Leaming, Ph.D.

WESTERN ECONOMIC ANALYSIS CENTER MARAMA, ARIZONA

January 6, 1994

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SUMHARY

The Proposed Critical Habitat

The United States Fish and Wildlife Service has proposed designation of the Gila River and its 100-year floodplain from Coolidge Dan upstream to the Arizona-New Mexico border as critical habitat necessary for the preservation and recovery of the razorback sucker, an endangered species. The proposed critical habitat area lies almost entirely within Graham and Greenlee counties, Arizona, and includes, besides the Gila River, portions of two of its tributaries, Eagle Craek and Bonita Creek, also in Graham and Greenlee counties.

The Existing Economic Conditions

Graham and Greenlee counties, with a 1992 population of 36,100, have a combined economy that is based largely on the raising of cotton, small grains, and alfalfa on bottomlands adjacent to the Gila River, copper mining in the mountains north of the Gila River, prisons operated by the State of Arizona and the Federal Government, and retirement and welfare payments to local residents. Unemployment in 1992 averaged 9.6% of the labor force, with the total number of persons employed, including seasonal farm workers at about 11,250.

Impacts of Habitat Designation

The designation of critical habitat along the Gila River and Eagle and Bonita creeks, as proposed by the fish and Wildlife Service would have a minimum direct impact of curtailing a recovery in the local agricultural sector and preventing the continued expansion of copper mining activity in the counties. At most, the impact could severely curtail even existing crop raising and copper mining activity. The effects of the designation would reduce the output of these two sectors by at least \$104 million annually, in 1992 dollars, below what it would otherwise be without the designation. That reduction in output, however, could climb to over \$461 million each year, if existing farming and mining are curtailed.

The combined direct and indirect impacts of the critical habitat will be much greater. The total number of jobs lost directly and indirectly in the two counties will be at least 1,380, and the total could go as high as 7,950. Personal income levels in the county will drop by at least \$29.9 million (7.6t of the 1991 level) and could fail by as much as \$172 million (44%). Local government revenues would also be adversely affected, dropping by at least \$3.7 million annually and possibly by as much as \$21.5 million each year.

THE CRITICAL HABITAT PROPOSAL

The Fish and Wildlife Service of the United States
Department of the Interior has proposed designation of a portion
of the Upper Gila River Basin as critical habitat necessary for
the preservation and recovery of the razorback sucker, a species
of fish also proposed for listing as an official endangered
species. The proposed critical habitat area includes part of the
Gila River and portions of two of its tributaries, Bonita Creek
and Eagle Creek, and includes not only the streams themselves but
also their adjacent 100-year floodplains.

Specifically, the proposed critical habitat area includes the Gila River and its 100-year floodplain from Coolidge Dam upstream as far as the Arizona-New Mexico border and includes San Carlos Resvervoir. Above San Carlos Reservoir, the proposed habitat lies entirely within Graham and Greeniee counties, Arizona. The proposed razorback sucker habitat also includes that portion of Bonita Creek and its 100-year floodplain from the confluence with the Gila River upstream as far as the infiltration gallery. The proposed critical fish habitat further includes that portion of Eagla Creek and its 100-year floodplain from the creek's confluence with the Gila River upstream as far as the Phelps Dodge Corporation pumping plant, which is used to take water from the creek for use in the Company's copper mining and processing operations at Morenci. All of both the proposed Bonita Creek and Eagle Creek critical habitat areas lie within Graham and Greenlee counties.

The total proposed critical habitat area within Graham and Greenlee counties encompasses more than 120 miles of stream plus the adjacent 100-year floodplain, which varies in width. Significant portions of the floodplain in the Safford Valley of Graham County and the Duncan Valley of Greenlee County are inhabited or under cultivation, mainly for the growing of cotton, small grains, and alfalfa. Much of the normally available water supply in the three streams has been appropriated and is used for mining or farming or for municipal water supplies in the communities along the Gila River in both counties. Part has also been appropriated to maintain the water level in the San Carlos Reservoir. The water supply is in excess of its current uses only in times of Severe flooding, as occurred most recently in January of 1993, when releasee of excess water from San Carlos Reservoir at Coolidge Dam became necessary.

EXISTING ECONOMIC CONDITIONS

.....

Population

In 1990, the United States Bureau of the Census determined the population of Graham and Greenlee counties, Arizona, to be a combined total of 34,562 persons, of whom more than three quarters, some 26,554, were residents of Graham County, with the other 23t, some 8,008, residents of Greenlee County. Virtually all of the residents of Greenlee County lived in the incorporated municipalities of Clifton and Duncan and in the nearby unincorporated communities of Morenci and Stargo and York Valley, all in the southern part of the county and all within the Safford trade area. Of these, only the relatively small communities of York Valley and Duncan are in the Duncan Valley of the Gila River. Most of Graham County's residents lived in the incorporated municipalities of Safford, Thatcher, and Pima and in the nearby communities along the Gila River that stretch from Solomonville at the east end of the Safford Valley to Byles on the Sam Carlos Apache Indian Reservation on the west.

The population of the two counties has been relatively stable since 1980, with declines in the population of Greenlee County offset by increases in the population of Graham County. In the decade prior to 1980, the populations of both counties had increased significantly. Since the 1990 Census, population in the two counties has risen by more than 4%, to over 36,000.

Table :

POPULATION OF GRAHAH AND GREENLEE COUNTIES, ARIZONA
1970-1992

<u>Year</u>	<u>Population</u>	Year	Population
1970	26,908	1981	34,300
1971	28,700	1982	34.400
1972	28,800	1983	33,300
1973	30,300	1964	33,500
1974	32,400	1985	33,000
1975	31,900	1986	32,500
1976	32,800	1987	32,700
1977	32,900	1988	32,400
1978	32,800	1989	33,100
1979	33,500	1990	34,562
1980	34,268	1991	35,500
1300	51,255	1992	36.100

Source of data: United States Bureau of the Census and the Arizona Department of Economic Security.

Employment and Unemployment

In 1992, the civilian labor force in Graham and Greenlee Counties, Arizona, averaged 12,450, while the number of employed persons averaged 111,250, for an average unemployment rate in the two-county region of 9.6%. This was the highest unemployment rate in the region since 1988, and came just one year after a 6.4% rate in 1991, which had been the lowest unemployment rate experienced in the region in a decade. The total number of employed persons in the two counties in 1992 was the highest since 1981. As shown in Table 2, however, part of the decline in the unemployment rate since the high of 27.2% reached in 1982 was the result of a declining labor force, as unemployed persons left the region during the recession of the early 1980s to find work elsewhere or simply withdrew from the labor force. In 1992, the total labor force in the two counties was still 10% below the high reached in 1982, before such emigration or withdrawal began.

Table 2

LABOR FORCE, EMPLOYMENT, AND UNEMPLOYMENT
IN GRAHAM AND GREENLEE COUNTIES, ARIZONA
1980-1992

<u>Year</u>	Labor Force	<u>Employment</u>	<u> Cnemployment Rate</u>
1980	12,850	11.825	8.0%
1981	12,700	11,700	7.9
1982	13,775	10,025	27.2
1983	12,425	10,200	17.9
1984	11,475	10,600	7.6
1985	10,675	9.325	12.6
1986	10,575	9,375	11.3
1987	10,850	9.600	9.7
1988	10,725	9,600	10.5
	11,300	10,425	7.7
1989		10,725	7.1
1990	11,550	11,425	6.4
1991	12,200	11,423	9.6
1992	12,450	11,250	2.0

Source of data: Arizona Department of Economic Security

The residents of Graham and Greeniee counties are heavily dependent upon a limited number of activities for jobs. As shown in Table 3, these include the retail and wholesale trade sectors and state and local government as well as the mining industry. Virtually all of the jobs in the mining sector are provided by one large employer. In addition, seasonal agricultural work employs a large number of Graham County's residents and some residents of the Duncan Valley in Greenlee County.

Table 3

COVERED WAGE AND SALARY EMPLOYMENT IN GRAHAK AND GREENLEE COUNTIES, ARIZONA FOUNTH QUARTER, 1991 (by place of work)

<u>Industry</u>	Number of Employees	Percent
Agriculture(1)	320	3.5
Mining	1,975	21.2
Kanufacturing	210	2.2
Construction	430	4.6
Transportation and Pub	lic Utilities 200	2.1
Wholesale and Retail T		19.1
Finance, Insurance, an	d Real Estate 145	1.6
Services	1.025	11.0
Federal Government(2)	360	3.9
State and Local Govern	ment 2,870	30.8
TOTAL	9,330	100.0

Includes only employees covered by the employment security laws of Arizona. Does not include self-employed persons, who are mostly in trade, services, and agriculture.

- (1) Excludes more than 1,000 season1 farm workers not covered by the employment security laws of Arizona.
- (2) Excludes some federal government workers who are not covered by the employment security laws of Arizona.

Source of data: Arizona Department of Economic Security

Personal Income

Total personal income received by residents of Graham and Greenlee counties has risen substantially since the early 1980s. As shown in Table 4, the total amount of personal income received by those living in the two-county region has risen by more than two thirds since the recession low of 1982 to exceed \$393 million in 1991, the latest year for which reliable estimates are available.

Table 4

PERSONAL INCOME RECEIVED BY
RESIDENTS OF GRAHAM AND GREENLEE COUNTIES, ARIZONA
1981-1991

Year	Wages and Salaries(1)	Salaries(1) Total Personal Income(2		
1981	\$154,292,000	\$261,768,000		
1982	119,686,000	232,100,000		
1983	135,791,000	247,174,000		
1984	144,081,000	268,982,000		
1985	140,382,000	257,414,000		
1986	143,660,000	270,656,000		
1987	150,230,000	291,246,000		
1988	161,985,000	321,206,000		
1989	169.767.000	344,205,000		
1990	187,163,000	382,371,000		
1991	202,091,000	393,528,000		

- (1) Earned by place of work.
- (2) Received by place of residence.

Source of data: Bureau of Economic Analysis, United States Department of Commerce.

As shown in Table 5, the total of \$393,528,000 in personal income received by residents of Graham and Greanlae countles in 1991 came largely from a small number of sources. The largest was government, including federal, state, and local government employment as well as transfer payments (mostly social security and other federal retirement benefits and welfare payments). Dividends, interest, and rents were also a large source of personal income in Graham and Greenlae counties in 1991, but much of this personal income involved payments made by residents of the two-county region to other residents of the region, as the basic income brought into the region from outside circulated within the local economy. The largest source of such basic income, after state and federal government, was mining.

Table 5

PERSONAL INCOME OF GRAHAM AND GREENLEE COUNTY RESIDENTS

Source of Income	Amount of Per	rsonal Income
farmings by industry (by place of	work)	
Agriculture and related	534	1,510,000
Kining		8,650,000
Construction		701,000
Manufacturing		7.041.000
Transportation and Public Uti	lities d	5.427.000
Wholesale and Retail Trade		5.521.000
finance, Insurance, and Real	Estate 4	128,000
Services		5,364,000
Federal Government		1,911,000
State and Local Government		1,595,000
Dividends, Interest, and Rent		624,000
Net Transfer Payments (1)		1,098,000
Earnings by non-residents		,801,000
TOTAL	\$382	,371,000

(1)Total transfer payments minus personal contributions for social insurance.

Source of data: Bureau of Economic Analysis, United States Department of Commerce.

Table 6

BASIC PERSONAL INCOME RECEIVED BY RESIDENTS OF GRAMAM AND GREENLES COUNTIES, ARIZONA 1990

Source of Income	Amount of Income	Percent
Agriculture and related	\$34,510,000	14.7
Hining	68.650.000	29.2
Manufacturing for export	2,638,600	1.1
Tourism	832,000	0.4
Federal Government Employment	11,911,000	5.1
State Government Employment	35,550,000	15.1
Retirement and Welfare	81,098,000	34.4
TOTAL	\$235,189,000	100.0

The Economic Base

The data in Table 6 show the relationships between the basic sectors of the Graham-Greenlee County region in 1990, the most recent year for which consistent data are available. These basic economic sectors are the activities that bring money into the local economy by exporting their products or selling their services to non-residents. The basic economic sectors thus include federal and state governments and retirement and welfare payments such as social security and other retirement benefits, because those funds are also injected into the local economy from outside. All other personal income received by residents of the Graham-Greenlee economy is the result of the circulation and recirculation within the two counties of the basic (imported) income.

The aconomic base of the Graham-Greenlee County region is dominated by four sectors: retirement and welfare, mining, agriculture, and state and federal government employment. In 1990, retirement and welfare, including social security, military retirement, railroad retirement, and similar benefits, provided more than 14% of the basic personal income in the two-county region. The mining industry, virtually all of it located in Greenlee County, was not far behind with over 29% of the region's basic income. State and federal government employment, mostly at prison facilities in the safford area of Greham County, was the third most important basice economic sector, supplying over 20% of the region's basic personal income. Agriculture was fourth with less than 15%. Both tourism and manufacturing of goods for export from the region have been relatively unimportant in the economic base of the region.

All of the other economic activities conducted in Graham and Greenlee counties, including construction, wholesale and retail trade, transportation, public utilities, finance, insurance, real estate, non-traveler services, and local government, are non-basic in nature. That is, they exist to serve the basic sectors and the resident population, and their contributions to personal income are derived from the money brought into the local economy by the basic sectors.

The Local Government Tax Base

Graham and Greenlee counties get part of their revenues from property taxes and part from the disbursement of sales and other taxes by the State of Arizona under a formula established by legislation and based on local property taxes levied and local collections of state sales and other taxes. In 1992, Graham and

Greeniee counties got a total of \$3,239,693 from the State through such disbursements and collected \$2,551,683 in property taxes. The property taxes were collected on assessed property located within the county. The various classifications of this property and the primary assessed valuations of each class in 1992 are shown in Table

Table 7

THE PROPERTY TAX BASE OF GRAHAM AND GREENLES COUNTIES, ARIZONA 1992

Class of Property	Net Primary Assessed Valuation
Agricultural property, vacant land	\$ 14,389,823
Producing mines and standing timber	154,864,027
Railroads	1,630,496
Public Utilities	18,688,444
Other commercial and industrial pro-	operty 20,319,843
Rented residential property	7,344,758
Owner-occupied residential property	Y 24,361,290
Historic property	9,072
TOTAL	\$241,609,753

Source of data: Arizona Department of Revenue

The five incorporated municipalities in the region, Safford, Thatcher, Pima, Clifton, and Duncan, received a total of \$981,682, in State revenue disbursements based on their populations, while they collected \$111,673 in property taxes. Property taxes, thus are not a major source of revenue for municipal governments in the region.

They are a major source of revenue for the region's school districts. School districts in Graham and Greenlee counties get their revenues from taxes levied on the property within their jurisdictions and through the distribution of state sales and other taxes, including mining severance taxes, according to a formula established by law and based essentially on average daily student membership. In 1992, the six school districts along the Gila River in Graham and Greenlee counties (the Duncan, Solomonville, Safford, Thatcher, Pima, and Fort Thomas school districts) got 71.0 % of their revenues from the distribution of state taxes and 18.5 % from the property tax. The composition of their combined property tax base is shown in Table 8.

Table 8

THE PROPERTY TAX BASE OF THE GILA RIVER SCHOOL DISTRICTS OF GRAHAM AND GREENLES COUNTIES 1992

Class of Property Net	Primary Assessed Valuation
Agricultural property, vacant land	\$11,221,517
Producing mines and standing timber	-0-
Railroads	1,381,546
Public Utilities	13,921,869
Other commercial and industrial propert	y 15,850,041
Rented residential property	3,676,210
Owner-occupied residential property	22,073,917
Historic property	8,740
TOTAL	\$68,133,840

Note: Includes the Fort Thomas, Pima, Thatcher, Safford, and Solomonville school districts in Graham County, and the Duncan School District in Greenlee County.

Source of data: Arizona Department of Revenue.

DIRECT IMPACTS ON THE LOCAL ECONOMY

Direct Impact on Agriculture

Approximately 80% of the crops raised in Graham and Greenlee counties are grown in the bottomlands immediately adjacent to the Gila River. They are irrigated largely with water diverted from the river or its tributaries. Consequently, any designation of the Gila River and its Eagle Creek and Bonita Creek tributaries as critical habitat for the razorback sucker, as has been proposed by the United States Fish and Wildlife Service, would at least prevent any expansion of the currently depressed level of crop agriculture in the two counties to the average level of crop agriculture in the two counties to the average level of cutput of the past five years. At most, because of the uncertainties such designation would cause from year-to-year in the availability of irrigation water, as well as in the right to till the land and use appropriate fertilizers and pesticides, the growing of crops in those lands adjacent to the Gila River in Graham and Greenlee counties could become completely uneconomic and result in a shutdown of the entire industry.

Thus, the proposed critical habitat designation could cost the economy of the two counties at least \$7.99 million each year in lost agricultural output during the term of the designation. Under the more severe probable conditions, the loss could go as high as \$22.87 million annually, stated in 1992 dollars.

That probable loss of farm output would, in turn, directly reduce the personal income received by farm owners and farm workers. The direct loss in personal income from agriculture in Graham and Greenlee counties would amount to at least \$3.02 million per year and could go as high as \$8.64 million annually, in 1992 dollars.

The proposed critical habitat designation also would result in a direct loss of local government revenues in the two impacted counties through reductions in the property tax base resulting from the loss of value in affected agricultural land. Through its negative impact on agricultural land, the critical habitat designation would reduce the total assessed property valuation in the two-county region by at least 1.564 and possibly by as much as 4.478. Reductions of total assessed valuations would be felt most severely in the six school districts along the Gila River that are most heavily dependent upon agricultural property valuations for their tax base. Under tax rates in effect in 1992, the lost local government revenues (primarily county and school district governments) would amount to at least \$250,000 per year and could go as high as \$740,000 annually.

The Impact on Mining

The designation of critical habitat along the Gila River and Eagle and Bonita creeks, as proposed by the United States Fish and Wildlife Service, by restricting water availability and by placing severe requirements on effluent water quality, would adversely impact both existing and proposed mining operations in Graham and Greenlee counties. At a minimum, the habitat designation would prevent bringing the Sanchez Copper Oxide Nine of the AZCO Copper Company into production just north of the Gila River in Greham County and prevent the further expansion of the Morenci copper mining and processing operations of the Phelps Dodge Corporation in Greenlee County. That would reduce mineral output in Graham and Greenlee counties by \$96,200,000 per year (in 1992 dollars) below what it would otherwise be without the critical habitat designation. The effects of the designation, however, by restricting water availability and imposing severe affluent standards, could adversely impact the entire Morenci mining and processing operation, waking it economically unfeasible, particularly at existing copper prices. That, combined with the loss of the Sanchez Mine, could run the total direct loss of mineral industry output in Graham and Greenlee counties up to as high as \$439,500,000 annually, in 1992 dollars.

The probable loss of mineral industry output, in turn, would directly reduce the personal income received by mine workers. The direct loss of personal income from mining in Graham and Greenlee counties as a result of critical habitat designation would be at least \$13,190,000 per year. Under the more severe impact on the entire Morenci operation, the direct loss of personal income from mining in the two counties could reach as high as \$93,010,000 annually, in 1992 dollars.

The proposed critical habitat designation also would result in a direct loss of local government revenues in the two impacted counties, primarily through reductions in the property tax base resulting from the loss of value in mineral producing property. Through its negative impact on the value of mining property, the critical habitat designation would reduce the total assessed property valuation in the two-county region by at least 13.3% and possibly by as much as 73.6%. Under tax rates in effect in 1992, that would directly reduce local government revenues in the two counties by at least \$1,520,000 per year, and the economic loss could go as high as \$10,690,000 annually, in 1992 dollars. These direct losses of local government revenues through reductions in property tax payments do not include the losses of local and state revenues resulting from the loss of mining severance tax revenues paid to the State of Arizona and distributed to local governments throughout Arizona.

Direct Impacts on Other Sectors

Other basic sectors of the Graham-Greenlee regional aconomy, essentially the tourism, state government, federal government, and retirement/welfare sectors, are not likely to be affected directy by the designation of critical habitat for the razorback sucker along the Glia River as proposed by the United States Fish and Wildlife Service.

Table 9

DIRECT IMPACTS OF RAZORBACK SUCKER RABITAT DESIGNATION ON THE ECONOMY OF GRAHAM AND GREENLES COUNTIES

Impacted Economic Sector and Type of Impact		irect Loss 2 dollars) <u>Maximum</u>
LOSSES OF BUSINESS INCOME Agriculture Mining	\$ 7,990,000 96,200,000	\$ 22,870,000 439,500,000
Total	\$104,190,000	\$461,370,000
LOSSES OF PERSONAL INCOME Agriculture Mining	\$ 3,020,000 13,190,000	\$ 8,640,000 93,010,000
Total	\$16,210,000	\$101,650,000
LOSSES OF LOCAL GOVERNMENT REVENUE Agriculture Mining	\$ 250,000 1,520,000	\$ 740,000 10,690,000
Total	\$1,770,000	\$11,430,000
TOTAL DIRECT ECONOMIC LOSS	\$122,270,000	\$574,450,000

Source: Western Economic Analysis Center

INDIRECT, INDUCED, AND ACCUMULATED IMPACTS

Impacts on the Household Sector

The full economic impact of the designation of the Gila River and portions of Bonita Creek and Eagle Creek in Graham and Greenlee counties will not be limited to the direct losses of business, personal, and government income caused by associated reductions in aconomic activity in the counties. The money that is currently received by mine and farm workers, suppliers to those businesses, and local governments in the region circulates and recirculates a number of times within the counties before being dissipated through leakages or outflows from the local economy to other parts of the state and nation. As this money circulates and recirculates, it creates additional indirect personal, business, and government income in a ripple or multiplier effect. As a result of this ripple effect, the direct losses from the curtailment of activity in any basic industry such as agriculture or mining are multiplied well beyond the direct losses caused by reductions in payrolls, purchases, and taxes paid directly by those industries themselves.

The designation of critical fish habitat in Graham and Greenlæe counties that has been proposed by the United States Pish and Wildlife Service will cause an indirect economic loss of personal income in the two counties that would be at least \$13.7 million annually and could go as high as \$70.5 million each year, in 1992 dollars. As shown in Tables 10 and 11, that indirect loss combined with the direct loss of personal incomes in agriculture and mining will cause a total accumulated loss of personal income in Graham and Greenlee counties of at least \$29.9 million each year. The combined direct and indirect loss of personal income could go as high as \$172.1 million annually. The minimum figure is equivalent to 7.6% of the personal income received by all rasidents of the two counties in 1991. The maximum figure is equivalent to 43.7% of personal income received by all residents of the regional economy.

The loss of at least \$79.9 million annually in personal income as a result of the designation of critical fish habitat as has been proposed, would mean the loss of at least 1,380 jobs in the two counties. That would increase the unemployment rate to 20.7% of the existing labor force, a level exceeded only in the depressed lebor market conditions of 1982. The loss of the maximum of \$172.1 million annually in personal income as a result of the proposed critical habitat designation, would mean the loss of as many as 7,950 jobs in the two-country region. That represents a reduction of the number employed in the region by

more than 70% and would increase the unemployment rate to over 71% of the existing labor force. Of course, with that many people without jobs, the labor force would not remain in the counties and there would undoubtedly be a major emigration of residents from the region. The emigration would most likely be to Arizona's metropolitan areas, thereby increasing their unemployed labor forces and significantly increasing the amount of unemployment in both Phoenix and Tucson.

Impacts on the Business Sector

The designation of critical razorback sucker habitat in Graham and Greenlee counties, as proposed by the Fish and Wildlife Service, will cause an indirect economic loss of sales revenues for non-farming and non-mining businesses the two counties that would be at least \$32.0 million annually and could go as high as \$173.1 million each year, in 1992 dollars. As shown in Tables 10 and 11, that indirect loss combined with the direct loss of business incomes in the agricultural and mining sectors will cause a total accumulated loss of business income in Graham and Greenlee counties of at least \$136.2 million each year. The combined direct and indirect loss of business income could go as high as \$634.4 million annually, in 1992 dollars.

Impacts on Local Government

Local governments in Graham and Greenlee counties, including county governments, municipal governments, school districts, fire districts, and a number of other special districts, will see an indirect loss in their tax revenues of at least \$1.9 million each year as a result of the critical fish habitat designation that has been proposed. That indirect loss of local government revenues could go as high as \$10.1 million annually, in 1992 dollars. That is equivalent to almost 30% of all of the revenues of all school districts in the two counties in 1992.

As shown in Tables 10 and 11, the indirect loss in local government revenues combined with the direct loss of tax revenues from agricultural and mining enterprises will result in a combined loss in local government revenues that would be at least \$3.7 million each year and could go as high as \$21.5 million annually, in 1992 dollars. The smaller figure is equivalent to about 11% of the total revenue of all school districts in the two counties in 1992, while the larger figure is equivalent to about 61% of all school revenues in Graham and Greenlee counties in 1992. The full impact of lost tax revenues, of course, would be felt not only by the school districts but by the counties, municipalities, and other local jurisdictions as well.

Table 10

HINIMUM COMBINED DIRECT AND INDIRECT IMPACTS OF RAZORBACK SUCKER CRITICAL RADITAT DESIGNATION ON THE ECONOMY OF GRAHAM AND GREENLEE COUNTIES, ARIZONA

Minimum Annual Loss (in 1992 dollars)

The designation of critical habitat for the razorback sucker as proposed will cause for the Graham-Greenlee regional economy a:

TOTAL DIRECT LOSS OF

\$122,170,000

including direct losses in:

Personal Income of \$16,210,000 Business Income of 104,190,000 Local Government Revenues of 1,770,000

which, because of the circulation and recirculation of income through the regional economy, will result in a:

TOTAL INDIRECT LOSS OF

\$47,650,000

including indirect losses in:

Personal Income of \$13.720,000 Business Income of 31,980,000 Local Government Revenues of 1,950,000

to create an:

ACCUMULATED ECONOMIC LOSS OF

\$169,820,000

including combined direct and indirect losses in:

 Personal Income of
 \$ 29,930,000

 Business Income of
 136,170,000

 Local Government Revenues of
 3,720,000

Amounts are in 1992 dollars.

Source: Western Economic Analysis Center

Table 11

HAXIMUM COMBINED DIRECT AND INDIRECT IMPACTS OF RAZURBACK SUCKER CRITICAL MABITAT DESIGNATION ON THE ECONOMY OF GRANAM AND GREENLES COUNTIES, ARIZONA

Minimum Annual Loss (in 1992 dollars)

The designation of critical habitat for the razorback sucker as proposed will cause for the Graham-Greenlee regional economy a:

TOTAL DIRECT ECONOMIC LOSS OF

\$574,450,000

including direct losses in:

Personal Income of \$101.650,000
Business Income of 461,370,000
Local Government Revenues of 11,430,000

which, because of the circulation and recirculation of income through the regional economy, will result in a:

TOTAL INDIRECT LOSS OF

\$253,630,000

including indirect losses in:

Personal Income of \$ 70,490,000
Business Income of 173,080,000
Local Government Revenues of 10,060,000

to cause an:

ACCUMULATED ECONOMIC LOSS OF

\$828,080,000

including combined direct and indirect losses in:

Personal Income of \$172,140,000 Business Income of 634,450,000 Local Government Revenues of 21,490,000

Amounts are in 1992 dollars.

Source: Western Economic Analysis Center

METHODOLOGY

Direct Economic Impacts

The definition of the proposed critical habitat area and the description of conditions necessary to preserve and recover the population of razorback suckers within that area to a level at which the species would no longer be endangered, together with the legal restrictions that could be made even on existing economic activities in the critical habitat area or on nearby lands, indicate two levels of economic impact that would result from the proposed critical habitat designation: (1) a minimum level of impact involving essentially a preservation of the status quo in agricultural and mining activity on the affected lands; and (2) a maximum level of impact involving a major reduction of existing agricultural and/or mining activity on those affected lands. Estimates of these two levels of direct impact were derived separately for each affected industry and then combined to determine the minimum and maximum total direct economic impacts.

Direct Impact on Agriculture

Foregone increase in agricultural output needed to return existing level of output to average of output from 1981-1991:

\$9,925,000

Percent of two-county output impacted:

00.5

- Minimum annual loss of agricultural business income: \$7,989,600

Average annual agricultural output from crop raising in Graham and Greenlee counties, 1981-1991: \$28,411,000

Percent of two-county output impacted:

80.5

= Maximum annual loss of agricultural business income: \$22,870,900

Percent of gross agricultural business income paid as personal income in Graham and Greenlee counties(1991) 37.8

= Minimum annual loss of personal income from farming \$3,020,100

= Maximum annual loss of personal income from farming \$8,645,200

x Effective average property tax rates for 1992 of \$2.4648/\$100 of assessed value for county governments \$4.3708/\$100 of assessed value for school districts = Minimum annual loss of property tax revenues for: County governments: School Districts: - Maximum annual loss of property tax revenues for: County governments: School Districts: \$473,498 Direct Impact on Mining Foregone annual production from the Sanchez Mine: 25,000 tons Cu Foregone annual increase in output at Morenci 23,100 tons Cu (at average rate of past five years) - Total foregone production: 48,100 tons Cu 8 an expected average price of \$1/lb. of copper

= Minimum annual loss of mining business income _____\$96,200,000

But, under most adverse potential impact, all of the production at Morenci would be curtailed. Them:

Based on actual industry figures for annual payrolls,

Annual value of lost Morenci output:

Foregone Sanchez annual payrolls:

Annual value of foregone Sanchez Mine output:

Foregone annual increase in Morenci payrolls:

= Maximum annual loss of mining business income:

\$10,833,208

\$10,833,208

\$3,784,416

\$389,500,000

\$439,500,000

50,000,000

\$8,155,700

5,032,600

Assessed value of affected farm property (1992):

= Naximum loss of property tax base;

* Hinimum loss of property tax base:

Then, in the same proportions as the loss of output:

= Minimum annual loss of personal income from mining: \$13,188,200

Foregone Sanchez annual payrolls: \$ 8,155,700 Lost Horenci annual payrolls: 84,856,000

= Maximum annual loss of personal income from mining: \$93,011,700

Based on actual industry figures for tax payments to local governments in Graham and Greenlee counties.

<u>Minimum</u> annual loss of local government revenues: \$1,515,600

Maximum annual loss of local government revenues: \$10,689,300

Indirect Economic Impact

Direct income flows, such as payrolls, purchases, and taxes, will circulate and recirculate within a local economy such as that of Graham and Greenlee counties. As they do, they create additional indirect income for the residents, businesses, and governments in that economy. These indirect income usually affect not only those households, business firms, and government units that receive direct payments from the enterprises subject to direct change, but also many who do not receive any direct income from those enterprises. The amount of such income must also be considered in assessing the full economic impact of any change in the level of economic activity. Where that economic activity is expanded, the indirect income generated is positive. Conversely, where economic activity is diminished, the indirect income flows are negative, further increasing the economic losses incurred by direct losses in business income.

As the circulation and recirculation of direct income gains or losses takes place, it multiplies the total impact of the increases or decreases in direct payments for payrolls, purchases, and taxes. Following this flow through the Graham and Greenlee County economy by means of a set of impact dispersion networks (one each for direct business income, personal income, and government income changes) allows the computation of appropriate income multipliers. The application of these income multipliers by means of a combined impact matrix yields an estimate of the indirect income gain or loss generated as a result of the direct income changes. When the direct income changes affect economic activities that bring money into the local economy from outside, as agriculture and mining do in Graham and Greenlee counties, then the indirect effects follow inevitably, multiplying the effects of the direct economic loss.

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July 5, 1994

Phillip Moreland, Branch Chief Planning - Environment Lands, (931) and Recreation Arizona State Office, BLM 3707 N. 7th St. P.O. Box 16563 Phoenix, AZ 85011

> Ref: Commenting on the Environmental Impact Statement (931) i.e. The Wild and Scenic [and Recreational] for the Arizona portion of the Virgin River. Ref: Proposed Roadway, and Virgin River Crossing, as part of an Improvement District.

Dear Mr. Moreland,

I [we] are concerned that nothing contained within the Environmental Impact Statement for the Arizona portion of the Wild & Scenic / Recreational designation for the Virgin River would hinder plans for a river crossing as part of a highway construction project.

£ 83-1

I am one of 572 land owners, owning a total of 5,420 acres in what is now known as Scenic, Arizona, a portion of which is located 2 miles from Mesquite, Nevada. Our need and involvement, having to do with the Virgin River, are totally within Arizona.

The only way to get to Scenic, Arizona, at this time, is to travel an out-of-the-way, bumpy, dirt road through Nevada before arriving at the Arizona line. Because of my role as the "Fetitioner" for the "Scenic Improvement District," I am anowerable to the Public Morks Department of Mohave County, Arizona. The Engineer selected to direct the project will also have to insure that proper procedures are followed with the ELM, and the Los Angeles office of the United States Army Corps of Engineers. The purpose for the creation of the "District" is to get build a highway to Scenic, Arizona, from Arizona Highway 91, next to I-15, on the opposite side of the Virgin River.

It has taken nine months to get the backing of \$1% of the land privately owned in Scenic, calling for the creation of the Improvement District. Once we get additional/appropriate backing from members of the "District", and acquire the rest of the commitments for Right-of-Mays. Mohave County will be in position to accept the "Scenic Improvement District" as a legal entity.

The area that we share interest, is Section 3, T39N, R16N, [SREAM] in Mohave County, Arizona. The total distance of the proposed roadway

Response 83 - 1: The text in the final document bas been modified to reflect a potential change in the proposal from a bridge to a low water crossing. Any crossing or bridge would be prohibited from adversely affecting the outstandingly remarkable values.

across the area in your jurisdiction would be 1/2 mile. It would be about in the middle of the Section (see map) and would run from the NW corner, to the SE Corner.

Your awareness and continued attention in this matter is appreciated.

Sincerely,

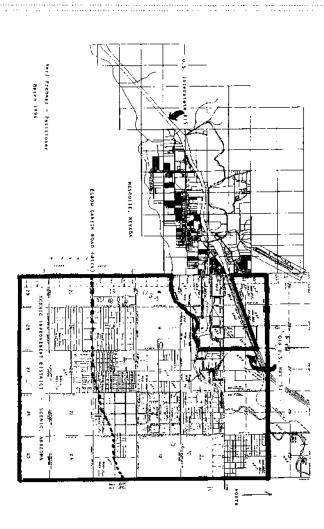
Verl Frehner, Petitioner Scenic Improvement District

P.O. Box 1700 Mesquite, Nevada 89024 Tel: [702] 345-2062

cc Bureau of Land Management Attn: Mr. Roger Taylor Arizona Strip District 390 N. 3050 East St. George, UT 84770-9072

> The District Engineer U.S. Aray Engineer Los Angeles District Attention? SPLCO-R P.O. Box 2711 Los Angeles, CA 90053-2325

Mohave County Public Works Attn: Richard A. Skalicky 3675 E. Andy Devine Ave. Kingman, AZ 86402



Bureau of Land Management, 1994

Letters from special interest groups

FORESTA INSTIUTE 3400 E. Speedway St. . 118 - 293 Tucson, Arizona 85718

P.O BOX 4999 . TUCSON, AZ J.S.A. 85740

RICHARD GORDON MILLER, Ph. D.

CHTHYDUDGY

Phil Mareland BLM Arizona State Cotica 23-4-17

3701 6. 7 8. St Per 75014

ween My Moreland

Kegarding Wild & Scenic Run System protection please ast to riverse the plan encluding Course Court. Canya couch must be protected as into evidously hadital for some bride injurbed in the gladal exceptions. more background for three comment can be done muched from the date in the Danie File Council, as you know. The significence of this singue island of habital about andwigh any and all local or exotic place, programe or provide, or arguments for human employment.

Please do see that Creage Creek be included with all the other reter presently listed, in protection as Wildred Sceme River, and receives.

I regard that I assured afrest at the hearings, an I will be occit of itals (willie at Tuesm acaput 6 um iter 23 in ??) Tanks for your good service to law management Simoney R. G. Willer

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Response 10 - 1: Please refer to general response # 8 (Cienega recommended alternative).

10-1

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PRIZONA STATE CAPICE Environmental Goods
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MR. Morelaus:

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Excusere w/s//

Response 11 - 1: Please refer to general response # 8 (Cienega recommended alternative). Copy and give to people:

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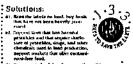
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June 1, 1994

1790 (931) 6351 (931)

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Artzone State Office Bureau of Land Management 3707 N. 7th ST. PO Box 16563 Phoenix, AZ 85001

Dear Mr. Moreland.

16-1

We have reed the *Draft Arizone Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement*, dated April, 1994. After reading the LEIS and attending the public hearing we have chosen to support the All Suitable Alternative.

We would also like to make some comments about the use of off road vehicles, mineral development and grazing management.

Off Road Vehicles

We recommend that no motorized vehicles should be allowed to leave the designated highways or roadways for any purpose other than rescue. All unpaved roads should be closed to motorized vehicle use in all the 40 segments recommended in the All Suitable Alternative.

Mineral Daystopment

We recommend that no mineral development be allowed within the 40 segments. We also understand that the designation of Wild and Scanic Rivers will hinder development on adjacent lands. What is important is that these last special places be preserved.

Grazing Management

No grazing should be allowed in the 40 segments of recommended designation. We also recommend no further development of grazing in upland water sources.

Sincerely,

NADALEMENT

Naomi Mudge Project Coordinator



ه- ۲.0. Box 1891, Teares, EZ, 85705 1891 م. Till: (402) 588-9819 (EZ: (402) 795-2517, e-mail: reco-revisiatire),com به

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Response 16 - 1: Please refer to general response # 1 (Alternatives).

JUN Ö G 1921

SONORAN BIOREGIONAL DIVERSITY PROJECT

May 25, 1994

1790 (931) 8351 (931)

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3707 N. 7th ST. PO Box 16563 Phoenix, AZ 85001

Dear Mr. Moreland,

17-1

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Grazing Management

No grazing should be allowed in the 40 segments of secommended designation. We also recommend no further development of grazing in upland water sources.

Sincerely,

E. Shane Jimerfieto Director

> P.O. BOX 1891, Tueson, Arizona, 85702-1891 TEL: [602]-322-9819 FAX: (602)-795-2527

Response 17 - 1: Please refer to general response # 1 (Alternatives).



SIERRA CLUB

000029 WW 74 1994

Grand Canyon Chapter . Arizona

June 21, 1994

Mr. Phil Moreland, Chief Branch of Planning, Environment, Lands & Recreation Arizons State Office 3707 N Sewarth Street PO Box 15563 Phoenix, AZ 85014

Dear Mr. Moretand

Thank you for the opportunity to comment on the Draft Arizona Statewide Wild and Scenic River Legislative Environmental Impact Statement.

I attended the three public hearings in the Kingman area. Each time, the attendance grow smaller, until the last one on May 16, where only is handful attended with no one warring to speak except for three men from Cypress Begdad Mining. The appearance of the shustdon atomad me in their it could have been concluded that environmentalists warren't very concerned. Those of us who care deeply about all riparian areas in Arizona would condince you otherwise, and then we will fight to the conclusion for maximum notice flor.

Toward this end, I poiled the Sierra Club membership (153) in Mohave County. There was some disappointment over Whight Greek, Francia Creek, and the upper Sente Marie River. They explained that they did not attend the last meeting because the Druk was generally acceptable, since they expected aoms trade off,and that the BLM had done a premy good job.

However, all 153 members want insufmum protection for all ripertan arress, and this certainly means all that qualify under the National Wild and Scarle River System. I would remind you that leap than 10 percent of Artisma's dynation systems remain. That itself should be an alarm shrips to Rachel Cannor's Silvan Rysing, I am 64. Older persons such as myest, have waithfeel the ever-increasing greecy and thoughtless raping and breshing of Artisona's neatmal resources. Hare is a chance to do what you can do to save what is left. How long do you suppose it takes to grow a time-foot-wide contineous?" If want remains of the riperian areas in Artisona is not given maximum protection now, I don't believe there will be another chance, another time.

Perhaps you are wondering why firm not more according, more specific. Well, the SLM has a large staff of scientists, if they would be listened to; and I refuse to be regional. The fact that I have favorite streams, some of them close by, should have no bearing. I don't need to visit, to utilize them, in order that they have value. I care that they all exist and are protected as much as possible.

Thanks again for this apportunity.

Pilchard L. Leibold, Construction Cheir Mohave County Group, Starra Club 4696 N. So-Hi Styd., Kingman AZ 66413

(602) 565-3213

S Sportbul Page

Response 29 - 1: Please refer to general response # 1 (Alternatives).



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JUL #1 1964

Cyprus Amax Minera's Company 9100 Sast Minerat Clice Post Office Box 2259 Englewood, Colorado 80155 303-643-5325 Fax: (303) 643-5988

Les A. Darling Director, Environmental Affairs

June 30, 1994

Mr. Phillip Moreland. Branch Chief Planning, Environmental, Land and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16583 Phoenix, AZ 85011

Re: Arizona Statewide Wild and Scenic Rivers DEIS

Dear Mr. Moreland:

Trensmitted herawith are Cyprus Amex Minerals Company's (Cyprus) comments on the Arizona Statewide Wild and Scanic Rivers' Draft Environments! Impact Statement (DBIS). Our comments consist of this letter, the enclosed Technical Memorandum (dated June 15, 1894) and the five bound reports prepared by SWCA, INC. The bound reports have been previously provided to your office but, we understand, were not provided in time to be considered in the development of the DBIS.

Cyprus has substantial investments in five mining and mineral processing facilities in the State of Arizona and produces a significant portion of our nation's copper supply from these mines. We are continuing to both upgrade and expand these operations with the expectation that we will be recovering the valuable mineral resources at these properties well into the naxt century. We are very concerned that the BLM's Wild and Scenic River recommendations, if approved, would adversely impact our ability to continue mining and processing the mineral resources which exist near river segments recommended for inclusion in the Wild and Scenic system. We have expressed our concerns throughout BLM's EIS process, including offering comments at scoping sessions and public informational workshops, preparing written comments on draft Resource Management Plans (RMP's), final PMP's, and now in commenting on the DEIS. We have maintained a constructive approach in participating in this process and submit these comments and reports in an affort to continue to be constructive.

36-1

Two concerns are of particular importance to Cyprus. First, we request that the BLM reevaluate its data file and the comments submitted on the DEIS and exclude those reaches
of the upper Gila River within Sections 15, 16, and 21 identified as the upstream portion
of Segment 1. This portion of the Gila River involves private and state ownership and
could be readily excluded without fragmenting the remaining iver segment. As the
technical memorandum points out, the presently inactive mining operation (our Christmas
Minel and the existing mineral potential of this area is madequately recognized in the
DEIS. The proposed action should not include this segment for the same reasons that
other stream reaches along the Gila with existing mineral development and considerable

Response 36 - 1: Please refer to general response # 1 (Alternatives).

mineral resource potential have been excluded.

36-2

Second, although Cyprus strongly supports the BLM's proposed action of not including Burro Creek Segment C in the Wild and Scenic River program, we request that the BLM reconsider the inclusion of Segment B. Segment B is entirely within a designated wilderness area and the DEIS offers no convincing or compelling reasons to suggest that this study segment requires wild or scenic or recreational designation to preserve its values. One of Cyprus' key concerns is that Wild and Scenic designation of this stream segment could impair our ability to exercise valid pre-existing water rights which have been carefully protected by Congress in the prior wilderness area designation.

We appreciate your attention to these concerns and trust that the enclosed technical comments and reports are helpful in completing the final EIS and BLM's recommendations. Please contact me if you have any questions on our comments or concerns.

Sincerely yours.

Les A. Darling

LAD:arr

cc: The Honorable Fife Symington (w/o att.)
The Honorable John McCain (w/o att.)
The Honorable John L. Kyl (w/o att.)
The Honorable Bob Stump (w/o att.)
Mr. Lester K. Rosenkrance (w/o att.)

Response 36 - 2: Please refer to general response # 4 (Federal and State Water Rights).

The authority of the Wild and Scenic Rivers Act does not apply to nonfederal land or valid, existing rights.

TECHNICAL MEMORANDUM

DATE:

June 15, 1994

TO:

Bruce Kirchhoff, Cyprus Copper Corp.

Jim Hartdegan, Cyprus Copper Corp.

COPIES: FROM:

. .

Jim Tress, SWCA, Inc.

Jamie Sturgess

Tucson File

RE:

EVALUATION OF BLM'S ARIZONA STATEWIDE WILD AND SCENIC RIVERS LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

At Cyprus Copper Corporation's request, SWCA has completed its critique of selected portions of the SLM's Draft Arizona Statewide Wild and Scenic Rivers Legislative Environment Impact Statement. The segments evaluated are the same as those discussed in previous suitability evaluations completed by SWCA for Cyprus Copper Corporation.

The focuses of this critique are Burro Creek and Francis Creek and reaches of the Gila, Big Sandy, and Santa Maria Rivers. Our critique will first elaborate on some of our general comments regarding the document, followed by specific comments to the BLM's suitability analyses/EIS for each of the river segments.

GENERAL COMMENTS

- At this time, the draft EIS in undergoing the NEPA-mandated 90-day public review and comment period, which will expire on 8 July 1994. The W&SR suitability studies completed by SWCA were submitted after the original public comment period had closed and were not considered in the DEIS. These reports and the data contained within them can be submitted as part of Cyprus' comment opportunity and as such, the BLM must address the concerns, issues, and data contained within them in their Final EIS.
- The public scoping summaries mention the number of persons attending the various scoping meeting(s) but do not quantify the relative importance of the issues and concerns (i.e., how many people were concerned or unconcerned about a given issue, the number of people who supported or opposed designation, etc.). This information would help rank the importance of various issues related to W&SR designation to the local communities that would poentially be effected.

DSR:/WYSING-PHORE/WESEESFC MEM

Bruce Kirchhoff Jim Handegan June 15, 1994 Page 2 of 5

- White the BLM states that 1) designation would create a federal reserved water right for a quantity of water sufficient to meet the purposes of the act on designated river segments." (p. 4, Volume 1): 2) that this water right would be a junior right; and 3) for these reasons water rights issues will not be discussed further, we have yet to see a legal opinion on this issue from the BLM's legal counsel. This would be of particular interest in those instances where maintenance of the outstandingly remarkable value for which the river or river segment was designated could not be maintained without establishment of in-stream flow rights.
- The Comparison of Analysis Table for most of the rivers considered does not provide any clear rational as to why one alternative is preferable over another. In many cases, the summary matrix of impacts indicates no difference between the Proposed Action, the All Suitable Action, and the No Action Alternatives. If there is no difference, does the BLM conclude that the W&SRA provides no more protection of outstandingly remarkable values than is currently being provided by public lands ownership? If so, why designate these river segments to the NWSRS at all.

For example, in Table BC-3 on p. 18 (Vol. 1), the Proposed Action would provide protection for outstandingly remarkable secule values on 7,010 acres, while the No Action alternative would have no adverse impact on the outstandingly remarkable secule values of 8,156 acres. Assuming that the no action alternative would not reduce scenic values, this indicates that there is no risk to scenic qualities within the river corridor. If this is the case, where does the beneficial impacts from implementation of the proposed action originate? In reality doesn't this indicate that there is no difference between the three alternatives for this outstandingly remarkable value? [Note that the same argument can be made when conclusions were reached for the other outstandingly remarkable values identified for this river.]

This finding of no-difference of the alternatives is taken to an extreme on the Middle Gila River where in the summary matrix (MG-3) the analysis of impacts to outstandingly remarkable values by the Proposed Action, the All Suitable Action, and the No Action alternatives are identical.

The BLM appears to be relying on designation to the NWSRS to afford a special degree of legislative protection not already afforded by other kinds of special land status designations such as "wilderness area" (WA) or "areas fortifical environmental concern" (ACEC). While ACEC status is created by regional agency management and can be changed (i.e., it is revokable) without legislative action, both WA and designation to NWSRS are legislative actions that are only revokable by Congress. As stated in Section 7(a) of the NWSRA, "...No department or agency of the United States shall recommend authorization of any water resources propert that would have a direct and adverse effect

DSR:/W711W7-#46ER/WBSE:SFC HEM

Bruce Kirchhoff Jim Handegan June 15, 1994 Page 3 of 5

on the values for which such river was established, as determined by the Secretary charged with its administration, or request appropriation to begin construction of any such project, whether heretofore or hereafter authorized, without advising the Secretary of the Interior or the Secretary of Agriculture, as the case may be, in writing of its intention so to do at least sixty days in advance, and without specifically reporting to the Congress in writing at the time it makes its recommendation or request in what respect construction of such project would be in conflict with the purposes of this Act and would affect the component and the values to be protected by it under this Act." (emphasis SWCA). While the W&SRA provides a significant level of protection to designated rivers, the highlighted portions provided above clearly indicate that any "protection" the Act provides in regard to water resources development projects (and therefore any resulting impacts) can be overridden by Congressional authorization after appropriate review. Therefore, the level of protection currently provided by wilderness designation is as strong as any that would be provided by designation to the National Wild and Scenic River System.

The BLM's suitability criteria are fairly explicit in regards to the identification of existing levels of protection provided rivers under consideration. The implication of those guidelines are that if a river's outstandingly remarkable values are already protected there is no overriding need to provide additional protection.

CRITIQUE OF INDIVIDUAL RIVER SEGMENT ANALYSES

Big Sandy River

Summary of the Proposed Action: The BLM determined that the 6.2 miles of Segment A within the Arrastra Mountain Wilderness Area be included in the NWSRS as wild. Segment B and the remainder of Segment A were determined not suitable for designation.

Summary of SWCA Analysis: In its previous report, SWCA concurred with the BLM's determinations of not suitable for Segment B and part of Segment A. However, SWCA disagreed with BLM's designation of the lower portion of the river as Wild because the entire reach of that segment is within the Arrastra Mountain Wilderness Area, which already affords it as much protection as Congress intended during the wilderness designation process. It is our understanding that Congress did not intend for the designation of the wilderness to interfere with operation of Alamo Dam, which according to the ACOE, could include raising spillway elevations to rectify problems with undersized spillway design.

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Bruce Kirchhoff Jim Handegan June 15, 1994 Page 4 of 5

Other Comments:

The only clear distinction between the Proposed Action and the No Action alternative is the BLM's perception of the protection that would be provided the lower segment from inundation by Alamo Lake. As discussed above, it appears to us that since Congress had intended to allow inundation of a portion of the wilderness area when it was designated wilderness. It is likely that they would allow such inundation of a portion of this segment of the Big Sandy if it was demonstrated by the ACOE to be in the best interest of the public.

Burro Creek

Summary of Proposed Action. The BLM identified 2.2 miles of Segment A, all of Segment B, all of Segment D and 5.5 miles of Segment E as suitable for designation as Wild. The remaining portions of Segments A and E and all of Segment C were determined to be not suitable for designation.

Summary of SWCA Analysts: For this river, SWCA agreed with the BLM's suitability determinations with the exception of Segment B. SWCA disagreed with a designation of "Wild' for this segment because this segment is entirely within the Upper Burro Creek Wilderness Area, which already affords it protection. Inclusion into the NWSRS appears to do little to secure further protection of this segment.

Other Comments: There does not appear to be any difference in the level of protection provided to outstandingly remarkable values by the Proposed Action and the No Action Alternatives. In fact, the No Action Alternative appears to provide more protection of outstandingly remarkable actions when measured by acreage. The basis for the selection of the proposed action is not clear from this table.

Francis Creek

Summary of Proposed Action: BLM determined the entire segment to be not suitable for designation into the NWSRS.

Summary of SWCA Analysis: SWCA concurred with the BLM's "not suitable" determination.

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Bruce Kirchhoff Jim Handegan June 15, 1994 Page 5 of 5

Middle Gila River

Summary of the Proposed Acrton: The BLM determined only the northern 7.5 miles of Segment I (referred to in earlier documents as Segment 3) to be suitable for designation to the NWSRA as recreational. The remaining portions of Middle Gila were considered not suitable for designation by the BLM.

Summary of SWCA Analysis: SWCA concurred with the BLM's determinations for all of the segments, provided that existing mining operations and claims be allowed to continue operations adjacent to Segment 1. No reference or consideration of the data and recommendations presented in the SWCA report is apparent in the BLM's decisions.

Other comments: There does not appear to be any difference in terms of impacts between the preferred alternative (designation of part of Segment 1 as recreational) and the no action alternative (no designation). If this is the case, what 'outstandingly remarkable' values will be prometed, or for that matter, impacted?

The basis for the BLM analysis of impacts under the "mining scenario" is not provided. The document does not state where the assumed mine would occur or what kind of mine it would be. The acreage of impacts for these hypothetical mine operations appear extremely small given the moderate to high mineral potential identified in the DEIS. The DEIS does not fully recognize the potential for mineral development and/or impacts to mineral development that could occur in Sections 15, 16, and 21 (upstream portions of Segment 1 identified in the proposed alternative).

Santa Maria River

Summary of the Proposed Action: The BLM determined that the lower 17.6 miles of Segment A were suitable for designation to the NWSRS as wild. The remainder of Segment A and all of Segment B were determined to be not suitable for designation.

Summary of SWCA Analysis: SWCA concurred with the BLM's determinations that all of Segment B and part of Segment A were not suitable. However, SWCA disagreed with BLM's proposed designation of part of Segment A as wild and instead considered it not suitable because most of this portion is within the Arrastra Mountain Wilderness Area (see previous discussions).

Other comments: With the exception of the potentially invalid assumption that designation would increase protection from inundation from Alamo Lake, there does not appear to be any difference between the No Action and the Proposed Action alternatives.

DSE::WP5007/94689/W#SEMFC.HEN



ARIZONA 000041 MINING ASSOCIATION

DAVID C RIDINGAR

70. es m

June 30, 1994

Phillip Moreland, Brench Chief Plenning, Environment, Lende and Recreation Bureau of Land Management Arisons State Office P.O. Box 16562 Phoenix, Arisons 85014

Dear Mr. Moreland:

NIM DEATT LEIS ADTIL 1994

Attached hereto are communion of the Arizona Wining Association (AMA) and its member companise - ASAROS Incorporated, Cyprus Climax Neteble Company, Nagma Copper Company and Ehelps Dodge Corporation - in response to NIM's April 1994 orate LEES concerning Arizona Statewick Wild and Scenic Rivers.

41-1

Our comments focus upon twonty-three (23) river and stream segments where designation or classification under MSRA would mignificantly impair, or even cause closure of current or future copper-mining operations in the wickinty of such assemble.

If you have questions, or would like to discuss our comments, please contact me.

Siacerely.

Attachment

II.

111. IV. V.

2702 N. Third Street - Suita 2015 - Phoenix, Arizono: 85004 - (602) 266-4416

Response 41 - 1: These comments were received and considered during the period when the Bureau of Land Management suitability assessment reports were prepared (February - September, 1993).

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Map of Arizona

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ARIZONA MINING ASSOCIATION

Jupa 28. 1994

ARIBOMA MINING ASSOCIATION

Comments Submitted

in Response to

Bureau of Land Management

Draft Legislative Environmental Impact Statement

on

Arizone Statewide Wild and Scenic Rivers

April 1994

Member Companies:

ASARCO Incorporated Cyprus Climax Netals Company Magna Copper Company Phelps Dodge Corporation

2702 N. Third Street - Suite 2015 - Phoenix, Arisonia #5004 - (602) 266-4416

INTRODUCTIO

The State of Arizona is blessed with the greatest copper resources in the nation, providing jobs and taxes as well as copper and other materials within the nation's well-being.

and other maturials vital to the nation of work of the Arizons Mining Association (ARA) and its member companies - ASANCO Incorporated, Cyprum Climar Metals Company, Mayma Copper Company of the Arizons Mining Association (ARA) and its member companies - ASANCO Incorporated, Cyprum Climar Metals Company, Mayma Copper Company associated (ARA) Data Legislativa Environmental Impact Statement (LEIS) on Arizons etatewide Wild and Scenic Rivers, dated April 1944. Estakin of these streams appends should be removed from consideration. Our reasons and justifications are presented in this document. These are streams located in the vicinities of mining operations and developments. Impacted mining the vicinities of mining operations and developments. Impacted mining the displaying areas utilized for extraction, tellings and overburden disposal.

The options for locating mining infrastructure and activities are limited to those unique locations that contain commercially viable ore deposits. This is an obvious fact of life for the mining industry. The AMA opposes designation of rivers as wild and acenic where there is conflict with mining properties, developments and communities.

The discussion and pages that follow offer specific examples where wild and scenic designation would interfere with the continuing viability and vitality of the Arisons copper industry, its employees, surrounding communities and the state of Arisons in general. This industry, which consistently produces some 55t of the Nation's newly-mined copper (using no more than 1/s of its of the Nation's newly-mined copper (using no more than 1/s of list of the Nation's accomey in 1931, while employing 11,800 people directly and 56,000 indirectly. Direct contributions to the economy of Arizons in 1931 included 5123 million in eace and local tax payments, 5806 million in purchases from Arizons businesses and 5472 million in payull, along with 52.4 billion in value of products produced. At the same time, Arizona companies have not the challenges of new technologies, escalating contex, compliance with new regulations and global competition.

The AMA supports appropriate and necessary environmental satisfuerds, land vishdrawals, and resource protection efforts and its mamber companies and thair employees have been recognized for voluntary protection efforts. Each member company has made increasing commitments to achieve and exceed compliance with State and Feders) environmental laws and rules.

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Aside from the adverse economic consequences of designation, AMA questions the suitability of including streams that lack truly outstandingly remarkable will and scenic characteristics. Designation of such rivers will not in itself, make them wild or scenic. Designation will not make ephemeral or dry streambeds flow.

For those fivers and river segments discussed herein, multiple-use and other oursent memory-one methods are critical to maintaining Arizona's economy and its mining industry. Such use and proper management methods will also benefit American consumers as well are tax-supported agencies. Hainly unpluyees and local communities throughout the make depend upon a healthy mining industry.

intractructure and facilitium which are neconsary for the successful and competitive production of the sinters weather of Arizona, which is considered the sinters weath of Arizona, which is consistent mational leader in the production of non-tive materials — more than S2.7 billion worth in 1939. The arrama and weather more than S2.7 billion worth in 1939. The arrama and weather more than S2.7 billion which is 1939. The arrama and weather more than 1920 billion with the contract of the successful than 1920 billion with the successful that are the successful that the successful that the successful that are the successful that the successful that are the successful that the succes

ARIZONA MINING ASSOCIATION

DAVID C BIDINGER

Lewter Rosenkrance, State Director Bureau of Land Hanagament Arizona State Office 3703 N. 7th Street Phoenix, AZ 85011

Dear Mr. Rosenkrance:

Arizona Mining Association Recoging Response for RLM Wild and Scenic River LPIS

This statement, on behalf of the Arizona Mining Association (AMA) and its member companies, in in response to the February 19, 1993, Faderal Requister Rotics titled Intent to Prepare a Lagislative Environmental Impact Statement (LEIS) for Suitability, Monaultability Recommendations for Inclusion of Arizona Rivers in the Hational Wild and Scanic River System; Arizona State Office, Phownix, Arizona. Imsues identified in this extrement myse mignificant and should be given full consideration in the LEIS.

It is our understanding that the LEIS will present multability recommendations for inclusion in the Mild and Scanic River (MER) system of 17 to 20 Wiver asgements sescrited with lands cadanic-tayed by Arizons SLM. These river asgements have been identified by BIM as eliquible for whse tettue and classified as wild, scenic or recreatione) in Resource Managament Flama (RMMs) for the Safford, Arizons Strip, and Kidgasan Districts. The Arizons Strip RMP has been approved with a signed record of decision. The Safford RMF has been approved with a signed record of decision pending resolution of a protest of the eliquibility determination for the Clima and Lubest San Francisco Rivers. The Singman RMP is in the dreft stage and a record of decision base not been issued.

Determining MSR eligibility, classification, and suitability is an important and complex process. The AMA is concerned that the potential impact of MSR designation on private property rights, water rights, tax bees, and accommic development reactive full consideration and that the process be in full compliance with applicable laws, including the Mational functionamental Policy Act (MEPA) and the Wild and Scenic River Act (MERA).

The following discussion of MEPA and MERA issues sets forth our concerns regarding evaluation of alternatives and impacts and the eligibility, suitability and management of MER segments:

2702 N. Third Street - Suite 2015 - Phoenix, Argonia 65004 - (602) 266-4416

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Lester Rosenkrance March 22, 1993 page 2

I. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The MEPA process is intended to result in decisions that are based upon an understanding and full disclosure of the money quences of proposed actions. To meet this intent, the Arizona WEM LETS such consider an adequate range of elementary of address the full range of potential consequences which may arise flow WEM designation.

NEPA requires that LEIS "rigorously explore and objectively evaluate all reasonable alternatives" (40 CER 1502.14). The full tabuse of alternatives for the Arizona WSX LkiS must include the following:

- No action alternative (not recommending specific river segments for WSR designation).
- Other BLM and/or state and local agency options for managing a river segment.
- Rescinding the eligibility determination for a river segment.

An alternative which rescinds sligibility determinations is necessory because NEFA compliance has not been completed for all the river segments which have been proposed as sligible. In addition, it is our contention that, because the LEFS is a statewide avaluation, sligibility criteria should be consistent statewide (Son ELIGIBLITY section below). Application of statewide standards may change the results of previous eligibility evaluations and this possibility should be evaluated in the LEFS.

B. ENVIRONMENTAL CONSEQUENCES

The Affected Environment and Environmental Consequences sections of the LETS must successful describe the effect of alternatives upon the environment and must also fully document and evaluate the potential imposts of those elternatives. Also, to meet the requirements of MEPA for full evaluation and disclosure, the Affected Environment and Environmental Consequences sections must include the following topics:

Mineral Resources: Direct and indirect constraints imposed upon development of mineral resources within and outside of the WSR corridor.

Nester Rosenkrance March 22, 1993 page 3

- Water Resources: Potential effects upon surface and groundwatur fights, diversions, and water development facilities.
- Transportation: Potential effects upon planned and existing transportation corridors.
- Sociaeconomics: Potential effect upon local and regional economies, local and state has base, land acquisition and condemnation and reduction in private land base.
- Cumulative and long-term impacts: Full evaluation of cumulative and long-term impacts on local and regional aconomies.

II. WILD AND SCENIC RIVERS ACT (WSRA) ISSUES

The WSRA provides the Authority for designating river amgments, general criteria for river asgments to be included in the WSR system and a general framework for their management. BLM Manuel and provision additional discotion regarding identification, evaluation, and management of WSR sugments. In order to meet NKFA requirements for full disclosure and alternative evaluation, the LEIS must clearly define how the provisions of the WSRA and direction given in AIM Manuel 35th are appecifically applied in Arizona to determine eliqibility, nuitability and the ultimate management of river outpronts which are included within the MSR system.

Section 1(b) of the WSRA requires that to be eligible, a river segment must possess one or more "mutetrandingly remarkable values" (GNVa). The WSRA and RMH Manual 3819 provide broad definitions for GNVa which are subject to a wide range of interpretations. To comply with disclosure requirements of NEPA, the Arizona WSR LETS must provide specific criteria for GNVa in Arizona. These criteria and the provide specific criteria for GNVa in Arizona. These criteria account at a state, This will provide a consistent basis for public review and evaluation of the appropriationes of the slightly and surfability dearminacions. The following criteria for GNVa should be defined in the LETS. Quintainons are from SMH Manual 381.31c.

- Geographic Region: UNVs are defined on the basis of significance within the geographic region. The geographic region which this LEIS he considering should be, at a minimum, the State of Arizons.
- Scenic: The term "notable or exemplary" visual foatures and/ox attractions within the geographic ragion must be defined.

Lester RosenKrance March 22, 1993 page 4

- Recreation: A "dritically important regional recreation opportunity" must be defined.
- Geologic: A "rarm, unusus), or unique" quolugid feature must be defined.
- Figh and Wildlife: Definitions are required for regionally important tigh end wildlife populations and exceptionally high quality fish and wildlife habitat.
- Cultural: Definition is required for nationally and regionally important Native American mitum.
- Historic: Definition of an "outstandingly remarkable" historic value is adequate for availation of eligibility if examples of significant events, important persons or outburn settivity in Arizona are established.
- Other Similar Values: Clear definition of other values which will be considered needs to be provided.

BIN Manuel 8351.31b states that a sugment with less than 40% mix ownership can be designated as slighble only if "the government agency with control. State or local government for private land, supports the finding." These agencies must make clear statements of support for cliqbility for example to be retained as slighble when BIM communably is less than 40%.

B. SUITABILITY

Section 4(a) of the WSRA and 6LM Manual 8351.33A require that a suitability determination for an eligible river segment include evaluation of "characteristics which do us do not make the area a worthy addition to the (national Wild and Scenac River system)". This critoria for segment suitability must be defined and Conwistently applied in the LEIS.

The following factors are specified in BLM Hanual 8351,334 for evaluation of suitability and should be included in the LEIS:

- Status of Landownership, minerals, land uno, and amount of private land.
- Reasonably foreseeable potential uses of the land and related waters.
- Federal, public, state, tribal, local, or other interests in designation or nondosignation.
- Land acquisition costs.

Lenter Romankranen Merch 22, 1993 page 5

- Ability of BLM to manage and/or protect the tiver segment.
- Historical and existing rights.

C. MANAGEMEN

Section 10(a) of the WSMA ruquirum that river magmants within the system nust by managed to protect the values for which the segment was desaymated without insign outher uses that do not substantially interies with public use and enjoyment of these values. The LEIS should include clear definition of the management parameter and implementations on land use that would follow WSM designation on magmant-ty-response basis. These should include:

- Land use limitations within the WHR corridor.
- . Land use limitations setmide the WSR coggider.
- Putuntial impact on surface water and groundwater rights.
- Local agoncy participation
- Land ownership and acquisition policies
- Utility wasements
- Road crossing
- Management status for eligible river segments during the LEIS process.

We recognize that the process of determining eligible and suitable additions to the MER system in important for all of Arizons. It behaves the BIM to proceed in a manner which is consistent with law and clearly identifies the public interest and concerns in these matters. Through compliance with NEPs and consideration of all alternatives and impacts in necessary to serve the public interest.

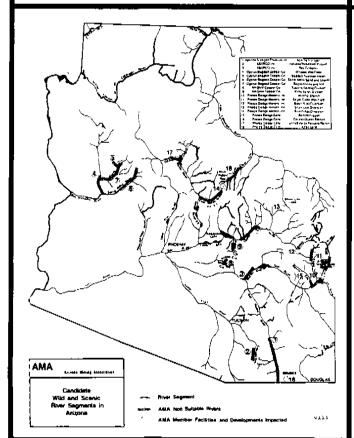
We appreciate having the opportunity to make comments on this lanuar. Our written comments on specials river segments will be forwarded to you in the many future.

Bincerely, David C. Ridinger

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SUMMERT TABLE - AFIZONA MINING ASSOCIATION NOW SUPPLIED BINDES

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Technical/Socioeconomic Data on Specific Rivers of Critical Importance to Arisons Mining Association

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AMA REVIEW - POTESTIAL DESIGNATION OF ARMETT/TELEGRAPH CREEKA

<u>DESCRIPTION</u>: Agnost and Telegraph Cranks; USF5 recommends scanic designation on segments that are 2.5 miles and 1.0 miles in length, respectively. Both extend from their confluence with Queen Crack; Arnett to the north and Telegraph to the south.

The summic designation proposed for these two segments is not fitting. Neither is parametal in nature nor does wither exhibit the outstanding characteristics that would be necessary for a WSR designation. Fortions of these stream segments are already included in a designated Wildernams AYAA and need no further designation.

ADVERAG ECOMONIC IMPACT:

Designation under Wish would have a major impact in the area due to adverse effects on existing industrial activities that support the local measurably of Superior. A premature closure of the Megae-Superior mining operation slong with the cattle ranching, pertite uperations, and sand a gravel industry in the srac could scally result in an estimated loss of some 360 jobs. Expenditures in artisona for the Superior mining operations in 1992, in the form of payroll, purchases of guada and services and state and local taxes exceeded \$30 million.

IMPACTED COMPANIES AND DROUPS:

 Magma Copper Company "Superior Mining Division. Hayma has operated its Superior mine and mill since its Yeopening in 1989. Prior operations date hack to 1915. This facility lies approximately I wile mant of the proposed stream superator. The millsite tailings, muster stws, and mill itself are in definite visual proximity to the attream. Superior is within the "scenic essement" for them two streams.

Nagma's water rights in the area include a single wall (Salmont Hine), that live within the drainage area of Talegraph Creek. This wall is currently not being used, but Hagma may utilize it at a future time.

- Salt River Project (SkP). SRP provides power to Hagma and all of the surrounding area. Last year Magma purchased 53,511.740 kilowatts of power from SRP.
- Cattle Ranching. It is unknown at this time how many renchers currently have cattle operations within close proximity of these promised Asgments; however, cattlerateing is common in those areas.
- Perite Operations: A perite mine is operating approximately 1/2 mile east of the Ficket Post area, very close to Twiegraph Creek. It is unknown how many people are employed and what the economic impact may be

POTENTIAL DESIGNATION OF ARBETT/TELEGRAPH CREEKS

IMPACTED COMPARIES AND GROUPS; continued

- Euperior Municipality. The town of Euperior lies 1-2 miles wast of these segments. This municipality would be affected significantly by the loss of 360 jobs.
- Sand and Graval. Guzman Construction Company, Inc. operates within 1/2 miles of Telegraph Creek and amploys 6-10 workers.

ANA POSITION:

WSR designation as scenic of Arnatt/Telegraph Creeks is inappropriate for the following resenue:

- Extreme adverow economic impacts upon the local and regional areas due to the impacts upon at least five separate economic activities.
- 2. Major facilities already to place and operating.
- Hoat of Twiegraph end a small portion of agneti Creeke already lie within a Wilderness area and should need no further designation.
- Arostt does not meet the criteris of "outstanding" for its designation.
- The surface flow of Arnett and Telegraph Greeks is "intermittent".

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AMA REVIEW - POTISTIAL DESIGNATION OF MIC CAMPI RIVER. BLM RECREET 2

DESCRIPTION: Big Sandy River, him Segment 2 (BIM dov. p.73), mightnen miles long. Agency recommends 1/.4 miles as while and 2/6 miles as serence. very low factors land position - predominantly

BlW Segment 2 includes wighteen miles of the Big Sandy River from the bridge on U.S. Highway 93 downstream to the Signel townsite. Of this potential Will assemble, the great majority is private property, with only 37% under BLM jurisdiction. Except for a +mjle reach unsheldstely uperteen from the Signel Road crossing, where the Big Sandy flows intermittenily through a rather condescript range of grante hills, this potential MSR segment is largely characterized by barrew mand migrating back and forth within a broad, desert scrup-covered floodplain. Low terraces within and adjacent to the floodplain have been widely method for must than 100 years, with ranches, small farms, and retirement residence providing homes for some 50 readidates within the broad, hot, low demart valleys that make up this segment.

ADVERSE ECONONIC INPACT:

Very high potential for significant adverse economic impects to the regional economy because three important utility corridors lie within the proposed WSR corridor, requiring read access for maintenance.

Potential complex and very contentious long-term water rights issues threaten the regional economy and numerous local property owners.

IMPACTED COMPARISE AND GROUPS:

- 1. Cyprus Bagde# Copper Corporation upwistes a world-class copper mining and milling complex employing more than not people at Dagded, twenty miles heat of Segmant 2. In 1992, Cyprus-Bagded paid \$4.2 million in property taxes, making it one of the largest tempayers in Yawapai County, in addition to sustaining the 2500 people residing in Bagded, and survices worth \$80 million, lent year Cyprus-Bagded's enveral direct economic impact totaled about 31 million a day. The importance of the Begded mining operation to the local and state economy is growing yearly. In addition to the Bajor threat of advarse impacts to the private property and mistoric in account and the second property and the second property and second mining operation to the local and state economy is advarse impacts to the private property and mistoric in attempts and water cipits along the Sig Bandy, Arizona Mining Andertation attempts property and second mining and contact of the Cyprus-Bagded facility.
- Arisana Electric Power Cooperative, Inc. delivers power to Begdad through like as KV Parker powerline that traverses Begment 2 near the Signal Road Consting.

POTESTIAL DESIGNATION OF SIGNAMUL RIVER. BLR SEGGEST 2

INPACTED COMPARIES AND GROUPS, continued

- Citizens Utilities Arizons Cas Division meinteins a bursed pipeline delivering naturol yes to the Bagdad operation. This pipeline right-or-way crosses the Big Bandy just south of the Arizons Electric Power Company powerlins.
- Wohere Electric Cooperative, Inc. services customers via more than 4 miles of powerline lying within the proposed wSk corridor.

OTHER GROUPS AND POPULATION CRETERS ADVERSELY IMPACTED:

Any significant adverse WBR Impacts on Cyprus-Raydad will be reflected by economic lagama throughout the region. Recdest hit would be the Yavapai County school detricts, Bagded and the business communities of Present and Mickenburg. In Mohave County, the communities of Kietup and Signal, along with the Communities of Kietup and Signal, along with several property owners, would be most severally impacted by WBR designation.

ANA POSITIOS:

bim Segment 2 of the Big Sandy is clearly ussuitable for wild a Scenic River designation for numerous ressons, the most compelling being:

- Request 2 fails the fundamental WSR test, Decause there are no truly "outstandingly remarkable" values. This sequent is characterized by a predominantly dry sand wash with only integritten atreas flow, and has been so badly floodradayed that tipstian values are almost non-majatemy.
- Potentially highly adverse economic impacts are related to utility corridors and maintenence of access over more than seven miles of councy and local graded roads.
- By far the grantest threat to private property and the regional aconomy stems from the spectus of prolonged waterrightm litiuation related to complex, unresolved insular including in-stream rights, and forms water adjudication complicated by faderally-reserved waters for wild & Scenic River usage.

AMA REVIEW - POTESTIAL DESIGNATION OF BLUE RIVER, ASCREET 2

<u>RESCRIPTION</u>: Sive River: USFS - 34 miles recommonded by Agency an acaste - 19 miles as recreational. Segment 2, south of the Bive Ridge Printitive Area and north not the Morenn cre deposit, is 12 miles long. Designation under WER of this segment would precipite adverse mconomic impacts in various ways.

The swe traversed by the proposed while and scenic river segment has significent potential for mineralization. This segment is located 8 to 1 miles northwest from the Moranci ore deposit. USGS Rullerin 1261-1 indicates mineralization at the southern margin of the Blue Ridge primitive Area which is traversed by this corridor. Fortions of the river corridor at the southern boundary of the primitive area were prospected by Phelps Dodge in 1874. This prospecting resulted in drilling which semuountered and sulfate alteration and pyrite without economic minerals. The alteration is indicative that other of geophysical data for them in the area. Seincepretation of geophysical data for the mineral willing targets.

ADVERSE ECONOMIC IMPACT:

Restriction of vehicular access within the designated river corridors in Greenlew County north of Clifton isolates mignificant Actaege surfounded by the rives barriant. This isolation of public land precludes the development of the land yrestricting access for utilizes and whiches. It is in the best interest of the public to leave this prospective ground accessible for multiple-use and future development.

IMPACTED COMPANIES AND GROUPS:

- Phelps Dodge Morenci mining operations w future expansions.
- 2. Public utilities rights-of-way.
- Rural communities of Clifton, Duncan, Morence and Nafford.
- 4. Cattle growers.

AMA_POSITION:

WER designation of Segment 2 of Blue River is inappropriate for the following reasons:

 MSR restrictions upon future development of sineral deposits near the Morenti mine would have mignificent economic consequences for the local economy, including the mining operation.

ANA REVIEW - POTENTIAL DESIGNATION OF SLUE RIVER, SECREBI 2

MA PORITION: continued

- Existing access routen to Eultiple-use land cross the river corridor during periods of low river flow. Use for access would be incompatible with designation of the river.
- s. Some three percent of the entire river is privately held.
- Current USYS land-use plane protect the river. Upper teaches of the river are protected by the Blue Ridge Primitive Area.

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SHA REVIEW - POTENTIAL DESIGNATION OF SOUTH CREEK, SECRET 1

DESCRIPTION: Bonita Creek: BLH - All is wiles recommended by agency of recreational.

The fitteen-mile iong segment reaches from the San Carlos Apacha Indian Reservation to the confluence with the Gila Afaver. The Gila Box Riperian Retichal Competetion Area encompasses 1004 of the Segment and needs no further protection.

ADVERSE ECOMONIC INFACT

This segment, adjacent to future mining operations near Gafford, is located in an area not fully teated for its mineral potential. MRR designation may physically restrict potential area from expansion, utility essence mer the planned operations, or may impede parattain projects. The segment is also downsteam from a City of Safford water source which contributes to the flow of the creek.

The eegment includes ranch land purchased by Phelps Dodgo Corporation for a BLM land wachenge at the Safford property for production facilities. The exchange was not protested in the BLM RMF on the basis of the Glie Box agreements buccuse a Wild and Scenuc recreetional designation would be less restriction than the land-une requirements of the Glia Box RRCA plan.

IMPACTED COMPANIES AND GROUPS:

- 1. Phelps Dodge planned mining operation at Safford.
- 2. City of Safford water supply.

ANA POSITIONA

Wild I Scenic River designation of Bonite Creek, Segment 1, is inappropriate for the fullowing ressons:

- Gity of Safford water is supplied from the collection gailery in Upper Bonita Creek.
- Planned mining operations within one mile of the creek will be impacted by the designation.
- The eres is highly mineralized and adjacent to a known mineral deposit.
- The area is part of the Gils Box National Riparian Protection Area and needs no additional protection.

AMA REVIEW - POTENTIAL DERIGNATION OF BURRO CREEK. SECREMIA. 1

<u>DISCRIPTION:</u> Burro Creek, Regiment 1: BLM - Agency recommends deven caller as recreational.

in miles de recreational.

Four miles of upps i Nurio Cheek, extending upstream from the Wilderness boundary at Cyprus Bagdad Copper Carporation Francis Creak Road to a point above rrancis Creak. OLD-managed public lands make up only 13% of this portion of Segmint 1. This reach of nurio Creak has many similarities with the adjoining Segment of Lower Frencis Creak, and is orgely ted by Francis Creak at Ouring the dry season. The Cyprus Bagdad water and nurincing an pipulinas, and Francis Creak nucested size a segment of Surro Creak, and the melin Francis Creak nucested size agreement of Surro Creak, and the melin Francis Creak nucested size agreement of Surro Creak, and the melin Francis Creak Nucested Size Corridor, half way up the seat sade of Surro Creak Canyon. This part of Surro Creak already is storded extraordinary protection because it lies insediately uporteems from the Upper Surro Creak Milduziess, and because it is within the Francis and Durro Creak Unique Matera Protection Asse.

WSR designation is totally inappropriate for this portion of Surro Creek because of Bagdad's community water system and potential conflicts perhaps even including a federal taking of hintoric in-matrials water rights owned by Cyprus Bagdad Copper Corporation.

ADVERSE ECONOMIC INFACT:

There is a high potential for extremely adverse local and regional economic impact because of the direct threat to Cyprus bagdad in-etream water rights, one fangdad's 20-year old, \$7 million community water aupply system.

INFACTED COMPARIES AND GROUPS:

- Cyprus magded Copper Corporation and 2,500 residents of Bagded who depend upon the long established Francis Creak water system for about 85% of the community water supply.
- Bural community and county. The 20-year old, \$2 million francis Creek water mystem is vital to Cyprus Bagdadis long-range upstation; proposed WER designation constitutes a vory real threat to the local and state economy. (a 1997, Cyprus Bagdad paid more than \$4.2 million in mtate and local taxes, including \$4.2 million in property taxes, making Cyprus Bagdad one of the largest supportary of the Yavapai County school districts.
- Local ranchers, state and faderal land and wildlife
 managers, butters and other outdoor recreationists all
 depend upon Cyprus Bagdad's pipeline hoad to provide
 accuse into the upper Burro Creek and lower Francis Creek
 area.

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ANA REVIEW - POTESTIAL DESIGNATION OF SURRO CREEK, RECHEMT 1, continued

AMA POSITION:

WSR designation of Murro Creek, Regment 2, is inappropriate for the following reasons:

- mean than 15% of this reach of Burro Creek is federal land.
- A potential lederal "taking" of Cyprus magded's historic in-arream water problem would have a devantating impact upon the town of Baddad and its 2,500 residents and the local economy.
- Because of existing unique waters protection and gentrictions rolated to sulparmana immediately downstream, WSR desugnation would constitute a totally unnucessary and added layer of bytesubratic sanagement to be funded by the adopter.
- Cyprus Bagdad's succis and maintenance requirements related to the Francis Creek seter system constitute an irrenonciable conflict with with designation. In addition, the required truly "outstandingly remarkable" values are lacking within this leggment.

AMA REVIEW - POTESTIAL DESIGNATION OF SURRO CREEK, SEGMENT 2

<u>DESCRIPTION:</u> Surro Creek, Segment 2: BLM - Agency recommends as we males as week-ational.

makes as recreational.

Seven miles of Burro Creek, beginning at a point shout a balfnils decentrated from Six*Mile Creeking and extending upstream
to the wouthern boundary of the Upper Burro Creek Wilderness
hies. This portion of Burro Creek his predominately pit/wate
land belonging to Oypers Beggdad Copper Corporation and its
subsidiary, the Syney Cattle Company, Histing Blu control to
leve than 40%. Cyprus has three historic in-stream water
lights of Surso Cruek where its main 24-inch Wikipup equadout
crosses this proposed WBR cognant. Except for a small canyon
out in granitic rucks deviateroum from the Boulder Creek
confidence, the internitetent flow of Burro Creek is confined
confidence, the internitetent flow of Burro Creek is confined
marking the renter of a broad valley. A graded road tollows
the atteam the length of the valley, and the nid county Youl
to Kingman crosses Burro Creek at Six-Hile Crossing. There
are no truly unique or "outstandingly remarkable" values along
Segmant 2 of Burro Creek.

WER demignation is totally inappropriate for this portion of Burro Creek for many reasons, including the fact that it is predominately private property.

ADVERSE ECONOMIC IMPACT:

There is a high potential for extramely advarse local and regional economic impact due to conflictu requiting from local land uses incompatible with MSP designation. A significant potential exists for multi-billion dollar losses to the atata end local economies, due to premature cloure of the Cyprus Bagdad mining and milling operation. The loss of 400 or more many and approximation of the control of the million of the control of the cont

INPACTED COMPANIES AND GROUPS!

- 1. Opprus Bagdad Copper Corporation and 2,300 residents of Bagdad. Opprus operates a world-class mine and milliam complux few miles aaks of Burec Creek. A 600-600 thigh Mammuth Wanh tailings dam lies in close visual proximity to this asgment of Burec Creek, and in the future wapanding tailings dams will have much greater visual impacts on the signess and unavoidable visual impacts of continuous proposal was corridor. Complex water rights jesues and unavoidable visual imperts of continuous visual imperts of continuous visual imperts of continuous visual imperts of the Cyprus Bagdad minu.
- Arizona Electric Power Cooperative, Inc. provides power to the Bagdad operation via the 59 KV Parker transmission line that coasses this asymmetry B surren Creek.

AMA REVIEW - POTRETIAL DERIGEATION OF SURRO CREEK, SECHENT

IMPACTED COMPANIES AND SHOOPS: CONTINUED

- citisens thimities delivers natural gas to Cyprum Bagdad vie a papeliam clossing the central part of the proposed MSR corridor, a short distance downstream itom Cyprum Bagdad's mean wikingup water line crossing.
- qua membercas mines high-veiue claye from several puts within the proposed segment.
- Symer Cettle Company has already invested more than 360,000 to establish a SLM award-vinning Riperian improvement Area along this part of Surro Creek.
- 6. Nursi community and county. A premature closure of the Cyprus Bagdan copper mine could result in the loss of sore than ado jobs and downstate the 1.00 residents of Bagdad. In adultion, the state and regional educations would stand to loss annual business purchases exceeding \$80 million and tax revenues of bethaps \$100 million. Yavapai County schools and businesses in Prescott, Wickenburg and Millaids would feel the impact the most.

AMA POSITIONA

WSR designation of Burro Creek, Segment 2, is inappropriate for the following reasons:

- Extreme adverse local and regional economic impacts with impact on at least five supports compenses.
- Predominately private land, less than 40% Blm controlled with no truly "outstandingly remarkable" values.
- Najor tailings facilities and historic in-etream water rights, resulting in resecucilable use conflicts.

AMA REVIEW - FOTERTIAL DIBIGHATION OF CAMPAIGN CREEK

OKECRIFFICE: Campelge Dreek: USFS = 10.5 milen of the li-mile segment are managed by USFS. Designation in not recommended by the edency; AKC proposes wild/seemid designation.

The segment is within the view shed of Mogen's Pinto Valley maning operation, which, if designation takes place, could be of major concern, as could be the designation and location of high water merke.

ADVERSE ECONOMIC IMPACT:

Exploration for, and operation of, luture mines within this highly mineralized district could be severely limited by a WRR designation, ser could the operation of existing mines. In 1991, Magma's Pinto Valley operation employed 662 workers and contributed 364.7 million to the Arzons economy in the form of payroli, etter and local taxes and purchases of goods and services from Arizons businesses.

Salt River Project (SRP), provider of power to Magma's mining operations and surrounding communities, would be impacted Significantly by comely restrictions on the mining facility.

IMPACTED COMPANIES AND GROUPS:

- Maghar's Finto Valley mining operations.
- Rural communities of Miemi and Globe where a majority of Magma's workers reside.
- 3. Salt River Project.

AMA POSITION:

WSR designation of Campaign Creek is inappropriate for the fullowing reasons:

- The magment is adequately protected in that it lies partially within the Superatition wilderness area.
- 2. The surface flow of Campaign Creek is intermittent.
- Adverse economic impact would be placed upon the rural communities of Miami and Globe if continuance of mining operations were limited in any way.

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AMA REVIEW - POTENTIAL DESIGNATION OF CLEMPCA CREEK

DESCRIPTION: Cjenege Greek: BLM = All 10.3 miles. No eligibility determination by squency. Proposed as scenic by ARC. The segment hat been purchased from private conners and is 100% protected as Empire-Clenega Resource Conservation Arca.

ADVERSE SCONONIC IMPACT:

ASANCO Incorporated has plans to develop the Rosemont/Helvetia Mine, which would be visible from the water corridor. If this segment is development as scenet, permitting would be extremely difficult if at all possible. The operation would provide 800-800 high-paying hew john for Arizona readents.

IMPACTED COMPANIES AND GROUPS:

- 1. ARARCO Incorporated with 600-800 potential jobs.
- Tucson Electric Fower Company (TEPCo) utilizes corridor for power transmission lines.
- Ranchers and recreationists could lose right to accept the area.

ana position;

 $\mathbf{w}\mathbf{S}\mathbf{X}$ accord designation of Clanege Creek is inappropriate for the following reasons:

- The entire segment is protected as a National Conservation Area.
- 2. The crowk in intermittent end ephemeral.
- Sums 600 to 800 potential jobs would be in jeopardy.
- twpCo transmission lines positioned in the corridor would have to be relocated at great expense.

AMA REVIEW - POTENTIAL DESIGNATION OF EAST CLEAR CREEK

DESCRIPTION: East Clear Creek: USFS - All 25 biles recommanded as accule by squady.

ADVEREE ECONOMIC IMPACT:

The proposed segment begins I mile below the Blue Ridge Dam which controls the flow of the creek. Designation as part of the wild and Scenje Kaver System could assult in potential interference with the continued operation of Blue Ridge Dam, apparently with maintenance of the structure. Applications for Gredge and fill permits for maintenance of the reservoir could be restricted and real estate number by Pholps Dodge Corporation could be restricted from development.

The wetur from Blue Ridge Memervoir is pumped into the East Clear Creek for use by Sait River project customers in exchange for water used at thelps Dodge's Morenci mine and the Lewis of Clifton and Morenci.

Meatrictions on the future operations of the Morenci mine would puse significantly adverse consequences upon the mine and the local scannowy. In 1931, Phulyas bodge Morenci, with employment of almost 2,100 workers, contributed over \$330 million directly to the Arizons economy, including \$10 million in state and local texos. \$80 million in payroll and \$700 million in purchases of quode and satisfue from Arizons supplies. The communities for understanding supplies. The communities of understanding operation with materials and cervices. Current sining operation with materials and cervices. Current sining operations that involve mounds, each movement or visual impairments could be significantly restricted by WSM designation.

IMPACTED COMPANIES AND GROUPS

- Phelps Dodge Corporation's Moranci operations provides ampleyment for 2,100 workers.
- The municipalities of Morenci, Clifton, Duncan and Safford benefit directly from the occnomic impact of the Morenci mining operation.
- Balt River Project Customers Taly on water transfers from the Blue Ridge Reservoir to East Clear Creek.

AMA POSITION:

This river segment should be removed from the eligibility list for wild a Scenic Rivers for the following russons:

 The uput; east impoundment of the crook makes it unsuitable habitat for the TAN epacies.

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AMA REVIEW - POTENTIAL DESIGNATION OF EAST CLEAR CREEK

AMR. PORITION: . continued

- 2. Existing wilderness and uSfS land-use plans protect 22 miles of the river.
- 3. Approximately 22 percent of the land is privately owned.
- The existing Blue Ridge Reservoir, one mile north of the augment, provides future opportunities for development of the water resources.

AMA REVIEW .- POTESTIAL DESIGNATION OF EAGLE CREEK, MECHENT 1

<u>PERCENTERION</u>. Eagle Creek: USFS - 21 mile segment from Four-Dreg Manch to the end of the USFS designated segment. Agency recommenda designation as recreational.

ADVERSE SCHOOLS INPACT:

Designation as MSR would have a significantly adverse economic impact upon the communities of clifton. Duncam, Musanci and Safford and would interfere with the continued operation of wells, pipelines and discharge technician on national forest cights—of-may. The thinsport of water from Eagle Creek is vatal to the Pinese Dodge Mniangle in ining operation and to the towns of Clifton and Moranci.

Newtiactions on the future operations of the Moranti mine would pose significantly adverse consequences upon the Mahe and the local enumny. In 1991, theless bodge Morant, with amployment of almost 2,100 workers, contributed over \$500 million discretly to the Arisons economy, including 330 million in state and local texes. \$60 million in payrell and \$20 million in purchases of goods and services from Arisons suppliers. The communities in rural Greenlee and Grobus local businesses supply the manned perfection with materials and services. Current maning operation with materials and services. Current maning operations that involve sounds, marth movement or visual impairments could be significantly rentricted by MSR designation.

IMPACTED COMPARIES AND GROUPS:

- 1. Phelps Dodge Morenci operations with 2,100 Workers.
- 2. Reaches inneted within the river corridor
- Towns of Clifton and Moreoni dependent upon Weter transported through the river segment and where a large number of mine Workers live.
- 4. Public utilities with rightm-of-way along the river corridor.

ANA POSITION:

WSK designation of Eagle Creek, Segment 1, is inapproprietator the following reasons:

 The segment from the Four-Drag Ranch to Sheep Wanh is in excess of 500 private summership. Crossings of the stream frequently are maintained for access to ranches and a achori house that lie within the corridor.

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AMA REVIEW - POTENTIAL DESIGNATION OF MADLE CHEEK, RECHENT A

AMR FORITION, continued

- Phelps Dodge Morenci water facilities are visible from much of the river corridor which could interfere with a scenic designation. The majority of the water flow is created by discharge from Phelps Dodge water facilities.
- USFS land-use plane currently protect 20 miles of the creek; the San Carlos Apache Tribe manages lands adjacent to the creek. No additional protection is needed or justified.

AMA REVIEW - POTENTIAL DESIGNATION OF PRANCES CREEK, SECREENT 1

DESCRIPTION: Francis Crock, Segment 1: BLM - Agency recommends 4.8 miles de recreational.

Fourteen mise of Francis Creek, upstream from its continence with nurre Creek. BLM Segment 1 is only 34% public land, and includes Bagdad's main water supply at the feerowned Francis Creek spring pumping station. Approximately 85% of haquad's through a 13-mile long aqueduct system that includes major natural-gas powered pump station was the Warnelic Creek Springs and four miles southeast in Burro Creek Canyon. Except for the 2-5 miles-long reach from the springs downstream to Burro Creek, exancis Creek is pradominantly a dry, intermittent creek, exancis Creek is pradominantly a dry, intermittent mountain exteam contined to a narrow barren canyon developed in Nicosene-age volcanic cocks. All federal land along the perennial lower reach of Francis Creek is sleedy included in the Upper Nutro Creek Wilderman Area, and the estire personnial stream in already highly protected as part of a state-mandated Unique Water Protection Area.

The Arizona Rivers Coalition proposes a seven-mile segment upstream from the Burro Creek confluence - both the RLM and ARC proposals are unautable because of land ownership and water-wes conflicts.

ADVERSE ECONOMIC IMPACT:

There is a high potential for extremely edverse local and regional economic impact because of threat to Cyprus Bagdad's in-stream water rights, and Dagdad's twenty-year old, 22 million community water system.

ha one of Yavapai County's largest taxpayers with more than 54.2 million in total property taxes paid in 1992, any long-term adverse affects upon the Cyprus Bagdad mining operation will lapact jobs, and state and county tax revenues. In addition to mustaining the 2-bor cusidants of Bagdad, and supporting the Arizons Dubiness country by buying qoods and envices writh about 560 millions, in 1992 Cyprus Bagdad's Overall direct scommic impact totaled more than 51 million per day.

INPACTED COMPANIÉS AND GROUPE:

 Cyptus Regulad Copper Corporation and 2,300 residents of Beedad, are elecat entirely dependent upon the Francis Creek pumping system for their water supply. This is the Community's only dependent exter supply and provides shout at a disapted a water needs. Continuing use of the Francis Creek access road, and operation and maintenance of cyptus Requal's flow converted-dissel engine pumps, the 12-linch waterline and its 2-linch natural age pipe jame are presentation of uses incompetible wath MSR designation.

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REVIEW - POTESTIAL DESIGNATION OF PRINCIS CREEK.

IMPACTED COMPARIES AND CROUPE; continued

- Tavapai County and the State of the twenty-year old Francis Creek water system is vital to Cyprum magdad's mining operation. Prophesed with dealghartion on Francisco Creek constitutes a very resi threat to the lucal and state accompy.
- inoial raudhers, hunters and other outdoor recreationists would be deprived of reasonable access if Cyprus Bagdad were unable to maintain its road and the Francis Grand pump station. Cyprus Bagdad normally allows public access to Francis and Upper Burlo Cleaks via this rugged back country road.

AMA POSITION:

WSB designation of Francis Creek, Segment 1, is inappropriate for the following resamme:

- 1. Segment 1 is only 34% federal land.
- WSR protection would constitute a totally unnecessary water burden upon the taxpayer, because the perantial flow of Francis Greek is already adequately protected peristing wilderness and Unique Waters Protection
- Most of Segment 1 lacks the required truly "outstandingly remarkable" values. э.
- Cyprum Bagdad's historic in-stream water rights on Francis Creek, while supplying Bagdad with 85% of its community water supply, atili provide for the bulk at the apring discharge to maintain paramalal flow in the lower reaches of Francis Creek. The shains operation pumping system, pipelines and accops road are presidening and land uses incomparible with PBR designation.
- Very high potential for adverse impact upon the town of Baddad, and the economics of Yavanai County.

REVIEW - POTENTIAL PESIGNATION OF GIVE RIVER, GIVE BOX SECRET

DESCRIPTION: Glia Bon Segment: BLM - August Pendemands 11.4 miles as someid and 15.7 as wild. This segment is immediately adjacent to and below theirs Dodge's Morenci mine. Including well fields at Clifton.

ADVERSE ECOSONIC IMPACT:

The Greenles Fublic Lands Committee on March 7, 1993 and fouth their opposition to any further read-listinus on the waters in Greenles County and realizationed their opposition to any actions which would have an adverse impact to the Custom, culture, and economy, of Gruenles County.

An additional layer of restrictions being imposed upon the Gila Box National Conservation area would be a breach of faith by the United States government. Carefully worked out compromises were reached in a management plan and in the legislation establishing that area to the effect that further restrictions would not be added to that or meanby Steam.

Designation of the Gile Bux segment may physically restrict the gree from expansion of Phelps Dodge Morenti mining operations or spende permitting them. The restrict was separation from the properties were separations for the mining operations for tronsfer to Morenti Restrictions to utility easements in this area ore operate.

Nestrictions on the future operations of the Moronci wine would puse significantly adverse consequences upon the size and the local economy. In 1991, Phalps modge Moranci, with amphisyment of almost 2,100 workers, contributed over \$300 million directly to the Arisons securiny, Including 330 million in state and local taxes, \$80 million in perfola and \$200 million in purchases of goods and Asivicas from Arizons supplies. The communities in nursi Greenles and Grahas counties are none to Phelps Dodge supplyees and many of the local businesses supply the mining operation with materials and nervices. Current mining operations that involve sounds, earth movement of visual impairments could be significantly restricted by WSR designation.

This is in an area of the county that is suitable for future development.

IMPACTED COMPANIES AND GROUPS:

- Phoips Oodge's Moreant mining operations withdraws water from upstream walls for the mane and discharges it back into the greak below the mine.
- The municipalities of Clifton and Morenci receive water pumped from upstream wells while reaches and farms use water from the river for irrigation.
- Designation may routrict transfer of water rights from new Mexico to Arizons.

ANA REVIEW - POTENTIAL DESIGNATION OF GILA RIVER. GILA BOX SEGMENT AMA POSITION:

This river segment should be removed from the eliquiditity first for Wild 4 Scenic Rivers due to the following:

- Utility lines, railways, tusdways and deveral highway bridges are visible from the segment.
- Righty m(ners) land sees could be restricted from mineral development and geothermal exploration.
- The BLM land-use plans currently protect 25.4 miles of the river assent.
- The Morenci mine facilities and tailings dam are visible and audible from such of the river curvidur, creating a nightficant impact.
- Diversion at the New Mex) to border for irrigation reduces the flow.
- burning periods of low flow, the consider is used to access public lands.
- The towns of Clifton and Duncan, upstream of this segment have sustained significant damage due to flooding and funding has been approved to modily the river channel immediately upstroam of the segment.

AMA REVIEW - POTESTIAL DESIGNATION OF DILA RIVER MIDDLE SECRESTS

DESCRIPTION: Dile miver Middle Segments 1, 2 & 2: BLN - Agency has recussmented a total of 19.5 miles as recreational and 12.5 miles as while. Segment extends from Coolidge Dam to the East adopt the Assice Ray Complex Lailing ponds.

This segment traverses an area of high mineral potential along the San Carlos Indian Mesarvation boundary. Current and future mining operations could be impacted, which will effect Hayden, Kwatny, Winkelman and the San Carlou indians.

IMPACTED COMPARIES AND GROUPS:

- asarco May Complex provides some 1,500 people with high paying jubs.
- The economic health of the municipalities of Rayden.
 Knessy and Winkelman and the counties of Gils and Final
 is dependent upon the continued operations of America Ray.
- Cyprus's Christmas mine operations envelope both sides of the Glia River. Potential ore grade mineralization occurs on this property within 1/4 mile of the high water lines along the River bank. For the future development of these mopper resources, it is existed that the Middle Soction of the Glia River be declared nun-suitable for WBR designation.

ANA POLITION:

This river segment should be removed from the eligibility list for wild a Scenic Rivers due to the following:

- The water flow is not natural; it is controlled by Coolidge Pam.
- The Needle's Eye Wilderness area encompasses 100% of Sagment 1, and no additional protection is needed.
- Valid water rights have unisted dince 1935 and the land is used for mining, grazing and other public land uses.
- The entire river segment is highly minoralized and should not be limited to recreational use. 4.
- Tailings and also piles are highly visible from segment
- There is significant private ownership in Segment 3. The river crouses two miles of private land in three separate parcels. Only 7 of is miles in segment 3 are public lands.
- Virtually all of the public land on the middle usyment im-uncumbered with fuderal power and water services withdraw).

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AMA REVIEW - POTENTIAL DESIGNATION OF FIGEOR CREEK

DESCRIPTION: Figure Creek: USFS - The agency has recommended 12.5 alies as recreations) and 3.5 males as wild. The septent langes from the Resolution to confidence with the Blue River.

ADVERSE ECONORIC INFACT:

This creek traverses an erea of mostly untested mineral putential sight miles nurth of the Morenci mine identified in success subject in 1261-1. Previous unploration date from an EXXON drilling progrem in the Figure Creek curridor has not yet been acquired. The restriction of weakcurer access within the designated rives couridors in Greenlee County north of Clifton isolate significant access generated by the river berievs. This smalation of public land precludes the development of the land by restricting access for whilities and webicles. This designation would also preclude proceeding with the USFS proposal for a recreational lake which was supported by Phelip Dodgs and the County.

IMPACTED COMPARIES AND GROUPS:

- 1. Phelps bodge Morenci provides 2,100 highly-paid jobs.
- 2. Public utilities provides power to Morenci operations.
- Municipalities of Moranci, Clifton, Duncan and Bafford as wall as Greenies and Graham Counties depend upon high wages of mine workers and tex dollars of the mining operation.
- Cattle grazing, geothernel exploration, water development and siperal prospecting are economically feasible along this river segment.

AMA POSITION:

This river segment should be removed from the eligibility list for Wild & Scenic Rivers due to the following:

- Designated river considers must be fulfiten isolate land with mineral potential surrounded by the river barriers.
- The USFS has proposed a recreational lake and dam which better series the general public and would provide flood control.
- Existing second to multiple-one land cross the river corridor during periods of low river flow. This use will not be allowed it designated.
- 4. Current USPS land-use plans protect the river.

ANA REVIEW - POTENTIAL SESIGNATION OF PINTO CREEK

EXECUTION: Pinto C:wwk: UNFS - Agency has renommended a wegment of approximately 8:8 miles beginning mosth of private property (Layton Ranch) and extending mosth to the lower und of Pinto Box as goessic.

The USFS designation of an "o scenic personnel atream". In Inappropriate. The stream is not personnel at all points nor does it skinish characteristic that would qualify it for a Wild a Scenic Rivers designation. There are various water right mass in quastion and approximately 7t of the land belongs to private andition.

ADVERSE ECONOMIC IMPACT:

Designation under MSRA would have a major impact in the area with regard to exacting and fature mining activities and cettle operations that support the local communities. A parenture element of the Magnar-Pieto Velley mining operations and since cettle ranching could easily result in an estimated local of some 400-500 john. Many indirect john would additionally be lost in the local communities that support the akining and ranching adduction. The 1907 expenditures in Arizons for the Pinto Valley operations alone exceeded \$77 mailtion.

IMPACTED COMPANIES AND GROUPS:

 Magma Copper Company - Pinto Valley Mining Division. Magma has owned and operated its Pinto Valley mins since acquiring the facilities in 1987. This facility lies approximately 2 miles upgradient from the proposed stream acquant. The tailings improvedment is in definite visual proximity to the stream. Planned future expansion of low yads over the tailings impoundments may have even greater visual impacts on the stream sagment.

Nagma's water rights in the area include aix known wells upgradient of the proposed exciton which pusp approximately 1,250 gpm at the passent time. The State of Arizona siso has identified three other instream rights in the size that belong to Magma but an of this time are not utilized.

- Salt River Project (SRP). SRP provides power to Hogne and all of the Kurrnunding area. Lest year Magma purchased 431,041,981 klowatte of power from SRP.
- Froposed Carlotta Mine would employ 200-250 people.
- Cattle Ranching. There are currently 2 ongoing cettle ranching/grazing operations up or within close proximity of the stream negment.
- Arisona Gold Prospectors Club. This club frequents Pinto Crenk on its outings and controls meny mining claims within the proposal asymmet.

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ANA REVIEW - POTESTIAL DESIGNATION OF PINTO CREEK

IMPACTED COMPANIES AND GROUPS; Continued

 The towns of Mismi/Globe lin five to tun miles mast of the Pinto Valley operations. The municipality would be affected significantly by the loss of mining and ranching jobs.

ANA POSITION:

This river segment should be removed from the eligibility list for Wild & Scenic Rivers due to the following:

- Extreme adverse economic impacts on the local and implomal areas due to the impacts on at least mix separate economic activities.
- 2. Hajor familithion already in place and operating.
- Historic instrume water rights could result in precenciable use conflicts.
- 4. Soven percent private land.
- uses criteria for "perennial" is inappropriate (or the entire segment.
- Contention that this segment does not meet the characteristics of heeing truly "outstanding remarkable" value.

AMA REVIEW - POTENTIAL DESIGNATION OF UPPER SALT RIVER

DESCRIPTION: Upper East River: USFS - Agency has recommended wild for 32 miles and accold to 15 miles. The segment flowy through San Carlos and Fort Apacha Ragarvoirs, two wilderheas areas and ends at Highway 288 bridge.

These segments are down stream from Phelps Sodge Black Raves pump station and Show Low Loke transboain diversion. Waters from these tacilities are used in mining, beneficiation, and smulting of coppes orax at Cypius Miahal and Phelps Dodge Morence mining operations and as domestic water supply for the Morence community.

ADVERSE ECONOMIC IMPACT:

Best ECOMONIC INFACT:

Designation under the WSF Act would have a major impact in the area due to adverse effects on spiring and future mining. Since them is due to adverse effects on spiring and future mining. Since them is due to adverse effects on the river. Several large minon and numerous prospects control to the river. Several large minon and numerous prospects control to the river. Several large minon and the several large minon and several large minon prospects are known from the Salt River district in the upper reaches of the river segment. The Apache Mino on the river control of produced several hundred tons of manganese ore from a brectia body which also contains copper. Additionally more than 30 usualus occutances have been identified northwest of the Salt River segments.

Newtrictions on the future operations of the Morenni mine would pose significantly adverse consequences upon the mine and the local economy. In 1991, Phelps Dodge Morenci, with employment of a)must 2,100 workers, contributed over \$300 million directly to the Arizona economy, including \$30 million in state and local temes, \$80 million in payrall and \$205 million in purchasing of goods and survives from Arizona mapple in a purchasing of goods and survives from Arizona mapple in a formation of problem of goods and survives from Arizona mapple in a formation of problem of the survive of t

Exploiation and development of resources near the river corridor will be prohibited if they impact the river scenic values.

IMPACTED COMPANIAS AND GROUPS:

- 1. Phelps Bodge Morenci employs 2,100 workers.
- 2. Cyprus Missis Missis Corporation employs some 1.000 Workers.

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AMA REVIEW : POTESTIAL DESIGNATION OF UPPER GALT RIVER

IMPACTED COMPARIES AND GROUPSI, continued

- 3. Utility companies serving the mining operations.
- The municipalities of Clifton, Duncon, Moranci, Sefford, Globe, end Mismi: as well as the affected counties.

ANA POSITION:

This gives segment whould be removed from the eligibility lint for wild a Scenic Rivers due to the following:

- Designation would conflict with existing water rights and WDARF with sectivities.
- Existing protection by wilderness designation and uses land une-plans protect 31.9 miles of the river.
- Segments through indian lands are managed by the Apache Tribe through a use permit policy that prevents overness and protects wildlife and natural scenic values.
- Economic hardship would be created on no less than six municipalities in rural Arizona.

AMA REVIEW - POTESTIAL DESIGNATION OF LOWER SAN FRANCISCO RIVER

DESCRIPTION: Lower San Francisco River: BLM - Agency recommends recreational designation for five miles, and wild for three miles.

This segment is immediately adjacent to and Delow Phelps Dodge Morenci mine including well finide at clifton.

ADVERSE ECONOMIC IMPACT:

Designation will physically restrict utility desements and impade expansion of current mining operations at Phelps Dodge

The Senate of the State of Arizona, in Memorial No. 1006, pained in March 1980 requested: That the Congress of the United States reject, in its final consideration, the United States reject, in its final consideration, the Inclusion of any portion of the . San Franciene River's march of the Wild and Scenic Mivers System it the local citizens as attougly opposed to such designation. Restriction of mineral prospecting, cattle greating, gaschermal exploration, and water development will occur in the designation limits accesses and development or impedes pecultary of these projects.

davelopment or impedes psentting of these projects. In 1981 the USFS recommended against designation of the river. The RIS states that lack of local support for the proposal was a reason for not designating the river. Also noted in the RIS states concerns for the local support for the proposal was a reason for not designating the river. Also noted in the RIS state of the control of the proposal of mineral dupowits were restricted. The Grandles public Lands Committee on Merch 2, 1943, regarding the proposal Wild end Scunic Mivers, stated they are "opposed wild end Scunic Mivers, stated they are "opposed any further restrictions on the matern in disentee County." and "restfirm | their | opposation to any actions which will have an advance impact to the owner, miners, and accommy of Greenlee County." Continued consideration of another layer of content of the county of the mineral county of the county of the mineral county of the county of the Morgania sine

Would not be added to that also is meanly also.

Restrictions on the future operations of the Morency mine would pose algoriticantly adverse consequences upon the mine and the local engages. In 1991, Phalpa Bodge Morenci, with employeem of almost 2,100 workers, montributed over 5:00 million directly to the Aciona sconcay, including 530 million in patter and lucal taxes, 580 million in payroll and 5205 million in purchases of goods and services from Aritona suppliers. The occamulties in rural Greenles and Grahes counties are home to Pholpa Bodge amployees and many of the local businesses supply the Mining operation with saterials and sorvices. Current siming operations that involve wounds, each suvesent or Visual impairments could be significently restricted by WSR designation.

ANA REVIEW - POTENTIAL PESIGNATION OF LOWER BAN FRANCISCO RIVER, CONTINUED

- Phaips Dodge Moresoi, employer of 2,100 highly-paid workers.
- Public utilities univing the mining facility and local communities.
- Residents of rural communities and cattle growers and ranchers.

AHA POSITION:

This river segment abould be removed from the eligibility list for wild a Scenic Rivers due to the following:

- The morence laceleting create mignificant visual and audible impacts on the river corridor and planned expansion of those facilities will increase that impact.
- Water is pumped from wells adjacent to the river for use by the toun of clifton and for mining operations. Water from Chaek Creek, a tributery of the East Practico River, is diverted by the mining operations and discharged into the creek above the confluence with the Tiver.
- Approximately 23% of the untils river is private industrial property.
- BLM land use plans currently protect 5.2 miles of the niver.

ANA REVIEW - POTENTIAL DESIGNATION OF SAN PRANCISCO RIVER

DESCRIPTION: Sen Prescisco River: USFS - Agency Yacommonds nine miles as welld, and thirteen miles as recreational.

ADVERSE ECONOMIC IMPACT:

This segment was evaluated by the USFS in 1981 With a recommendation against designation of the river. The KIS states that "current meanagement plane provide for regulation of volucias use and for whichlife protection during critical reproduction periods." The KIS slow makes that lack of local reproduction periods. The KIS slow makes that lack of local support for the proposal was a reason for not designating the river. This is not designating the river. The local supports of the state of Arizon was the state of Arizon was the state of Arizon was the state of the river of the state of the state of the river of the state o

Mestiniciting on the fitture operations of the Morenci mine would pose significantly adverse consequences upon the mine and the local economy. In 1991, Pheips Prode Morenci, With employment of alsout 2,100 workers, contributed over \$300 million directly to the Arizona economy, including \$30 million in state and long taxam, \$80 million in payroll and \$205 million in purchases of quote and services from Arizona explicits. The communition in tural Grawates and Graham counties are home to Pheipu Dodes employment and decided and services. Current maning operations that involve sounds, each novement or visual impairments could be significantly verticated by WSR designation.

IMPACTED COMPANIES AND GROUPS!

- Phaips bodgs Moreaci mining operations with employment of 2,100 highly skilled, highly-paid workers.
- $\mbox{{\tt public}}$ utilities warving the mining operation and rursl communition.
-). Residence of Clifton, Duncan, Saiford and Horenoi.
- 4. Ranchers along the river conrider.

29

27

AMA REVIEW - COTSETIAL DESIGNATION OF EAST FRANCISCO RIVER

This river sugment should be removed from the eligibility list for Wild 6 Scenic Rivers due to the following:

- The river corridor is the location of an alternate state highway reroute.
- The designation may impede expansion of current mining operations.
- The URFS land-use plans protect 19.5 miles of the river-Special road closures protect wildlife and natural scenic values.
- During periods of low river flow, public lands are accessed through the river corridor.
- b. The arizons Senete passed Memorial No. 100a in 1980 requesting that the U.S. Congress reject inclusion of any portion of the Sen Franciscon River an part of the Wild and Scenis Rivers System if the local residents are atrongly opposed to such designation.
- 6. The Greenise Public Lands Committee on Merch 2, 1993, requrding proposed wild and Scenic Rivers, states they are "opposed to any further restrictions on the water in Greenise County." and "restfire [their] opposition to any actions which will have an adverse impact to the mustom, culture, and economy of Greenise County."

ANA REVIEW . PRINCETTAL DESIGNATION OF MAR PROPORTIVER

DESCRIPTION: Ran Pedro River: BLM - Agency recommends all 45 miles as recreational. The San Pedro River segment attends from the international border with Hexico to the town of \$t. Devid.

Existing BLM land-use plane protect 38.3 miles of the river including 19 miles of Matienal Riparian Conservation Area. Two sequents of the river are size included in e Matienal Riparian Conservation area of Critical Environmental Concern. The finel southernmost two miles of the river, at the border with Rexico, have putential for industrial development.

ADVEREZ ECDEÓNIC IMPACT:

The San Poulo River proposed segment is already afforded the special management and restricted use protection as a MRCA. This area is the hise downstream from Phelps Dodge's Bisbee mining operations on Greenbush Drew. While no impact upon the Bisbee mpraction or the Apacha bowder plant in Benson is anticipated, there is potential for industrial development at the international border with newloo. WSR designation for the final two males is undesirable.

IMPACTED COMPANIES AND GROUPS:

- 1. Fotestiel mining expension upstream.
- Potential industrial development at the internetional border.

AMA FORITION:

This river segment should be removed from the eligibility list for Wild & Scenic Rivers due to the following:

- Visual impacts of development of mineral resources on adjacent public and private lands are inconsistent with a scenic designation.
- 2. Expansion of existing mining facilities could be impeded.
- Potential for industrial development adjacent to the international border with Mexico could be impeded.
- Weter quality from Maximo does not have truly "outstanding" hydrologic quality.
- Existing BLM land-use plans currently protect 38.3 miles of the river and no further protection is warrented.

32

AMA REVIEW. POTENTIAL DESIGNATION OF SANTA MARIA RIVER. SECRET S DESCRIPTION: Sents Maria River: SLM - Agency recummends 14 miles as scent.

Sauta Maria River, BIM Sugment B, is a fourteen-mile socition of the Sante Maria River from the bridge on U.S. highway 93 upstream to a point about two miles upstream from the bridge on State Highway We. This segment down not meat the basic critoria for WRR designation, being predominantly private land with only 20% administered by the federal government.

Frequent high magnitude flooding has repeatedly ravaged the boulder stream channel, dentroying most of the mature riperian wegstation. A county graded road provides access to some thirty residences along the proposed MSE corridor.

ADVERSE ECONOMIC INFACT:

Significant potential exists for adverce local scouncid impacts, primarily to twenty or so property owners along this proposed MSS Segment D. Roth the State of Arizona and Cyprus Baguda Coppes Coxporation have sand and gravel barrow pits within the corridor that are used periodically for construction and road surfacing.

IMPACTED COMPANIES AND GROUPS:

- Cyprus Bagdad Copper Corporation employs 630 highly-paid workers in a rural community of 2,500 people.
- Homeowners on the Santa Naria who are primarily sogned in Yanching and cettle growing.
- State of Arizona has sand and gravel pits along the river corridor used for road construction.

AMA POSITION:

This river segment should be removed from the eligibility list for wild a Scanic Rivers due to the following reasons:

- There are no truly "outstandingly remarkable" values along this segment of the Santa Maria River.
- 2. The Santa Maria is a large intermittent stream.
- The federal lend position is minor, with only 70% being public lands.
- Designation would cause adverse impacts to local residents, preprial laws of resources to the Africon Deportment of Tennportation and Cyprus Bagdad, as well as diminishing real estate values of State Trust Lands.

AMA REVIEW - POTENTIAL DESIGNATION OF MARDINE CREEK, SECONDET 1

DESCRIPTION: Serdine Creek: USFS - All 9 Alles recommended by agency as seasic.

This area is 4 miles north of Phelps Dodge Morenci mining operation, traversing untessed mineral potentials striking to the northeast from the mine. The area has several small miningal prospects. Restriction of vehicular access within the designated river coordinute in Graenlese County north of Clifton inclate significant acreage surrounded by the river barriary. This isolation of public land precludes the development of the land by restricting access for utilities and vehicles.

ADVERSE SCOMONIC INPACT:

Musticitious on the future operations of the Morumoi sine would pose significantly adverse consequences upon the mine and the local economy. In 1991, Pheips Dodge Moremi, with employment of almost 2.100 workers, contributed over \$300 million discretive the Arizona economy, including \$300 million in state and local taxes, \$800 million in payroll and \$200 million in purchases of goods and services from Arizona suppliers. An example of the suppliers are the suppliers of the suppli

access to the area for cattle growers and quotiesmal explorationists would be affected by WSR designation.

IMPACTED COMPARIES AND GROUPS;

- 1. Phelps Dodge Morenei mining operations.
- Rural communities of Clifton, puncan, Mafford and Moranci would be impacted by loss of jubs or restricted expansion of current operations.

ANA POSITION

WSR designation of Segment 1, Sardine Crook, is inappropriate for the following rescons:

- Descipation of the river as scenic, within the proximity of the Morenci mine would cause restrictions of mining operations and could cause stoppage of expansion for future operations.
- Existing access routes to multiple-use land cross the atream corrydor; this was would be incompatible with the designation of the river.
- 3. Approximately 11 percent of the river is private land.
- The current USFS land-one plans adequately protect the tiver.

34

13

AMA REVIEW - POTENTIAL PRESSRATION OF ANCAHORE CREEK, ARCHEST 1

<u>DESCRIPTION:</u> Symmory Crack: USFS - All 4 miles recommended by agency as wild.

This segment extends from Pareons Springs to confluence of the Verde River. It includes springs which provide a portion of the water rights at the 18° area Packard Ranch owned by Phelps Dodge Corporation.

ABVEREY ECONOMIC IMPACT:

The potential development for sole of property will be limited by designation. Existing roads and utilities within the corridor are used for access to a 110-acre ranch which has been zoned for housing.

IMPACTED COMPANIES AND GROUPS:

1. Phelps Dodge Corporation: Packard Ranch

ANA POSITION:

This river segment should be removed from the eligibility list for wild a Scenic Rivers due to the following:

- existing USFS land-use plant protect 3.5 miles of the river, including 3 miles of wilderness. No further protection is warranted.
- pevelopment plans for the privately-memod issuacta tenth could be severely instituted even though currently somed for residential use.
- existing roads and utilities within the corridor are used for access to the ranch.

ANA REVIEW - POTENTIAL DESIGNATION OF UPPER VEADE RIVER

<u>Damenterios</u>: Upper Verde River: USFS - Agency recommends to miles as recreational.

The segment in dispute is the lower 25 milan from Crindstone weak. This area extends above the 139-acre Packard Ranch owned by Phelpa Dodge Corporation and could restrict water rights to the property.

AUVERAL SCONONIC INFACT:

The potential development for sale of property will be limited by designation. Existing foods and utilities within the corridor are used for secume to the property. The development and continued use of the railroad could be lapeded by the designation and is integral to future development.

IMPACTED COMPANIES AND BROUPS:

1. Phelps Dodge Corporation, Packard Ranch

ANA POSITIONA

- This segment was evaluated by the USFS in 1981 with a recommendation against designation of the river.
- The State of Arizona passed Memorial Mg. 1006 in March, 1980. Which opposes any designation without local support.
- Existing USYS land-use plans protect 29 miles of the river.
- 4. The land is currently round for residential use.

36

ANA REVIEW - POTENTIAL DESIGNATION OF MAST VERDE BIVER, SECRETA 2

DESCRIPTION: East Verde River segments 2 & 3: USF2 - Agency recommends 12.7 miles on acesic and 19.9 miles as repressional.

Thuse sequents are down atream from the sluc Ridge addition to the river and the quaerating plant at the headwaters of the East verde River. Designation of the river could interfere with continued operation of transbesin vater diversions and downlopment.

ADVERSE ECONOMIC IMPACT:

The operation of the Horenci minu depends upon the water credits applied to the Vorde River transferred from the East Clear Creek Opposituation to modify diversions and improve quaranting facilities will disappear if the river is desagnated. The stae Bouth of segment 2 of the river has numerous small bese metal aimed and prospects. The development of these properties will be restricted by the designation of the river.

General Colors in the fiver.

Restrictions on the future operations of the Morenci mine would pose significantly adverse consequences upon the sine and the local economy. In 1991, Phelip Bodge Morenci, with supplyment of almost 2,100 workers, contributed over 5300 million directly to the Arrence economy, including 330 million directly to the Arrence economy, including 330 million in purchases of goods and services from Arrivors mulphiars. The occamulties in cural Graenles and Graham counties are home to Phelips bodge employees and samy of the local businesses supply the maning operation with materials and services. Current mining operation with materials and services. Current mining operations that involve acounts, users more descriptions. Current mining operations that involve acounts, such movement or viewal impairments could be significantly restricted by MSR designation.

IMPACTED COMPARIES AND GROUPS:

- Phelps Dodge's Morenci operations employs 2,106 highlypaid, highly-ukilled workers.
- utility companies serving the mining operation and local communities.
- Rural communities of Clifton, Satisfied, puncan and Material.

ANA POSITION:

WSR designation of Kest Verde River, Sequents 2 and $\tau_{\rm c}$ is inappropriate for the following ressum:

 Water flow in augmented by Phelps Dodge B)us Ridge transfer from East Clust Crask. ANA REVIEW - POTENTIAL DESIGNATION OF EAST VERDE RIVER. SEGMENTS 2 AND 2

ANA POSITION:, continued

- Modification to diversions and improvement to generating facilities will not be permitted if the river is designated.
- Decignation could interfere with interbasin water transfer.
- The area wouth of segment 2 has high mineral potential and economic development would be prohibited.
- Examiny wilderness and USFS land-use plans adequately protect 32.6 miles of the river, of which 12.6 miles is wilderness.

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THE MORENCI WATER AND ELECTRIC COMPANY

P. D. Bas 58

MORENCI, ARIZONA 85540

June 27, 1994

Mr. Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3707 North 7th Street P. O. Box 1653 Phoenix, Arizone 85011

Re: Comments on Arizona Statewide Wild & Scenic Rivers Draft

Dear Mr. Moreland:

These comments are submitted on behalf of Morenci Water and Electric Co. (MWEC), a subsidiary of Phelps Dodge Morenci, Inc. (PDMI). I appreciate the opportunity to comment on the Draft Arizona Statewide Wild & Scenic Rivers Legislative Environmental Impact Statement (LEIS).

MWEC is the domestic, municipal, and commercial water provider for the towns of Clifton and Morenoi, and for the Morenoi Mine complex. We have water rights and land holdings on the San Francisco River and Eagle Creek, tributaries to the Gila River. We receive water from both of these sources.

We believe two of the study areas included the alternatives analyses would have significant adverse impacts on MWEC if they are selected for inclusion in the Wild & Scenic River System. These proposed river systems are: 1) Glia Box: Lower San Francisco River, and 2) Glia Box: Gila River. The specific issues of concern are water rights, local property taxes, and CAP water use.

The protection and use of water rights are extremely sensitive and controversial issues when associated with hew regulatory programs proposed by the Federal government, such as wild & Scenic River System designations. Any impact on HMEC's water rights because of a wild & Scenic River System designation of either of those two study areas, will significantly impact our business assets and activities. Although the Draft LEIS states that water rights associated with existing beneficial uses will not be reduced, it does state that minimum instream flows will be established for river study areas designated as part of the Wild Scenic River System. Neither of these statements addresses the

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UNIT OF PRELPS DODGE WINING COMPANY

fact that water rights claims are currently being adjudicated in Arizona and the fact that existing beneficial uses might be

being adjudicated.

45-2

On the subject of property taxes, the Draft L2IS indicates that private land and water rights within river study areas identified as suitable for designation in the Wild & Scenic River System, would be acquired. We share the concern of local community leaders from Greenlee County and other rural counties, which have a very small private land base for which to collect property taxes, that purchase or these private land holdings by the Federal government would further reduce the ability of local governments to provide services. Please explain how local county governments will not be adversely affected by the reduction of private land holdings and the associated property tax base within their boundary, without having to increase the property tax on individuals and businesses.

45-3

Finally, there is the issue of using CAP water in rural areas through water exchanges. Please emplain how rural areas such as Clifton and Horenci would participate in the exchange mechanisms envisioned in the CAP system, if we are faced with minimum instream flows that would have a priority right over exchange water.

In summary, WWEC has significant concerns regarding the designation of the Lower San Francisco River as suitable for inclusion in the Wild & Scenic Rivers System. Such a designation will have an adverse impact on MWEC because our current diversions from this river, above the study area, may be precluded from expansion. An expansion of this diversion could be accomplished within the current water rights of MVEC. Therefore, MWEC supports the No Action Alternative for the Lower San Francisco River.

Regarding the Gila Box: Gila River segment, PDMI worked with the BLM during the development of the Gila Box National Riparian Conservation Area, and supported the agency in obtaining this management designation. In doing so, PDMI maintained its

Response 45 - 1: Please refer to general response # 4 (Federal and State Water Rights).

Response 45 - 2: Please refer to general response # 6 (Land Acquisition).

Response 45 - 3: A discussion of the use of Central Arizona Project water is beyond the scope of this document. Please see general response # 4 (Federal and State Water Rights).

Response 45 - 4: Please refer to general response # 1 (Alternatives).

opposition to potential multiple management regulations of this resource. In view of the fact that designating the Gila Box National Riparian Conservation Area as a Wild & Scanic River would provide no benefits in terms of management of the resource, MWEC supports the No Action Alternative for this river study area.

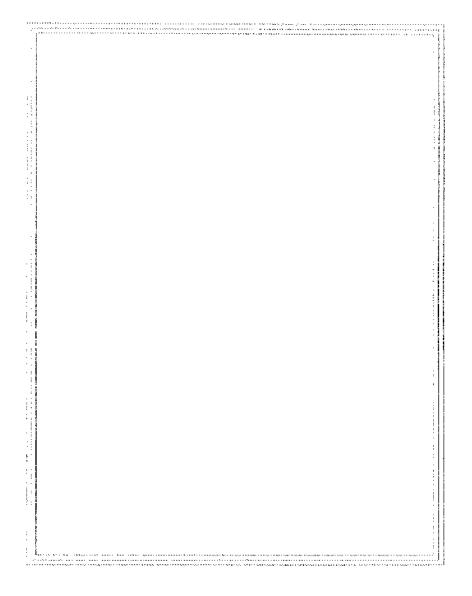
Thank you for the apportunity to be involved in this most important decision process. Please feel free to contact MYEC at any time regarding issues associated with the Draft LEIS or any other issues.

Sincerely,

D. H. Thornton

Vice-President, Worenci Water and Blactric, Co.

c: D. C. Nelson, Executive Vice-President Arizona Rural Water Association



000047

ARIZONA STATE ASSOCIATION OF 4 WHEEL DRIVE CLUBS

P.D. 80X 23904 TEMPE, AZ 86266 (602) 230-48Y4 FAX: 402 641 1444

June 1994

Wild and Scenic Rivers Project Arizona State Office Bureau of Land Management 3707 N. 7th Street P.O. Box 18563 Phoenix, AZ 85011

RE: WILD and SCENIC RIVERS

ATTENTION: Phillip Moreland

Dear Mr. Moreland;

In response to the "Wild and Scenic Rivers Study - Issues and Concerns" I am addressing the following concerns and suggestions.

The Arizona State Association of 4-Wheel Drive Clubs, Inc., (ASA4WDC) does not support an Arizona Wild and Scenic Rivers Bill. The delegates of ASA4WDC urgs the members of Arizona Congressional Delegation not to introduce, vote, or pass such a bill.

Our goar is to minimize the river crossings and remote access potentially lost with a Witd and Scenic Rivers proposal by BLM, the Forest Service and Arizona Rivers Coatition.

The Wild and Scenic Rivers Bill, if passed as proposed, will restrict or eliminate many forms of recreation and enjoyment for several major use groups. Some river section proposals will eliminate some older, physically challenged, and small children from enjoying remote access. We are not tooking for new roads, but we need a reasonable guarantee existing opportunities will remain.

47-1 The ASA4WDC views a Wild and Scenic Rivers Bill as just more wilderness. Many designated rivers are within existing wilderness boundaries. How much wilderness is enough? It is clear now the Wilderness Movement was started to preserve areas for





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Response 47 - 1: Comparative information on the management of wild, scenic, and recreational segments of wild and scenic rivers is provided on page 10 of the draft Statewide Legislative Wild and Scenic Rivers Environmental Impact Statement. In addition, please refer to general response # 9 (River Study Area Protection). future generations to view untouched areas. But a select few, abte bodied, mostly younger people in the name of preservation have developed our wildemesses into back country play areas. The designated wildernesses are now over run with users to the point of destroying the very reason they were designated for.... Preservation. By disturbing plant and animal habitat when building elaborate trail systems not natural to a wilderness, it's driving wildfile from the very areas that congress set aside for their protection.

The same thing is in store for our rivers if a bill is passed. More people will be drawn to these areas with a result of more environmental damage. If left alone with no designation their names will not be advertised and less damage may occur.

What's next after the Wild and Scenic Rivers Bill? The Mexican Wolf? People just think the ranchers are paranoid about losing a few cows. That's a minor problem compared to the overall long term effect. The wolves will be released in protected areas like wildernesses and driven out by loo many users. Next they will need larger habitat to move around in grazing, mining, and access by the motorized public will need to be reduced. Since they are already an endangered species they receive larger and larger areas to roam with green belt areas to move from one wilderness to another. Some things are better left atone. By introducing wolves, building new trails, reconstructing and grooming old trails in wildernesses for more people is not preservation nor a legacy to our grandchildren.

I would like to make it perfectly clear the ASA4WDC is not opposed to preserving for the future but do not remove opportunities from the majority to benefit a few in the name of preservation. Preserving and protecting areas like wilderness only compounds its usage and destroys its serenity.

Keep in mind that without additional congressional funding and budget cuts of both agencies, imanagement and protection of these restricted areas may be difficult at best.

We strongly urge the Arizona Congressional Delegation to take a "no action" approach to the Wild and Scenic Rivers Bill.

Having said all that and if a Wild and Scenic Rivers Bill is inevitable, then we would like to make some concessions. Myself and Jess Chinn, the Land Use Representatives of the ASA4WDC have had several meetings with Gail Peters and Pam Hyde from Aziona Rivers Coalition over the past several months. The meetings were to reach an agreement on the river or stream segments that have been studied by BLM, the Forest Service, and proposed by Azizona Rivers Coalition for designation as wild, scenic, or recreational rivers. Many concessions and changes were made by both ARC and ASA4WDC. Both organizations have come up with a workable proposal that we both can live with. At this point we have reached agreement on most of the river or stream segments.

Both groups together have looked at all the rivers and all segments proposed by ARC and studied by the Forest Service and BLM. We have discussed segment end points and lengths, classifications, and corridor boundaries. Some rivers and designations ASA4WDC had no position due to lack of time to gather information.

Representing the ASA4WDC and accompanied by other members, I have personally explored and researched the following BLM rivers since the first public involvement meeting in Payson on January 9, 1993:

Virgin River Paria River Gila River Arauaipa Creek Turkey Creek Gila Creek (Gila Box) Swamp Springs Canyon Hot Springs Carryon Clenaga Creek San Pedro Creek

Bonita Creek

Other rivers I explored and researched before January 9, 1993 are as follows:

Francis Creek Santa Maria River Burro Creek Hassayampa River

Santa Maria River Agua Fria River

Attached are lists of both BLM and Forest Service studies of river or stream segments on which ASA4WDC and ARC agree on designation and the classification. Some segments we partially or conditionally agree if concessions can be made by either group, and some on which we disagree. Short explanations of the disagreement follow each item. Some segment designations need to be changed or moved to protect the integrity of existing recreational accesses. Working with ARC to agree on these changes should not be viewed as a compromise to ASA4WDC's position on "No Wild and Scenic Rivers Bill".

We need to ask ourselves if a Wild and Scenic Rivers Bill is desired or even needed by the majority of the people of Arizona.

Sincerely.

Land Use Chairman, ASA4WDC

ASA4WDC and ARC AGREE

NOTE. The following was agreed to and signed as noted below but the asterick noted rivers indicate segments and or designations to be changed from proposal of ARC. Forest Service, or BLM and are agreed to by ASA4WDC and ARC. Although these rivers were not specifically noted at the time of agreement it was understood by both names.

Chevelon Canyon
Willow Springs Canyon/Woods Canyon
West Fork Little Colorado River
South Fork Little Colorado River
East Clear Creek
Barbershop Canyon
Leonard Canyon
Campaign Creek
Coon Creek
Oak Creek
West Fork Oak Creek
West Bayer Creek

Oak Creek
West Fork Oak Creek
West Beaver Creek
Upper Verde River
Verde River
East Verde
Blue River
Chitty Creek
Eagle Creek
Cave Creek
Hassayampa River
Buehman Creek
Ash Creek (Persence)
Virgin River
Paria River

Bill Williams River Middle Gila River

Aravaipa Creek

Cienega Greek

Lower Salt River

Upper Sall River (Ser River Cenyon)

- * Santa Maria anewang Communicad Crisis mough Sycamore Crisis)
- * East Fork Little Colorado River
- * West Fork Black River
- * Cherry Creek * Pinto Creek
- * Sycamore Creek www.
- * West Clear Creek
- * Francis Creek
- *Redfield Canyor/Swamp Springs
- * Kanab Creek

Original signed January 27, 1994 by: ASAMVDC by Gary Keder ARC by Gail Peters

ASA4WDC HAS NO POSITION AT THIS TIME ON ARC PROPOSED SEGMENTS

Pigeon Creek San Francisco River

ASA4WDC will support whatever C.B. Fletcher, of Safford, proposes. ASA4WDC has no knowledge of accesses to these rivers.

ASA4WDC AND ARC PARTIALLY OR CONDITIONALLY AGREE

East Fork Black River Black River (mainstem) San Pedro River Burro Creek Tonto Creek

 Segment and designations to be changed by ARC to ASA4WDC proposals or ASA4WDC will not agree. We will not budge on these rivers.

ASA4WDC DISAGREES WITH ARC PROPOSAL

Fish Creek: ASA4WDC opposes any designation.

Lower San Francisco River: ASA4WDC opposes any designation.

Gila Box: ASA4WDC opposes any designation.
*Leave as is with restricted vehicle recreation allowed.

Bonita Creek: ARC wants a segment from the San Carlos Reservation to Lee Trail Road to be classified as Scenic; ASA4WDC wants the entire length of Bonita Creek from the Reservation to the Gila River to be classified as Recreational.

Salome Creek: ASA4WDC wants to begin designation at Little Turkey Creek; ARC wants to begin at the confluence of Salome and Turkey Creeks.

Agua Fria River: ASA4WDC wants to extend ARC's upper Scenic segment approximately 2 miles further downstream; ASA4WDC also wants approximately 4 miles of the end of ARC's lower Wild segment to be separated out into a new segment to be classified as Recreational.

Bass Canyon/Hot Springs Canyon: ASA4W/DC opposes any designation.

ASA4WDC

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ARIZONA STATE ASSOCIATION OF A WHEEL DRIVE CHIRC

P.O. BOX 23904 TEMPE, AZ 26266 NO2) 232-1874 FAX: 402 641 6464

June 1994

Wild and Scenic Rivers Project Arizona State Office Bureau of Land Management 3707 N. 7th Street P.O.Box 16563 Phoenix, AZ 85011

RE: WILD and SCENIC RIVERS QUESTIONS SURVEY

ATTENTION: Philip Moreland

Dear Mr. Moreland,

48-1

In response to your question survey form, "DO YOU HAVE A QUESTION ABOUT WILD AND SCENIC RIVERS?" the ASA4WDC would like to adcress several of their concerns.

- 1 Would existing river crossings open now to off-highway vehicles, be left open when the river is designated wild? Specifically noting the crossings and rivers in question are:
 - Upper Burro Creak: Crossings in sections 28, 32, and 33 and access points in sections 22, 31, and two places in 30. On quad map, Burro Man;
 - Santa Maria River: Numerous crossings on the wild section proposed by Arizona River Coalition.
 - c Agua Fria River: One crossing and one access in sections 17, 18, 19, 20 and 30 on Joes Hill quad. Not including the Bloody Basin Road.

Access by the rancher is also used in the lower end with an existing road into the wild designated



Response 48 - 1: The survey form to which you refer was distributed during the period when the Bureau of Land Management suitability assessment reports were prepared (February - September, 1993). Please refer to general response # 11 (Suitability Determinations).

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- d Lower San Francisco River, Gila River (Gila Box), and Bonita Creek.
- ← Hol Springs Canyon
- 1 Bass Canyon
- q Cienega Creek
- Hassayampa River: Section proposed by ARC as wild.
- Will we have clarification of the definition/identification of 'roads' relative to identification of a Wild and/or Scenic River.
- 3 Is the Wild and Scenic River process a one-time-only project, or will it be a continuing project?

As stated previously the ASA4WDC does not support an Arizona Wild and Scenic Rivers Bill but they do have concerns and look forward to receiving answers to some of the major issues.

Sincerely,

-Gary Keller - ASA4WDC Land Use Chairman STEEL STORY

ASA4WDC

ARIZONA STATE ASSOCIATION OF 4 WHEEL DRIVE CLUBS

P.O. BOX 23984 TEMPE, AZ 15285 (602) 258 48 Y4 FAX: 602 641 6464

CONCERNS OF ORGANIZED 4-WHEEL DRIVE CLUBS, RELATIVE TO LAND USE IN GENERAL AND TO "WILD AND SCENIC RIVERS" IN PARTICULAR

Intro: The Arizona State Association of 4-Wheel Drive Clubs, Inc. (aka ASA4WDC) is an association of rough-terrain vehicle (i.e., 4WD) clubs with the following goals: to promote a responsible attitude lowards the vehicle use of public lands, to prevent tegislation which would impose undue restrictions on recreational 4-wheeling, to institute programs of conservation, education, and safety, and to provide social and recreational activities for its members. The ASA4WDC also assists state and federal land resource management agencies?

- We are for conservation of, and protection of, the environment.
- We are for preserving existing wilderness areas on public lands.
- We are for preserving existing non-wilderness areas on public lands.
- We are for preserving a reasonable amount of the existing roads on public lands. We do not advocate construction of new roads
- > We are for responsible use of land, and for environmental education.
- We support the Tread Lightly program.
- Our primary recreational activity is 4-wheeling on existing roads on public lands. This
 usually is accompanied by a variety of secondary recreational activities, such as camping,
 hiking, bicycling, etc.

Specific Concerns Related to the Wild and Scenic Rivers:

- Insure that the decision of process adequately provides for public input, by widely
 publicizing, and by allowing ampte response time to allow the various user groups to
 physically visit the fiver sites and make their assessments and recommendations.
- Identification of Wild and Scenic Rivers should address all user groups, not just a select group that might be more vocal than the others. To insure equal representation from all major user groups, we suggest setting up a user advisory board to make recommendations to the various land management agencies regarding suitability of the proposed fivers. Suggest two representatives from each major user groups. 4-wheelers, inkers and backpackers; mountain bioyelasts; equestrians; motor cyclists; ATV riders; miners; ranchers, and the timber industry.
- The decision process should give weight to the size of the various user groups, rather than
 to which group is the most vocal.





- Some type of appeal or request-for-review process should be in place, in case the public's recreational needs change in the future
- Need classification of the definition/identification of "roads" retailive to identification of a Wild and/or Scenic River.
- Is the Wild and Scenic River process a one-time-only project, or will it be a continuing project?

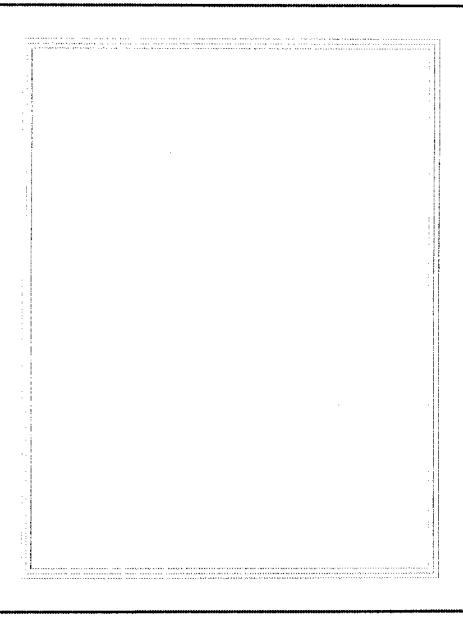
General Concerns of the ASA4WDC:

- The continually decreasing size of available area for our recreational activities, due
 primarily to road closures on public lands and to the ever-increasing amount of wilderness
 designation of public lands.
- Being overpowered on the above issues by conservation and environmental extremists.
 Off-highway vehicle users represent a larger segment of the recreational user population,
 but the conservation extremists are more isolay to be heard by tegislators because they are
 more vocal, more heavily financed, better organized, and because the general perception
 is that they have a more poficially correct stance.
- Obtaining more funding for the public land agencies (F.S. and BLM) to implement maintenance of land for our recreational activities.
- Land agencies need to fisten to a wider variety of recreational user groups rather than a select tew, since recreation is fast becoming the largest use of public lands, surpassing timber, grazing, and mining.
- Increasing road obsures on public lands. Land management agencies have difficulty understanding/accepting the rough and rugged nature of the type of roads we want left open. The very nature of our recreational activity is to travel roads too difficult for any other type of vehicle.
- Obtaining funding and support for The Great Western Trail and the various local trail and road systems that connect with it.

Contacts for ASA4WDC Land Use Committee:

Gary Keiter, Chairman 531 N. Los Alamos Mesa, AZ 85213 Ph: (602) eve 832-1495

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SIERRA CLUB

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Grand Canyon Chapter - Arizona

RINCON GROUP

June 30, 1994

Mr. Phil Moreland, Chief Branch of Planning Environment, Lands, and Recreation BLM, Arizona State Office 3707 N. 7th St., P.O. Box 16563 Phoenix, Arizona 85014

Dear Mr. Moreland:

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We are writing in regard to the recent BLM decision to not recommend Cieneya Creek for Wild and Scenic River designation. We sek that your agency reverse this decision because Cienega Creek both merits and needs this recognition. Further, we believe that the main reason given for non-recommendation is hased on flawed arguments that it is already well enough protected.

The Sierra Club very much appreciates the BLM's management of Empire-Cienega over the past six years. Your protection of the scenic and ecologic values is praiseworthy. However, we believe the area deserves additional protective status: BLM's argument that the Gila topminnow's endangered species status will provide adequate long-term protection is flawed for these reasons: the endangered species act itself could be modified; the topminnow might either disappear or thrive so well that it would no longer be listed.

Another reason for non-recommendation was that there seemed to be no immediate threats to Clenega Creek. We believe this issue is less relevant to the question of suitability for inclusion in the Wild and Scenic Rivers System than its outstanding scenic values. More important, given the Creek's proximity to a rapidly growing urban and ex-urban population, we disagree with the judgement.

It is not difficult to imagine population pressure in the not-sodistant future drawing down the groundwater and drying up Clenega Creek as has happened to numerous rivers and creeks in southern Arizona. With the appropriate Scenic designation, the creek's flows would be protected and enhanced under the mandate of the Wild and Scenic Rivers Act Section 10(a).

There are several reasons we believe Cienega Creek damands Scenic River designation. (1) It is an outstandingly remarkable environment, one of the last and best remaining marshy riparian ecosystems with the Cottonwood-Willow biotic community. The Arizona Statewide Mild and Scenic Rivers LEIS states that the

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Response 50 - 1: Please refer to general response #8 (Cienega recommended alternative).

continued, p. 2

Creek is highly unusual since it has no exotic fish and is home to the largest population of the endangered Glia topminnow. Further, the LEIS lists three additional endangered species and 14 candidates for endangered status, as well as four rare birds. The Empire-Cienega Resource Conservation Area is probably the Dest and most diverse grassland administered by Arizona BLM. It is recognized as "prime wildlife habitat" in the LEIS. The nearby Audubon Appleton-Whittell Research Ranch Sanctuary lists more than 250 species of birds sighted. The region is particularly rich in butterfly and moth species. All this richness depends on Cienega Creek's vital water.

- (2) Cienega Creek has outstandingly remarkable scenic values. The juxtaposition of riperian and arid habitats, the variations in altitude, the striking views of mountains beyond a broad expense of grassland, the scenes of thriving and diverse plant and animal life---are these not rare and valuable?
- (3) The Creek's scenic and natural values are of national significance. Cienega ecosystems are practically extinct in the United States. To have such an extraordinary cienega so close to a densely populated city is almost miraculous. Given the impending pressures on the region, we believe that additional steps to preserve Cienega Creek for its scenic qualities are essential. Its outstanding riparian ecosystem should add to its eligibility, as did that of the Big Sandy River.

Your six years of protective management indicate that the Bureau of Land Management values Cienega Creek. We strongly urge that you do everything possible to perpetuate the Creek's ability to thrive in the long distant future. Please add Cienega Creek to the list of Wild and Scenic Rivers which you recommend to Congress.

Thank you for your help.

Yours truly,

Nancy Kelly Acting Chair

Sierra Club, Rincon Group 738 N. 5th Ave., #214 Tucson, AZ 85705

June 30, 1994

Phillip Moreland. Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

Re: Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

Dear Mr. Moreland:

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American Rivers appreciates the apportunity to comment on the Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (LEIS).

American Rivers is the premier national conservation organization dedicated exclusively to the preservation of free-flowing rivers. Since its founding 1973 as the American Rivers Conservation Council. American Rivers has worked to protect rivers under the Wild and Scenic Rivers Act and has actively assisted states and local groups with their river conservation efforts. American Rivers has worked extensively with federal agencies in planning for the river resources on lands they administer. We have assisted the planning staff of the Bureau of Land Management (BLM) in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and have reviewed, commented on, and protected numerous BLM plans.

American Rivers has more than 15.000 members across the country who use and appreciate rivers, including the many rivers and aquatic ecosystems in Arizona managed by the BLM. These rivers and their associated riparian areas have cutstanding ecological significance in this state, disproportionate to other areas of the country. Greater than 75% of Arizona's native wildlife species depend on them, including over half of the threatened and endangered species. Cottonwood-willow riparian communities in the southwest provide habitat for more bird species than any other acosystem in the country, and Arizona is famed worldwide for the diversity of its bird populations. These rivers also provide habitat for some of the last remaining populations of a number of fish species. Of the 31 freshwater fish species originally present in Arizona. 29 live only in western American civers — no other place in the world, and 26 of the 31 are

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Mr. Phillip Moreland June 30, 1994 Page 2

officially listed by the U.S. Fish and Wildlife Service as endangered, threatened or candidates for listing. Clearly many Arizona rivers and streams have national — and perhaps international — significance associated with their native fisheries. A significant percentage are managed by the BLM.

Protecting the ecological values of rivers in Arizona means more than just protecting the mainsteas of the major rivers in the state. Indeed, the key to ensuring the perpetuation of these values may lie in protecting the headwaters and tributaries within each river system. A protected headwaters region is much like a trust fund that sends proceeds in the form of clean water and nutrients to impoverished, overdeveloped downstream areas. Many of the rivers and streams in Arizona with outstandingly remarkable values that would qualify for wild and scenic protection are in the upper reaches of the watersheds in which they are found, and many are on public land, including BLM land. Wild and scenic protection for qualifying Arizona rivers can therefore go a long ways toward preserving important ecological values.

GENERAL COMMENTS

Section 5(d) of the Wild and Scenic Rivers Act, 16 U.S.C. section 1271 et seq., requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. 16 U.S.C. section 1276 (d). The planning responsibility imposed by section 5(d) plainly requires the BIM to assess the values of potential Wild and Scenic Rivers during the preparation of resource senagement plans pursuant to the FLPMA. BIM Manual Section 8351.33A mandates that where a switability determination cannot be made by the BIM in the RMF, separate legislative EIS shall be required as part of a separate reporting package (and plan assemblent) to make that determination.

To provide further guidance for fulfilling BLM's planning and management responsibilities for potential wild and scenic rivers, BLM Manual Section 8351 was developed. It sets forth requirements for the identification, evaluation, reporting and management of potential and existing wild and scenic rivers under the BLM's administration.

Under the directions established in the Manual Section, evaluation of potential wild and scenic rivers on BIM lands follows a relatively straightforward, three-step procedure. Each BLM resource management plan is to:

- (i) evaluate the <u>elimibility</u> of potential wild and scenic rivers within its planning area for inclusion in the National Wild and Scenic Rivers Systes in accordance with the criteria set forth in Section 2(b) of the Wild and Scenic Rivers Act (i.e. whether the river is free-flowing and possesses one or more "outstandingly remarkable" values);
- (2) tentatively <u>classify</u> eligible rivers as "wild." "scenic," or "recreational" and institute management measures to ensure interim protection of the values

supporting eligibility and classification determinations;

(3) assess the <u>suitability</u> of such rivers for inclusion in the national rivers system, based upon factors including the public values and uses that would be enhanced or foreclosed by such protection, the degree of public, state and local interest in designation, and practical concerns regarding costs and feasibility of administration.

BLM Manual Sections 8351.31 through 8351.33.

General Comments on Draft LEIS

American Rivers commends the BLM for its selection of a Proposed Action Alternative which recommends 27 segments in 13 river study areas as suitable for designation into the national rivers system. On the whole, American Rivers is pleased with the Draft LEIS and the Proposed Action Alternative. The BLM has demonstrated a thorough understanding of and commitment to both the S(d) process of assessing rivers for potential designation and the values of rivers and streams under BLM jurisdiction in Arizona. However, American Rivers questions some of BLM's findings of non-switability for certain segments and the corresponding exclusion of these segments from recommendation for designation in the Proposed Action Alternative. These segments will be discussed in more detail below.

Given the existence of an alternative in the LDIS labeled "Legislative Protection Alternative" which finds suitable those portions of eligible rivers which are not already protected by wilderness or national conservation status, American Rivers is deeply concerned about the lack of explanation in the LEIS of the relative protections afforded rivers by wilderness status, national conservation status, wild and scenic river status, status as an Area of Critical Environmental Concern (ACE), and any other special status conferred in a land use plan. This is a significant and glaring omission.

Each type of special status is identified on pages 18 through 21 of the Draft LEIS, but no comparison of the different protections that they provide rivers can be found in the document. The public may not be aware that the laws that established wilderness areas and national conservation areas in Arizona have different purposes, and therefore different protections for rivers, than those provided in the Wild and Scenic Rivers Act. Furthermore, they may not know that all other kinds of special status conferred on an area by the BLM including ACEC status, are administrative only, and can be revoked by the BLM rather than by act Congress.

A significant flaw in the Graft LEIS is that the BLM has given the general impression throughout the Draft LEIS that other special status protections — and indeed, even general management under existing land use plans — can substitute

Response 51 - 1: Please refer to general response # 10 (Comparisons).

Response 51 - 2: Please refer to general response # 9 (River Study Area Protection).

51-4

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for wild and scenic river protection. The BLH is required to make clear the differences in protection provided by each type of special status. NEPA requires decisions based upon law and informed decisions, not speculation. As the Draft LEIS stands now, neither the State Director nor the public has sufficient information to evaluate fully whether the public interest is adequately served by existing protections or whether designation would best serve the public interest in the rivers contained in this LEIS.

American Rivers believes also that the BLM should include with each individual recommendation of non-suitability the reason or reasons for such a recommendation. Chart 1-1 on pages 12 through 14 of the Braft LEIS provides a suitability assessment summary, but in the 20 individual environmental ispact statements contained in the River Appendix, reasons for recommending non-soutability are omitted. In order to provide the public with full information concerning the proposed alternatives for each individual river study area, the BLM should present its reasons for a finding of non-suitability side by side with such a recommendation. The Draft LEIS suggests that individual decisions regarding non-suitability were completely arbitrary.

American Rivers' concern with the presentation of reasons for a recommendation of non-suitability is not merely academic or procedural. The MEPA process, through the environmental impact statement, gives the public an opportunity to comment and make its opinion known on the proposed action. Since one of the factors to consider in the suitability determination is public interest in designation or nondesignation of the river (BLM Manual Section 8351.33A4), public comment on a draft EIS could potentially change a suitability recommendation in the final EIS. Furthermore, the decision not to recommend wild and Scenic River designation exposes the river to a continued risk of hydroelectric development that may degrade or destroy the river's free-flowing character, and to mineral development that may impair its outstanding natural values.

The Draft LEIS also contains a pervasive error that may be misleading to the public in its representation that the Gila Box Riparian National Conservation Area Management Plan is final. The management plan for that area was still in draft form as of the date of publication of the Draft LEIS, and if the management plan is not final as of the date of the publication of the final LEIS. The management actions taken from the draft Plan must be identified as draft-only when described in the final LEIS. Throughout the Draft LEIS these proposed management actions are represented as being existing actions that would be ongoing. In actuality, some or all of the proposed management actions may never be implemented, depending on what is contained in the final management plan. Since the draft status of the management plan is not made clear in the Draft LEIS, the public is not getting an accurate assessment of the environmental impacts of designation or mondesignation.

Response 51 - 3: The legislative environmental impact statement analyzes the environmental impacts of the implementation of reasonable alternatives formulated to respond to issues identified in public scoping. The basis, or reason, for determining a river study area suitable or not suitable was identified and discussed in the Bureau of Land Management suitability assessment made available to Congress and the public in September, 1993.

Response 51 - 4: In the foreword, under the section, Other Considerations, the statement is made that for the "purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation will be approved" (p. ii). In the case of the Gila Box Riparian National Conservation Area many management actions are prescribed by P.L. 101-628 (Arizona Desert Wilderness Act).

II. Comments on Individual River Study Areas

A. CIENEGA CREEK

American Rivers questions the basis for determining Cianega Creek not suitable and not recommending it for designation. According to the suitability assessment summary in Chort I-1. The segments are not nationally significant, there are no threats to free-flowing values or outstandingly remarkable values, and no additional protective management [is] needed for habitat of endangered Gila topminnow. Wo substantial changes in management would occur if river segments were added to MNSES." We feel that this assessment is wrong on two counts. First, Gienega Creek is both regionally and nationally significant as a care cienega-type river and for its native fishery. Second, management under wild and scenic status would include protection and enhancement of the values that caused it to be included in the system as mandated by Section 10(a) of the Wild and Scenic Rivers Act. This additional management prescription is substantial.

The Final LEIS should reexamine whether Cienega Creek is suitable for inclusion by Congress in the national wild and scenic river system. That decision necessarily requires a weighing of the relative public value of the strows as protected components of the national rivers system against the public values associated with other possible uses of the river. The Wild and Scenic Rivers Act mandates that inquiry and establishes a national policy that "certain selected rivers...be preserved in free-flowing condition, and...protected for the benefit and enjoyment of present and future generations." It U.S.C. section 1271 (emphasis added). The Act's policy of preservation of selected rivers balances the established national policy of favoring dam and other development at appropriate sections of our nation's rivers. Id. The fundamental task that the BLM faces with respect to any potential wild and scenic river, therefore, is to balance properly the competing values of the river if preserved or developed.

Cienega Creek is one of the last and best remaining cienega-type rivers in the southwest. Furthermore, it supports native fish populations without the presence of exotic fish species, which is a rare occurrence in the state. These values weigh in in support of finding Cienega Creek suitable. The factors that ordinarily would weigh in against finding a river suitable—(1) large percentage of private land or incompatible uses that would make management difficult, (2) reasonably foreseable potential uses of the land and related waters that would be foreclosed or curtailed if designated, (3) federal, public, State, tribul, local or other interests in nondesignation of the river, (4) significant cost of acquiring lands, interest in lands, and administering the area if designated, and (5) inability of the agency to manage and/or protect the river area/segment as a wild and scenic river — do not appear to be factors of significance in this case.

The BLM seems to have taken the position that in the absence of any threats to Cienega Creek or its values, recommending it for wild and scenic designation is not justified. However, the presence of threats is not required for a river to be suitable for designation. Once a river is found to be eligible, the policy

Response 51 - 5: Please refer to general response # 8 (Cienega recommended alternative).

51-6

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outlined in the Act suggests that those rivers should be preserved in their freeflowing condition and their immediate environments protected for the benefit and enjoyment of present and future generations. Id. Only if factors brought out in the suitability assessment indicate that it cannot or should not be designated would a river then not be recommended for inclusion in the national wild and scenic river system. What the BLM has done in the Cienega Creek suitability assessment is reverse the default position — not recommending it unless factors indicate a special reason why it must be designated. This approach is incorrect.

In view of Cienega Creek's value as a rare clenega-type river, it is imperative that the free-flowing characteristics that sustain the cienega system are amintained and enhanced. Since there appear to be no substantial impediments to designation. American Rivers believes that the balance swings in favor finding Cienega Creek suitable.

B. BASSAYAMPA RIVER

American flivers requests that the Final LEIS reevaluate the suitability of the Bassayampa River for inclusion in the national wild and scenic river system. We believe that a weighing of the relative public value of the river as a protected component of the national rivers system against the public values associated with other possible uses of the river demonstrates the need to designate the Bassayampa River.

Periodically, a proposal to build a dem in the Box Canyon on the Hassayampa (located within segment C) is revived. It is widely opposed, as a dam in that site would not so much create a reservoir as a mud flat, given the variability of surface flows. Local residents in the town of wickenburg, as well as groups such as the Wickenburg Borsemon's Association, oppose the construction of a dea, and must rally to defeat the dam proposal each time it is revisited. Wild and scenic protection for the Hassayaman would close the river to dam construction, and ensure the free-flowing values are maintained and enhanced.

The Draft LEIS cites unmanageability due to a large amount of private land ownership as the main reason for finding the Massayampa non-suitable. However, a significant percentage of private land ownership is not an automatic ber to a finding of suitability. Many rivers presently in the national wild and scenic rivers system contain sizeable portions of private land. American Rivers suggests that the Final LEIS explore the option of defining a segment that would include the Box Canyon which would be manageable.

C. YERGIN RIVER

American Rivers is deeply concerned with the recommendation in the Draft LEIS to designate the Virgin River as a Study River rather than to designate it into the national wild and scenic river system. The Virgin River is a highly threatened river system, and would be seriously jeopardized by any further delay in including it in the system.

Response 51 - 6: Please refer to general response # 11 (Suitability Determinations).

51-8

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The Draft LEIS implies that the reasoning for recommending further study rather than designation is that designation of the entire river — in Utah. Arizona and Novnda — all at once is preferable to designation on a piecemeal basis by state. While American Rivers acknowledges the need to protect river systems (and as our comments indicate the Draft LEIS fails to protect adequately headwaters and significant tributaries of many eligible streams), we believe that the Virgin River requires protective action, not the delay of more and more studies. It is possible to designate the segments of the river in Arizona first and add the segments in Utah and Nevada at a later date. The river supports two fish species that are faderally listed (woundfin minnow and Virgin River to chub), and a third that has been proposed for listing (Virgin spinedace). The woundfin and chub are in immediate danger of extinction due to hebitat loss. Yet, as the Draft LEIS acknowledges, competition for water from the Virgin River is fierce. Management of the river to preserve and enhance free-flowing values is necessary immediately.

American Rivers requests that the Final LEIS recommend designation of the Virgin River into the national wild and scenic river system. If Congress is not prepared to designate the Arizona segments without also designating the Utah and Nevada segments, it can make that political decision on its own.

D. SAN PEDRO RIVER

American Rivers is concerned that the Sam Pedro River will lack the level of management necessary to preserve its near-natural condition due to an improper classification as "recreational", and requests that the Final LEIS classify the Sam Pedro River as "scenic".

Despite three road crossings and a railroad line that parallels the river, the shoreline of the San Pedro is still largely undeveloped. The river is an outstanding example of a desertiver in the southwest, and is important wildlife habitat for many species. American Rivers believes that the San Pedro would areally benefit from the more restrictive management provided by a classification as "scenic", and feels that the river qualifies as "scenic" under the guidelines provided in the Mild and Scenic Rivers Act. Section 7(b) of the Act defines scenic river areas as "those rivers...that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads." RLM Menual Section 8351.32A2 adds the following guidence:

Scenic...means the river segment may contain more development (except for anjor dams or diversion works) than a wild segment and less development than a recreational segment. For example, roads may cross the river in places, but generally do not run parallel to it. In certain cases, however, if a parallel road is unpaved and well screened from the river by vegetation, it could qualify for scenic river area classification.

The San Pedro River Study Area defined by the BLM is the segment of the

Response 51 - 7: Please refer to general response # 1 (Alternatives).

Response 51 - 8: Please refer to general responses # 1 (Alternatives) and # 11 (Suitability Determinations).

river contained in the San Pedro Riparlan Mational Conservation Area. As the EIS acknowledges, "(a) though the study area has been used for farming, ranching. mining and recreational activities, it generally retains its natural appearance." San Pedro EIS at p.1. It is free of impoundments, and although the shorelines have seen human influence they are largely undeveloped. In part this is why the area was designated a Riparian National Conservation Area in 1988, It clearly has more development than a wild segment — there are some buildings and some evidence of the farming, ranching and mining that used to occur — but it also has less development than a recreational segment. If the road crossings and railroad paralleling the river are what has prevented the BLM from classifying the San Pedro as scenic, the guidelines in the BLM Manual clearly provide tha flexibility on this issue to allow a scenic classification for the San Pedro. Roads may cross the river. Rollroads are not specifically addressed, but certainly a railroad line that is screened from the river and carries as little or less daily traffic than an unpaved road should not automatically preclude a scenic classification. The BLH has the flexibility in tentatively classifying potential wild and scenic rivers to assign the more restrictive classification in what they consider borderline cases, and the San Pedro, as a Riparian National Conservation Area, is clearly an area where it should do so.

E. FRANCIS CREEK

American Rivers requests that the Finel LEIS reexamine whether Prancis Creek is suitable for inclusion by Congress in the national wild and scenic river system. We believe that a weighing of the relative public value of the river as a protected component of the national rivers system against the public values associated with other possible uses of the river demonstrates the need to designate Francis Creek.

Francis Creek supports a predominantly native fishery, a feature that is rare in Arizona. Furthermore, it supports at least eight threatened, endengered and candidate species. The town of Bagdad does get 63% of its domestic water supply from Francis Creek, but designation would not negatively impact that water supply or the facilities associated with it. In fact, it is possible that designation could be a benefit to the town in terms of improved water quality and/or quantity. The benefits of designating Francis Creek outweigh any possible benefits associated with alternative uses. Francis Creek should not be left open to risks to its free-flowing characteristics.

P. SANTA MARIA RIVER

American Rivers believes that the values associated with the upstream section of the Santa Maria River support designation, and urgas the RLM to re-evaluate in the Pinal LEIS the suitability of the 21.2 miles found non-suitable in the Draft LEIS.

The perennial watercourse of the Santa Maria River supports many wildlife species that depend wholly or partially on riparian zones for part of their life

Response 51 - 9: Please refer to response # 51 - 7.

cycle. The upper section contains an important desert riparian ecosystem that is of regional significance. According to the Draft LEIS, this area could significantly contribute to the recolonization of the Colorado River by bald eagles.

51-10

The decision not to recommend Wild and Scenic River designation for the upper section of the Santa Maria exposes it to a continued risk of mineral development that may impair its outstanding natural values.

G. BONITA CREEK

American Rivers believes that the termination of the upper segment of Bonita Creek at Lee Trail Road is arbitrary, and excludes a portion of Bonita Creek from Lee Trail Road to the morthern boundary of the parcel owned by the City of Safford that is suitable for designation into the national wild and scenic river system. We request that the Final LEIS extend the upper segment to include that portion.

Bonita Creek from Lee Trail Road to the City of Safford property boundary contains a significant riparian area with important wildlife habitat. In the Braft Gils Box Riparian National Conservation Area Hanagement Plan, under the Preferred Alternative, the majority of that section of the creek is recommended to be in a hanagement Zone A, which is the most restrictive management Zone cone. The desired environmental condition for Management Zone A is "assentially a natural environment, largely unmodified by contemporary human activities and structures." Draft Gila Box Riparian National Conservation Area Interdisciplinary Activity Plan/Environmental Assessment at p. 11.

51-11

We presume that the segment found suitable, the upper segment, was terminated at Lee Trail Road because the use of a road as a boundary simplifies management for the BLM. We can find no other reason why the segment was not extended to the City of Safford parcel. The reason given for finding the lower segment unmanageable. If there is another reason why the Lee Trail Road-to-City of Safford land segment is not suitable, it was not presented in the Draft LDIS. We must therefore conclude that the downstream emploint of the suitable segment was arbitrarily designated, and the portion of the river down to the City of Safford parcel was improperly excluded.

III. Errors in the Draft LEIS

American Rivers has identified a number of errors and omissions in the Draft LEIS which are presented below. We urge the RLM to make the appropriate corrections in the Final LEIS.

We identified a large number of typographic and proofing errors, which will not be enumerated in these comments. The BLM would be well-advised to carefully proof the Final LEIS.

Response 51 - 10: Please refer to response # 51 - 7.

Response 51 - 11: The Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land, the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

51-13

51-14

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51-19

51-20

- 1. In the summary of impacts from implementing the No Action Alternative, a paragraph is included at the end that discusses the impacts from implementing the All Suitable Alternative (p.5). It would appear from the content of that paragraph that "All Suitable" was inadvertently inserted where "No Action" was intended.
 - In Table 2-AS) on page 31, the total mileage given for the Middle Gila River (5.7 miles) is less than the sum of the mileage for the three segments identified (20.5 miles).
 - Text on page 70 identifies five segments with mineral potential and outside of wilderness areas that would be recommended for a Wild classification and withdrawn from mineral entry, but Table 4-PAMM2 on page 73 shows six such segments.
 - 4. The following statement is found on page 120: "It is unlikely that designation would have any impact on instream flow, since any water right resulting from designation would be non-consumptive." This statement does not make sense. The federal reserved water right associated with a wild and scenic designation is essentially an instream flow right, which would be satisfied by leaving water in the stream channel. Since the statement was made in response to an inquiry about whether designation will adjust flow, the statement should make clear the fact that designation would not create additional consumptive rights that would require further diversion of water from the stream channel. Bowever, it should add information about the federal reserved water right.
 - 5. The map for the All Suitable Alternative on the Agua Fria River (page 10 of the Agua Fria EIS) appears to be the same as the map for the Proposed Action. Since the All Suitable Alternative has only two segments, and the map shows three, the proper All Suitable map seems to be missing.
 - 6. The Proposed Action for the Bill Williams River adjusts the segments identified in the study area, but the description on page 6 of the Bill Williams EIS fails to identify the endpoints of the adjusted segments.
 - 7. The Bonita Creek EIS alternatively identifies the San Carlos Apache Tribe (p.3) and the San Carlos frrigation and Draimage District (p.4) as the protestant on the BLM's instream flow water right application on Bonita Creek.
 - 6. The Bonita Creek EIS states that no other alternatives were recommended by the public or other agencies (p.17). This is incorrect. The Arizona Rivers Coalition recommended that a segment of Bonita Creek from the San Carlos Reservation to Lee Trail Road be designated as a scenic river, and a segment from Lee Trail Road to the confluence with the Gila River be designated as a recreational river.
 - The map for the No Action Alternative on the Gila Box: Gila River (page ID of the Gila Box: Gila River EIS) is included twice instead of providing the map for the All Suitable Alternative.

Response 51 - 12: The corrected information appears in the final document.

Response 51 - 13: The corrected numbers appear in Table 2-AS1 in the final document.

Response 51 - 14: The corrected information appears in the final document.

Response 51 - 15: A revised response appears in the final document.

Response 51 - 16: The corrections appear in the final Agua Fria River maps in the river appendix volume.

Response 51 - 17: The corrected information appears on the map in the final document.

Response 51 - 18: The corrected information appears on the map in the final document.

Response 51 - 19: This alternative suggestion was not given to the Bureau of Land Management. The publication in which it appears was not available to Bureau of Land Management personnel during the preparation of the environmental impact statement.

Response 51 - 20: The corrected information appears in the final document.

51-21

10. The Hot Springs Canyon EIS states that no other alternatives were recommended by the public or other agencies (p.10). This is incorrect. The Arizona Rivers Coalition recommended that approximately two miles of Mot Springs Canyon be designated as a wild river.

51-22

11. The Turkey Creek EIS states that no other alternatives were suggested by public or other agency sources (p.10). This is incorrect. The Arizona Rivers Coalition recommended that a segment of Turkey Creek from Oak Grove Canyon to Aravaipa Creek be designated as a recreational river.

51-23

12. On page a of the Virgin River EIS, the Bureau of Reclamation is said to be currently evaluating the feasibility of the Lower Virgin River Project that would divert water from the river for use in southern Mewada. The Bureau of Reclamation is no longer involved in that project, but it continues to be evaluated by the Las Vegas Valley Vater District.

IV. Conclusion

American Rivers reiterates its strong support for the RLN's efforts to recommend potential wild and scenic rivers in Arizona as suitable for dasignation into the national rivers system. We trust the comments set forth above prove useful in the preparation of the Final LEIS. We look forward to continuing our productive coordination with the Arizona State Office, the District Offices, and the Resource Areas. Please do not hesitate to communicate with us if there are questions concerning any of these comments or other matters related to potential wild and scenic rivers on BLN administered lands in Arizona.

Sincerely.

Panula W. Hyde_

Conservation Associate Southwest Regional Office 72916EE

Gail A. Paters Director Southwest Regional Office

cc: Sen. Dennis DeConcini Sen. John McCain

Rep. Sam Coppersmith

Rep. Karan English Rep. Jim Kolbe

Rep. Jon Kyl Rep. Ed Pastor Rep. Bob Stump Response 51 - 21: See response 51 - 19.

Response 51 - 22: See response 51 - 19.

Response 51 - 23: The corrected information appears in the final document.

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July 6, 1994

Dear Pail Moreland:

Admittedly, I have not followed this "Wild and Scenic Rivers" legislation as closely as I could have and do not know the total ramifications of jits effect. I do understand that it will reduce our ability to control the river when it needs controlling; to continually divert the water for agricultural use; and to diminish the torrential, damaging effect of flooding.

For the many fool-hardy moves government and activist groups are currently makingthe spotted owl hoax, which reduces jobs in the timber industry; the altempts to eliminate trapping, hunting and fishing through Proposition 200; and the attempt to triple the cost of grazing fees for ranchers in one fell swoop, let's not add to this list of assininity this "Wild and Scenic Rivers" idea. The impact down-the-road of such foolishness could ruin hundreds of acres of furnitand along the river, wash away wildlife habitat for miles and affect the economic picture in several counties till doomsday.

Please accept these concerns with the alternative of "no action" to this "Wild and Scenic River" legislation.

Sincerely.

PARK ROMNEY

Concerned Citizen and County Director for The Arizona Trappers Association



JUL 8 7 1994

000081

FRIENDS OF ARIZONA RIVERS

503 East Medlock Drive Phoenix, Arizona 85012 (602)-265-4325

July 7, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizons State Offics US Bureau of Land Management Post Office Box 16563 Phoenix, AZ 85011

Dear Mr. Moreland:

We write to comment on the Draft Arizona Statewide wild and Scenic Rivers Legislative Environmental Impact Statement (LEIS), issued April 1994 by the Bureau of Land Management (BLM).

Friends of Arizona Rivers (FAR) is an Arizona based group of about 25 persons interested in preserving the natural features of streams. For the past ten years we have supported efforts to place suitable streams in Arizons into the national Wild and Scenic River (WSSR) system.

We realize that the effort to protect free-flowing streams in Arizona is about a century too late in many cases. Many of Arziona's best rivers and segments have been pressed into service for other purposes: hydroelectric power, flood control, water storage, donor sites for sand and gravel, fuelwood harvesting, grazing and overgrazing, and commercial development of the stream banks. A particularly destructive practice in Arizona is the abuse of groundwater pumping to the point of dewatering a stream and its associated fish, wildlife, and vegetation. We as a society have benefitted greatly, but we have not respected our river environment in Arizona.

We pay a price for this negligent and sometimes malicious treatment of our streams. Many of our native fish are threatened, endangered, or even extinct. Whole ecosystems are threatened by our past failures to realize what we were doing to our heritage. Further, we lose the opportunity to recreate and restore our spirits in the God-given surroundings. In the past we failed to act to save what was being lost. Maybe our forefathers did not know better. Maybe they had other priorities. But now it is time to save what remains. Our group believes that it is time to take action and accommodate to the needs of our remaining streams. We look forward to working with the BLH and Congress in setting our priorities straight with regards to river protection.

In general, we think that the Arizona office of the BLM has done a good job in studying, describing, and proposing streams for recommendation to Congress. In many cases we completely support the BLM Proposed Action as described in the draft LEIS. Of the 14,300,000 acres managed by BLM in Arizona, 103,541 acres (0.7%) were found eligible for further study, and only 72,140 acres (0.5%) were found suitable for recommendation. These data highlight the rarity of these valuable lands. In general, we are pleased with BLM's description of ongoing management for the streams.

The designatin of W&SR will offer unique advantages that will cooplement the management goals of the agencies. There are a number of specific comments addressing specific streams and sequents that follow.

1. Aqua Fria River

pl, R, para 4: Doesn't the BLM land on segment B (renamed C in the DEIS) extend about one-half mile past Larry Creek? (It is hard to see on the maps.) If so, we recommend that the WASR boundary extend to the end of the contiguous BLM land.

p6/7 (M&SR Management Actions): We recommend that BLM approach the Arizona Department of Transportation (ADOT) and request that they acquire (through purchase) a water right from a rancher above the M&SR segments. ADOT could allow the water to flow naturally through the W&SR segments A and B and be extracted at the Pumphouse. This win-win scenario would benefit both ADOT and the riparian habitat.

p7/8 (Ongoing): We generally support.

- 2. Arevaips Greek We support the BLM Proposed Action. This is a "no-brainer": Aravaips Creek is a backpacker's paradise. Visitors come from around the country to visit this pristins jewel. It fits all the criteria for a wild river.
- Big Sandy River
 We support the BLM Proposed Action.
- 4. Bill Williams River (BWE)
 The BWR contains a number of outstandingly remarkable values.
 These values are threatened by past management practices and some of the current objectives for management of Alamo Lake. FAR supports management of the lake that will result in improved aquatic (including riparies) habitat of the BWR.

Friends of Arisona Rivers

Response 81 - 1: The southernmost river segment extends for approximately .25 mile past the confluence of Larry Creek and the Agua Fria River. The corrected information appears in the final document.

,

Segment A

For reasons that we give below, FAR does not support the BLM determination that segment A of the BWR is suitable. We believe that there are not enough washes contributing to its flow in this upper reach. Because of these limitations, we do not favor inclusion of Segment A in the national WESR system. Unfortunately, we are 25 years too late in trying to preserve this segment in a free-flowing, natural condition. This segment is now too dependent upon regulated flow and it does not function as a natural river. We also are concerned that WESR designation would set a bad example for the management of other rivers in Arizona: WESR designation is supposed to halt the placement of dame.

Segments B and C

In contrast to the situation in Segment A, the side streams in Segments B and C are able to support essential values and functions of the EWR. Despite some devastating fluctuations in the flows from Alamo Dam over the past few years, there are some moderately healthy stands of willow and cottonwood riparian forests in these segments. Although segments B and C are somewhat dependent upon the regulated releases from Alamo Dam, they also stand on their own to some degree.

Planet Ranch and Havasu NWR

Groundwater pumping at the Planet Ranch has devastated the riparian forests that once lined the river. One can see that the deplation of groundwater has affected the vegetation right up to the edge of the national refuge. For whatever reason, the refuge appears to be in good shape. The vegetation lining the river in the refuge is extremely wild and dense. The washes that feed these downstream areas probably are supplying sufficient water to periodically recharge the groundwater table through the refuge. Although somewhat dependent upon flow from Alamo Dam, the river in the refuge has been able to withstand much stress. FAR finds that the BMR in the refuge is both eligible and suitable for WaSR designation. We support a recommendation by the USTAWS that it be found suitable for designation. The BLM should work together with USTAWS to ensure coordination of management of the suitable

Priends of Arizona Rivers

Response 81 - 2: Please refer to general response # 11 (Suitability Determinations).

To me this is a gray area, subject to some interpretation. It is my belief that the flow should occur naturally or quasi-naturally. For example, if a dammed river has side streams that allow the main channel to perform all, most, or many of its riverine functions then I would consider the river suitable. These functions include silt deposition and removal, periodic flooding and drought in cycles that are seasonally appropriate, water quality and quantity appropriate for the elevation of the river, native flora and fauna, etc. Where the flow and riverine functions are directly dependent on man-made releases then I do not consider the river to meet the free-flowing criteria and intent.

segments.

FAR recommends that the entire length of the BWR receive the benefits that are potentially available from the interagency management described on page 3. So far, we are not impressed with the progress. There has been virtually no publicity about any progress in preserving the aquatic habitat and in ensuring that flows from Alamo Dam will sustain the riparian areas. If the situation does not improve then we will look for legislative solutions to ensure proper management.

p14, R (D): FAR would like to emphasize the ecological and hydrological value of the riparian vegetation in the 21-mile segment and in the Kavasu NWR downstream. In comparison to the degradation sustained by the Colorado River, the Bill Milliams River still maintains much of its ecological value. Perhaps this preservation is due to the relative newness of Alamo Dam, completed only in July 1968.

81-3 The Bill Williams corridor is a flyway of international significance. FAR recommends that <u>hydrology</u> be added as an outstandingly remarkable value in all sagments because of its importance to the downstream NWR.

p18, R, para 2: We recommend that the need for in-atream flow to support non-motorized recreational float trips be of lower priority than the need for water to sustain fish and wildlife values. The recreational trips need only occur at a frequency that would occur with natural events if Alamo Dam were not present. In the management plan, the BLM will have to ensure that fish and wildlife values of the river are not degraded by recreational uses.

5. Bonita Creek

There are outstandingly remarkable values (scanery, fish and wildlife, cultural) on Bonita Creek that extend from the edge of the San Carlos Reservation to the confluence with the Gila River. We recommend that BIM designate an additional portion in tha final Efs; this would be called section 2, to be composed of the five miles of river that runs from Lee Trail Road (section 36) to the Gila River. The "All Suitable Alternative" should show this segment. Furthermore, we recommend that BIM reconsider its Proposed Action and that they find the five miles of segment 2 as suitable for W&SR designation.

6. Burro Creek

There are a high number of visitor user days on this creek (the

Friende of Arisona Rivers

Response 81 - 3: Please refer to general response # 3 (Eligibility Determinations).

Response 81 - 4: The all suitable alternative includes the entire length of Bonita Creek from the San Carlos Apache Reservation boundary to the Gila River. The area downstream of Lee Trail was not considered due to the operation of the city water system and the presence of four parcels of private land. The stretch of the creek between the upstream end of the city property and Lee Trail is often dry. Please see general response # 1 (Alternatives).

US Army Corps of Engineers, Los Angeles District. Alamo Lake. Arizona. Reconnaissance study. P.O. Box 2711, Los Angeles, CA 90053-2325. July 1990.

second highest of all streams in the DEIS). We support the BLK Proposed Action.

7. Cienega Cres

We are puzzled by the BLM proposal that recommends this creek as "non-sultable". It is outstandingly remarkable for three reasons. First, it is one of only a handful of true cisnegas still remaining in the southwest. There has been little in the way of downcutting of the soil, so it functions as a benchmark area that can be used as a comparison to other areas. Second, it functions as an important ecological corridor between Mexico and the US. (The San Pedro River is the other important, major corridor.) Third, its riparian vegetation and soils are healthy enough to attenuate flood waters. This is a very notable function important enough to Pima County that it acquired some of the lands.

PAR urgas the inclusion of Cienaga Creak among the streams that it recommends to Congress as suitable for Wask designation. We recommend a "scenic" classification.

- 8. Francis Creek We have no comment on this stream.
- 9. Gila Bor: Gila River pl: The EIS should put into perspective the ecological importance of the rivers located in the Gila Box. This perspective is important because the proposed action is so complimentary to the intent of the NASR Act of 1968. Specifically, the Gila River travels about 400 miles across Arizonz. All but about 40 miles of the upper reaches have been diverted, dewatered, developed, dammed, or otherwise affected by regulated flow. If the Congressional intent is to balance the previous policies that allowed such practices, then WASR designation of the Streams feeding the Gila Box makes a great deal of sense. This is one of the major reasons that FAR is so supportive of WASR designation of the Gila River Complex, including the Gila River in the Gila Box.
- p8 (B. PA, para 1): The paragraph does not match the map on page 9. FAR recommends that the paragraph state that segments 1 and 3 are suitable for <u>scenic</u> designation, and segment 2 is suitable for <u>vild</u> designation.
- pl3: Map should be labelled "(All Suitable Alternative)".
- pi0. (L, para 3): We believe the sentence should state "Moodcutting would not be allowed." It is very important to build up the organic debris (eq. downed trees) in order to restore the natural functions of the river (eq. trapping sediment, riparian mini-habitat).

Response 81 - 5: Please refer to general response # 8 (Cienega recommended alternative).

Response 81 - 6: The map has been corrected in the final document.

Response 81 - 7: The final document includes the correct maps.

Response 81 - 8: The final document contains the correct wording.

5

Friends of Arlzons Rivers

81-10

p26 (L, I.): We question the economics of allowing any grazing in the study area at all. This issue can be addressed apart from any designation of WSSR.

10. Hassayampa River

This small river is the only stream that FAR has recommended in the massive Lower Gila River Basin. The Hassayampa River drains a large area of several thousand square miles.

81-11

Designation of the Hassayampa River as a Wild and Scenic River is very important because of the opportunity for true ecosystem management in the watershed. There are few rivers in the ARC proposal that include federal lands in both the headwaters and in the low lands. The Hassayampa River is an exception in that the USFS manages the range and river at its headwaters. As it tumbles out of the Bradshaw Mountains, the Hassayampa River then fails into BIM jurisdiction.

The draft EIS appears to accurately describe the affected environment. I concur that there are a number of outspandingly remarkable values including: scenic, fish and wildlife, ecological diversity, and (I would add) hydrology and recreation.

Evirology The reaches of the Hassayampa River above Wickenburg provide significant attenuation of flood waters. This is a remarkable hydrological feature in areas where the river widens past the Box. Management as a WaSR could convey substantial benefits to the town of Wickenburg in terms of flood control without relying upon an expensive dam. Because the preclusion of a dam in the Box would be the major impact of WASR designation on the Hassayampa River, I believe that the EIS needs to present and discuss this issue in more detail.

Rydrology and an assured surface water supply is of critical importance to several miles of excellent riparian habitat south of Wickenburg, including the world-famous Nature Conservancy preserve, and the heavily visited interpretive

Response 81 - 9: The remaining 1.2 miles of road in the riparian area of the Gila Box is in the proposed action of the draft Gila Box Plan. These roads consist of 0.2 miles for public access and 1.0 miles for administrative access.

Response 81 - 10: Grazing decisions for the Gila Box were made in the Upper Gila San Simon Grazing Environmental Impact Statement (1978). These decisions were incorporated by reference into the Safford District Resource Management Plan (1991).

Response \$1 - 11: Please refer to general response # 1 (Alternatives).

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J On the morning of July 3, 1994 I observed the following widdlife in the Box: the howls of coyotes, a fist-mized frog that jumped onto my pillow at dawn, the hoots of a large owl, two foxes that scampered up the cliff near the flow gauge, six turkey witures, three Cooper's hawks, and numerous other birds. Not had for four hours of observation!

Rest Stop that has recently opened on Highway 89.

Regrestion Rikers, horse riders, bird watchers, and alse ORVers find the HR a remarkable place to visit. Currently the Box is being loved to death. There is obviously a proliferation of ORV use and abuse in the Box and the produces and was an abuse in the same and account on a trip to Nickenburg and the Box as recently as July 2-3, 1994. ORVs were using the streambed and the riparian area as a vehicular byway for much of the night. Fireworks and firearms were discharged frequently. Beer cans and bottles littered the area the next morning. Nevertheless, other than this recreational use, there were few signs of human development. There is a potential for a dramatic increase in recreational use when the area is "discovered" by the hordes in Phoenix. The growing population of Wickenburg also will contribute to the recreational pressures.

The DEIS accurately describes the adverse environmental consequences of the Proposed Action (BLM has proposed a non suitable recommendation). The DEIS describes that the Proposed Action would have no adverse consequences on mineral development or on the speculative flood control project at Box Canyon. Mowever, neither of these activities appear to have significantly positive impacts to the local environment. There are few active mines in the area; the DEIS fails to describe the importance of current commercial production. There is little justification in the DEIS given for the need for a flood control project, other than to say that the recent floods caused some impacts to Wickenburg.

The DEIS appears to admit that there would be minimal negative environmental, social, or economic consequences if the HR is designated. We believe that BLM should conclude that the designated. We believe that but should conclude that the Hassayampa River is <u>suitable</u> for designation. At least segments 1 and 2 can be found suitable now, based on the existing data in the DEIS. We urge that the BIM look closer at the minimal negative impact of designation. We believe that when BIM staff have completed further analysis of segment 1, they will conclude that it also should be recommended as suitable in the final EIS.

11. Rot Springs No comments.

81-12

12. Lower San Francisco River

11. Lower sem framelses Kaver pl4, R. E. parà 1: The ARC actually proposed two segments, totalling 8 miles. Segment one <u>beging</u> at a point 2.5 miles south of Clifton. This point, and the ARC proposal for the two segments, are accurately depicted on the map shown on page 11.

The BLM has proposed that the upper 1.5 miles of segment 1 be recommended as non-suitable. FAR finds the BLM recommendation

Friends of Arizona Rivers

Response 81 - 12: This alternative suggestion was not given to the Bureau of Land Management.

11:

81-14

11

acceptable. However, we would like to note the historical significance of the slag-covered river bank on river-left (upstream of Section 12). Such past management practices, whatever the motivation, are historically important because they contrast with current approaches to riparian management.

We do not agree with the BLM recommendation that segment 2 be classified as "recreational." Given the lack of development in this segment, a "scenic" classification is more appropriate.

If and when Congress designates W&SRs in the area of the Gila Box, FAR requests that BLM consolidate the streams into one management unit. For example, the unit could be called the Gila Box Wild and Scenic Rivers Complex, comprised of: the Gila River, lower San Francisco River, Bonita Creek, and perhaps Eagle Creek.

13. Middle Gila River We support the BLM Proposed Action that finds a 7.5 mile segment as suitable for WESR designation. (However, we can measure only 6.5 miles on the map shown on page 7.) This segment runs from the area of Dripping Springs to a point a couple of miles above Winkelman. The BLM has proposed that this segment have a "recreational" classification, which we also support.

The upper two study segments (labelled segment 1 and 2 on the map on page 9) of the middle Gila contains many important values that we recommend be protected by the BLM and other agencies using management tools other than WASR designation.

14. Paria River/ Buckskin Gulch pl: The DEIS refers to a study area of 28 miles from the Arizona-Utah state line to the edge of the Glen Canyon WRA. FAR counts only 21 miles on the map on page 6.

p3: With designation of small amounts of Wilderness in Utah, there is precedence for BLM to include out-of-state areas when it makes sense and it is pertinent to the issue at hand. There has been plenty of notice to residents in southern Utah about the BLM action to study rivers for WESR designation. They have attended a public meeting and given input. In the interest of ecosystem management and integrity, FAR recommends that BLM include Buckskin Gulch in their current WaSR recommendations.

pages 3 and 6: There is little description of segment 2 in the text, nor a reason why a "scenic" label has been applied. YAR recommends that segment 2 be described as possessing the same general characteristics as described for segment 1. Purthermors, we recommend that segment 2 be labelled as "wild". On page 20 we recommend that BLM add a paragraph on interagency coordination and mention any plans for future interagency coordination should Congress designate the Paria River.

Friends of Arizona Rivers

Response 81 - 13: The mileage data are derived from the suitability assessment and eligibility determination in the final Safford District Resource Management Plan (1991).

Response 81 - 14: The mileage data are derived from the suitability assessment and eligibility determination in the final Arizona Strip District Resource Management Plan (1991).

Response 81 - 15: Buckskin Gulch is located in Utah and the Arizona Bureau of Land Management does not have authority to determine eligibility or suitability for this waterway.

Response 81 - 16: The correct map displaying the Paria River Study Area segment is contained in the final document.

15. San Pedro River We strongly support the BLM's recommendation for designation as a WESR. This river has some of the highest ecological value in the

• The longest undammed stream in Arizona.

Has 1/10th of the 530 endangered species in the US.
Has a 12,000 year-old archeological mammoth kill site.

. Is the best preserved cottonwood-willow forest in Arizona. . Functions as a critical corridor for wildlife from the

tropics and Mexico.

. The heaviest annual visitor days of all the BLM streams.

FAR believes that the "recreational" classification by BLM is not appropriate. For reference we reviewed the criteria specified in the Introduction Volume (page 10). In general, the san pedro River fits atther the "wild" category or the "scenic" category. We recommend that the final BIS recommend a "scenic" classification for both of the BLM recommended segments. The San Pedro River deserves the national recognition as the showpiece of a southwestern desert-river ecosystem.

16. Santa Harie River We agree with the BLM Proposed Action.

17. Swamp Springs We have no comment.

FAR recommends that BLM find it suitable and combine it with Aravaipa Creek for management purposes.

The river has many important values: fish and wildlife (T&Es), scenery, and recreation including boating. This is a highly threatened river that will die if it is not given federal protection. We believe that it is important to preserve natural, free flows. Any development that is scheduled for southern Utah ought to accommodate the fact that the Virgin River is of national importance and that it too deserves to retain its vital functions in the area.

We support the classification proposed by BLM. However, we urge that BLM recommend the Virgin for outright designation and not for further study. The BLM already has done a sufficient job in describing the issues in this DEIS.

20. Wright Creak We believe that the stream is regionally significant because of its fish and avian related values. There are few or no conflicts with other resources in the area. Although designation would not significantly change they way the area is managed, we believe

Friends of Arizone Rivers

Response 81 - 17: Please refer to general responses #1 (Alternatives), and #11 (Suitability Determinations).

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that the stream would make a good additional to the national system. Now is a good time to recommend its suitability, before conflicts arise.

Other comments

Table 3-2 on page 42 lists potential natural vegetation and scoragions. I am not familiar with the importance or usefulness of this table. I am sure that it is important because it is addressing the issue of the ecological diversity and potential. Could BLM add a paragraph or two that describes how this data can be used in the decision-making process?

Table 3-7, page 49: I am impressed by the number of special status species contained in the eligible rivers. The Proposed Action will offer an additional layer of protection to these species.

Page 115: I commend the BLM for its efforts to inform the public in terms of written material, meetings and hearings.

Page 120, #37: The response is correct, but incomplete. I think a better response would be to say that, in general, using a wild and scenic river for a cattle drive would be discouraged.

We appreciate the opportunity to comment. Thank you for your work.

Sincerely,

Timothy J. Hood



Cyprus Amas Minerals Company 9100 East Mineral Cricle Post Office Box 3299 FMI 8 \$ 1994 303-641-5328 FMI 645-5988

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JUL 7794

Les A. Darling Director, Environmental Affairs NA STATE CIFFUS SUBSAU CF JAND AGAIT

June 30, 1994

Mr. Phillip Moreland, Branch Chief Planning, Environmental, Land and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 18563 Phoenix, AZ 85011

Re: Arizona Statewide Wild and Scaric Rivers DEIS

Dear Mr. Moreland;

Transmitted herewith are Cyprus Amax Minerals Company's (Cyprus) comments on the Arizona Statewide Wild and Scenic Rivers' Draft Environmental Impact Statement (DEIS). Our comments consist of this letter, the anclosed Technical Memorandum (dated June 15, 1994) and the five bound reports prepared by SWCA, INC. The bound reports have been previously provided to your office but, we understand, were not provided in time to be considered in the development of the DEIS.

Cyprus has substantial investments in five mining and mineral processing facilities in the State of Arizona and produces a significant portion of our nation's copper supply from these mines. We are continuing to both upgrade and expand these operations with the expectation that we will be recovering the valuable mineral resources at these properties well into the next century. We are very concerned that the BLM's Wild and Scenic River recommendations, if approved, would adversely impact our ability to continue mining and processing the mineral resources which exist near river segments recommended for inclusion in the Wild and Scenic system. We have expressed our concerns throughout BLM's EIS process, including offering comments at sooping sessions and public informational workshops, preparing written comments on draft Resource Menagement Plans (RMP's), final RMP's, and now in commenting on the DEIS. We have maintained a constructive approach in perticipating in this process and submit these comments and reports in an effort to continue to be constructive.

Two concerns are of particular importance to Cyprus. First, we request that the 8LM reevaluate its date file and the comments submitted on the DEIS and exclude those reaches
of the upper Gila River within Sections 15, 16, and 21 identified as the upstream portion
of Segment 1. This portion of the Gila River involves private and state ownership and
could be readily excluded without fragmenting the remaining river segment. As the
technical memorandum points out, the presently inactive mining operation (our Christmas
Mine) and the existing mineral potential of this area is inadequately recognized in the
DEIS. The proposed action should not include this segment for the same reasons that
other stream reaches along the Gila with existing mineral development and considerable

Response 82 - 1: Please refer to general response # 1 (Alternatives).

mineral resource potential have been excluded.

Second, although Cyprus strongly supports the BLM's proposed action of not including Burro Creek Segment C in the Wild and Scenic River program, we request that the BLM reconsider the inclusion of Segment B. Segment B is entirely within a designated wilderness area and the DEIS offers no convincing or compelling reasons to suggest that this study segment requires wild or scenic or recreational designation to preserve its values. One of Cyprus' key concerns is that Wild and Scenic designation of this stream segment could impair our ability to exercise valid pre-existing water rights which have

We appreciate your attention to these concerns and trust that the enclosed technical comments and reports are helpful in completing the final EIS and 8UM's recommendations. Please contact me if you have any questions on our comments or concerns.

been carefully protected by Congress in the prior wilderness area designation.

Sincerely yours,

Of Harling

LAD:amr

cc: The Honorable Fife Symington (w/o ett.)
The Monorable John McCain (w/o ett.)
The Honorable Joh L. Kyl (w/o ett.)
The Honorable Bob Stump (w/o ett.)
Mu_Laster K_Rosenkrence (w/o ett.)

Response 82 - 2: Please refer to general response # 4 (Federal and State Water Rights). The authority of the Wild and Scenic Rivers Act does not apply to nonfederal land or valid, existing rights.

JUL 6 2 1967

Central Artzona Paddlers Chib P.O. Box 45344 Phoenix, AZ 85064-5344 602-271-4012

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Mr. Phillip Moreland
Branch Chris / Planning, Environment, Lands and Recreation
Arizana State Office / Bureau of Land Management
3707 North 7th Street
P.O. Box 16561
Phoenic, AZ #5011

Dear Mr. Moreland

I are writing to you on behalf of myself and of the 200 Arizona river recreationists represented by the Central Arizona Paddiers Cub., Our Cub., founded in 1926, has been consistently active in the wise use and preservation of Arizona's river, streams, and other riparian areas. We have actively participated in the review of management plans on the Salt, Verde, and Gila rivers. We have been involved, on an ongoing besis, in advisory review panels on both the Upper Salt River and the Colorado River! Grand Canyon for the last 5 - 6 years. Our members have beem variously involved in the Arizona Wilderness Coalition, the Arizona Rivers Coalition, and Friends of Arizona Rivers.

We have reviewed the BLM Draft LEIS regarding potential Wild and Scenic Rivers designation of Arizona rivers, and commond the BLM for the breadth of its offers. We see very pleased that BLM has recommended protection of 27 segments in 13 river study areas in in Proposed Action Alternative. We have, however, several comments on the LEIS, as well as suggestions regarding alternative elsesifications on certain river segments.

We feel strongly that protection under the Wild and Scenic Rivers Act is not a duplication of protection provided under other elastifications such as Wilderness status, National Conservation status, or any special status conferred under a land use plan. We would, therefore, like to see the added protection afforded by the Wild and Scenic Rivers Act applied to all possible river / stream segments under BLM jurisdiction in Arizona.

We feel that there is insufficient reason given in some cases for findings of non-autisbility on certain segments. Regarding specific river segments, our recommendations are as follows:

Foremost, in light of recent experience, is a recommendation for Wild designation of the section of the Gliz River beginning just downstream from Coolidge Dam and extending for approximately 20 miles along the southern border of the BLM's recently designated Needle's Eye Wilderness Area. Walle we restize that there would be issues to work out with the San Cartos Apache Tribe regarding management of the area, we feel that this segment is so exceptional as to warned a special effort to resolve any jurisdictional questions which might otherwise interfere with designation.

Response 84 - 1: Please refer to general response #9 (River Study Area Protection).

Response 84 - 2: The 5.5-mile segment extending from Coolidge dam to Hook and Line Ranch was determined eligible for a recreational classification. See general response # 3 (Eligibility Determinations).

84-2

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84-3	1
	-

- We disagree with the finding of non-suitability of Clenege Creek. There appear to be no substantial reasons for non-designation. If designated, substantial changes in management would need to occur to protect and enhance those qualifies which justify designation in the first place, such as its character as a rare clonega-type river and its native fishery with an absence of exocic fish species.

84-4

• We would like to see the Hessayumpa River re-evaluated. The criterion of private land ownership on this regress! does not automatically disqualify it for designation and protection. At a minimum, BLM should altempt to define a manageable segment which would include the Box Canyott and thereby prevent any future attempts to build a dam in that area. The prospect of a dam harte has been consistently opposed by local residents in Wickenburg and by groups such as the Wickenburg Horsemen's Association.

84-5

• The Virgin River asymmet in Arizona must be designated directly into the Wild and Scenic System, rather than as a Suidy River. Delaying its protoction would jeopardize federally designated ordengored fish species which are in immediate danger of extinction dose to habitat loss. Any decision to include the Utah and Novada segments under W.A. S protoction should be left to the next level - the U.S. Congress; it should not be a reason to fell in protocting the Arizona segment to the criterit possible.

84-6

 We feel the mitability of Francis Creek should be re-evaluated. It supports accernal threatened and endangered species, including a predominantly parise fishery.

The upper 20+ miles of the Santa Maria River mare be re-evaluated. This section contains an
important desert riparian ecosystem providing habitat capable of supporting the Bald
Eagle. According to the Draft LEIS, this area could significantly contribute to the
recolonization of the Colonado River by these magnificent birds.

:

Finally, we request extension of the upper segment of Bonsta Creek to include the area from
Lee Trail Road to the northern boundary of the purcel owned by the City of Safford.
This area contains a significant riperian area with important wildlife habitat.

84-8

It's hard to overestimate the ecological significance of the remaining rivers, streams, and riperian areas in Arizona. Wy understanding is that we have remaining today in Arizona only about 1.5% of the riperian areas which emisted in the nineteenth century. Surely we should do whatever is in our power to keep those remaining areas from being dimensioned in any way, whether through diversion of water, underregulated grazing, pollution from mixing, groundwater pumping, etc., etc.

Sincertaly,

Dil OHijigh

Dave Huizingh Conservation Coordinator Central Arizona Paddlers Club 244-4216(W) / 966-5551(H)

Response 84 - 3: Please refer to general response # 8 (Cienega recommended alternative).

Response 84 - 4: Please refer to general response #1 (Alternatives).

Response 84 - 5: Please see response 84 - 4, above.

Response 84 - 6: Please see response 84 - 4, above.

Response 84 - 7: Please see response 84 - 4, above.

Response 84 - 8: The Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

97.1

000097 THE RE INC.

Morenci Brench, Morenci, Arizone 85540 • (602) 865-4521

Timethy R. Snider

July 1, 1994

Phillip Moreland, Branch Chief Planning, Environment, Landa and Recreation (931) Arizona State Office Sureau of Land Management 3707 North 7th Street P. O. Box 16563 Phoenix, Arizona 85011

RE: Arizona Statewide Wild & Scenic Rivers Draft LEIS Comments

Dear Mr. Moreland:

Phelps Dodge Morenci, Inc. (PDMI) appreciates the opportunity to review and provide comments to the BLM for consideration in the evaluation process of the Draft Arizona Statewide Wild & Scenic Rivers Legislative Environmental Impact Statement (LEIS). Comments provided by PDMI are intended to assist the BLM in review of the Draft LEIS and preparation of the Final Wild & Scenic Rivers LEIS. PDMI has remained an active participant throughout the Wild & Seenie Rivers evaluation process in the State of Arizona and trusts the BLM will find our comments constructive and beneficial in evaluation of suitability designation for river study areas addressed through this letter.

Three river study areas included in the alternatives analyses would have significant adverse socioeconomic impacts on PDMI if they are selected for inclusion in the Wild & Scenic River System. These proposed river systems include: 1) Gila Box: Lower San Francisco River, 2) Gila Box: Gila River, and 3) Bonina Creek. In addition, two river study areas addressed in the Draft LEIS alternatives would have similar adverse impacts on communities in Greenlee and Graham Counties that provide support services and an employee base for PDMI's operations if they are incorporated into the Wild & Scenic River System including: 1) Aravaipa Creek; and 2) Turkey Creek.

Comments provided on the Draft LEIS address general issues common to all alternatives, with the exception of the No Action Alternative, and specific comments on individual alternatives and their adverse impacts on PDMI, should they be chosen as the selected alternative in the Final LEIS.

Response 97 - 1: Please refer to general response # 2 (Economic Impacts).

General Comments

The BLM indicates in the Oraft LEIS that private land and water rights within river study areas identified as suitable for designation in the Wild & Scenic River System would be acquired. Both Grentlee and Graham Counties have a very small private land base for which to collect property taxes, the source of much of the funding for services provided to the residents of each county. Purchase of these private land holdings by the Federal government would further reduce the ability of local governments to provide the level of service desired by the communities in these counties. The formula used by the Federal government to determine the amount of money paid to county governments based on Federal land ownership was developed in 1976. This formula is outdated based on 1994 dollars.

Please explain how local county governments will not be adversely affected by the reduction of private land holdings and the associated property tax base within their boundary without having to increase the property tax level on homeowiters, ranchers, farmers, and other land owners.

2) Water rights is an extremely sensitive and controversial issue when associated with new regulatory programs proposed by the Federal government such as Wild & Scenic River designations. Loss of water rights to rivers as a result of Wild & Scenic River System designation will significantly impact industry, agriculture and marching in Arizona. The Druft LEIS states that water rights will not be taken from existing beneficial uses. However, the Draft LEIS also states that minimum instream flows will be established for river study areas that are designated as part of the Wild & Scenic River System.

Please explain how, on river systems like the Gila and San Francisco Rivers where all available water is adjudicated, minimum instream flow standards will be established without adversely impacting existing water rights.

3) The cumulative impacts of multiple layers of Pederal regulatory programs on land and water resources associated with the Draft LEIS should be evaluated. Currently, many of the river study areas are regulated as Wilderness, Nation Conservation Areas, Areas of Critical Environmental Concern, and Critical Habitat Areas. The addition of Wild & Scenic Rivers designation should be evaluated to determine the cumulative impacts placed on local communities as a result of multiple layers of land use regulations.

4) The Druft LEIS does not present a detailed socioeconomic impact assessment for any of the communities or counties in which river study areas are located. Cumulative impacts evaluated on a statewide baris tend to wash out impacts that are significant at the local level. A socioeconomic evaluation on a county basis should be conducted

Response 97 - 2: Please refer to general response # 6 (Land Acquisition).

Response 97 - 3: Please refer to general responses # 4 (Federal and State Water Rights) and # 5 (Instream Flow Water Rights).

Response 97 - 4: Please see response 97 - 1, above.

Response 97 - 5: Please see response 97 - 1, above.

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97-7

Mr. Moreland Draft LEIS July 1, 1994

for the affected counties in Arizona.

Specific Comments

There are several contradictions between information presented in tables and the text within the Draft LEIS. Examples of these contradictions include:

Pages 4 and 5 - The text states that adverse impacts would occur to mineral resource development as a result of the Proposed Action, the All Suitable and the Legislative Protection Alternatives. The Proposed Action identifies a total of 8,700 acres that would be withdrawn from mineral entry within categories of resources classified as moderate-to-high, moderate, and low-to-moderate locatable mineral potential. The All Suitable Alternative would adversely impact 12,200 acres and the Legislative Protection Alternative would impact 10,780 acres. Information in Table 2-G3 summarizes proposed management actions by alternatives and indicates that new mineral entry would be prohibited on 35,002 acres for the Proposed Action, 50,228 acres for the All Suitable Alternative, and 12,430 acres for the Legislative Protection

Page 76 - Under the "Cumulative Impacts on minerals development" section the conclusion is made that "The Proposed Action would have a minor adverse cumulative effect on minerals development."

Page 90 - Under the "Impacts on Minerals Development" section the conclusion is made that "The withdrawal of 10,997 acres from mineral entry under the implementation of the All Suitable Alternative would have an adverse impact on minerals development."

Page 104 - Under the "Impacts on Mineral Development" section the conclusion is made that "The implementation of the Legislative Protection Alternative would have a minor adverse impact on minerals development."

Information presented on the pages identified above seem too conflicting to allow for a comprehensive evaluation of the Druft LEIS alternatives. Apparent conflicts with data presented in tables and text should be clarified. Also, conflicts in what is considered to be minor adverse impacts versus adverse impacts should be addressed to assist the reader in understanding how the environmental consequences were determined.

Chart 1-1 on page 13 addresses the suitability assessment summary. Under the river
study area identified as the Gita Box: Lower San Francisco River, the BLM suitability
recommendation states that "The lower end of Segment 1 (3.4 miles) and Segment 2
(3.0 miles) are recommended as suitable. The upper end of Segment 1 (1.6 miles) is

Response 97 - 6: The correct figures appear in the final document.

Response 97 - 7: The rationale for the conclusion that the adverse impacts would be minor is discussed in the statewide legislative environmental impact statement under the section, in chapter 4, on cumulative impacts on minerals development.

Response 97 - 8: The difference between Chart 1-1 and Table 2-PA1 is that Chart 1-1 includes all river miles within the study area while Table 2-PA1 only includes Bureau of Land Management administered river miles within the study area. As explained on page 27 of the draft statewide document, in Table 2-PA1 the acreages displayed "are limited to public lands since wild and scenic river management actions apply only to lands under federal management."

Mr. Moreland Draft LEIS July 1, 1994

recommended as nonsuitable.

Table 2-PA1 on page 27 identifies Segment 1 of the Lower San Francisco River as 2.5 miles suitable for recreation designation and Segment 2 as having 2.9 miles suitable for recreation designation.

Conflicts with the information presented in Chan 1-1 and Table 2-PA1 should be clarified.

Wild & Scenic River designation for all river system or segments requires a one quarter mile corridor from either bank. Management constraints of this corridor area and lands that border upon or are adjacent to it restrict uses that may affect the protected uses of the corridor including visual impacts and noise resulting from mining activities such as open pit blasting. The Lower San Francisco River study area is immediately adjacent to the tailing impoundment facilities associated with PDMI's operations. These tailing impoundments are visible from the river and border the one 97-9 quarter mile corridor area. On-going and future expansions for the tailing impoundment facilities would be adversely impacted by wild, scenic or recreational designation of the Lower San Francisco River study area under the Wild & Scenic Rivers System. The tailing impoundment facilities are highly visible in the edge of the one quarter mile corridor. These adverse impacts would result from the potential termination of future use of the tailing impoundment facilities to prevent additional visual impacts if the Lower San Francisco River study area becomes designated as a Wild & Scenic River.

The tailing impoundments have been in operation for 54 years. Loss of use of these existing tailing impoundments preventing future expansion of these facilities to their designed capacity would adversely impact the economic viability of the milling operations and mining activities that support the mill, potentially terminating 810 jobs directly associated with PDMI. Other direct impacts would be the potential loss of jobs at smelters owned by Phalps Dodge Mining Company located in New Mexico that process the copper concentrate produced at PDMI. Indirect adverse impacts would potentially terminate 4,050 support oriented jobs in Arizona and 16,200 indirect jobs nationwide.

97-10

The socioeconomic impacts associated with the Lower San Francisco River designation would have a negative impact on the tax base of both Greenice and Graham Counties due to loss of employment opportunities. However, the Draft LEIS concludes that operation and expansion of the Morenci Mine will not be impacted by any of the action alternatives. This concern needs to be reevaluated in the Final LEIS.

4) Designation of Bonita Creek as a Wild & Scenic River would create multiple layers of

Response #7 - 9: Please refer to general response # 12 (Visual Impacts).

Response 97 - 10: Please refer to general responses # 12 (Visual Impacts) and general response # 2 (Economic Impacts).

97-11

Mr. Moreland Draft LEIS July 1, 1994

regulatory controls as a result of the existing designation of the river study area as a National Riparian Conservation Area. The Draft LEIS states that multiple management programs do not create adverse impacts because the regulation with the most stringent management program will take precedence. The example of mineral development is used to demonstrate how the Wild River designation would take precedence over National Riparian Conservation Area status by preventing mineral entry due to the Wild River status, regardless of the conservation area management guidance.

Phelps Dodge Mining Company is planning the future development of mining operations at its Lone Star copper deposit which potentially would be restricted from full development as a result of designating Bonita Creek under the Wild & Scenic Rivers System. Restriction of the development of the Lone Star copper deposit due to potential visual and noise affects to a Wild & Scenic Rivers System would create a significant adverse economic impact on Phelps Dodge and Graham and Greenlee Counties by eliminating high paying jobs associated with industrial activities and the loss of employment opportunities associated with indirect jobs. It is estimated that the Lone Star operations would provide 800 direct jobs within Graham and Greenlee Counties. An additional 4,000 indirect employment opportunities would be created as a result of the full development of the Lone Star copper deposit in the Stare of Arizona and an additional 16,000 indirect jobs nationwide.

In summary, PDMI has significant concerns regarding the designation of the Lower San Francisco River as suitable for inclusion in the Wild & Scetic Rivers System. Adverse impacts would occur to the operations at the Morenci Mine if the river study area became designated as a Wild & Scenic River. Therefore, PDMI supports the No Action Alternative for the Lower San Francisco River. Phelps Dodge has similar concerns regarding the designation of Bonita Creek as a Wild & Scenic River and the adverse impacts that would occur to the Lone Star development project. Therefore, PDMI supports the No Action Alternative for Bonita Creek.

PDMI worked with the BLM during the development of the Gila Box National Riparian Conservation Area supporting the agency in obtaining this management designation. However, throughout the conservation area designation, PDMI maintained its opposition to potential multiple management regulations of this resource area. Designation of the Gila Box National Riparian Conservation Area as a Wild & Scenic River provides no benefits in terms of management of the resource. Therefore, PDMI is apposed to the multiple regulatory management of the Gila Box National Riparian Conservation Area and supports the No Action Alternative for this river study area.

Response 97 - 11: Potential development of the Lone Star deposits may be visible from some points of the Bonita Creek and Gila Box segments under consideration in this document. The Wild and Scenic Rivers Act does not grant authority to the Bureau of Land Management to regulate or control activities on nonfederal lands. Please see general responses # 12 (Visual Impacts) and # 6 (Land Acquisition).

Mr. Moreland Draft LEIS

-6-

July 1, 1994

Thank you for the opportunity to be involved in this most important decision process. Please feel free to contact PDMI at any time regarding issues associated with the Draft LEIS or any other issues.

Very truly yours,

Timothy R. Snider

AZ LCV With the stage

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Arizona League of Conservation Voters

P.O. Box 40154 Tueson, Arizona 85717 (602) 622-2819

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16565 Phoenix, Arizona 85011

6 July, 199

Dear Mr. Moreland:

The Arizona League of Conservation Voters values the opportunity to comment on the Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (LEIS).

The Arizona League of Conservation Voters (AZLCV) is a statewide grassroots organization with the primary objective of protecting/preserving Arizona's last remaining natural areas. The membership of the AZLCV currently numbers over 3,500 individuals, almost all of whom are Arizona residents. Our membership is composed of citizens who enjoy activities such as: hiking, bird watching, nature study, camping, widdlife photography, backpacking, funting, fishing, and picnicking in natural undisturbed areas.

Perhaps no other type of natural area is appreciated or prized more in our anid state, than a riparian system. While Arizona once beasted numerous uncontaminated and undeveloped free-flowing creeks, streams and overs, saddy this is no longer the case. The evidence that Arizona's free-flowing riparian systems have been disappearing or catastrophically degraded is, unfortunately, everywhere we look. One need go no further than the fact that 26 of 31 native Arizona freshwater fish species are recognized by federal or state agencies as endangered, threatened, or candidates for listing. No other subgroup of widthir in Arizona is more imperilled, or more dramatically points to the urgency with which we need to respond.

While of all types of wildlife native fish indicate most strongly the necessity of immediate steps, most of our native fauna and flort are dependent on riparian systems to maintain viable populations. It is inconceivable that the growth of industries harmful to these areas will cease. Indeed, even without the further growth of these industries, their destructive impacts on Arizona's riparian systems must somehow be mitigated. Therefore, it would seem prudent to act now to protect those few remaining, natural free-flowing riparian systems, which against ever increasing odds, still maintain their original characteristics and biotic communities.

GENERAL COMMENTS - DRAFT LEIS

The AZLCV applauds the BLM for its efforts, cultuinating in its recommendation (Proposed Alternative) to include 27 segments in 13 river study areas as suitable for designation and protection under the Wild and Scenic Rivers Act. While the AZLCV supports, in general, the "Proposed Alternative" the AZLCY finds cause for concern in the apparent lack of substantive reasons, in its selection process, for not designating some of the river segments as suitable. A detailed consideration of our concerns regarding selected river segments follows below.

In reading the LEIS document closely, we found the section pp. 18-21 concerning the variety of special status categories particularly confusing and perhaps even misleading. Assuming a member to the public was interested in that status conferring maximum protection to a river; which special status category or combination of categories would offer this protection? Which special status categories are the most "secure," i.e. which are likely to endure and which are subject to administrative discretion?

Throughout the LEIS, the document gives the impression that ongoing management plans are somehow almost equivalent to protection under the Wild and Scenic Rivers Act. Given the relatively fluid nature of such plans, this is not the case, but the general public may perceive it that way lacking

COMMENTS ON RIVER STUDY AREAS

Of all the study areas recommended as not suitable for designation under the Wild and Scenic Rivers Act, the AZLCV is most concerned about that finding for Cienega Creek. Fully 2,500 AZLCV members live in or around Tucson, within a short drive of this unique and irreplaceable

Quoting from the BLM's "Empire-Cienega Resource Conservation Area" brochure. "Opportunities for recreation and nature study are limited only by your capabilities and desires. Hiking, careping, horseback riding, photography, painting, bird watching, bicycling, picnicking, and hunting are a few possibilities.* The BLM finding that "Recreation" is not an outstandingly remarkable value for this study area appears to be at odds with the BLM's own assessment via its other communications.

Cienega Creek is one of the last remaining and perhaps best examples of the cienega-river type of riparian system in Arizona. It is by definition an aquatic system. The fact that it is one of only a very few cienega-river type associations remaining in Arizona, should be more than enough to quality it under the outstandingly remarkable value of "Aquatic."

The outstanding biological community assembled in this unique area includes over 170 species of birds (BLM Brochure on Empire/Cienega RCA). H species of bats, 3 native fish species - Response 99 - 1: Please refer to general response # 9 (River Study Area Protection).

Response 99 - 2: Please refer to general response # 8 (Cienega recommended alternative).

413

page 3

with no exotics, and numerous species of other vertebrate animals. Many species within the above groups have special status.

This assemblage is supported by an equally impressive floral community due to the presence of its perennial stream flow in a high desert basin setting. Giant cottonwoods, Mesquite Bosques, Velvet Ash, Willows, Oaks and junipers complement an unusual association of native tall-grasses and marsh species. The area "supports some of the best examples of native grasslands in Arizona," (BLM Brochure on Empire/Cienega RCA).

Of particular concern for the future of this area is its valuable native fish fauna. Two of the 3 endemic fish species are listed either federally or by the state. It remains one of the very few riparian habitats in Arizona without exotic species. As the largest of 9 extant populations of the federally endangered Gila Topminnow it was found to be critical habitat by the U.S. Fish and Wildlife Service. Due to the endangered Gila Topminnow, Cienega Creek is the top priority for protection by the Desert Fishes Council. Future survival of the Gila Topminnow and ongoing reintroduction efforts in other localities might be compromised in the future without Clenega Creek's inclusion in the wild and scenic rivers system.

The anthropological significance of the Cienega Creek study area was well documented in research by Frunk W. Eddy (Masters Thesis, University of Arizona, 1958).

While the endangered status of the Gila Topminnow offers the area some degree of protection, it is arguebly only of a temporary nature. The AZLCV finds that the unusual combination of biological, recreational, aquatic, and cultural/historical attributes deserves the more permanent protection afforded by designation under the Wild and Scenic Rivers Act.

The Wild and Scenic Rivers Act was intended to preserve the few remaining, unique and natural riparian systems. The impetus for the Act itself was the wholesale disappearance of such systems due to the destructive modifications wrought over a relatively short period of time under modern human land utilization. Since the presence of threats is not required for a river to be suitable for designation, and since Cienega Creek is certainly eligible, the policy contained in the Act argues that it thould be protected. The BLM's suitability assessment, in the Cienega Creek see, seems to suggest that unless there is a reason that it must be designated, then the BLM is under no obligation to do so. This appears to be the reverse of the intent of the policy as outlined in the Wild and Seense Rivers Act.

The AZLCV respectfully requests the BLM revise its preliminary finding that Cienega Creek is not suitable for designation. We further request that Cienega Creek be determined suitable with the recommended designation "Securic."

CONCLUSIONS

The AZLCV, while primarily concerned with the inclusion of Cienega Creek in the wild and scenic river system, nevertheless recognizes that other riparian areas were perhaps too hastily excluded from receiving the "suitable" determination or received a recommended designation less protective that warranted (e.g. "recreational" instead of a more reasonable "scenic for the San Pedro River). We especially request reconsideration of the BLM determinations for the following river study areas: Hassayampa River, Virgin River, San Pedro River, Santa Maria River, Francis Creek and Bonita Creek.

While the BLM necessarily has a balancing act to perform, the AZLCV believes to achieve a fair balance one would have to begin 150 years ago. In that interim some estimate the loss of our original naturally functioning riparian areas to be as high as 95%. It would appear that the emphasis regarding riparian areas would better be placed on restoration instead of additional loss in the name of achieving a balance. The policy to allow restoration, or at least an end to continued loss, is in place.

Sincerely,

Booksen

Robert R. Beatson Executive Director

cc: Sen Dennis DeConcini Sen John McCain Rep. Sam Coppersmith Rep. Karan English Rep. Jim Kolbe Rep. Jon Kyl Rep. Ed Pastor Rep. Bob Stump Response 99 - 3: Please refer to general response # 1 (Alternatives).

414

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July 8, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizons State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

Re: BLM's Draft Arizona Statewide Wild and Scenic Rivers LEIS

Dear Mr. Moreland:

Bntlosed are comments being submitted on behalf of Phelps Dodge Corporation ("Phelps Dodge") on the Bureau of Land Management's ("BLM's") Arizona Statewide Wild and Scenic Rivers ("MSR") Legislative Environmental Impact Statement. The enclosed comments focus on four river study areas of particular concern to Phelps Dodge: Lower San Francisco River, Bonita Creek, Gila Box and San Pedro River. Phelps Dodge supports the No Action alternative for each of these river study areas for the reasons set forth in the attached comments, and urges BLM to reconsider its recommendations for WSR designation for those study areas.

Sincerely,

KIMPALL & CURRY, P.C.

Darva L. Moellenberg

Anclosure cc: Leo M. Pruett, Esq.

PHELPS DODGE CORPORATION COMMENTS ON THE BUREAU OF LAND MANAGEMENT'S DRAFT ARIZONA STATEWIDE WILD AND SCENIC RIVERS LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

Phelps Dodge Corporation ("Phelps Dodge") respectfully submits the following comments on the draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement ("LES") prepared by the U.S. Department of the Interior, Bureau of Land Management ("BLM"), dated April, 1994. These comments focus on four river segments proposed for designation under the Wild and Scenic River ("WSR") Act: Lower San Francisco River, Bonita Creek; Gila Box; and San Pedro River. Phelps Dodge supports the No Action Alternative for these four Study Areas.

Bonita Creek, Gila Box and San Pedro River

The Bonita Creek, Gila Box and San Pedro River Study Areas are located within Riparian National Conservation Areas (RNCAs) (LEIS at p. 20). As the BLM secknowledges (Bonita Creek Draft EIS at p. 2; Gila Box Draft EIS at p. 8), the purpose of a riparian national conservation area is "to protect, conserve and enhance the riparian and associated areas," including the recreational, cultural, scientific, aquatic, wildlife, archeological, paleontological, educational and scenic values of the area. WSR designation therefore would result in needless duplication of the existing RNCA protections. With respect to the specific river segments proposed for WSR designation:

Bonita Creek:

The Bonita Creek segment recommended for WSR designation as Recreational is located within one mile of future mining operations near Safford, in an area not yet fully tested for its mineral potential. WSR designation may restrict potential expansion of Phelps Dodge mining operations (particularly at the Lone Star copper deposit) and utility easements in the area, and may impose nondegradation standards on operating permits for facilities that may have visual or water quantity or quality effects. In addition, the City of Safford water supply, which is drawn from the collection gallery in Bonita Creek, would be adversely impacted by WSR designation.

Gha River, Gila Box:

The three Gita River, Gita Box river segments recommended for WSR designation (two as Recreational and one as Soenie) are immediately adjacent to and below Phelps Dodge's Morenci Mine in an area suitable for future development. Several utility lines, railways, roadways, and highway bridges are

Response 101 - 1: Please refer to general response # 7 (Multiple Designations).

Response 101 - 2: Please refer to general response # 12 (Visual Impacts).

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Phelps Dodge Comments on BLM's Draft Arizona Statewide Wild and Scenic Rivers LEIS Page 2

101-3

visible from much of the river corridor, as are the Morenci mine facilities and tailings dam. Designation of the Gila River, Gila Box segments may restrict the expansion of the Morenci mining operations or impede permitting those operations. The designation also may restrict water additions from other mining operations for transfer to Morenci, and the restrictions on utility easements in the area are onerous. Those restrictions could pose grave adverse economic impacts on the Morenci mine and surrounding community. Finally, the proposed designation is convary to the position taken by the Greenlee Public Lands Committee opposing any further restrictions on the waters in Greenlee Courty, especially restrictions which would adversely affect the custom, culture and economy of Greenlee Courty.

101-5

Phelps Dodge worked with the BLM during the development of the Gila Box RNCA, supporting the agency in obtaining the management regulations for the area. The resulting management plan and legislation designating the Gila Box RNCA were derived from carefully worked out compromises establishing that area including an agreement that further restrictions would not be imposed. Designation of the Gila Box RNCA as a Wild and Scenic River provides no real benefits in terms of management of the resource, but will adversely impact future operations of the Morenci mine, as well as the local economy.

San Pedro River:

101-6

The two river segments recommended for WSR designation as Recreational are approximately 15 miles downstream from Phelps Dodge's Bisbee mining operations. WSR designation, with the attendant nondegradation standards for visual impairment and water quality and quantity, could adversely impact the Bisbee operation if federal or state permits are required. Moreover, WSR designation could adversely impact industrial development near the international border.

II. Lower San Francisco River

The river of primary concern to Phelps Dodge is the Lower San Francisco River, which has two proposed segments located immediately adjacent to and below Phelps Dodge's Morenci operation. WSR designation of the Lower San Francisco River segments will restrict utility easements and impede expansion of current mining operations at Morenci. More specifically:

Response 101 - 3: Please see response # 101 - 2.

Response 101 - 4: Please see general responses # 4 (Federal and State Water Rights) and # 13 (Water Rights Severance and Transfer).

Response 101 - 5: Discussions of the draft management plan for Gila Box Riparian National Conservation Area are beyond the scope of this document. Management of the riparian national conservation area would continue regardless of wild and scenic designation.

Response 101 - 6: The two San Pedro River segments in the San Pedro Riparian National Conservation Area were created by the Arizona Idaho Conservation Act of 1988 (P.L. 100-696). Wild and scenic river designation would not affect additional water rights or limit operations at the Phelps Dodge Bisbee mine, 15 miles from the river study area.

Phelps Dodge Comments on BLM's Draft Arizona Statewide Wild and Scenle Rivers LEIS Page 3

The BLM conclusion that operation and expansion of the Morenci mine will not be impacted is not correct since there will be actual impacts of WSR designation on the Morenci mine. Private lands (593 acres) owned by Phelps Dodge make up 24 percent of the study area acreage and are identified for acquisition by the BLM. BLM acknowledges (Lower San Francisco River Draft EIS at p. 1) that the 1.8 miles of the proposed river segments that occur on Phelps Dodge lands are used as part of the mining operation at Morenci and in support of the tailing dams. Indeed, the tailing impoundment facilities are highly visible from 101-7 the edge of the river corridor. WSR designation could prevent future expansions of these facilities to their designed capacity, thereby adversely impacting the economic viability of the operations and surrounding community. Additionally, the loss of those future expansions arguably may constitute an unconstitutional "taking" because the investment made in reliance on the right to expand the operations could be destroyed. Finally, the river segments should not be considered suitable when major areas are utilized in active, growing, long-term mining operations.

2) The text (Lower San Francisco River Draft ElS at p. 2) indicates correctly that Phelps Dodge owns land in both segments proposed for WSR designation. This is followed by a statement that the parcel in the upper segment has been identified for acquisition by the BLM. In fact, parcels in both segments along the San Francisco River owned by Phelps Dodge have been identified for acquisition by the BLM. However, those parcels are used as part of the mining operation at Morenci which is inconsistent with BLM's expectation of acquiring the parcels from Phelps Dodge. Does the BLM propose that the tailing dams be moved elsewhere? BLM should more adequately and accurately address this issue in the

There are several contradictions between the text and the map showing the proposed action for the Lower San Francisco River Segments. For example, the text (Lower San Francisco River Draft EIS at p. 7) indicates that 3.4 miles of Segment 1 and the entire 3 miles of Segment 2, are suitable under a Recreational classification. The map (Lower San Francisco River Draft EIS at p. 8), on the other band, refers to Segment A (which we believe was incorrectly marked and is equivalent to Segment 1) as Recreational and Segment B (which we believe is equivalent to Segment 2) as Wild. In addition, the legend on the map is confusing because it indicates that private lands are marked as white, but no white sections are shown clearly in the study areas. White sections should be clearly indicated on the map to indicate the 593 acres of private lands (24%) of the total in the study area.

Response 101 - 7: Please refer to general response # 6 (Land Acquisition).

Response 101 - 8: Please see response # 101 - 7, above.

Response 101 - 9: The correct map appears in the final document.

Phelps Dodge Comments on BLM's Draft Arizona Statewide Wild and Scenic Rivers LEIS Page 4

4) The text (Lower San Francisco River Draft EIS at p. 6) essentially dismisses impacts from the Greenlee County airport, both present and future, despite future expansion that may include commercial jet aircraft. Flight patterns often may be close to or over the study area.

5) The text (Lower San Francisco River Draft EIS at p. 9) indicates that ongoing management actions already encompass nearly all of the actions that would be taken under WSR designation. Moreover, impacts on outstandingly remarkable values (Lower San Francisco River Draft EIS at p. 15) under the Proposed Action are essentially the same as those under the No Action Alternative. This indicates that WSR designation is largely a needless bureaucratic addition that will hinder efficient management of the area that already is occurring under the No Action Alternative.

6) The BLM proposal states (Lower San Francisco River Draft EIS at p. 22) that "the effects of the use of private lands adjacent to the Sudy Area for tailing dams at the Phelps Dodge mine at Morenci" were considered. Yet, there is no indication that private lands within the study area used as a part of mining operations were considered. Moreover, the BLM tersely states that any effects that were considered "were not considered significant." A more detailed explanation from BLM should be forthcoming, particularly since the U.S. Forest Service ("USFS") concluded in 1931 that the effects of WSR designation were significant even when they were less intrusive.

7)
BLM's identification of eight distinct outstandingly remarkable values (Lower San Francisco River Draft EIS at p. 16) is not supported by factual information and, thus, does not represent an objective evaluation of the Snady Area. BLM identifies the following specific outstandingly remarkable values in the Lower San Francisco River Shady Area: recreational, scenic, fish, wildlife habitat, cultural resource, geologic, and hydrologic. These 'values' are discussed below:

a) Scenic and Geologic - Worthwhile scenic and geologic values are contained in the Study Area, but they do not qualify as "outstandingly remarkable." It is doubtful that many visitors, current or future, would visit the area primarily for those values when there are better examples in the general area. In addition, the impact by Morenci mine operations on scenic values already is significant and will continue to increase in the future.

 Recreational - These values are worthwhile, but WSR designation would not enhance the values beyond those already provided by ongoing management. Response 101 - 10: Flight patterns are not a criterion considered in the process of determining wild and scenic river study area eligibility and suitability.

Response 101 - 11: Except for wild and scenic river management actions the no action alternative is similar to the recommended alternative. Please refer to general response # 10 (Comparisons).

Response 101 - 12: The cited reference is from the eligibility evaluation. Please refer to general response # 3 (Eligibility Determinations).

Response 101 - 13: Please refer to general response # 3 (Eligibility Determinations).

101-14

Phelps Dodge Comments on BLM's Draft Arizona Statewide Wild and Scenic Rivers LEIS

- Fish The information on fish (Lower San Francisco River Draft ELS at p. 18) indicates that the river segments contain "few native species, low populations, and a lack of rare species." Based on that factual background, the BLM cannot reasonably find that the Study Area has outstandingly remarkable values for fish.
- Wildlife Habitat The river segment is important as a perennial stream in a semi-arid area, but BLM acknowledges (Lower San Francisco River Draft EIS at p. 18) that it "is not known to regularly support threatened and endangered species or regionally significant wildlife." Moreover, "the poor quality of riparian vegetation limits the diversity and population of breeding birds" in the area. Despite those admissions, BLM identifies a high potential for development of aquatic and riparian habitat, ignoring the main reason for the limited riparian areas: periodic devastating floods on the San Francisco River that remove vegetation, including large trees, from the narrow floodplain terraces. Thus, wildlife habitat values are not outstandingly remarkable and there is limited potential for them to become
- Cultural and Historic Resources The occurrence of temporary hupting or gathering camps, historic beaver trappers or transportation routes for others in the general area do not support outstandingly remarkable values. If they did, how would BLM evaluate an area such as Toruo National Monument?
- Hydrologic Resources The mere existence of a perennial stream in a semi-arid area is not outstandingly remarkable. Clifton Hot Springs, just upstream from the proposed segment, contributes 30% to 50% of the salts in the San Francisco River. The result is that while the San Francisco River contributes about the same amount of water as the Gila River, it contributes approximately twice the salt load. This does not support outstandingly remarkable hydrologic values.

Although the BLM proposal for the Lower San Francisco River includes a handful of references, it ignores the major study completed by the USFS in 1981. That study concluded that the San Francisco River, including the areas addressed in the 1994 BLM proposal, should not be recommended for WSR designation. Why has the BLM ignored the USFS report? And, why did USFS make an opposite conclusion from BLM? Since the 1981 report, mining operations at Morenci have increased significantly, thereby increasing the impacts on scenic and other values in the BLM study area.

Response 101 - 14: Discussion of the U.S. Forest Service study of the Lower San Francisco River would be unwarranted in this document. The eligibility of the Gila Box: Lower San Francisco River study area for consideration as a wild and scenic river was determined in the final Safford District Resource Management Plan (1991). The resource management plan (page 455) cited a recommendation in the Nationwide Rivers Inventory published in 1982 by the National Park Service that the Gila and San Francisco Rivers should undergo wild and scenic river study. The joint study undertaken by the Forest Service and Bureau of Land Management was referred to in the suitability assessment (Lower San Francisco River, page 1).

Phelps Dodge Comments on BLM's Draft Arizona Statewide Wild and Scenic Rivers LEIS Page 6

The lack of reference to the USFS report and the absence of factual support for a finding of outstandingly remarkable values in the study area indicate that the BLM recommendation for Wild and Scenic River designation on the Lower San Francisco River is largely subjective. An objective evaluation of the values of concern would not support a recommendation for WSR designation and does not justify the significant adverse consequences that would be imposed on the Morenci mine and local economy.

III. General Comments

1) Several contradictions exist between the information presented in the table summaries and the text discussion of the same issue. For example, the text states that under all of the alternatives, except the No Action Alternative, lands with low-to-moderate, moderate, and moderate-to-high mineral potential would be withdrawn from mineral entry. BLM then concludes, without any explanation, that the impacts from the various land withdrawats would constitute either "minor adverse impacts" or simply "adverse impacts." BLM does not indicate the factors used to reach such conclusions, which appear arbitrary in light of the relatively small differences between the alternatives in the amount of land withdrawn. BLM should identify in detail and discuss the factors used in determining whether the adverse impact would be minor or otherwise so that readers can more

accurately evaluate the environmental consequences.

101-16

BLM indicates that private lands and water rights within the various study areas would be acquired, but does not thoroughly analyze the socioeconomic effects that the reduction of private land base would have on the local communities. For example, Greenlee and Graham Counties have a small private land base for the generation of property taxes to provide services. The purchase of private lands in these counties by the federal government would further reduce that taxable land base and would therefore reduce their ability to provide a level of service desired by county residents. BLM should more completely address how the local governments will not be adversely impacted by the reduction of private lands and the corresponding tax base, especially in light of the position taken by the Greenlee Public Lands Committee.

Response 101 - 15: The rationale for the conclusion that the adverse impacts would be minor is discussed in the statewide legislative environmental impact statement under the section, in chapter 4, on cumulative impacts on minerals development.

Response 101 - 16: Please refer to general response # 6 (Land Acquisition).

000103

7

SOUTHERN UTAH WILDERNESS ALLIANCE

Phillip Horeland, Branch Chief July 8, 1994
Planning, Environment, Lands and Recreation (931)
Arizons State Office, Bureau of Land Management
3707 North 7th Street
P.O. Box 16363
Phoenix, AZ 65011

Dear Mr. Moreland,

I am writing to express my concern about the Eureau of Lend Hanagazent's wild and scenic river recommendations for the Virgin River. SUMA strongly disagrees with the ELN's conclusion that the designation of the Virgin River as a study river will have no adverse impacts upon the outstandingly remarkable flash, wildlife, and squartic values of the river. In addition to the protection a river receives probibiting dams and impoundments, one of the primary benefits afforded under the Wild and Scenic Rivers Act is the creation of a wild and scenic river management plan. A river management plan prepared under the direction of the Wild and Scenic Rivers Act ensures the further degradation of the Sild and Scenic Rivers Act ensures the further degradation of the outstandingly remarkable values present in the river corridor.

Since its recommendation by the National Park Service in 1979 as a potential Mild and Scenic River, the Virgin River has faced a series of demaging impacts to its fragile ecceystem. As you are well sware, the Virgin River chuh has been listed as endangered, the desert tortoise has been listed as threatened, and the Virgin River apinedace has been proposed for listing as a threatened species by the US Fish and Wildlife Service. For the second straight year, the conservation group American Rivers has listed the Virgin River as one of the 10 most endangered tivers in North America. In short, not only are the unique ecological values of the Virgin River not being maintained by the SIM, but they are actually being degraded.

The BLM's management of the river in Utah and Arizona has proven that the designation of the Virgin River as a wild and scenic study river will not stop this apiral descent. Only a wild and scenic designation will prevent the continued decline of riperian resources through the creation of a management plan that addresses the impacts to the Virgin River scoeystem. It is obvious that the Arizona office of the BLM is shirking its responsibility to protect the outstendingly remarkable fish, wildlife, aquatic, and riperian values of the Virgin River as set forth in the Wild and Scenic Rivers Rot in an attempt to assuage the water development interests in Nashington County, Utah.

Marvalan (Att. Ingeria) (Class of Internating that Angelia) — annual (Class Read Floridae) — annual (Class Read Floridae)

THE CHARGED MAN

Response 103 - 1: A wild and scenic river management plan would not be developed until Congress acted to designate the Virgin River into the National Wild and Scenic Rivers System. Until that time continuing management actions identified in the wilderness management plan, resource management plan, and area of critical environmental concern management plan, identified in chapter 2, would be implemented.

103-1 I



SOUTHERN UTAH WILDERNESS ALLIANCE

The BLM should take the initiative to proactively manage the rasources of the Virgin River under the direction of the Wild and Scenic Rivers Ant. There is no credible reason to find the Virgin River as suitable for designation as a Wild and Scenic River and subsequently recommend it for further study. Should Congress wish to designate upstream segments of the Virgin River in the future, or study the river further before designation, it can elect to doo. Further delay in the protection of this river will only pave the way for further adverse impacts to this river's incredible scosystem. BUNA strongly believes that the Arizona office of the RIM should recommend to Congress that all of the Virgin River In Arizona be designated for inclusion in the Wild and Scenic Rivers System.

I also wish to express my concara regarding the lack of consideration of Kanab Creek as a wild and scenic river. Kanab Creek possesses outstanding scenic, recreational, geologic, fish, wildlife, ecological, and cultural values that the Alm has failed to consider in its lagislative BIS. Kanab Creek provides scenatial riparian and aquatic habitat for many species of fish, birds, terrestrial vartebrates, and macroinvertebrates in the Kanab Creek Middenness Area. Only through Wild and Social River designation can the BIM ensure that the resources in the wilderness area not degraded. The BIM has erringly overlooked Kayab Creek as a wild and scenic river in its eligibility and suitability considerations. The BIM should recommend all 80 miles of Kanab Creek below the Kaibab Painte Indian Reservation as suitable for wild and scenic river designation and be classified as a wild river.

SUMA also wishes to commend the BLM for its recommendation that all of the Paris River in Arizona be designated as a wild and scopic river.

Cincarely

Zechary Grankel Rivers Coordinator

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> > STATE OF BUILDING HAVE

Response 103 - 2: The eligibility of the portion of Kanab Creek under administration by the Arizona Bureau of Land Management was evaluated through the Arizona Strip District resource management planning process. Kanab Creek was determined to be free-flowing, but without any outstandingly remarkable values, rendering it ineligible. Please see general response # 3 (Eligibility Determinations).



000104

516 E. Portland Street Phoenix, Arzona 85004 602+254+9330 602+258+6533 FAX



SIERRA CLUB SOUTHWEST OFFICE

July 8, 1994

SUPPLEMENT TO SIERRA CLUB CONNENTS ON BLM WILD & SCENIC RIVERS ASSESSMENT

Submitted by Stacy Clawson-Damp and Dale Turner

<u>Virgin River</u>

104-1

424

We are deeply concerned with the recommendation to designate the Virgin as a Study River rather than to designate it into the system. The Virgin is a highly threatened river system and deserves the maximum protection evailable.

Further delays in designation will seriously jeopardize the outstanding values of the area including the scenic quality, fish and wildlife habitat, and aquatic and riparian features.

By waiting to designate the whole river, rather than just the Arizona segment, we risk losing two federally endangered fish species that are in immediate danger of extinction due to habitat loss. Although it is important to designate whole systems, it is possible to designate segments in Arizona first and add than and Newada at a later date. It is imperative that we do what we can Now to preserve this unique and precious resource by designating it as one of Arizona's Wild and Scanic Rivers. If we wait for Utah and Newada, it could easily be too late.

Bonita Creek

The entire 15-mile length of Bonita Creek within the Gila Box Riparian Rational Conservation Area is suitable and should be designated as recreational. The lower 6.9 mile segment contains the same nationally significant fish and wildlife habitat as the upstream 8.1 miles.

104-2

The four percels of "private" land cited as rendering the downstream reach unmanageable belong to the City of Safford and are held primarily to secure their water right. The four parcels contain only 2.4 river miles total, and only 0.6 of those river

Response 104 - 1: Please refer to general response # 1 (Alternatives).

Response 104 - 2: The Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

æ

104-3

miles would have road access under BLM's preferred management alternative for the region.

Operations of the city water system should not interfere with protection of the river, and protection of the river cannot, by law, interfere with the rights and operations of the city water system.

Hot Springs Creek

Contrary to the BLM assessment, this stream has national significance. It contains native populations of five native fish species and no exotic fish, an extremely rare combination.

Its inclusion within a BLM-designated ACEC does not offer protection comparable with a Congressionally-designated Wild river. Of particular concern, the ACEC is subject to administrative changes within the agency. It does not protect against future mining claims in the canyon and it does not provide a comparable instream flow protection.

Recent geologic studies have indicated that significant quantities of Water may be held in the volcanic rock underlying the Galiuro Mountains. This makes a tempting target for water developers who could easily drain the water table which supplies Hot Springs and Swamp Springs Canyons.

Swamp Springs Canyon

In 1981, the Arizona Natural Heritage Program identified the Redfield Canyon watershed, including Swamp Springs Canyon, as "one of the most important sites for protection of aquatic and riparian habitats in the nearly 40,000 square miles of Arizona."

This stream contains native populations of four fish species and no exotic fish. Its inclusion within a Bim-designated ACEC does not offer protection comparable with a Congressionally-designated Wild river. Of particular concern, the ACEC is subject to administrative changes within the agency. It does not protect against future mining claims in the canyon and it does not provide a comparable instream flow protection.

Paria River

We strongly support the inclusion of the Paria River in the Wild & Scenic River system, including the 28 miles recommended by the Arizona Strip Resource Management Plan and the additional 7 mile segment managed by the Department of Interior.

Response 104 - 3: Please see responses # 104 - 1 and 9 (River Study Area Protection).

Response 104 - 4: Please see response # 104 - 1.

Response 104 - 5: Please refer to general responses # 11 (Suitability Determinations) and # 1 (Alternatives).

We agree with the Arizona Strip District of the BIM that "managing the Paria River as a Wild and Scenic River would go together well with managing for the protection, preservation and public use of wilderness values."

The outstandingly remarkable values are many. Backpacking and equestrian trails are enjoyed year-round. Bramatic scenery invokes the feeling of entering a magical world. Sandstone architecture frames the canyon, as if beckoning to those who visit. And, plant and wildlife abound, including several state and/or federally endangered birds. Anasszi dwellings and petroglyphs, evidence of earlier inhabitants, are still visible.

The Paria River warrants maximum protection and the recommendation for Wild designation is well deserved.

Wright Creek

We strongly disagree with the BLM's proposed action to not list Wright Creek in the Wild & Scenic River System.

wright Creek is home to a the remains of the unique Cohonina culture, which dates back to 700 A.D. This is the only area where this culture's ancestry is found on BUM lands. We have an obligation to all Arizonans to do whatever is necessary to preserve our prehistoric sites.

Additionally, Wright Creek provides vital habitat for an atypical strain of longfin dace, a native fish.

The proximity of Wright Creek to Kingman offers the residents a well-deserved casis, a perennial stream bordered by cottonwoods and willows, providing an unusual scenic and riparian area close to town

104-6

Wright Creek deserves protection for its scenic and archeological values. We recommend that you reconsider your decision to exclude Wright Creek from the Wild & Scenic River System in Arizona.

Response 104 - 6: Please see response # 104 - 1.

EXPLORATIONS

ALL 12 1881

000105

Faxed to 602-650-0452 on July, 8, 1994

Phillip Noreland, Branch Chief Planning, Environment, Londs and Recreation Arizona State Office Bureau of Land Managment 3707 North 7th St. P.O. Box 16553 Phoenix, Az. 85011

Hello Mr. Moreland:

I welcome the opportunity to comment on the BLM Draft Arizona Statewide Wild & Scenic Rivers LEIS. The BLM has within its care, some great and beautiful segments of rivers that deserve complete protection.

I have some comments of a general nature with regards to Vild & Scenic Rivers. I also have comments with regards to rivers that I am vary familiar with. I would hope that the RLM would act on some of my comments and proposals.

INCREASED DEMAND FOR RECREATIONAL OPPORTUNITIES

In the next ten to twenty years the population of Arizona will increase dramatically. Also, there will be an increase of tourism. These increases will have a corresponding increases in the demand for outdoor recreational opportunities. Water based recreation here in the desert southwest will be the most sought after activity. Camping, hiking and river running will be ectivities that will be attracted by the streams in Arizona.

As the most highly visited areas reach their use capocity, demand will increase on "lesser" known places having water. Protection of these places for and from recreation use is important for long range planning of all State and Federal agencies.

In light of the historic degradation of streams and riparian areas here in Arizons, any place with running water is unique here in the desert. The wisdom to foresee the demand and see the unique and outstanding values inherent in all the steams nominated should be the attribute or at least the goal of the SLK.

MY PREFERRED ALTERNATIVE

In light of the above scenario. I prefer the ALL SUITABLE ALTERNATIVE. Plus, I should point out to the RLM that another megment of the Gila River should be added to the list. This segment of the Gila River is from Kearney, Az. to the Ashurst-Mayden Diversion Dam. I will discuss this segment later in this letter.

W.E., Inc. • P.O. Box 686 • Flagstaff, Arizona 86002-0686 • (602) 774-6462 or 1-800-2PADDLE

REGREATION 2000

Recently, I commented on the BLM Recreation 2000 directive from the Washington D.C. office of the BLM. I understood the funding cutbacks that the BLM is suffering through and the accordance impacts that that would have on the BLM's ability to properly manage it's recreational resources.

Recreation 2000 proposed to have the BLM join with other agencies (Federal, State and Local) and the private sector to manage the recreational resources on and adjoining BLM land. I feel that this is an excellent idea and has potential for being implemented on the Wild & Scenic Rivers identified in this LHIS.

Some segments of rivers were excluded from the Preferred Alternative because not all of the segments were in RLM land area. I question the fact that the BLM has contacted the various parties that hold land area along the segments of river. I imagine that the RLM has just looked at the maps and arbitrarily decided that management of that segment would be turned down by the other parties involved.

Can the BLN provide documentation that contact with the other parties has been made regarding joint management and provide the documentation that the parties have turned down the offer? Before a final LBIS is printed, I would like to see that documentation.

THE UPPER GILA BOX AREA

105-1

105-2

105-3

105-4

The San Francisco River has been proposed for inclusion without the upper 1.6 miles as had been proposed by the Arizona Rivers Coalition. Has the RLM contacted the parties that own that 1.6 miles of lend along the river and select them about commanagement? I would hope that an attempt has or will be made to try for commanagement.

The Gila Box has been designated a National Riparian Conservation Area. But that does not give it the full protection that would occur under the Vild & Scenic Rivers Act. At present a management plan in still in formative stages and might not insure full protection when finally created.

Bonita Creek was added to the list that ARC had proposed. I am happy that the BLN had done this, but I do wish that the BLN would include more wileage from the Lee Trail Road to the confluence with the Gils River. The city of Emiford should be approached to co-manage Bonita Creek. It would be of a benefit to Emiford that the atream where it's drinking water comes from is fully protected.

Response 105 - 1: This document deals only with the environmental impacts of implementing Wild and Scenic River designation alternatives on land administered by the Bureau of Land Management. The Bureau of Land Management has no authority to regulate, designate or plan activities on nonfederal land. The Bureau of Land Management would encourage public involvement in the development of management plans for rivers designated by Congress.

Response 105 - 2: Please refer to general response # 1 (Alternatives).

Response 105 - 3: Please see response 105 - 2, above.

Response 105 - 4: Please refer to general response # 3 (Eligibility Determinations). Also, the Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

THE LOVER GILA RIVER

The lower Gila River from Coolidge Dam to Amburat-Hayden Diversion Dam is the only section of river, other than the Colorado River that provides river running recreation in the State of Arizona during the summer months. The San Carlos Irrigation District relemses water from April to October in sufficient quantities for river runners to float and play on. All of Arizona's rivers are basically floated on in the apring when the snow melts and provides sufficient flows.

105-5

Therefore, the BLW must consider this whole section of river for possible inclusion into the Wild & Scenic Rivers Bill.

The Reedle's Eye section of the Gilm River from Coolidge Dow to Dripping Forings Wash should be kept under interim core as a potential candidate for inclusion into the Vild & Somic River system. At present the Sen Carlos Apache Tribe is sumplicious of any federal Action that could impact it's water rights. But that opinion might change in the years to come, if they can be shown that designation would not affect their water rights. The BLN should initiate further dislogue with the San Carlos Apache Tribe.

The Dripping Springs to Winkleman section should extend all of the way into the Town of Winkleman. The BLK should initiate discussion with the Town of Winkleman to possibly co-manage the river in this section.

The section from Kearney to Ashurat-Hayden Dam should be included as a recreational segment for Yild & Scenic status. The Town of Kearney should be contacted by the BLM to see about co-menegement there also.

I thank the RLM for this opportunity to review my comments and proposals. I would like to speak with you about these issues in the near future. Please call me, so that we may schedule a date and time to seet.

Sincerely,

Ceorge A. Maraik, President Vorldwide Explorations, Inc. Response 105 - 5: Please refer to general response # 3 (Eligibility Determinations).

Stone Container Corporation

ML 11 (94 000108

Forest Products Division

PO. Drawer 450 Snowhake, Arizona 85937

July 8, 1994

602 536-4314

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3767 North 7th Street P.O. Box 16563

RE: Artzona Statewide Wild and Scenic Rivers Legislation

Dear Mr. Moverlands

Stone Container Corporation wishes to comment on the Draft Environment Impact Statement on the Proposed Action to recommend 14 rivers to Congress as suitable for inclusion in the National Wild and Scenic Rivers System.

After extensive analysis it is Stone's determination that the proper choice for all of the 28 rivers under consideration is the No Action

Our review of the environmental impact statement does point out that many of the rivers possess one or more highly desirable attributes such as acenic, recreational, geologic, fish and wildlife, cultural, or other similar values. But it is clear that none of these vivers possess "outstandingly remarkable" features as required by the National Wild and Scenic Rivers Act (sec.1(b)) to justify recommendation as suitable for listing.

All twenty of the study areas have atream segments with perennial streamflow. However, eight of the study areas have reguents with Intermittent streamflow. Two of the study areas have perenntal stress flows that as are regulated by upstress dans.

Water quality ranges from poor to unique. Three rivers have poor quality; eight have acceptable water quality; three have good water quality; and only three are designated as unique waters under state Response 108 - 1: Please refer to general response # 3 (Eligibility Determinations).

Phoenix, Arizona 65611

The reaches of three study areas are located in wilderness areas and protected by federal reserved rights, ten are covered by both federal and State rights, then have only state rights claimed, while the remaining four rivers and many proceeding study areas are designated as or administered under District Resource Management Plans, Resources Conservation Areas, Habitat Management Plans, Areas of Critical Environmental Concern, Riparian National Conservation Areas, Riparian Management Plans and Ecosystem Management Plans.

Following is a breakdown of the twenty river study areas under consideration:

Agus Pris

The Aqua Fria River study area is a perennial flow within an intermittent stream. The water flow is adminal with only a fair/good water quality rating. Presently it receives protection under the Black Camyon Habitat Management Plan and the Agua Fria Grasslands Ecosystem. The Arizona game and Fish Department is a partner in coordinating management of this resources.

Aravaipe Creek

Aravaina Creek is entirely within the Aravaina Camyon Wilderness. The study area is also encompassed within the Aravaina Camyon/Turkey Creek Special Recreation Area.

Big Sandy

The southern segment of the Big Sandy passes through the Arrastra Mountain Wilderness Area. The northern portion has designated as an Area of Critical Environmental Concern administered under the Kingaan Resource Management Plan.

Bill Villiums

The water flow is regulated by dam releases and the quality of the water is rated as acceptable. A large portion of the study area flows through the Rawhide Mountains Wilderness and Swamea Wilderness. Portions are also proincied under the Three Rivers Riparian Area of Critical Environmental Concern and the Bill William Riparian Management Area.

Bonita Creek

The Arizons Department of Environmental Quality designated Bonita Creek as a Unique Water under Arizona State Law. The Arizona Depart Wilderness Act has designated this portion as a Ripartan National Conservation Area reserving a quantity of water sufficient to achieve the stated purposes of the riparian national conservation area. The lower four miles may become critical habitat for the endangered taxorback sucker.

Burto Cree

The Arizona Department of Environmental Quality designated Barro Creek as a Unique Water under Arizona State law. The Bureau of Land Management has a Unique Waters compilate somitoring program on Barro Creek. A segment of the study area flows through the Upper Burro Wilderness Area. The other segments are listed as a Cultural Area of Critical Environmental Concern designated in the Kingsan Resource Management Plan. Segments of this river are managed by the U.S. Fish and Wildlife Service, U.S. Geological survey, Prescott National Forest, Arizona State Land Department and the Bureau of Land Management.

Clemera Creek

Stream flow is negligible and water quality is rated as acceptable. The entire area is in the Empire/Clemega Resource Conservation Area managed by the Bureau of Land Management under the Safford District Resource Management Plan.

Prancis Creek

The Arizona Department of Environmental Quality designated Burro Creek as a Unique Water under Arizona State law. Francis Creek Flows along the northern boundary of the Upper Burro Creek Wilderness Areas. A small portion is in the Burro Creek Riparian and Cultured Area os Critical Environmental Concern. Another segment flows through state lands. The Environmental Impact Statement does not foresee any future negative impacts.

Gila Boo

The Gila Box Riparian National Conservation Area reserves over 90% of the atream flow for riparian national conservation purposes. The study area is proposed as Critical Habitat for the endangered Razorback sueker.

Bassayampa River

Water quality is poor. Seventy-five percent of the river is managed by the State of Arizona and Bureau of Lund Management. A portion is within the Massayampa River Canyon Wilderness Area. The entire river is within the Black Canyon Mabitat Management Plan.

Bot Springs

Water quality is rated high, but the flow is negligible. The study area is within the Hot Springs-Swamp Springs Watershed Area of Crifical Environmental Concern. This area is managed under the provisions of the Maleshoe Encaystem Management Plan. Several natural resource conservation districts, the Soit Conservation Service, Bareau of Land Management, Forest Service, county and city governments, the Nature Conservancy and others have infitiated a resource management process.

Lower San Francisco

The water quality is rated as acceptable. The lower portion is within the Gila Box Riparian National Conservation Area. The U.S. Forest Service manages the majority of the upper watershed.

Middle Gila

the water quality is rated as acceptable. Twenty Nine percent of the study area is in the Meedler Eye Wilderness. The study area is encompassed by the Christmas Special Recreation Management Area.

Part.

Poor water quality. The entire scenic rivers study area is within the Paria-Verwillion Cliffs Wilderness Area and Paria-Eanab Creek Habitas Namagement Plan.

5m Pedro

The study area is within the San Pedro Riparian National Conservation Area and designated as an Area of Critical Environmental Concern.

Santa Maria

The water quality is rated acceptable. The Eingman Resource Hanagement Plan provides direction for the study areas. Apart of the stream flows through the Arrastra Mountain Wilderness and through the Santa Maria Area of Critical Environmental Concern. Wildlife populations and habitats are managed in accordance with the Lower Cita Morth Habitat Management Plan.

Swaap Springs Campus

This study stea is completely within the Redfield Canyon Wilderness. The area is operated under the provisions of the Maleshoe Ecosystem Management Plan.

Turkey Creek

Water quality is raited acceptable. The Turkey Creek study area is in the Turkey Creek Riparlan Area of Critical Environmental Concern and is bordered on the west by the Arawaipe Caryon Wilderness.

Virgin River

the water quality is rated poor. The entire area is within the Virgin Area of Critical Environmental Concern and is partially within the Paiute and Boaver Das Mountains Wilderness Area.

Vright Creek

Water quality is rated as good. The Wright and Cottonsmod Creeks Riparian and Oultural Area of Critical Environmental Concern admintscered by the Kingman Resource Management Plan.

Under the No Action Alternative current management practices would

Repeatedly the EIS states the No Action Alternative would have no direct adverse impacts on outstandingly remarkable values. Additionally, the EIS recognizes that the remarkable values would be protected by ongoing management actions.

Stone is cognitant of benefits derived from a designation under the Wild and Scenic Rivers Act. However, those benefits are a result of exercising discretion in selecting rivers or river segments. To breaden the designation to include the segments analyzed in the BiS would dilute the significance of the Wild and Scenic Rivers Act.

108-2

Stone is confident that current management actions and area designations are more than sufficient to provide extensive protection for these valued resources. It is therefore Stone's request that the Mo Action Alternative be selected.

Sincerely,

Herry M. Druzy

Response 106 - 2: Please refer to general response # 1 (Alternatives).

TUCSON

conservation education

recreation

Bill Civish

BLM Safford District

resources at hand.

Sincerely yours,

Doug Koppinger Conservation Chairman

AUDUBON 711 14th Ave. SOCIETY Safford, AZ 85546 Dear Mr. Civish; On behalf of the 2,500 member families of Tucson Audubon Society, I would like to strongly encourage you to propose Cienega Creek for Scenic River status. I think you would agree it has the qualities that merit this designation. It is a natural gem located just a short distance from three-quarters of a million people and it deserves the best protection we can give it. While it may have the protection mandated under the Endangered Species Act, that is subject to change based on Congressional reauthorization of the Act or changes in the status of the Gila Topminnow. What happens if the topminnow is dropped from the Threatened or Endangered list or its population at this site is wiped out? Clearly, the creek would be still deserving of Scenic status because of the exceptional Audubon Nature Shoo riparian and grassland ecosystems occuring there. 300 E. University Potential water withdrawals that could threaten the streamflow also need to be considered. Shouldn't we be building the strongest case possible for protecting the #120 Tucson, Anzono 85705 natural assets of this site? It seems unquestionable to me that a Scenic River designation can only strengthen the long-term protection of Cienega Creek and help defend it against the almost inevitable conflicts that are going to develop due to 602/629/0510 Arizona's uncontrolled and unplanned population growth. Nearby mineral development potential may also portend future conflicts that need to be planned for. Since the National Wild and Scenic River System was designed to protect areas of this quality, it should be designated as such. Relying on protection under other laws and District or State BLM directives would be acceptable and sufficient if the river did not qualify for Scenic designation. We should fully utilize the protection

> much has been invested in establishing this area and too much is at stake in terms of natural resources to not ensure that it has the highest and most appropriate protection available. This is why the National Wild and Scenic River System was established. Let's utilize it as best we can. Thank you for your interest JUL 0 5 1994

> BLM showed great foresight in creating this conservation area a few years ago.' Too

M 15 1934

000113

1 July 1994

Response 113 - 1: Please refer to general response # 8 (Cienega recommended alternative).



000114

Grand Canyon Chapter - Arizona Palo Verde Group

Phil Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, Bureau of Land Management P.O. 16563 Phoenix, AZ 85011

Dear Mr. Horeland:

I am writing the Sierra Club, Falo Verde Group, comments for the Draft Arizons Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement. The following comments are taken from Volumes 1 and 2; they are as follows:

Aravaica Creek As the proposed action is the only alternative and the segment considered is in a wilderness area, the proposed action is suitable.

Our concerns are that the surface disturbance as described in the archaeological description would also apply to the mineral estate for mining even though surface rights are exempted from mining.

Please consider C. ALL SUITABLE ALTERNATIVE. Burro Creek drains a mining area and forms, as do its tributaries, large and deep of water. It begins at 4400' and flows into the Big Sandy River. Burro Creek is a perennial river with large reservoirs of water contained the numerous pools. The surrounding pink-colored granits canyons are some of the most spectacular in Arizona

Big Sandy Llver Please consider C. ALL SUITABLE ALTERNATIVE. This stream is perennial with intermittent stretches. It passes through the Arrastra Mountain Wilderness and is part of the Three Rivers Riparian Area of Critical Concern. These three rivers are the Big Sandy, Santa Maria and Bill Williams. This complex is one of the most extensive and significant remaining desert riparian ecosystems in Arizona. The Big Sandy is also home for bald eagles and peregrine falcons and provides water to Alamo Lake.

Response 114 - 1: Please refer to general response # 1 (Alternatives).

Response 114 - 2: Please see response # 114 - 1.



Grand Canyon Chapter - Arizona

Hill Williams Diver

As the proposed action is the only alternative, the proposed action is suitable.

The Bill Williams Riparian Management Area includes the river corridor from Alamo Dam downstream to the eastern boundary of the Havasu Mational Wildlife Refuge. The recreation potential of the navasu rational wildlife column. The tastestant possible is high as the river approaches Lake Havasu where watercraft are in use and fishing is major economic benefit. The Bill Williams River drainage contains the fourth highest diversity of raptors

Bonita Creek

Please Consider C. ALL SUITABLE ALTERNATIVE. Bonita Creek is habitat for three federally-listed endangered

fish species. Its principal uses are for recreation and water supply for the Town of Safford. This stream has its source in the San Carlos Indian Reservation and so far has an uninterrupted supply of water. It is within the boundaries of the Gila Box

Riparian National Conservation Area.

114-3

Please consider C. ALL SUITABLE ALTERNATIVE. Cienega Creek supports a large marsh/riperian habitat by a

perennial water supply. The endangered Gila Topminnow and native Gila chub and longfin docs are in this stream.

Please consider C. ALL SUITABLE ALTERNATIVE.

Francis Creek is another one of the beautiful streams that

originate in the mining area near Burro Creek. It also flows through pink-colored granita mountains and forms large and deep pools of water. It joins Burro Creek and is an important water

aupply for the town of Baghdad. Burro Creek, Francis Creek, and Boulder Creak would benefit from wild and scenic river designation as the water quality would potentially be improved. These streams are in contact with abandoned mines and wine

tallings that contribute to high concentrations of minerals and

Gila River/Gila Box/San Francisco River (lower) Please consider C. ALL SUITABLE ALTERNATIVE.

It is to be noted that the inclusion and discussion of the San

Francisco River is not in volume two of the Appendices. This river, however, is listed in a tabular form on many pages of the

summary volume of the three volume IETS set. It is hoped that

even without a description, the San Prancisco is somehow included in the ALL SUITABLE ALTERNATIVE which is our desire.

Response 114 - 3: Please see response # 114 - 1.

Response 114 - 4: Please refer to general response # 8 (Cienega recommended alternative).

Response 114 - 5: Please see response # 114 - 1.

Response 114 - 6: It is possible that there was an omission in the printed copy you received. However, Volume 2 of the draft river appendix included a 35 page section on the Gila Box: Lower San Francisco River. The all suitable alternative was considered along with the proposed action and no action alternatives.



Grand Canyon Chapter - Arizona

114-7

Please consider C. ALL SUITABLE ALTERNATIVE.
The box canyon of the Hassayampa is worth wild and scenic designation without any other considerations. Righ basaltic cliffs rise vartically 600' and stretch for a length of one half mile. The origin is in the Bradshaw Mountains near Prescott at 5000' elevation. The Hassayampa flows through the Hassayampa Wilderness at low slevations and through the Prescott National Froest of Ponderosa Pines at high slavations. The Hassayampa could use any protection it could get as it is rapidly being urbanized from Wickenburg north to Prescott. This river is the water source for the Mature Conservancy's River Preserve.

San Pedro River

Hassavanna Liver

Please consider C. ALL SUITABLE ALTERNATIVE.
The main concern for this river is the ground water draw-down by
the City of Sierra Vista. The water to support the San Pedro
Riparian National Conservation Area has been publicized in many
newspapers. It is the home of the threatened and endangered (T &
) Millow Plycatcher. The need to fence out cattle is important
for the survival of the unique riparian habitat. Photographs
showing the contrasting fenced/non-fenced vegetation are
dramatic. Cattle grazing interests are exceptionally reluctant
to give up their water rights. Only two of thirteen native fish
remain and are T & E species. The North American Free Trade
Agreement should work to increase the supply of water at the
headwaters in Mexico. The increase in population at Fort Huachuca
resulting from military base reorganization and closure should
create a requirement for water development before additional
expansion. The riparian forest along the San Pedro River is the
most recognizable feature of the area. Implementation of the All
Suitable Alternative would prohibit construction of impoundments,
diversions, straightening, riprapping and other modification of
the water way would protect the outstandingly remarkable scenic
values by ensuring the waterway would remain unchanged.

114-8

Santa Meria River

Please consider C. ALL SUITABLE ALTERNATIVE.

The added benefit to this 21 mile long segment (A) is that it is in the Arrastra Mountain Wilderness area. As with any desert stream or river, adequate water for stream flow is marginal. The Santa María River is a perennial stream with intermittent stretches. This river furnishes water to Alamo Lake, a major fishing lake in Arizona. The riparian erea is home to nesting bald eagles and the T & willow flycatcher in addition to longnosed bats. Designation as Wild and Scenic would improve the water resources.

Response 114 - 7: Please see response # 114 - 1.

Response 114 - 8: Please see response # 114 - 1.

Response 114 - 9: Please see response # 114 - 1.



Grand Canyon Chapter - Arizona

114-10

Turkey Creek
It is vital that this segment is given Wild and Scenic designation as it outside (borders) the Araveipa Canyon Wilderness Area only on the west side.

Thank you

Tom Lazzelle for the Sierra Club, Valo Verde Group

Response 114 - 10: Please see response # 114 - 1.

Letters from individuals

440

000001

602-742-4450 Monday, Merch 28, 1994 6056 W. Oracle Jaynes Tucson, AZ 85741

MER 3 1 1004

Phillip Moreland, Branch Chief, Planning, Environment, Lands and Recreation (931) Arizona State Office, Eureau of Land Management 3707 Worth 7th St. PO Box 15563 Phoenix, AZ 85011

In re: Count One (1) wote for ALL SUITABLE Dear Wr. Moreland,

Thank you for DRAFT arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement. As well as the two (2) additional volumes detailing impacts on twenty (20) Scenic rivers.

I am one of your approximately 1,000 people on the wild and scenic river mailing list in the General Public category. I understand that what remains to be protected among rivers is and riperian habitats are less than low of all rivers.

I want the all suitable alternative.

I am opposed to grazing on public land. I am opposed to longing public land. I am opposed to Forest Service "sales" (at a loss) of public timber, Yes, I am opposed to mining uranium near the Grand Capyon; even opposed to breaking new ground for any additional mines.

Please do not choose anything less than ALI STITABLE, because you feel you need to compromise. 50/50 is a compromise. Half of 10% is not a compromise. I want it all for the general public, for your children and my children and grandchildren.

Thank you.

Mangar Tohuson

ONDS 44

PUTLIP HORELAND, BRANCH CHIEF PLANNING, ENVIRONMENT, LANDS AND RECREATION (931)

PUTLIP HORELAND, BRANCH CHIEF PLANNING, ENVIRONMENT, LANDS AND RECREATION (931)

POT LEND HEARD CHIEF PROBLEM OF LAND HORAGENERY BY A STATEMENT ST

Response 5 - 1: Please refer to general response # 1 (Alternatives).

MAY 0 \$ 1964

Phillip Moreland, Branch Chief
Planning, Environment, Lands and Recreation (931)
Arizona State Office
Bureau of Land Management
3707 North 7th Street
P.O. Box 16563
Phoenix, AZ 85011

Dear Mr. Moreland,

I wholeheartedly support the All-Suitable Alternative for all of the river and stream segments currently under study for inclusion on the Federal list of Wild and Scenic Waterways.

My reason is simple: less than 10% of Arizona's riparian areas remain relatively unspoiled by human impact. Something must be done!

I see using the teeth of PL 90-542 as the only means for protecting what's left for future generations.

In a day where many citizens are leery of politics and political meddling in local issues, I hope people look with open minds upon your efforts. The Wild and Scenic Rivers Act is good legislation that finds the balance between economic necessities, responsible recreation and riparian protection.

Bob Williams
1185 Middlebrook Rd.
Prescott, AZ 86303

4151 S Mc:pomene Way Tucson, Az. 85730 May 17, 1994

Phil Moreland Bureau of Land Management Arizona State Office 3703 North 7th Street Phoenix, Az 65014

Dear Mr. Moreland:

Since I will be unable to attend the BLM hearing on Wild and Scenic Rivers designation in Tucson on May 23, 1994 I'll express my comments in this short note.

We must protect our biologically important rivers in Arizona. At the hearing in Tucson you'll hear all the various reasons why these rivers must be protected by the federal Wild and Scenic Rivers Act many times. I am all for it.

7-1
The BLM has done a good job in general in our southern Arizona. The omission of the Cienega Creek from any designation, though, is unforgivable. You'll hear about this at the meeting too. Let us designate Cienega Creek as "Scenic", because that is how it deserves to be onted

Please record my voice as one in favor of most, it not all, rivers in Arizona being designated for protection by the Wild and Scenic Rivers Act.

Sincerely,

Maurice Schlossberg

Response 7 - 1: Please refer to general response #8 (Cienega recommended alternative).

800000

May 20, 1994. Dear Mr Morland I will be unable to attend the ist on choosing areas that have been chesen be recommended to Congress would also like to ask that Cinaga Creek be lasked at again for possible Scenic status, of feel that it is very important that this area receive pretiction, as it is one of the last examples of a relatively indact Cienega, and these areas are of such great importance not only to birds and fish buch as the Gila rutto jungme of this warningot. organisms as well. It is one of the lost whate utreams to be without non- native fish species, and it is important to keep it that way Thank you for your attention. - (overs)

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	Response 8 - 1: Please refer to general response	
	Response 8 - 1: Please refer to general response # 8 (Cienega recommended alternative).	
	Response 8 - 1: Please refer to general response # 8 (Cienega recommended alternative).	

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Response 9 - 1: Please refer to general response #8 (Cienega recommended alternative).

REF 2.5 1994

Mr. Phil Moreland Branch of Planning Az State Office-BLM Phoenix, Arizona 85014

David L. Wolf RI. 4 Box 716 Flagsleft, AZ 86001-9301 (602) 774-8720

000012

Dear Mr. Moreland:

Below are my comments on the Arizona Stalewide Wild and Scenic Rivers Legislative Environmental Impact Stalement.

Aqua Fria- I support the proposed alternative.

Aravalpa- I support the proposed atternative.

Big Sandy- I support the all suitable atternative.

Bill Williams- I support the proposed alternative.

Bonita Creek- I support the all sullable alternative.

Burro Creek- I support the all suitable alternative.

Clenega Creek- I support the all suitable atternative.

Francis Creek- I support en all sultable alternative.

Gila Box- I support the porposed alternative.

Hassayampa- I support the all suitable alternative.

Hot Springs Canyon- I support the all suitable alternative.

San Francisco- I support the proposed alternative.

Middle Gila- I support the proposed alternative.

Paria- I support the proposed alternative.

San Pedro- I support the proposed alternative.

Sanla Maria - I support the all suitable allemative.

Page 2- Comments on Wild and Scenic

Swamp Springs Carryon- I support the proposed alaternative.

Turkey Creek- I support the all suitable atternative.

Virgin River- I support the all suitable atternative.

Wright Creek- I support the all suitable alternative.

Sincerely.

David L Wolf

Mr. Phil Moreland Bureau of Land management Arizona State Office 3703 N. 7th St. Phoenix, AZ 85014

Dear Mr. Moreland:

I was delighted to learn last week that BLM is drawing up plans to protect parts of six southern Arizona rivers on BLM land from further development. I was dismayed, however, to learn that a 10.3 mile segment of Cienega Creek was excluded from the list. As pointed out in an article in the Tucson Daily Star on May 21, 1994, the Cienega Creek wetland is one of the last and best examples of a relatively intact cienega, particularly as it has not been oppulated by non-native fish. This is especially important since the Gila Topminnow is an endangered specias. Given the short distance of the creek from Tucson, it should be protected for future generations of Tucsonians and others desirous of visiting a prístine wetlands unsullied by development.

Please include the Cienega Creek wetlands on the list of rivers to be protected on the Wild and Scenic Rivers System. Such a beautiful, endangered wetlands should be protected from all future development. Inasmuch as over 90% of the native riparian areas in Arizona have been lost, it is incumbent upon us to save and protect the remaining wetland areas, including Cienega Creek.

Sincerely

Backers B. Hilson

Barbara B. Wilson

cc. Senator Dennis DaConcini Representative Jim Kolbe Representative Sam Coppersmith Secretary Bruce Babbitt **Response 13 - 1:** Please refer to general response # 8 (Cienega recommended alternative).

13-1

#4Y 2 7 1994

O'Connell & Kroese, P.C. ATTORNEYS AT LAW 2195 EAST RIVER, SUITE 105 TUCSON, ARIZIONA 85718 (602) 577-7895 FAX 577-7108

Christopher M. O'Connell Kelth W. Kroese

May 24, 1994

Mr. Phil Moreland BURBAU OF LAND MANAGEMENT ARIZONA STATE OFFICE 3703 N. 7th Street Phoenix, AZ 85014

RE: Cienega Creek

Dear Mr. Moreland:

I am writing with regard to the BLM's designation of wild and scenic rivers in southern Arizona, and specifically with regard to Cienega Creek. I believe that Cienega Creek should be designated

I live in southern Arizona and it is sad, to say the least, to see the number of formerly free flowing streams and rivers that are now dry. Cienege Creek continues to run, and it should be protected. We have lost quite enough in southern Arizona already.

Thank you very much for considering this. I hope you will see fit to redesignate Cienega Creek to go along with the other excellent decisions made in southern Arizona.

PONNELL & KROESE, P.C.

KWK/ag

Response 14 - 1: Please refer to general response #8 (Cienega recommended alternative).

5132 East Ctrue street Lucion, aryona 85712 May 26, 1797 WY 21 1991

Mr. Phil Moreland 3703 Morth 7th Street Phaenix, arizona 85014

000015

Dear Mr. Moreland:

The certainly believe that Cienega Creek should be protected as "Scenie" because it is a very good example of an intact cienega and There are very few of those left in Arizona. Also, since Cienega Creek is one of our last streams with no non-native fiel, it is important for the survival of our native fiel.

Sincerely, Walter & Dorothy Pelick

Response 15 - 1: Please refer to general response # 8 (Cienega recommended alternative).

Daniel K. Nelson 2929 E 6th St. #133 Tucson, Arizona 85716 June 4, 1994

Phil Moreland Bureau of Land Management Arizona State Office 3703 North 7th Street Phoenix, Arizona 85014

Dear Mr. Moreland:

RE: CIENEGA CREEK

I would like you to designate the Cienega Creek area for "National wild 18-1 and Scenic River Designation". Our state is growing at an alarming rate and we need to gaurantee protection of our natural resources. Thank you.

Daniel K. Nelson

Response 18 - 1: Please refer to general response # 8 (Cienega recommended alternative). EXTRA

PAGE 6 - THE PLATFORM WIERLY - JUNE 1-JUNE 1: 1800

EXTRA

EXTRA

EXTRA

Saving Cienega

What's The Best Plan To Preserve One Of The Last Marshes in The Southwest Desert?

By J.E. RELLY

BY J. D. KELLY

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The history as that the provise impact on public lands has been horrendous," says Gall Peters,

The Wild and Scenic designation would print the seed for potential the need for the n personal two news of the contraction of the contrac

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Resource Conservation Area

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the of the stream one flowing
because water was directed years
ago for agricultural practices. "If
the wanted to reconnect the

To preserve the river,

The BLM will include public

19-1

JUN 9 5 1994

000019

2865 E. Alta Vista Tucson, AZ. 85716 June 3, 1994

Phil Moreland Bureau of Land Management Arizona State Office 3707 North 7th Street Phoenix, AZ. 85014

Dear Mr. Moreland:

I received your agency's draft EIS regarding Arizona's Wild and Scenic Rivers designation. While I think that the BLM did an admirable job of including and appropriately categorizing the streams in the southern part of the state with which I am familiar. I was surprised to see that Cienega Creek did not receive any designation. Given the facts that it is one of the few cienegas remaining in this part of the state, that it holds an impressive cottonwood-mesquite-ash gallery forest, and that it is home to a wide diversity of wildlife. I think that it should be protected. I urge you to reconsider your designation of this stream.

Thank you for your attention. I look forward to learning of your final decisions.

Sincerely yours,

John S. Anderson

Response 19 - 1: Please refer to general response # 8 (Cienega recommended alternative).

JUN 6 8 1994

June 7, 1994

Mr. Phil Moreland Bureau of Land Management Arizona State Office 3703 North 7th Street Phoenix, Arizona 85014

Dear Mr. Moreland:

20-1

I am a Terson resident, concerned about Arizona's environment. I've recently read about the Wild and Scenic Rivers designation and it appears that the BLM has done an excellent job in Southern Arizona with the one glaring exception of Cienega Creek. Cienega Creek needs to be designated as "Scenic", or its wetland community will not be protected.

Please designate Cienega Creek as Scenic!

Thank you for all of your efforts to protect our environment.

Sincerely,

Swan Tauston

Susan Taunton 1109 E. Elm St. Tucson, AZ 85719 (602) 628-8785 Response 20 - 1: Please refer to general response #8 (Cienega recommended alternative).

3333 N. Wekster Road Tocson, AZ 85115 - 2933 June 4, 1994

000021

Mr Phil Moreland
Bureau of Land Management
Arizon State Office
3705 7. 72 Streat
Phoenix ag 85019

Re: Saving Cierge Creek

I strongly endone the disgration of Crinacy Creek under the "Mittional Wild + Senic Cine" protection.

It is imperating to incure that the resource was a former to ability of nother Earth to the read to incure the ability of nother Earth to the read to incur the ability of nother Earth to promote clean air, gues water and becoming foods for now and future Senerations. How and future Senerations the worldwide destruction of the planet by taking care of our swn backgard key the planet by taking care of our HOW. In arisonal other whose will be one day to that people will reading my hope one day to that people will reading wilderness areas are true national heaving and wilderness areas are true national heaving and

Sincerely. July Fring Response 21 - 1: Please refer to general response # 8 (Cienega recommended alternative).



Mr. Phil Moreland 000023 Bureau of land Management Arrzona State Office 3703 North 7th St. Dhoenix, A2. 85014

Haidddaniidddddallandiiddadlandii

June 1984 Dear Mr. Moreland, There is no time to love! Origonas rivers need protection now! Reparian corridors on Blm lands are vital for so many plant and animal species the we lose them, we will lose a great biodiversity with them. as a professional naturalist, it know that the best place to watch widdles in arisona is by water - a vital source of survey for them like human a need the stade, clean water, and oxygen + beauty they provide as well. Shark you, Carol Tepper YES'ON WILD -SCENIC RIVERS!

Phil Moreland Arizona State Office P.O. Box 16563 Phoenix AZ 85711

June 6, 1994

Dear Mr. Moreland,

I was unable to attend your public hearing on May 23 in Tucson and I failed to connect with you by phone that day, but I did want to express my support and appreciation for the proposed inclusion of so many Arizona rivers under the protection of the Wild and Scenic Rivers Act.

I hope you will consider adding the Clenega Creek under the "scenic" designation. It's one of the few remaining examples of a (relatively) intact clenega. I understand Clenega Creek has received top priority for protection by the Desert Fishes Council, because it is home to the largest known population of the endangered Gila topminnow in the United States. And it's a beautiful place.

Thank you for your consideration.

Katie Nash 3739 E. Guthrie Mtn. Place Tucson AZ 85718

> Response 24 - 1: Please refer to general response # 8 (Alternatives).

000025

Lean per trousand:

A am unitary or a citizen who fault

He BLAT to say that it is of the

at at most priority to present

Crenega Greek. If this means working

for Well & Scenic Designation - so be

it. Thank you

Response 25 - 1: Please refer to general response # 8 (Cienega recommended alternative).

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wilderness, I liege again to consider my
community agrading the LEIS or Statement will
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Also, when the BIM societies a third as one of
non-suitability can the reasons be stated as to
the recommendation pustification
Rivers are more than just waterways.

Inches for your efforts and work to be that
you are thereformed as outstanding ecological
fections: Respectfully, Mr. Doubly D. Ottos

Response 26 - 1: Please refer to general responses # 9 (River Study Area Protection) and 10 (Comparisons).

Response 26 - 2: Please refer to general response # 1 (Alternatives).

JUN 2 2 1994

June 21, 1994
Doug Hulmes
834 Blue Jay Drive
Prescott Az, 86303

Phillip Mooreland, Branch Chief Planning, Env., Lands and Recreation Az. State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Az. 65011

Dear Mr. Mooreland,

I am writing to express my support for the Az. River Coalition recommendations for Wild and Scenic Rivers in Arizona. I have had an opportunity to review the BLM recommendations for the EIS, and generally feel it was well done. I have specifically focussed my attention on the Hassayampa, Santa Maria, and Burro Creek sections. I am including a copy of the report I submitted to the Coalition on the Hassayampa. This report is a summary of my work with references made to previous BLM documentation. I would also like to emphasize my support for all sections of the Santa Maria, Burro Creek, and Francis Creek that fall on BLM lands. I feel that Wild and Scenic Designation is vital for the protection of riparlan ecosystems in Arizona. I request that Francis Creek be reevaluated for suitability due to the high number of threatened and endangered species and water quality of this tributary to Burro Creek. I am also requesting that the upper 21.2 miles of the Santa Maria be reevaluated for Wild and Scenic. I have hiked much of this section, and feel it definitely qualifies for designation. These ripartan comitions are critical to wildtite and migrating species of birds and other animals.

I worked successfully on the designation of Wilderness for the Hassayampa, Black Mountain/tives Peak/Arrastra, and Burro Creek Wilderness Areas. Wild and Scenic designation of streams would help to connect these areas with critical habitat higher up the watersheds.

Thank you for your consideration of my comments.

Sincerely,

Doug Hulmes

Response 27 - 1: Please refer to general response # 11 (Suitability Determinations).

Hassayampa River: Wild and Scenic River Proposal

Submitted to: Arizona Rivera Coalition Februrary, 1991

> By: Doug Hulmes Prescott College 220 Grove Ave Prescott, Az. 86301

River Name:

Hassayampa River

Mileage:

Approximately 17 miles from 1/2 mile below confluence with Cherry Creek just south of Wagoner to the mouth of the Hassayampa Box.

Counties:

Yavapal

Acres of County Land:

Unknown

Studied/Recommended:

Approximately 30 miles was studied, with 9 miles recommended as Wild from 1/2 mile below Cherry Wash to the SW. boundary of The hassayampa Wilderness and and additional 8 miles designated as Scenic downstream to

the mouth of the Hassayampa Box.

Alt. Recom.

80 miles, Beginning in the Bradshaws; 13 miles Prescott National Forest. 8 miles private. Next 17 miles same as above, with an additional mileage added to within 3 miles

of Wickenburg.

Land Ownership and Manageing Agencies:

This sections lies within the recommendation by the Arizona Wilderness Coalition, and

includes State and BLM. lands.

% of Private Land:

There are a few (3 or4) mining claims that occur along this section, it is not known if they are all patented. They represent

approximately 8% of the land.

Access Points:

There is access at the confluence with Cherry Creek south of Wagoner, and at the 5W corner of the Quait Ranch Road NW, of Wickenburg.

Supporting Rationale:

This pristine stretch of desert riparian river is largely included within the boundaries of the Hassayampa River Canyon Wilderness. It also includes approximately 2 miles of state tand that was not included in the wilderness because of the moratorium on land exchange between the state and the BLM. The designation of Wild Classification for this stretch will encourage more consistant management between State and Federal Lands, and help protect a significant stretch of a riparian ecosystem that is habitat for "10 special status wildlife species including Gilbert's Skink, spotted bat, great egret, black crowned night heron, zone-lailed hawk, gila moster, golden eagle, and the prairie falcon. Preserving this area would also protect one of the few remaining riparian habitats in western Arizona."1 p.85.

Description of River and Terrain:

The Hassayampa begins high in the Bradshaw Mountains south of Prescott at an elevation above 7,000 ft. The vegetation is a Canadian/Transition mix with some aspen and maple, with Douglas fir and white fir associations. These give way to penderosa, alder, and willow as the river quickly descends to the west and leaves the Prescott National Forest. The riparian vegetation transforms to lush stands of Fremont Cottonwood near Walnut Grove, where the river flows perminantly above ground. Large Arizona Ash can be found shading pockets of yellow columbine. Below the confluence of Cherry Creek, south of the abandoned townsite of Wagoner, the river errors a deep canyon of metamorphic rock. Aproximately 1 mile below the confluence with Cherry Creek, the river leaves state land and enters BLM land and the newly designated Hassayampa River Carryon Wilderness. Pockets of willow and occassional Freemont Cottonwood shade deep pools of water that catch 3 to 4 foot cascades of water. For the next nine miles the river flows through a relatively pristine canyon that winds through a rugged lower Sonoran desert landscape, providing a dramatic contrast between the lush ribbon of riparian vegetation and rocky slopes covered with saguaro paleverde and ocotillo. This diversity

of vegetation associations along with the availability of water support numerous special status species of plants and animals.

Detrimental Uses/Threats:

The major threats to this stretch of the Hassayampa River are mineral exploration, specifically placer gold exploration, and ORV use that has resulted in visible damage to the riparian vegetation and will continue to threaten this resource. Since most of the section that is being recommended for Wild is already designated as Wildemess, the designation of Wild and Scenic to the Hassayampa will only serve to extend the management philosophy a couple of miles on state lands that occur adjacent to the designated Wildemess. This will allow for State and Federal protection of this tragile riparian environment from being further degraded by ORVS that have been entering the carryon from mining roads that afford access at either end of the carryon.

Support/Opposition:

Designation of Wild and Scenic status for the Hassayampa has wide spread support from conservation groups including: The Arizona Rivers Coalition, the Arizona Wilderness Coalition, The Prescott Area Wilderness Coalition, the Prescott Area Wilderness Coalition, the Prescott Audubon, Sierra Club, Wilderness Society, and the Prescott Tri-Coilege Student Environmental Network. Opposition to designation would probably come from miners, ORV users, and proponents of a dam for the Hassyampa Box.

According to the BLM Upper Sonoran Draft Wildermass EIS, "Exploring and developing placer gold deposits along the Hassayamp River would leave lasting impact on the scenic canyon and pristine riparian landacape. The narrowness of much of the gorge would magnify these impacts by requiring the building of most mine support facilities on higher benches or across steep canyon walls out of flash flood zones." The report goes on to say, " portions of the river canyon will continue to be subject to ORV use, which may damage riparian habitats and disrupt wildlife." 2 p.91.

Outstandingly Remarkable Values:

Scenic:

This remote area contains over 8 miles of mone of Arizona's free-flowing ephemoral desert streams. The carryon, long recognized for its scenic quality and rugged primitive recreation value, passes through the eastern and southern portions of the unit in a spectacular gorge nearly 1,000 feet deep. Further more, the sinuous river carryon with its myriad of side carryons, thick upland chaparral vegetation, and ruggedness would continue to provide the visitor with numerous opportunities for solitude."3 p.91.

Recreation:

"Excellent recreation opportunities would continue to be offered the wilderness user including, hiking, backpacking, hunting, horseback riding, mountain climbing, photography, birdwatching, seasonal river running and plant, and animal and geologic sightseeing."4 p.91.

Geologic:

Hassayampa River Canyon is a rugged 1,000 foot deep gorge that winds through colorful metmorphic rock. Large boulders, short water cascades, and beautiful pools of water occur along the river bottom.

Fish, Wildlife, and Vegetation:

'Ten Special Status species are believed to exist in the area. These include: Gilbert's Skink, Desert Bighorn Sheep, Spotted Bar, Great Egret, Snowy Egret, Black crowned Night Heron, Zone-Tafted Hawk, Black Hawk,

Gila Monster, Golden Eagle, and Prairie Falcon. Two unusual plants; the flannelbush, which is being proposed as a BLM sensitive species, and a small group of Arizona Cypress occur in the units northern part."5 p. 43. State Usted Species include: Arizona Skink (only known population). Also, the Harris hawk, Yellow-billed Cuckoo, Willow flycatcher, Bell's vireo, Summer tanager, Yellow warbler, Belted kingfisher, Vermillion flycatcher, Yellow-breasted Chat, Common yellow throat, Southwestern Toad, Lowland leopard frog, Longfin dace, Desert tortise, and the Mexican garter snake have been reported in the area.

Ecological:

The riparian vegetation and perenial water that occurs in the Hassayampa is host to 10 special status species of animals. This is the seventh most numerous numbor of special status species identified out of seventeen areas studied for the Upper Sonoran Wilderness Inventory. It should also be noted that the area has not been carefully studied, and it is my opinion that more special status species could likely occur in the area.

Cultural:

Because of its location, and the likelyhood that the Hassayampa River has been used for migration from the highlands to the low deserts, and also considering the guaranteed water supply, the area probably has numerous unidentified cultural sites.

Recommendation:

9 Miles...Wild...from 1/2 mile south of Cherry Creek confluence with the Hassayampa to the Southwest boundary of the Wilderness.

8 Miles...Scenic...from the Southwest boundary of the Wilderness to the mouth of the Hassayampa Box.

Bibliography:

Arizona Wilderness. The Arizona Wilderness Coalition: Arizona, December, 1987. p. 87

<u>Upper Sonoran Draft Wilderness EIS</u>. United States Department of the Interior/Bureau of Land Management: Phoenix, Arizona, September 1982. pp. 43, 47, 90, 91.

Phil Monder ()
000028 BLM
BLM
W State
Physics Hz non-tont Munich Mendels Tom & Maria Mendola 2343 E. Parkway Ter Tucton, Arizona 85719 Please vote for General week to become designated as a

28.1 | "Scenic River" to crisma

the crimingo as a natural

resource of beauty and

roture!

Tom + Maria

M Indola

Response 28 - 1: Please refer to general response #8 (Cienega recommended alternative).

Phillip Moreland, Branch Chief Bureau of Land Management Arizona State Office 3707 N. 7th Street P.O. Box 16553 Phoenix, Arizona 85011

Dear Mr. Moreland.

I am writing this letter to comment on the Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement. I strongly urge you to recommend the All Suitable Alternative.

All Americans must recognize the fact that here in Arizona over 90% of the natural riparian areas in existence prior to intensive settlement have disappeared. This is due to a variety of factors, including overgrazing, intensive groundwater pumping, and the use of waterways for mining activities. We can no longer afford to allow even one area to be further damaged!

We need the All Suitable Alternative to ensure longterm legislative protection under the Wild and Scenic Rivers Act to all 20 eligible river study areas. The BLM, while doing a great job at protecting many of these areas presently, may, with a change in administration and focus, be swayed to allow development and mining in these precious areas.

Specific areas not included in the Proposed Alternative which demand protection under the Wild and Scenic Rivers Act include Turkey Creek and Cienega Creek. Impacts to the outstandingly remarkable scenic values resulting from non-designation of the Turkey Creek study area could arise from minerals development and intensive recreational activities. Without long-term legislative protection, there would be future risk to the fish and wildlife and aquatic habitats of the Cienega Creek areas.

Under the All Suitable Alternative, positive beneficial impacts would result from long-term legislative protection in all the following categories in all the river study aceas: Impacts on outstandingly remarkable scenic values, recreational values, geologic values, fish and wildlife and aquatic habitat values, cultural, historic, and paleontologic resource values, hydrologic values, and tourism. All other alternatives result in significant negative impacts in many of these categories, in many of the river study areas. Therefore, the only suitable alternative!

Sincerely,

Sarah Robert - Manulatio 867 E. Alturas St.

Sarah Roberts-Manolakis

Tucson AZ 85719

Response 31 - 1: Please refer to general response # 1 (Alternatives).

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31-1

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona Size Office, Bureau of Land Management 3707 North 7th Street P. O. Box 16563 Phoenix, Arizona 85011

Dear Mr. Moreland:

I am writing with a few comments regarding the Draft Arisona Statewide Wild and Social Rivers Legislative Environmental Impact Statement. The BLM has dome a great job overall in its study and assessment of rivers statewide. It is important for the public to understand why the various segments have been recommended for their particular designation and what exactly that particular designation and the particular designation and the particular for the public is also important for the public to understand why various segments have not been recommended for designation or have been found to be non-suitable. The public is becoming increasingly aware of the ecological significance of our desert rivers as well as the importance of protecting the entire watershed and thus should be very well informed about how our rivers and lands are meaged.

32-1

Regarding the Gila River--it seems to me that the Middle Gila along the Needles Eye Wildeness Boundary should be recommended for Wild designation.

32-2

32-3

Regarding Bouita Creek--It seems to me that the upper segment should be continued to where private land begins at Lee Trail Road.

Regarding the Virgin River-It seems to me that the Arizone portion of the Virgin River should be recommended for designation without delay since the Virgin is a highly threatened river.

Taunk you for your concern for Arizons's rivers.

_

Donathy Lea Riddle

Response 32 - 1: Please refer to general response # 1 (Alternatives).

Response 32 - 2: Please refer to general response # 11 (Suitability Determinations).

Response 32 - 3: Please refer to general response #1 (Alternatives).

Dear Mr. Moreland:

Thank you for the opportunity to comment on this extremely important issue of Arizona's river and streams.

First, I would like to thank you for the selection of a Proposed Actron Alternative which recommends 27 segments in 13 river study arets as suitable for designation, and for BLM's understanding of And commitment to both the process of assessing rivers and the values of rivers under BLM junisdiction in the state, with the qualification that we guerta some of the individual findings of non-suitabity.

I am deeply concerned About the lack of explanation of the relative protections afforbed rivers by wilderness status, national conservation status, wild and scenic river status, status as an ACEC, and any other special status conferred in a land use plan, especially in light of the fact that one of the alternatives is a legislative Protection alternative which finds suitable eligible rivers that are not planedy protected by wilderness or national conservation status.

I retso feel that the BLM has a major than in its impression that other special status protections, and ever general management under existing land use plans, can substribute for will and scance view protection.

the BCM should include with each individual recommendation of non-suitability the reason or reasons for such a recommendation.

The public needs to be clear about why BLM is recommending non-suitability in each case, or else BCM will have facility up to its responsibility under NEPA. Further nove, public interest in designation Inon designation is a facility considered in suitability.

Response 33 - 1: Please refer to general response # 9 (River Study Area Protection).

Response 33 - 2: Please refer to general response # 11 (Suitability Determinations).

464

33-2

ment found non-suit prole could cause the BLM to reverse it. self and find the segment suitable in the Final EIS. While the Gila Box Riparian Nat'l. Conservation Aven Manage I next Plan is still A draft, the BLM represents it As Find throughout the Draft LEIS. Some or All of the proposed management actions may never be implemented, departing on what is contained in the final management place, but the Draft LEIS gives the impression that they are existing or ongoing. Management actions take from the draft Plan must be identified As shaft-only when described in the Fingulation Now, some comments on individual River Study Areas. Cinega Creek - I challenge the finding of non-southbolity. Ciencer Creek is both regionally and notionally significant As A rare compartype over and for its notice fishery, is I'm sure you know, it is one of the last and best remaining Clenega-type vives in the Southwest, and it supports native fish populations without the presence of exotic fish species. Contrary to the BLM's assertions, substrantial changes in management moved occur if the creek were designated since more agencit under wild and scenic river startus would include protection and enhancement of the values that caused it to be included in the system, as mand atab by Sec. 10A of the Uils ALS SELIC RIVER Act. Norre of the fractors that usually cause a segment to be found non-suitable are fractors of significance in this case, so there are no substantial impediments to designation.

determinations, so an overwhelming show of support for A sap

Response # 8 (Cienega recommended altern Response 33 - 5: Please refer to general response # 11 (Suitability Determinations).

Response 33 - 3: In the foreword, under the section, Other Considerations, the statement is made that for the "purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation will be approved" (p. ii). In the case of the Gila Box Riparian National Conservation Area, many management actions are prescribed by P.L. 101-628 (Arizona Desert Wilderness Act).

Response 33 - 4: Please refer to general response # 8 (Cienega recommended alternative).

H7755AyampA Rive- I request re- evaluation of suitability. The pariodic proposals to build A dam in the Box Canyon in segment C which are opposed each time by local resident in the town of wicken birg and groups like the wickenburg Horseneis Assoc world be stopped paramently by wild And scenic designation. The Draft LEis gives imminingeribility due to it large mount of private land owner ship At the main reason for finding it non-suitable. Significant parentage of private land owner ship is not an automic bar to non-suitability. The BLM should explore the option of Letining A segnet that would include the Box Congon which would be managered Virgin River-I Am deeply concerned with the recommediation to design note the Virgin As A Study River rather than to designate it into the system. It is a highly threatened river system that nould be seriously jeopardised by any further delay in designation. while the BCM wants to want and designate the whole river, the Virgin cannot afford any delay. The river supplies Two lederally endingues fish species that Are in immediate domen of extinction due to habitat loss. Although protecting whole systems is important, for sure, 1+ 15 possible to designate the segments in Az. first, med Add the ones in Utoh and Nevada later. If angress is rut propared to designate the Az. segments without Also des ignating the Utah and Newsba segments, it can make that political dension on its own.

Response 33 - 6: There currently are no plans for dam construction at the Box Canyon. Any proposed dam project at Box Canyon on federal land would require completion of environmental compliance documents, with public review and comment. Also, see the river appendix volume for the impacts on dam construction from implementation of the Hassayampa River alternatives.

Response 33 - 7: Please refer to general response # 11 (Suitability Determinations).

Response 33 - 8: Please refer to general response # 11 (Suitability Determinations).

San Pedro River-I would like to see it reclassified as schic" rotter than recreational.

Despite the three road crossings and A vailroad line that parallels the river, the shoreline is still largely undeveloped. In part, this is why it was designated RNGA. The guidelines in the Act and in the BCM manual gire the BLM the Ability and flexibility to classify it as scance. Sec. 2(b) of the Act defines scance river arous as "those rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads." BCM manual Sec. 8351, 32A2 Adds, "Scenic means the river segment may emain more development (except for major dams or diversion works). Than it wild segment and less development that A recreation segment.

I feel the San Pedro would greatly benefit from A more restrictive management provided by A scence designation.

Francis Creek supports a presommently native fishery. It supports at least 8 threatened, endangered and candidate species. The town of Bagdad gets 85% of its domestic water supply from the creek, but designation would not negatively affect the water supply or facilities, in fact, it could improve water guality and for quantity.

The benefits of designating Francis Greek outweigh any possible benefits associated with alternative vses.

Response 33 - 9: Please refer to general response # 11 (Suitability Determinations).

33-11

Sports Maria River-I request re-evolution of sutability of year 212.

The upper section contains an important desert reparam earliester that is of regional significance. According to the Draft LEIS, this area could significantly contribute to the recolorization of the Colorado River by bald engles.

Bonita Creek -

I would request an extension of the up per segment to include portion from Loe Trail Road to the northern boundary of the parcel owned by the City of Safford. No reason was given as to why the upper segment was terminated at Lee Trail Road. Lower segment was found unsuitable due to the fact that private land made it universageable. It would make better sense in that case to-tontinue the upper segment down to where the private land begins. The portion from Lee Thail Road to City of Safford property boundary contains a significant riparian area with important wildlife habitat.

Section 5(d) of the wild a Scanic Rivers Act requires All federal agencies to consider potential national wild, scenic and recreational river areas in All planning for the use And development of water and related land resources.

Again, thank you for the chance to express my concerns on this critical document.

I hope you will keep these commets in mind As you finalize the Az. Will & Scale Rivers EIS.

Thank you. Sincerely, John Dampein Response 33 - 10: Please refer to general response # 11 (Suitability Determinations).

Response 33 - 11: The Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

Mr. Phil Moreland Bureau of Land Management Arizona State Office 3703 North 7th Street Phoenix, Arizona 85014

Dear Mr. Moreland:

After reading the "Saving Cienega" article in the <u>Tucson Weekly</u>, I feel a need to respond to the issue of whether to designate the Cienega Creek as a National Wild and Scenic River or allow it to remain in it's present state.

Acquiring a Wild and Scenic designation could help ensure the protection of this unique and important area. Although currently there is an environmentally favorable management, changing administrations in the future may not place the same value to preserve Cienega Creek. In addition, the Endangered Species Act and Clean Water Act, which currently protect the Clenega, will require renewal in the future.

Southeastern Arizona is being "discovered" by an increasing number of people which can only cause further pressure on this area. The Wild and Scenic designation could add strong protection against development.

In the states of Arizona and New Mexico, it has been estimated 85-90% of the riparian areas has been lost. Saving what remains has to be a priority for the preservation of various species. Cienega Creek is home to 170 species of birds, including the rare gray hawk and yellow-billed cuckoo. Three species of native Arizona fish live in the Cienega's waters. Other animals such as pronghom, whitetail and mule deer, mountain lions and coatimundi rely on this water source. These animals and the scenic beauty of this area provide humans with a place to enjoy.

Please take all possible action to protect the Clenega for future generations. Thank you for your time.

Sincerely.

Both Ellister

Beth Ellickson

Response 34 - 1: Please refer to general response # 8 (Cienega recommended alternative).

LAWYERS

June 28, 1994

Philip Moteland
Planning, Environment, Lands and Recreation
Arizona State Office, Bureau of Land Management
3707 North 7th Street
P.O. Box 16563
Phoenix, AZ 85011

Re: Comments on the April 1994 Draft Arizona Statewide Wild and Scanic Rivers Lagislative Environmental Impact Statement

Dear Mr. Moreland:

We represent Clayton Jacobson, who owns property through which the Bill Williams River runs. The Bill Williams Rivers is one of the Rivers included in the Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement (the "LEIS"). Mr. Jacobson owns most of the private land in Segment 2, hearly 600 acres. We have reviewed the Bureau of Land Management's draft LEIS dated April 1994, and offer the following comments. We find the report to be lacking in several important respects.

The draft LEIS does not adequately account for the historic and present uses of the property under consideration, and does not even acknowledge that the property may be put to far different uses in the future. Segment 2 consists primarily of domesticated and fenced private property. This land has been in its present private state for over 70 years. There are several wells with permits. Mr. Jacobson's property is posted and fenced, and the River meanders through it. Public access to the area and the River is plentiful and easy. There are three existing mirstrips in use in the area. Another 5,000 foot runway has been cleared and rough graded, and will be paved. One of the existing airstrips and the airstrip to be paved are very close to the River. There are a number of mining claims in the area as well. At least 14 buildings are located along the segments 1 and 2 of the River; a number of those are within one-quarter mile of the River. Mr. Jacobson's land itself has houses and barn-like buildings. Other land in segment 2 has been used for agricultural purposes. Because a significant percentage of segment 2 is in private hands, it cannot be considered a "wild or scanic" public land or waterway.

TWO REMAISSANCE SQUIPE + 40 % CENERAL WENCE, SUITE 2300 - PROCNIX, AREZONA ASONA (602) 271-4409 - 848 (602) 271-4300

While Mr. Jacobson has not made final plans, he has considered several options, including a 12 acre lake (not in the immediate River bed), completion of the paved 5,000 foot runway, custom homes and recreational facilities. Mr. Jacobson has commented about these plans several times in letters to the BLM regarding the designation process.

According the draft LEIS, Segment 2 would be classified as scanic. Segments 1 and 3, which fall within existing wilderness areas would be classified as wild. Designation of all threas segments is inappropriate. As the Draft LEIS and appendix point out, aughe protection for the public lands already exists. The three segments in the Bill Williams study area are already covered by management plans through the Wilderness Act, a portion of the Kingman Resource Management Plan, the Three Rivers Riparian Area of Environmental Concern, the Yuma District Resource Management Plan and the Bill Williams Riparian Management Plan. These management plans will govern use of the public lands in segments 1 - 3 regardless of action taken under the Wild and Scenic Rivers Act.

Because ample protection for the public lands already exists, and, as explained below, designation under the Wild and Scenic Rivers Act cannot affect private land, designation of segment 2 is inappropriate because segment 2 consists primarily of private land. In fact, 3.6 miles, or more than 60%, of segment 2 is private. As explained below, designation under the Rild and Scenic Rivers Act has no effect on private lands. Thus, at least two-thirds of segment 2 will be unaffected by this designation. Under these circumstances, designation serves no purpose.

We think it clear that the designation under the Wild and Scenic Rivers act cannot affect private lands. Guidelines published by the Departments of the Interior and Agriculture regarding study and management of rivers to be named as Wild and Scenic that note "[s]anagement principles may apply to private lands only to the extent required by other laws such as local zoning and air and water pollution regulations." 47 Fed. Reg. 39,454. The BLM's regulations restrict only uses of land and water administered by the BLM, and not private lands. 43 C.F.R. § 8351.2-1(a). If the BLM disagrees with this interpretation of the regulations, it should say so in the final document. Finally, the inclusion of such a significant portion of land that

Response 35 - 1: Please refer to general response # 7 (Multiple Designations).

Response 35 - 2: The draft and final documents clearly state that the Bureau of Land Management has no authority to regulate or zone private lands and would not seek authority to do so (see the discussion of property rights in the scoping section of chapter I of the Bill Williams River legislative environmental impact statement.

35-2

The LPIS states that some 80 miles of the all of the rivers included in the LPIS run through private land. However, the LPIS fails to address the effect, if any, of designation on private lands, except in the Consultation and Coordination maction, in response to questions from the public. This 80 miles constitutes a significant portion of the rivers studied. The fact that designation will have no effect on private lands should be stated earlier and more clearly. While the draft LPIS does state that designation under the Wild and Scenic Rivers Act should not affect existing uses of land, it does not acknowledge that there may be future uses of the land far different from those today.

Mr. Jacobson's plans will provide jobs and tax revenue to La Paz County, which badly needs such developments. Governmental authorities already own well over 90% of the land in La Paz County, foreclosing many opportunities for growth. Property such as Mr. Jacobson's is one of the few sources of tax revenue for La Paz County. Further restrictions on the use of the River or private land along it will be too burdensome for the residents of County. Such restrictions will reduce sconnels development opportunities in La Paz County, an area which needs to preserve and enhance every sconnels development opportunity it has.

While the BIM has pointed out that the federal government makes payments in lisu of taxes to La Paz County, it does not distinguish between the effect of economic development by private persons, which adds to the tax base, and the transfer of taxes paid to the federal government to the county government.

Clearly, the former has a more beneficial impact on the economy. This point should be addressed in the LEIS. In addition, the final LEIS should remady the failure of the draft LEIS adquately to account for any adverse effect on La Paz County as a result of designation. The report admits that designation under the Wild and Scanic Rivers act may lead to a minimal increase in tourism, but fails to analyze the effect of any restrictions on development.

Nowhere in the draft LEIS or the appendix is consideration given to the effect of the adding yet another layer to the existing layers of management of the Bill Williams River. While the LEIS and appendix state that dual status is not a problem because only the more stringent regulations are applied, there is no analysis of whether the Wild and Scenic Rivers Act provides

The state of the s

DAUGHTON HAPPENS BROUNDESON

Mr. Clayton Jacobson June 28, 1994 Page 4

more stringent regulation than does the existing regulations. This failure to analyze the effect of designation under the Wild and Scenic Rivers Act in connection with existing regulations should be remedied.

The draft LEIS notes that the federal government may attempt to acquire the private property along the Bill Williams River on a willing buyer-willing seller basis. The effects of this action should be considered, as the government's purchase of the property will take it out of private commerce. Given the substantial acreage in La Paz County already owned by the government, this action seems unwise. Furthermore, in light of the BLM's admission that designation of the Bill Williams giver as wild and scenic is unlikely to cause more than a minimal increase in tourism, purchase of the private property seems to be an unwise expenditure of scarce resources.

Thank you for considering these comments.

Since Paly yours,

Lesli dyman (top)

LKC: nrh

cc: Clay Jacobson

Writer's Direct Dial: (602) 271-7459

Response 35 - 3: Please refer to general response # 6 (Land Acquisition).

VIRL # 1 1984

June 30, 1994

Sir,

Cienega Creek should be recommended for the Wild and Scenic River System.

37-1 The Clenega Creek ecosystem is an extremely valuable riparian ecosystem, providing significant habitat for birds, endangered species and other wildlife.

Wary truly yours,

Response 37 - 1: Please refer to general response # 8 (Cienega recommended alternative).

3408 E. Pairmount

(602)321-9399

Tucson, AZ 85716

PO # 545 000038 Barabos, W. WL 81 1894 539:3 June 28, 1994 Dear BLM River Planning. marly due to a lack of threeat from protection. Rivers with other sorts

Response 38 - 1: Please refer to general response # 1 (Alternatives).

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1	of designations were often excluded from
	or resignations were grown excipled trans
:	Wild & Scenic designation. Such as exclusion seems un justitable. The
:	exclusion seems unjustitiable. The
	classification et a waterway under
:	more than one designation would offer
	better protection for the resource, Many
	over segments with mixed ownership
	patterns were excluded from wild ?
·	Walter Sant State of the
	Scene designation, this exclusion could
:	be overcome through land transfers
	and similar strategies. I don't support
********	end similar strategies. I don't support exclusions for any of the three prior
•	mentioned seasons
	Again, thoutes for a job, well
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	done. I support strong protection for all overs, listed in fine Broth struly.
	all rivers listed in the What study
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	very small total acregge from tresource
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	Their protection, will consume only a very small total acrogs from tresource extraction activities, and yet ofter protection for very vital resources and carried communities. Thank your
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June 30, 1994

Mr. Phil Moreland Chief, Branch of Planning Environment, Lands & Recreation **BLM Arizona State Office** 3707 N. 7th St. P.O. Box 16563 Phoenix, AZ 85014

Dear Mr. Moreland,

39-1

Your agency has recently come out with a first of rivers suitable for designation as "wild end scenic." You agency didn't fist Clanage Creek, an oversight which i hope that you will correct.

Genega Dreek is one of the few remaining waterways in Arizona that only contains native species. As you know, most waterways now contain expic species. In addition to the Gile topminnow, Cienega Creek is home to three other endangered species and fourteen species that are candidates for the endangured species list. It is a significant habitat for many species of birds, fish, and other wildlife.

Cianege Crack is indeed an outstandingly remarkable waterway. It deserves to be included on this list.

Sincerely,

Sue Wallece Cabin 8780 E. Piecita Bolivar Tucson, AZ 85715

Response 39 - 1: Please refer to general response # 8 (Cienega recommended alternative).

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PC BCA 16523
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Dear Mr. Moreland:

At the Tueson hearing on the suitability of Crenique Cruk for melusion in the bull and service River System and in the LEIS two basic reasons were given for reason mending the proposed 8.5 mile organish of Crenega Creek as not suitable. Them are that there are no threats to the free Housing value of the areak and that the area is currently managed as a conservation area and that the area is currently managed as a conservation area and that even without Seemie River designation protective measures will have to be taken to schequard the population of the endangered Oke topminnow.

The existence or non-existence of an immediate threat is not relevant. A uniderness river can'd be considered entitle.

Trustmarmore in the longer term. Clerring Creek is threatened by inavitable population growth in the area and rapacious human water was the same fall that has destroyed almost every other creeker riparian habitat and left Chrisic Creek as the last, bust a renegal in the Southwest.

As such it is of great significance scenically and ecologically. The LEIS does rescaping that the "order and is Prime withlift habitat" (LEIS. Appendix, vol 1. Cirrup, p. 13) Three endangeral especies are identified along with 13 species which are randical with undurgered status and 4 birds termed rare. Furthermore, the arm

Response 42 - 1: Please refer to general response #8 (Cienega recommended alternative).

is such in life not yet on the endengened list. This is wind to be the best most diverse grassland administral by the Arisana Blue. The nearly Audubon Applehin-Lihitlell Research Runch Sanchury has sighted more than 245' species of boints. Of 100 builturity - moth species in the United States 250 and in Southean Arizona. All depends on the area's water. Ciencya Creek is critical to this rich biodeversity.

In defining the Oik topminion as the only "orderencingly remarkate " value of Counage Creek, the Bett is textify an inappropriately narrow position. If Conage Creek were to be recommended for its "extremely valuable openies and other providing habit for book, his endergood species and other wildlife" as was the Fig Sandy River, scenic river designation would be appropriate. As mandated by Section Wal of the wild + Scenic Rivers Act, will and scenic state includes protection and enhancement of the values that caused the waterway to be included in the system. This would protect the ecosystem. The Endangeral Species Act is ap for Conage or small review. The Color topminion would no longer provide any protection of it entured and protection of it entured died out of Creucage Creek or became warmercas anough studiewide to be reasoned from the endangeral 1136

This unique seemic + biologically diverse chenoga waterway deserves the broadest possible protection. Clengia Creek should be included in the wild and scenic Rivers system.

Lichard General Afrill Canady and Deborah Carrady Frobert Carrady 000043

25. 8 S 1994

0000

RECEIVED July 1, 1994 BL HEAR STATE OFFICE

Ju 5194

Mr. Pnil Moreland Chief, Branch of Planning Environment, Lands & Recreation BLM Arizone State Office 3707 N. 7th St. P.O. Box 16563 Proenix, AZ 85014

9:00 A.H. PHOENIX, ARIZONA

Dear Mr. Moraland.

43-1

The Citizen's Coalition for Arizona Rivers has proposed that forty rivers in Arizona be designated as "wild and scenic". This proposal is sound and reflects the large amount of work that they have expended while studying this issue. I hope that you will agree with their finding that all of these waterways do deserve this designation.

Sincerely,

S~

Sue Wallece Cabin 8780 E. Placita Bolivar Tueson, AZ 85715

Response 43 - 1: The Citizen's Coalition for Arizona Rivers proposal was considered during the period when the Bureau of Land Management suitability assessment reports were prepared (February - September, 1993).

Sarah Palmer 2521 East 7th Street Tucson, Arizona 85716 June 17, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, Arizona 85011

Dear Mr. Moreland;

I am writing regarding the Arizona Statewide Wild and Scenic Rivers LEIS. As you are aware Arizona's watersheds are critical habitats for numerous species including many that are endangered or threatened. Over 55% of Arizona's writidity depends on our states watersheds for survival. The increase in Arizona's population coinciding with the increased popularity of outdoor recreation necessitates establishing methods to protect our critical riparian habitats.

46-1

I urge you to reexamine the non-suitability status of Ciernega Creek. This unique river provides numerous ecosystem services as well as habitat to several species of native fish. The residents of Arizona would suffer a great toos if Ciernega Creek remains unprotected. If designated, changus in the management of Ciernega Creek have the potential to occur, because Section 10(a) of the Wild and Scenic Rivers Act includes the proceeding and enhancement of the values that cause the river to be designated in the first place.

I also encourage you to re-evaluate the suitability of the Hassayampa River. This river supports one of the ratest forest types remaining in the United States - the compawood -willow forest. The risk of damning Box Canyon would be eliminated if the BLM designated a segment of the Hassayampa that includes Box Canyon.

Finally I urge you to take the initiative in designating at least the Arizona portion of the Virgin River as Wild and Scenic rather than as a study area. The Virgin River supports two federally endangered species of fish and without immediate action the habitet necessary to support these fish may be lost. Wild and Scenic designations by Utah and Nevada may shortly follow Arizona's designation.

Thank you for your time in considering these critical and essential changes in the Arizona BLM's management of our states priceless natural resources.

incerely,

Response 46 - 1: Please refer to general response # 8 (Cienega recommended alternative).

	JUL 8 5 1994
	000052
	Mr Moreland,
	wish to support the proposed wild and some designations for
···	He 27 sections of 13 arizona Rivers Especially important are thousan Nedro and Gila By
2-1	proposals. I was surprised
	Nicker Burg was not chosen to
	in arigona & lave liked and
	and fliver The infertance of
	be overstated. Topse waterways
·	must be protected.
	attention and service. Tom Richards
	Tom Richgels 4134 E. Dover ST. MESA, 85205

Response 52 - 1: Please refer to general response # 1 (Alternatives).

53-1

And Signature of the Control of the

000053

Lainie Levick 12120 E. Snyder Road Tucson, AZ 85749 749-2960 RECEIVED

Jul 6'94

July 4, 1994

Mr. Phil Moreland PHOENIX.ARIZONA
Chief, Branch of Planning, Environment, Lands and Recreation
Arizona State Office, Bureau of Land Hanagement
3707 N. 7th Street
P.O. Box 16553
Phoenix, Arizona 85011

Dear Mr. Horeland:

Thank you for the opportunity to comment on the Draft LEIS for the Rim's Statewide Mild and Scenic Rivers proposal. First I want to say that I am pleased that the BLM has recommended so many river segments for designation. Arizona rivers are extremely important to the ecology in the state, and deserve to be recognized and protected.

I am deeply disappointed that for several of the asyments found unsuitable, it was noted that existing on-going management actions or other special status was sufficient for protection. This cannot be assumed since those management policies can be changed, leaving the river with no long-lasting legislative protection.

Cisnega Creek is an example of a river that deserves and desperately needs the protection afforded by Wild and Scenic designation. It is one of the last remaining intact cienegas in the Southwest and contains several types of native fish, some of which are endangered. One of the justifications in the LEIS for non-designation is that the Creek is protected under the Endangered Species Act as critical habitat. This may be trieved by Congress and is also being heavily attacked by the so-called "Mise-use" people. If any of their attempts to weaken the Act are successful. Cienega Creek will lose most of its protection.

Cienega Creek meets all of the criteria for suitability as a Wild or Scenic River. It has numerous outstandingly remarkable values, including it's striking beauty, rich native fish population, lack of exotic fish species, and significant habitat for birds, and other wildlife. It is not only an extremely valuable riparian ecosystem to the region, it is also nationally significant as a rare clemega-type river.

In addition, none of the land ownership problems exist that would preclude effective management as a wild and scenic river. Your assumption that Clenega Creek's free flowing character is not threatened is not guaranteed in the long term. That area is growing rapidly and ground water pumping is increasing. This, along with accompanying increased land use from ranching and mining, will impact and degrade inflow to Clenega Creek. Wild and Semic River status is the only type of legislative

Response 53 - 1: Please refer to general response # 8 (Cienega recommended alternative).

Another decision that I disagree with is the designation of the San Pedro River as a recreational river. This river should have been designated a scenic river. Current development along the river banks is minimal, and classification as recreation will probably allow the kinds of development that will result in the degradation of the shoreline and the river.

I hope that your decisions regarding these two rivers were not a result of pressure from mining or ranching interests. The only negative impact from including both as Scenic rivers would be to those two industries. The beneficial impacts, on the other hand, would be the long term legislative protection of unique public land for fish and wildlife habitat. This is significant, especially since over 90% of our state's riparian areas have already disappeared. Leaving protection to "ongoing management actions" is not good enough. These places are rare and special in their beauty.

I hope the BLM will reconsider these two decisions. The health of Southern Arizons may depend on it. Thank you for your work so far in protecting these areas.

Sincerely,

Laine Levele

Lainie Levick

cc: Congressman Jim Kolbe Congressman Ed Pastor Senator Dennis DeConcini Senator John McCain Mr. Bruce Babbitt Response 53 - 2: Please refer to general response # 11 (Suitability Determinations).

Dear Mr. Moreland,

I am verying by regard to the Draft Enrimmental Emproet streamed for the Anima Wild and Science Rivers Proposal. As a concern citizen of Anima councided to preserving the natural tenings that makes our stack so beautiful and diverse, I would like to applied the efforts of the Burker of Lind Mengement in compiling the list of rivers to be protected under the Wild & Science Rivers Act the list of rivers to be protected under the Wild & Science Rivers Act the list of rivers to be protected under the Wild & Science Rivers Act the list of rivers to be protected under the Wild & Science Rivers Act the list of rivers to be protected under the Wild & Science Rivers Act the list of rest on a lack of "outstandingly remarkable velous" supporting south ling. I woulded Crenge Course recently and picked up a phosphory on the Empire Crenge Resource Conservation Area. It towards the unfinish remarkable of the area; yes, mexplicially, the Bern Lil not count recention many the "outstandingly remarkable values" on the count recention among the "outstandingly remarkable values" on the count in the ETS.

I believe Crunge Creek offers planty of reasons to support scircular I believe Crunge Creek of the "Clenges" phenomena, and friendy It is a rare removed of the "Clenges" phenomena, and friendy undespread in Arizona. Plase spring-lad streams are removedly unique undespread in Arizona. Plase spring-lad streams are removedly unique in the Sovethern desert; Crange Creek is an ownit of continued-in the Sovethern desert; Crange Creek is an ownit of power. It provide willow method habben away in the dry board lands are threatened a higher for three species of native fish the of which are threatened or embargered. Especially remarkable is the lack of exone species in the Spream - vory unusual in a stack where exotics have helped desproy smeal netwee species and codanger may more.

The BLM maintens that Cranega Geek is not threatend in any way; so Resignation would not provide any additional protection or charge in nansporent plan. It is two other Cranega Crece Seems to be receiving, when BCM management, from past depredations, the area has softened from overgrowing in the past (as his most of

Arrandos Figurian habitat), and at one point the laid was arread by a mining anymy. There is no may be predict with curtainary what fature threats may area. It seems to me the while point of the wild a Counce Rivers that is not so much to address trismy threats or crises, but rather to protect remarkable areas from potential Subme threats.

All things considered, I would suggest a designation of "scenic" for the General Creek when It's status as a General alone smooth be sufficient for sulfasiling. Adding in the reconstruct and buildings a specific of the deducte, a strong case exists for proteoning General Creek for fifter generations. I mill vigt the Blim to take such appropriate action.

Sinardy, Rhod -Randy Survy h.

Response 54 - 1: Please refer to general response #8 (Cienega recommended alternative).

	000055 Al 86 Hts
	RECEIVED BY MAY MOVE KIND!
	<u>■ 6'94</u>
	This letter is in regards to abbandraft Airona
	Statewide Wild and Scenic Rivers Legislative Environmenta
	Impact Statement
	I have based over the LEIS and on the whole
	tagree with it. I do however have one problem:
1	the classification of Cienega Creek as "nonsu table
	for dosignation". I disagree with the assignment of
	lonly one outstandingly remarkable value -fish and
	wildlife habitat - to Eignega Cock . In a brothure
	put at by the BLM, the Eignega Greek are is
	idescribed as a nature knews paradise; lash six toot
	I tall grass, the largest Emery Dal in the Vactor States,
	and of the most significant Riparian Zones in south
	east Arizona, rich historical evidence left by Native
	Americans are 5000 years ago, and not to mention
	unlimited recreational appearanties. I would think
	these qualities might paris Creek some astand-
	-ingly Remarkable Value bosides 'Fish and Wildlife Habitat"
	I visit Ciency Creek occasionally, and I have
	that you will keep it in it's near-pristing
	condition for me and my children and grandchild-en.
	Sincerely,
	Heft Hernder

Response 55 - 1: Please refer to general response #8 (Cienega recommended alternative).

RECEIVED NA MAR STATE OFFICE

in 6'94

July 4, 1994

1025 Clubhouse Dr. Prescott, AZ 86303

9:00 A.M. PHOENIX, ARIZONA

Mr. Phil Moreland, Chief Planning, Environment, Lands and Recreation Branch Arizona State Office Bureau of Land Management 3707 N. 7th St., P.O. Box 16563 Phoenix, AZ 85014

Dear Mr. Moreland,

58-1

I would like to comment on the <u>Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement</u>, dated April 1994. In particular I would like to express support for including the analyzed stretches of the Hassayampa River in the Wild and Scenic Designation.

As pointed out in the May 10, 1993 Draft Amendment to the Phoenix resource Managament Plan, the Hassayampa meets "the criteria that a river segment must be 'free flowing' and must possess at least one river-related value considered to be 'outstandingly remarkable.'" As the Draft Amendment states, "Both the Agua Fria and the Hassayampa Rivers are representatives of desert riverine ecosystems having outstanding ecological or other values." (p. 5, Draft Amendment)

This assessment of the uniqueness of the Hassayampa River is repeated in the Draft EIS for the Hassayampa River on p. 2 where it states, "The river is free-flowing and has outstandingly remarkable scenic, and fish and wildlife habitat values." These statements as well as my own experiences in the Hassayampa confirm the remarkable characteristics of the Hassayampa River. While the River has been badly damaged by ineppropriate mining and livestock grazing practices, it is still a remarkably beautiful and biologically rich area. I urge the BIM to focus on the 72% of the river that it does own and give this river the management attention it deserves. While it is true that the BLM does not have full control of the land along the Hassayampa, that does not mean that it should abdicate the responsibility to manage this truly remarkable river in accordance with the Wild and Scenic Rivers Act.

In general I support the Proposed Action Alternative, particularly the inclusion of the Agua Fria, the Big Sandy, the Bill Williams, Burro Creek and the Santa Maria Rivers. I am less familiar with the rivers of southern Arizona, but I am qlad to see the proposed action alternative including the rivers mentioned above. Now, all that is needed is to include the Hassayampa River! (NOTE--I beliave the Forest Service inappropriately excluded the Hassayampa from its eligibility study and I am presently working to get it reinstated. The upper Hassayampa is also remarkable and I believe the Forest Service was using erroneous requirements related to perennial flow when it excluded its segment of the Hassayampa.)

Thank-you for this opportunity to comment.

Sincerely,

Leslie Chiston

Leslie Glustron

Response 58 - 1: Please refer to general response # 1 (Alternatives).

RECEIVED

压 6'94

730 N. Perry Aue. Tucson, AZ 85705

Mr. Phil Moreland Bureau of Land Munegement 3703 N 7th St. Phoenix, AZ 85014

Dear Mr. Moreland;

59-1

I am writing this letter in support of including Cienega Creek in the BLM proposal for Wild and Scenic Rivers designation— under the "Scenic" category. It is an outstanding area with regard to preservation of Arizona's biological heritage, and deserves long range protection from the increasing development in the area.

John Hopkins

Response 59 - 1: Please refer to general response # 8 (Cienega recommended alternative).

000060

美国 海绵

RECEIVED
BUILDAZ STALS OFFICI

July 22, 1993

友 6 '94

BLH 3707 N. 7th Street PO Box 16563 Phoenix, AZ 85011

9:00 A.M. PHOENIX, ARIZUNA

Mr. Herman L. Kast Deputy State Director Lands and Renewable Resources

Dear Herman,

Reviewing your letter of July 9 requesting comments about the draft Amendment and Environmental Assessment of Section C of the Bill Williams River, I am strongly in favor of the classification that would best protect it from any and all development.

Most information 1 have seen says that only ten percent of the rivers and riporion areas are left in Arizona. Whatever the percentage may be I favor protecting rivers from all future mining, dams, logging, grazing ar any type of development that causes further loss of disappearing wettamas.

The line must be drawn now, too much has already been lost. I encourage you to do everything possible to keep these rivers "wild."

Respectfully,

William W. Sowie 803 W. Marshall Ave. Phoenix, AZ 85013-1732

433-9541 h

C. (Mr. Ph.) Moreland

7-5-94

RECEIVED BULY 1994

Sear Mr. moreland, to 6'94

I am writing in response to the Fratt Environmental State ARIZONAL atement for the Wild and Scenic Rivery ligislation. bus tremetate est boer such b overall I found that the BLM did a good job. I did notice that Crenega creek was ommitted from designation. according to the chart for Outstandingly Remarkable Values, From and Wildlife Habital is the only category marked. There are Two other categories that I believe should be marked. First is aquatic. Cienegas are very unique aquatic environments. They are also, fragile and hearily influenced by grazing, mining or anything else that clears the uplands around them or the area right around the water. Secondly, Recreation was not nurbed. fast time of visited the Empire- Crenega Resource Conservation area & picked up a brothere written by the

Response 61 - 1: Please refer to general response # 8 (Cienega recommended alternative).

1

BLM stating "opportunities for recreation and nature study are limited only by your capabilities and deares. Aiking, comping, horselack riding, photography, painting, lind watching, hicycling, promiching and husting are a few possibilities". Crenega creek is the home of three species of native fish with no exotic species to eat them up. The stila Fapmennow, which is federally endangered, the Hilo Chub is state threatened and federally a candidate for endangered and should be preserving their inveronment, not ignoring it. I work and find the wildlife loth beautiful and tocinoding. I would like to continue to see the animal and plant life for years to come & would like others to be able to enjoy the area. I believe crinings creek should be designated as scenic under the

wild and beanie rivers proposal.

Frule Mugins

Chemique Creek - Not Roccommended for Dosignation as a wild and Scenic River by the Bureau & Land Hanagement

I The segments to tudied are not nationally experient, there are no threats to tree stocking values or orderandingly remarkable values, and no additional protective management needed for habitat of endangered Gila top minrow "

R. "No substantial changes in management would occur if river segments were added to NWSRS"

(U.S. Department of the Interior, Bureau of Land Management, Doubt Arraina Statemate limb and Scanic Rivers Environmental Depart Studenard, p.13) (LEIS)

. Summary of views of hydrologists, biologists and comservationists consulted.

- 1. As one of the last + best along a creeks remaining in the Southwest, it is of outstanding scenic value.
- 2. As one of the last corrects in Anzona with only native. . Fish and no exchiction, it is it outstanding value.
- 8 As an essential part of a very complex and rich ecosystem justaposing a manery great with one of the most diverse remaining stands of semi-cusual grasses it is of outstanding value.
- 4. Current BLM management in Friendly to conserving the econic and ecological values of the Creek. However, other & years of junicidation are that area, etill no comprehensive management plan has been written to extend or refine, or make policies

Response 62 - 1: Please refer to general response # 8 (Cienega recommended alternative).

602 640 2252:# 3/ 6

Summary 2

more languating. Nor has the BLM deciced to designed a chinego area as an "Area of artical tensionmental amount (1000) which would offer additional protection.

5. Scanic Pirur designation would aid stocketion change management policies, and institutionalization protection for an important scenic and ecological resource of "audistandingly remarkable" value (in the works of the LEIS)

Comments from the public are welcomed until Tuly 7, 1994 Latters or fax to:

Mr. Phil Horeland
Chief Branch of Planning
Environment, Lands and Recredion.
Anzona Stude Office. BLM
3707 N 9th Stud
PO Box 16563
Phaenix AZ 85014
Fax: 602-650-0452

Cianaga Cireak
Recommended "Mot Suchable" for wild and
Scance River Designation by the Birecust hand
Management.

Cremique Creek drains much of the Santa Rita and Whatstone Mountains and eventually enters Fanting Wash. Two segments of the Creek have been sticked by the Bureau of land hunagement (BkH) in the David Anxiona Statewide Will and Scenic Rivers Legislative Environmental Impact Statement (LE15) for possil designation as a will and Scenic River. The study area acritains 8:5 miles along Croisega Creek, one mile on Hattie Cangon and one mile along Empire Gulch for a total of 10.5 miles + encompassing 5, 200 acress. Ten of those miles are our rently administered by the BL' one half mile by the State of Arizona.

The only aspect of Change Creak the BLM judger outstandingly remarkable "was its habitut for the endangered Gila topminnow, Fledispeis occidentalis occidentalis. The BLM maintains that no embolishad changes in management practices would occur if Change Creak were to be draighed a Scenic River. It feels that BLM management and any action necessary to protect the Gila topminnow will preserve the creak in the Future

Chenega Creek is one of the land and best cienced waterways in the Southwest. As such, its exercic values and cienced vagetation is advanding with riparian and cienced vagetation justaposes to a remarkably diverse stand of service desort grasses. Huge Frement adhenwoods, Compiler waters are valued as and Ansena include.

602 640 2252:* 5/ 6

callists, a rushes had the creak while stands of big sacoton and other perenned grass species struck out toward the surrounding mountains.

The biodiversity of the area is not in dispute. In adoption to its reconquision of the evidence for a creek free Gila top minnow and other nature fish in a creek free of exotic species the LEIS lists 3 other evidence of exotic species the LEIS lists 3 other evidence and It candidates for endangered species among the fish binds, mammals, teamphibians of Cienega Creek Four other binds are termed rere. Horeover, the locality abounds with life not get on the immedenal lists. This is said to be the best, the most direma grassland administered by the despite much direma Creek is one of the few Anzone waterways with only nature fish. The nearby Andubern Appleton whitell Research Ranch Sanchury has a list of more than RSO species of binds righted. The region is rich in bulkerfilm - mith species. All depend on the weeks with

Although the LEIS states that the "entire area is prime withith habitat (LEIS, Appinary Vell P. 13), the BLH is not recognising the value of Cienega Creek's arraral role in the biodiversity of the area. By not recommending the property segments of Cienega Oreak for Econic River Status, segments of Cienega Oreak for Econic River Status, the BLM is taking a passive stance. Becomes the LEIS summarry defined the Creek's "cutodiversity vernor taken "value" as only the existence of the Creek's tampe population of the sold injection of the Creek's BLM contends that the top minion will be cally untilly protected by the Endangered Species Act. The

the Cila top mirror will as extresty protect the entire Cremega exceptem. Horeover, the BLM maintains that management practices would not change substantially is Cremega Creak was designated a Scenic River.

There are problems with this pointion. The general agreement among the hydrologists biologists and conservationist consulted was that Scenie River status, although not a querantee of proservation would provide important additional protection for the hubitut.

Timb wild + Scenic status include protection + enhancement of values that caused the waterway to be included in the system, as mandated by Section 10(a) is the wild + Scenic Rivers Act : IT Crenega Creek were to be recommended for its "extremely valuable reparian ecosystem, protecting habitat for brids. Fish, endangered species and other wildles" as for instance, the Big Bandy river is to be recommended, the Scenic Privar designation could offer browser. protection for this, remnant of Arrisona's crenega.

Furthermore, the LEIS states that as a Science River "Elestraum Flew would be quantified, Arri acceptioned wealth to complete the event instrain flows to protect endstancingly remarkable values" (LEIS Appendix Vol 1, 1719) This is not being done currently by the BLH. It is widely agreed that father threat to Cleviage Creak comes from polantial drawdown Alexanical drawdown when is well and the same.

SENT BY: KINKOS

7-6-94 : 2:48P# :

602 640 2252;# 7/ 8

Enter the acquistion of the Empire / Cremina Ranch in 1955; the BLM's qual has been in management to protect occasion and ecologic values. In the initial acquisition agreement, mining activities were prohibited there is some potential for gravel extraction, but that some remote to the BLM. Grazing has continued and would continue with Scenic River designation, but the management has been conscious all two good of protecting the ecosystem. Some resurgence of young attentions and willow has been noted.

Despite autrent positive BLM: , some question why no overall management plan has been developed over the 6 years of BLM tenure. Transparis atum and budget problems have interfered to be cure, but no plan suggests a bus priority for a comprehensive plan. Again, with water rights so crucial the question has been raised as to why the BLM is only now, after 6 years, filing a water claim.

Scania River designation could modificationalizar protections that under BLM management depend on the enlightened policies of particular administrators

A Grandbourk to Science Privar designation occulists merence human use co the BLM projects a Deb moreuse from the current > 25th visitors par year (155, p92-3) The BLM does not event to encourage moreused user to science Rusers, but publicity a accompanying such status leads to more visitors. No time frame is incirate for the innovaries.

Response 62 - 2: Assumption 3, in chapter 4 of the statewide volume, identifies a 20-year life for the analysis of impacts. Thus, the 20 percent increase would occur over this period. : 7- 6-94 : 2:48PM :

ens enn 53ès:+ 8/ (

Comments from the public are welcomed until July 7, 1904

Sand letters on fax to:

Mr Phil Moreland
Chief, Brunch of Planning Environment Lander
BLM, Arisina State Office
2707 N 7th Etnech
PO Box 16563
Phoenix, AZ 85014
Fau: 602-650-0452

There is an "Arizona Highways" article on the Fempire Ranch, April, 1904 pp 5255

KOPY KAT

PAGE 01

000065

NL 87 1801

July 7, 1994

Because of the effect it would have on me personnally I vote for NO ACTION on all Wild & Scenic Rivers studies.

James L. Kennedy 1122 Thatcher Blvd. Sefford, AZ 85546 87/87/1994 11:57 4287447

KOPY KAT

PAGE 82

Ju 87 184

000066

July 7, 1994

I vote for NO ACTION all of the Wild and Scenic Rivers studies.

The effect it would have on me personnally, is why I vote NO ACTION.

Glenda Kennedy
1122 Thatcher Blvd.
Safford, AZ 85546

Mr. Phil Moreland, Chief Branch of Planning Arizona State Office Phoenix, Arizona 85014

Re: Draft - Wild and Scanic Rivers Legislative Environmental Impact Statement

Dear Mr. Moreland:

Thank you for the opportunity to respond to the Wild and Scenic Rivers Legislative Environmental Impact Statement. I will limit my response to those rivers and streams located in my area. These rivers are as

Lower San Prancisco River Gila River (Gila Box) Bonits Creek Aravaipa Creek Turkey Creek

By decision to support the No Action Alternative is based on the fact that all of the areas being designated are currently under adequate management as Milderness, RMCA, or ACEG. Further management would only bring conflicts in management practices and require additional studies to determine the implementation of the rules of management. In the interis of determining these rules, the potential for conflict in use exists.

By implementing the No Action Alternative (leaving things us they are now) as stated in the Dogment conclusions, there would be no direct adverse impacts on:

1) Outstandingly remarkable scenic values (page 109) 2) Outstandingly remarkable recreational values (page 110)

- 1) Outstandingly remarkable geologic values (page 114)
 4) Outstandingly remarkable fish and wildlife habitat and
- aquatic habitet values (page 112)
 5) Outstandingly remarkable cultural and historical values
- 6) Outstandingly remarkable hydrologic values (page 112) 7) Hinerals development (page 113)

Likewise by implementing the Proposed action Alternative the (3) outstandingly remarkable quologic values (page 110), the (4) outstandingly remarkable fish and wildlife habitat and aquatic habitat values (page 112), the (5) outsural and historical values (page 112), and the (6) hydrologic values (page 112), would receive no greater protection by this legislative action than currently exists under the No Action alternative.

In the Proposed Action Alternative, however, there would be an effect on the minerale development in Grahum and Greenles counties. Thirty two percent of our acopmy currently depends on the sineral industry. That translates to \$ 59 million annually. There are plans Response 68 - 1: Please refer to general response # 7 (Multiple Designations).

Response 68 - 2: Please refer to general response # 9 (River Study Area Protection).

Response 68 - 3: Please refer to general response # 12 (Visual Impacts).

495

68-1

currently being made to davelop two new mines in the general area of the proposed designated areas. We feel that these new mines will be affacted by the "intent" of this proposed action which says that there will be no "visual impairment" to the outstanding attributes. Obviously mining has a visual impairment acenic values. Even a mine two miles from the river will be visible from the designated corridor. We feel that the proposed action may prevent the development of these sines which will mean the lose of a least 1000 direct jobs and an additional 4000 indirect jobs and an annual payroll and taxes of \$ 98 million to our community. This could be devestating in the future as population increases and the other jobs decrease.

68-4

In addition to the above impacts, the implementation of the Proposed Action will also affect agriculture in our eres which provides 30 parcent of the Graham county annual aconemy and 8 21 million per year. Me feel that the intent of the Action will be to protect water flows so that habitat and scanic values are not decreased. The Act says that "every wild, scanic or recreational river in its free-flowing condition, or upon restoration to this condition, shall be considered eligible for inclusion." We feel that this could mean that diversion dams uperteam from the designated area may be at rick or if they are damaged by floods, could not be repaired in order to allow the river to be within the law of free-flowing. Without irrigation, agriculture as we know it today would be lost.

68-5

Agriculture would also be threatened by the Proposed Action to protect fish habitat which must also depend on water flows. The Proposed Action would seek to "eliminate exotic fish" in the rivers which would seen that native fish species would be encouraged. No one knows exactly which species are truly native and providing a habitat for such species hay require more available water than currently existe because of our current agricultural industry. By eliminating the catfiel and bess which are exotic species, the tourist fisherman to our rivers would be greatly affected by the Proposed Action.

68-6

The Proposed Action would have a significant effect on the City of Saiford's water supply. The predominate source of water comes from Bonite Creak from collection systems which have been in place for 50 years. The Proposed Action would prevent these facilities from being repaired if damaged by flooding. Lagislative action would be required to allow the city to develop a new reliable water source and could make as much as 25 years to resolve and costs millions of dollars.

In revisiting the No Antion alternative for each of the above listed ereas, it is clear that they can be properly managed under present BLM management without additional federal supense and with no impact on our economy and traditional land and water use.

Thank you for your consideration .

Charles lady

Response 68 - 4: Please refer to general response # 2 (Economic Impacts).

Response 68 - 5: The exotic fish elimination effort is an ongoing activity that would occur regardless of wild and scenic river designation.

Response 68 - 6: The recommended alternative reflects your concerns over the Safford domestic water supply in its recommendation that the wild and scenic river segment terminate at Lee Trail upstream of the city water facility.

Language and a contract of the contract of the

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, 8UM 3707 North 7th St. P. O. Jox 18563 Phoenix, AZ 85011

Dear Mr. Moreland:

Re: Comments on BLM Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

The Sum City Hiking Club is concerned about the preservation of certain Arizona river environments because we hike there, derive reneval and pleasure from the opportunities to experience natural settings, and want to protect the natural heritage of Arizona from the anticipated huge future population growth.

Positive coments on the LEIS:

- Me commend the study for pointing out the outstanding ecological significance
 of the rivers of Arizona and
- 2. The importance of protecting headwaters and tributaries.

Concerns about the LEIS:

- We trust you will give proper emphasis to Section S(d) of the Wild and Scenic Rivers Act which requires all federal agenices to consider potential national wild and scenic and recreational river areas in all planning for the use and development of water and related land resources.
- 69-1

 3. We are deply concerned about the lack of explanation of the relative protections afforded rivers by wilderness status, national conservation status, wild and scenic river status, status as an ACEC, and other special status. This is a major flaw.
 - SLM should include with each individual recommendation of non-suitability the reason for such a recommendation, or you are not living up to the resonsibility under NFPA.

Specific river comments:

The second secon

69-3

69-4

1. MASSAYAMPA RIVER: Request re-evaluation of suitability to stop proposals to build a dam in Box Camyon, strongly opposed by local resients. Private land ownership along the river is not an automatic bar finding of suitability. BLM should explore defining a segment that would include Box Canyon.

SAN PEDRO RIVER: No request it be classified as "scenic", instead of "recreational."
The shoreline is still largely undeveloped. Please refer to Section 2(b) and Section 8351,32AZ, which allow this.

3. VIRGIN RIVER: Disapprove "Study River" designation. Designate AZ's part now.
Ray Prendergast, Conservation Chair Ray Fundament

Response 69 - 1: Please refer to general response # 9 (River Study Area Protection).

Response 69 - 2: There currently are no plans for dam construction at the Box Canyon. Any proposed dam project at Box Canyon on federal land would require completion of environmental compliance documents, with public review and comment. Also, see the river appendix volume for the impacts on dam construction from implementation of the Hassayampa River alternatives.

Response 69 - 3: Please refer to general response # 11 (Suitability Determinations).

Response 69 - 4: Please refer to general response # 1 (Alternatives).

: WR. Philly Moreland
BLM, ARIZONA STATE OFFICE
Phenix AZ 85014

July 1, 1994

Dear Mr. Workland,

. I am writing to orge you and the

BLM to consider including Cienegy Creek under in the Wild and Scenic River

frojosil. First, itis home to two endangered fish species native to Arizon: the Longton Dau

and the Gile Topminin Secondly, it is an

outstanding example of how damaging cattle grazing can be to riporian areas and, when left

whome, how natural processes can be ut; lixed to restor such areas to full health. The BCM

is currently doing an outstanding job working

with local ranchers in allowing the creek to undo the damage of the last 100 years. This

must be allowed to continue. Thank you for

Du Z Allh

your time and consideration.

AZLCV

Response 70 - 1: Please refer to general response # 8 (Cienega recommended alternative).

Mr. Robert G. Kahl, MBA, CPA 6161 E. Grant Road, \$14104 Tucson, AZ B5712 (602) 886-5624

July 4, 1994

Mr. Phillip Horeland Branch Chief Bureau of Land Menagement P.O. Box 16563 Phoenix, AZ 85011

Re: Draft Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement

Dear Mr. Horeland:

I would like to encourage you to include Cienega Creek as a designated "wild and scenio" river. The BLM apparently left it out as a designated river because it does not appear to be in imminent danger.

I believe that Cienega Creek should be designated as "wild and scenic" given its unusual nature, especially here in southern Arizona. Saveral friends of mine have made positive comments about the area. I intend to go for a day hike there myself after the weather gets a little cooler.

I hope that you will consider the status of Cienega Creek in your Environmental Impact Statement.

cc: Sen. Dennis DeConcini Sen. John McCain Rep. Jim Kolbe

Response 71 - 1: Please refer to general response # 8 (Cienega recommended alternative).

Mr. Phil Moreland, Chief Branch of Planning, Environment, Lands and Recreation Arizona State Office 3707 N 7th Street P.O. Box 16563 Phoenix, AZ 85014

Dear Siz

I am a member of the Tueson Rough Riders and the Arizona State Association of 4 Wheel Drive Clubs and I attended the public hearing held in Tueson on the Wild and Scenic Rivers. I feel that we have enough wilderness area in the United States and particularly in Arizona. This Wild and scenic Rivers proposal is just another step in the making of all public lands into wilderness, and I strongly disagree. The BLM and the Forest Service are unable to afford the parks and wilderness areas we already have.

More people are moving into Arizona everyday and the need for recreational areas is increasing. Closing more of the public lands is not going to solve the needs of these people for recreational areas it, will only increase the use in the remaining smaller areas resulting in more damage from excessive use.

Only the non-handicapped, edite with lots of time will be able to see these areas. There have been recent federal laws enacted (Americans with Disabilities Act) to enforce the casy access of public areas for the handicapped. Increasing the areas that can only be accessed on foot will limit the access in these areas to only the non-handicapped. There are beavy penalties when business establishments do not conform to the ADA laws and limiting access to public lands for only the healthy seems to be in direct violation.

I urge you to take the no-action afternative on this issue and allow all Americans the chance to see these areas if they so choose.

Respectfully,

Charles R. Riggs
5330 W. Paseo del Barranco
Tucson, AZ 85745

Response 72 - 1: The Bureau of Land Management would fully comply with the Americans with Disabilities Act. Specific details of this compliance would be addressed in appropriate management plans developed for rivers selected for designation by Congress.

500

72-1

Dear Phil,

July 5, 1994

re: Wild and Scenic Rivers

I feel very good about the suitability findings the BLM has made for various Arizona rivers so these rivers may be protected by the federal Wild and Scenic Rivers Act.

73-1

However I noted one exception, Clenega Creek. I strongly urge you to include Clenega Creek to scenic designation. This would guarantee permanent protection of the values found on the creek today.

I'm sure you're aware Cianega Creek is is one of the last and best examples of a wetland community, it remains a realimety Intact cienega. Additionally Cienega Creek is home to the largest known population of Gila topminnow in the U.S., a federal endangered and state threatened fish species.

Thank you for considering this request,

Peter lanchiou

602.570.2513

626 E. 6th Street Tucson, AZ 65705

Response 73 - 1: Please refer to general response # 8 (Cienega recommended alternative).

000074

Bright and Joel Rea 2350 Tyler Street Eugene, Oregon 97405 July 4, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, Sureau of Land Management 3707 N. 7th St. P.O. Box 16563 Phoenix, Arizona

Mr. Moreland and Arizona BLM:

Rivers in Arizona truly are the lifeblood of Arizona. As riparian corridors they support large-scale flora and fauna blodiversity, while continuing to change and form the arid landscape Arizona is famous for. We are now at a point in history where we have to make some hard decisions. Either we designate and support wild and scenic rivers for the people of Arizona, or we turn away from what is legislatively, biologically and morally correct and allow modernization, development and improper land-use activities to continue degradation of the natural environment for the monetary enrichment of the minority intensive land-use industries. These natural lands have no boundaries, only designations epravled-out on maps. As public lands they must be managed for the entire public with the Interest of protecting wildness. As a civilization we are connected to nature as heasts - not

Don't think that the input of Bright and Joel Rea is insignificant. We have both been residents of Arizona and we plan on making Arizona our future permanent residence. We have both helped the Arizona Rivers Coalition in their quest for an Arizona Wild and Scenic Rivers Bill. Bright epent several months as a volunteer for the Arizona State Fish and Wildlife Department in the Bald Eagle Watch program, during which time she was on a remote section of the Tonto River helping to restors the endangered hald esgis. Joel spent a week and a half with a group from Prescott Coilege in the rugged Tonto River canyon between Gisela and Hell's Gate and he also surveyed Wright Creek, Big Sandy River and Bill Williams River for the Arizona Rivers Coalition. We have both lived on the Blue River and we have extensively hiked the Black river, the Gila River, Leonard Canyon, Oak Creek, West Fork of Oak Creek, Sycamore Creek, West Clear Creek and Net Beaver Creek. We have both witnessed and cursed the wandelization of archaeological sites and streambank degradation from cattle grazing and improper visitor use of our rivers. We are saddened by

the tramendous forces threatening our natural resources, but hopeful that a wild and scenic river bill would create a landmark opportunity for river preservation. Bright and I plan on returning to Arizona in a few years and we would like to see our rivers protected with an extensive Arizona Wild and Scenic Rivers Act.

We would like to make some comments concerning the BLM Draft Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement.

- 1. The Wild and Scenic Rivers Act section 5(d) requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources-
- 2. Procedure is to: Evaluate the eligibility of potential wild and scenic rivers, classify eligible rivers as wild, scenic or recreational and institute plans for interim protection, and most importantly assess the suitability of eligible rivers for inclusion.
- 3. In the BLM Draft Arizona Statewide Wild and Scenic Rivers LEIS one of the alternatives is for "Legislative Protaction". This is not a suitable designation for rivers not already protected by wilderness or national conservation status - There can be no substitution for wild and scenic river protection, so do not grant suitable eligible rivers with "Legislative Protection."
 - 4. For each river that the BLM recommends as "non-suitable the reasons must be given for such a recommendation. The public needs to be informed of such decisions and it is the responsibility of the BLM, under MEPA, to insure the publicity of these reasons. Also, if there were to be overwhelming public opposition to a BLM decision there should be a reverse decision in the Final RIS.
- 5. The Gila Box Riparian National Conservation Area Management plan is not final, as thoroughly stated in the Draft LEIS. Management actions taken from the draft plan must be identified as draft-only when described in the final LEIS.

We have several concerns about individual river study areas and by the time a final LEIS is submitted to the Secretary of the Interior we hope that the BLM will have seriously re-evaluated our concerns.

CIENEGA CREEK: Cienega creek is a rare cienega-type river with native fish, the last in the Southwest without the presence of exotic fishes. For this reason alone Cienega Creek should be regionally and nationally recognized with Wild and Scenic River designation. Under designation Cienega Creek would have its natural attributes protected as mandated

Response 74 - 1: Please refer to general responses # 1 (Alternatives) and # 9 (River Study Area Protection).

Response 74 - 2: The legislative environmental impact statement analyzes the environmental impacts of the implementation of reasonable alternatives formulated to respond to issues identified in public scoping. The basis, or reason, for determining a river study area suitable or not suitable was identified and discussed in the Bureau of Land Management suitability assessment made available to Congress and the public in September, 1993.

Response 74 - 3: In the foreword, under the section, Other Considerations, the statement is made that for the "purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation will be approved" (p. ii). In the case of the Gila Box Riparian National Conservation Area many management actions are prescribed by P.L. 101-628 (Arizona Desert Wilderness Act).

Response 74 - 4: Please refer to general response # 8 (Cienega recommended alternative).

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request that the BLM explore the option of defining a segment that would include the Box Canyon. VIRGIN RIVER: The BLM has proposed that the Virgin River become a Study River. Why? There is nothing more to study! Let's protect two endangered fish species and beat Utah and Nevada to the punch with Wild and Scenic River designation. SAN PROPO RIVER: We would like to see its classificaion upgraded from "recreational" to "scenic". Despite three road crossings and a parallel railroad line, the shoreline is still largely undeveloped. FRANCIS CREEK: Franis Creek supports at least eight threatened, endangered and candidate species and a predominantly native fishery. The town of Bagdad receives 85% of its domestic water supply from Francis Creek. For the last reason alone this is enough of a reason to re-consider the suitability of Francis Cart. suitability of Francis Creek. If we can't protect rivers for the make of endangered species, than protect rivers for the sake of allowing humans to have unspoiled drinking water! SANTA MARIA RIVER: Due to the importance of an important desert riparian ecosystem of regional significance, the

upper 21.2 miles should have a re-evaluation of suitability. This area can contribute to the recolonization of the Colorado

aries of the upper segment be extended to the private land, and not arbitrarily terminated at Lee Trail Road. This sec-

by Section 10(a) of the Wild and Scenic Rivers Act. Management under the act would require changes to protect and enhance the values that caused it to be included in the system.

large amount of private land ownership is not a reason for finding the Hassayampa River unsuitable. We would also

HASSAYAMPA RIVER: Please re-evaluate suitability. The

tion, from Lee Trail Road to the City of Safford, contains significant riparlan areas with important wildlife habitat.

We look forward to a successful Arizona Wild and Scenic Rivers Biil. With your help and wise decisions we can have a significant natural heritage permanently protected; one that can be enjoyed and appreciated by all Americans - Arizona

BONITA CREEK: We would like to request that the bound-

residents and visitors slike.

Thankyou,

Birth Child

Bright and Joel Rea

CC: Arizona Rivers Coalition

River by bald eagles.

Response 74 - 5: Please refer to general responses # 1 (Alternatives) and # 11 (Suitability Determinations).

Response 74 - 6: Please refer to general response # 1 (Alternatives).

Response 74 - 7: Please refer to general response # 11 (Suitability Determinations).

Response 74 - 8: Please refer to general response #1 (Alternatives).

Response 74 - 9: Please refer to general response # 11 (Suitability Determinations).

Response 74 - 10: The Bureau of Land Management suitability assessment study concluded that because of the operation of the city water system and the presence of four parcels of private land the area downstream from Lee Trail was not suitable for designation. See general response # 11 (Suitability Determinations).

Mr. Phil Moreland Arizona Stata Office 3707 Moreh 7th Street Phosnim, Arizona 65014 July 28th, 1994

000075

. . .

I am a rancher in Graham County and know firsthead what will happen to our growing Glis Valley community if this Wild and Sounds River proposal passes.

The Gila River and all other proposed rivers and creaks mantioned in the SEM Wild and Sounds River Ets are all lifetimes of a well developed and growing county. If

and Scanic River bits are all lifetimes of a well developed and growing county. If these rivers are baken by the Federal Covernment the pupple and industries who depend the water for their livilinode will be forced off the lands and laft unemployed. The chain reaction of such a move as passing this wild and Scenic River act sould be totally devestating!

For well over 100 years the Glis Valley and Grahen County has depended on it rivers. Do you think they are precious erough no be classified as Wild and Scenic? We all know here beautiful our rivers are...afterall, we're the ones who make a living off our rivers, and we're the ones who have preserved then in to this precious gates they exhibit to by you really believe we who depend on the rivers are out to destroy are sky would we do that?

I strongly support a NO ACTION ALTERNATIVE: We the users and caretakers of those rivers (and tampayers) do not feel we need any more added restrictions or paragrament quildlines placed on us, we savely do not need any more Government control, or people from back east telling us to take care of the rivers we have so well taken care of to this point;

I strongly beliave if the Federal Covernment sents to do scmething to benefit America's fivers and Waterways, they need to put their time and energy into the heavily polluted rivers they have created back east in their can back yards!

Its been said by millions of puople how besutiful the American West trainly in. Its size a Known fact that the American West has note rememble resources than back east. With these facts in mind, ask yourself who has kept the American West in the shape it is in today.....the FEDERAL COMPRESENT or the people of the West who depend on it for their west lives? May, lets be hunse; now.

The folks in the west who have so well preserved this part of the United States for over 100 years deserve a big hard; Shame on the Pederal Polks from back east for trying to take it from us!

No'ze doing just fine without socialism, Thank You!

Sincerely:

Am Jakon

Kim Lackmer

copies to: jim kolbe bruce babbitt various bim agencies bill clinton

Manager Same Same of Street, Advanced Same of Street, Street,

Response 75 - 1: Please refer to general response # 1 (Alternatives).

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JUL 97 1984

000076

Mr. Phil Moreland, Chief Arizona Stato Office 3707 North 7th Street Phoenia, Arizona 85014 July 28th, 1994

Bear Mr. Maneland

In regards to Wild and Senic Blyers Legislative Environmental Impact Statement, I am writing my comments to stores that NO MCTION be taken. There are simply no other sitementies that are screptable.

Time and time again the Federal Government has tried to choke the American Meat by sairing her waters. The American Meat relies on her water supply to live. The ranching, faming, mining and recreational industries all depend on the rivers we (these industries) have so well proscreed for over 100 years.

Secretary Bebbitt, the RIM and other Pederal Government agencies need to stop and look at the Gila Hiver, Lower San Francisco, Gila Box, Bonitz Creak and Aravaipa creak and see how well they have been taken cars of by the people who depend on them for their livilinoods and enjoyment and sek yourselves a very important question....

DO NE DADE REMOVE THISE CARETAKING MEDI OUR AMERICAN WEST SIVEREY

This this as an example: When I was growing up in the Microdyka area we utilized the Armwaipe Creak tributaries for ranching that benefited both livestock and wildlife in many ways, We hank emjoyment in the Arawaipe Creak itself because of its beauty. We (the ranchers) loved this area and took care of it. We becoved uply and domains debris after the floods, we planted beautiful beause along the backs in order to greate cattle and bring the wildlife in that we all so much enjoyed seeing. All the hemes along the Arawaipa Capek were well attended and cared for. It was induced a beautiful place for ALL people to see. Then, the Defances Of Wildlife and Matures Conservancy took over. At the Adulaction of the Arawaipa Caper it was set that THE ARAWAIPA CANON WAS ONE OF THE LAST REMAINING TRIBLY REISTIME ARRAY IN SUFFRANCES.

THE RANKEES who loved and depended on it for their livilihoods. I ask you now, take time to view the Arrayaipa Caper with last and the time to view the Arrayaipa Caper with Miderness area and see for yourselver when the head time to view the Arrayaipa Caper whiledeness area and see for yourselver when the become. It makes the ranching community SICT to see what the environmentalist have done to our once beautiful creak. So very often we have people say that it isn't what it used to be. Its a pitiful wheet muss! No longer can ALL people style (it) those healthy enough to "hike" in. That leaves a lot of would-be visitors cut! What a absent

76-1

Please, leave us all alone; Loave our rivers as they are; Sonp trying to take total control of our American Heat; Sonp trying to take our lives and livilands away! This is American country government BY THE PROPER FOR THE PROPER. If we the American people wanted to live in GO/20002T CONTROLLED lands we would nove to Russial.

THE THUS CARTIFICATE, THOSE OF US WID DEPRING TO ALL MADE MILE THE TAKEN ITS TAKEN FROM MANATA CHANCH MILLISTRESS AND AND SEE WID THAPPENS TO ALL MEEL MEEN ITS TAKEN FROM LEME CUR REVISES AND MICHIGANS ALONG! I CHALLENCE YOU ALL TO TAKE A TRIP TO THE LEME CUR REVISES AND MICHIGANS ALONG! I CHALLENCE YOU ALL TO TAKE A TRIP TO THE

> SURBIU SPRINGS RANCH Statute State State 4

Response 76 - 1: Please refer to general response # 1 (Alternatives).

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AUL 9 7 1984

Frank & Keske 582 W 200 North NBU9 12ma ay 85543 7 July 94

Phil Moreland, Chiff, French of Planning Environment, Sands and Recreation, Box M. Angona State Office 3707 M. Tith St. Po. Box 16563, Phoenix, ag 85014

Mr. Phil moreland;

There are people who can see nothing wrong with paining over some of the best, productive land in theyong for the Phoenicy metro area or the present createst think that it is terrible to let the list and its tributaries be used for productive human activities. Trining for copper is terrible but give us electrical and electronic appliances that is good. choice. I believe that the wild and

sease rivers designation would be a mestake because of its questionable walve to the majority of the people of our state. I do believe that the hand should be used productudes but with care so that it will be productive for fature generations. Frank & Kake

Response 77 - 1: Please refer to general response # 1 (Alternatives).

ANT 9 7 1991

HEAROLD ELMER

you was 8th Street

Thatcher, Arizona 5552

16021 428-0828

July 07, 1994

Mr. Phil Moreland The Bureau of Land Management Arizons State Office 3707 North 7th Street P. O. Box 16563 Phoenix, Arizona 85014

Gentlemen:

The intropes of this letter is in to very a reflection of my lack of concerns about our Gile River, Bonits Creek and Aravatja Creek. The local people have seanged these vesterverys for many years and have plains for them in our future growth pattern. Any restriction to their use as they are now being utilized would be detrimental to our growth and expension.

I have used these areas for recreation for many years, and any restriction put on travel would effect my method of patting around. I can no longer ride horses, or walk any distance. The only method I have to get in and out of these flabling and plemic cross is a send rail. Our utilization of these areas bean't harmed (head in anyway, I as 100% discabled and the only method for me and my grandchildren have for transportation in and out of these areas is a send reil.

Fundreds of themsands of tax dollars have been spent on office buildings to accommodate the less fortunate of us. So why try to fix something where nothing is wroted.

I recommend that the status quo he maintained the way we have it now.

Sincerely.

Warde Elney

CC: Graham County Supervisors. Safford Chamber of Commerce. Response 89 - 1: Please refer to general comment # 1 (Alternatives).

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80-1

P.O. BOX 16567 Phornix, ANIZONA 85011

6 THUY , 1984

000085 28 980000

DEAN MR. MCRELUND;

I am whiting you in Azyanda to the DARFT ARIZONA

STATEWIDE WILD AND REAL RIVER LEGISLATIVE ENVIRONMENTAL EMPORT

I AM QUITE PLEASE O WITH THE STATEMENT OVERULL, HOWERER I'M TORDLY SUPPLIED THAT CLEMPA CROCK WAS OMBILITED AS A "FROMSE of ALTERNITY OF MAINTY DECOSE THE MENER LENGTH OF A STATE WAS CIFMAN CARRY MOS NOT A "FROMSE OF HARRITICE" THIS AREA FOR OF THE MOST EVITEBLE INTHE GOVERN. BEGING WICH CLORED ARE VIKILLY NOW-EXISTANT IN THE GOVERN WEST THE BIOGOGICA-REPER COSTONA FOR LOOSING THIS AREA WOULD BE & MOURIMOUS TO THE STITLE.

AS OF IT A GENERATION ARIZONA MUTINE. I MORE THAT THEOREM WILL BE FRANKED TO SHOW MY INVIDED THE CHURCHERRON, ASSUMBLE TO DO THIS WALL BY ACCORDING TOMY CHOCK OF STREET THE CHURCHER BY TO ENCHORE THE CHURCHER BY TO ENCHOR

States

Response 85 - 1: Please refer to general response #8 (Cienega recommended alternative).

Hal Militaris
2239 E. And St. 22
Tucson, AZ 85719 (Pr. 9)
000088 /393

Mr. Phil Moreland Bureau of Land Management Arizona State Office 3703 N. 7th St. Phoenix, AZ 85014

Notabilismallatelifallmilloottellmallatell

July 6, 1994

Dear Sir. Horeland:

70 01 184

Please include these comments as part of the public comments on the draft EIS on Wild Δ Scenic Rivers in AZ.

I strongly support recommending to Congress that you designate as Wild G Scenic Rivers in Arizona those rivers recommended by the Arizona Rivers Coalition and American Rivers, INCLUDING CIENCA CREEX.

Ciença Creek is a top priority area and is especially important to us in Tucson. It should certainly be designated as "Scenic".

Thank you.

Sincerely,

Halkillams

The State of the Sta

2249 E. 2nd St., Tucson, AZ 85719

Response 88 - 1: Please refer to general response # 8 (Cienega recommended alternative).

85-1

Mr. Phil Moreland Chief, Breach of Planning Environment, Lands and Recreation Bureau of Land Management

Dear Sir

89-1

I am writing to comments on the BLM's pleasing process for recommending Wild and Scenic Rivers designations in the state of Arizana. I urge you to seriously consider including Connega Creek in your recommendations.

Circusgo Creek is an extractely valuable riperian econymism and deserves additional protection. This significant behint is rare and ouncombingly remarkable and should be preserved for posterity and exicustific andly. This is one of the few occupatoms in the state that is relatively free of exprise species.

I command the BLM on its capable and remainer unnegament of Clanege Creak within the community of its current classification. Please recumented the chaigmation of Wild and Scenic that Ciracege Creek deserves. Thank You.

Sincerely

De Black

Response 89 - 1: Please refer to general response #8 (Cienega recommended alternative).

TO: PHIL MODERNO

BUREAU OF LAND MINAGEMENT, ARIZOM OFFICE

1703 N 7TH ST

PHOEN:X, AZ 85014

DEAR MR MORALAND:

I AM WRITING TO ASK THAT YOU DESIGNATE CIENEGA CLEEK, IN SOUTHEASTERN ARIZANA, A "WILD" OR "SCENIC" AWEN. WIPER THE CONGRESSIONAL ACT OF 1968, THERE ARE A NUMBER OF REASONS WHY.

FIRST, CIENERA CARRIC IS ONE OF THE VERY LAST

SURVIVING "CIENEGAS" IN THE DESERT SOUTHWEST, IT IS A

WATURAL DASIS IN AN ARID CLIMATER, AND IT HAS MUCH

TO TEACH US AND FUTURE GRIERATIONS ABOUT WATER CONSERV
ATION AND DESERT HOSITATS, MOST PROPER, EVEN IN DESCRIPTION,

WOULD PROBABLY BE QUITE SURPRISED TO FIND A LUSH SWAMP

IN THIS SART OF THE WORLD, ON THIS RACT ALONE, IT IS

A NATIONAL TREASURE.

THE RIVER IS ALSO THE HOME OF THE ENGANGERED GILA TO PMINION. WE NEED TO PRIVIDE THIS STECKES WITH A SECURE HARMAT THAT CAN BE A STARTING POINT FOR CUTURE RECOVERY; MANY FISH FREIES , N ALIZONA HAVE ALLEADY COME THE WAY OF THE BANTISAURUS, MASTROOM, AND B-TRACK TAPES BLODIFERSITY IS CONTICHE TO A HEALTHY ECCITISE FOR ESPECIALLY IN ANIZONA, AND CHEMEON CREEK IS NO EXCEPTION.

BY CATTLE RANGHING. HOWEVEL, THE SECTIONS THAT WE HAVE SEEN RECOVER PROJECT AN EXAMPLE OF RIPARIAN RESILIENCY. REMOVING COMI AND FRICES IS ONE THING, THOSOM, AND REMOVING CLE COURSES AND CONDOMINIUMS ANOTHER. IF CIENCES CREEK IS USET OPEN FOR COMMERCIAL OR THING.

DEVELOPMENT, IT WOULD HAVE A DEVALUATING EXPECT OR THE WATER EVERLY. THE STRINGS THAT FREE THIS OASIS WOULD FRAMELY NOT LONG SURVIVE BUY EXTENSIVE DISCOPTION CAUSED BY HUMAN ENGINEERING.

CHERCA CREK REQUIRES FROMAL PROTECTION NOW.

FROM FROM BEING "UNIVERSE" FOR INCLUSION ON THE LIST, THE RIVER IS IN FACT A VITAL NATURAL BISET. THAT DESERVES RECOGNITION FOR ITS UNIQUE QUALITIES, ITS SPECIES (ALL THE FICH ARE NATIVE), AND ITS ECOLOGICAL HISTORY.

SINCELELY,

THOMAS A. ZEILMAN
712 E. CAULA MALIFOTA
TOCSON, AZ 85718

Response 90 - 1: Please refer to general response # 8 (Cienega recommended alternative).

92-1



TUT 8 \$ 1980

000092

6601 West Cortez Glendale A2 85304

July 6, 1994

Phillip Moreland, Branch Chief Plng, Env. Lands and Recr. USBLM, Arizona Office PO Box 16563 Phoenix, AZ 85011

Dear Mr. Moreland:

I am familiar with many of the streams that the BLM has proposed as suitable for the national Wild and Scenic River system. I hike and camp on many of these rivers. I value the scenic beauty and wildlife that they possess.

In general I support the designation of the 13 streams listed in the proposed action alternative.

I would like to mention the importance of recommending the streams in the Gila Box, including the Gila River, San Francisco, and Bonita Creek. These streams have very important natural values that will benefit from the protection offered by designation as Wild and Scenic.

Three other streams that are very valuable additions are the Aqua Fris River, Santa Maria River, and the Hassayampa River. These streams are located in a part of the state that needs protection of the free-flowing character of the remaining streams.

I appractate the work that your agency has put forth in preparing the DBIS that will protect many of Arizona's best remaining streams. Thank you for the opportunity to comment.

Sinceraly,

Response 92 - 1: Please refer to general response # 1 (Alternatives).

Phillip Mobeland, Brench Chief Planning, Environment, Lands and Recreation (931) Arizona State Office Bureau of Land Management 3707 North 7th Street

PR 1881

3707 North 7th Street P.B. Box 16563 Phoenix, Arizona 85011

Dear Mr. Moreland,

Thank you for the opportunity of attending the public hearing in St. George. Utah on the draft of the Arizona Statewide Wild and Scenic River Legislature Environmental Impact Statement.

As a United States citizen and Utah resident for 50 years, as 2t. George resident for 7 years, and as a father and grandfather I would like to comment on the draft.

The draft impresses me as a well done river inventory of the 20 eligible river study areas.

93-1

After reviewing the 20 FIS recommendations, my personal recommendation would be to adopt the "All Suitable Alternative".

But the "Proposed Action Alternative" would certainly be acceptable.

In regard to the study areas I am somewhat familiar with, I would add further comment.

The Paria River area would seem to be such a "natural" choice for an "eligible river", both in Arizona and in Utah, that there should be little disagreement with such a designation.

As to the Virgin River area, I would push hard for the "All Suitable" designation. Ropefully my recommendation will help counteract the Washington County Water Conservancy District's "coalition" that dominated the remarks at the St. George hearing. How could anyone who has every driven from St. George to Mesquite, Nevada in the daylight argue that this river area does not have outstandingly remarkable scenic values, as well as recreational, and fish and wildlife values? Or, how could anyone with good conscience challenge the river as not being "free-flowing" because of some miner adjustments due to the freeway construction?

I do hope that I will still be around to appreciate the actual river designations. If not, my posterity surely will be.

Thanks again for the BLH's efforts and for the opportunity for me to comment.

Respectfully,

G. Scott Hansen

Response 93 - 1: Please refer to general response #1 (Alternatives).

2821 E. Linden St. Tucson, Arizona 85716

JUL 9 1 1984

Phillip Moreland, Branch Chief Planning Environment, Lands and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th St. PO. 80x 16563 Phoenix, Arizona 85011

000094

July 4, 1994

Dear Mr. Moreland,

This is in regards to the Draft Arizona Statewide wild and Scenic Rivers Legislotive Environmental Impact Statement.

Generally I find that I support the decisions by the BLM on river segments considered switable for protection. However I disagree with the decision to omit Cienega Creek. It appears that the criteria for designation, will escence and recreational values were not examined seriously enough. The Cienega Creek area has provided my family and I with experiences such as birding and other notitival history studies, exploring, and artistic inspiration. It is also a place to just relaw, unencumbered by mining or commercial development, or even national park type "improvements" paved roads, camping facilities, etc).

On a more technical level it scens that the BCM has chosen not to include it due to the fact that "there are [currently] no threats to free-flowing volves or outstandingly remarkable values." As I understand it the presence of threats is not required for a river to be suitable for designation. And there are no factors of significance that counter Ciencola Creck's suitability such as "a large percentage of private land or incompatible uses that would make management, difficult, or significant cost of acquiring lands, interest in lands, and administering the area and others."

The ravitor of this type of habitat, a perennial stream/wetland, in our state, with its attendant biodiversity is enough of a reason by itself to include Cienega Creek in the designation. To me it has both state and national significance—especially when the endangered Gila topminnow is taken into consideration.

therefore I strongly recommend that the BLM change their designations of that Cienega Creek is listed as switched on the final Legislative

Sincerely Baisan April L. Baisan Response 94 - 1: Please refer to general response # 8 (Cienega recommended alternative).

94-1

Kristine Wilson 2239 East El Moro Mesa, AZ 85204

July 5, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizona State Office, Bureau of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, AZ 85001

Dear Mr. Moreland:

SUBJECT: Designation of Cienega Creek as Wild and Scenic.

95-1 I request reconsideration of the BLM's finding of non-suitability of Cienega Creek. It is regionally and nationally significant as a rare cienega-type river. It is one of the few remaining in the southwest and supports native fish populations without the presence of excite fish species.

Section 5(d) of the Wild And Scenic Rivers Act requires federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. The procedure is to evaluate the eligibility of potential wild and scenic rivers, tentatively classify eligible rivers as wild, scenic or recreational, institute management measures to ensure interim protection and to assess the suitability of eligible rivers for inclusion.

None of the factors that usually cause a segment to be found non-suitable are factors of significance in this case, therefore Clenega Creek should be protected under the Wild and Scenic Rivers Act. Management of Clenega Creek under wild and scenic status would include protection and enhancement of the values that caused it to be included in the system and as mandated by Section 10(a) of the Wild and Scenic Rivers Act.

Sincerely

· Kristine Wilson

Kristine Wilson

Response 95 - 1: Please refer to general response #8 (Cienega recommended alternative).

John Kevin P. O. Box 2187 Apache Junetion, AZ, 85217-2197 (602)982-1737 7/7/94

Mr. Phillip Moreland, Branch Chief Planning, Ernforment, Lands and Rechaelton (831) Artzons State Office, Bureau of Land Management 3707 North 7th Stree P. O. Sox 18583 Phoenix, AZ, 89011

Mr. Moreland:

Enclosed our my comments regarding the Draft Arizona Wild and Scenic Rivers Legislative Environmental impact Statements. I am requesting my comments be included in the final environmental etalement.

I would also like to thank the Bureau of Land Management for submitting copies of the Draft Arizona Wild and Scenic Rivers Legislative Environmental Impact Statements for my review.

Comments in General

- 1. Limited or no explaination regarding the definitions of terms such as, already wilderness, national conservation area, national conservation status. ACEC and their relationship to Wild, Scenic and Recreational Designations? Where does not designation offer more protection than the other? What are the different management guidalines, operations, and plans for each of these designations in pemparison to Wild, Scenic and Recreational Designations?
- 2. Mow does general management (in existing and future land management plans) and legislative protection, protect a proposed segement and substitute for Wild, Scenic and Recreational Designation. If general management plans can offer more protection than Wild, Scenic and Recreational Oesignation, what about there general management plans, can they offer continuity?
 - 5. Pindings of unmanageability due to portions of a proposed segment being located on private land, another federal land manager or Arizona State Trust Lands (which those folia consider or are treated as private land), this should not be a reason for exclusion from Wild, Scenic and Recreational Designations. With great vigor, the BLM

Response 96 - 1: Please refer to general responses # 9 (River Study Area Protection) and # 7 (Multiple Designations).

Response % - 2: Please refer to general response # 10 (Comparisons).

Response 96 - 3: Please refer to general responses # 3 (Eligibility Determinations) and # 11 (Suitability Determinations).

Mr.	Moreland			
Re:	Comments.	Dreft	LEIS	A

rizone Wild and Scanic Rivers.

Page 2 of 12

crows about existing cooperation agreements and land management plans where there is more than one land manager, and or the land manager is another federal land manager, and or the land manager is the state of Arizona, or a private land owner. Why care't the BLM continue this cooperation when it comes to proposed Wild, Scenic and Recreational Designation ?

4. It is my understanding as of this date (7/7/94) The Gila Box Rigarian National Conservation Area Management Plan is still a proposal and a draft proposal at that, though the Oraft SLM LEIS Anzona Wild and Scenic Rivers refers and or infers this plan is final, therefore your conclusions regarding your findings of suitatfility as to Wild. Scenic and Recreational Designation, needs to be evaluated.

96-5

Further explanation as to why segments were found to be unsultable for Wild, Scenic and Recreational Designation.

96-6

8. Table of Contents, where one can readily look up a proposed segament. Likewise a glossary. If and when you do the final or a similar document, target your audiance not all of us work for the BLM.

516

Specific Comments on Individual Proposed Segements.

I support the Proposed Action.

96-7

7. Aqua Fria River: 8. Aravalpa Creek

I support the Proposed Action, but smanded to the recommendations of the Arizona Rivers Coalition which also Includes Turkey Creek. See Appendix A

9. Big Sendy River

I support the All Suitable Alternative.

10. Bill Williams Filver

I support the Proposed Action.

11. Bonita Creek

I support the All Suitable Alternative.

12. Burro Creek

I support the All Suitable Alternative.

96-8

13. Clenega Creek

I valiamently disagree with the findings by the BLM and the recommended proposed action, I cannot understand now the BLM staff that worked on this believe that existing iand management policies would offer the best protection for Clenege Creek. And as for non-sultability, Clenege Creek is one of the beat if not last examples of a cienega. marsh communities, it is also the only segment in the long Response 96 - 4: In the foreword, under the section. Other Considerations, the statement is made that for the "purposes of analysis an assumption also was made that by the time any alternative in this document is implemented, all plans mentioned in this document that are now in preparation will be approved" (p. ii). In the case of the Gila Box Riparian National Conservation Area many management actions are prescribed by P.L. 101-628 (Arizona Desert Wilderness Act).

Response 96 - 5: Please refer to general response # 11 (Suitability Determinations).

Response 96 - 6: The final document contains a table of contents for the river appendix.

Response 96 - 7: This alternative suggestion was not given to the Bureau of Land Management for consideration in the suitability assessments or the draft legislative environmental impact statement. The publication in which it appears was not available to Bureau of Land Management personnel during the preparation of the environmental impact statement. Please see general response # 3 (Eligibility Determinations).

Response 96 - 8: Please refer to general response # 8 (Cienega recommended alternative).

		01-08-04 10:40x2 830% 0900	: 22:33	y -
	:	Mr. Moreland Re: Commente, Draft LEK	3 Arizona Wild and Scenic Rivera	Page 3 of 12
			dead Sama Cruz River Basin, at one river of life in the Southweet. It could will and Scenic Rivers Act was cret Creek in mind, it deserves our long appropriate management as defined Scenic Rivers Act. I strongly encours reevaluate their findings for propose suitability, and in its place recommet designation.	very sery be said. The inted with Clanega averdue and by the Wild and go the SLM to d action of non-
		14. Francia Çreek	According to the BLM Draft LEIS, No noted in the all suitable alternative, I Sukable Alternative.	
	96-9	16.Gila Sox. Gila River	I support the Proposed Action but an recommendations of the Arizona Riv See Appendix B.	
		16. Hassayempa River	I support the All Suitable Alternative	
517	96-10	17.Hot Springe Cenyon	Please review item three in this repo Suitable Alternative, but amended to recommendations of the Arizons Rh Bass Canyon-Hot Springs Canyon, Swamp Springs. See Appendix C.	the vers Contion reparding
		18. Gila Box: Lower San i	Francisco River	
			I support the All Suitable Alternative	
		19. Middle Gile	I support the All Suitable Alternative	
		20. Parla River	I support the Proposed Action.	
		21.San Pedro	I support the All Suitable Alternative designated Science.	but amended to be
	•	22 Santa Meria	I support the Proposed Action.	-
		23.Swamp Srings	See than 17.	
		24. Turkey Creek	See Item 8.	

Response % - 9: See response 96 - 3, above.

Response 96 - 10: See response 96 - 7, above.

07-08-94 18:40xM FROM 0800 #2253 Mr. Moreland Re. Commants, Draft LEIS Artzona Wild and Scenic Rivers Page 4 of 12 96-11 25. Yirgin River I support the All Suitable Altarmative but amended to the recommendations of the Arizona Rivers Coalition. See Appendix D. 26. Wright Creek I support the All Suitable Alternative. Respectfully submitted; John Kevin CC: Senator Dennia DeConcini 518 Senator John McCain
Senator John McCain
Representive Sam Coppersmith
Representive Karan English Representative Jim Kolbe Representative Jon Kyl Representative Ed Pastor Representative Bob Stump

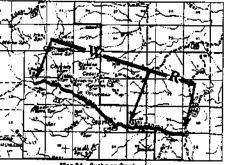
Response 96 - 11: See response 96 - 7, above.

Boolegis: Another noteworthy feature of Butheren Carryon is the lineatone fermerisms and myn, rately found along a Sopotop Dears treat. Limenary typically is found further much and one of the Carolina, Comprovide amountal habitous for but colonies and in is likely that these earcy have maremly colonies of Sections's long-neural trans, a factor a' and man band makegood quade booms

OTHER CONSIDERATIONS

One of the Interesting aspects of Bushman Creck is its "upposched" character despite being to close to Tuesco. This is a coresqueens of difficult access. One cannot travel the jeep and leading to the caryon without a fear-wheel drive which: Pearlie mining explo-ration could put new reads into this arm which could lead to explain-

tion and destruction of a valuable southern Arizona riperion area. The lower partions of Bushman Creek are desumed by a parand open-pit copper mine with militait; said herp laudites on slopes above the empty bortom. Although the mining actor? would occur raters than 1/4 calls may, it is nevertained in the st drainage and could decreey this réparters habiter from the damping overbursion less the causes bottom and the introduction of to charmingly and the economics. It is well documented that create dos



means of mining development are often devoid of squarie life. The exploratory work alone, completed in 1990, crossed domain of road over on the own three observables Rudfigure Cross of the own three observables.

APPENDIX A Re: Comments Draft LEIS Artzona Wild and Scenic Rivers

Aravaipa and Turkey Creek

This it one of the most popular destinations for recreationiets from Arizona's two largest cities, being only 60 miles from Tucton and 90 miles from Phoenia. Aravaipa Carryon has spectrocular scenery with 1000 feet clift cou-sing over the gentle torsen, but reparten organism and companying birds and wildlife.

ARC RECOMMENDATIONS

Parkey Creat, Made Clade Groups Coupons to Appendixon Reserved Arterija Comi Monga Japoniya Guyun Milianasa Will

Managing Agency: Burner of Land Management

SHOOLIK Turkey Creek flows through a small canyon with large cross session. I unkey view, more through a trial carryed with sing residence and other operatin segeration before sharing Accessing Crisis. The somety in Arreston Coopers is what cause so many people to the acus. This compose cause is arrestoneded by eightenaity ranged country, and flow these visitors on the arrest and eight supprised by the least beauty of Arreston and Turkey Crisis after the deliver in through the ornic denotes the contract of the country of Arreston and Turkey Crisis after the deliver in through the ornic denotes the contract of the country aplands surrounding the crucks.

Bourrotties: So many people ware a bliss America Caryon that a

permit system has been enablished of limit autribute in order to pro-teat the fragic ecosystem. Bird waterling is popular, and most people coming to the curyou beyon to you'd observe highers theory on the silfs. Turkey Creac is popular for burning and day viales as it is access

03-03-34 | 10.40AM 380M 03CO 02259

First and Whillie: Activities Creek is home to seven rative facing the most in any creek in Arisons. Species jurkedy loads murners, spakedson, munduid chub, longfin data, Sonosun sucher, speckind date and dater trousanin nather. The riperior system size supports gashards, willow flyenther, peregrica falcor, lowland leopard frog, ospecy, western mantiff but usel yellow belief eucleon.

Turkey Comis also supports a beneated withlife with the configures are and lower much of Turkey Creek assemblying to the hazing of the sever narive false recessioned above. There is a neeting pair of coremen black heads along the crock, a sum candidate species. Astrolog and Turkey Crede are important area for wildlife studios and secured.



Map 25 - Aravaipa and Turkey Creek

APPENDIX A. cont. Mr. Moreland Re: Comments Draft LEIS Arizona Wild and Scenic Rivers Page 5 of 12

63 ~ San Perma River Bastn

64 ~ Bar Papes Rares Matte

The Gila (pronounced Heatla) River priginates in the mountaint of New Mexico and enters Arizons near Doncan. As it traverses control Arisona, the Gila links with the Sale River near Phoenia and eventually merges with the Colorado River north of Yuma. The arid nature of this region combined with intention agricultural diversions of both ground and surface unter have combined to reduce the Gile to a dry wesh in virtually all of its lower dust segments. The Gile Box segment of the upper Gile river remains in a free-flowing and near natural condition, on exception on a river which has been dramatically alresed by the presence of man. The riparian growth found along the river is of significant value. Of the 400 miles of Gila River in Arizona, only the upper 40 miles remain free flowing and unaffected by dame.

The Gila Bax regreens is located sombwerr of Clifton, Areana and includes 26 miles of the upper Gila River, 15 miles of Bonise Creek and 8 miles of the San Francisco River above in confluence with the Gile. This segment her been need by the Bureau of Land Managemens (BLM) as being the "and free-flowing sweath of the Gile River in Arisana". Congress has directly designated parts of the Gile Box as a National Riperian Conservation Area. The Gile Bax 179ment has been identified as eligible for study as a posential wild senie or recreational river in the 1982 National Rivers Inventory conducted by the National Park Service.

ARC RECOMMENDATIONS

36 miles of the Clie River from public lead boundary downstants of US 666 to Spring Creek. 15 miles of Bonins Creek and 8 miles of the San Francisco River from public land beauting 2.5 miles much of Clifton to configures well the Gile River to Edition

Public look beauting below \$5 464 to west beauting of Available 24 private hour Service

Bartim 25 has to Demissa Campa: Will

Describe Labour to Opring Compant Science

the Property Street - 2.8 miles worth at Ciffee in south househop of Enables 14 private labels flaresteens.

Am Primeiras New - Martin 14 hard in confluence with Gile

Studio Cristo - Not Carlos Reservation to Las Typi Stock Servic South Greek - Lee Trail Read to service use with this Hour;

APPENDEX B. cont. Mr. Moreland

Re: Comments Draft LEIS Arizona Wild and Scenic Rivers

May 17 - Gile Box Segment

Managing Agency: Bureau of Land Management, Safford District

Private Land: 1.0 river miles, plus City of Selford.

DOTSTANDINGLY REMARKABLE VALUES

Section The Gile Ben gam its name from the troop diffs which rise abruptly downstream from where the Gila River passes under Highway 660. The 1000 foot walls of the canyon possess highly crod-Flighway 860. The 1000 look wast origins conjoin peasans injury error of volcanic and congistaments of formation which in frome to in corporate busings to the jurge. The San Francisco Rosen is a urburney which were use one Clin Box from the north and generate people. Because similar to the Sand Rosen of Clin Rever people. Because Cruste now shough a deep canyon joining the Girk River sales the end of the proposed agment. Four major regressing types are found along the river including figures, topograph should, detert should and governed. The secon surcounding the Gile Box contains an overlap of both Sonoran and

Chilemboan deservegenties.
Recreation: The annex qualities of the river, its riperten imbion, and in periogic features have made it as area of stratify increasing popularity. The Gila Box is used extensively for raining and exposing, hel-

ing, pionsking, and fishing.

Geologia: The walls of the river curpus are cut from volumic and volcanodiarde rocks. Contemnal activity is present at Gillard Her Serious located within 0.5 miles of the river.

Paid and Wildlife: The door's repute Paid and Wildlife. The river's ripartial vegetation, uncommon in the touthwest, creates a rich density and diversity of conststel wildlife. noth u qual, down must deep receiving and Rocky Mountain highers show. This enhanced widthe habitationshined with the map 1000 feet walk of the garge provides shelper for one of the most diverse repfor communities in the Southwest. Progrise Second and a mentaling population of held agies are two federally listed undergood species to

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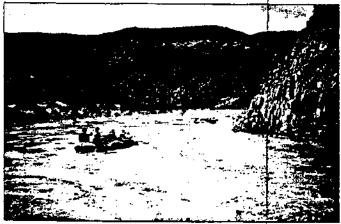
the area. Other state lineal and augment species include the black builted whiteling duck, black hawk, supery, attory egest, gress egert, and black provened sight beson. Engangered species of fish include the federally hand resorback makes and a number of other native fiches, as well as a discrete marmblage of non-recive fathers. The Gile Box is recognised as one of the prime potential recovery areas for a number of native falses.

OTHER CONSINERATIONS

This segment has been recognised as the last truly free-flowing reach of the Gira Bierr in Artsons. Sauceive less water housing appointation are present along this papears. Wild fie beenie des

ignation would enhance management of the area and proclude this remarkable areast of river from every being inundated by a respwair or otherwise developed.

Bonsts Creek Bown through land borned by the City of Safford, which depends on Bosire Creek for quach of the city water supply. Recreational designation of this portion of the creek is compatible with this use of the creek, and management of the entire creek from the Reservation as Will and Service will help course the habity, free-flowing wear that the city depends on.



GILA RIVER, GILA BOX SEGMENT (Phone juny Von Count)

APPENDIX B Mr. Moreland Re: Comments Draft LEIS Arizona Wild and Scenic Rivers Page 8 of 12

Berth Gila Riran Bante.

48 ~ UPPER BILL RIVER BARLS

ē

Bass Canyon - Hot Sp:

These two spring-fed streams cut through some of the most menic landscape in southern Arizona. Bass Canyon begins in the touthern portion of the Galiuro Mountains and flows touth to join Hos Springs Canyon at the Muleshee Ranch Preserva. The upper muches of Bass Campon flow shrough a mud-elevation riparian community of alder, sycamore, and sub proadening into a wide canyon bossom with a well developed contonwood-willow riperion forms. Hot Spring Conyan has several chernal spring feeding in as it can a narrow channel through unique and colorful eraded rack formations and eventually flows men the San Pedro River near Canabel These irolated streams support a creatal native filters, with a nere exemblage of species now found in only a few places.

AND RECOMMENDATION

521

De miles of Burn and Mot Springs Carpool Wild

Managing Agrandate Cooperation management agreement between The Nature Community, Community National Forms, and Burman of Land Management

Private Land: 10% of first talks by The Nature Conscretors.

DUTSTANDMIKE Y REMARABLE VALUES

South: The view from The Nature Conservancy's Muleshor Ranch Preserve is magnificent with puris and beign erodul hisbides commerkey with the buth green ripariers renormation of Bass Carryon and adjacent ureaces. Het Springs Canyon commine fictie riparien growth, but the seemic rock instructions and colors, the natural cody caryons, and many slot side tributa is make this school sets well worth risting. Sucrestion: The entire area is very soluted and has received little visitacen. More made require high character whiches to negotiate. Both capyons are just beginning to somet the interest of histen and carne lovers. Hor Springs Carryon contains several percentual pools that are popular for wading and retaine. Because of the highly serate prologic propulate for response and reasonage to the send diverse whiche species pro-formations, the rare assemblege of Eak and diverse whiche species pro-sent and the propulate location, then and Hot Springs Canyone offer a

fastirating history appearancy. species, the lost file date, Sanoran suckes, desert pucker, Gile chair and specialed classe, making this area one of the scates best undisturbed neuvr fisheres. The excellent operion forms and permise exams abo support many species of wildlife including some care species such as appreciation have and gray have. Federally listed species found in the area include the personne falcon and Senborn's long raised bet. State listed species include the common black hawk and the Gila thub, which was once wicespread chroughout the Gills was said and is now present in fewer dran 20 ales. There are also beauty populations of juvaline, ranks days, constrained, depart terrouse, and mountain from Rostogical: Sun Canyon and Hox Springs Canyon provide perenniAPPENDIX C Mr. Moreland

Re: Comments Draft LEIS Arbona Wild and Scenic Rivers

Page 9 of 12

ally dewing weet along their entire langths and support but tiparian forem in a very sent, her environment enabling many which species to chave. This undisturbed, review claused area provides crucial habitate for the regions typical wildlife as well as for many ears and senaltive species. These campons conscibute to see flows in the San Padro River spence, I need curyous concensure to per move as the best reason were their in a support downstream inguisate conventualities such as the extrastre manquist borques in the lighest San Perde ventrathed. The unusual secondage of the native fall practice is on introduced part of the Mulcahor's procession of plants. These were no introduced fish appoint present in such in the stream or mandam commenderary key second in the preservacion of the states regard fathery, but investige of exercic field ico is spesific recountrist contra

OTHER CONSIDERATIONS

The Mulanhor Ranch Preserve is a spique signation in Arlanca. The Nature Conservancy sequiend a subspaced parties of the mach and them stockselly sequelated a multi-spectry cooperative measurement agreement with the Corervada Niptinnal Forest. Bursens of Honor Management is over \$6,000 area of adjacent band. Wild said Scorne river designation would be an affirmation of the unnecedoped and printers. tine character of these streams.



Mag 22 - Bass Carryon - Hot Springs Carryon

Redfield Canyon - Si

The deep, rugged walls of Redfield canyon conceal a perennial stream which harbors native fish and an exceptional riparien habitat. It drains much of the wild, remote Galiura Wilderners Area of the Coronade National Forest. Only primitive, unmaintained roads approach the canyon, helping preserve in reclusion. The highly eroded rock formations, deep carbuled pools and lush riperion

ARC RECOMMENDATION

5

17 river miles of Registral Company and Process Springer, Wild

to observe many species of wildlife.

regetation are a photographer's par-

adie. The areas isolation and rich wibilife babitat make it a likely place

Managing Agest State Coronado Macinosi Force, Burgu of Land Management and Arisons Sour Land Department.

Private Land: 20% of proposed tiver rather are owned by The Nature

BUTSTANDINGLY HT MARKABLE VALUES

Secret: The ages is characterized by a network of catayons with spectactalar cliffs and rugged divides. The copography varies frote the bread, flat betterdand of lower Redfield Canyon to the deeply inclied and powerfully challenging Jackson and Systemore Compone. I Catyon is a very total deep, mercur canyon with a personally flow ing stream and an expensive reparties forms. It is provided by more to be more impressive than the well known America Carryon.

Recruetion: Access to this area is encremely rugged and requires a four wheat drive vehicle. The isolation and ruggedness provide an ourstanding wildersom experience for bilers and horsebook rider. It is considered and of Arizons's more united witherness event.

Section in The highly creded easyes walls and bottom consist of thyelion bestir and salt flow suffs. The layered volcanic totics include white ledge-forming suffic fractured and after and the high diff-forming sed taxas. Distinct land shapes woods from the different velcarite

Fish and Widdlet: The parential arrane provides important habiter for four autire fish species, including the state limit Gills challs. The mention siparan forms provide senting habitet for convious black hands and some tailed hands. Desert to resist, bighout sheep and nounteen lien frequent des regged compané.

Energiant This important riperian econymum with a spring-fiel

APPENDIX C. cont. Mr. Moreland

Re: Comments Draft LEIS

Artzona Wild and Scenic Rivers



scene the flow year round is but in ripures growth decrinated by rycumore, contonwood, selt. and militarine. Grustlands invaded by agree intergrade in manualin, oakland junioer woodbods. The canyon is well known for its great abundance and variety of parine block and large manacals, including transaction itom and black bear. This campon contains one of the few greates that is free of introduced fish species providing a safe rafuga for four native fiels species

College: A number of Native American sites have been identified in the area. There are a number of hopeostead cabins in the area conmibuting to the historical importance of the castyon.

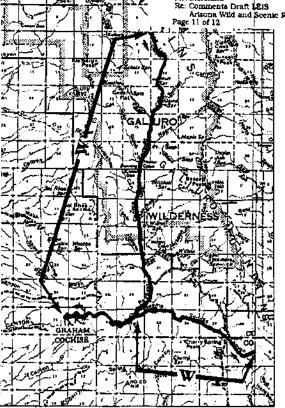
This area along with Base Conyon and Hos Springs Canyon make up the cooperatively managed entuge of over 56,000 acres known to the Mulashon Ranch Preserve, managed by The Nature Conservancy in conjunction with the Carocado National Forest, Bureau of Land Management, and Arisons State Land Department. All povelved parties recognize the unique values of them dearn streams and the important niche they Ell in the Southwest The queens of this unique cooperative

sturagestions agreement is custimony of the num's against dignificance.
The Radfold Canyon/Swamp Springs Canyon complex represents an area which clearly justifies designation as a wild river. In combina-tion of spectroulus attenty, ranged removement and exceptional wild its relies execteded with its perturbal streamflow set this area open as a truly special place. A wild river designation offers a level of long-serve rtion, which unlike other designations, recuse specifically on the ripercan resource. Non-designation will leave these segments of mreams value rate to activities their could seriously durainish or destroy those exceptional values outlined above.

San Poono Riven Basix ~ 19

SE - SAN PERRO MIVER BARIN

Arizona Wild and Scenic Rivers Page 11 of 12



Mas Z3 - Redfield Carron - Swamp Springs

60 ~ SAN PADRO BITTE BASCH

Virgin River

The Virgin River flows through three mates, originating worth and east of Zion National Park in the high mounsains of southern Utab, flowing through the deep redrock canyons of the Colorado plateau, and further on down through the eattern Majave deters before emptying into Lake Mand in Neuada. In Ariaana, the river cuts through an area of extens geologic faulting and folding, exposing numerous layers of the earth and providing spectacular menery, particularly in the Virgin River Gorge. This is one of the few remaining wild cribatories of the Colorado River.

ARE RECOMMENDATIONS

3) Mile of ther from Duk-Arizons sate los to Arizon-North star

\$ within from the little-foliance exists flow down to the first 1-15.

Smiles from 5-18 bridge to the Virgin River Compares of: Sand

I milys from pasyground to the Virgin Sires Serge; Bergerina

16 miles from Yogia Mare Gorge to Borrein state lines Secret

Managing System of Land Management

Princip Land: Ma siver cuite.

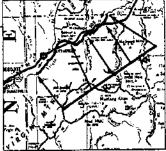
DUTSTANDMOLT HEMARKABLE VALUES

Seeses: The river care through a ragged curyon with with from 300 m 500 feet high. There's a uniquely beautiful river where one can see Joseph more, from the basin. On the southern motion, access is possible only by foot, hamback, or floating the fiver down from Utala.

Singlegist: The Virgin River down through a portion of the Huerkane Cliffs, which farm the western edge of the Colorado Planess. The rearrively flat places lies to the east, while the Beain and Rarge Petrilice with its Smithblock mountains and allowing-filled willeys is so the were. The over our a score garge several hundred fort deep along the faulend and collified Versia Mountains. Rocks in the cases wellinclude the Pennsylvanian Callville Limescene and the Cambrian Topos Group. The over is actively cooling for bed to this unrable

environment, acculturably subject to surchquakes.

Plan and Weeklah: The Virgin River is because for wound for anionous and Vergin countries that, both followly found an orderspeed, and the sease Level Virgot epideduce. The over also provides habitat for prespire Suns, California infromed but, spored but and outstones black-book. The Virgin provider a unique riparten meridar shrough an otherwise and region and is an amportant water source for a variety of wildlife, including the desert biginers thesp.



Mag 38 - Virgin River

Epological: This area is very important mismofreally as the ascissa-hundwaters of the Colorade Rivest before the Grand Canyon was curved. The BLM is studying all 20 miles of the Virgin Rever to latermine in-screen flow needs for fight and ripertan values.

The Virgin River was Identified a the original Newcool Riven. The virgit Area membrandingly bemanable some, geologic, and favoursy as having numeralizely bemanable some, geologic, and fab and viddis values. The Arianas foris 812M has found the sorric groungle, equate, and ripuran values of the river to be contentingly sumulable and the entire viver witch Arianos as digible for Wild & Somic designation.

The BLM-Arisons Strip District has recommended study of the Virgin River for incitation in the Wild and Scenic Rivers System. Nearby communities, through scaled and proposed diversions, characen the very editestor of the Arman appropriate of the Virgin River. As the lifeblood of the adjustent Beauty Dam Mountains and Palute we recommend on the appearent control total control and a Father Wilderman Anna, and as the principal creative fonce of Zioo National Park, the Vegin should reads to historical right to flow firstly and not be designated to a day-much. Wild land Stenic River designation will help to casure this figur

> APPENDIX D Mr. Moreland Re: Commenta Praft LEIS Arizona Wild and Scenic Rivers Page 12 of 12

98 ~ Traeje Atras Baste

100-1

100-2

100-4

523

Dear Mr. Moreland:

Mr. Phil Moreland

SENT 8Y:Xerox Telecopier 9020 : 7- 7-84 : 7:25PM :

First I would like to express my great disappointment on not being able to provide verbal comment at the May 24 beering in Thatcher. The hearing was advertised as ending at 10 FM, however I arrived at Sil FM to find the hearing had been adjourned at 8:50 PM. My two hour round trip expressly for the purpose of speaking at the hearing was wasted. It is my sincere hope that in the future, hearing officials stay for the antire adventised time frame.

July 7, 1994

602 640 2252;# 1

000100 wiesisch

I strongly recommend the "No Action" alternative for all 20 Arizona river sreas and particular those in Graham and Greenles counties. Any of the other alternatives would have a very detrimental effect on the socio-sconomic stupcture of the nearby communities. Listed below are these detrimental

1. The most productive copper mines in North America operate A. The most productive copper mines in North America operate adjacent to two of the river segments. In proximity to Monita Creek is the largest undeveloped copper deposit in North America. The potential for future major copper discoveries is staggering. Current and future employment opportunities could suffer as the nation losing a source of a strategic metal.

Proposed government purchases of private land further erodes an already limited tax base for local education and governments. 100-3

Reduction of grazing allotments would have local employment and the value of adjacent private

4. Overlapping of designations with Was being placed on top of NCA or critical habitat for TAE 100-5 species is wasteful and confusing.

levels Requirements for minimum inflow DESCRIPTION which adversely affects downstream provide amployment, food and fiber. 100-6 water USOT

Response 100 - 1: As the transcript record indicates, the hearing was adjourned at 8:45pm. Prior to the adjournment there had been an extended recess to wait for late arrivals.

When you arrived you were encouraged by the Bureau of Land Management officials, who had remnained in the auditorium, to mail your review comments to the Bureau of Land Management State office.

Response 100 - 2: Please refer to general response # 2 (Economic Impacts).

Response 100 - 3: Please refer to general response # 6 (Land Acquisition).

Response 100 - 4: Grazing decisions for the Gila Box and Bonita Creek were made in the Upper Gila San Simon Grazing Environmental Impact Statement (1978). These decisions were incorporated by reference into the Safford District Resource Management Plan (1991).

Response 100 - 5: Please refer to general response #7 (Multiple Designations).

Response 100 - 6: Please refer to general response # 5 (Instream Flow Water Rights).

SENT BY:Karex Telecopier 7020 ; 7- 7-94 ; 7:25#4 ; 802 646 2252:# 2 In general, I feel the so called "protection" offered by a Mild and Scenic designation is grossly overstated. Natural rain runoff events are far more destructive than even the 100-7 most destructive human being or the gost serious overgrasing.
On three of the segments in my area I have personally witnessed the before and after affects of the January 1993 flood. Low bar stream hunks formerly covered with grass and small willows and cottonwoods are now boulder fields with washed out five feet in diameter cottonwoods laying in them. High bar stream banks covered with masquite are now minus six to thirty feet of their outer adgs. These same areas had not recovered to their pre-1983 condition. In conclusion, I strongly request the "No Action" Ridard Thavis Richard C. Travis Greenlee Co. PFW Box 1181 Morenci, AZ 85540 524

Response 100 - 7: Please refer to general response # 9 (River Study Area Protection).

July 6, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arisons State Office, B.U. M. 3707 Morth 7th Street P.O. Box 16563 Phoenix, Arisons 85011

Re: Comments on Draft Wild and Scenic Rivers Study legislative Environmental Impact Statement

102-1

I would recommend and support no action siternative. First and forsmost, I do not believe the Virgin River qualifies for Mild and Scenie designation. Until the City of St. George moved it's wests weter treatment plant below Bloomington 3 years ago, the river mater mover reached through the virgin river gorge after the spring run-off, except during a thunder storm. In fact, all the virgin river water is divered duton the washington fields canal in the apring svery year. There is a small amount of recharge to the river below this diversion dam, but until the wests water treatment plant was moved, this racherge did not ever each the amount of ithe years up stream from the Arlzona Scate lime in the summer months. This same thing will adour as soon as the alty pumps this wests water bask up to reuse it, which they are planning to do in the very mean future. This includes all the wild and descrip segments of the river in Arizona.

the Arizons segment of the Virgin River is pertially within the Painte and Seaver Dan Vilderness areas. It is also within the Virgin River Area of Critical Environmental Concern. Hazagement prescriptions are in place to affer ample protection for the river without Mild and Seemic designation,

It is stated that if the 8.L.W. Resource Management plan datarmines that there are no significant adverse impact, the river ares is determined to be aligible and tentatively classified as wild, seemin, or recreational. The Virgio River should suver have passed this R.W.P. planning system test, because there mould be highly significant impacts. Were these impacts identified and addressed?

102-2

The draft pintes that designation as Wild Scenic or Recreational on the Virgin River would not affect existing, valid water rights. Are unparfected rights cessidered to be walld or existing? All present and future water rights head to be set before instream flows should even be considered. How can Wachington County's water rights be protected if no dame could be built? As attend in this draft "The existing and future demands far axceed the rivers supply."

Response 162 - 1: Please refer to general response # 11 (Suitability Determinations).

Response 102 - 2: Under Utah law the state engineer recognizes two types of rights that apply to waters in Utah: perfected and unperfected.

"Perfected rights" have been applied for, developed, put to beneficial use, and a certificate of right issued by the state engineer. Any rights reserved to the federal government under a wild and scenic river designation would have priority as of the date of designation, and would not affect "perfected" or certificated water rights in Utah.

"Unperfected rights" are those that have not been developed, put to beneficial use, or certificated by the state water engineer. These have a priority based on date of application. A federal reserved right resulting from wild and scenic river designation would presumably have a priority based on the date of designation. It is unknown whether "unperfected rights" would be affected. Presumably, any consequences would be determined through either the state water engineer's administrative hearing process or through litigation.

The Virgin River is Emshington County's only long term solution to a growing water problem. From 1980 to 1990 the population of the county increased from 26,125 to 43,500, or SEI, Projected increases through 2010 veries from 663 by the Sive county sescelation of governments, to 1095 by the State of Utah, so 1262 be the State of Utah, so 1262 by the Washington County water conservancy district. These needs san only be met by etering winter and spring rus-off waters in reservoirs for summer use. The river designation would not allow for this.

Did the R.M.P.-E.I.S, describe the public concern and support for the designation? The state, local or federal interest in the

In beeping with the requirements of M.E.P.A., the socia-economic impaste of this sotion must be theroughly explored and addressed.

102-3

On page 18 of question and asswers under Range Management, (Q) what is the effect of designation on greeing? The enswer is somewhet contradictory in stating generally agricultural and greeing activisies present at the time of designation would not ba effected. Fet under agriculture precions, 4.6., it eteres livestonk grasies and related structures may continue along adjacent lands outside the querter mile designated corridor provided they do not cause erasion, and proceer water quality. scenic and wildlife values. When about inside the quarter mile corridor? This statement could and probably would eliminate livestock grazing where the river is the source of water for the liveetock.

The B.L.M. now has the authority to protect and memoga these river asymants, for multiple use, without the added restrictions that designation would impose.

Another concern I have is that after the "Area Hennger" daturminus if a river or segment of a river is sligible, interim massures (as nueded) shell be taken immediately to protect and manage the river and surrounding area in a fashion demperable to rivers already included in the Wild and Scanic Rivers eyatam. This is much the same as defects wilderness that we are now experiencing with our W.S.A.'s Now many years will this process take? As many as some of our wilderness designations?

Clearly the negative impacts of the designation of the Virgin River and ice tributaries, must be thoroughly researched and identified, with public participation, before they are determined to be suitable for inclusion in the Mational Wild and Scanic Rivers System.

I feel this protective management, before eligibility and exitability is determined, is unfair. It rould serve no purpose Response 102 - 3: The question and answer material to which you refer was prepared for and distributed during the scoping meetings. As such, it is not part of the environmental document. However, even under a wild river designation, according to the Bureau of Land Management Manual Section 8351, Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, and Management, livestock grazing would be allowed "to the extent practiced before designation" (MS 8351.51A2e).

Response 102 - 4: The issue of protective management is associated with the management of eligible rivers. The statement is made in chapter 3 (Affected Environment) that "the resources [in this document] are described as they would be managed without protective management." This legislative environmental impact statement evaluates the impacts of implementing various alternatives, and provides recommendations to Congress regarding wild and scenic river suitability.

FROH 8216291871

7080 3

but to lock up the virgin fiver from any type of development and wany other uses, for years to dome, not only in Aritona but in Utah as wall.

Respectfully,

St. George, Utak 64170

DB/mad

JUL-86-94 FR! 23:16 TON STEUTER

JUL 0 1 1994 ": " 1

000106

Philip Moraland Planning, Environment, Lands and Recreation (931) Arizone State Office, Buroou of Land Hanagement

Thanks for the opportunity to comment.

P.O. Bax 16563 Phoenix, Az. 85011

July 8, 1994

106-1

Dear Mr. Noreland,

Poster Facilities 1. Philo Musicano

I wish to thank you for your excellent Legislative Environmental Empact Statement and your proposed Action Alternative to designate 27 segments in 13 fiver study areas as suitable for inclusion in the Mild and Scenic Rivers Act. I am particularily proud that portions of the Agua Fria river are included in your proposal, it is my little Grand Conyon and I very much enjoy hiking in that area.

I am disappointed, however, that Cienzya Craek and the Hasseyampa Rivor are not included in your proposed alternative. Soth of thems areas to me have unique qualities that qualify them for designation. Ciencega craek may not now be threatened by dams or diversions but the craek should simply be judged on its own merits, not on the absence or presence of threats. The Hasseyampa may be complicated to administer due to the amount of private land, but the Box Canyon area has high recreational values that could be enhanced by M-S designation.

Thanks for the opportunity to comment.

Don Steuter 2508 I. Heatherbrae Phy., Az. 85016

> Response 106 - 1: Please refer to general response # 8 (Cienega recommended alternative).

2004/804

7UL 1 1 1994

67800 000107

Barbara B. Wilson 8645 M. Wayerose Rd Tucson, AZ 85743

Mr. Phil Moreland Bureau of Land management Arizona State Office 3703 N. 7th St. Phoenix, AZ 85014

Gear Mr. Moreland:

107-1

528

I was delighted to learn last week that SLM is drawing up plans to protect parts of six southern Arizona rivers on BLM land from further development. I was dismayed, however, to learn that a 10.3 mile segment of Cienega Creak was excluded from the list. As pointed out in an article in the Tucon Daily Star on May 21, 1994, the Cienega Creak wetland is one of the last and bast examples of a relatively intact cleanugs, particularly as it has not been populated by non-netive fish. This is especially important since the Oila Topainnow is an andangered spaces. Given the short distance of the creak from Tucson, it should be protected for future generations of Tucsonians and others desirous of visiting a gristine wetlands unsullied by development.

Please include the Cienega Creek watlands on the list of rivers to be protected on the Wild and Scenic Rivers System. Such a beautiful, endangered wetlands should be protected from all future development. Instauch as over 90% of the native riperian areas in Arizona have been lost, it is incumbent upon us to save and protect the remaining wetland areas, including Cienega Creek.

Sincerely

Barbara R. Hilson

Sarbara 8. Wilson

cc. Senator Dennis DeConcini Representative Jim Kolbe Representative Sam Coppersmith Secretary Bruce Babbitt Response 107 - 1: Please refer to general response # 8 (Cienega recommended alternative).

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Arizons State Office, B.L. M. 3707 North 7th Street P.O. Box 16563 Phonnix, Arizona 85011

109-1

Re: Comments on Braft Wild and Scenic Rivers Study - Legislative Environmental Impact Statement

I would recommend and support no action alternative. First and foremost, I do not believe the Virgin River qualifies for Wild and Scenic designation. Until the City of St. George moved it's waste water treatment plant below Bloomington 3 years ago, the river water never reached through the virgin river gorge after the apring run-off, except during a thunder storm. In fact, all the virgin river water is diverted into the wathington fields canal in the apring every year. There is a small amount of recharge to the river below this diversion dam, but until the waste water treatment plant was moved, this recharge did not even reach the mouth of the gorge up stream from the Aritona State line in the summer months. This same thing will occur as soon as the city pumps this waste water back up to reuse it, which they are planning to do in the very near future. This includes all the wild and scenic sugments of the river in Arizona

The Arizons aggment of the Virgin River is partially within the Painte and Beaver Dem Wildernuss areas. It is elso within the Virgin River Area of Critical Environmental Concern. Management prescriptions are in place to offer ample protection for the river without Wild and Scenic designation.

It is stated that if the B.L.M. Resource Management plan determines that there are no significant adverse impact, the river arem is determined to be eligible and tentatively classified as wild, scenic, or recreational. The Virgin River should never have passed this R.M.P. planning system test, because there would be highly mignificant impacts. Mere these impacts identified and addressed?

The draft states that designation as Wild Scenic or Recreational on the Virgin River would not affect existing, valid water rights. Are unperfected rights considered to be valid or existing? All present and future water rights need to be met before instreas flows should even be considered. How can Washington County's water rights be protected if no dams could be built? As attacd in this draft "The existing and future demands far exceed the rivers supply."

 Response 109 - 1: Please see responses to letter 102

Page 2

The Virgin River is Washington County's only long term solution to a growing water problem. From 1980 to 1990 the population of the county increased from 26.125 to 45,500, or 867. Projected increases through 2010 varies from 66% by the five county association of governments, to 109% by the State of Utah, to 186% by the Washington County water conservancy district. These needs can only be met by storing winter and spring run-off waters in tesservoirs for summer use. The river designation would not allow for this.

Did the R.M.P.-E.I.S. describe the public concern and support for the designation? The state, local or federal interest in the designation?

In keeping with the requirements of N.E.P.A., the socio-economic impacts of this action must be thoroughly explored and addressed.

On page 18 of question and answers under Range Management. (Q) what is the effect of designation on grazing? The answer is somewhat contradictory in stating "generally agricultural and grazing activities present at the time of designation would not be offacted", yet under agriculture practices, e.g., it states livestock grazing and related structures may continue along adjacent lands outside the quarter mile designated corridor provided they do not cause erosion, and protest wear quality, scenic and wildlife values. What about inside the quester mile corridor? This statement could and probably would eliminate livestock grazing where the river is the source of water for the livestock.

The B.L.M. now has the authority to protect and manage these river segments, for multiple use, without the added restrictions that designation would impose.

Another concern I have is that after the "Area Manager" determines if a river or segment of a river is eligible, interim measures (as needed) shall be taken immediately to protect and manage the river and surrounding area in a fashion comparable to rivers already included in the Wild and Scenic Rivers apstem. This is much the same as defacto wilderness that we are now experiencing with our W.S.A.'s How many years will this process take? As many as some of our wilderness designations?

Clearly the negative impacts of the designation of the Virgin River and its tributaries, must be thoroughly researched and identified, with public participation, before they are determined to be suitable for inclusion in the National Mild and Scenic Rivers system.

I feel this protective management, before eligibility and suitability is determined, is unfair. It <u>could</u> serve no purpose

Page 3

but to lock up the virgin river from any type of development and many other uses, for years to come, not only in Arizons but in Utah as well.

Respectfully.

Duane Blake

Duane Hiske 1239 E. Lizzie Lane St. George, Utah 84770

DB/med

BUL I I TERE

000110 3135 West Kings Avenue Phoenix, Arizona 85023

RECEIVED SAME AT STAIL OFFICE

Jul. 11 194

July 6, 1994

ATTN: Bureau of Land 900 A tempt

I am writing this letter in support of preserving our rivers. I understand that there is currently lagislation in progress to destroy the rivers by opening more dams or cutting off the water supply. I strongly support the survival of our precious, natural rivers with all their beauty and life. If there is any other way that I can show my support, please contact me. Thank you.

Sincerely,

Cheryl D. Beilfuss
Whife D. Deinfuss

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000111

Paul W. Huddy 3455 8. Third St. Tucson, AZ 85716-4229 July 1, 1994

Phillip Moreland, Branch Chief Planning, Environment, Lands and Recreation (931) Bureau of Land Management P. O. 80x 16563 Phoenix, AZ 85011

Dear Mr. Moreland:

Thank you for your information on the BLM's Draft Wild and Scenic Rivers EIS. This is a process that I have followed for many years and I regret that time constraints will severely limit my response.

First, I would ask the BLM and other decision makers to rise above the detail of this necessarily detailed process and try to understand and appreciate how important and special each of these rivers are in an arid state like ours. Ruman impact has so head deteriorated riperian environments in Arizona that probably less than 5% of it still survives intact. One way or another, we must work hard to successfully protect what is left: their value and every further loss is magnified by how small and fragile is the remaining resource.

532 111-1

What is most striking about this BIS is the continual use of "segments" as a framework for evaluation and discussion. This suggests a focus on ownership and management rather than the resource itself. A river is not a segment.

111-2

Time after time the recommendations throw out one "segment" after another because it would be "impractical" or too "difficult" to manage. As this study documents, the future of many of these rivers is very dependent on these eleventh hour decisions. Feilure to manage these difficulties may mean losing those rivers.

We can no longer afford the luxury of waiving away the "important ecological foundations of our world - the one we ourselves depend on for survival.

A healthy river and riparian system must be considered and protected as an ecological whole. It looks like what is really needed here is a process that involves all owners, agencies and managers to examine how to best care for each of these rivers and basine along their entire length.

Let's reassess our situation and recognize how important this work is to the future of our state. Let's renew our commitment and determination to preserve and protect what little is left of Arizona's rivers. Let's find new ways to overcome the "difficult" and "impractical" and save these rivers: the opportunity may not Response 111 - 1: The word segment is frequently used in the Wild and Scenic Rivers Act.

Response 111 - 2: Please refer to general response # 1 (Alternatives).

come again.

Briefly, this EIS is significantly flaved in a number of other

It's organization, by various categories and issues. further fragments and disrupts consideration of the rivers as whole. There are many passing allusions to other considerations that are

not fully explained.

The reasons for unsuitability are, likewise, not fully explained. Alternative management actions are enumerated, but it is not clear how they differ from Wild and Scenic designation or how they would accomplish the same purposes, if indeed they do.

The BLM's Cienega Crack finding of unsuitability on the basis of "not nationally significant" is very disturbing and should be reconsidered. What other rare clenega-type creeks or rivers are included in the Mational Wild and Scenic River System?

> I am glad to see Aravaipa Cr. included and appreciate the BLM's work in managing the Wilderness Area. Although existing management options may suffice to protect Turkey Creek, it is not clear from the draft BIS why it was found unsuitable.

The Hasmayampa River should be evaluated snew for the reasons I discussed above. Private ownership is not necessarily a barrier to Wild and Scenic protection, which would help resolve recurrent threats to this special river. The long-term public interest should prevail over short-term private interests.

I am also glad to see the San Padro included, but again it is not clear why the decision was made to split it into two segments and omit the two-mile section adjacent to private land. I also disagrae with the determination that it be classified "Recreational" rather than "Scenic." Your own report states that it has "outstandingly remarkable scenic ... values" [Appendix, v 2, San Pedro, p 15, III.A., first sentence]. It seems to me that "Scenic" designation is more appropriate and better for the resource.

The report is correct in recognizing the high value of the Virgin River and its suitability for the Wild and Scenic River System, but very wrong in suggesting delay and further study. If the BLM can deal with segments of other rivers, why can it not do so in this came? Given the Utah BLM's notorious regard for local special interests, such coordinated study would probably amount to defacto inaction in this case, contrary to the public interest in preserving this outstanding resource.

Twenty-six years have passed since enactment of the National Wild and Scenic Rivers Act. Action on protecting remaining Arizona rivers is long overdue. Thank you for contributing to that important work. Please send a copy of your final EIS.

Response 111 - 3: Please see general response # 3 (Eligibility Determinations). The Bureau of Land Management has no authority to study river segments over which it does not have administrative responsibilities.

Response 111 - 4: Please refer to general response #8 (Cienega recommended alternative).

Response 111 - 5: Please see response # 11 (Suitability Determinations).

Response 111 - 6: Please refer to general response # 11 (Suitability Determinations).

Response 111 - 7: The proposed action/ recommended alternative for the Virgin River was originally defined in the Arizona Strip District Resource Management Plan (1991). Until a Congressional decision on designation is made, management actions for the river will be identified in the wilderness management plan, resource management plan, and area of critical environmental concern management plan, identified in chapter 2, would be implemented.

111-6

111-5

111-7

111-3

Dos Cebazas Route Box 6309 Willcox, AZ 85643

July 4, 1994

Phillip Moreland, Branch Chief Bureau Of Land Management 3707 North 7th Street P.O. Box 16563 Phoenix, AZ 85011

Re: National Wild and Scenic Rivers System

Dear Mr. Moreland:

Many Southwestern rivers have long been ignored and are finally being recognized because of their diverse and remarkable resource values. In addition to precious surface water, river values include recreational, scenic, geologic, fish and wildlife, historic and cultural sites.

Some rivers in the Southwest, even though ephemeral, are also unique and maintain a subsurface flow so vital to many life forms. Recent biological studies have indicated the loss of approximately 90 per cent of the riparian areas in the state, while approximately 80 per cent of faunal species are directly associated with these areas. With this in mind, we cannot afford or allow those streams that remain undesignated to be regulated through less stringent standards when they are eligible for greater protection provided through this current review process.

As the inevitable development of this state continues, it becomes crucial to have maximum protection beyond <u>local</u> current management levels to asfeguard these unique areas. Just maintaining small isolated or selected riparian "vaccums" will not sustain a rich biological diversity or insure wild rivers for those that follow.

I have had the opportunity to explore, visit and enjoy portions of almost all of the study areas included in the BLM Draft. I, therefore, support your review process and recommend and encourage your actions to extend and expand so as to include the All Suitable Alternatives that pertain to the 20 respective rivers, especially those not currently protected by some sort of direct Congressional designation.

The beauty, solitude and relatively undisturbed character of these rivers deserve as much protection as possible. The recognition of these resources as "National Treasures" in the form of federal protection through Congressional action becomes increasingly more important as our society grows and expands.

Respectfully

Dan Fischer

Response 112 - 1: Please refer to general response # 1 (Alternatives).

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112-1

Letters received after the close of the comment period	ł

State of Utah

Mithed O. Leavill Company Ted Steven Executive Director

1636 Wasi North Temple, Subs 316 SaR Essa Chy, Utah 64116-3192 801-536-7315 (Fee) 100

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July 26, 1994

Nr. Roger G. Taylor, District Manager Bureau of Land Management Arizona Strip District Office 390 North 3050 East St. George, Utah 84770

Dear Mr. Taylor:

The Utah Department of Natural Resources (DNR) is providing the following comments on BLM's Draft Arizona Statewide Wild and Scenic River Legislative Environmental Impact Statement (Draft LEIS):

In general, the DNR supports justifiable wild and scenic rivers designation— We, however, are concerned with the extent to which the Wild and Scenic Rivers Act allows designation of intermittent and non-perennal streams, designation of streams that are not free-flowing but are included under a liberal definition of free-flowing and designation of stream segments that are judged to have wild or scenic outstandingly remarkable values (DRY) but tends to actually act as a de facto wilderness declaration that sidesteps the process of wilderness designation.

We are also very concerned with the lack of response and clarification of requests made to BLM concerning the effect designations would have on water resources/water rights above the designated segments. For example, will the statement that wild and scenic rivers are established to maintain the "existing conditions" be used to prevent any increased use of water (i.e., development of existing but undeveloped water rights) above the designated segment?

The inclusion of the Virgin River segments seems to be a prime example of a designation that raises concerns with your determination that it is free-flowing and that it meets the test of ORV, given the degree the construction of 1-15 through the narrows has altered the river channel.

We, however, are also concerned about the unanswered question as to what effect the designation of wild and scenic rivers status for the Virgin River, Kanab Craek and Paria River segments will have on Utah's ability to manage and develop its water rights and water resources.

Mr. Roger G. Taylor July 26, 1994 Page 2

We, therefore, respectively request the Kanab Creek and Virgin River segments not be included in the wild and scenic rivers inventory until our questions concerning the effect of designation have been answered and the responses have been given appropriate consideration.

Sincerely,

Tel Stewart

Ted Stewart

112 Ocodilo Rest Morend, AZ ESSA



Mr. Phil Moreland, Chief Bd. of Planning AZ. St. A. Office P.O. Box 16563

MARIN Phanix, AZ. 85014

Dear Sin:

RE: Wild & Servic Rich legislation
We do NOT want it and sol

don't need it!!

Neither do we want or need a

Notical Biological Survey! No Way!!!

Jeane things alone!! Survey! Sincerely day Clark

Mo Bills!

Mo Bills!

Mo Bills!

Mo Rich AZ.

Bureau of Land Management, 1994

Bureau of Land Management, 1994

ACTIVITY PLAN: A detailed, specific plan necessary to implement the more general resource management plan decisions for a single resource program or plan element.

ALLOTMENT: An area of land assigned to one or more livestock operators for grazing livestock.

ALTERNATIVES: Different ways of addressing the environmental issues and management activities considered in the environmental impact statement. These serve to provide the decision maker and the public a clear basis for choices among options.

ANIMAL UNIT MONTH: The amount of forage necessary for the sustenance of one cow or five sheep for one month.

AQUATIC HABITAT: Habitat that is inundated by water with a frequency sufficient to support a prevalent form of aquatic life.

ARCHAEOLOGICAL DISTRICT: An area that provides a concentration of cultural properties in a discrete, definable location.

AREA OF CRITICAL ENVIRONMENTAL CONCERN: An area within the public lands where special management attention is required to protect important historic, cultural, or scenic values, fish and wildlife or natural systems or processes, or to protect life and safety from natural hazards.

BASE FLOW: The amount of stream flow that is maintained by groundwater inflow to the stream and is therefore relatively constant, even during dry periods.

BIOLOGICAL COMMUNITY: A group of plants and animals living together in a common area and having close interactions.

CLASSIFICATION: The process whereby designated rivers are segmented according to the criteria and classes (wild, scenic, and/or recreational river areas) established in Section 2(b) of the Wild and Scenic Rivers Act.

CRITICAL WILDLIFE HABITAT: The area of land, water and airspace required for the normal needs and survival of a species.

CRUCIAL WILDLIFE HABITAT: Sensitive use areas that are necessary to the existence, perpetuation, or introduction of one or more species during critical periods of their life cycles.

CULTURAL RESOURCES: Those fragile and nonrenewable remains of human activities, occupations, and endeavors as reflected in sites, buildings, structures, or objects. Cultural resources are commonly discussed as prehistoric or historic values.

DESIGNATION: The process whereby additional components are added to the National Wild and Scenic Rivers System under Section 2(a) of the Act. Inclusion of a river area into the National Wild and Scenic Rivers System (NWSRS) either by Act of Congress under section 2(a)(i) or by administrative action of the Secretary of the Interior with regard to State designated rivers under section 2(a)(ii).

ECONOMIC IMPACT: The change, positive or negative, in economic conditions that directly or indirectly result from an activity, project or program.

ECOSYSTEM: A complex self-sustaining natural system which includes living and nonliving components of the environment and the circulation of matter and energy between organisms and their environment.

ELIGIBILITY: Qualification of a river for inclusion into the National Wild and Scenic Rivers System through determination that it is free-flowing and with its adjacent land area possesses at least one river-related value considered to be outstandingly remarkable.

ENDANGERED SPECIES ACT OF 1973 (as amended): Federal law to ensure that no federal action will jeopardize federally listed or proposed threatened or endangered species of plants or animals.

EXISTING RIGHT-OF-WAY CORRIDOR: A parcel of land, with fixed limits or boundaries, that is being used as the location for one or more rights-of-way.

FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976: Public Law 94-579, which gives the BLM legal authority to establish public land policy, to establish guidelines for administering such policy and to provide for the management, protection, development and enhancement of the public land.

FLOODPLAIN: The nearly level alluvial plain that borders a stream or river and is subject to inundation during high water periods; that relatively flat area or lowland adjoining a body of standing or flowing water which has been or might be covered by floodwaters.

FREE-FLOWING: Existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway. (Section 15(b) of the Wild and Scenic Rivers Act).

HABITAT MANAGEMENT PLAN: A written and officially approved plan for specific geographic area which identifies wildlife habitat and related objectives, establishes the sequence of actions for achieving objectives and outlines procedures for evaluating accomplishments.

LEASABLE MINERALS: Minerals such as coal, oil and gas, sodium, and all other minerals that may be acquired under the Mineral Leasing Act of 1920, as amended.

LOCATABLE MINERALS: Any valuable mineral that is not saleable or leasable, including gold, silver, copper, tungsten, uranium, etc.

MANAGEMENT FRAMEWORK PLAN: A planning decision document prepared before the effective date of the regulations implementing the land use planning provisions of the Federal Land Policy and Management Act.

MINERAL ENTRY: The location of mining claims by an individual to protect his right to a valuable mineral.

MINERAL MATERIAL DISPOSALS: Disposal of sand, building and decorative stone, gravel, pumice, clay and other mineral materials and petrified wood through permit or contract for sale or free use.

MINERAL WITHDRAWAL: Closure of land to mining laws, including sales, leasing, and location, subject to valid existing rights.

MINING PLAN OF OPERATION: See Plan of Operations.

MITIGATING MEASURES: Methods used to reduce the significance of or eliminate an anticipated environmental impact.

MITIGATION: The lessening of a potential adverse effect by applying appropriate protection measures.

MOTORIZED TRAVEL: Travel in any motorized vehicle for recreation purposes; includes driving or riding in off-highway areas.

MULTIPLE-USE MANAGEMENT: Management of public lands and their resources so that they are used in the combination best meeting the present and future needs of the American people.

NATIONAL REGISTER OF HISTORIC PLACES: A list of districts, sites, structures, and objects significant in American history and culture maintained by the Secretary of the Interior.

NATIONAL WILD AND SCENIC RIVERS SYSTEM: Established by the Wild and Scenic Rivers Act of 1968 to protect rivers and their immediate environments that have outstanding scenic, recreational, geologic, fish and wildlife, historic, cultural, and other similar values and are preserved in free-flowing conditions.

NATIONAL WILDERNESS PRESERVATION SYSTEM: Established by the Wilderness Act of 1964 the system is composed of federally owned areas designated by Congress as wilderness areas.

OUTSTANDINGLY REMARKABLE VALUES: Values among those listed in Section I(b) of the Wild and Scenic Rivers Act: "scenic, recreational, geological, fish and wildlife, historical, cultural, or other similar values . . ." Other similar values which may be considered include ecological, biological or botanical, paleontological, hydrological, scientific, or research values.

PATENT: A government instrument (or deed) that conveys legal title for public land to an individual or another government entity.

PLACER MINING: That form of mining in which the surface soil is washed for gold or other valuable minerals.

PLAN OF OPERATIONS: A plan for mining exploration and development that an operator must submit to BLM for approval when more than 5 acres a year will be disturbed or when an operator plans to work in an area of critical environmental concern, or wilderness area. A Mining Plan of Operation must document in detail all actions the operator plans to take from exploration through reclamation.

PREFERRED ALTERNATIVE: That alternative, in the environmental impact statement, which management has initially selected as offering the most acceptable resolution for the issues and concerns.

RESOURCE MANAGEMENT PLAN: A written land use plan that outlines BLM's decisions and strategies for management of the resources in a particular area. The Resource Management Plan replaces the Management Framework Plan in BLM's planning system.

RIGHT-OF-WAY: The legal right for use, occupancy, or access across land or water areas for a specified purpose or purposes. Also the lands covered by such a right.

RIPARIAN NATIONAL CONSERVATION AREA: An area of outstanding riparian, and other resource values, designated by Congress for the protection and enhancement of these values.

RIPARIAN HABITAT: Areas of land directly influenced by permanent water and having visible characteristics, such as a vegetation type which reflects the presence of permanent surface or subsurface water.

RIVER: A flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes. (Section 16(a) of the Wild and Scenic Rivers Act).

RIVER AREA: That portion of a river (segment or corridor) authorized either by Congress or an agency for study and its immediate environment comprising a minimum area extending at least 1/4 mile (1/2 mile to 2 miles in Alaska) from each river bank. For designated rivers, the river and adjacent land within the authorized boundaries.

SALEABLE MINERALS: See Mineral Material Disposals.

SCENIC CORRIDOR: The area encompassing the foreground-middleground zone along roadways.

SCOPING PROCESS: An early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.

SPECIAL STATUS SPECIES: Wildlife and plant species either federally listed or proposed for listing as endangered or threatened, state-listed or BLM-determined priority species.

STIPULATION: A requirement, usually dealing with protection of the environment, that is made a part of a lease, grant, or other authorizing document.

UNIQUE WATERS: The state sets water quality standards for unique waters. Streams are designated as unique waters on the basis of good water quality and at least one of the following criteria: exceptional recreational or ecological significance, or the provision of critical habitat for threatened or endangered species.

WETLANDS: Lands including swamps, marshes, bogs, and similar areas such as wet meadows, river overflows, mud flats, and natural ponds.

WILD AND SCENIC STUDY RIVER: Rivers identified in Section 5 of the Wild and Scenic Rivers Act for study as potential additions to the National Wild and Scenic Rivers System. The rivers shall be studied under the provisions of Section 4 of the Wild and Scenic Rivers Act.

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REFERENCES

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1991 <u>Arizona Rivers: Lifeblood of the Desert; A Citizens' Proposal for the Designation of Rivers in Arizona,</u> Phoenix.

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Bureau of Land Management, 1994

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Bureau of Land Management, 1994

APPENDIX 1



UNITED STATES DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE ARIZONA ECOLOGICAL SERVICES STATE OFFICE 3616 West Thomas Road, Suite 6 Phoenix, Arizona 85019



Telephone: (602) 379-4720 FAX: (602) 379-6629

2-21-94-1-082

January 4, 1994

MEMORANDUM:

TO: State Director, Bureau of Land Management, Phoenix, Arizona

FROM: State Supervisor

SUBJECT: Section 7 Consultation

This letter is in response to your December 1, 1993, request for information on listed or proposed threatened or endangered species and candidate species that may occur in the 20 eligible Wild and Scenic River Study Areas outlined in your memorandum.

Our data indicate the following listed and candidate species may occur in the following study areas:

Agua Fria River (Yavapai County)

Endangered

American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

Spotted bat (Euderma maculatum)

California leaf-nosed bat (Macrotus californicus)

Yavapai Arizona pocket mouse (Perognathus amplus amplus)

Loggerhead shrike (Lanius ludovicianus)

Ferruginous hawk (Buteo regalis)

Chuckwalla (Sauromalus obesus)

Desert tortoise (Sonoran population) (Gopherus agassizii)

Mexican garter snake (Thamnophis eques)

Arizona toad (Bufo microscaphus microscaphus)

Lowland leopard frog (Rana yavapaiensis)

Desert sucker (Catostomus clarki)

Hohokam agave (Agave murpheyi)

Aravaipa Creek (Graham & Pinal Counties)

Endangered

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)
American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Threatened

Loach minnow (Tiaroga cobitis) Spikedace (Meda fulgida)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Loggerhead shrike (Lanius ludovicianus)
Lowland leopard frog (Rana yavapaiensis)
Desert sucker (Catostomus clarki)
Sonora sucker (Catostomus insignis)
Roundtail chub (Gila robusta)

Big Sandy River (Mohave County)

Aravaipa sage (Salvia amissa)

Endangered

American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Spotted bat (Euderma maculatum)

California leaf-nosed bat (Macrotus californicus)

Yavapai Arizona pocket mouse (Perognathus amplus amplus)

Hualapai southern pocket gopher (Thomomys umbrinus hualapaiensis)

Ferruginous hawk (Buteo regalis) (wintering only)

Loggerhead shrike (Lanius ludovicianus)

Desert tortoise (Sonoran population) (Gopherus agassizii)

Chuckwalla (Sauromalus obesus)

Rosy boa (Lichanura trivirgata)

Arizona toad (Bufo microscaphus microscaphus)

Lowland leopard frog (Rana yavapaiensis)

Sonora sucker (Catostomus insignis)

Bill Williams River (Mohave & La Paz Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Spotted bat (Euderma maculatum)
California leaf-nosed bat (Macrotus californicus)
Yavapai Arizona pocket mouse (Perognathus amplus amplus)
Hualapai southern pocket gopher (Thomomys umbrinus hualpaiensis)
Ferruginous hawk (Buteo regalis) (wintering only)
Loggerhead shrike (Lanius Iudovicianus)
Rosy boa (Lichanura trivirgata)
Desert tortoise (Sonoran population) (Gopherus agassizii)
Lowland leopard frog (Rana yavapaiensis)
Arizona toad (Bufo microscaphus microscaphus)
Roundtail chub (Gila robusta)
Sonora sucker (Gatostomus insignis)

Bonita Creek (Graham County)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)
Razorback sucker (Xyrauchen texanus) with proposed critical habitat

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Greater western mastiff-bat (Eumops perotis californicus)
Northern gray hawk (Buteo nitidus maximus)
Loggerhead shrike (Lanius ludovicianus)
Ferruginous hawk (Buteo regalis) (wintering only)
Lowland leopard frog (Rana yavapaiensis)
Gila chub (Gila intermedia)
Desert sucker (Catostomus clarki)
Sonora sucker (Catostomus insignis)
Roundtail chub (Gila robusta)

Burro Creek & Francis Creek (Mohave & Yavapai Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)
Arizona cliffrose (Purshia subintegra)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Spotted bat (Euderma maculatum)
California leaf-nosed bat (Macrotus californicus)
Yavapai Arizona pocket mouse (Perognathus amplus amplus)
Hualapai southern pocket gopher (Thomomys umbrinus hualpaiensis)
Ferruginous hawk (Buteo regalis) (wintering only)
Loggerhead shrike (Lanius Iudovicianus)

Desert tortoise (Sonoran population) (Gopherus agassizii)
Chuckwalla (Sauromalus obesus)
Arizona toad (Bufo microscaphus microscaphus)
Rosy boa (Lichanura trivirgata)
Lowland leopard frog (Rana yavapaiensis)
Sonora sucker (Catostomus insignis)
Desert sucker (Catostomus clarki)
Roundtail chub (Gila robusta)

Cienega Creek (Pima County)

Endangered

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae) American peregrine falcon (Falco peregrinus anatum) Gila topminnow (Poeciliopsis occidentalis occidentalis)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 1

Huachuca water umbel (Lilaeopsis schaffneriana ssp. recurva)

Candidate Category 2

Yellow-nosed cotton rat (Sigmodon ochrognathus)
California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Choeronycteris mexicana)
Loggerhead shrike (Lanius ludovicianus)
Ferruginous hawk (Buteo regalis) (wintering only)
Mexican garter snake (Thamnophis eques)
Canyon (giant) spotted whiptail (Cnemodophorus burti)
Chiricahua leopard frog (Rana chiricahuensis)
Lowland leopard frog (Rana yavapaiensis)
Sonoran tiger salamander (Ambystoma tigrinum stebbinsi)
Gila chub (Gila intermedia)

Gila River (Gila Box) (Graham & Greenlee Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)
Razorback sucker (Xyrauchen texanus) with proposed critical habitat

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Threatened

Loach minnow (Tiaroga cobitis) Spikedace (Meda fulgida)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)

Greater western mastiff-bat (Eumops perotis californicus)

Northern gray hawk (Buteo nitidus maximus)

Arizona toad (Bufo microscaphus microscaphus)

Narrow-headed garter snake (Thamnophis rufipunctatus)

Lowland leopard frog (Rana yavapaiensis)

Chiricahua leopard frog (Rana chiricahuensis)

Roundtail chub (Gila robusta)

Sonora sucker (Catostomus insignis)

Desert sucker (Catostomus clarki)

Maricopa tiger beetle (Cicindela oregona maricopa)

Hassayampa River (Maricopa & Yavapai Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Spotted bat (Euderma maculatum)

California leaf-nosed bat (Macrotus californicus)

Greater western mastiff-bat (Eumops perotis californicus)

Yavapai Arizona pocket mouse (Perognathus amplus amplus)

Ferruginous hawk (Buteo regalis) (wintering only)

Loggerhead shrike (Lanius ludovicianus)

Desert tortoise (Sonoran population) (Gopherus agassizii)

Chuckwalla (Sauromalus obesus)

Arizona toad (Bufo microscaphus microscaphus)

Rosy boa (Lichanura trivirgata)

Lowland leopard frog (Rana yavapaiensis)

Hot Springs Canyon (Cochise County)

<u>Endangered</u>

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae) American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)

Mexican long-tongued bat (Choeronycteris mexicana)

Chiricahua western harvest mouse (Reithrodontomys megalotis arizonensis)

Yellow-nosed cotton rat (Sigmodon ochrognathus)

Loggerhead shrike (Lanius ludovicianus)

Ferruginous hawk (Buteo regalis) (wintering only)

Desert tortoise (Sonoran population) (Gopherus agassizii)
Canyon (giant) spotted whiptail (Cnemodophorus burti)
Lowland leopard frog (Rana yavapaiensis)

Middle Gila River (Gila & Pinal Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Threatened

Spikedace (Meda fulgida)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Yavapai Arizona pocket mouse (Perognathus amplus amplus)
Loggerhead shrike (Lanius ludovicianus)
Ferruginous hawk (Buteo regalis) (wintering only)
Chuckwalla (Sauromalus obesus)
Desert tortoise (Sonoran population) (Gopherus agassizii)
Lowland leopard frog (Rana yavapaiensis)
Desert sucker (Catostomus clarki)
Sonora sucker (Catostomus insignis)

Paria River (Coconino County)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)
Humpback chub (Gila cypha)
Razorback sucker (Xyrauchen texanus) with proposed critical habitat at confluence

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Marble Canyon kangaroo rat (Dipodomys microps leucotis)
Loggerhead shrike (Lanius ludovicianus)
Ferruginous hawk (Buteo regalis)
Chuckwalla (Sauromalus obesus)
Flannelmouth sucker (Catostomus latipinnis)

San Pedro River (Cochise County)

Endangered

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)
American peregrine falcon (Falco peregrinus anatum)
Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 1

Huachuca water umbel (Lilaeopsis schaffneriana ssp. recurva)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Choeronycteris mexicana)
Southwestern cave bat (Myotis velifer brevis)
Chiricahua western harvest mouse (Reithrodontomys megalotis arizonensis)
Yellow-nosed cotton rat (Sigmodon ochrognathus)
Loggerhead shrike (Lanius ludovicianus)
Ferruginous hawk (Buteo regalis) (wintering only)
Northern gray hawk (Buteo nitidus maximus)
Desert tortoise (Sonoran population) (Gopherus agassizii)
Texas horned lizard (Phrynosoma cornatum)
Canyon (glant) spotted whiptail (Cnemodophorus burti)
Mexican garter snake (Thamnophis eques)

Santa Maria River (Mohave, La Paz, Yavapai Counties)

Endangered

American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 2

Spotted bat (Euderma maculatum)

Desert sucker (Catostomus clarki)

California leaf-nosed bat (Macrotus californicus)

Hualapai southern pocket gopher (Thomomys umbrinus hualpaiensis)

Yavapai Arizona pocket mouse (Perognathus amplus amplus)

Ferruginous hawk (Buteo regalis) (wintering only)

Loggerhead shrike (Lanius ludovicianus)

Desert tortoise (Sonoran population) (Gopherus agassizii)

Chuckwalla (Sauromalus obesus)

Arizona toad (Bufo microscaphus microscaphus)

Rosy boa (Lichanura trivirgata)

Lowland leopard frog (Rana yavapaiensis)

Sonora sucker (Catostomus insignis)

Desert sucker (Catostomus clarki)

Roundtail chub (Gila robusta)

Swamp Springs Canyon (Graham County)

Endangered

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae) American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Ghoeronycteris mexicana)
Loggerhead shrike (Lanius ludovicianus)
Apache northern goshawk (Accipiter gentilis apache)
Desert tortoise (Sonoran population) (Gopherus agassizii)
Lowland leopard frog (Rana yavapaiensis)
Gila chub (Gila intermedia)
Sonora sucker (Catostomus insignis)
Desert sucker (Catostomus clarki)

Turkey Creek (Graham County)

Endangered

Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae) American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

<u>Threatened</u>

Loach minnow (Tiaroga cobitis)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Candidate Category 1

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)
Loggerhead shrike (Lanius ludovicianus)
Lowland leopard frog (Rana yavapaiensis)
Roundtail chub (Gila robusta)
Dosert sucker (Catostomus clarki)

Desert sucker (Catostomus clarki) Sonora sucker (Catostomus insignis)

Virgin River (Mohave County)

Endangered

American peregrine falcon (Falco peregrinus anatum)
Woundfin (Plagopterus argentissimus)
Virgin River chub (Gila seminuda)

Threatened

Desert tortoise (Mojave population) (Gopherus agassizii)

Candidate Category 2

Spotted bat (Euderma maculatum)

California leaf-nosed bat (Macrotus californicus)

Ferruginous hawk (Buteo regalis)

Loggerhead shrike (Lanius ludovicianus)

Chuckwalla (Sauromalus obesus)

Arizona toad (Bufo microscaphus microscaphus)

Lowland leopard frog (Rana yavapaiensis)

Roundtail chub (Gila robusta)

Flannelmouth sucker (Gatostomus latipinnis)

Desert sucker (Catostomus clarki)

Virgin spinedace (Lepidomeda mollispinis mollispinis)

Virgin thistle (Girsium virginensis)

Wright Creek (Mohave County)

Endangered

American peregrine falcon (Falco peregrinus anatum) Bald eagle (Haliaeetus leucocephalus)

Candidate Category 2

Hualapai southern pocket gopher (Thomomys umbrinus hualpaiensis)

Northern goshawk (Accipiter gentilis)

Loggerhead shrike (Lanius ludovicianus)

Ferruginous hawk (Buteo regalis)

Chuckwalla (Sauromalus obesus)

Lower San Francisco River (Greenlee County)

Note: A map for this area was not enclosed. This list is for the river within the following area: Townships 2,3,4,5 South, Ranges 29, 30, 31, 32 East.

Endangered

American peregrine falcon (Falco peregrinus anatum)

Bald eagle (Haliaeetus leucocephalus)

Proposed Endangered

Southwestern willow flycatcher (Empidonax traillii extimus)

Threatened

Loach minnow (Tiaroga cobitis)

Candidate Category 2

California leaf-nosed bat (Macrotus californicus)

Apache northern goshawk (Accipiter gentilis apache)

Loggerhead shrike (Lanius ludovicianus)

California leaf-nosed bat (Macrotus californicus)

Arizona toad (Bufo microscaphus microscaphus)

Chiricahua leopard frog (Rana chiricahuensis)

Lowland leopard frog (Rana yavapaiensis)

Sonora sucker (Catostomus insignis)

Desert sucker (Catostomus clarki)

Endangered and threatened species are protected by Federal law and must be considered prior to project development. Candidate species are those which the Fish and Wildlife Service (Service) is considering adding to the threatened or endangered species list. Category 1 candidates are those for which the Service has enough information to support a proposal to list. Category 2 species are those for which the Service presently has insufficient information to support a proposal to list. Although candidate species have no legal protection under the Endangered Species Act, they should be considered in the planning process in the event they become listed or proposed for listing prior to project completion.

The State of Arizona protects some species not protected by Federal law. We suggest you contact the Arizona Game and Fish Department and the Arizona Department of Agriculture for state-listed or sensitive species in these areas.

In future communications on this project, please refer to consultation number 2-21-94-I-082. If we may be of further assistance, please contact Brenda Andrews or Tom Gatz.

Sincerely,
Son F Spiller

Sam F. Spiller State Supervisor

cc: Director, Arizona Game and Fish Department, Phoenix, Arizona Plant Program Manager, Arizona Department of Agriculture, Phoenix, Arizona