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**Bureau of Land Management**

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***Coyote Mountains Land Acquisition***  
***AZA-037474***

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# 1 INTRODUCTION

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## 1.1 Background

The Bureau of Land Management (BLM), Tucson Field Office, is proposing to acquire 477 acres of private lands adjacent to the Coyote Mountains Wilderness through the purchase authority granted by Section 205 of the Federal Land Policy and Management Act of October 21, 1976, as amended (FLPMA) and the Land and Water Conservation Fund Act of 1965, as amended (LWCF). This case has been serialized in the BLM lands recordation system as AZA-037474. The lands are in Pima County, Arizona, approximately 37 miles southwest of Tucson, Arizona. This Environmental Assessment (EA) has been prepared for compliance with the National Environmental Policy Act (NEPA), and other relevant Federal and State laws and regulations, to determine potential environmental consequences associated with purchasing land for management under the Phoenix Resource Management Plan (Phoenix RMP).

This project rose to priority after Secretary Zinke signed Secretarial Order Number 3356 on September 15, 2017. This Secretarial Order directs Department of the Interior agencies, including the BLM, to assess ongoing efforts and develop new opportunities to “enhance and expand public access to lands and waters administered by the Department—lands and waters owned by all Americans—for hunting, fishing, recreational shooting, and other forms of outdoor recreation.”

## 1.2 Purpose and Need for Action

The BLM, Tucson Field Office, proposes to acquire 477 acres of private land adjacent to the Coyote Mountains Wilderness with funding secured from the LWCF.

In accordance with FLPMA (Section 103(c)), public lands are to be managed for multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources. The Secretary of the Interior is authorized to acquire non-federal lands as long as the acquisition is consistent with the mission and with applicable departmental land use plans (Section 205 (b)).

The Coyote Mountains Wilderness and surrounding public lands are managed by the Tucson Field Office under the Phoenix RMP, published 1988. The parcels proposed for acquisition fall within a designated resource conservation area (RCA). The Phoenix RMP directs the BLM to consolidate ownership within RCAs. The Phoenix RMP also identifies the need to provide administrative and public access to the area that became the Coyote Mountains Wilderness.

On November 28, 1990, Congress designated the Coyote Mountains Wilderness with the passage of the Arizona Desert Wilderness Act of 1990. In October, 2012, the Tucson Field Office completed the Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan. This plan provides management objectives and actions for protecting and enhancing wilderness resources for a period of 10 years. The Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan identifies a lack of legal access to the Coyote Mountains Wilderness and sets an objective of securing up to two legal public access routes into it.

The purpose of the proposed action is to improve access to the Coyote Mountains Wilderness. The need for the proposed action is to respond to the direction provided for in the Phoenix RMP, and the Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan.

## 1.3 Decision to Be Made

The BLM Tucson Field Office Manager is the authorized officer responsible for the decision regarding the acquisition of private land. Based on the results of the NEPA analysis, the authorized officer will determine whether the impacts of the Proposed Action described in the analysis are significant and would require preparation of an environmental impact statement (EIS). If the authorized officer determines that

the impacts are not significant, this analysis will help inform the decision to approve the acquisition of the private lands with appropriate mitigation measures, or whether to reject it.

## **1.4 Conformance with Applicable Land Use Plan(s)**

The Proposed Action is in conformance with the 1988 Phoenix RMP and Record of Decision. The Phoenix RMP directs the authorized officer to consolidate public land ownership and intensively manage lands in seven RCAs and to consider acquisition of private lands in the seven RCAs on a case by case basis (Page 18).

## **1.5 Relationship to Statutes, Regulations or Other Plans**

The LWCF Act of 1965 was established by Congress to conserve land and wetlands for future generations. The Act designates up to \$900 million annually from a portion of the royalties from offshore oil and gas leases to be deposited into the U.S. Treasury. Congress appropriates the funds for federal, state and local conservation, as well as for the protection of our national treasures. BLM LWCF acquisitions are authorized by the Federal Land Policy and Management Act of 1976 (FLPMA, 43 USC 1715), as amended. FLPMA Section 205(a) provides authority for the Secretary of the Interior to acquire lands or interests therein by purchase, exchange, donation or eminent domain, and Section 205(b) further requires an acquisition be consistent with the mission of the department and applicable land use plans.

The proposed action conforms to 43 CFR Part 2100 which requires BLM to evaluate land proposed for acquisition on a case-by-case basis. Acquisition of private lands would be consistent with the following other laws, treaties, and executive orders; regulations; and policies, plans, and protocols; including, but not limited to:

### **Laws, Treaties and Executive Orders:**

- National Historic Preservation Act of 1966, as amended (NHPA)
- National Environmental Policy Act of 1969 (42 U.S.C. 4321, 4331-4335, and 4341-4347) which have the same objective as that given in the BLM Regulations (NEPA)
- Endangered Species Act of 1973
- Federal Land Management and Policy Act of 1976, as amended (FLPMA)

### **Regulations, Policies, Plans and Protocols:**

- Department of the Interior (DOI), Departmental Manual, Part 600: Public Land Policy, Chapter 5: Standards For Federal Lands Boundary Evidence
- Department of the Interior (DOI), Departmental Manual, Part 602: Land Acquisition, Exchange, and Disposal
- BLM Handbook H-2000-1: Pre-Acquisition Environmental Site Assessments
- BLM Handbook H-2100-1: Acquisition
- Secretarial Order Number 3356

## **1.6 Scoping and Public Involvement**

The NEPA regulations (40 CFR 1500-1508) require that the BLM use a scoping process to identify potential significant issues for analysis in the EA. The principal goals of scoping are to identify issues, concerns, and potential impacts that require detailed analysis.

The BLM identified site-specific resource concerns through the preliminary review process conducted during internal scoping. The internal scoping meeting was held on June 1, 2018.

On June 22, 2018, a draft of chapters 1 and 2 of the EA were published on the BLM ePlanning website. On June 25, 2018, the TFO mailed scoping notice letters with a link to the ePlanning website to 84

parties. The letters identified a deadline of July 13, 2018 by which all comments must be submitted. The TFO received a total of 27 substantive comments from six different parties. A response was provided for each comment. To view the comments and responses, please see Appendix A.

## **1.7 Issues**

### **1.7.1 Issues Considered, but eliminated from Detailed Analysis**

The BLM considered a wide range of potential issues of concern for the Proposed Action. The BLM focuses its analysis on issues that are significant to the action in question, rather than analyzing potential impacts to resources that are clearly not significant.

“Significant” as used in NEPA requires considerations of both context and intensity. The significance of an action must be analyzed in several contexts such as society as a whole, the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. Intensity of an action refers to the severity of impact. (40 CFR §1508.27)

Issues were eliminated from analysis because the BLM determined them to not be present or not to be significantly impacted by this project. Issues considered but not analyzed in further detail are listed below:

#### **How would the proposed land acquisition affect existing vegetation located on the acquisition parcels?**

Rationale for elimination: *If the proposed land is acquired, there would be no significant impact to existing vegetation. There are no plans to develop the property, so there would not be any ground disturbing activity that would affect the vegetation on the site.*

#### **How would the proposed land acquisition affect lands with wilderness characteristics on the acquisition parcels?**

Rationale for elimination: *The acquisition parcels may have wilderness characteristics that could contribute to existing wilderness values in the area. An inventory will be completed if the parcel is acquired.*

#### **How would the proposed land acquisition affect local residents especially with regard to road maintenance?**

Rationale for elimination: *The impact to the tax revenue in the Hayhook Ranch Road Improvement District is minimal (about \$1,758) which would be spread among the other 130+ parcels in the District. Pima County is not concerned about the potential acquisition in this regard.*

#### **How would the proposed land acquisition affect lands and realty management on the acquisition parcels?**

Rationale for elimination: *If the proposed land is acquired, new realty authorizations would be considered on a case-by-case basis, according to the Phoenix RMP. No new lands and realty authorizations are considered at this time.*

#### **How would the proposed land acquisition affect mineral resources on the acquisition parcel?**

Rationale for elimination: *If the proposed land is acquired, no changes would occur in the management of the mineral estate, as the subsurface estate is already federal.*

#### **How would the proposed land acquisition affect water resources on the acquisition parcel?**

Rationale for elimination: *There would be no changes to the current conditions of water quality on the parcels. The proposed action would not impact water quality for surface water or ground water. There are no plans to develop the property.*



## **1.7.2 Issues Identified**

The issues carried forward through analysis in this EA have a relationship with the proposed action; are within the scope of analysis; and are amenable to scientific analysis. The issues identified to be carried forward for analysis are listed below:

### **Recreation and Access**

**Issue 1:** How would the proposed land acquisition affect access and visitation into the Coyote Mountains Wilderness?

**Issue 2:** How would the proposed land acquisition affect recreation opportunities, settings, experiences, and recreation management within the Coyote Mountains Wilderness?

### **Visual Resources**

**Issue 3:** How would the proposed land acquisition affect the visual resources in the Coyote Mountains Wilderness and visual resource management?

### **Cultural Resources**

**Issue 4:** How would the proposed land acquisition affect cultural resources that may be present on the parcels?

### **Tribal Resources**

**Issue 5:** How would the proposed land acquisition affect local tribes?

### **Wildlife, Habitat, Special Status Species**

**Issue 6:** How would the proposed land acquisition affect wildlife, habitats, and special status species in the area?

### **Range Management**

**Issue 7:** How would the proposed land acquisition affect grazing allotments and practices on the parcels?

## 2 PROPOSED ACTION AND ALTERNATIVE(S)

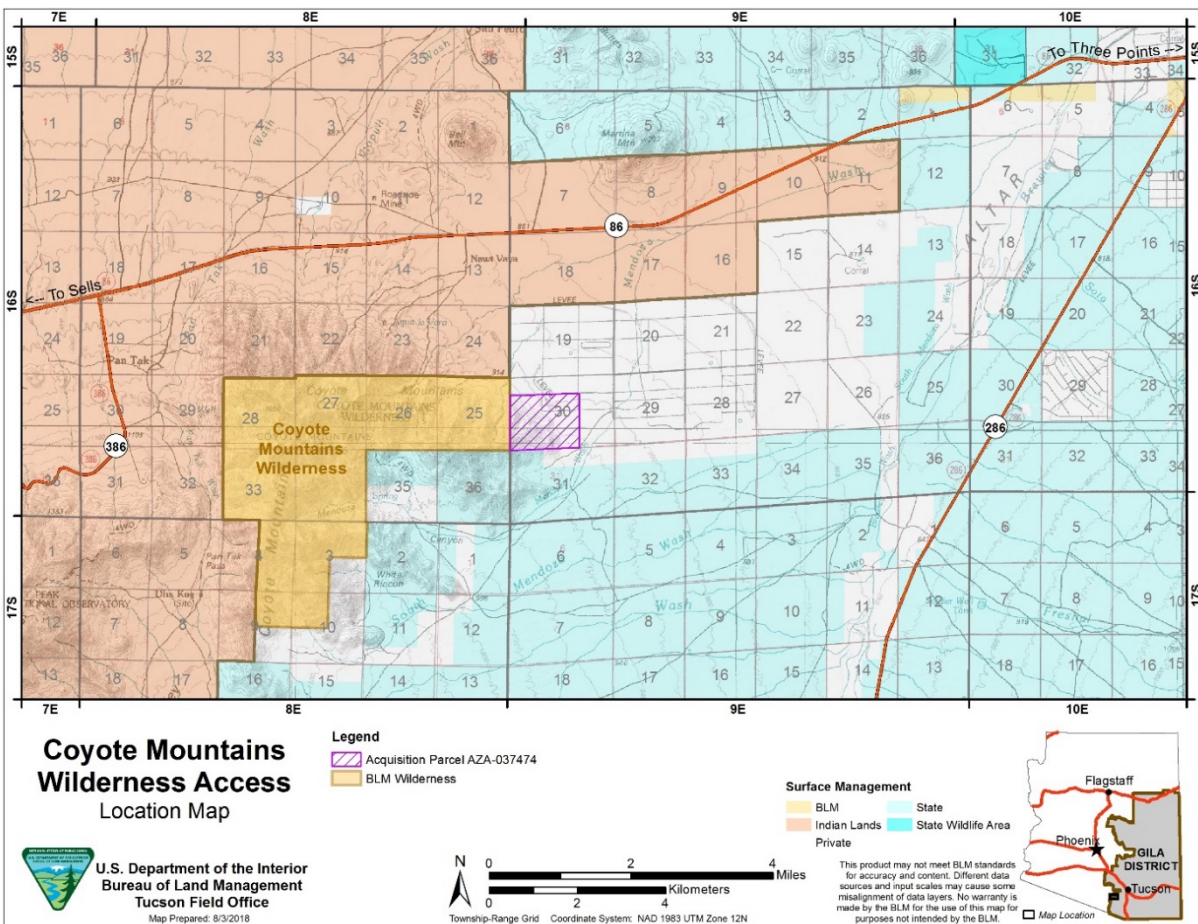
### 2.1 Proposed Action

Using LWCF funding, the BLM is proposing to execute a fee purchase acquisition of a block of six contiguous, privately owned parcels of land, totaling 477 acres, from a willing land owner. The parcels are for sale by Rebuild America, Inc. The Tucson Field Office secured funding for the full purchase price from the LWCF on October 20, 2017 to purchase the parcels. The land is adjacent to the northeastern boundary of the Coyote Mountains Wilderness area in Pima County, AZ (see Map A). If acquired, the land would not be designated as wilderness, but managed under the Phoenix RMP. Acquisition of the land will provide improved legal access and a buffer to the Coyote Mountains Wilderness.

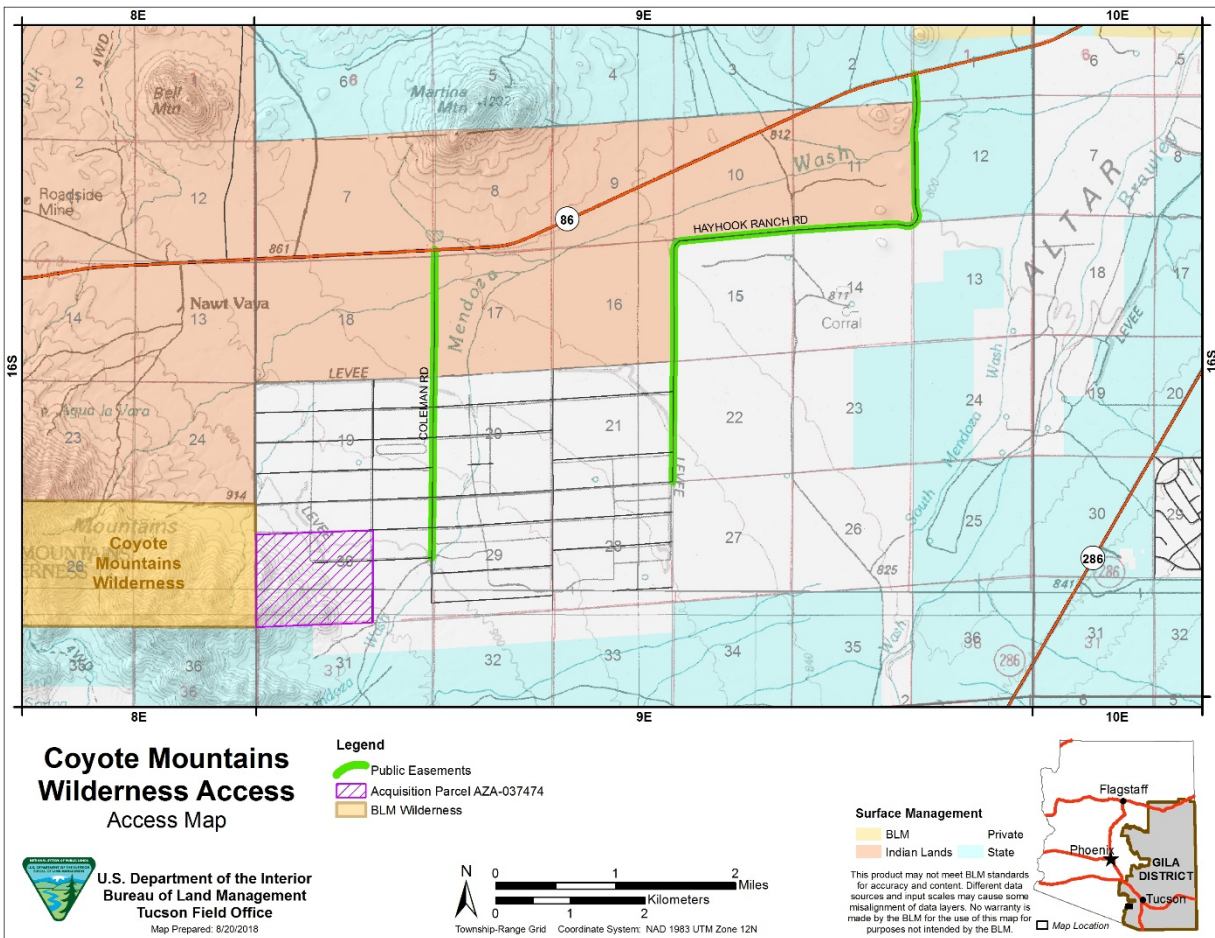
The legal description of the land proposed for acquisition is as follows:

Gila and Salt River Meridian, AZ  
 T. 16 S., R. 9 E.,  
 sec. 30, lots 5 thru 16.

#### 2.1.1 Map A: Parcel Location



## 2.1.2 Map B: Access Routes



## 2.2 No Action

Under this alternative, the BLM would not acquire the fee land or interest in the described properties. They would remain in private ownership and future uses of the property would be governed by the laws, regulations, and ordinances of the State of Arizona and Pima County.

New private development could also become permissible under planning and building ordinances of the local governments on the proposed acquisition parcels that would remain in private ownership. Over time, it is possible that there would be impacts to not only the private lands but also to the adjacent Coyote Mountains Wilderness.

## **3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

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### **3.1 Recreation and Access**

**Issue 1:** How would the proposed land acquisition affect access and visitation into the Coyote Mountains Wilderness?

**Issue 2:** How would the proposed land acquisition affect recreation opportunities, settings, experiences, and recreation management within the Coyote Mountains Wilderness?

#### ***3.1.1 Affected Environment***

At this time, legal public access to the Coyote Mountains Wilderness has not been obtained. BLM currently advises visitors to obtain permission in advance from adjacent private landowners or other state and federal agencies (Arizona State Land Department, Tohono O’odham Nation, Arizona Game and Fish Department Hunter Access program, Buenos Aires National Wildlife Refuge).

Legal public access via Pima County easements approaches the Coyote Mountains Wilderness, but does not continue all the way to the Coyote Mountains Wilderness boundary. Pima County has easements from Ajo Highway along Hayhook Ranch Road and Coleman Road. Acquisition of the proposed land would help diminish the gap between the County easements and BLM land (see Map B). The BLM plans to pursue public legal access with future acquisitions of land and/or easements.

Access into the Coyote Mountains Wilderness will occur along existing roads starting from the County easements, continuing through the Hayhook subdivision, and onto the land proposed for acquisition. The existing routes on the acquisition parcels are Bush Road and Shirley Lane. After leaving Ajo Highway, all subsequent roads are primarily dirt roads with minimal improvement. No creation of new routes is proposed at this time.

Outstanding recreational opportunities are available in the Coyote Mountains Wilderness. Visitors can engage in a variety of dispersed recreational activities, including hiking/walking, horseback riding, wildlife viewing, sightseeing, and photography. These same activities in the Coyote Mountains Wilderness can be experienced in the proposed acquisition parcels. BLM recreation staff conduct annual site visits to the Coyote Mountains Wilderness to monitor site conditions.

#### ***3.1.2 Impacts from the No Action Alternative***

##### **Direct and Indirect Impacts**

Under the No Action Alternative, the private land inholding would continue to be legally unavailable for public recreational use, and legal access on existing routes across the acquisition parcel would not be obtained.

##### **Cumulative Impacts**

Under the No Action Alternative, the parcel may be acquired by private developers. New private development would be permissible under planning and building ordinances of the local governments. Over time, it is possible that there would be impacts not only to the private lands, but to access into the Coyote Mountains Wilderness. This may include the creation of user routes from private land onto the Coyote Mountains Wilderness boundary or blockage of the limited access currently being utilized.

### **3.1.3 Impacts from the Proposed Action**

#### **Direct and Indirect Impacts**

The acquisition lands would be available for recreation use to the public throughout the year similar to the Coyote Mountains Wilderness. The bulk of use is anticipated to occur in the fall, winter, and early spring due to cooler climates. Low recreation use is anticipated late spring and into the summer due to the extreme heat. The acquired parcels would provide areas of public land for the same recreation activities experienced in the Coyote Mountains Wilderness. The acquisition of the proposed parcels will not alter the setting or the recreational opportunities available, but will add to the land base available for recreational use.

No new travel routes will be created. The legal status of the access will be improved, but no changes to current conditions on the ground will occur. The Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan prohibits group sizes of more than 10 people. It also limits stock animals to 6 per group per visit. Monitoring visits would continue in both the Coyote Mountains Wilderness and the acquisition land bordering the Coyote Mountains Wilderness.

Vehicular travel would be limited to existing roads to prevent surface disturbance. Shirley Lane and Bush Road would be included in the BLM roads system and given a motorized route number for mapping and road maintenance. Pima County currently maintains Hayhook Ranch Road on a regular 12-week schedule. The BLM will work with Pima County if increased road maintenance is required as a result of this acquisition. This acquisition should not lead to road maintenance burdens for the subdivision residents.

#### **Cumulative Impacts**

Under the Proposed Action, the legal public access to the Coyote Mountains Wilderness will be improved. This would reduce potential trespassing currently occurring on private lands adjacent to the Coyote Mountains Wilderness. Annual visitation is expected to remain the same. The Tucson Field Office recreation program would be responsible for managing visitor use on the acquired land. This may include future plans to designate a parking area on the parcels and install educational signs for visitors. The acquisition would allow for a future opportunity to create a designated trail system for foot-based access into the Coyote Mountains Wilderness. A designated system will reduce the potential for user-created routes inside the parcels. BLM personnel would be assigned to monitor and patrol the acquired parcels to ensure that visitation is managed as directed by the Baboquivari Peak Wilderness and Coyote Mountains Wilderness plan.

## **3.2 Visual Resources**

**Issue 3:** How would the proposed land acquisition affect the visual resources in the Coyote Mountains Wilderness and visual resource management?

### **3.2.1 Affected Environment**

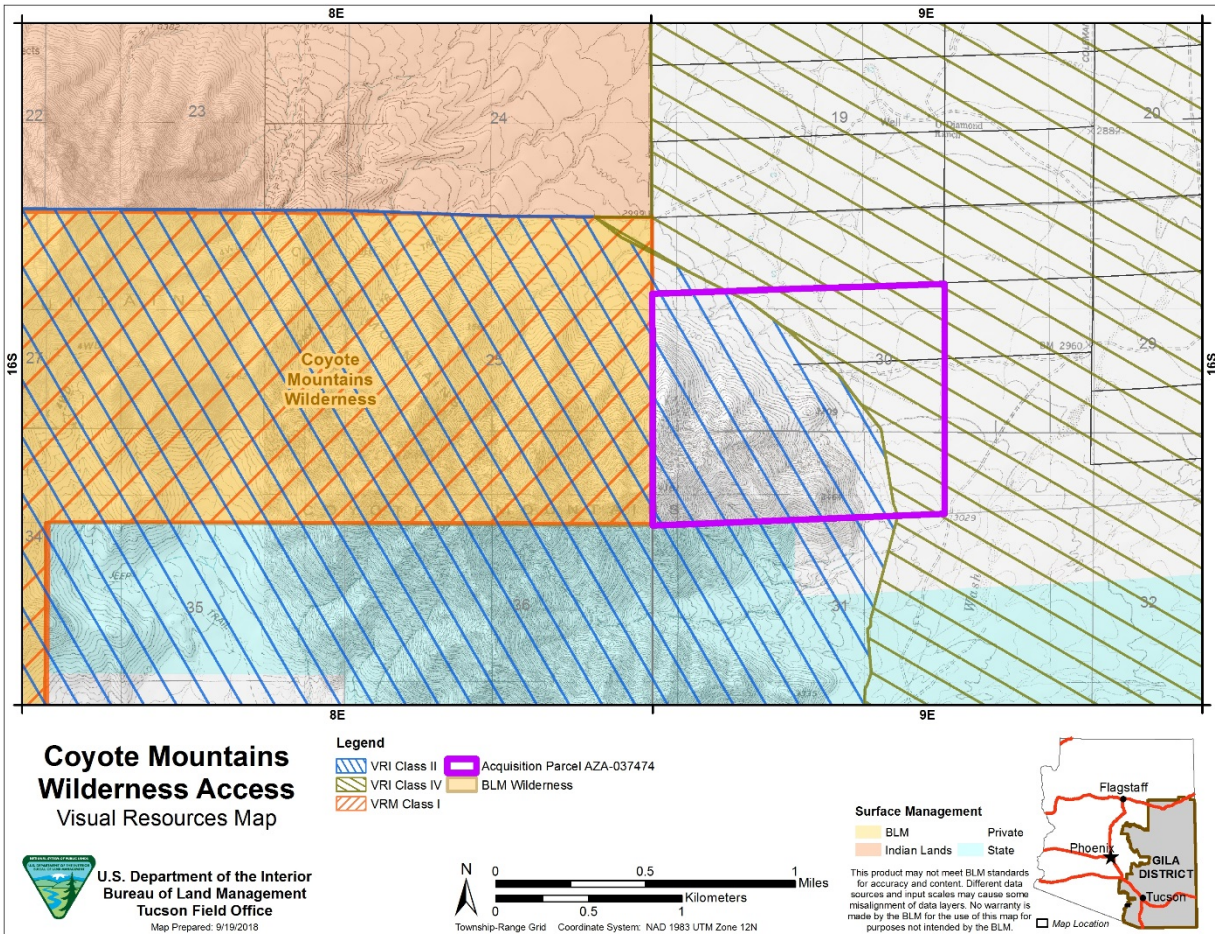
The proposed acquisition parcels are within close proximity to the Coyote Mountain Wilderness, which is categorized as Visual Resource Management (VRM) class I, as mandated by BLM policy for all wilderness areas. The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes and some limited management activity.

The proposed acquisition parcels do not have a VRM class assigned. The parcels are designated as a mixture of VRI class II and class IV (see Map C). For reference, VRI class I lands have the greatest relative visual value, and VRI class IV lands have the lowest relative visual value.



The proposed acquisition parcels are primarily visible from on-site access routes. Impacts to the visual quality of lands surrounding the parcel are limited to local views, and do not affect overall scenic quality. The proposed acquisition parcels are largely in natural condition, with existing residential roads and a few routes that run along the base of the mountain. The parcel is visible from existing residences on adjacent private lands.

### 3.2.1.1 Map C: Visual Resources



### 3.2.2 Impacts from the No Action Alternative

#### Direct and Indirect Impacts

Under the No Action Alternative, visual resources would remain unchanged. The 477 acres of land would not be added to the VRM classes.

#### Cumulative Impacts

Under the No Action Alternative, if the lands were to be developed, there may be potential for private housing development to occur in the parcel. Since the land would not be managed by the BLM, it may be developed with an unlimited amount of infrastructure. This has potential to degrade VRM designations within the Coyote Mountains Wilderness, as the infrastructure would likely be visible from the Coyote Mountains Wilderness.

### **3.2.3 Impacts from the Proposed Action**

#### **Direct and Indirect Impacts**

Of the 477 acres proposed for acquisition, 313 acres near the Coyote Mountains Wilderness boundary are identified as VRI class II. These 313 acres would be managed under an interim VRM class II. This VRM class would direct the BLM to retain the existing character of the landscape and maintain a low level of change to the landscape. The remaining 164 acres of the acquisition parcels are identified as VRI class IV. These 164 acres would be managed under an interim VRM class IV. This VRM class would provide for management activities that require major modifications of the existing character of the landscape. The level of change to the characteristic can be higher.

#### **Cumulative Impacts**

Under the Proposed Action, the BLM would be able to manage the visual resources on the acquired lands. Areas of the acquisition lands closest to the Coyote Mountains Wilderness boundary would be required to retain the existing characteristics of the landscape, resulting in limited development. The acquisition parcels would help preserve visual resources on highly visible, scenic mountain slopes. The remaining acres of the parcel may be managed for visitor use. This may include future improvements such as a visitor parking area and trailhead development.

## **3.3 Cultural Resources**

**Issue 4:** How would the proposed land acquisition affect cultural resources that may be present on the parcels?

### **3.3.1 Affected Environment**

The lands proposed for acquisition are located within a quarter mile of the Tohono O'odham Indian Reservation. There is potential for cultural resource sites to be located on or in close proximity to the acquisition parcels or on Tribal land near the acquisition parcels. No archaeological surveys, past or present, have been recorded for this area.

### **3.3.2 Impacts from the No Action Alternative**

#### **Direct and Indirect Impacts**

Under the No Action Alternative, the 477 acres would remain private property and would continue to be protected only by state laws pertaining to burials and burial-related artifacts on private lands. Currently no known cultural resource sites within these lands are being monitored against vandalism, destruction or looting of artifacts and there is little chance that additional sites would be identified, documented, protected and added to the archaeological record, under current conditions.

#### **Cumulative Impacts**

If the lands were to be developed, it is possible that unknown cultural resource sites would be destroyed by construction activities. Arizona does not require cultural clearance for construction on private lands, unless federal funding or specific state and municipal funding is used, or if the construction falls within cities that have enacted laws pertaining to the protection of cultural resources.

### **3.3.3 Impacts from the Proposed Action**

#### **Direct and Indirect Impacts**

Under the Proposed Action, the 477 acres would become protected under federal laws; including the Archaeological Resources and Protection Act of 1979, which allows for federal prosecution for destruction and/or theft of cultural resources, not just burials or burial related artifacts. If acquired, cultural resource sites currently located on the private property would gain protection under Section 106 of the National Historic Preservation Act. Any cultural resources that may be found within these areas would not be in danger of destruction by private development.

#### **Cumulative Impacts**

Bringing this land, and any potential existing cultural resources, under federal protection may lead to an enhanced understanding of the cultural history of the surrounding area.

## **3.4 Tribal Resources**

**Issue 5:** How would the proposed land acquisition affect local tribes?

### **3.4.1 Affected Environment**

The lands proposed for acquisition are located within a quarter mile of the Tohono O'odham Indian Reservation.

### **3.4.2 Impacts from the No Action**

#### **Direct and Indirect Impacts**

Under the No Action Alternative, the 477 acres would remain privately owned. There would be no guarantee of access to the lands for any local tribes. Private land owners are not required to consult with local tribes regarding any future developments. Any concerns held by the tribes regarding these parcels would likely not be taken into consideration by private land owners.

#### **Cumulative Impacts**

Tribes may have no recourse to voice concerns in the face of private development. Any resources important to Tribal history and identity may be lost or damaged without documentation.

### **3.4.3 Impacts from the Proposed Action**

#### **Direct and Indirect Impacts**

Under the Proposed Action, the 477 acres would become public land and open to any member of the public, including tribal members. The BLM would consult with interested tribes regarding any future proposed developments on the property. The BLM would address any concerns the tribes may have regarding management of the land in the future.

#### **Cumulative Impacts**

Tribal history and identity in the region would receive wider consideration and respect.

## **3.5 Wildlife, Habitat, and Special Status Species**

**Issue 6:** How would the proposed land acquisition affect wildlife, habitats, and special status species in the area?



### **3.5.1 Affected Environment**

The Coyote Mountains Wilderness and proposed acquisition parcels provide diverse desert habitats, such as Saguaro-Palo Verde-Fairy Duster and Palo Verde-Mesquite-bursage, which are important seasonally and yearlong for a variety of game, nongame, and special status wildlife species. The analysis area includes species-specific preferred habitats (e.g., classic Sonoran Desert upland habitat). The area includes terrestrial habitat within the proposed acquisition parcels and adjacent BLM lands within the Wilderness. The primary issue is how the future management of the acquired parcels would affect wildlife species and special status species and their habitats.

There is a wide diversity of game and nongame wildlife species, including migratory birds, typically found in the Sonoran Desert. Examples are mule deer and javelina, which may occur in the area. Palo Verde-Mesquite-bursage habitat is associated with more than 674 species, including 64 mammalian and 80 bird species (IFNM RMP USDI BLM 2013). These species are typical of Sonoran desert scrub habitats in southern Arizona.

### **3.5.2 Impacts from the No Action**

#### **Direct and Indirect Impacts**

Under the no action alternative, BLM would not acquire the 477 acres of habitat in 2018, and would not have the opportunity to improve the condition of habitat for wildlife and species. The proposed acquisition parcels would not be available for BLM habitat monitoring and protection. The 477 acres of habitat would continue to not be protected under federal laws including the Endangered Species Act.

#### **Cumulative Impacts**

The parcels may be developed under private ownership, which would lead to destruction of habitat and potential loss of individual plants and animals.

### **3.5.3 Impacts from the Proposed Action**

#### **Direct and Indirect Impacts**

Acquiring the proposed parcels in 2018 would increase habitat managed by the BLM by 477 acres by 2020, and thereby provide the BLM the opportunity on those acres to engage in wildlife habitat conservation and wildlife species. The 477 acres would be subject to BLM habitat monitoring and protection under federal laws.

#### **Cumulative Impacts**

Through monitoring and habitat management, the acquired land would remain to be valuable habitat for a number of species native to Sonoran desert scrub habitats in southern Arizona. Potential wildlife and habitat on the acquired land would become protected under federal laws, including the Endangered Species Act.

## **3.6 Range Management**

**Issue 7:** How would the proposed land acquisition affect grazing allotments and practices on the parcels?

### **3.6.1 Affected Environment**

There is no grazing allotment designated on the proposed acquisition parcels. However, the Hayhook Allotment is adjacent to the parcels along the western boundary (see Map D).

The proposed acquisition parcels contain two ecological sites:

- Sandy Loamy Upland (deep) 10-13" p.z.

- Shallow Hills 10-13" p.z.

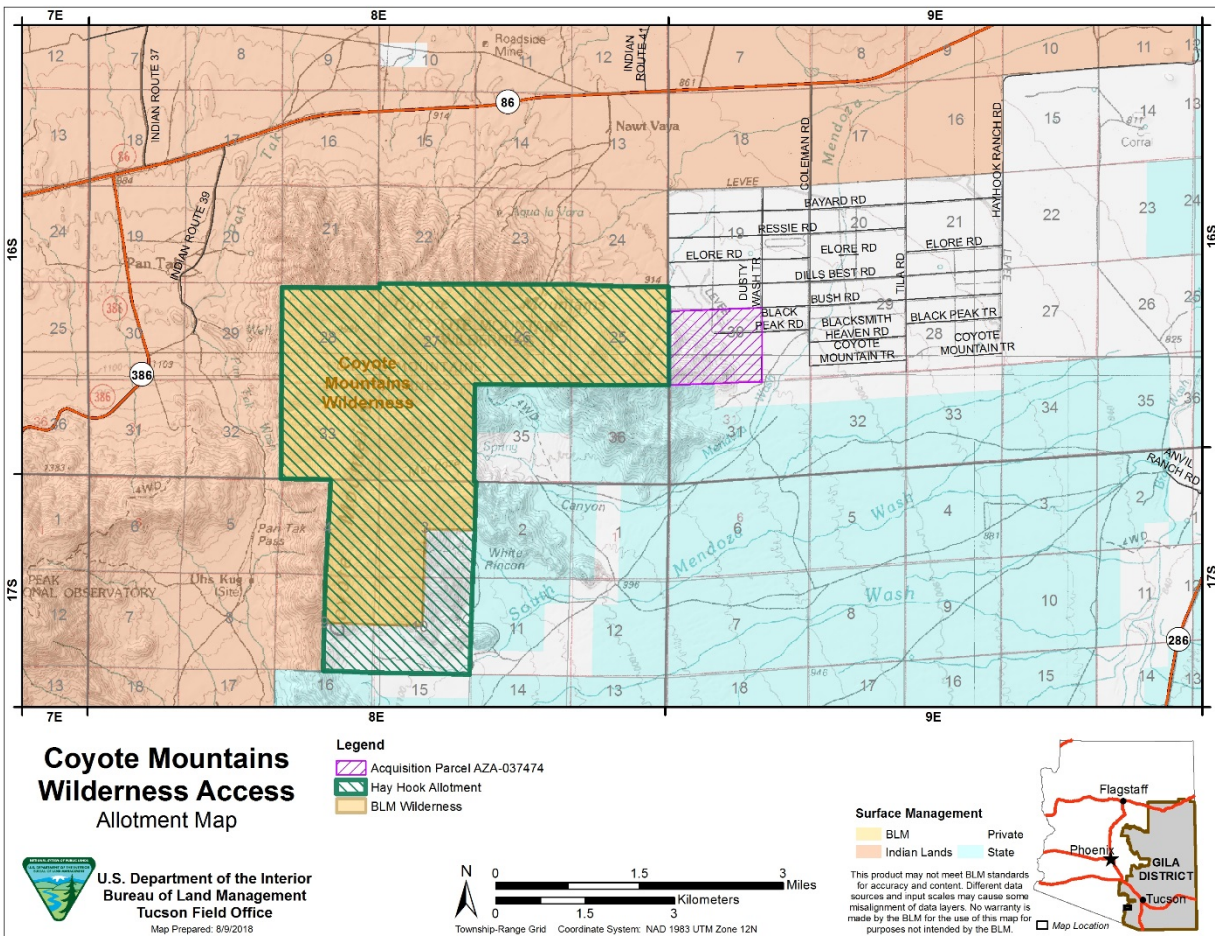
Ecological sites are designated based on a land classification system that describes ecological potential and ecosystem dynamics of land areas. The descriptions are based on soils, vegetation and hydrologic processes. Ecological sites are used to stratify the landscape and organize ecological information for purposes of monitoring, assessment, and management (USDA NRCS 2014).

Ground cover as it relates to soil stability is one of the ecologic factors quantified in ecological site descriptions. The ground cover existing on the proposed acquisition parcels can be described as follows:

<b>Soil Surface Cover (%)</b>									
<i>Ecological Site Name</i>	<i>Grasses</i>	<i>Forbs</i>	<i>Shrubs</i>	<i>Trees</i>	<i>Biological Crust</i>	<i>Litter</i>	<i>Surface Fragments &gt;1/4" &lt;3"</i>	<i>Surface Fragments &gt;3"</i>	<i>Bare Ground</i>
Sandy Loam Upland Deep 10-13" p.z.	1 to 6	0 to 1	1 to 4	0 to 1	1 to 10	10 to 80	0 to 40	0 to 5	10 to 85
Shallow Hills 10-13" p.z.	0 to 1	0 to 1	1 to 5	1 to 1	0 to 5	5 to 60	30 to 60	5 to 25	5 to 25

Other factors quantified in ecological site descriptions include forage production by plant class, plant species diversity, climatic factors and soil characteristics.

### 3.6.1.1 Map D: Allotments



### 3.6.2 Impacts from the No Action

#### Direct and Indirect Impacts

Under the No Action Alternative, the acquisition parcels would remain in private ownership and would not be subject to the BLM's Arizona Standards for Rangeland Health, approved April 28, 1997. The land would not be added to the Hayhook Allotment.

#### Cumulative Impacts

Under private ownership, grazing would not occur on the land.

### 3.6.3 Impacts from the Proposed Action

#### Direct and Indirect Impacts

The proposed acquisition parcels are adjacent to the Hayhook Allotment, however, upon acquisition, BLM would not allow grazing on the acquired lands, in accordance with the Record of Decision for the Phoenix District Portion of the Eastern Arizona Grazing Environmental Impact Statement and Rangeland Program, September 1987. The decision states that land that is presently unleased for livestock use would remain unleased, with vegetation reserved for wildlife and non-consumptive use.

No other changes are proposed, so existing desert upland vegetation ecological conditions and trends would be expected to continue in the short term on the proposed acquisition parcels.

## **Cumulative Impacts**

Grazing would not be expanded in the area. The land would begin to be monitored by the BLM and managed for optimal soil, vegetative, and hydrologic health, and reserved for wildlife and non-consumptive use.

## 4 SUPPORTING INFORMATION

### 4.1 Tribes, Individuals, Organizations, or Agencies Consulted

On June 21, 2018, consultation letters were mailed to the following parties:

Name	Title	Affiliation
Peter Steere	Tribal Historic Preservation Officer	Tohono O'odham Nation
Barnaby Lewis	Tribal Historic Preservation Officer	Gila River Indian Community
Edward Manuel	Chairman	Tohono O'odham Nation
Larry Benallie, Jr.	Cultural Specialist	Gila River Indian Community
Delbert Ray, Sr.	President	Salt River Pima Maricopa Indian Community
Shane Anton	Cultural Resource Manager	Salt River Pima Maricopa Indian Community
Caroline Anton	Cultural Resource Manager	Ak-Chin Indian Community

See Appendix A for comments submitted and responses provided.

### 4.2 List of Preparers

Name	Title
Maggie Hartney	Realty Specialist
Amy Markstein	Planning and Environmental Coordinator
Darrell Tersey	Natural Resource Specialist
Robert Walter	Outdoor Recreation Planner
Amy Sobiech	Archaeologist
Zach Driscoll	GIS Specialist
Margie Guzman	Assistant Tucson Field Manager
Jayne Lopez	Tucson Field Manager

### 4.3 References

United States Department of Agriculture, Natural Resource Conservation Service. 2014 Ecological Sites, <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/landuse/rangepasture/?cid=stelprdb1068392>.

U.S. Department of the Interior, Bureau of Land Management. 1988 Phoenix Resource Management Plan.

U.S. Department of the Interior, Bureau of Land Management. 2012 Baboquivari Peak Wilderness and Coyote Mountains Wilderness Management Plan.

U.S. Department of the Interior, Bureau of Land Management. 2013 Ironwood Forest National Monument Resource Management Plan.

U.S. Department of the Interior, Bureau of Land Management. 2017 Tucson Field Office Visual Resource Inventory.

## APPENDIX A. COMMENT RESPONSE TABLE

### A.1.

Comment Number	Commenter	Topic	Comment	Response
1	Geraldine Brunson, Martin Koether	Subdivision Impacts	The private parcels in the Hayhook Ranch area are subject to Pima County road maintenance charges that appear on the annual property tax bills. Potential increase in use of the roads by people accessing the Wilderness could lead to higher annual maintenance charges for local residents.	BLM does not anticipate a marked increase in visitors to the Coyote Mountains Wilderness. The limit on group sizes will still apply. No additional advertising or signage will go up to draw people to the area. The County performs maintenance on Hayhook Ranch Road on a regular schedule and will not perform additional maintenance unless they receive specific requests.
2	Martin Koether	Subdivision Impacts	The residents owning the properties surrounding the proposed acquisition should be listed under Issues Identified since the impact directly affects those property owners.	This issue was eliminated from analysis based on the following information from Pima County: The impact to the tax revenue in the Hayhook Ranch Road Improvement District is minimal (about \$1,758) which would be spread among the other 130+ parcels in the District. Therefore, Pima County has no concerns about the impact of the acquisition on this District.

<b>Comment Number</b>	<b>Commenter</b>	<b>Topic</b>	<b>Comment</b>	<b>Response</b>
3	Martin Koether	Subdivision Impacts	If access is being considered by utilizing Hayhook Ranch Road and through other areas of the Hayhook Ranch using existing dirt roads, I am vehemently opposed to the acquisition. We have had enough issues with off-road vehicles encroaching on the area.	The physical access through the subdivision will not change. Vehicles will be limited to existing routes. No new routes will be created. Motorized overland travel on BLM land is not permitted.
4	Altar Valley Conservation Alliance	Wildlife	Analysis should be done on impacts to Bighorn sheep	No development to the 477 acres of land is included in this proposed action. Therefore, there will be no impacts to species. This issue is removed from detailed analysis.
5	Altar Valley Conservation Alliance	Wildlife	Analysis should be done on impacts to Pygmy owl.	No development to the 477 acres of land is included in this proposed action. Therefore, there will be no impacts to species. This issue is removed from detailed analysis.
6	Martin Koether	Wildlife	Has a study been completed to identify the Desert Tortoise on the proposed acquisition land?	No development to the 477 acres of land is included in this proposed action. Therefore, there will be no impacts to species. The Desert Tortoise will receive additional protection under federal law on the acquired lands. If BLM proposes any ground disturbing projects on the acquired parcels in the future, a Desert Tortoise inventory/study may be conducted at that time.
7	Pima County	Wildlife	How would the proposed land acquisition affect Pima County's MSCP covered species, including the pygmy owl?	No development to the 477 acres of land is included in this proposed action. Therefore, there will be no impacts to species. This issue is removed from detailed analysis.

<b>Comment Number</b>	<b>Commenter</b>	<b>Topic</b>	<b>Comment</b>	<b>Response</b>
8	Altar Valley Conservation Alliance	Range	Analysis should be done on impacts to livestock related issues.	Range impacts are now included as an issue carried forward for detailed analysis in this EA.
9	John F King and Son, Inc. King's Anvil Ranch	Range	There is a significant need to avoid public intrusion within the area of active cattle ranching, not only for the safety of the public, but also to preserve the fencing, ancillary improvements, and the health and safety of the cattle.	Private landowners are responsible for trespassers on their lands. The BLM has no jurisdiction on private land. There will be signs and fencing marking the boundary of public land.
10	Pima County	Range	Please identify Pima County fee lands and grazing lease on the map. Will the new acquisition be added to Pima County's grazing lease? Or will the parcel potentially be leased to another entity for grazing?	Updated map sent on 8/9/2018. The proposed acquisition parcels are adjacent to the Hayhook Allotment, however, upon acquisition, BLM would not allow grazing on the acquired lands, in accordance with the Record of Decision for the Phoenix District Portion of the Eastern Arizona Grazing Environmental Impact Statement and Rangeland Program, September 1987. The decision states that land that is presently unleased for livestock use would remain unleased, with vegetation reserved for wildlife and non-consumptive use.
11	Martin Koether	Vegetation	Has a study been completed to identify Pima Pineapple Cactus on the proposed acquisition land?	No Pima Pineapple Cactus were encountered on the land during a survey completed by BLM staff.



Comment Number	Commenter	Topic	Comment	Response
12	Altar Valley Conservation Alliance	Recreation	Analysis should be done on impacts to direct and indirect impacts from access areas; e.g. recreation activities made possible by access changes: type of recreation, season, expected numbers, overnight or day use.	A detailed analysis on recreations impacts can be found in chapter 3 of the EA.
13	Martin Koether	Recreation	What recreational opportunities are being considered/proposed for the Wilderness? Would the intent be to keep this area at a primitive level?	A detailed analysis on recreations impacts can be found in chapter 3 of the EA.
14	Pima County	Recreation	What would the impacts from recreation be on lands managed by Pima County and our ranch partners? In general, we believe it would relieve pressure on our Hayhook Ranch.	A detailed analysis on recreations impacts can be found in chapter 3 of the EA.
15	Pima County	Access/ Recreation	There is a dirt road going to the Wilderness boundary along the northernmost portion of the acquisition that appears to continue into the wilderness. However, if the recreation potential is mainly rock climbing, this route would not really improve access for that activity since as we understand the best rock for climbing is much further south and west in the wilderness.	The parcel prosed for acquisition would only improve access to the Coyote Mountains Wilderness on the northeast boundary. At this time, access to the southern and western portions of the Coyote Mountains Wilderness must still be obtained from adjacent land owners.

Comment Number	Commenter	Topic	Comment	Response
16	Pima County	Access	Which routes are people already using to get to the Wilderness? Will they still have to drive through the King's (private) and State land to access the wilderness under this proposal?	People currently access the Coyote Mountains Wilderness by driving through the subdivision and by obtaining access from adjacent land owners. Access across adjacent private or tribal land will continue to be available at the land owner's discretion. The purpose of this acquisition is to provide year-round public access to the Coyote Mountains Wilderness.
17	Martin Koether	Access	The BLM website for The Coyote Mountain Wilderness Area states: "Currently there is no legal access to the Coyote Mountains Wilderness. Permission to park and access to the wilderness boundary must be obtained from the private landholder or the Tohono O'odham Nation." What is the purpose of acquiring more land for a Wilderness that has no legal access?	The purpose of this acquisition is to improve year-round, legal, public access to the Coyote Mountains Wilderness.
18	Altar Valley Conservation Alliance, John F King and Son, Inc. King's Anvil Ranch	Access	These roads are unnecessary; access to the wilderness area has been regularly granted by the Anvil Ranch through private roads on a seasonal basis, during hunting season, September 1 through March 1, and for the Wilderness hikers and rock climbers through April.	The BLM's goal is to provide legal access to the Coyote Mountains Wilderness that does not require further permission from surrounding private landowners.

Comment Number	Commenter	Topic	Comment	Response
19	Altar Valley Conservation Alliance, Martin Koether, Pima County	Access	The Scoping Notice is unclear on the exact access points that the BLM hopes to develop. Analysis in the EA should differentiate between different access routes that are being proposed. Please explain how the access will be improved by the acquisition, where the access will be, and how that access will change from “only accessible by a dirt road.”	No new access routes will be created. The legal status of the access will change. Please refer to the detailed analysis on access in chapter 3 of the EA.
20	Altar Valley Conservation Alliance, John F King and Son, Inc. King's Anvil Ranch	Access	Additional roads in that area will only bring land damage. If additional roads are created, there must be a recorded video of vehicles entering and exiting the area, and, at a minimum, a commitment by the Bureau to regularly patrol the area and remove the inevitable waste and debris left behind. The BLM should also perform monitoring and maintenance of the fence between the Anvil Ranch and the Wilderness.	No additional roads will be created. Secretarial Order Number 3356 directs Department of the Interior agencies, including the BLM, to assess ongoing efforts and develop new opportunities to “enhance and expand public access to lands and waters administered by the Department— lands and waters owned by all Americans—for hunting, fishing, recreational shooting, and other forms of outdoor recreation.”
21	Peter Steere	Cultural	Has a cultural resource survey been completed for the parcel in question?	A survey is not a prerequisite for acquisition. The parcel will be surveyed in the future as priorities dictate.
22	Martin Koether	Cultural	This area is rich with remnants of the Hohokam culture. If this area was to be open to the public, how would they be protected?	All cultural resources on the parcels would come under federal protection. Resources would be protected by Section 106 of the National Historic Preservation Act.

Comment Number	Commenter	Topic	Comment	Response
23	Peter Steere	Tribal	Has the BLM thought about a joint management plan with the Tohono O’odham Nation for the Coyote Mountain Wilderness and the possible addition?	The BLM was reached out to by the Tohono O’odham Nation in regards to creating a joint management plan for the nearby Baboquivari Wilderness. Coyote Mountains Wilderness will also be included in these discussions going forward.
24	Pima County	Minerals	Would BLM taking possession of this private parcel affect the disposition of minerals and if so, what affect would that have on adjacent land?	The mineral estate underlying the parcel proposed for acquisition was reserved to the federal government when the surface estate was patented. Acquisition of the surface estate on this parcel would change the procedures for staking mining claims and exploring for and developing mineral resources. Acquisition of the surface estate would not alter mineral ownership nor alter the rights of mining claimants. Currently, no mining claims exist on the parcel.

Comment Number	Commenter	Topic	Comment	Response
25	John F King and Son, Inc. King's Anvil Ranch	Hydrology	At the base of the mountain there is a site called Mendosa Spring, which creates a continuous supply of water. There is also a historic dam. It is the logical destination for hikers, hunters, campers, and sometimes party goers. The inevitable consequence of the BLM's intention to acquire a new parcel with the "objective of securing up to two legal public access routes into it" obviates the Anvil Ranch's ability to control access to this destination site. The increased amount of intrusion when public access roads are open will inevitably cause degradation to the Mendosa Spring site and surrounding area. There must be a commitment to repair any damage or compensate the owner for any necessary repairs.	Due to configuration of the property proposed for acquisition and the Kings private land, this acquisition would not change access to Mendoza Canyon.
26	Altar Valley Conservation Alliance	Hydrology	Analysis should be done on impacts to sensitive water areas.	There are no water resources within the parcel proposed for acquisition. This issue was eliminated from detailed analysis.
27	Altar Valley Conservation Alliance	Hydrology	Analysis should be done on impacts to Sensitive land areas (including Mendoza Canyon).	Due to configuration of the property proposed for acquisition and the Kings private land, this acquisition would not change access to Mendoza Canyon.

