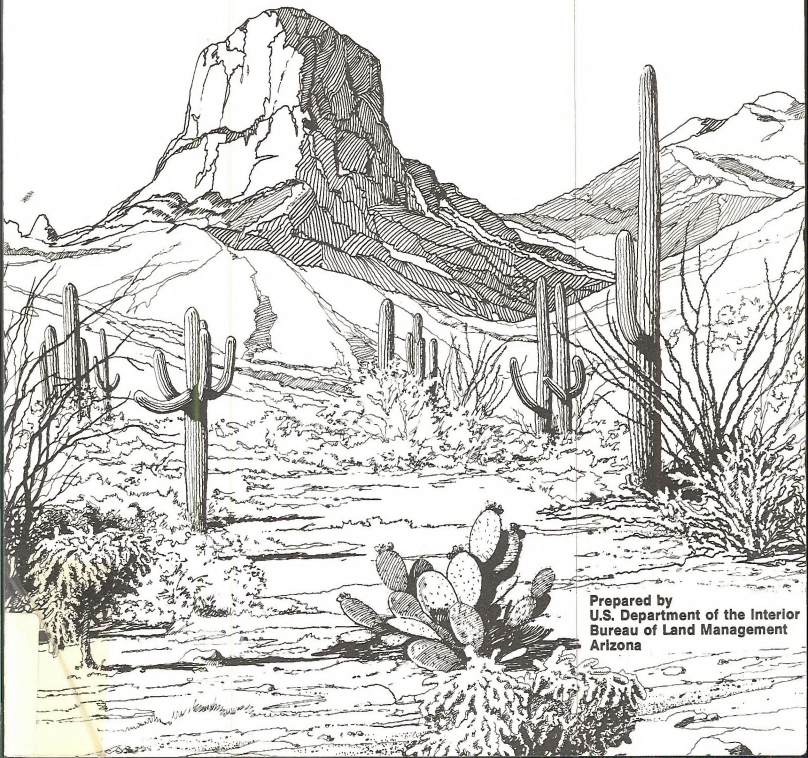




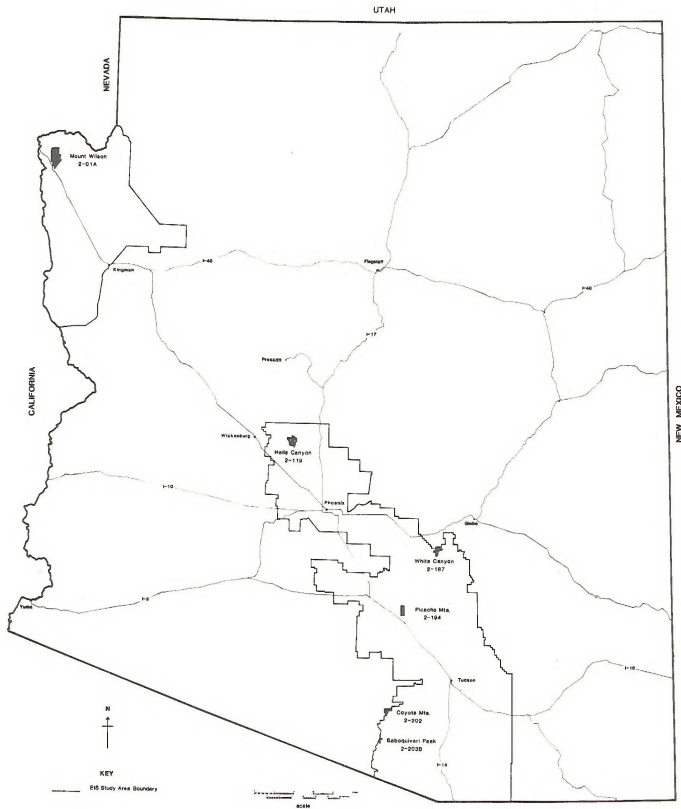
# PHOENIX

## Final Wilderness Environmental Impact Statement



Prepared by  
U.S. Department of the Interior  
Bureau of Land Management  
Arizona

# PHOENIX WILDERNESS EIS STUDY AREA





# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT ARIZONA STATE OFFICE

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P.O. Box 16563  
Phoenix, Arizona 85011

1792 (931)

This document is the Final Environmental Impact Statement (FEIS) for wilderness in the Bureau of Land Management's (BLM's) Phoenix Resource Area in Arizona. Six wilderness study areas with 54,713 acres have been analyzed for suitability for wilderness designation.

This FEIS satisfies the requirement of the Federal Land Policy and Management Act which directs the Secretary of the Interior to study public lands with wilderness characteristics. Since 1978 the BLM has been studying the public lands, reporting to the public and asking for comments from land users. This book gives my recommendation about some of the Arizona wilderness study areas.

The document is not, however, a decision document. This FEIS will go to the Director of the BLM in Washington, then to the Secretary of the Interior, along with mineral information about the study areas recommended for designation. The minerals data have been gathered and analyzed by the Bureau of Mines and the U.S. Geological Survey. The Secretary will review the minerals reports and then make his recommendations to the President of the United States by 1991. The President will in turn, forward his recommendations to Congress where the final decisions about wilderness designation will be made. Only Congress can decide which lands are to be wilderness.

On behalf of the BLM and my staff I want to tell you how much we appreciate all the time and effort contributed by so many people like you in commenting about the wilderness study areas. Bureau specialists and managers have read and listened to these comments and have, in many instances been influenced by the wishes of you--the owners of the public lands.

Sincerely,

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**FINAL**  
**ENVIRONMENTAL IMPACT STATEMENT**

**PROPOSED WILDERNESS PROGRAM**  
for the  
**PHOENIX WILDERNESS EIS AREA**

Maricopa, Mohave, Pima, Pinal, and Yavapai Counties, Arizona

Prepared by  
THE DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT



STATE DIRECTOR  
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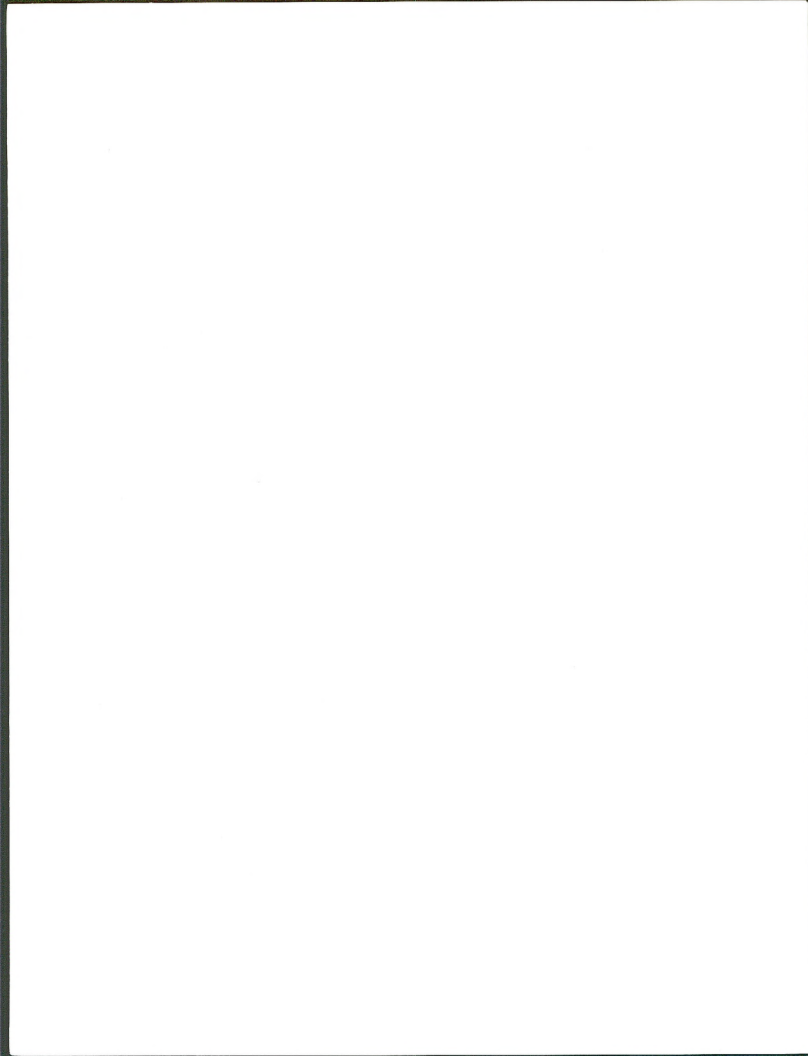
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# SUMMARY

## PURPOSE AND NEED

The Bureau of Land Management (BLM) is under congressional mandate to review roadless areas of 5,000 acres or more on public lands having wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. This final environmental impact statement (FEIS) assesses the environmental consequences of managing as wilderness six wilderness study areas (WSAs) in Arizona BLM's Phoenix District. One WSA lies north and west of Kingman, Arizona in Mohave County. The other five WSAs lie between the Prescott National Forest and the United States-Mexico border in Maricopa, Yavapai, Pinal and Pima Counties.

## SCOPING

To help "scope" and summarize significant issues related to wilderness designation, BLM requested public comments on its wilderness inventory and planning process, sent letters to interested organizations and held meetings with various user groups. Scoping served to identify the significant wilderness-related issues addressed in this EIS.

## ALTERNATIVES

The alternatives assessed in this FEIS include: (1) *No Wilderness/No Action* alternative for each WSA; and (2) the *All Wilderness* alternative for each WSA. No partial wilderness alternatives were formulated for any of the WSAs in the EIS.

The *Proposed Action* was developed after BLM's review of public comments regarding the *Phoenix Draft Wilderness Environmental Impact Statement* (BLM December 1984). The *Proposed Action* recommends as suitable for wilderness designation three WSAs — Mount Wilson, Coyote Mountains and Baboquivari Peak, totaling 31,966 acres. The Hells Canyon, White Canyon and Picacho Mountains WSAs (total of 22,747 acres) would be recommended as nonsuitable for wilderness.

Alternatives analyzed in this final EIS are different than those considered in the draft EIS because of public comments. The *Enhanced Wilderness Alternative* from the draft was adopted as the *Proposed Action* in the final EIS because it seemed to most nearly fulfill the public's requests.

## ENVIRONMENTAL CONSEQUENCES

BLM only identified impacts to those resources that would be significantly impacted by either wilderness designation or nondesignation. The following resources were identified as being significantly impacted.

### Wilderness Values

Wilderness designation would ensure the continued preservation and enhancement of wilderness values because designation would preclude most mining and all other types of development. Nondesignation would result in the impairment of some wilderness values because varying levels of development would be allowed in those WSAs not designated.

### Mineral Development

Wilderness designation would cause adverse impacts to mineral and energy exploration and development. Mining restrictions in designated areas would impose strict regulations on development of mineral resources. Thus, in many of the WSAs, mineral development would be forgone. All lands in WSAs not designated wilderness would remain open for mineral leasing and appropriation under the general mining laws and regulations.

### Wildlife

Wilderness designation would generally protect wildlife habitat from long-term cumulative habitat losses that could result from the development anticipated in WSAs not designated wilderness.

### Land Uses

Wilderness designation would prevent the building of communication sites and access roads, and prevent the granting of rights-of-way in wilderness areas. Such land uses can be allowed in WSAs not designated wilderness.

### Cultural Resources

Wilderness designation would generally benefit cultural resources in the WSAs by preventing new development. Such development improves access to cultural sites and increases visitation, often resulting in artifact collection and other vandalism.

### Recreation Use

Wilderness designation would eliminate motorized-based recreation activity, affecting both the availability of

off-road-vehicle (ORV) recreation and shifting ORV users to adjacent public lands. Elimination of motor-dependent recreation activity within the wilderness area would be accompanied by some increase in nonmotorized recreation. Overall, wilderness designation is expected to slightly increase annual recreation visitor use.

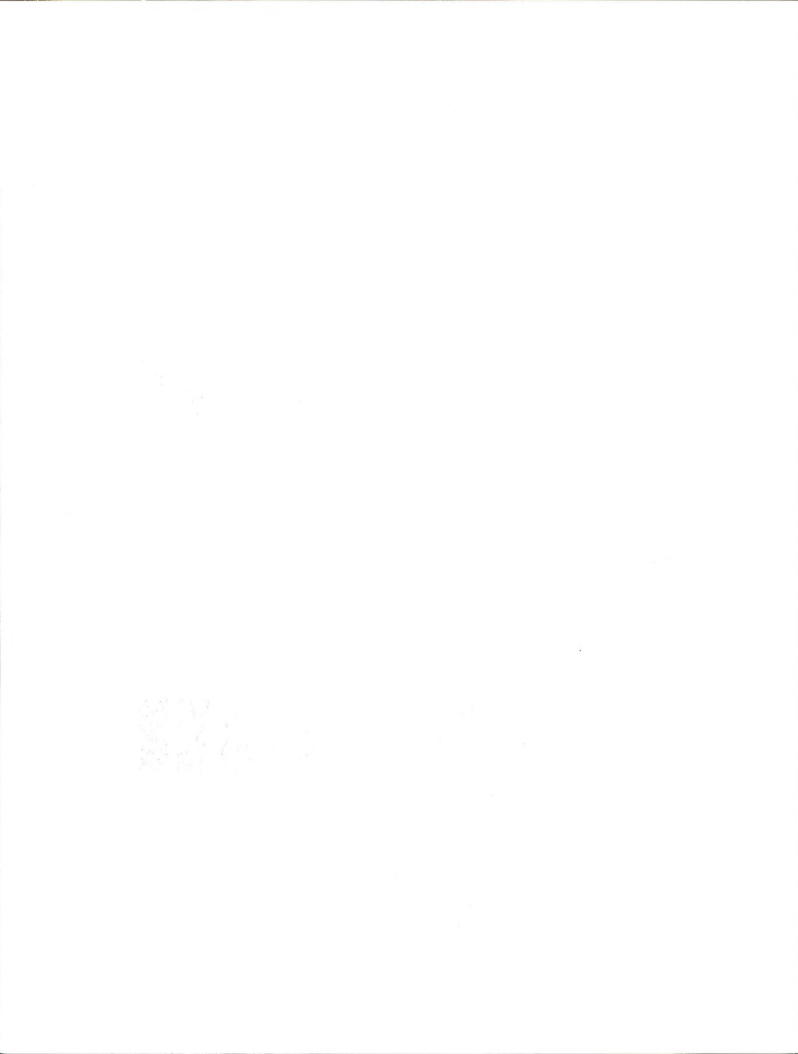
### **Economic Conditions**

Designation of White Canyon is expected to preclude development of a large scale copper mine and cause economic impacts to local communities. Wilderness designation of the other five WSAs would have little effect on local and regional economic conditions.

# **Chapter 1**

**PURPOSE**

**AND NEED**



# CHAPTER 1

## PURPOSE AND NEED FOR ACTION

### INTRODUCTION

The *Phoenix Wilderness Final Environmental Impact Statement* (FEIS) describes in detail the resources that would be impacted by the designation or nondesignation of the six wilderness study areas (WSAs) in the Phoenix FEIS area (Table 1). The FEIS then analyzes the environmental consequences, by WSA and alternative, of designating or not designating the six WSAs as wilderness.

**TABLE 1-1**  
**WILDERNESS STUDY AREAS**  
**PHOENIX FEIS**  
Bureau of Land Management,  
Phoenix District, Arizona

WSAs	Unit Numbers	Acreage
Mount Wilson	AZ-020-01A	24,821
Hells Canyon	AZ-020-126A	9,379
White Canyon	AZ-020-187	6,988
Picacho Mountains	AZ-020-194	6,400
Coyote Mountains	AZ-020-202	5,080
Baboquivari Peak	AZ-020-203B*	2,065
TOTAL		54,713

\*This area is being studied for wilderness under the authority of Section 202 of the Federal Land Policy and Management Act of 1976.

The proposed actions in the Phoenix FEIS are only preliminary recommendations about the suitability or non-suitability of six WSAs for inclusion into the *National Wilderness Preservation System* (NWPS). Only Congress can designate a WSA as wilderness or release it from the wilderness review process.

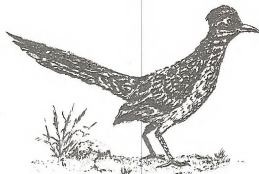
### PURPOSE AND NEED FOR ACTION

This wilderness FEIS is being developed in response to Sections 603(a) and 202 of the *Federal Land Policy and Management Act* (FLPMA) of 1976. FLPMA made wilderness preservation one of BLM's multiple use options and made the preservation of wilderness values one of the resources BLM considers in multiple use planning. FLPMA directed the Bureau of Land Management (BLM) to inventory, study and then report to Congress — through the Secretary of the Interior and the President — the public lands suitable for inclusion in the *National Wilderness Preservation System* (NWPS).

One WSA under study, Baboquivari Peak, does not qualify as a WSA under Section 603 of FLPMA because the WSA is less than 5,000 acres. This WSA is being studied for wilderness under the authority of Section 202 of FLPMA. Nonsuitable Section 202 WSAs will be released from wilderness review by the appropriate BLM State Director. Section 202 WSAs preliminarily recommended suitable for wilderness will be reported to Congress following the same procedure as Section 603(a) WSAs.

In compliance with the *National Environmental Policy Act*, this FEIS describes the significant environmental effects of implementing or not implementing wilderness management on public lands. The *Proposed Action* represents BLM's preliminary wilderness recommendations for these six WSAs. These recommendations are subject to change during public and administrative review of this document.

FLPMA requires the Secretary of the Interior to report wilderness recommendations to the President by October 21, 1991 (FLPMA, Section 603(a)). The President must report final recommendations to Congress within two years (October 21, 1993). Only Congress can designate a WSA as wilderness. Congress has no time limit for acting upon the President's recommendations. When Congress designates a WSA as wilderness, BLM will then manage those acres as wilderness. Lands not designated wilderness by Congress will be managed according to the principles of multiple use and in conformance with existing BLM land use plans, policies and regulations.



### SCOPING (ISSUE IDENTIFICATION)

Scoping served to identify the significant environmental issues to be analyzed in the Phoenix EIS and served to eliminate from detailed study the issues thought to be insignificant. The significant environmental issues identified through scoping have been incorporated into the range of alternatives, and the impacts of implementing such alternatives are analyzed in this document.

BLM held several public scoping meetings to help identify public concerns about wilderness. Other concerns were identified by reviewing public comments received during the wilderness inventory. Using professional judgment, BLM resource specialists also identified issues. A description of the scoping process is presented in Appendix 1 of this FEIS.

## ENVIRONMENTAL ISSUE IDENTIFICATION

BLM's EIS team used the scoping process to identify and address public and management concerns associated with the six WSAs considered for wilderness designation. The team then defined which concerns were significant and would be analyzed in the FEIS. The following concerns were identified as significant issues.

1. **Effects on Wilderness Values** — The wilderness values of naturalness, solitude, primitive recreation and various special resource values could benefit from wilderness designation. The same values may be adversely affected by uses that would occur should the WSAs not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in all six WSAs addressed in this EIS.

2. **Effects on Development of Mineral Resources** — Wilderness designation could affect the development of mineral resources by withdrawing designated lands from mineral entry. Development of existing mining claims within designated wilderness areas could be affected by wilderness management restrictions. The effect of wilderness designation on the development of undiscovered and discovered mineral resources is an issue for analysis in all six WSAs addressed in this EIS.

3. **Effects on Recreation Use** — Wilderness designation would eliminate the use of ORVs in the WSAs which could affect the availability of opportunities for ORV recreation and shift ORV users to adjacent lands. The effect of wilderness designation on recreational and ORV use in the WSAs and its significance is an issue for analysis in all six WSAs addressed in this EIS.

4. **Effects on Riparian Habitat, Special-Status Wildlife Species and Crucial Desert Bighorn Sheep Habitat** — Wilderness designation could affect crucial wildlife habitats by eliminating surface-disturbing activities in those habitats. The effect of wilderness designation on riparian habitat and special-status species—peregrine falcon (Federal Endangered Species), Gilbert's skink, zone-tailed hawk, Cooper's hawk and sharp-shinned hawk—is an issue in the White Canyon WSA because only in this WSA would their habitats be significantly impacted by wilderness designation or nondesignation.

The effect of wilderness designation on crucial desert bighorn sheep habitat is an issue in the Mt. Wilson WSA. The effect of wilderness designation on uninhabited bighorn habitat (where future introductions are possible) is an issue in White Canyon WSA.

The remaining four WSAs may contain either riparian or special-status species habitat. However, the effect of wilderness designation or nondesignation on these habitats is not considered an issue in this FEIS because impacts to those habitats, as determined by the anticipated activities described in Chapter 2, are not considered significant.

5. **Effects on Rights-of-Way** — Wilderness designation would preclude development of new rights-of-way, while nondesignation would allow new rights-of-way to be established. The effects of wilderness on the establishment of rights-of-way is an issue only in the Picacho Mountains WSA because only in this WSA are any rights-of-way actions anticipated.

6. **Effect on Cultural Resources** — Certain cultural sites in the WSAs are possibly eligible for listing on the *National Register of Historic Places*. WSAs with these significant cultural sites are the Hells Canyon and White Canyon WSAs. The impact of wilderness designation on these significant cultural resources in these two WSAs is an issue in this FEIS.

Inventory information (less than one percent of the land area has been surveyed) indicates that the remaining four WSAs contain no cultural sites eligible for listing on the *National Register of Historic Places*. The documented archaeological sites in the remaining four WSAs include artifact scatters and petroglyphs. BLM is mandated by Congress to preserve cultural values on public land. Therefore, cultural values in the four WSAs are protected by BLM policy and congressional laws (Appendix 2) and would be protected with or without wilderness designation. Since there are no known *National Register* eligible cultural properties in the Baboquivari Peak, Coyote Mountain, Mount Wilson and Picacho Mountain WSAs, the issue of impacts to cultural resources from wilderness designation in these WSAs was dropped from further consideration.

The Baboquivari Peak WSA has religious significance to the Tohono O'odham Indians (McCool 1980). No actions that would impact this peak are expected, with or without wilderness designation, therefore, the impact of wilderness designation on the religious site in the Baboquivari Peak WSA is not an issue in this FEIS.

7. **Effect on the Economy of the Study Area** — Wilderness designation would preclude the development of several small and one large scale mining operation. The economic impact of precluding the small scale mining operations may affect local economies to some degree but would not significantly impact the diverse economy of the five county (Maricopa, Pima, Pinal, Yavapai and Mohave) economic study area. However, wilderness designation is expected to prohibit the development of a large scale mining operation in the White Canyon WSA. The economic impact of precluding this mining operation would significantly impact the local communities dependent on mining as a source of income. Therefore, the economic impact of designating or not designating the White Canyon WSA is

an issue in this EIS. Designation of the remaining five WSAs would not significantly impact the study area's economy and, therefore, the economic impact of designating these five WSAs is not an issue in the EIS.

## ISSUES CONSIDERED BUT NOT ANALYZED

The following issues were identified in scoping, but were not selected for detailed analysis in the FEIS. The reasons for setting the issues aside are discussed below.

1. **Effect on Livestock Operations** — Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have a significant adverse economic impact on their business. This issue was considered but dropped because BLM's wilderness management policy provides for (1) possible fluctuations of livestock numbers and (2) changes in the kind or class of livestock or seasons of use if warranted through monitoring data and if not impairing to wilderness characteristics.

Designation is expected to result in closer regulation of range improvement maintenance practices in the WSAs. Although the management practices of livestock operators in the six WSAs would be more closely regulated, the operators would still be allowed to maintain range improvements in a practical and reasonable manner as necessary to support existing livestock operators. Therefore, the effect of wilderness designation on livestock operations is not an issue in this FEIS.

2. **Effect on Wild Burro Management** — Concerns were raised about the effect of wilderness on the management of wild burro populations in the Hieroglyphic Herd Management Area. The WSA encompasses 12 percent of the herd area. Anticipated burro management needs indicate that no specific adverse impacts to burro management would occur if an area were designated wilderness. Therefore, the effect of wilderness designation on burro management is not an issue in this FEIS.

3. **Effect on Air Quality Classification** — Concerns were raised regarding the effect of wilderness designation on air quality classifications. Since the Wilderness Management Policy states that BLM will manage all wilderness areas to comply with the air quality classification for that specific area, wilderness designation or nondesignation would not cause the air quality classifications to change. All WSAs have a Class II air quality standard. BLM will not recommend reclassification of air quality standards in designated wilderness from Class II to Class I. Therefore, this issue was dropped from further analysis in the FEIS.

4. **Effect on Water Quality** — Water quality is not expected to be impacted by wilderness designation or nondesignation because most actions that affect water quality, such as livestock grazing, will not be affected by wilderness designation. Other activities, such as mineral development, are absent or affect such small areas that their influence on water quality is negligible. Federal and state laws

affecting water quality management require mandatory compliance regardless of designation or nondesignation. Therefore, water quality is not an issue in this FEIS.

5. **Impacts on Protected Plant Species** — Populations of two federal candidate plants are known to exist in two WSAs. The species and WSAs are: *Graptopetalum bartramii* in Baboquivari Peak WSA and *Notholaena lemmoni* in Coyote Mountains WSA.

Although no other documented occurrences of federally listed, proposed or candidate plants are known from any of the WSAs, habitat similar to that which supports special status plants elsewhere in the Phoenix District exists in several WSAs. Species and WSAs are: endangered *Tumamoca macdougalii* — Coyote Mountains and Picacho Mountains WSAs; proposed *Mammillaria thornberi* and candidate *Peniocereus greggii* — Picacho Mountains WSA; candidates *Cheilanthes pringlei* and *Dalea Tentaculoides* — Coyote Mountains and Baboquivari Peak WSAs; candidates *Graptopetalum bartramii* and *Coryphantha scheeri* var. *robustispina* — Coyote Mountains WSA; candidate *Notholaena lemmoni* — Baboquivari Peak WSA; candidates *Astragalus lentiginosus* var. *ambiguus* and *Pentstemon bicolor* var. *roseus* — Mt. Wilson WSA.

The effect of wilderness designation on protected plants is not considered an issue in this FEIS because anticipated actions described in Chapter 2 would not significantly affect habitat for any special-status plant species.

6. **Impacts on State and Private Surface and Non-federal Mineral Inholdings** — The issue of how wilderness designation or nondesignation would affect state or private land inholdings or nonfederal mineral inholdings was identified in the scoping process. This issue was dropped from further consideration because the uses on these lands would not change as a result of designation or nondesignation. Also, BLM is required to allow access to inholdings in a designated wilderness. Therefore, inholdings are not an issue in any of the WSAs addressed in this FEIS.

7. **Impacts on Wildlife** — Many comments on the draft EIS expressed a general concern for wildlife without identifying specific issues associated with wildlife. An issue dealing with wildlife in general was considered but not included in this FEIS. Projections of development in all six WSAs in general indicate that little or no change in wildlife populations or habitat (except those identified in Issue No. 4) is anticipated with wilderness designation or nondesignation. Therefore, the effect of wilderness designation or nondesignation on wildlife in general is not an issue in any of the six WSAs addressed in this FEIS.

Specific concerns were expressed about desert tortoise habitat in the Picacho Mountains WSA. Projected development in the Picacho Mountains WSA is not expected to significantly impact desert tortoise habitat. Therefore, the effect of wilderness designation on desert tortoise is not an issue in this FEIS.

8. **Impact on Soil Erosion** — Consultation with the Soil Conservation Service has indicated that none of the WSAs have significant soil erosion problems. Therefore, the effect of wilderness designation or nondesignation on soil erosion is not an issue in any of the six WSAs addressed in this FEIS.

9. **Social Elements** — Social attitudes and values are not expected to be impacted by the designation or nondesignation of wilderness. Therefore, social elements are not an issue in this FEIS.

10. **Military Overflights** — There will be no specific prohibition of overflights above designated wilderness areas by aircraft on essential military training missions. Where low overflights would be expected to become a problem, wilderness management plans would provide for liaison between BLM and the military in efforts to resolve overflight problems. Therefore, military overflights are not an issue in this FEIS.

11. **The WSAs being studied are not what Congress intended to be included in the National Wilderness Preservation System** — This issue was dropped since it was determined in the inventory stage of the BLM's wilderness review process that all the WSAs except the Baboquivari Peak WSA meet the *minimum* standards for wilderness identified by the Congress in the *Wilderness Act of 1964* and the *Federal Land Policy and Management Act of 1976* (FLPMA). As explained in Chapter 1, the Baboquivari Peak WSA is less than 5,000 acres and is being studied under Section 202 of FLPMA.

## DEVELOPMENT OF ALTERNATIVES

Development of the alternatives is guided by requirements of the Bureau's *Planning Regulations, 43 CFR, part 1600*. The BLM's *Wilderness Study Policy* (published February 3, 1982, in the *Federal Register*) supplements the planning regulations by providing the specific factors to be considered during the planning process in developing suitability recommendations.

Two alternatives were selected for analysis. The BLM *Wilderness Study Policy* calls for the formulation and evaluation of alternatives ranging from *No Wilderness/No Action to All Wilderness*. No partial wilderness alternatives were formulated for any of the WSAs in this EIS. Therefore, the alternatives assessed in this FEIS include: (1) a *No Wilderness/No Action* alternative for each WSA; and (2) the *All Wilderness* alternative for each WSA.

The *Proposed Action* was developed after BLM's review of public comments regarding the *Phoenix Draft Wilderness Environmental Impact Statement* (BLM December 1984).

The *Proposed Action* recommends as suitable for wilderness designation three WSAs in their entirety—Mount Wilson, Coyote Mountains and Baboquivari Peak, totaling 31,966 acres. The Hells Canyon, White Canyon and the Picacho Mountains WSAs (total of 22,747 acres) would be recommended as unsuitable for wilderness under the *Proposed Action*. Table 1-2 shows WSA acres recommended suitable and unsuitable for wilderness designation.

Alternatives analyzed in this final EIS are different than those considered in the draft EIS. The *Enhanced Wilderness* alternative in the draft EIS is BLM's *Proposed Action* in this final EIS. The *Proposed Action* in the draft EIS has been dropped from consideration in the final EIS.

TABLE 1-2  
SUITABILITY RECOMMENDATIONS —  
PROPOSED ACTION

Bureau of Land Management,  
Phoenix District, Arizona

WSAs		Proposed Action	
Number	Name	Suitable	Unsuitable
2-01A	Mount Wilson	24,821	0
2-119	Hells Canyon	0	9,379
2-187	White Canyon	0	6,968
2-194	Picacho Mountains	0	6,400
2-202	Coyote Mountains	5,080	0
2-203B	Baboquivari Peak*	2,065	0
TOTAL		31,966	22,747

\*This area is being studied for wilderness under the authority of Section 202 of FLPMA.

SOURCE: Phoenix District files

## ALTERNATIVES CONSIDERED BUT NOT RECOMMENDED FOR DETAILED STUDY

Partial wilderness alternatives for the Mount Wilson and White Canyon WSAs were considered and then eliminated from detailed study since they neither improved manageability nor eliminated potential resource conflicts.

**Mount Wilson** — One partial wilderness alternative of 13,000 acres was considered. This alternative eliminated areas with moderate to high mineral potential. However, the partial wilderness proposal made boundaries difficult to find on the ground, reduced the quality of the WSA's solitude opportunities and reduced the acreage of protected crucial bighorn sheep habitat.

**White Canyon** — One partial wilderness alternative, designating 4,400 acres in the northern part (including the riparian habitat in White Canyon), was analyzed. This alternative would have excluded from wilderness a probable large open pit mineral development in the south half. The quality of the WSA's opportunities for primitive recreation and solitude was greatly diminished by the boundary adjustment. Moreover, the reduced area considered under this partial alternative was considered too small to be effectively managed as wilderness.

Partial wilderness recommendations for resolving manageability or resource conflict problems were not feasible for the Hells Canyon, Picacho Mountains, Coyote Mountains or Baboquivari Peak WSAs, because of size, topography, or configuration. Boundary adjustments would have reduced the size of the WSAs to areas too small to be effectively managed as wilderness.



# **Chapter 2**

# **ALTERNATIVES**



# CHAPTER 2

## ALTERNATIVES INCLUDING THE PROPOSED ACTION

### INTRODUCTION

This chapter describes in detail the alternatives selected for analysis in this final environmental impact statement (FEIS). To provide the public and the decisionmaker with a convenient tool for comparing impacts, defining issues and reaching conclusions, the chapter ends with a summary comparing, for each WSA, the effects on resources that would result from each alternative.

### DESCRIPTION OF THE ALTERNATIVES

This section provides a description of the alternatives being considered for each WSA in this FEIS. First is a general description of the alternative and then the management actions or uses anticipated under each.

Since the pattern of future management actions in each of the WSAs cannot be predicted with certainty, assumptions are made to allow impacts to be analyzed. These assumptions are the basis of the management actions developed for each WSA and alternative. The management actions are not management proposals, but are believed to represent probable patterns of activities which might occur as a result of wilderness designation or nondesignation. Management actions for each WSA and alternative are described for minerals, lands, rangeland management and recreation use. The following are the assumptions used by resource specialists in identifying the land uses likely to take place under each of the alternatives.

#### Minerals Actions

- Valid existing rights would allow mining activities in a designated wilderness to continue.
- All mineral development projections are based on past production activities, current exploration activities and on geological inference.
- Mineral discoveries would have to be made prior to October 21, 1991, the assumed date of designation. The claimant must have proof of validity of discovery prior to October 21, 1991.
- With the exception of an operation in the White Canyon WSAs, all the mineral exploration and development programs described for each alternative are expected to be small scale mining operations that would require little road building. The typical small scale mining operation identified in this FEIS would employ fewer than twenty people, last fewer than ten years and disturb fewer than five acres (unless otherwise identified). Only in the White Canyon WSA is a large scale mining operation anticipated (see White Canyon WSA, Chapter 2).
- No oil or gas development is anticipated in any of the WSAs addressed in this EIS.

#### Lands Management Actions

— Currently no pending applications exist for any rights-of-way identified in Chapter 2 of this FEIS. All management actions describing rights-of-way are based on probable occurrences.

#### Rangeland Management Actions

- Development of range improvements in any of the WSAs would be allowed if the improvement meets the nonimpairment criteria identified in the Wilderness Management Policy.
- Adjustments in grazing preference will be based on BLM range monitoring studies, allotment evaluations and consideration of impacts on all natural resources.

#### Recreation Use Actions

- Visitor use in the WSAs is projected 25 years into the future, and all predictions are based on Arizona's projected population increases over that period. It is assumed that recreation use would increase proportionately with the state's population increases. No recreational facilities exist or are planned in any of the WSAs addressed in this EIS.
- Vehicles are used to travel to all WSAs (and within some) and, as such, are currently a part of all recreation use.

### MOUNT WILSON—WSA 2-01A (Map 2-1) PROPOSED ACTION (ALL WILDERNESS)

All of the Mount Wilson WSA's 24,821 acres would be designated as wilderness under the *Proposed Action*.

**Livestock and Rangeland Actions.** The Big Ranch allotment is classified ephemeral. It is anticipated that the ephemeral classification would be maintained and livestock would continue to be licensed when ephemeral forage is available. The one spring development in the WSA would continue to be maintained. No new improvements are proposed.

**Recreational Use Actions.** Designation would close the entire 24,821 acres, including 4.25 miles of existing vehicle ways, to motorized recreational use. Presently, recreation use amounts to about 200 motorized and 200 nonmotorized visitor days/year. Wilderness designation is expected to increase recreational use of the area to about 800 nonmotorized visitor days/year in 25 years. Such use would consist mainly of backpacking, sightseeing and hunting. No visitor service facilities are planned in the WSA.

**Lands Actions.** Development in the WSA is not anticipated and no need for rights-of-way into or across the WSA is anticipated.

**Minerals Actions.** No mineral exploration or production activities are anticipated if this WSA is designated wilderness.

## NO WILDERNESS

None of the Mount Wilson WSA's 24,821 acres would be designated as wilderness under the *No Wilderness* alternative.

**Livestock and Rangeland Actions.** The Big Ranch allotment's ephemeral (authorizing livestock numbers based on annual forage) classification would continue. The one spring in the WSA would continue to be maintained. No new improvements are proposed.

**Recreational Use Actions.** The WSA would remain open to a variety of recreational uses, including hunting, sightseeing and hiking. Future ORV designations are expected to limit ORV recreational use in the area to the 4.25 miles of existing vehicle ways and to dry washes.

Present use for recreation amounts to about 200 motorized and 200 nonmotorized visitor days/year. An increase to 400 motorized and 400 nonmotorized visitor days/year can be expected within 25 years, due mainly to a projected population increase in the general area. No developments for visitor services are planned in the WSA.

**Lands Actions.** No rights-of-way development within or across the WSA is anticipated.

**Minerals Actions.** Two mineral exploration programs for precious metals are anticipated in the southwestern portion. The exploration would be concentrated northeast of the Two B's mine along the western boundary of the WSA. Development of a small underground mine with associated impacts is expected near the Two B's mine. Construction of one mile of primitive road would enter the WSA along the western edge and total area of disturbance would be less than five acres.

An additional exploration program seeking large tonnage, low grade ore is expected to commence along the eastern side of the WSA. Exploration access roads will total two miles — with about 15 drill sites (1/4 acre each) required. At this time no development is expected to result from these exploration programs.

## HELLS CANYON—WSA 2-119 (Map 2-2)

### PROPOSED ACTION (NO WILDERNESS)

None of the Hells Canyon WSA's 9,379 acres would be designated wilderness under the *Proposed Action*.

**Livestock and Rangeland Actions.** Livestock use on BLM-administered lands on the Castle Hot Springs, Lake Pleasant and Cottonwood Creek allotments is expected to remain at 60 AUMs, 936 AUMs and 96 AUMs respectively. The 11L Ranch allotment is projected to increase from 1,824 to 2,006 AUMs in the long term. Authorizing additional livestock on an ephemeral basis would continue. Presently two springs, five reservoirs, three corals, six wells and four miles of fence exist within this WSA boundary. Maintaining these improvements would continue as it has in the past. No new improvements are proposed.

**Recreational Use Actions.** Future ORV designations are expected to restrict ORV recreation to the existing 1.7 miles of vehicle ways and to dry washes.

Present use amounts to about 100 motorized and 470 nonmotorized visitor days/year for all recreation. An increase to 300 motorized and 1,200 nonmotorized visitor days/year can be expected within 25 years, due largely to expected population increases in the general area. No developments for visitor services are planned.

**Lands Actions.** No rights-of-way construction is anticipated within or across the WSA.

**Minerals Actions.** An exploration program is anticipated in T. 7 N., R. 1 W., sec. 21, SE $\frac{1}{4}$ , to locate lead and silver deposits. Construction of drill pads and the drilling of several exploration drill holes would disturb less than one acre. The anticipated production would consist of a small underground mine with associated tailings pile and upgraded access. No more than two acres would be disturbed by this mining and milling operation.

An exploration program is also anticipated in T. 7 N., R. 1 W., sec. 18, S $\frac{1}{2}$ , to locate gold and silver deposits. The program would consist of several exploration drill holes, as well as extended (less than one-half mile) and upgraded access. Less than one acre would be disturbed by the exploration activities. Anticipated small scale production would consist of a small underground mine with an associated tailings pile. No more than two acres would be disturbed by this mining operation.

Individual prospectors are expected to continue exploring the WSA on a small scale. Additional mining claim location would be anticipated to result from these activities. Localized discoveries from these prospecting operations are likely and small scale production facilities probable.

## ALL WILDERNESS

All 9,379 acres of the Hells Canyon WSA would be designated as wilderness under the *All Wilderness* alternative.

**Livestock and Rangeland Actions.** Livestock use on BLM-administered lands on the Castle Hot Springs, Lake Pleasant, and Cottonwood Creek allotments is expected to remain at 60 AUMs, 936 AUMs and 96 AUMs respectively. The 11L Ranch allotment is projected to increase from 1,824 to 2,006 AUMs in the long term. Authorizing additional livestock on an ephemeral basis would continue to occur. Presently two springs, five reservoirs, three corrals, six wells and four miles of fence exist within this WSA boundary. Maintaining these improvements would continue as it has in the past. No new improvements are planned.

**Recreational Use Actions.** Designation would close the entire 9,379 acres, including 1.7 miles of vehicle ways, to motorized recreational use. Present uses—hiking, hunting, sightseeing and rock collecting—would continue if the area is managed as a wilderness. Current recreation uses amount to about 100 motorized and 470 nonmotorized visitor days/year. Designation is expected to increase use to about 1,600 nonmotorized visitor days/year.

**Lands Actions.** No developments requiring rights-of-way within or across the WSA are anticipated.

**Minerals Actions.** An exploration program assumed to have valid existing rights is anticipated in T. 7 N., R. 1 W., sec. 21, SE $\frac{1}{4}$ , to locate lead and silver deposits. Construction of drill pads is expected to disturb less than one acre of land. A small underground mine with associated tailings pile is anticipated from this exploration program. Access would require upgrading for the production activities. Fewer than two acres would be disturbed by this mining and milling operation.

## WHITE CANYON—WSA 2-187 (Map 2-3)

### PROPOSED ACTION (NO WILDERNESS)

None of the White Canyon WSA's 6,968 acres would be designated as wilderness under the *Proposed Action*.

**Livestock and Rangeland Action.** It is projected that livestock use would be maintained at 2,256 AUMs annually for the Tortilla Mountain allotment and 2,964 AUMs annually for the Mineral Mountain allotment. Authorizing additional livestock when ephemeral forage is available would continue. Improvements include one spring, one mile of stock trail, two miles of pipeline, one reservoir and 3.5 miles of fence; maintenance would continue as in the past. No new improvements are proposed.

**Recreational Use Actions.** The WSA would remain open to recreational uses including hiking, camping, rock collecting and hunting. No restrictions are planned for ORV recreation, but due to the rugged terrain this use is expected to be confined to the nine miles of existing vehicle ways and the dry washes.

Recreation use at present amounts to about 300 motorized and 500 nonmotorized visitor days/year. A slight decrease to perhaps 200 motorized and 300 nonmotorized visitor days/year is expected over the next 25 years due to a projected increase in mining operations over a large part of the area. No visitor service facilities are planned.

**Lands Actions.** A right-of-way for electrical distribution lines would be needed to serve the expected mining of a known copper deposit in the southern portion of the WSA. No other developments requiring rights-of-way are anticipated in the WSA.

**Minerals Actions.** The southern portion of the White Canyon WSA in T. 3 S., R. 12 E., secs. 22, 23, 26, and 27 is expected to undergo extensive explorations of a known copper deposit. Explorations would require the construction of access roads one to two miles in length to accommodate large drill rigs and equipment. About 50 drill sites less than 1/4 acre in size are anticipated. An open-pit copper mine is expected to result from these exploration activities. Construction of several new roads into this mine complex and a tailings storage area would be required. Approximately 640 acres would be disturbed by this mining complex.

One exploration program is anticipated in T. 3 S., R. 12 E. secs. 13, 14 and 15 to identify deposits of copper, tungsten, molybdenum, silver, gold, zinc, lead and manganese known by geologic inference to occur in areas of similar geologic characteristics. The exploration program would require the upgrading of existing vehicle ways and the construction of spur roads to drill sites. Total disturbance is expected to be five acres. No production is anticipated from these exploration programs.

## ALL WILDERNESS

All 6,968 acres of the White Canyon WSA would be designated as wilderness under the *All Wilderness* alternative.

**Livestock and Rangeland Action.** Livestock use would be maintained at 2,256 AUMs annually for the Tortilla Mountain allotment and 2,964 AUMs annually for the Mineral Mountain allotment. Authorizing additional livestock on an ephemeral basis would continue. Improvements include one spring, one mile of stock trail, two miles of pipeline, one reservoir, and 3.5 miles of fence; maintenance would continue as in the past. No new improvements are proposed at this time.

**Recreational Use Actions.** All 6,968 acres of the WSA, including nine miles of existing vehicle ways, would be closed to motorized recreational use. Current uses such as hunting, hiking and rock collecting would continue. Currently recreation accounts for about 300 motorized and 500 nonmotorized visitor days/year. If the area is designated wilderness nonmotorized visitor use is expected to increase to 525 days/year during the next 25 years. No visitor service facilities are planned in the WSA.

**Lands Actions.** No developments requiring rights-of-way within or across the WSA are anticipated.

**Minerals Actions.** No mineral exploration or production activities are anticipated if this WSA is designated wilderness.

## PICACHO MOUNTAINS—WSA 2-194 (Map 2-4) PROPOSED ACTION (NO WILDERNESS)

None of the Picacho Mountains WSA's 6,400 acres would be designated as wilderness under the *Proposed Action*.

**Livestock and Rangeland Actions.** Livestock use would be maintained at 119 AUMs annually on the Newman Peak allotment. Authorizing additional livestock on an ephemeral basis would continue. No range improvements are presently authorized within the boundary of this WSA and none are proposed at this time.

**Recreational Use Actions.** Under the *Proposed Action* alternative, the Picacho Peak WSA would remain open to recreational uses including hunting, hiking and rock collecting. Although not restricted, ORV use would be confined to the existing 1.3 miles of vehicle ways and to dry washes due to the ruggedness of the terrain.

Recreation use in the WSA amounts to about 100 motorized and 400 nonmotorized visitor days/year. Because present access problems will be compounded upon completion of the Central Arizona Project Canal along the western edge of the WSA, only a slight increase to 125 motorized and 425 nonmotorized visitor days/year of use is projected within the next 25 years. No visitor service facilities are planned.

**Lands Actions.** Under the *Proposed Action* it is anticipated that the three temporary communication sites on Newman Peak, authorized under the *Interim Management Policy*, would become permanent. Ten to fifteen additional communication sites in the WSA on Newman Peak and adjacent high peaks would be expected. The existing electrical line to one site would probably be upgraded to serve more sites. Because of the rugged terrain, no road

rights-of-way to reach the communication sites are anticipated.

**Minerals Actions.** An exploration (about eight drill holes, utilizing a track drill) program is expected in T. 8 S., R. 5 E., sec. 26, resulting in an underground gold mine. The complete project of drilling, mining and mill development and the necessary access roads would disturb about five acres.

## ALL WILDERNESS

All 6,400 acres of Picacho Mountains WSA would be designated as wilderness under the *All Wilderness* alternative.

**Livestock and Rangeland Actions.** Livestock use would be maintained at 119 AUMs on the Newman Peak allotment. Authorizing additional livestock on an ephemeral basis would continue. No range improvements are presently authorized and none are proposed.

**Recreational Use Actions.** Designation would close the entire 6,400 acres, including 1.3 miles of vehicle ways, to motorized recreational use. Hiking, hunting and rock collecting would continue. Current recreation uses amount to about 100 motorized and 400 nonmotorized visitor days/year. Access problems, compounded by the soon-to-be-completed Central Arizona Project Canal, would result in only slightly increased recreation use—to 600 nonmotorized visitor days/year after designation. No visitor service facilities are planned.

**Lands Actions.** Designation of the WSA as wilderness would require removal of three temporary communication sites on Newman Peak, authorized under the *Interim Management Policy*. No additional communication sites or other rights-of-way would be constructed if the area were designated.

**Minerals Actions.** An exploration program, on claims with valid existing rights, is anticipated in T. 8 S., R. 5 E., sec. 26. The program would be eight drill holes accomplished with a track drill, and result in an underground gold mine. The complete project of drilling, mine and mill development and the necessary access roads would disturb five acres.

## COYOTE MOUNTAINS—WSA 2-202 (Map 2-5) PROPOSED ACTION (ALL WILDERNESS)

All of the Coyote Mountains WSA's 5,080 acres would be designated as wilderness under the *Proposed Action*.

**Livestock and Rangeland Actions.** Livestock use would be maintained at 384 AUMs annually on the Coyote Mountain allotment. Authorizing additional livestock on an ephemeral basis would continue. Present improvements are one well, eight springs, one reservoir, 19.5 miles of stock trails, 1.8 miles of graded road and 5.45 miles of fence. Maintenance would continue as in the past. No new improvements are proposed at this time.

**Recreational Use Actions.** All 5,080 acres, including about one mile of vehicle ways, would be closed to motorized recreational use upon designation as wilderness. Current uses such as hiking, hunting and rock collecting would continue. Because of access restrictions, no motorized recreation currently takes place in the WSA. Present recreation use amounts to 370 nonmotorized visitor days/year. A slight increase in visitor use to 450 visitor days/year over a 25-year period could be anticipated. No visitor service facilities are planned.

**Lands Actions.** No rights-of-way development within or across the WSA is anticipated.

**Minerals Actions.** No mineral exploration or production activities are anticipated if this WSA is designated wilderness.

## NO WILDERNESS

None of the Coyote Mountains WSA's 5,080 acres would be designated as wilderness under the *No Wilderness* alternative.

**Livestock and Rangeland Actions.** Livestock use would be maintained at 384 AUMs on the Coyote Mountain allotment. Authorizing additional livestock on an ephemeral basis would continue. Present improvements are one well, eight springs, one reservoir, 19.5 miles of stock trails, 1.8 miles of graded road and 5.45 miles of fence; maintenance would continue as in the past. No new improvements are proposed at this time.

**Recreational Use Actions.** The WSA would remain open to present recreational uses. Hiking, hunting and rock collecting account for about 370 nonmotorized visitor days/year at present. Access problems are expected to limit increased use of the area. A slight decrease to 250 nonmotorized visitor days/year is projected for the next 25 years due to a projected increase in mining activity. Improved access resulting from mine roads would increase motorized visitor use to 200 days/year. No visitor service facilities are anticipated in the WSA.

**Lands Actions.** No rights-of-way development within or across the WSA is anticipated.

**Minerals Actions.** An exploration program is anticipated in the vicinity of Mendoza Canyon (T. 16 S., R. 8 E., secs. 25, 26, and 34) consisting of field reconnaissance and sampling, followed by a drilling program to define the ore body. The exploration activities would be centered around Mendoza Canyon (Bonanza Mine) with field reconnaissance of the entire WSA for pegmatite associated minerals.

This ore body delineation program would entail drilling at least 24 holes in the Mendoza Canyon/Bonanza mine area and would require the necessary road links and drill pads. A total of five acres would be disturbed. An underground mine is expected to be developed, requiring an additional 10 acres of surface to accommodate the mine-mill complex and necessary road upgrading.

Interest in the mineral potential in section 33 of T. 16S., R. 8 E., would result in nonsurface-disturbing prospecting activities; however, no production is anticipated.

## BABOQUIVARI PEAK—WSA 2-203B (Map 2-6)

### PROPOSED ACTION (ALL WILDERNESS)

All 2,065 acres of the Baboquivari Peak WSA would be designated as wilderness under the *Proposed Action*.

**Livestock and Rangeland Actions.** Livestock use on federal lands on the Saucito Mountain, Baboquivari Mountain and Thomas Canyon allotments would remain at 144 AUMs, 240 AUMs and 36 AUMs, respectively. Authorizing additional livestock on an ephemeral basis would continue. Presently one mile of fence is authorized within this WSA boundary; maintenance would continue as in the past. No new improvements are proposed.

**Recreational Use Actions.** Upon designation, all 2,065 acres of the WSA would be closed to motorized recreational use. Present uses, including rock climbing, hunting and hiking, would continue. Currently recreation use amounts to about 350 nonmotorized visitor days/year, with a projected increase to 500 visitor days/year over the next 25 years. No visitor service facilities are planned in the WSA.

**Lands Actions.** No development is anticipated and rights-of-way actions are not expected in the WSA.

**Minerals Actions.** No mining claims or mining operations exist in the WSA and none are expected in the foreseeable future.



*All alternatives except the No Wilderness alternative would designate Baboquivari Peak as wilderness. Baboquivari Peak is a well known natural landmark visible from much of south-central Arizona.*

## NO WILDERNESS

None of the Baboquivari Peak WSA's 2,065 acres would be designated as wilderness under the *No Wilderness* alternative.

**Livestock and Rangeland Actions.** Livestock use on the Saucito Mountain, Baboquivari Mountain and Thomas Canyon allotments is expected to remain at 144 AUMs, 240 AUMs and 36 AUMs, respectively. Authorizing additional livestock on an ephemeral basis would continue. Presently one mile of fence exists within this WSA; maintenance would continue as in the past. No new improvements are proposed at this time.

**Recreational Use Actions.** The WSA would remain open to recreational rock climbing, hiking and hunting. Due to the ruggedness of the terrain, absence of vehicle ways and limitations of access, there is presently no ORV use within the WSA and none is anticipated. Pres-

ent use amounts to about 350 nonmotorized visitor days/year. Only a slight increase in use to 400 nonmotorized visitor days/year could be expected within the next 25 years if present limitations of access remain unchanged. No visitor service facilities are presently planned in the WSA.

**Lands Actions.** No development within the WSA is anticipated.

**Minerals Actions.** No mining claim staking or minerals operations are expected in this WSA in the foreseeable future.

## SUMMARY OF IMPACTS

Table 2-1 summarizes impacts by alternative. For a more detailed analysis of impacts, see Chapter 4.



**TABLE 2-1**  
**SUMMARY OF IMPACTS**  
 Bureau of Land Management, Phoenix District, Arizona

**MOUNT WILSON WSA**

Environmental Issues	ALTERNATIVE	
	Proposed Action/All Wilderness	No Wilderness
Wilderness Values	Wilderness designation would maintain the WSA's wilderness values by precluding mining and motorized vehicles. Although designation would prevent impacts to the WSA's natural character on only two percent of the WSA, the impacts would be prevented in a particularly scenic area.	Nondesignation would allow activities to occur that would impair the WSA's wilderness values on 320 acres, representing one percent of the WSA. Solitude opportunities would occasionally be impacted by off-road vehicles on the outer perimeter of the WSA where off-road travel is feasible.
Mineral Resources	Designation would prevent development of one small scale gold and silver mine. In addition, a small scale exploration program to identify low grade ore deposits would be precluded by designation.	Nondesignation would allow development of one small scale gold mine, and one small scale exploration program for low grade ore.
Recreation Use	Designation would not affect the number of visitors recreating in the WSA. However, the type of recreation use would change from motorized to all nonmotorized use.	Under nondesignation current recreation use would continue. Motorized and nonmotorized use would rise to a combined total of 800 visitor days/year.
Wildlife	Designation would preserve 900 acres of crucial bighorn sheep habitat that would otherwise be lost.	Nondesignation would allow activities to occur that would reduce the WSA's bighorn sheep habitat by 900 acres. This loss would not affect the current sheep population but would slightly affect the population's potential to increase beyond existing levels.

**HELLS CANYON WSA**

Environmental Issues	ALTERNATIVE	
	Proposed Action/No Wilderness	All Wilderness
Wilderness Values	Nondesignation would allow activities to occur that would result in the loss of wilderness values in two areas within the WSA. The natural character of about six percent of the WSA would be impaired. Without designation ORV use would occasionally impair solitude opportunities throughout the WSA.	Wilderness designation would maintain the values of naturalness and solitude across 97 percent of the WSA. Mining on claims with valid existing rights would impair wilderness values on about three percent of the WSA's eastern boundary.
Mineral Resources	Nondesignation would leave 400 acres with high mineral potential open for exploration and development. In addition, one small scale gold and silver mining operation that would be precluded by designation would be allowed.	Designation would prevent development of one small scale gold and silver mine and would withdraw 400 acres with a high mineral potential from development. An existing mining operation on the WSA's eastern border is assumed to have valid existing rights and would be allowed to continue under designation.
Recreation Use	Under nondesignation, motorized and nonmotorized recreation use would increase threefold over existing levels. No new visitor facilities or other recreation development activities are anticipated within the WSA.	Designation would result in a loss of ORV opportunities for 300 motorized recreationists each year. However, nonmotorized recreation use is expected to increase by 100 visitors per year. The number of WSA visitors would remain nearly the same with designation resulting primarily in a change in the type of recreation opportunities available in the WSA.

## HELLS CANYON WSA (Continued)

Environmental Issues	ALTERNATIVE	
	Proposed Action/ No Wilderness	All Wilderness
Cultural Resources	Improved access from mining activities and the resultant increased recreation use would result in increased vandalism to the large prehistoric village in the WSA. This increased vandalism would eventually lead to total site destruction.	Designation would result in reduced vandalism to the WSA's National Register eligible cultural site and the site would remain intact for future generations.

## WHITE CANYON WSA

Environmental Issues	ALTERNATIVE	
	Proposed Action/No Wilderness	All Wilderness
Wilderness Values	Nondesignation would result in the loss of wilderness values across 52 percent of the WSA. The loss of wilderness values on 52 percent of the WSA would leave an unimpaired area too small to be considered wilderness. Thus, large scale mineral development expected under nondesignation would result in the permanent loss of the WSA's wilderness character and would result in adverse impacts to the WSA's supplemental wildlife and archeological values.	Designation of the White Canyon WSA would preserve wilderness values across the entire WSA. The entire WSA's value as a wilderness area is threatened by mineral development. Designation would also prevent the loss of the WSA's supplemental wildlife and cultural values which are threatened by mining and human disturbances.
Mineral Resources	Nondesignation would allow development of the WSA's extensive copper deposits. Development of these copper deposits is expected to result in a large scale copper mine described as world class. Development of this mine would provide needed jobs and income to the local economy. In addition, nondesignation would allow several other anticipated exploration programs to continue unhindered by wilderness restrictions.	Designation would prevent development of the WSA's extensive copper deposits. These deposits represent quantities necessary for large scale copper mining. Thus, designation would prevent development of a large scale mine with its associated beneficial economic impacts on locally depressed copper mining communities.
Recreation Use	Under nondesignation motorized and nonmotorized recreation use would be reduced by one-half existing levels because large scale copper mining activities in the WSA would reduce its recreational value. No recreational developments are planned in the undesignated area.	Designation is expected to increase the number of visitors to the WSA by only 25 visitor days per year. Designation would result in a change in the type of recreation use taking place in the WSA from partially motorized to all nonmotorized recreation.
Wildlife	Nondesignation would degrade one-half the WSA's riparian habitat and therefore cause the loss of half the WSA's population for five special-status wildlife species. In addition, the WSA would no longer be useable as a bighorn sheep reintroduction area.	Designation would prevent the loss of 50 percent of the WSA's riparian habitat that supports populations of five special-status wildlife species. Designation would also prevent the loss of the WSA as a suitable bighorn sheep reintroduction site.
Cultural Resources	Nondesignation would allow actions to occur that would result in increased vandalism to the WSA's three National Register eligible cultural resource properties. Under nondesignation these properties are expected to be vandalized to the point they are no longer of any historical value.	Designation would protect the WSA's three known National Register eligible properties from the effects of mining and vandalism. These cultural properties would otherwise be destroyed by mining activities and human disturbances, such as vandalism and road building.
Economics	Nondesignation would allow development of a large scale copper mine within the WSA. World class copper mines generally employ over 1,000 people; therefore, development of this mine would greatly benefit local economies.	Designation is expected to prevent development of a world class copper mine within the WSA. Thus, designation would cause large scale impacts to this already economically depressed area.

## PICACHO MOUNTAINS WSA

Environmental Issues	ALTERNATIVE	
	Proposed Action/No Wilderness	All Wilderness
Wilderness Values	Nondesignation would allow development to occur that would result in the loss of wilderness values across 85 percent of the WSA. The remaining 15 percent of the WSA, unaffected by development, would be so small an area that it would no longer be considered wilderness in character. Therefore, nondesignation would result in the entire WSA becoming nonwilderness in character.	Designation would prevent communication site development, thereby protecting wilderness values on 90 percent of the WSA. A mining claim assumed to have valid and existing rights would impair wilderness characteristics on 10 percent of the WSA, but designation would allow the WSA to remain wilderness in character.
Mineral Resources	Nondesignation would allow development of a small scale gold mine within the WSA.	Designation is not expected to affect development of the WSA's small scale gold and copper mine. However, designation would withdraw 3,640 acres with a moderate mineral potential from further exploration and development.
Recreation Use	Nondesignation would result in the entire WSA being available for motorized and nonmotorized recreation use. Under nondesignation this use is expected to increase by 50 visitor days per year. No change in the types of recreation or development of recreation facilities is anticipated.	Designation would result in a gain of 50 recreation visitor days within the WSA. Designation would also result in a change in the type of recreation use taking place in the WSA, from a mix of motorized and nonmotorized recreation to all nonmotorized recreation.
Land Use	Nondesignation would not impact existing or future communication site development for government and private users.	Designation would adversely impact land uses by requiring the removal of existing communication facilities and by precluding the establishment of 10 to 15 additional communication sites in the future.
Wildlife	Nondesignation would allow development to occur in the WSA that would remove the WSA from consideration as a bighorn sheep reintroduction site.	Designation of the Picacho Mountains would preserve habitat for the introduction of desert bighorn sheep. This habitat is currently threatened by communication site development.

## COYOTE MOUNTAINS WSA

Environmental Issues	ALTERNATIVE	
	Proposed Action/All Wilderness	No Wilderness
Wilderness Values	Designation would prevent development that is expected to impair the WSA's wilderness character across 69 percent of the WSA. This loss of wilderness values would make the area unuseable as wilderness; therefore, designation would maintain the WSA's wilderness qualities.	Nondesignation would result in the loss of wilderness values across 69 percent of the WSA. The loss of 69 percent of the WSA's wilderness values would make the entire WSA unuseable as a wilderness.
Mineral Resources	Designation is expected to prevent development of a commercial quality copper, gold and silver mineral deposit. In addition, 640 acres with a high mineral potential would be withdrawn and made unavailable for future mineral exploration.	Nondesignation would allow the development of the WSA's commercial copper, gold and silver deposits. In addition, 640 acres with a high mineral potential would remain open for mineral exploration.
Recreation Use	Wilderness designation would have no impact on current recreation use levels. However, a change in the type of use from motorized to nonmotorized recreation is anticipated.	Nondesignation would replace the existing type of recreation use, presently all nonmotorized, with a combination of both motorized (44 percent of total use) and nonmotorized (56 percent of total use). Overall recreation use levels would rise by 18 percent — a result of motorized recreationists using improved access roads to enter the WSA.

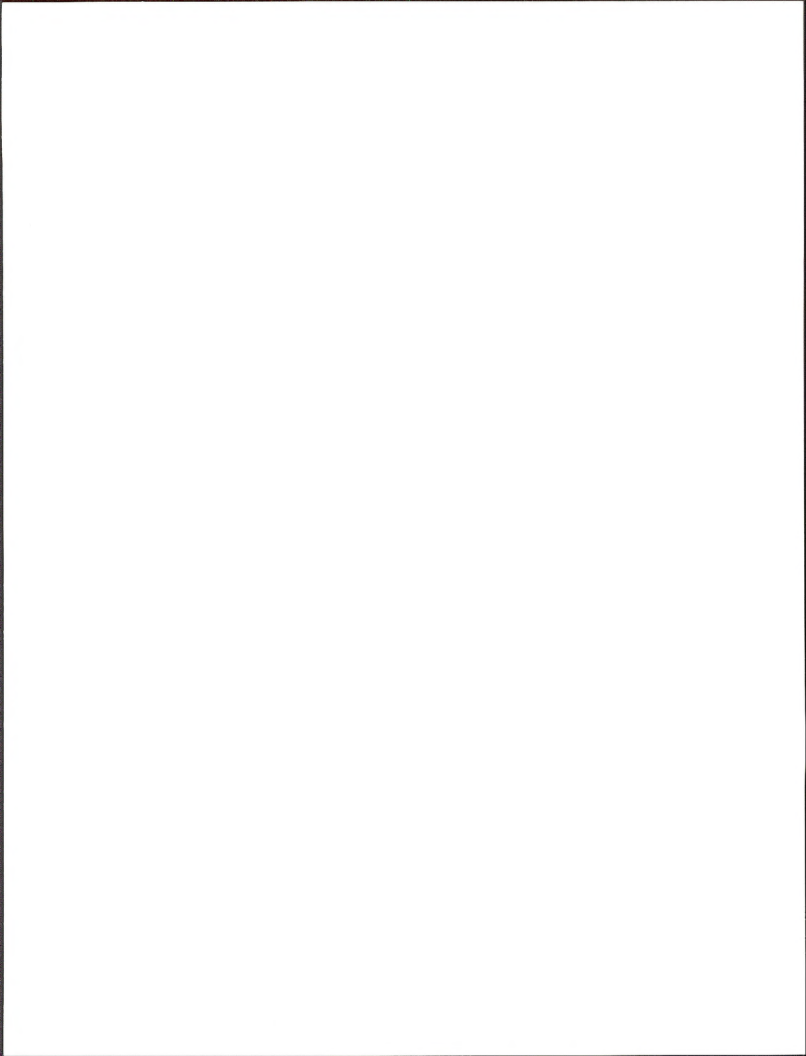
## BABOQUIVARI PEAK WSA

Environmental Issues	ALTERNATIVE	
	Proposed Action/All Wilderness	No Wilderness
Wilderness Values	All wilderness values would be protected by legislative mandate. No adverse or beneficial impacts to wilderness values are anticipated from the designation of this area as no development is expected to occur with or without wilderness designation.	None of the WSA's wilderness values would receive the legislative protection provided by wilderness designation. However, no adverse or beneficial impacts to wilderness values are anticipated because no development is expected in this WSA.
Mineral Resources	No mineral activity is anticipated in the Baboquivari Peak WSA. Therefore, designation is not expected to impact mineral development.	Nondesignation would not affect mineral development because no such development is expected in this WSA.
Recreation Use	Designation would not impact the type of recreation activities in the WSA because all such use is nonmotorized. However, such use is expected to increase by 100 visitor days per year if the area is designated.	Visitor use would remain nonmotorized but would increase by 50 visitor days per year under nondesignation.

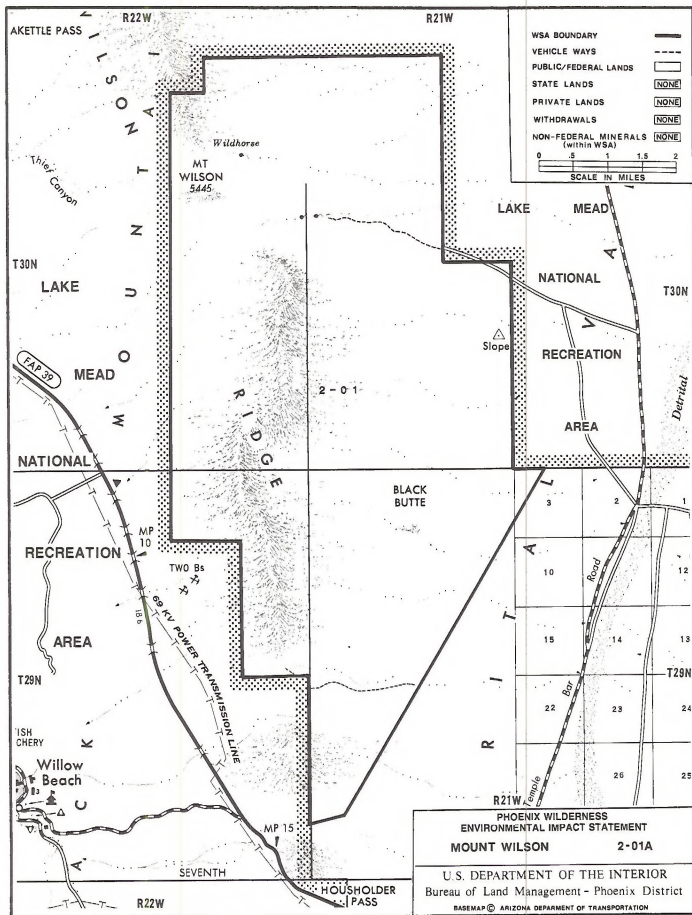
Source: Phoenix District Files

# **WILDERNESS ALTERNATIVE MAPS**

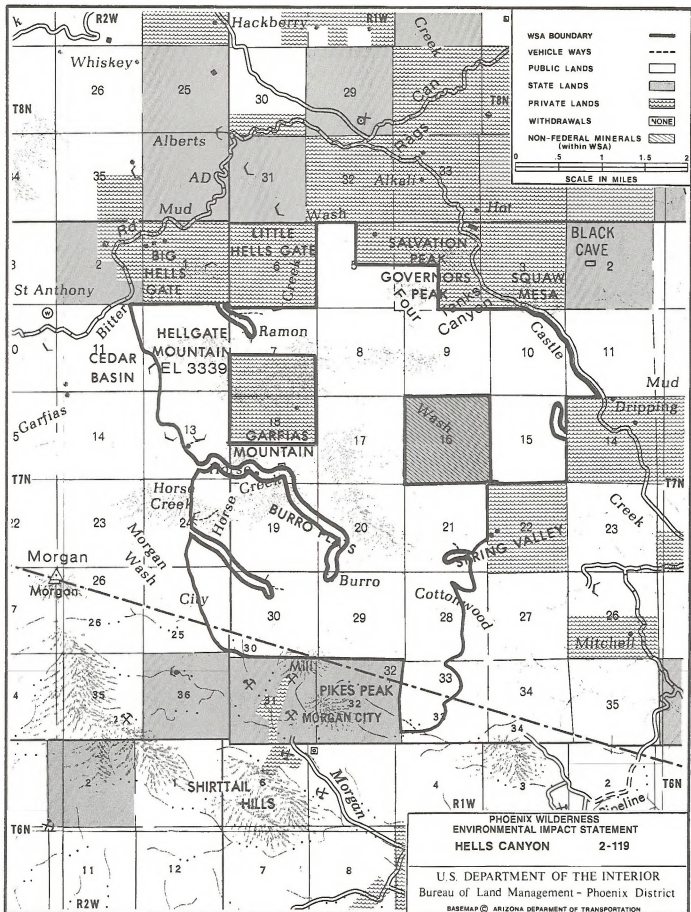
<b>MAP NUMBER</b>	<b>WILDERNESS STUDY AREA</b>
2-1	MOUNT WILSON
2-2	HELLS CANYON
2-3	WHITE CANYON
2-4	PICACHO MOUNTAINS
2-5	COYOTE MOUNTAINS
2-6	BABOQUIVARI MOUNTAINS



MAP 2-1



MAP 2-2



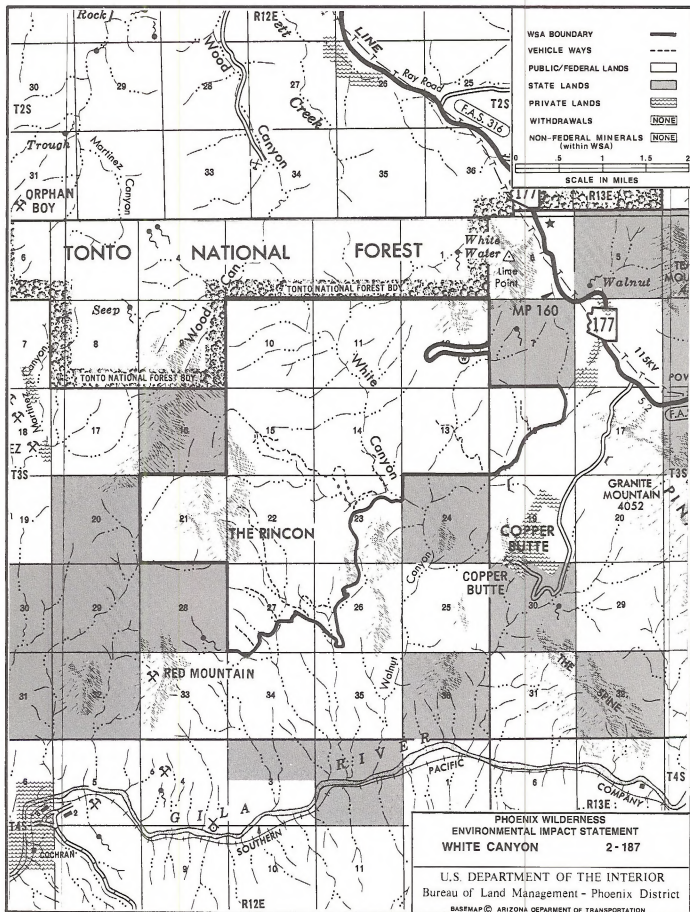
PHOENIX WILDERNESS  
 ENVIRONMENTAL IMPACT STATEMENT  
 HELLS CANYON 2-119

U.S. DEPARTMENT OF THE INTERIOR  
 Bureau of Land Management - Phoenix District

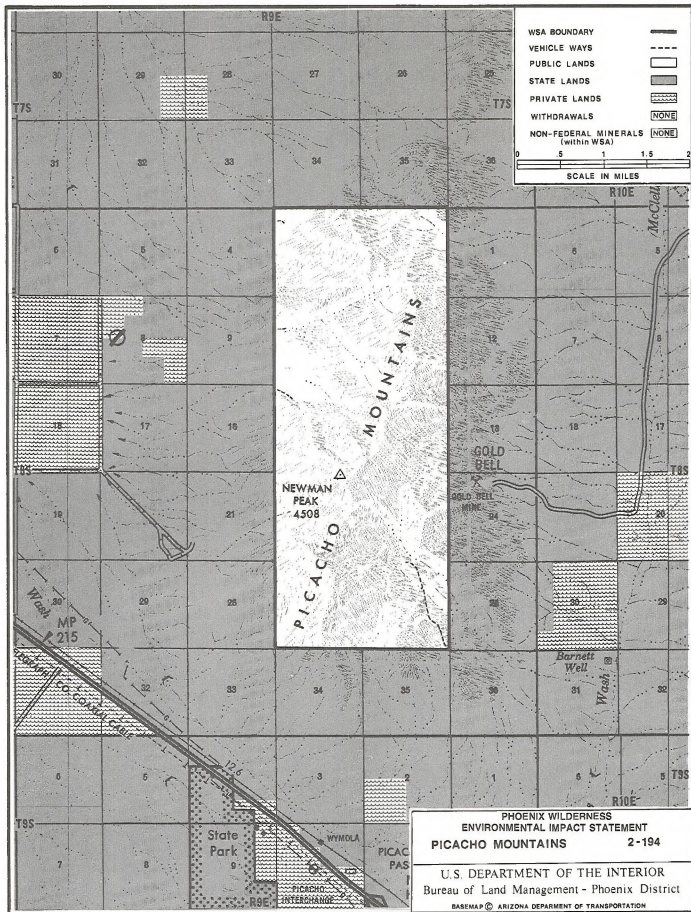
BASEMAP © ARIZONA DEPARTMENT OF TRANSPORTATION



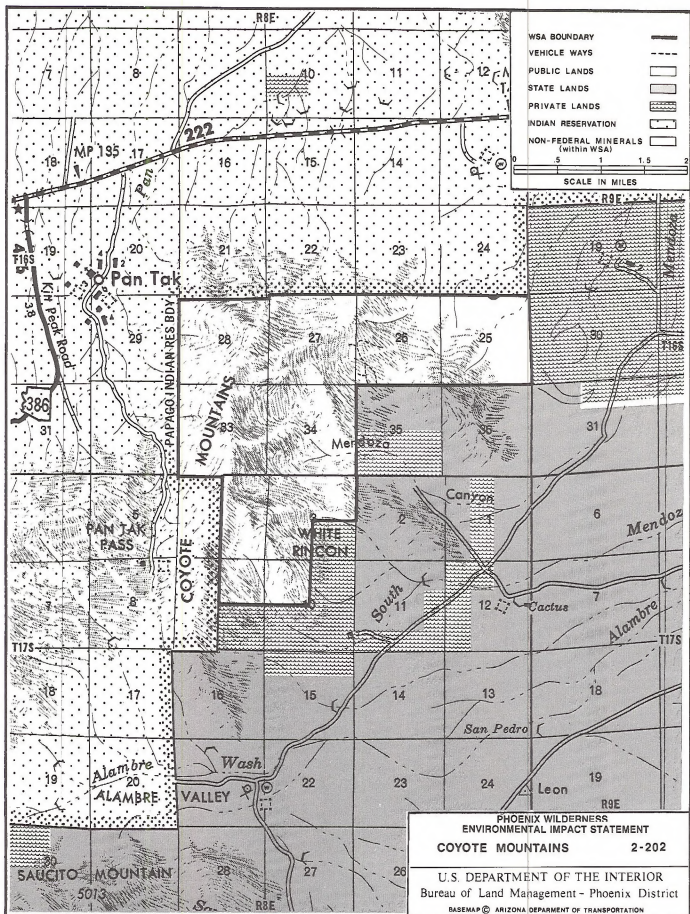
MAP 2-3



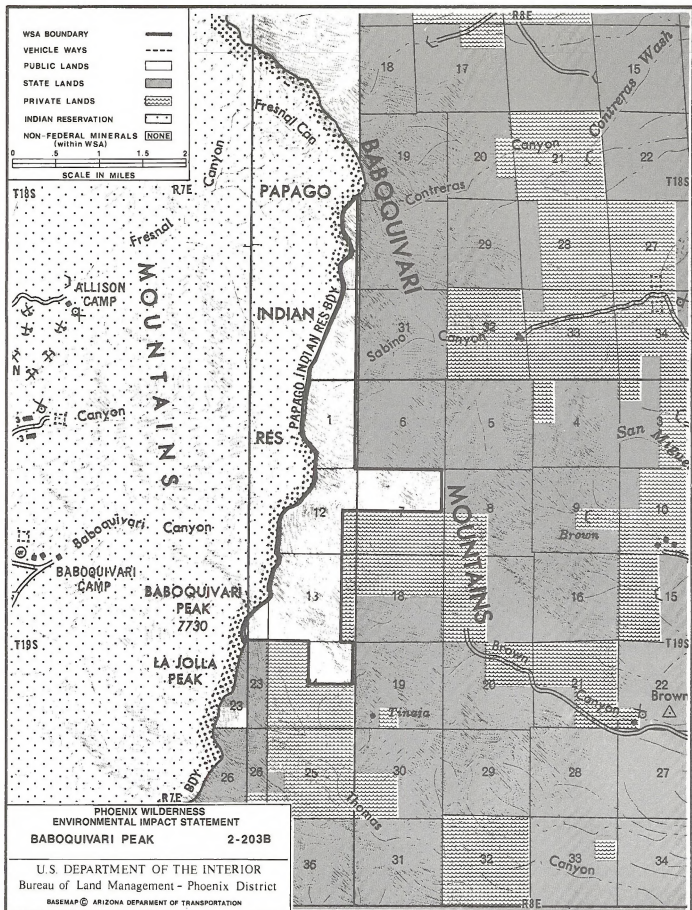
MAP 2-4



MAP 2-5



MAP 2-6



# **Chapter 3**

**AFFECTED**

**ENVIRONMENT**



# CHAPTER 3

## AFFECTED ENVIRONMENT

### INTRODUCTION

Chapter 3 briefly describes, by wilderness study area (WSA), resources that are expected to be significantly impacted by the alternatives. Where impacts to certain resources would be slight or nonexistent, descriptions are brief or are omitted. More detailed descriptions of the resources in the EIS area and of the regional socioeconomic conditions are in the Phoenix Resource Area and Cerbat-Black Mountains Management Situation Analyses (BLM 1983 and 1983a) and may be reviewed at the Phoenix District Office, Phoenix, Arizona.

The Phoenix District is divided into three resource areas which are further divided into planning areas. The six WSAs are in two BLM resource areas and four BLM planning areas.

One WSA (Mount Wilson) is in the Cerbat-Black Mountains Planning Area of the Kingman Resource Area in Mohave County of northwestern Arizona. The other five WSAs (Hells Canyon, White Canyon, Picacho Mountains, Coyote Mountains and Baboquivari Peak) are in south and south-central Arizona, in Maricopa, Pima, Pinal and Yavapai Counties. These WSAs are in BLM's Black Canyon, Middle Gila and Silver Bell Planning Areas and are administered by the Phoenix Resource Area.

### PHYSICAL SETTING

#### Topography

The EIS area lies within Arizona's Basin and Range physiographic province, an area characterized by gently sloping valleys separated by abruptly rising mountains. Elevations range from 1,650 feet near the Picacho Mountains WSA to 7,730 feet on Baboquivari Peak. Granite mountains dominate the area, with some sedimentary and volcanic outcrops.

#### Climate

The climate in the EIS area is semi-arid, with precipitation ranging from 20-22 inches in the mountains to less than 10 inches at the lower elevations. The area's climate is influenced by tropical Atlantic (Gulf of Mexico) and Pacific air masses during the warm months and by middle latitude storms from the north Pacific during the cooler months. Moisture is divided between summer thunderstorms during July, August and September (about 75 percent of the total moisture) and the winter rains of December, January and February. The summer precipitation is the result of moisture entering Arizona from the Gulf of Mexico, while during the winter it comes from storms in the Pacific Ocean. The average annual temperature in the EIS area is 65°F with a low of 6°F recorded at Tucson and a high of 118°F recorded at Redrock, Arizona (Sellers and Hill 1974).

#### Soils

The soils in the EIS area have formed in alluvium and colluvium from various parent materials. The area's hot and dry climate, limited precipitation, and steep slopes have limited the degree of soil development. The soils are generally limited by texture, depth, water-holding capacity, surface rock and slope, which contribute to their generally low to moderate productivity.

#### Air

Air quality over the WSAs is generally good and has been given a Class II rating by the State of Arizona. Most days the air is clear, but spring winds and summer thunderstorms stir up dust, increase particulate matter in the air and briefly impair air quality.

### MOUNT WILSON (AZ-020-01A) — 24,821 Acres

#### Wilderness Values

**LOCATION AND BOUNDARIES.** Mount Wilson WSA (Map 2-1) lies 55 miles northwest of Kingman, Arizona in Mohave County. With the exception of the southeastern boundary, the entire WSA is surrounded by the National Park Service's Lake Mead National Recreation Area. Mount Wilson WSA is rectangular, 5 miles wide and 11.3 miles long. The southern boundary is formed by a powerline right-of-way. Two parcels of the Lake Mead National Recreation Area (totaling 40,000 acres) are under wilderness study. The two parcels are adjacent to the north and west boundaries of the Mount Wilson WSA.

**NATURALNESS.** Wilson Ridge in the Black Mountains makes up two-thirds of the WSA. The ridge's highly visible and rugged peaks extend to the north and south and present a stark and abrupt sight to the viewer. Highest point in the WSA is Mount Wilson at 5,445 feet and the lowest point is 2,000 feet in the Detrital Valley.

Vegetation within the unit is sparse—consisting of a creosotebush-bursage community characteristic of the Mohave Desert. Creosotebush dominates the bajadas and catclaw is predominant in the washes.

Human influences on the naturalness of the Mount Wilson WSA consist of two vehicle ways, a wood frame cabin and two developed springs. One vehicle way (two miles) leads to an unmaintained wood frame cabin at the southern tip of the unit, and the other (2.25 miles) to Missouri Springs, a livestock water. Another developed water, Wildhorse Spring, was rebuilt by BLM in 1982 for desert big-horn sheep.

**SOLITUDE.** Numerous east-west trending side ridges extend from Wilson Ridge, forming remote and rugged valleys and canyons and creating a topographic complexity that provides outstanding opportunities for solitude.

**PRIMITIVE AND UNCONFINED RECREATION.** The opportunities for primitive and unconfined recreation are not outstanding in the unit. Although a variety of activities are available, such as day hiking and photography; the topographic relief of the unit tends to concentrate use into the valleys and basins created by the side ridges. This concentration would have a confining effect on the opportunities for primitive and unconfined recreation.

**SPECIAL FEATURES.** Several special features that enhance the WSA's wilderness values are the bighorn sheep habitat, the rugged and highly visible Wilson Ridge and scenic viewpoints from which one may observe vistas of the surrounding countryside for distances of 50 miles or more. Scenic views include the Grand Canyon, Lake Mead, and the El Dorado and Spring Mountains in Nevada.

### Mineral and Energy Resources

**NONMETALLIC MINERALS.** The Mt. Wilson WSA is underlain by Precambrian gneissic terrain beginning at Squaw Peak southeast of the WSA. East of Squaw Peak, geologic conditions indicate a detachment fault movement. This type of fault points to precious metal occurrence. Table 3-1 shows the number of mining claims and oil and gas leases in the WSA. Table 3-2 shows that there are no known strategic or critical minerals in the WSA.

Exploration drilling by Shell Oil Company west of Detrital Valley hit numerous slices of crustal rock that have been horizontally sheared, indicating fault movement could extend under the WSA. The area (5,000 acres) bordering the eastern boundary of the WSA is classified as highly favorable for metallic minerals due to anomalous gold value found all along the detachment zone (Map 3-1).

**TABLE 3-1**  
**WSA MINERAL STATUS**  
Bureau of Land Management,  
Phoenix District, Arizona

WSAs	Mining Claims*	Acres Under Oil and Gas Lease**	No. of Oil/Gas Leases	USGS Petroleum Potential
Mount Wilson	28	0	0	Low
Hells Canyon	113	0	0	Zero
White Canyon	34	0	0	Zero
Picacho Mountains	2	0	0	Zero
Coyote Mountains	21	0	0	Zero
Baboquivari Peak	0	0	0	Zero

\*As of July 1986

\*\*As of July 1986

SOURCE: Phoenix District maps and files



*A segment of rugged Wilson Ridge extends north to south nine miles through the Mount Wilson WSA.*



**TABLE 3-2**  
**STRATEGIC AND CRITICAL MINERALS IN WSAs**  
 Bureau of Land Management, Phoenix District, Arizona

Minerals	Mount Wilson	Hells Canyon	White Canyon	Picacho Canyon	Coyote Mountains	Baboquivari Peak
Lead	—	X	—	—	X	—
Zinc	—	—	—	X	X	—
Copper	—	X	X	X	X	O
Silver	—	X	O	—	X	X
Tungsten	—	—	—	—	O	O
Beryllium	—	—	—	—	O	O
Molybdenum	—	—	O	—	X	—
Manganese	—	—	O	—	O	—
TOTAL	0	3	4	2	8	4

X — Occurrence reported

O — Potential by geologic inference

SOURCE: Gem Reports, 1982 and 1983, Phoenix District files

The area (640 acres) northeast of the Two B's mine is classified as favorable for the occurrence of precious metals. A mineralized cone trending north of the mine area contains silver values in small narrow veins.

About 640 acres of the WSA are classified as highly favorable for nonmetallic mineral resources. A sodium accumulation has been drilled and mapped in Detrital Valley and includes the extreme eastern portion of the WSA. This area is covered by sodium leases or applications for leases (Great Basin GEM Report 1983).

The eastern half of the WSA (10,000 acres) shows moderate favorability for uranium deposits. The northeastern corner of the WSA (750 acres) is classified as moderately favorable for the presence of geothermal energy resources, with a large quaternary basalt field indicating the probability of a deep heat source.

### Recreation Uses

Due to the remoteness of Mount Wilson WSA, recreational use of any type is minimal. Any visitor use that does occur is in the form of hunting, sight-seeing or overnight hiking. Off-road vehicle use is insignificant due to the extreme steepness of the terrain and lack of vehicle accessibility. About 4.25 miles of rugged vehicle ways are found within the WSA. Existing and projected visitor use (in a no-wilderness situation) in the WSA is shown in Table 3-3.

### Wildlife Values

The entire WSA is crucial desert bighorn sheep habitat. The desert bighorn is a Group 3 state-listed species. The WSA provides yearlong habitat for 50 rams and seasonal habitat for 65 ewes and lambs. The population is considered to be stable.

**TABLE 3-3**  
**EXISTING AND PROJECTED RECREATION USE**  
 Bureau of Land Management  
 Phoenix District, Arizona  
 (VISITOR DAYS/YEAR)

WSA	Present Use	Projected Use Under Non-designation	Projected Use Under Designation
Mount Wilson			
Motorized	200	400	0
Nonmotorized	200	400	800
Hells Canyon			
Motorized	100	300	0
Nonmotorized	470	1,200	1,600
White Canyon			
Motorized	300	200	0
Nonmotorized	500	300	525
Picacho Mtn			
Motorized	100	125	0
Nonmotorized	400	425	600
Coyote Mtn			
Motorized	0	200	0
Nonmotorized	370	250	450
Baboquivari Peak			
Motorized	0	0	0
Nonmotorized	350	400	500

Source: BLM Resource Specialists



*BLM personnel hike across Burro Flats in the Hell Canyon WSA.*

### **HELLS CANYON (AZ-020-119) — 9,379 Acres**

#### **Wilderness Values**

**LOCATION AND BOUNDARIES.** Hells Canyon WSA (Map 2-2) lies 25 miles northwest of Phoenix, Arizona in Maricopa and Yavapai Counties. The unit is bounded by state and private land and the Castle Hot Springs Road.

**NATURALNESS.** The WSA lies within the Hieroglyphic Mountain Range and consists of rugged, highly dissected mountains with numerous small twisting canyons. The most prominent mountain peaks in the WSA are Garfias Mountain with an elevation of 3,381 feet and Hellgate Mountain at 3,339 feet. Other peaks, most over 3,000 feet in elevation, encircle Burro Flats, effectively isolating the flats from the surrounding countryside. Most of the WSA is covered by Sonoran desertscrub vegetation—saguaro, paloverde, barrel cactus, ocotillo, and other desert shrubs and grasses.

Six vehicle ways within the unit total 1.7 miles. One vehicle way accesses two stock tanks, another goes to a small working mine and the other four dead-end in the WSA. Several range developments are in the WSA, including developed springs, fencelines, and earthen reservoirs. An abandoned well site is found near the north end of Burro Flat.

Five cherrystem roads and several range developments within the WSA are occasionally noticeable to visitors. These developments somewhat detract from the overall quality of a visitor's wilderness experience.

**SOLITUDE.** Outstanding opportunities for solitude exist throughout much of the WSA because of topographic and vegetative screening. Numerous washes, canyons and hills afford visitors many chances to experience seclusion. The cherrystem roads and range developments found in the WSA, however, may lessen opportunities for solitude for some visitors, particularly in the Burro Flat area. Vehicles and range developments would be noticed by visitors who crossed the area.

**PRIMITIVE AND UNCONFINED RECREATION.** The area's ruggedness lends itself to outstanding primitive recreation opportunities. Several mountains with cliffs offer excellent rockclimbing, and the canyons offer opportunities for hiking and sightseeing. Primitive camping opportunities are abundant and plants, animals and geology provide quality photographic and viewing opportunities.

**SPECIAL FEATURES.** A portion of the WSA near Cedar Basin has 250 acres of relict open chaparral habitat

considered important for the Arizona Gilbert's skink. Cedar Basin is also considered unusual because of the presence of both juniper and saguaro. The Natural Area Advisory Council is considering Cedar Basin for designation as a natural area (Smith and Bender 1976). The WSA has one documented prehistoric cultural site consisting of a large amount of ceramic, lithic and groundstone material.

## Mineral and Energy Resources

The Hells Canyon WSA is underlain by Precambrian schist and granites and veneered with mid-Tertiary Laramide volcanics and intrusives. Some gold bearing veins with past production occur in the volcanics in the west-central parts of the area. This west-central part in sections 18, 19, and 30 has extensive silver, gold and copper mineralization. The mineralogical association occurs as hydrothermally altered and metamorphosed quartz monzonite and granitics.

The area on the southeast and east portion of the Hells Canyon WSA has been classified as highly favorable for metallic minerals. A mineralized hydrothermally altered zone is presently being mined, with exposure of significant silver, lead, zinc, gold and copper values. This zone extends under recent volcanic flows which conceal its extent. Commercial drilling on a small scale has been accomplished in the area.

The Governors Peak area in section 19 has had considerable exploration activity in the relatively recent past. This area is a window exposing Precambrian granites and schists opening through the Cretaceous and Tertiary (Laramide) volcanics. Copper and silver values are locally high grade and occur as chrysocolla with minor chalcocite and argentite.

According to the 1982 GEM report the WSA has 400 acres of high and 1,000 acres of moderate mineral potential (Geoplanners International, Inc. 1982). Map 3-2 shows the areas in the WSA with a moderate and high mineral potential defined.

## Recreation Uses

ORV use, hunting, hiking, rock climbing, camping, sightseeing and photography are the major recreation uses in the WSA. Although several roads and 1.7 miles of vehicle way provide access, most ORV-related use is confined to existing trails due to rugged terrain. Moderate to good dove and quail populations provide good small game hunting. Recreation uses are expected to increase as the metropolitan population of Phoenix grows and the demand for open space recreation increases. Hells Canyon is known for its scenic values.

## Cultural Resources

A large prehistoric village (BLM Site No. 1588) was recorded in the Hells Canyon WSA. Associated with the ruins are large inventories of ceramic, chipped stone and ground stone. Evidence indicates the site dates to approximately 1100 AD and was possibly Yuman culture.

## WHITE CANYON (AZ-020-187) — 6,968 Acres

### Wilderness Values

**LOCATION AND BOUNDARIES.** White Canyon WSA lies in Pinal County, 45 miles southeast of Mesa, Arizona and seven miles south of Superior, Arizona (Map 2-3). The WSA is bounded on the north by Tonto National Forest, on the west by state land, and on the south and east by roads.

**NATURALNESS.** White Canyon WSA is a small, rugged portion of the Mineral Mountains with a segment of its outwash plain to the south. Numerous and varied rock outcrops, erosional features, layering and color are found in all of the WSA's washes and canyons. About three miles of the five-mile-long White Canyon lies within the WSA, displaying up to 800 feet of vertical wall. White Canyon varies from a narrow to a wide canyon with the floor alternately showing sandy, rocky or slickrock surfaces. Dense growth of willow and desert shrub line the canyon and pools of water are common.

The Rincon, a major topographic feature, is a large amphitheater towering 600 to 1,000 feet above the WSA's southern outwash plain. Elevations vary from a low of 1,900 feet in the south to a high of 4,053 feet in the north, with precipitous cliffs throughout.

Vegetation includes plants found both in the Upper and Lower Sonoran life zones. Paloverde and saguaro dot the hills; desert grasses and chaparral species cover the mesas and uplands; with desert scrub, walnut and willow lining the washes and canyons.

Human imprints in the WSA include four livestock spring developments and nine miles of vehicle way in the east and south portions of the WSA. These ways vary from barely discernible tracks to once constructed but not presently maintained ways. Most of these vehicle ways follow washes or canyon bottoms and are largely unnoticeable. Some segments, however, were constructed along hillsides and are often visible from certain areas within the WSA. These vehicle ways lessen the natural character of the WSA in these areas, particularly in several canyons along the WSA's eastern boundary.

Some outside human impacts affect the WSA's natural character. Portions of the road forming the area's southeastern boundary and the mines near Copper Butte are easily visible from most higher elevations in the WSA, detracting from the area's natural appearance. However, visitors can escape these impacts in the confines of the WSA's many canyons and washes.

**SOLITUDE.** White Canyon WSA offers outstanding opportunities for solitude, but because of the WSA's small size only a limited number of visitors could be accommodated. Rugged topography and dense plant growth provide visitors with some opportunities to avoid the sights, sounds and evidence of others. Solitude opportunities are best in the plant-covered bottoms of White Canyon and other small arroyos and washes. Opportunities for solitude outside the canyon bottoms are less than outstanding because

of the open aspect of the flat top mesas and the noticeable roads and mines outside the WSA. Increased numbers of individual hikers or the presence of one or two groups would greatly reduce opportunities for solitude because of the WSA's small size and the likely concentration of visitors in White Canyon and along natural travel corridors atop flattop mesas. Solitude opportunities are also affected along the eastern and southern areas of the WSA because mining, and the sights and sounds of traffic are noticeable.

**PRIMITIVE AND UNCONFINED RECREATION.** The WSA's primitive recreation opportunities are confined by its relatively small size, with little opportunity for extensive backcountry travel, as visitors can easily see the entire WSA in one or two days.

**SPECIAL FEATURE.** Scenic values enhance the WSA's wilderness values. Rugged terrain, precipitous cliffs, colorful rock formations and a variety of plants combine to create an area of scenic interest. In addition, the WSA contains several significant cultural sites.

### Mineral and Energy Resources

Volcanism, tectonic activity, erosions and intrusions have created the WSAs present day topography. The 1982 GEM report shows the entire WSA (6,968 acres) with moderate mineral potential (see Map 3-3).



*Winter rainstorms create numerous short-lived waterfalls in White Canyon WSA.*

The exposures of 1.7 billion year old Pinal Schist show sulfide mineralization in several areas. The area of most visible significant copper mineral exposure is in the north part of the WSA in T. 4 S., R. 12 E., section 4. Drilling in the southeastern part has proven even greater copper values at depth.

There are two distinct types of copper mineralization in the area — the exotic oxide copper in the Whitetail Formation in the northerly areas and the sulfide-oxide copper in the Pinal Schist to the south. The complex (exotic) copper in the Whitetail Formation has gone thru several cycles of oxidation, leaching, mobilization and redeposition. The original primary copper minerals were part of a sulfide system within the district. The system probably had the Pinal Schist as the main host rock.

Drilling has discovered anomalous deposits of copper in the southeast part of the WSA, primarily concentrated in the Whitetail Formation. A deep drilling program is required to discover and delineate the major sulfide body target from which this disseminated copper originated. Drill hole information at present indicates a world class porphyry copper mine, with a high probability of molybdenum, silver and gold as secondary minerals.

## Recreation Uses

Hunting, hiking and off-road vehicle-related use are the major recreation activities in the White Canyon WSA. Deer, javelina, quail and small game hunting is available. Because of the area's ruggedness, ORV use is restricted to nine miles of existing vehicle ways. Existing visitor use and projected visitor use are shown in Table 4-1.

## Wildlife Values

White Canyon WSA has approximately three miles of intermittent perennial stream and associated riparian habitat. This type of habitat is the most productive wildlife habitat in Arizona. This WSA's 50 acres of riparian habitat support a rich assemblage of species, including nongame, small game, big game and special status species. Most wildlife species are at least partially dependent on the riparian habitat.

The WSA provides crucial riparian habitat for five special status species: transient peregrine falcons (Endangered), Gilbert's skinks (Candidate Category 2), breeding zone-tailed hawks (BLM-Sensitive), breeding and wintering Cooper's hawks (BLM-Sensitive), and wintering sharp-shinned hawks (BLM-Sensitive).

The Arizona Game and Fish Department (AG&FD) has identified habitat to the north of the WSA as having a high potential for the introduction of desert bighorn sheep. An introduced population of desert bighorns would move outward into the WSA, which is about 80 percent suitable bighorn habitat. One of the planned actions in the BLM/Arizona Game and Fish Department (AG&FD) Coordinated Middle Gila Habitat Management Plan is for BLM to assist the AG&FD in the evaluation of habitat suitable for the release of bighorns.

## Cultural Resources

Three sites in the White Canyon WSA possess the characteristics necessary for eligibility to the *National Register of Historic Places*. These include two rock shelters and a prehistoric tool production center.

Hankat Cave is an Archaic Period (5000 — 1000 BC) habitation with a later historic Yavapai occupation. Unique assemblages of projectile points and a large inventory of distinctive Archaic groundstone have been recovered from this cave. Another site in the vicinity of Hankat Cave is a Salado culture cave habitation, dating to 1800 A.D.

The Hama'ca Site is a large lithic tool manufacturing site. It is believed to be a major source for Archaic populations that were utilizing the area.

## Economics

BLM specialists identified an area surrounding the EIS area in which residents might be economically impacted by wilderness designation. Named the economic study area (ESA), this area includes Mohave, Maricopa, Pima, Pinal, and Yavapai Counties, Arizona.

In 1982, 1.02 million persons were employed in the ESA, representing 85 percent of Arizona's total employment of 1.20 million. Employment is heavily dependent on the economies of Phoenix and Tucson in Maricopa and Pima Counties, which provides 93 percent of the total employment in the ESA.

An analysis of the ESA's 1982 employment shows that the mining sector employs 12,000 persons and represents only one percent of the total employment in the ESA. However, mining is a large employer in Pinal County with 5,600 employees or 18 percent of the county's total. In the other four ESA counties, mining employment ranges from only one percent to five percent of each county's total employment (see Appendix I, Table 7).

In 1982, earnings in the ESA amounted to \$17.3 billion, representing 87 percent of the state's total employment earnings of \$19.9 billion. Earnings in Maricopa and Pima Counties represent 94 percent of the total 1982 earnings in the ESA. Earnings from employment in the mining sector were most important in Pinal County, where mining represented 34 percent of the total county earnings, followed by Yavapai County where 9 percent of the total county's earnings were mining-related. The 1982 total earnings from various employment sectors in the ESA are shown in Appendix I, Table 8.

## PICACHO MOUNTAINS (AZ-020-194) — 6,400 Acres

### Wilderness Values

**LOCATION AND BOUNDARIES.** The Picacho Mountains WSA (Map 2-4) is one of south-central Arizona's dominant landforms. The WSA lies in southern Pinal



*Being in the center of an extensive valley and flats, the Picacho Mountains WSA's ridgeline offers visitors vistas of southern Arizona's ranges and valleys.*

County, 10 miles east of Eloy and Picacho, Arizona. The unit is bounded on all sides by state lands and is a rectangular shape (two miles wide and five miles long).

**NATURALNESS.** Picacho Mountains WSA includes the northern portion of the Picacho Mountains, a small north-south trending granitic range rising 2,500 feet from the desert floor to an elevation of 4,508 feet. The WSA's south and southwest escarpments offer rugged mountain scenery of steep canyons with spires and sheer rock faces. The east and north areas feature open canyons and steep rises to the main ridgeline.

The unit lies within the Lower Sonoran life zone and paloverde-saguaro is the dominant plant community. A dense stand of saguaro is featured on the WSA's east side, and desert wash vegetation with several chaparral species grows in the canyons. Plant growth on the mountain uplands and ridgeline is sparse, primarily desert grasses and low growing paloverde.

Human imprints within the unit include 1.3 miles of vehicle ways, a prospect, and two wildlife water catchments. These impacts are inconspicuous because they are screened by rugged topography.

Outside human impacts and activity influence the WSA's natural character. These include the visible and audible traffic on Interstate 10, the Southern Pacific Rail-

road, and nearby citrus groves and cropland, a state park, a gravel pit, and the small communities of Eloy and Picacho. The Central Arizona Project's (CAP) large concrete aqueduct, flood control structures, pumping stations, maintenance road, and a powerline will run along the unit's west and south boundaries and will eventually affect the WSA's natural character. The CAP will greatly alter the landscape west of the unit is easily seen by visitors to the WSA.

**SOLITUDE.** Several factors contribute to the WSA's opportunities for solitude. Steep rugged canyons, broken by spires and jumbles of rocks, provide some opportunities for recreationists to separate themselves from others in the WSA. The five-mile long ridgeline that varies in height from 4,508 to 3,500 feet also helps separate users from one another. Vegetation along the canyons and the east side provides good screening.

Solitude opportunities in this WSA are affected by outside human activity and the area's size. The area's steep terrain requires visitors to use the Newman Peak Trail and to a lesser extent canyons and ridgelines. This channeling effect, coupled with the area's relatively small size, would result in increased visitor contacts and loss of solitude opportunities. Moreover, the dual lanes of traffic along Interstate Highway 10, nearby agricultural lands and the Central Arizona Project with its auxiliary facilities would lessen a visitor's solitude experience.

**PRIMITIVE AND UNCONFINED RECREATION.**

Picacho Mountains WSA offers visitors a wide variety of recreational activities. Hiking opportunities are enhanced by the rugged terrain and the sharp rise of peaks and ridges. The WSA, however, offers no opportunities for extensive backcountry travel.

**SPECIAL FEATURES.** The precipitous rise of the Picacho Mountains from the desert floor is highly scenic, both for travelers along Interstate Highway 10 and for visitors within the WSA. The WSA is also noted for its spring wildflower displays. The peak's location, in the center of an extensive valley, accentuates one's view of southern Arizona's peaks and ranges.

**Recreation Uses**

Hunting, hiking and rock collecting are the major recreation uses in this WSA, with some ORV use along the WSA's 1.3 miles of vehicle ways. Precipitous terrain restricts most ORV activity to desert plain areas outside the WSA. Rock-hounders collect copper and chrysocolla in prospect areas. Legal access by recreationists may be a problem because the WSA is surrounded by state land.

**Land Uses**

Three rights-of-way have been granted for the WSA, two for solar-powered communication sites and one for an electrically powered communication facility with a powerline. Stipulations in each right-of-way require installation of the facilities by helicopter and other means in order to satisfy the nonimpairment criteria (*Interim Management Policy and Guidelines for Lands Under Wilderness Review, Appendix 2*) and require immediate removal if the WSA is designated as wilderness.

Newman Peak is highly desirable as a communications site according to the communication industry in Tucson and Phoenix. Governmental and industrial sources have indicated that Newman Peak can provide communication coverage for a large area, particularly in the Tucson-Phoenix corridor.

Public access across BLM lands is not available as this WSA is surrounded by state land. Construction of the CAP may further increase access problems since many of the more primitive jeep trails will not be bridged.

**Mineral and Energy Resources**

Rocks of the Picacho Mountain description extend NW-SE across Arizona and contain the major porphyry copper deposits of the state. Evidence exists that these mountains are tectonically a detachment fault system with the mountain chain originating to the westward in the area of the Waterman-Silver Bell Mountains.

Copper mineralization is evident in the mountains by three prospects showing copper mineralization. To the east just outside the WSA, the Golden Bell Mine produces

copper, gold and silver. To the northeast, again just outside the WSA in Guild Wash, the North Star Mine processes precious metals, copper and some manganese. The mylonitized low angle fault these two mines are located on crosses the southeast corner of the WSA through, sec. 26, T. 8 S., R. 9 E. Geologic inference indicates this area to have a high mineralized potential. Several drill holes in the area surrounding these mountains have penetrated porphyry copper mineralization adequate to define as potential reserves. This ore body would require more drilling to define and an open pit mining process to be economic for copper.

The 1982 GEM report indicates that the WSA has 5,900 acres with a moderate mineral potential. Local information classifies approximately 500 acres as high potential (see Map 3-4).

**Wildlife Values**

The Arizona Game and Fish Department has identified the Picacho Mountains as having a high potential for the introduction of desert bighorn sheep (Bureau of Land Management 1982). The entire WSA provides suitable habitat for this Group 3 state-listed species.

**COYOTE MOUNTAINS**

(AZ-020-202) — 5,080 Acres

**Wilderness Values**

**LOCATION AND BOUNDARIES.** Coyote Mountains WSA lies in central Pima County, Arizona, 40 miles southwest of Tucson and four miles east of the Kitt Peak National Observatory (Map 2-5). The WSA is bounded on the north and west by the Tohono O'odham Indian Reservation and on the east and south by state and private lands.

**NATURALNESS.** The Coyote Mountains rise 3,500 feet in several sharp ridges from the western edge of the Altar Valley, reaching an elevation of 6,530 feet. Composed of rugged gneiss and granite, the mountains have massive rock faces, rounded bluffs, rugged peaks and cliffs that are cut by the large open Mendoza Canyon. When observed from the surrounding valley terrain, the Coyotes dominate the landscape.

The unit's 3,500-foot change in elevation permits representation of both the Upper and Lower Sonoran life zones, including a paloverde-saguaro community and an interior chaparral community. An oak community occupies the highest elevations and riparian desertscrub communities are found within the major canyons.

The WSA is in a largely natural condition. Human imprints include the Bonanza Mine, its access route, hand-built stock trails and several spring developments.

The Bonanza Mine, in T. 16 S., R. 8 E., sec. 26, consists of five shafts and their tailings into the hillside, varying from a few to 50 feet deep. The mine and its access route are largely unobtrusive when observed from most of the WSA,



*Higher elevations of the Coyote Mountains are characterized by rugged outcrops. Arizona white oak, Mexican pinyon, and native grasses cover the crest of the range.*

and the disturbances are rehabilitating through weathering and revegetation.

Access is by foot or horseback to the range developments, eight developed springs, one reservoir, stock trails and several miles of fence. Twenty miles of hand-built stock trails cross T. 16 S., R. 8 E., sections 25, 26, and 27, but the stock trails are overgrown with grass and are weathered. The developments do not greatly affect the WSA's natural character.

**SOLITUDE.** The WSA's rugged topography and chaparral vegetation combine to screen the influence of man from visitors and provide opportunities for visitors to separate themselves from each other. Solitude opportunities are limited by several factors, particularly if visitor use to the area increases. The unit's small size and steep topography channels visitors along the major drainages or ridgelines, resulting in increased visitor contacts and decreased opportunities for solitude. In addition, the white domes of the Kitt Peak National Observatory and nearby highways could detract from a visitor's experience of solitude.

**PRIMITIVE AND UNCONFINED RECREATION.** Coyote Mountains WSA provides diverse primitive recreational opportunities due to its scenic, geologic and botanical values. The cliffs, dry waterfalls, steep canyons, plant-lined washes and exfoliating granite domes are attractive

to the primitive recreationist. Day hiking opportunities include steep and precarious climbs up narrow gorges and dry waterfalls. Artists and photographers frequent the area to capture its scenery. Rock collectors are attracted to the area because rare mineral specimens may be found. Hunting opportunities are good due to the abundance of big and small game, including deer and javelina.

The unit's recreation opportunities are limited, however, by its small size. The WSA offers no opportunities for extensive backcountry travel. State, private, and Tohono O'odham Reservation lands next to the WSA create access restrictions.

**SPECIAL FEATURES.** Scenic, archaeological and wildlife features enhance the WSA's wilderness values. Archaeological remains of prehistoric Indians, including petroglyph sites, lie within the unit. The area provides important whitetail deer and bighorn sheep habitat.

### Mineral and Energy Resources

The Bonanza Mine in Coyote Mountain is a heat-induced (pyrometomatic) deposit in metamorphosed limestone. The mine itself is a meta-limestone. Various copper-bearing minerals, scheelite (tungsten) and minor gold and silver are reported to have been on the ore. On the west side of the WSA in section 26, T. 16 S., R. 8 E., there are several old



mineral and prospects. Old reports indicate that copper-silver ore was shipped from these mines during World War I. Molybdenite is reported to be exposed in the mine wall rock.

An unpublished thesis at the University of Arizona by G.M. Myers (1984) indicates that there is a highly favorable 640-acre area of economic scheelite in the area of the Bonanza Mine in the Coyote Mountains. Free milling gold is reported in the numerous quartz veins outcropping throughout the area. Minerals such as beryl, niobium, columbite, tantalite, samarskite and lithium have a high potential existence in Mesozoic pegmatites which outcrop in the WSA. There is a recent and developing interest in Arizona pegmatite as the market demand for exotic minerals increases in local high technology industries.

The 1982 GEM report indicates that 3,640 acres of this WSA have a moderate mineral potential. Map 3-5 shows areas in the WSA with a high or moderate mineral potential.

## Recreation Uses

In 1967 a BLM Retention Classification Order called for multiple use management in the Coyote Mountains and recognized the area as the Coyote Mountain Natural Area. Rock climbers, hikers, rockhounds, hunters and backpackers use the WSA. ORV use is very limited because of the area's rugged topography and the less than one mile of nearly impassable vehicle ways.

Legal access can be restricted since recreationists must cross state, private or Tohono O'odham Indian Reservation lands to reach the WSA. Such lands may not be open to unrestricted access. Access across private and Reservation lands may require landowner and tribal permission. Locked gates, fences and no trespassing signs may be encountered.

## BABOQUIVARI PEAK (AZ-020-203B) — 2,065 Acres

### Wilderness Values

**LOCATION AND BOUNDARIES.** Baboquivari Peak WSA is 50 miles southwest of Tucson, Arizona in Pima County (Map 2-6). The unit is bounded by the Tohono O'odham Indian Reservation on the west, state land on the north and east, and state and private land on the south. The east side of the peak is BLM administered. The narrow finger-shaped WSA is 5.5 miles long (north to south) and generally less than a mile wide.

**NATURALNESS.** Baboquivari Peak is the highest point and most dramatic scenic feature in the Baboquivari Range. The peak rises to 7,730 feet and towers more than 1,000 feet above adjacent ridges. Baboquivari Peak's massive granite spire is a visible, notable and unique landmark in southern Arizona.

Within the WSA are several vegetation communities representing Upper and Lower Sonoran life zones. Rising

from the Altar Valley, palo-verde-saguaro communities with some mesquite blend into an interior chaparral community. Higher elevations are dominated by a community of Arizona white oak and Mexican pinyon. Throughout the range are found a mix of oak, pinyon, walnut and several chaparral species.

Human imprints in the WSA include dispersed debris from a wooden lookout tower and wooden stairway on Baboquivari Peak. These remains have blown down along the south and east sides of the peak where the tower and stairway were built by the Civilian Conservation Corps in 1933. Occasional bolts and slings have been driven into the face of the mountain by climbers, but these are rarely seen.

**SOLITUDE.** Opportunities for solitude are outstanding within the WSA. In spite of its small size, the complexity of the range, the dense vegetation and the many rock outcrops serve both to disperse recreationists and effectively screen them from others in the vicinity. In addition, the range's inaccessibility and the difficult climbs needed to reach the ridge line tend to limit visitors.

Solitude opportunities would be compromised if several individuals or parties attempt to climb the peak at the same time. Groups of up to 20 people have been known to visit the WSA on occasion (Bingham, Brooks, Clabby, Groves, Jablonski and Smith 1983). Current visitor use is, however, evenly distributed throughout the year, and visitors' encounters should continue to be infrequent.

**PRIMITIVE AND UNCONFINED RECREATION.** Baboquivari Peak attracts sightseers and naturalists and is one of the most popular technical rock climbing sites in the southeastern part of Arizona.

The WSA provides opportunities for less skilled climbers to ascend Baboquivari's northwest face or simply to hike the range crest. Hiking and camping along the crest or in the side canyons could easily require a several-day trip.

**SPECIAL FEATURES.** Scenic, geologic, ecological, historic and cultural values enhance the WSA's wilderness values. Rugged granite outcrops, dikes and plugs provide geologic interest. Moreover, Baboquivari Peak has high ethno-religious value because it is a sacred mountain to the Tohono O'odham Indians.

## Mineral and Energy Resources

Not enough information is available to evaluate whether Baboquivari Peak's north-south trending fault zone is mineralized. The youngest rocks in the WSA area are potentially beryl-scheelite bearing pegmatites which outcrop in the northern reaches of the WSA.

One unnamed silver and gold occurrence on record is in the central western part in section 12, T. 19 S., R. 7 E. No production figures are known. Several claims for beryl are just outside the northern end of the area in some of the outcropping pegmatites. No exploration or examination of those pegmatites is on record for the exotic suite of

minerals potentially in place in the feldspars. These minerals are beryl, niobium, columbite, tantalite, samarskite, lithium and possibly tourmaline. There is a recent and developing interest in Arizona pegmatite outcrops as the market demands increase for their utilization in the local high technology industries.

The 1982 GEM report identifies all 2,065 acres in the WSA as having moderate mineral potential (See Map 3-6).

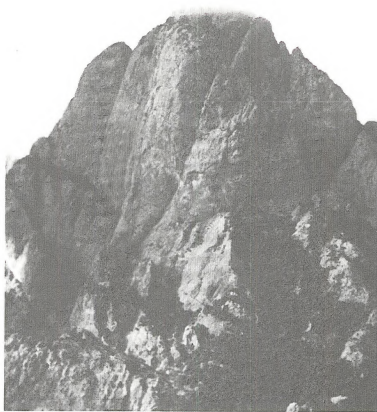
### Recreation Uses

Baboquivari Peak is recognized as the best and most difficult technical rock climbing site in Arizona and is the state's only multi-day technical climb. Hiking, camping, rock collecting, nature study, photography, sightseeing

and hunting are other major recreation uses of the area. An abundance of dove and quail make the WSA a good small game area.

In 1969, a BLM Retention Classification Order called for multiple use management on Baboquivari Peak and recognized the area's ecological and archaeological values, scenic beauty and outdoor recreation resources.

Visitors must cross state, private or Tohono O'Odham Indian lands to reach this WSA, and such lands are not open to unrestricted access. No vehicular access is available. Limited pedestrian access is across a private ranch in Thomas Canyon, but recreationists must use private or state land for parking on a trailhead/staging area. A trail goes to the west side of Baboquivari Peak across Tohono O'Odham Reservation lands, but tribal permission may be needed before utilizing this route.



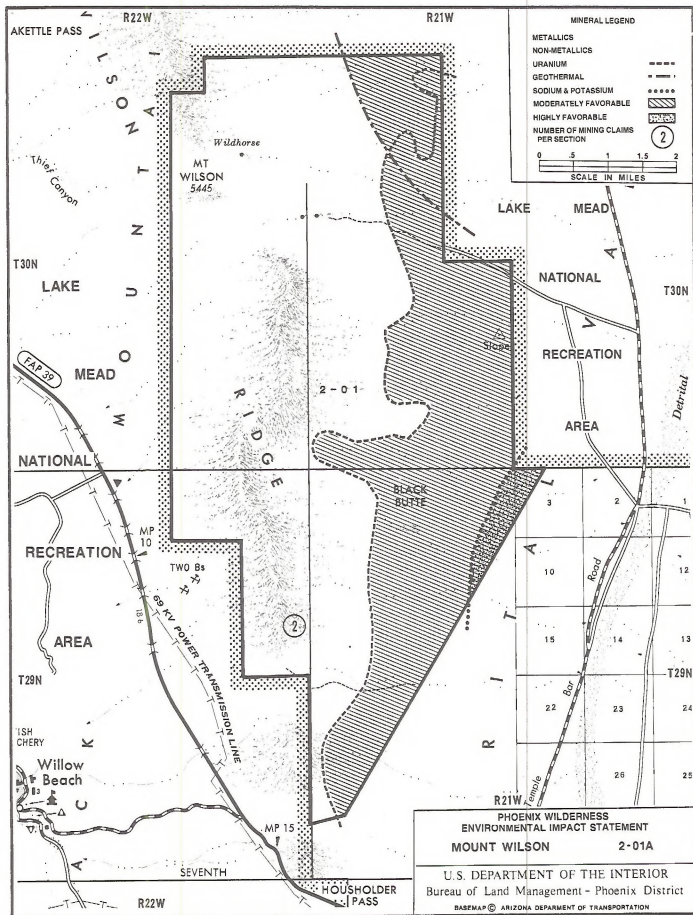
*Baboquivari Peak (pictured above with its summit obscured by winter clouds) has important social and religious significance to the Papago Tribe.*

# **MINERAL FAVORABILITY AND MINING CLAIMS**

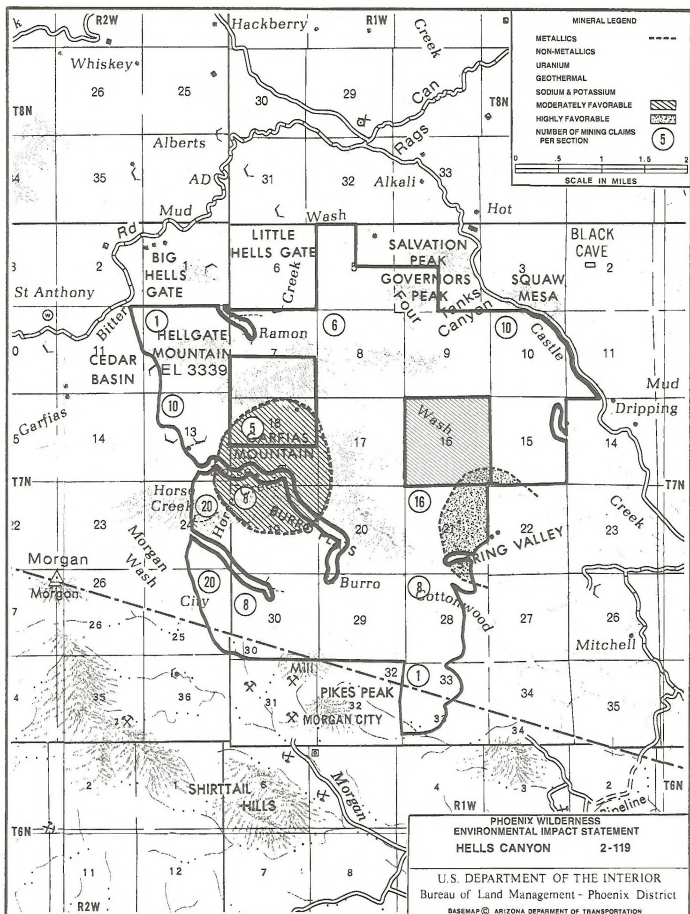
<b>MAP NUMBER</b>	<b>WILDERNESS STUDY AREA</b>
3-1	MOUNT WILSON
3-2	HELLS CANYON
3-3	WHITE CANYON
3-4	PICACHO MOUNTAINS
3-5	COYOTE MOUNTAINS
3-6	BABOQUIVARI PEAK



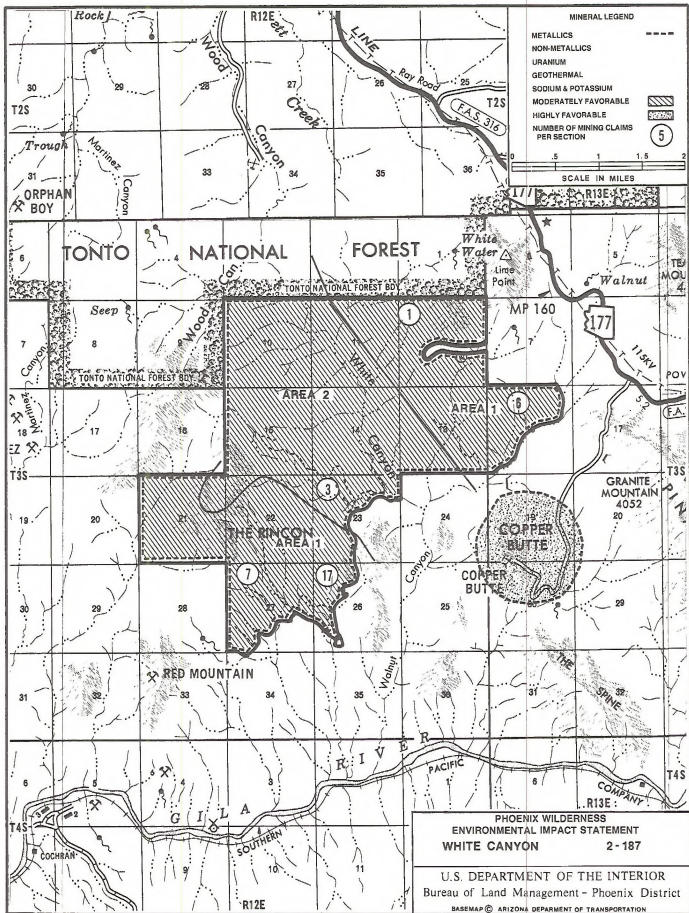
MAP 3-1



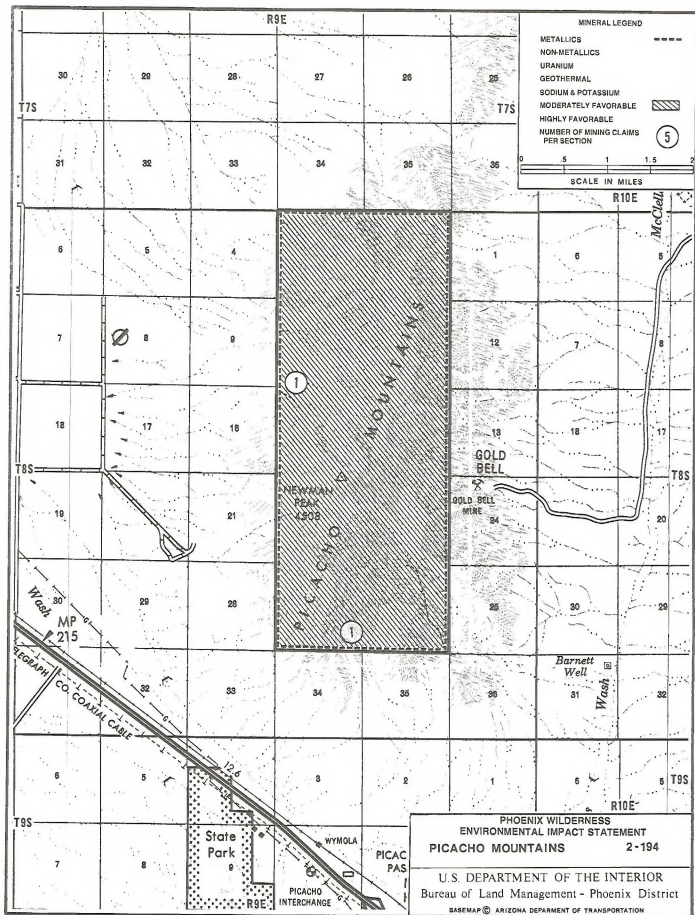
MAP 3-2



MAP 3-3

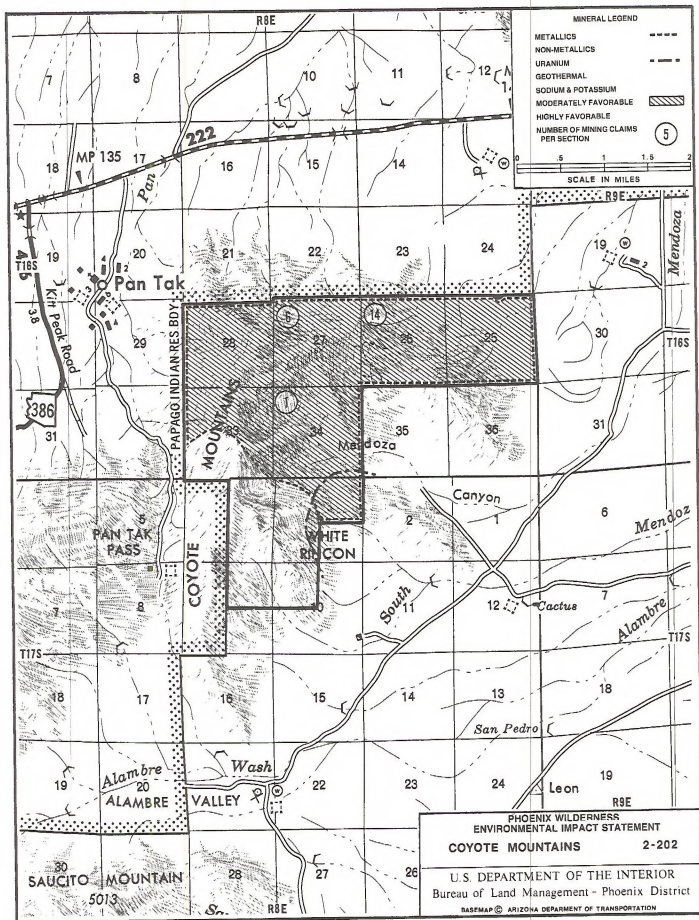


MAP 3-4

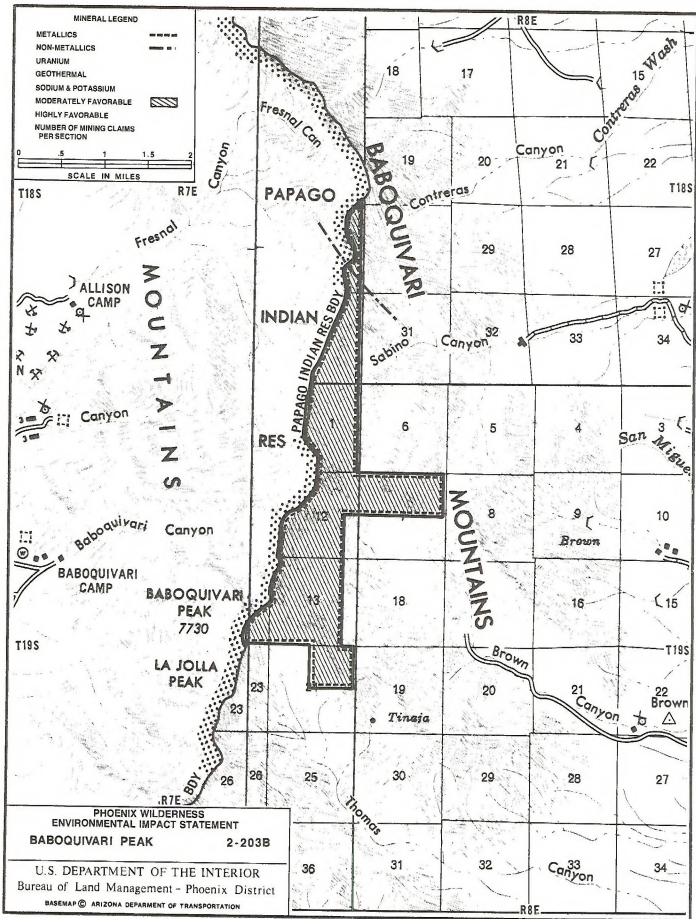




MAP 3-5



MAP 3-6



# **Chapter 4**

## **ENVIRONMENTAL CONSEQUENCES**



# CHAPTER 4

## ENVIRONMENTAL CONSEQUENCES

### INTRODUCTION

Chapter 4 analyzes the environmental consequences of the alternatives for each WSA. Each analysis will be commensurate with the degree of expected impact. BLM determined that no measurable impacts would occur to livestock operations, wild burros, air quality, water quality, protected plant species, nonfederal lands, soils, social elements and military overflights. These components are, therefore, not discussed in this chapter (see Chapter 1 — Issues Considered But Not Analyzed).

### BASIC ASSUMPTIONS

To provide a standard framework for impact analysis and comparison among the alternatives the following assumptions were used.

1. Short-term impacts are considered to be those which would occur over a five-year period after designation, while long-term impacts are those occurring more than five years after designation. Unless otherwise stated, all impacts are considered long-term.
2. BLM will have the funding and work force to implement the chosen alternative.
3. WSAs will be managed under BLM's Interim Management Policy until either designated as wilderness or released by Congress.
4. If an area is designated as wilderness, the Wilderness Management Policy and related wilderness management regulations will be used as guides for permissible activities until a Wilderness Management Plan is prepared for a designated area. The WSA-specific Wilderness Management Plan will identify management actions that will be authorized within each designated area.
5. BLM cannot block access to nonfederal mineral or privately owned lands within a designated wilderness area.
6. Effective on the date of designation, any area designated as wilderness will be withdrawn from mineral leasing and mining claim staking under the mining laws. This provision is subject to valid existing rights.
7. Range facilities will be maintained by customary methods, and new rangeland developments may be allowed when site-specific environmental assessments show wilderness resources would not be impaired.
8. Livestock grazing will be maintained at present levels unless adjusted for reasons prescribed through range management practices.
9. Traditional forms of wildlife habitat improvement projects used in the Phoenix District would continue to be installed in designated areas if, through an environmental assessment, it is determined that the projects comply with the intent of wilderness legislation.

10. Mining activity and rights-of-way construction would impair a visitor's perception of naturalness on a larger area than is actually disturbed. This larger area is generally the total area within viewing distance of the particular impairing activity. Thus, a two-acre mine might be viewed from the surrounding hills, thereby impairing a visitor's perception of naturalness across a much larger area.

### MOUNT WILSON—WSA 2-01 (Map 2-1)

#### PROPOSED ACTION (ALL WILDERNESS)

All of the Mount Wilson WSA's 24,821 acres would be designated as wilderness under the *Proposed Action*.

#### Impacts on Wilderness Values

Wilderness designation would provide legislative protection to the entire WSA. Specifically, designation would preclude the development of a small gold, silver and uranium mine and all exploration programs within the WSA. This preclusion would preserve the scenic vistas of Wilson Ridge, naturalness on 12 acres, the perception of naturalness and solitude opportunities on 360 acres — values that would otherwise be impacted by the sights and sounds of mining.

An estimated 400 visitor use days/year of motorized recreation use would be eliminated from the WSA by wilderness designation. Although encounters between ORV users are infrequent under current levels of use, the elimination of ORV use would occasionally benefit the wilderness value of solitude because wilderness visitors would not see or hear ORV users in the area.

**Conclusion:** Wilderness designation would maintain the WSA's wilderness values by precluding mining and motorized vehicles. Although designation would prevent impacts to the WSA's natural character on only one percent of the WSA, the impacts would be prevented in a particularly scenic area.

#### Impacts on Mineral Development

Wilderness designation would withdraw all 24,821 acres of public land from all forms of commercial mineral entry except for valid existing rights at the time of designation. This WSA includes 5,640 acres highly favorable for metallic minerals (gold, silver), 640 acres highly favorable for sodium deposits, 10,000 acres moderately favorable for uranium and 750 acres moderately favorable for geothermal development (1982 GEM Report).

Historical and recent mining activity indicates the probability that commercial quantities of economic minerals

exist within this WSA. This is based on exploration, drilling, sampling, geologic inference and historic records. No records or estimates of reserve quantities or assay values are available. It is assumed, however, that commercial development of one small scale underground mine would be precluded by wilderness designation. In addition, an exploration program consisting of 15-20 drill holes would not be allowed.

**Conclusion:** Designation would prevent development of one small scale gold and silver mine. In addition, a small scale exploration program to identify low grade ore deposits would be precluded by designation.

### Impacts on Recreation Use

Designation would prohibit motorized recreation on 4.25 miles of vehicle ways and all 24,821 acres of the WSA. Long-term motorized use would, therefore, be 400 visitor days/year fewer than under nondesignation. Long-term nonmotorized use would be 400 visitor days/year more

than under nondesignation. Projected total use days/year would be the same whether the WSA is or is not designated. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the Mount Wilson WSA. See Table 3-3.

**Conclusion:** Designation would not affect the amount of use but would change the use from a mix of nonmotorized and motorized use to all nonmotorized.

### Impacts on Wildlife

Wilderness designation would ensure that 900 acres of crucial desert bighorn sheep habitat, which is being slowly encroached upon by mining and ORV use, would not be disturbed. All 24,821 acres of crucial bighorn sheep habitat would be legislatively protected and remain available for yearlong use by rams and seasonal use by ewes and lambs.

**Conclusion:** Designation would preserve 900 acres of crucial bighorn sheep habitat that would otherwise be lost.



*Wilderness designation of Mount Wilson would provide additional protection to 24,800 acres of crucial bighorn sheep habitat.*

## NO WILDERNESS

None of the Mount Wilson WSA's 24,821 acres would be designated as wilderness under this alternative.

### Impacts on Wilderness Values

None of the Mount Wilson WSA's wilderness values would receive the special legislative protection provided by wilderness designation.

Over the long term, five acres of disturbance would result from developing a mine in the rugged canyon country northeast of the existing Two B's Mine. One mile of road would be constructed to provide access. The wilderness value of naturalness would be impaired on five acres and the perception of naturalness would be lost over a larger area totaling 360 acres. Although the surface disturbances caused by mining would be highly noticeable from parts of the WSA, the mine site is screened by Wilson Ridge from most of the WSA. Activities associated with this mineral development would impair the wilderness value of solitude on 360 acres.

Surface disturbances caused by the mine would slightly impair scenic vistas of Wilson Ridge available to motorists traveling Highway 93. However, most mining activity is screened from the highway by terrain features.

A drilling exploration program along the WSA's eastern boundary (near the powerline) would impair the natural character of seven acres over the short term. No long-term impacts are anticipated from this exploration program. About 80 percent of drill pad clearing and access development would occur along washbottoms and similar drainage areas. Such disturbance would be reclaimed by weathering. The drill pads and access developed outside the wash areas would be longer lasting disturbances but, due to their small scale, would not be noticeable. During the period of drilling activity, solitude opportunities would be lost on 600 acres.

The sights and sounds of recreational off-road vehicle use would impact solitude. However, this impact would be low since motorized recreation use would only amount to 400 visitor use days yearly and be restricted to 4.25 miles of existing vehicle trail.

**Conclusion:** Nondesignation would allow activities that would impair the WSA's wilderness values on 360 acres, representing one percent of the WSA. Solitude opportunities would occasionally be impacted by off-road vehicles on the outer perimeter of the WSA where off-road travel is feasible.

### Impacts on Mineral Development

All lands within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws and other pertinent laws and regulations. This includes 5,640 acres highly favorable for metallic minerals, 640 acres highly favorable for nonmetallic min-

erals, 10,000 acres moderately favorable for uranium and 750 acres moderately favorable for geothermal development.

With nondesignation, anticipated exploration and development programs would be allowed. Development of one small underground precious metals mine is expected. Additional exploratory drilling programs seeking low grade ore would also be permitted.

**Conclusion:** Nondesignation would allow development of one small scale gold mine and one small scale exploration program for low grade ore.

### Impacts on Recreation Use

Under nondesignation, current recreation uses would continue—projections are for 400 motorized and 400 non-motorized days/year over the long term. See Table 3-3.

**Conclusion:** Current recreation uses would continue and visitor days/year would increase to a total of 800.

### Impacts on Wildlife

Under the *No Wilderness* alternative, mineral exploration and development would result in the physical loss of five acres of crucial desert bighorn sheep habitat and would cause desert bighorn sheep to avoid 900 acres of crucial habitat surrounding the mine. This loss of four percent of the WSA's crucial habitat would not affect the WSA's bighorn sheep population because remaining habitat is adequate to sustain current bighorn populations.

**Conclusion:** Nondesignation would allow activities that would reduce the WSA's bighorn sheep habitat by 900 acres. This loss would not affect the current sheep population but would slightly affect the population's potential to increase beyond existing levels.

## HELLS CANYON—WSA 2-119 (Map 2-2)

### PROPOSED ACTION (NO WILDERNESS)

None of the Hells Canyon WSA's 9,379 acres would be designated as wilderness under the *Proposed Action*.

### Impacts on Wilderness Values

None of the WSA would receive the legislative protection provided by wilderness designation. Continued multiple-use development of the area would be expected.

Three acres would lose their naturalness because of surface disturbance from an exploration program for lead and silver deposits in T. 7 N., R. 1 W., sec. 21, SE $\frac{1}{4}$ . The mine, tailings, access, as well as the sights and sounds of mining

activity, would be visible and audible from surrounding areas, thus impairing solitude and the perception of naturalness on 240 acres.

In T. 7 N., R. 1 W., sec. 18, extension of existing roads, drilling operations and a small underground gold and silver mine would disturb three acres and impair their natural character. Solitude and the perception of naturalness would be impaired on 300 acres by the sights and sounds of mining activity and the visible mine, tailings and access.

Exploration activity by small operators would continue, with localized discoveries likely and small scale production facilities probable, thus impairing the wilderness value of naturalness. Cumulative impacts to naturalness from these ventures cannot be quantified in acres, but the overall impact is not considered to be significant over the long term.

Sights and sounds from recreational motorized vehicle use would occasionally disturb solitude. However, this impact is expected to be slight since ORV use would only amount to about 300 visitor use days annually.

**Conclusion:** Nondesignation would allow activities that would result in the loss of wilderness values in two areas within the WSA. The natural character of about six percent of the WSA would be impaired. Without designation ORV use would occasionally impair solitude opportunities throughout the WSA.

### Impacts on Mineral Development

All the WSA would remain open for mineral exploration and development, including 400 acres considered to have high metallic mineral potential (gold, silver, zinc, lead and copper) and 1,000 acres with moderate metallic potential (copper and silver). The development of two small underground silver, gold and lead mines would be allowed.

**Conclusion:** Nondesignation would leave 400 acres with high mineral potential open for exploration and development. In addition, one small scale gold and silver mining operation that would be precluded by designation would be allowed.

### Impacts on Recreation Use

Under nondesignation current recreation uses would continue—projections are for approximate tripling of the present use to 300 motorized and 1,200 nonmotorized days/year over the long term. No visitor facilities or other recreation development activities are anticipated within the WSA. See Table 3-3.

**Conclusion:** Under nondesignation current recreation uses would continue and such use would increase to a combined total of 1,600 visitor days/year.

### Impacts on Cultural Resources

Road construction within the WSA would allow for increased motorized recreation. Increased site vandalism, a frequent agent of deterioration of cultural resources, would result from this improved access, development and visitation.

The known significant (*Natural Register* eligible) cultural resource property in the WSA would be in jeopardy of indirect impacts from mining and recreation. Road building, vandalism and recreational vehicular traffic would pose a threat to the cultural site.

**Conclusion:** Improved access from mining activities and the resultant increased recreation use would result in increased vandalism to the large prehistoric village in the WSA. This increased vandalism would eventually lead to total site destruction.

### ALL WILDERNESS

All 9,379 acres of the Hells Canyon WSA would be designated as wilderness under the *All Wilderness* alternative.

### Impacts on Wilderness Values

All 9,379 acres of the WSA would be protected by legislative mandate. However, a small group of mining claims in the WSA with valid existing rights would be developed in a manner affecting wilderness values.

Wilderness designation would prevent the development of a drilling program and a gold-silver mine in T. 7 N., R. 1 W., sec. 18, S½. Benefiting from this action would be the wilderness value of naturalness on three acres and the perception of naturalness and solitude on 300 acres that would otherwise be impacted by mineral activity.

One exploration venture and mine on mining claims with valid existing rights is anticipated in T. 7 N., R. 1 W., sec. 21, S¼. Exploration and mining activities would disturb the perception of naturalness and solitude on 240 acres. This mine is, however, on the edge and the effects of mining do not extend into the remainder of the WSA.

Eliminating about 300 visitor days annually of motorized recreation use would benefit the wilderness value of solitude because other visitors would not meet or hear ORV users in the area.

**Conclusion:** Wilderness designation would maintain the values of naturalness and solitude across 97 percent of the WSA. Mining on claims with valid existing rights would impair wilderness values on about three percent of the WSA's eastern boundary.



## Impacts on Mineral Development

Wilderness designation would withdraw all 9,379 acres of public land from all forms of mineral entry, except for valid existing rights at the time of designation. Lands withdrawn include 400 acres considered highly favorable for gold, zinc, silver, lead and copper resources and 1,000 acres with moderate copper and silver potential. An existing mine in T. 7 N., R. 1 W., sec. 21, assumed to have valid existing rights, would be allowed to continue operations. Commercial development of one small scale gold, silver and copper mine would be forgone; however, no records or estimates of reserve quantities or assay values are available.

**Conclusion:** Designation would prevent development of one small scale gold and silver mine and would withdraw 400 acres with a high mineral potential from development. An existing mining operation on the WSA's eastern border is assumed to have valid existing rights and would be allowed to continue under designation.

## Impacts on Recreation Use

Designation would prohibit motorized recreation on 1.7 miles of vehicle ways and all 9,379 acres of the WSA. Long-term motorized use would, therefore, be 300 visitor days/year fewer than under nondesignation. Long-term non-motorized use would be 400 visitor days/year more than under nondesignation. Projected total use days/year would be 100 more if the WSA is designated. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the Hells Canyon WSA. See Table 3-3.

**Conclusion:** Designation would affect the amount of use (an additional 100 days in the long term) and would change the use from a mix of nonmotorized and motorized use to all nonmotorized.

## Impacts on Cultural Resources

Designation would protect and preserve the WSA's cultural resources for scientific, educational and conservation purposes by prohibiting or restricting mining, road construction and motorized vehicles. Wilderness restrictions would help preserve the WSA's *National Register* eligible prehistoric village site by reducing vandalism and vehicular damage.

**Conclusion:** Designation would result in reduced vandalism to the WSA's *National Register* eligible cultural site and the site would remain intact for future generations.

## WHITE CANYON—WSA 2-187 (Map 2-3)

### PROPOSED ACTION (NO WILDERNESS)

None of White Canyon WSA's 6,968 acres would be designated as wilderness under the *Proposed Action*.

### Impacts on Wilderness Values

None of the White Canyon WSA's 6,968 acres would receive the legislative protection provided by wilderness designation. In the long term, wilderness values would experience adverse impacts due to extensive exploration and mining of a known copper deposit.

Four sections of the WSA (T. 3 S., R. 12 E., secs. 22, 23, 26 and 27) are expected to undergo extensive mineral exploration, requiring construction of 50 quarter-acre drill sites and several spur roads each less than one-half mile long. A large scale open pit copper mine is expected to result from the exploration program. The copper mine would cause up to 640 acres of surface disturbance and would include construction of several miles of road. All four sections of the WSA initially explored would be adversely impacted. The wilderness value of naturalness would be lost on the 640 acres of the WSA expected to undergo mining and the perception of naturalness would be lost on 3,615 acres (52 percent of the WSA). Sights and sounds of the mining operation would extend across the entire 6,968 acres of the WSA, resulting in the loss of all solitude and primitive recreation opportunities.

Another exploration program is expected in T. 3 S., R. 12 E., secs. 13, 14 and 15. Drilling activity would extend into the White Canyon drainage and a major side wash of Walnut Canyon, disturbing naturalness on ten acres. The perception of naturalness, as well as solitude opportunities, would be impaired on the 700 acres overlooking the drilling ventures.

**Conclusion:** Nondesignation would result in the loss of wilderness values across 52 percent of the WSA. The loss of wilderness values on 52 percent of the WSA would leave an unimpaired area too small to be considered wilderness. Thus, large scale mineral development expected under nondesignation would result in the permanent loss of the WSA's wilderness character and would result in adverse impacts to the WSA's supplemental wildlife and archeological values.

### Impacts on Mineral Development

All lands within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws and other pertinent laws and regulations. Nondesignation would allow development of an extensive copper operation with secondary silver, gold and molybdenum in the WSA's south half. Additional exploratory activ-



*Hikers pass by rock formations in the White Canyon WSA.*

ity would proceed, unhindered by wilderness designation, in other portions of the WSA for precious metals.

**Conclusion:** Nondesignation would allow development of the WSA's extensive copper deposits. Development of these copper deposits is expected to result in a large scale copper mine described as world class. Development of this mine would provide needed jobs and income to the local economy. In addition, nondesignation would allow several other anticipated exploration programs to continue unhindered by wilderness restrictions.

### Impacts on Recreation Use

Nondesignation would result in a decrease in recreation use—from 300 to 200 nonmotorized and from 500 to 300 motorized visitor use days/year—because recreation opportunities would be adversely impacted by the sights and sounds of an open pit copper mine. See Table 3-3.

**Conclusion:** Under nondesignation motorized and nonmotorized recreation use would be reduced from a total of 800 visitor days/year at present to 500 because of copper mining activities. No recreation developments are planned.

### Impacts on Wildlife

With nondesignation, mineral exploration and development would result in the loss of 50 percent of the WSA's riparian habitat. The surface disturbance associated with mining would reduce the amount of crucial habitat available to five special-status species: peregrine falcon (Federal Endangered Species), Gilbert's skink, zone-tailed hawk, Cooper's hawk and sharp-shinned hawk.

The loss of riparian habitat would significantly affect the habitat's ability to support a rich assemblage of wildlife species, including special status species, nongame, small game, upland game and big game. The productivity of various populations, especially breeding birds, would decline with the loss of 50 percent of the riparian habitat.

Although no bighorn sheep live in the WSA, mineral exploration and development would reduce the amount of habitat suitable for desert bighorn sheep introductions from 5,680 acres to 3,120 acres.

**Conclusion:** Nondesignation would result in the loss of one-half the WSA's riparian habitat resulting in the loss of half the WSA's populations for five special-status wildlife species. In addition, the WSA would no longer be usable as a bighorn sheep reintroduction area.

## Impacts on Cultural Resources

Adverse impacts to the WSA's three *National Register* eligible cultural resource properties would occur under nondesignation. Nondesignation would allow mining and road construction, resulting in increased access. Improved access would lead to site damage from vehicles and vandalism, reducing the value of the WSA's cultural properties for further scientific study.

**Conclusion:** Nondesignation would allow actions that would result in increased vandalism to the WSA's three *National Register* eligible cultural resource properties. Under nondesignation these properties are expected to be vandalized to the point they are no longer of any historical value.

## Impacts on Economics

Nondesignation would allow development of a large scale copper mine within the WSA. Miners' incomes and mining company purchases would benefit local and regional economies (now depressed because other mines are closed or not operating at full capacity). The magnitude of these economic impacts cannot be estimated because the size of the mineral deposit is not known, although the porphyry copper deposits are considered to be world class.

**Conclusion:** Nondesignation would allow development of a world class copper mine within the WSA. World class copper mines generally employ more than 1,000 people (Parks — Personnel communication); therefore, development of this mine would greatly benefit local economies.

## ALL WILDERNESS

All 6,968 acres of the White Canyon WSA would be designated as wilderness under the *All Wilderness* alternative.

## Impacts on Wilderness Values

All wilderness values in the WSA would be protected by legislative mandate. Precluding all mineral developments in the WSA would maintain the wilderness value of naturalness on 650 acres, preserve the perception of naturalness and scenic character on 3,615 acres and sustain the quality of solitude and primitive recreation opportunities on all 6,968 acres of the WSA. Eliminating all motorized recreation use would benefit the wilderness value of solitude — wilderness visitors would not encounter or hear ORV users in the area.

**Conclusion:** Designation of the White Canyon WSA would preserve wilderness values across the entire WSA, values that are threatened by mineral development.

Designation would also prevent the loss of the WSA's supplemental wildlife and cultural values which are threatened by mining and human disturbances.

## Impacts on Mineral Development

Wilderness designation would withdraw 6,968 acres of public land from all forms of commercial mineral entry, except for valid existing rights. The entire WSA is considered to have moderate mineral potential. A large porphyry copper ore body in the southeast portion of the WSA would not be developed if the WSA were designated. No estimate of the reserve quantities that would be forgone is available, but copper, molybdenum and gold would not be produced. Exploration for other potential deposits of copper, gold, silver, zinc, lead, molybdenum, tungsten and manganese would cease.

**Conclusion:** Designation would prevent development of the WSA's extensive copper deposits which appear sufficient for large scale copper mining. Thus, designation would prevent development of a large scale mine with its associated beneficial economic impacts on locally depressed copper mining communities.

## Impacts on Recreation Use

Designation would prohibit motorized recreation on 9 miles of vehicle ways and all 6,968 acres of the WSA. Long-term motorized use would, therefore, be 200 visitor days/year fewer than under nondesignation. Long-term non-motorized use would be 125 visitor days/year more than under nondesignation. Projected total use days/year would be about the same whether the WSA is or is not designated. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the White Canyon WSA. See Table 3-3.

**Conclusion:** Designation would increase (by 25) the visitors to the WSA and would change the type of recreation from a mix of motorized and nonmotorized to all nonmotorized recreation.

## Impacts on Wildlife

The *All Wilderness* alternative would prevent mining-related surface disturbance on 50 percent of the WSA's 50 acres of riparian habitat. Thus crucial habitat would be protected for five special-status species—peregrine falcon (Federal Endangered Species), Gilbert's skink, zone-tailed hawk, Cooper's hawk and sharp-shinned hawk. Protecting the riparian habitat would enhance the survival of a rich assemblage of species. This alternative would prevent the loss or disturbance of 50 percent of the WSA's suitable desert bighorn sheep habitat, which would benefit prospective populations.

**Conclusion:** Designation would prevent the loss of 50 percent of the WSA's riparian habitat that supports populations of five special-status wildlife species. Designation would also prevent the loss of the WSA as a suitable bighorn sheep reintroduction site.

### Impacts on Cultural Resources

Three *National Register* eligible cultural properties (including two rock shelters and one prehistoric tool site) would benefit from designation because designation would prevent development of a large scale open pit mine. Without the improved access to the site area, the destructive agents of vandalism and vehicular traffic would not be so apt to happen.

**Conclusion:** Designation would protect the WSA's three known *National Register* eligible properties from the effects of mining and vandalism. These cultural properties would otherwise be destroyed by mining activities and human disturbances, such as vandalism and road building.

### Impacts on Economics

Designation would prevent development of a large scale world class copper mine within the WSA. Mining operations in the world class category typically employ over 1,000 persons; thus, preventing development of this mine through designation would have large scale adverse impacts on local economies.

**Conclusion:** Designation is expected to prevent development of a world class copper mine within the WSA. Thus, designation would cause large scale economic impacts to this already economically depressed area.

## PICACHO MOUNTAINS—WSA 2-194 (Map 2-4) PROPOSED ACTION (NO WILDERNESS)

None of the Picacho Mountains WSA's 6,400 acres would be designated as wilderness under the *Proposed Action*.

### Impacts on Wilderness Values

None of the wilderness values on the WSA's 6,400 acres would receive the legislative protection provided by wilderness designation. Adverse impacts are anticipated from communication site development and mineral development.

Wilderness values are expected to experience long-term adverse impacts from the installation of up to 15 communi-

cation sites in the WSA. Sites are expected to be on Newman Peak and adjacent high peaks. About three acres of surface disturbance would result from construction of communication sites.

The presence of communication facilities on Newman Peak and associated ridgelines would greatly reduce the natural character of the WSA and decrease the attractiveness of the area as a setting for hiking and other primitive recreation. The perception of naturalness would be impaired on over 4,800 acres (75 percent of the WSA). Travelers along Interstate 10 outside the WSA would have scenic vistas of the Picacho Mountains ridgeline impaired by the presence of communication facilities.

Opportunities for solitude would also be impaired across 4,800 acres since communication site development would be noticeable from most parts of the WSA. Helicopter noise from the regular servicing flights, backup generator operation and maintenance activities would be seen or heard throughout much of the WSA.

Development of an anticipated underground gold mine in T. 8 S., R. 5 E, sec. 26 would result in five acres of surface disturbance from drilling eight holes, development of the mine and construction of a mill. The mine would be visible from surrounding higher terrain; thus, a visitor's perception of naturalness would be impaired on 600 acres. Sights and sounds of mining would lower the quality of solitude on 600 acres.

Sights and sounds from recreational motorized vehicle use (125 visitor use days/year) would occasionally impact solitude.

**Conclusion:** Nondesignation would allow development to occur that would result in the loss of wilderness values across 85 percent of the WSA. The remaining 15 percent of the WSA, unaffected by development, would be so small an area that it would no longer be considered wilderness in character. Therefore, nondesignation would result in the entire WSA becoming nonwilderness in character.

### Impacts on Mineral Development

All 6,400 acres within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws and other pertinent laws and regulations. Exploration and development would be allowed in an area considered likely to contain gold and porphyry copper deposits. Development of a small underground gold mine is anticipated over the long term.

**Conclusion:** Nondesignation would allow development of a small scale gold mine within the WSA.

### Impacts on Recreation Use

Nondesignation would allow motorized-dependent recreation uses on all 6,400 acres and on its 1.3 miles of



*The rugged Picacho Mountains ridgeline is seen daily by thousands of motorists along Interstate Highway 10.*

vehicle way. Total motorized and nonmotorized (hunting, hiking and camping) recreation use would each increase by 25 visitor days/year. See Table 3-3.

**Conclusion:** Under nondesignation the mix of motorized and nonmotorized use is expected to increase by a total of 50 visitor days/year from the present and to be 50 visitor days fewer than under designation. No change in the types of recreation or development of recreation facilities is anticipated.

### Impacts on Land Uses

Existing and anticipated land uses, including authorizations for communication sites and other rights-of-way would be allowed. The WSA's three existing communication sites would continue to operate and an additional ten to fifteen sites would be authorized. The Picacho Mountain ridgeline is highly desirable for such use. Communication networks between Tucson and Phoenix will be facilitated by the use of Newman Peak. Both private and governmental communication facilities are expected.

**Conclusion:** Nondesignation would allow both existing and future communication site

development for government and private users.

### Impacts to Wildlife

Under the *Proposed Action*, habitat suitable for desert bighorn sheep introductions would be lost. Fifteen acres of habitat would be disturbed during communication site construction. Adjacent habitat would be lost because of the human activities associated with site construction and maintenance. Each additional peak developed would increase the total amount of adjacent habitat influenced by the sites. Moreover, site operation requirements, including helicopter use, regular maintenance and use of backup generators, would ruin much of the crestline for suitable bighorn sheep habitat.

**Conclusion:** Nondesignation would allow development in the WSA that would remove the WSA from consideration as a bighorn sheep reintroduction site.

### ALL WILDERNESS

All 6,400 acres of Picacho Mountains WSA would be

designated as wilderness under the *All Wilderness* alternative.

### Impacts on Wilderness Values

Wilderness values would be protected by legislative mandate, although mining claims in the WSA with valid existing rights could be developed.

With wilderness designation, installation of 10 to 15 communication sites would be prohibited and the present three would be removed. The natural character of three acres on the Picacho Mountains ridgeline would be maintained. The perception of naturalness would be sustained over 4,800 acres since the ridgeline would remain free of towers, buildings and powerlines. The WSA would retain its value as a setting for primitive recreation. Scenic vistas unaffected by communication sites would be preserved for visitors inside and outside the WSA.

Development of an underground gold mine (on mining claims assumed to have valid existing rights) is anticipated in T. 8 S., R. 5 E., sec. 26. Five acres of surface disturbance would result from a drilling program, development of an underground mine and construction of a mill. The mine would be visible from surrounding higher terrain; thus, a visitor's perception of naturalness would be impaired on 600 acres. Sights and sounds of mining would lower the quality of solitude on 600 acres.

**Conclusion:** Designation would prevent communication site development, thereby protecting wilderness values on 90 percent of the WSA. A mining claim assumed to have valid existing rights would impair wilderness characteristics on 10 percent of the WSA, but designation would allow the WSA to remain wilderness in character.

### Impacts on Mineral Resources

Wilderness designation would withdraw 6,400 acres of public land from all forms of mineral entry, except for valid existing rights at the time of designation. Considerable information, both historical and recent, indicates the probability of commercial quantities of minerals within the WSA. No estimates of mineral reserve quantities or assay values are available. It is anticipated that exploration drilling and a small precious metals/copper mine will be developed in section 26 on the known mineralized contact. This mining operation is assumed to have valid existing rights at the time of designation and, therefore, would not be impacted by designation.

**Conclusion:** Designation is not expected to affect development of the WSA's small scale gold and copper mine. However, designation would withdraw 3,640 acres with a moderate mineral potential from further exploration and development.

### Impacts on Recreation Use

Designation would prohibit motorized recreation on 1.3 miles of vehicle ways and all 6,400 acres of the WSA. Long-term motorized use would, therefore, be 125 visitor days/year fewer than under nondesignation. Long-term non-motorized use would be 175 visitor days/year more than under nondesignation. Projected total use days/year would be 50 more if the WSA is designated. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the Picacho Mountain WSA. See Table 3-3.

**Conclusion:** Designation would somewhat affect the total amount of use (50 more days a year) and would change the use from a mix of nonmotorized and motorized use to all nonmotorized.

### Impacts on Land Uses

Wilderness designation would impact land uses by requiring removal of three existing communication facilities presently authorized on Newman Peak under the Interim Management Policy. Designation would also prevent the probable establishment of 10 to 15 other similar communication sites. Newman Peak's importance as a major link in a growing Tucson/Phoenix government and private communication corridor would be lost.

**Conclusion:** Designation would impact land uses by requiring the removal of existing communication facilities and by precluding the establishment of 10 to 15 additional communication sites in the future.

### Impacts on Wildlife

Wilderness designation would allow a future desert bighorn sheep introduction. Existing communication sites would be removed and additional sites would not be permitted. Thus, suitable desert bighorn habitat would not be lost due to human disturbances within the WSA.

**Conclusion:** Designation of the Picacho Mountains would preserve habitat, currently threatened by communication site development, for the introduction of desert bighorn sheep.

## COYOTE MOUNTAINS—WSA 2-202 (Map 2-5) PROPOSED ACTION (ALL WILDERNESS)

All of the Coyote Mountains WSA's 5,080 acres would be designated as wilderness under the *Proposed Action*.

## Impacts on Wilderness Values

Wilderness designation would preclude development of an underground mine in Mendoza Canyon, thus protecting (1) naturalness on 15 acres, (2) the perception of naturalness on 1,125 acres and (3) solitude and primitive recreation opportunities on 3,520 acres. Without designation, these lands (69 percent of the WSA) would otherwise be impacted by the construction of roads and facilities, and the sights and sounds associated with mining.

**Conclusion:** Designation would prevent development that is expected to impair the WSA's wilderness character across 69 percent of the WSA. This loss would make the area unusable as wilderness; therefore, designation would maintain the WSA's wilderness qualities.

## Impacts on Mineral Development

Wilderness designation would withdraw 5,080 acres of public land from all forms of mineral entry, except for valid rights existing at the time of designation. Considerable information, both historical and recent, indicates the probability of commercial quantities of economic minerals within this WSA. About 71 percent of this WSA is judged moderately favorable for metallic and uranium resources.

All mineral exploration would be precluded. One commercial copper, tungsten, gold and silver operation would

be forgone because of a lack of adequate time for exploration prior to designation. No estimate of the mine's mineral reserves is available. A 640-acre area considered highly favorable for economic scheelite deposits could not be explored. In addition, exploration activities for exotic minerals such as beryl, niobium, columbite, tantalite, samarskite and lithium would cease.

**Conclusion:** Designation is expected to prevent development of a commercial quality copper, gold and silver mineral deposit. In addition, 640 acres with a high mineral potential would be withdrawn and made unavailable for future mineral exploration.

## Impacts on Recreation Use

Designation would prohibit motorized recreation on 1.3 miles of vehicle ways and all 5,080 acres of the WSA. Long-term motorized use would, therefore, be 200 visitor days/year fewer than under nondesignation. Long-term non-motorized use would be 200 visitor days/year more than under nondesignation. Projected total use days/year would remain the same whether or not the WSA is designated. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the Coyote Mountain WSA. See Table 3-3.

**Conclusion:** Designation would not affect the total amount of use but would change the use



*Mendoza Canyon's bluffs, granite domes, and sheer rock faces create scenic features enhancing the Coyote Mountains WSA's wilderness values.*

from a mix of nonmotorized and motorized use to all nonmotorized.

## NO WILDERNESS

None of the Coyote Mountains WSA's 5,080 acres would be designated as wilderness under the *No Wilderness* alternative.

### Impacts on Wilderness Values

None of the wilderness values on the WSA's 5,080 acres would receive wilderness-related legislative protection.

Development of a mine in Mendoza Canyon would impact wilderness values because the small size of the WSA and its topographic arrangement make impacts in Mendoza Canyon noticeable across much of the area. The sights and sounds of mining would permanently disturb the wilderness value of naturalness on 15 acres, impair visitor's perception of naturalness on 1,125 acres and cause the loss of solitude across 3,520 acres.

The value of the WSA as a natural setting for primitive recreation activities would also be lost. Mendoza Canyon is the WSA's most visited area and considered its most scenic feature. Recreationists would find it difficult to escape the impact of the mine on natural and scenic values.

**Conclusion:** Nondesignation would result in the loss of wilderness values across 69 percent of the WSA. This loss would make the entire WSA unusable as a wilderness.

### Impacts on Mineral Development

All lands within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws and other pertinent laws and regulations. This includes 3,640 acres considered moderately favorable for metallic and uranium resources. One commercial copper, gold, tungsten and silver mine could be developed if unencumbered by wilderness. Potential deposits of scheelite and a variety of exotic minerals could be explored. Extraction could occur if recoverable deposits are found.

**Conclusion:** Nondesignation would allow the development of the WSA's commercial copper, gold and silver deposits. In addition, 640 acres with a high mineral potential would remain open for mineral exploration.

### Impacts on Recreation Use

Under nondesignation visitor days/year of motorized recreation use would increase from zero at present to 200 and nonmotorized use would decrease from 370 to 250—because of new access roads and the sights and sounds of mining in Mendoza Canyon. Total recreation use levels would rise by 18 percent—a result of motorized recreation-

ists using improved access roads to enter the WSA. Nonmotorized recreation use would be 200 fewer than under designation. See table 3-3.

**Conclusion:** Nondesignation would replace the existing type of recreation use, presently all nonmotorized, with a combination of both motorized (44 percent of total use) and nonmotorized (56 percent). Total recreation use would be the same whether or not the WSA is designated, but under nondesignation use would be about equally divided between motorized and nonmotorized.

## BABOQUIVARI PEAK—WSA 2-203B (Map 2-6) PROPOSED ACTION (ALL WILDERNESS)

All 2,065 acres of the Baboquivari Peak WSA would be designated as wilderness under the *Proposed Action*.

### Impacts on Wilderness Values

Under this alternative all 2,065 acres of the WSA would be legislatively protected by wilderness designation. Also protected would be the natural character of an area considered sacred and used for religious purposes by the Tohono O'odham Indians. The short- and long-term impact of designation would be negligible since no development or other activities detrimental to wilderness values are anticipated in the future whether the area is designated wilderness or not.

**Conclusion:** All wilderness values would be protected by legislative mandate. No adverse or beneficial impacts to wilderness values are anticipated from the designation of this area as no development is expected to occur with or without wilderness designation.

### Impacts on Mineral Development

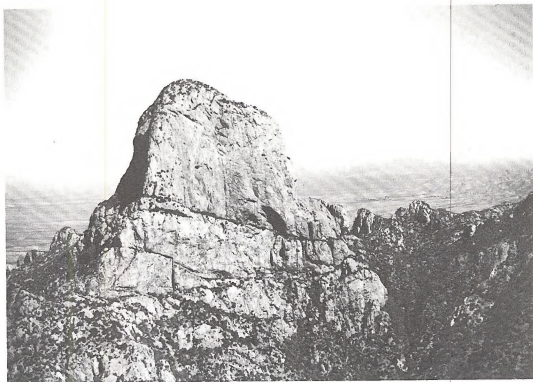
Designation would withdraw all 2,065 acres from mineral entry. No mineral exploration or development is anticipated in the WSA. Therefore, no commercial development would be forgone if the area were designated.

**Conclusion:** No mineral activity is anticipated in the Baboquivari Peak WSA. Therefore, designation would not impact mineral exploration or development.

### Impacts on Recreation Use

Designation would prohibit motorized recreation on all 2,065 acres of the WSA; however, there is no known motorized recreation there now so there would be no change.





*The eastern face of Baboquivari Peak provides technical rock climbing opportunities in the Baboquivari Peak WSA.*

Long-term nonmotorized use would be 100 visitor days/year more than under nondesignation. The projected change in visitor use is not expected to cause significant impacts to public lands nearby or to the Baboquivari Peak WSA. See Table 3-3.

**Conclusion:** Designation would not impact the type of recreation activities in the WSA because all such use is nonmotorized; however, use would increase by 100 visitor days/year in the long term.

## NO WILDERNESS

None of the Baboquivari Peak WSA's 2,065 acres would be designated as wilderness under the *No Wilderness* alternative.

### Impacts on Wilderness Values

None of the Baboquivari Peak WSA's 2,065 acres would receive wilderness-related legislative protection. Both the short- and long-term impact of this action would be negligible, since no development or other activities detrimental to wilderness values are anticipated in the future whether or not the area is designated wilderness.

**Conclusion:** None of the WSA's wilderness values would receive the legislative protection provided by wilderness designation. However, no adverse or beneficial impacts to wilderness values are anticipated because no development is expected in this WSA.

### Impacts on Mineral Development

All lands within the WSA would remain open for mineral leasing and for development of minerals under the general mining laws and other pertinent laws and regulations. There would be no development of mineral resources foregone with this alternative because no exploration or development is anticipated.

**Conclusion:** Nondesignation would not affect mineral development because no such development is expected in this WSA.

### Impacts on Recreation Use

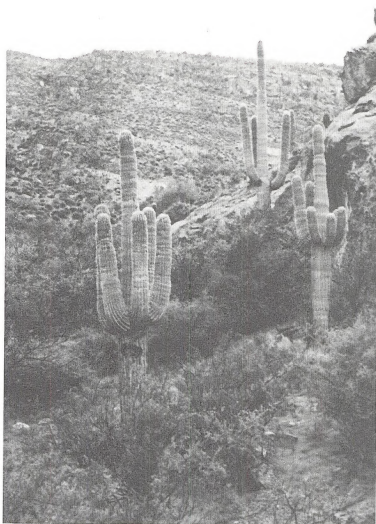
Under nondesignation current recreation uses would continue. Levels of nonmotorized recreation use, including hiking, camping and mountain climbing, would increase

50 visitor use days/year over the long term, but would be 100 fewer than under designation. There is no motorized recreation at present in the WSA, nor is any projected. See Table 3-3.

**Conclusion:** Under nondesignation current recreation uses would continue—projections are for 400 visitor days/year of non-motorized and zero days of motorized recreation.

## MITIGATING MEASURES

No specific mitigation measures have been identified in this FEIS that would reduce the impacts of wilderness designation or nondesignation. No mitigation is identified because the actions described in Chapter 2 of this FEIS are only anticipated and are used primarily for analysis purposes. It is anticipated that some of the actions described in Chapter 2 will occur. When BLM receives applications for



*Plant communities common to the Sonoran Desert, such as the saguaro-palo-verde community pictured here, occur in all the WSAs except Mount Wilson.*

specific projects an environmental process is triggered whereby environmental impacts are assessed and specific mitigation measures are taken to lessen those impacts. Therefore, because of the speculative nature of the actions described in Chapter 2, no mitigating measures are identified to mitigate the impact of those actions in this FEIS.

## UNAVOIDABLE ADVERSE IMPACTS

No mitigation measures have been identified that would reduce or eliminate the adverse impacts expected under the *Proposed Action*. Therefore, all adverse impacts identified under the *Proposed Action* are unavoidable.

The *Proposed Action* would close 31,966 acres to mineral entry. No prospecting, exploration or mining would be allowed, subject to valid existing rights. In addition, 31,966 acres would be closed to oil and gas leasing.

Off-road vehicle use would be affected by the closure of 13 miles of vehicle ways, three miles of roads and 31,966 acres of wilderness.

Certain impairing activities would be allowed in the three WSAs recommended for nondesignation under the *Proposed Action*. Mining, motorized vehicle use and communication site development would impair wilderness values in some areas. These impacts would be somewhat mitigated thru BLM's environmental assessment process. However, until that process is triggered with a project application, these impacts can only be described as unavoidable.

## IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Nondesignation of the three WSAs identified under the *Proposed Action* would result in some irreversible and irrevivable commitments of resources. Activities such as

mining and communication site development may permanently impair wilderness values. However, where reclamation of disturbed sites is possible, impairing activities could be mitigated and would not result in an irretrievable commitment of resources.

## RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

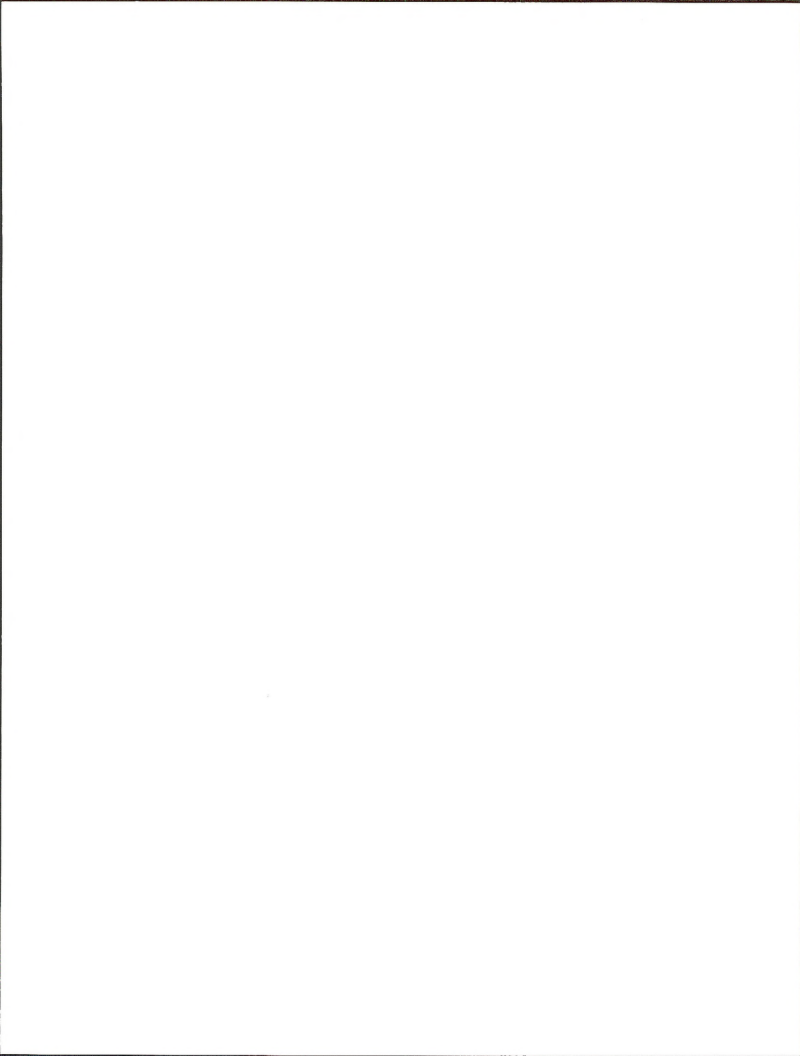
The basic objective of the *Proposed Action* is to establish an allocation of resources consistent with the principles of multiple use and sustained yield. The *Proposed Action* provides for the protection of wilderness and associated values in three WSAs while allowing the development and use of resources in the three WSAs recommended as nonsuitable for wilderness.

The use of mineral and some recreation resources in the three areas proposed for designation would be forgone. The losses of some mineral values would be long term. However, wilderness values would benefit from designation over the long term.

The use and preservation of some wilderness resources in the three WSAs recommended nonsuitable for wilderness could be forgone in order to use some commodity resources. Use of the areas for rights-of-way and mineral development could increase. Motorized recreation use would increase over the long term, while primitive recreation use would stay the same or decline.

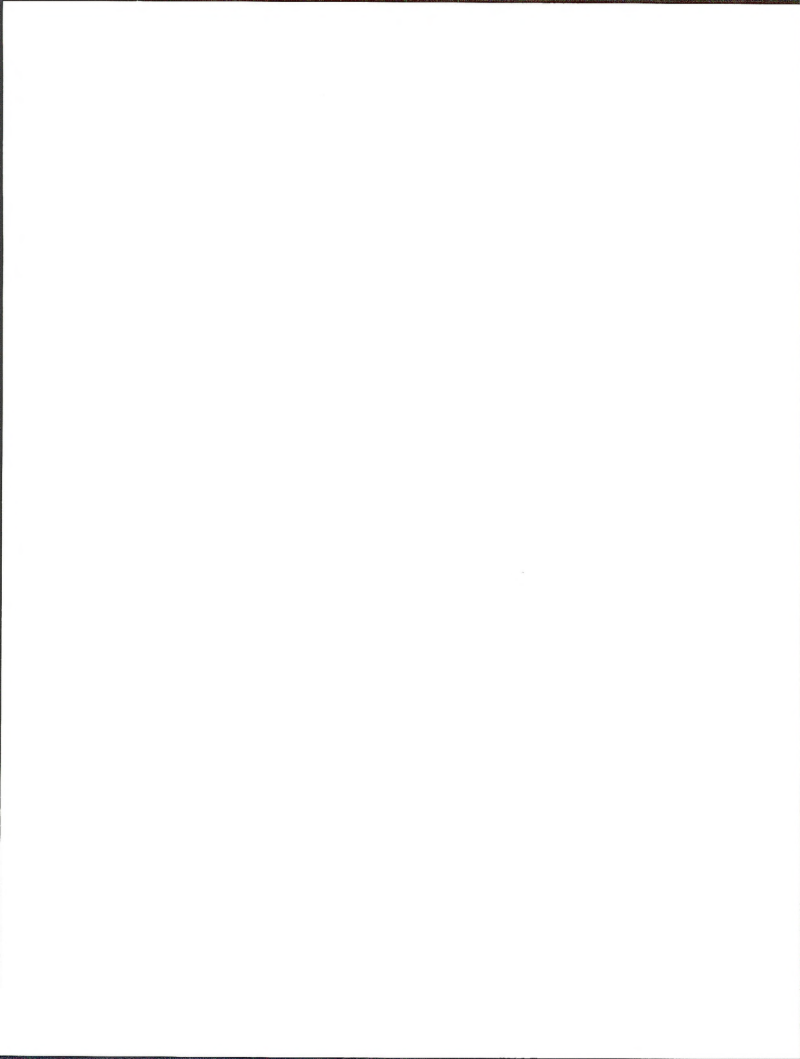
## ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL

Energy use would not differ significantly for any alternative. No conservation potentials are evident.



# **Chapter 5**

## **CONSULTATION AND COORDINATION**



# CHAPTER 5

## CONSULTATION AND COORDINATION

### INTRODUCTION

The *Phoenix Wilderness Final Environmental Impact Statement* was prepared by specialists from the Phoenix District Office and the Kingman and Phoenix Resource Areas. The Arizona State Office planning staff and resource specialists provided technical reviews and suggestions. Disciplines and skills used to develop this FEIS were range, land management, recreation, sociology, economics, cultural resources, mineral resources, water resources, visual resources, wildlife, wilderness, editing and word processing. Writing of this FEIS began in May 1985.

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Stanley Wagner, Environmental Coordinator  
Robert Abbey, Wilderness Specialist  
Ray Brady, DSD, Mineral Resources

### SCOPING (Issue Identification)

Scoping served to identify the significant environmental issues to be analyzed in the EIS and de-emphasized or eliminated from detailed study insignificant issues or issues addressed in earlier environmental reviews. The significant environmental issues were then incorporated into a range of alternatives, and the effects or impacts of implementing such alternatives were analyzed in this EIS.

BLM held several public scoping meetings to help identify public concerns about wilderness. Other issues were identified by reviewing public comments received during the wilderness inventory. Based on professional judgment, BLM resource specialists also identified issues. A review of all issues by resource managers and an interdisciplinary team concluded the scoping process.

The scoping process for the EIS area involved several phases, extending from the fall of 1978 to January 1982:

- Initial wilderness inventory and public comment period—November 1978 to April 1979
- Intensive wilderness inventory and public comment period—June 1979 to November 1980
- Letters requesting mineral information sent to energy and mineral industries and individual claim holders with interest in or claims in or near the WSAs—November 1981 and March 1982
- Meetings with interested energy and minerals groups—December 1981 and January 1982
- BLM study and planning process—October 1982 to April 1983
- Public comment period on preliminary alternatives and EIS issues—April 1983 to June 1983
- Public meetings in Tucson, Kingman, Phoenix, and Gila Bend, Arizona to solicit public comments on preliminary alternatives and identify additional issues—May 1983
- Federal Register, Notice of Intent to Prepare EIS—June 1983
- Letters to Indian tribal leaders—June 1983

## LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THIS STATEMENT HAVE BEEN SENT

BLM requested comments on the Draft EIS from all affected grazing permittees, interested individuals, federal and state agencies, and interest groups. Due to the size of the mailing list (800), the following is a partial list of those who received the document.

### Federal Agencies

Advisory Council on Historic Preservation  
 Environmental Protection Agency  
 Department of Agriculture  
     Forest Service  
     Soil Conservation Service  
 Department of Defense  
     Army Corps of Engineers  
     U.S. Air Force  
 Department of Energy  
 Department of the Interior  
     Bureau of Mines  
     Bureau of Indian Affairs  
     Bureau of Reclamation  
     Fish and Wildlife Service  
     Geological Survey  
     National Park Service  
 Department of Transportation  
 Federal Aviation Administration

### Arizona State Agencies

Arizona Commission of Agriculture and Horticulture  
 Arizona Department of Health Services  
 Arizona Department of Library, Archives, and Public Records  
 Arizona Department of Transportation  
 Arizona Game and Fish Department  
 Arizona Natural Heritage Program  
 Arizona Office of Economic Planning and Development  
 Arizona Oil and Gas Commission  
 Arizona Outdoor Recreation Coordinating Commission  
 Arizona State Clearinghouse  
 Arizona State Historic Preservation Officer  
 Arizona State Land Commissioner  
 Arizona State Parks Board  
 Arizona Water Resources Department  
 Bureau of Geology and Mineral Technology  
 Governor of Arizona  
 Governor's Commission on Arizona Environment  
 Mineral Resource Department

### Local Agencies

Central Arizona Association of Governments  
 City of Casa Grande  
 City of Eloy  
 City of Kingman  
 City of Phoenix  
 City of Superior  
 City of Tucson  
 City of Wickenburg  
 District IV Council of Governments  
 Maricopa Council of Governments  
 Maricopa County Board of Supervisors  
 Maricopa County Planning and Zoning Commission  
 Mohave County Board of Supervisors  
 Mohave County Planning and Zoning Commission  
 Northern Arizona Council of Governments  
 Pima County Board of Supervisors  
 Pima County Planning and Zoning Department  
 Pinal County Board of Supervisors  
 Pinal County Planning and Zoning Department  
 Yavapai County Board of Supervisors  
 Yavapai County Planning and Zoning Department

### Indian Tribes and Councils

Fort Mohave Tribal Council  
 Chemehuevi Tribal Council  
 Quechan Tribal Council  
 Cocopah Tribal Council  
 Havasupai Tribal Council  
 Hualapai Tribal Council  
 Tonto Apache Indian Tribal Council  
 Yavapai-Apache Community Council  
 Yavapai-Prescott Board of Directors  
 White Mountain Apache Tribal Council  
 Hopi Tribal Council  
 Kaibab Band of Paiute Indians  
 Tohono O'Odham Council



Fort McDowell Mohave-Apache Community Council  
 Pasequa Yaqui Tribal Council  
 Ak-Chin Indian Community  
 Gila River Indian Community  
 Salt River Pima-Maricopa Community Council  
 San Carlos Apache Tribal Council  
 Navajo Tribal Council

## Other Organizations

Arizona Cattle Growers Association  
 Arizona Desert Bighorn Sheep Society  
 Arizona Mining Association  
 Arizona Mining and Prospecting Association  
 Arizona Prospectors and Small Mine Operators Association  
 Arizona Wildlife Federation  
 Arizona Wool Growers Association  
 Arizona 4-Wheel Drive Association  
 Audubon Society  
 Defenders of Wildlife  
 Desert Tortoise Council  
 Kingman Grazing Advisory Board  
 League of Women Voters  
 Legal Organizations  
 Mining Companies  
 Phoenix District Advisory Council  
 National Audubon Society  
 National Council of Public Land Users  
 Natural Resources Defense Council, Inc.  
 News Media  
 Oil and Gas Companies  
 ORV Clubs  
 Phoenix-Lower Gila Resource Areas Grazing Advisory Board  
 Public Lands Council  
 Rockhound Clubs  
 Sierra Club (Local and National)  
 The Wilderness Society  
 Utility Companies  
 Wild Burro Protection Association  
 Wildlife Society

## Elected Representatives

### Federal

Senator Dennis DeConcini  
 Senator Barry Goldwater  
 Representative John McCain  
 Representative Jim McNulty  
 Representative Eldon Rudd  
 Representative Bob Stump  
 Representative Morris K. Udall

### State

Senator Bill Davis  
 Senator John U. Hays  
 Senator A.V. "Bill" Hardt  
 Senator Peter Rios  
 Senator S.H. "Hal" Runyon  
 Representative Don Aldridge

Representative Jan Brewer  
 Representative Bob Denny  
 Representative Jerry Everall  
 Representative Edward Guerrero  
 Representative Roy Hudson  
 Representative Richard Pacheco  
 Representative James Ratliff  
 Representative E.C. "Polly" Rosenbaum  
 Representative Nancy Wessel

## REVIEW PROCESS

The draft EIS was filed with the Environmental Protection Agency on December 14, 1984 and their notice of receipt was published in the *Federal Register* on December 21, 1984. The comment period extended through March 11, 1985. The Bureau of Land Management's notice of availability and announcement of public hearings was published in the *Federal Register* on December 21, 1984.

More than 1,000 copies of the draft EIS were distributed to federal, state and local government agencies, organizations and individuals for review and comment. News releases from Washington and Phoenix provided information about obtaining copies of the draft EIS and time, date and locations of the scheduled public hearings.

The Bureau of Land Management (BLM) held public hearings to receive oral testimony from the interested public on the draft EIS in Tucson, Phoenix and Kingman, Arizona. The public hearing in Tucson, Arizona was held January 30, 1985, 7:00 p.m. and 16 individuals spoke. The public hearing in Kingman, Arizona, was held February 5, 1986; two individuals attended but no one spoke. The public hearing in Phoenix, Arizona was held on February 7, 1985, 7:00 p.m. and 13 individuals spoke.

The written comments that were received regarding the DEIS are published in this document. The EIS team and management reviewed all comments and responded to those questioning the analysis or raising issues related to the environmental impacts of the *Proposed Action* and alternatives. All comments, however, will be considered by BLM managers in making the recommendations for wilderness.

## WRITTEN COMMENTS

Grouped by (1) Federal, (2) State, (3) Local (including Indian tribes) and (4) Other. Comments are numbered in order of their receipt.

### FEDERAL

1. Chino Valley Ranger District
11. National Park Service (Western Region)
20. U.S. Fish and Wildlife Service
42. U.S. Department of Energy WAPA
43. U.S. Department of Health and Human Services

- 63. U.S. Nuclear Regulatory Commission
- 71. U.S. Environmental Protection Agency
- 74. U.S. Bureau of Reclamation, Lower Colorado Regional Office

**STATE**

- 7. Arizona Department of Mines and Mineral Resources
- 10. Arizona Office of Economic Planning
- 25. Arizona State Parks
- 38. Arizona Bureau of Geology and Mineral Technology
- 39. Arizona Department of Transportation
- 77. Arizona Game and Fish Department

**LOCAL**

- 11. Sierra Club Toiyabe Chapter
- 15. Sierra Club Rincon Group
- 22. United Four-Wheel Drive Association
- 34. Arizona desert Bighorn Sheep Society Inc.
- 35. Desert Bighorn Council
- 40. Yuma Audubon Society
- 58. National Parks and Conservation Association
- 61. Arizona Native Plant Society
- 67. Arizona Prospectors and Small Mine Operators Association
- 68. Arizona Mining Association
- 69. Arizona Mining Association
- 72. Arizona Prospector and Small Mine Operators Association

**OTHER**

- 2. Daniel McCool
- 3. Jim Notestine
- 4. Allen Lovejoy
- 5. Robert F. Green, M.D.
- 6. Thomas J. Myers
- 8. D. L. Pierson
- 9. Randy Waltrip
- 12. Garlyn Johnson
- 13. Walter and Dorothy Pelech
- 14. Ms. Mary Howell
- 16. Maria D. Collaze
- 17. Charles I. Motes
- 18. Gertrude A. Hochgraf
- 21. Robert and Beth Flores
- 23. Drew Cook
- 24. Michael Simonson
- 26. Lucy Veit Sanders
- 27. George Horn
- 28. Betty Herrera
- 29. Mr. & Mrs. Thomas Angenent
- 30. Susie Siedentop & Michael Ranger
- 31. K. Holder
- 32. James E. Posedly
- 33. John V. Pluth
- 36. Dr. Paul Hintzen

- 37. Alvin Gerhardt
- 41. Bruce K. Thompson
- 44. William A. Facciaelli
- 45. Wildlife Management Institute
- 46. Tom Gehrels
- 47. Bettina Bickel
- 48. James Heeringa
- 49. Don Tivitchell
- 50. V. B. Jones
- 51. Frances O. Illingworth
- 52. Michael R. Thompson
- 53. Susan Thompson
- 54. William F. Illingworth
- 55. Randy Shumway
- 56. Jay Forrest, J. Lewis Stitson Phillis David
- 57. Sidney M. Hirsh
- 59. Jim Frankenfield
- 60. Thomas J. Myers
- 62. Jimmy G. Scharnek
- 64. H. J. (Jake) Turin
- 65. Dan Fisher
- 66. Timothy J. Flood
- 73. Tom Wright
- 75. Mr. and Mrs. J. E. Lilly
- 76. John Prater
- 77. Leroy Zimmerman
- 78. Robert J. Schmidli
- 79. M. K. Daly
- 80. Rose Mary Spaulding
- 81. Mrs. Gene Ann Parker
- 82. P. J. Miller
- 83. Janice C. Luepke
- 84. Don Ayres
- 85. Scott Hudson
- 86. Frank S. Loulan
- 87. Nancy Russell
- 88. Lillian Longley
- 89. Walter McCleneghar
- 90. John Winter
- 91. Michael Wunder
- 92. William S. Finkelstein
- 93. Barbara Jacobson
- 94. Karl Greenblatt
- 95. Mary McBee
- 96. F. L. Salinger
- 97. F. L. Salinger
- 98. Marjorie Woodruff
- 99. Rose Marie King
- 100. J. Salty Honcharik
- 101. Nancy Tukey
- 102. Sara Traum
- 103. John S. Jachna
- 104. Peggy Ann Doty
- 105. Dianne M. Zahule
- 106. Dorothy Lees Riddle
- 107. Greg Barr
- 108. John Pamperin
- 109. Julie Kley
- 110. Randy Ryan
- 111. Michael Margulis
- 112. Scott Samuels
- 113. Cora Newman Samuels
- 114. Eddie Bennett
- 115. Mary Sojourner

- 116. Flynn Kelly
- 117. Carroll Klein
- 118. Richard Faith
- 119. L. Chetham
- 120. Donovan H. Lyngholm
- 121. Mary McBee

## GENERAL RESPONSE

A number of comments were received regarding Ragged Top WSA. The original inventory unit consisted of approximately 8,480 acres. During the intensive inventory several roads and mining activities were mapped, these comprised significant impacts and necessitated boundary modifications, reducing the size of the unit by approximately 4,020

acres. The remaining 4,460 acres, which includes Ragged Top and portions of the surrounding bajada, are in natural condition. The 4,460 acre unit became WSA 2-197 after completion of the intensive inventory.

The *Federal Register* notice of December 30, 1982 dropped the Ragged Top WSA from further wilderness study. On April 18, 1985, U.S. District Court Judge Lawrence Karlton ruled in *Sierra Club vs. Watt* that the Secretary has discretion in determining whether areas less than 5,000 acres should be studied for wilderness. Arizona BLM plans to prepare a wilderness EIS to include the previously dropped split-mineral estate WSAs and WSAs less than 5,000 acres in FY-1987. Ragged Top WSA will be included in the EIS.

The hearing transcripts and the written comments with BLM's responses follow.

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PUBLIC HEARING

BUREAU OF LAND MANAGEMENT  
WILDERNESS STUDY OF THE PHOENIX RESOURCE AREA

January 30, 1985  
Tucson Hilton Inn  
Rincon Room  
1601 N. Miracle Mile  
Tucson, Arizona

7:00 a.m. - 9:00 a.m.

CHAPMAN AND ASSOCIATES  
COURT REPORTERS  
1814 E. CLAYTON STREET, SUITE 11  
PHOENIX, ARIZONA 85024  
TELEPHONE (602) 252-2827

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I N D E X

<u>SPEAKER:</u>	<u>PAGE NO.</u>
Beaumont C. McClure	3
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James Heringa	46
Bob Foster	46
Tim Vanderpool	50

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P R O C E E D I N G S

MR. MCCLURE: Ladies and gentlemen, this public hearing will now come to order.

First, I would like to introduce myself. My name is Beau McClure, I'm the Deputy State Director in charge of Lands and Renewable Resources for the Bureau of Land Management in Arizona.

I have been appointed by the Arizona State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of Interior concerning the wilderness study of the Phoenix Resource Area.

Most of you have undoubtedly signed the attendance sheet as you came into the room. If you have not done so, I would like to encourage you to sign in now so that we can have a written record of the attendance here. If you plan to make a statement this evening, be sure to check the appropriate space on the attendance sheet so that we can add your name to the list of speakers.

The official reporter this evening is Bob Switzer. He is seated at the table to our left. He will prepare a verbatim transcript of everything that is said at this hearing this evening. If you wish to obtain a copy of the transcript, you should make your own arrangements with

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the reporter.

This public hearing is required by statute and is being held to obtain information relating to six wilderness study areas which have been studied by the Bureau of Land Management. A draft Environmental Impact Statement, on this subject has been published and is available in the back of the room.

The purpose of this hearing centers on two issues. First, are these six wilderness study areas suitable or not suitable for designation as wilderness. Your views and any information you can offer with respect to this question will be greatly appreciated.

Second, is the draft Environmental Impact Statement adequate? Your comments and suggestions on this aspect of the study will also be appreciated.

In arranging for this public hearing, notices were sent to the United States Senators Goldwater and DeConcini, and Representatives Udell, Radd, Dunk, McWharty and McCain, and to Governor Sabin and other elected officials.

Notices have also been sent to federal, state and local governmental agencies and organizations and individuals known to be interested in this wilderness study.

Now for a few words about procedure. This hearing is not a debate, a trial or a question and answer situation. It is an advisory hearing and all interested

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1 persons may present statements, either written or oral, or  
 2 both, or other information pertinent to the wilderness study  
 3 we are considering tonight. There will be no cross-examination  
 4 from the audience, but if anyone fails to understand the  
 5 statement of any speaker you may direct a clarifying question  
 6 to me, and I will determine whether it is pertinent. This  
 7 may seem overly formal, but it is intended to give everyone a  
 8 fair and reasonable opportunity to present his or her view.

9 When I finish my opening statement I will call  
 10 on a Bureau of Land Management representative to explain the  
 11 BLM's proposed action. That presentation should take a few  
 12 minutes.

13 Then I will call on any elected governmental  
 14 official present who wishes to make a statement. After that,  
 15 we will proceed with other speakers.

16 In view of the number of people who wish to  
 17 speak and the limited time available, each speaker will be  
 18 limited to ten minutes. If it appears that we are running  
 19 into time problems, as the evening goes by, we may have to  
 20 limit the testimony to five minutes. However, I think if  
 21 everyone who is good about keeping their comments within ten  
 22 minutes, we'll be all right this evening.

23 If you cannot express all your comments in the  
 24 length of time given, you may submit further comments in  
 25 writing. Any written statements submitted here will be

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1 the matter. After the hearing record closes on March 11,  
 2 1985, there will be a thorough review of the draft  
 3 Environmental Impact Statement. Your comments will be  
 4 considered by the BLM state director, and he will make his  
 5 recommendations to the BLM director in Washington, who must  
 6 make a recommendation to the Secretary of the Interior.

7 After due consideration, the Secretary will  
 8 transmit his recommendation to the President. The President,  
 9 in turn, will transmit his recommendations to Congress. After  
 10 appropriate consideration, which will include hearings, the  
 11 Congress will accept, reject or modify the President's  
 12 proposal.

13 Only Congress can designate an area as  
 14 wilderness, and only Congress can release a BLM wilderness  
 15 study area from its study status. As you can see, the BLM  
 16 preliminary proposal before you today will undergo  
 17 comprehensive review and this public hearing and your views  
 18 are every important part of the review process.

19 This evening we have with us several officials  
 20 from the Bureau of Land Management. To my immediate left  
 21 is Art Tower, the Phoenix Resource Area Manager. Bill Carter  
 22 is next to him, on my left. He is the team leader for the  
 23 Phoenix Resource Area Environmental Impact Statement. And  
 24 to my right is Rick Hansen, Wilderness Specialist from the  
 25 Phoenix District Office

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1 included in full in the transcript and will be considered on  
 2 the same basis as the oral comments. If you merely want to  
 3 introduce your testimony in writing this evening, you may  
 4 feel free to do that.

5 You may also submit written comments until  
 6 March 11, 1985, and these also will be included in the hearing  
 7 record and considered fully. Written comments to be  
 8 addressed to the district manager, Bureau of Land Management,  
 9 Phoenix District Office, 2015 West Deer Valley road, Phoenix,  
 10 Arizona. Zip code, 85027.

11 The Federal Land Policy and Management Act of  
 12 1976, FLIPMA, directed the Bureau of Land Management to  
 13 conduct a wilderness review of certain public lands. The  
 14 wilderness study areas under consideration here tonight were  
 15 identified by the BLM under criteria set forth under Section  
 16 2-c of the Wilderness Act. The FLIPMA directed the BLM to  
 17 review such areas and prepare recommendations as to whether  
 18 the lands are suitable or not suitable for designation as  
 19 wilderness. The law requires that a public hearing be held  
 20 as part of the study process. That is what brings us here  
 21 this evening.

22 The BLM has completed the first part of this  
 23 wilderness study and has published a draft Environmental  
 24 Impact Statement containing these preliminary findings.

25 Now it is the public's opportunity to comment on

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1 Now I'm going to call upon Art Tower of the  
 2 Bureau of Land Management to explain the wilderness study  
 3 process up to this point.

4 But first I'd like to explain again that this  
 5 is not an adversary proceeding. If you want to ask a  
 6 question to clarify a certain point, please feel free to do  
 7 so. Direct your question to me and I will determine whether  
 8 it is pertinent. If you have factual questions that you'd  
 9 like to ask, feel free to contact the BLM representatives  
 10 after the hearing and speak with them.

11 Art.

12 MR. TOWER: Thank you.

13 I'd just like to take a few minutes to bring  
 14 you all up to date on what got us here to this point in this  
 15 hearing.

16 The Bureau of Land Management is under  
 17 Congressional mandate to review countless areas of five  
 18 thousand acres or more on public lands being wilderness  
 19 characteristics and by 1991, to recommend to the President  
 20 suitable areas for preservation as wilderness. This  
 21 Environmental Impact Statement assesses the environmental  
 22 consequences of managing as wilderness, six study areas in  
 23 BLM's Phoenix district.

24 One WSA lies north of Kingman in Mohave County.

25 The other five lie between Prescott, National

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1 Forest and the United States Mexican border in Maricopa,  
2 Yavapai, Pinal and Pima Counties. The specific areas are  
3 shown on the maps in the back of the room for your reference.  
4 The Phoenix District wilderness inventory  
5 began in the fall of 1978 and follows the following steps:  
6 First, the identified roadless of five thousand  
7 acres or more. A ninety-day review period after which the  
8 land believed to meet wilderness criteria were proposed for  
9 more intensive inventory. The intensive inventory involving  
10 underground inspections to verify wilderness qualities.  
11 Another ninety-day review period during which  
12 WSAs were identified. To help scope and summarize the  
13 significant issues related to wilderness designation, BLM  
14 requested public comment on its wilderness inventory and  
15 planning process. We sent letters to interested organizations  
16 and met with various groups. The results of that effort  
17 became the proposed action for the draft Impact Statement  
18 that you will be commenting on.

19 Following the review period for this draft, we  
20 will start work on preliminary final Environmental Impact  
21 Statement, which will, when completed, be sent to the  
22 Director's office in Washington for approval and filing.

23 Following approval of the final EIS, we will  
24 make our recommendations on the wilderness designations to  
25 the Secretary, to the BLM Director in our state office and

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1 Top are very outstanding pristine areas with a lot of  
2 wilderness values. They have exceptional wildlife, scenic  
3 and primitive recreation values. The wilderness proposal  
4 would protect twenty sensitive plant species, four special  
5 status species and six crucial habitats in the natural  
6 condition.

7 The draft EIS was not a good faith attempt to  
8 weigh conflicts in the units. Wilderness lost on all the  
9 sites for minor conflicts, except one tiny unit, you know  
10 you don't dare recommend, because Bobcutter (phonetic) is  
11 such a popular area and well known to everybody in the state,  
12 that it would have been impossible, you know, for you to have  
13 not recommended that, plus it's only two thousand plus acres.

14 You are charged with weighing all values and  
15 recommending wilderness where it outweighs other values.  
16 Your anti-wilderness bias was obvious in this EIS. You  
17 recommended a great wilderness for say and all minor  
18 commercial conflicts. All of these WSAs have wilderness  
19 values that far exceed the values of the conflicts, and  
20 therefore, should have been designated wilderness.

21 All conflicts are minimal in all the units,  
22 the EIS admits that. There are no significant aspects that  
23 occur in any potential grazing levels, that is acknowledged  
24 in the EIS. When you get down to the real mineral conflicts,  
25 you're really only talking White Canyon. The others are very

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1 Washington office. And as indicated, the Secretary, in turn,  
2 will have to make his recommendations to the President  
3 through Congress for their final decision.

4 MR. MCCLURE: Thank you, Art.  
5 Is there anyone here to represent the Governor  
6 of Arizona tonight?  
7 Any member of Congress?  
8 Member of the State Legislature?  
9 My first witness this evening is Jim Notestine.  
10 Please give your name and who you represent.  
11 MR. NOTESTINE: I assume you want us to use  
12 this podium?  
13 MR. MCCLURE: Yes.  
14 MR. NOTESTINE: Okay, I'm Jim Notestine from  
15 Sonoita, Arizona, and I'm representing the Biscoe group of  
16 the Sierra Club.  
17 And the Sierra Club recommends the whole  
18 wilderness proposal be adopted as the proposed action in the  
19 final draft, plus one more unit, Regged Top, (phonetic)  
20 which was dropped by Watt and which shouldn't have been  
21 dropped, and we'll discuss that later.

22 This is not a greedy proposal; it is actually  
23 a very small portion of the total BLM acreage in this area  
24 and in the state. Much of the land was already dropped in  
25 prior rats and reviews. The remaining six units, plus Regged

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12

1 subjective, and even White Canyon is subjective, but the  
2 potential is possibly greater there. It is copper and copper  
3 is very abundant in Arizona with a fading market. In no way  
4 in the foreseeable future can you use all the known copper  
5 deposits that we have right now.

6 The other minor conflict is with potential  
7 communication sites in Picocho Mountains, and they have  
8 alternatives that they can use and they certainly shouldn't  
9 sacrifice the wildlife and the outstanding values of Picocho  
10 Mountains for that.

11 The following are supporting arguments for  
12 wilderness recommendations for the four units, plus Regged  
13 Top, that I am most familiar with. Acquaintances of mine  
14 assure me that equally compelling arguments for the other  
15 two units exist.

16 White Canyon, perhaps of all the WSAs, White  
17 Canyon needs and deserves wilderness designation the most.  
18 Contrary to the mediocre wilderness value description given  
19 in the draft EIS, White Canyon has truly outstanding  
20 wilderness qualities. Scenery, opportunities for solitude  
21 abound, it's an outstanding wildlife area, and it's a three-  
22 mile stretch of perennial stream with lush vegetation. It's  
23 almost like one-third of Aravaipa Canyon. Aravaipa Canyon  
24 already has a waiting list most of the time for people to  
25 go into that area. We need to protect a few remaining,

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1 outstanding perennial streams that we have in this state.  
 2 Not sacrifice them for a little bit of copper in a state  
 3 that's got copper in abundant quantities.

4 Flood Canyon (phonetic) is a candidate for  
 5 reintroducing three species. One endangered and one state-  
 6 listed. On one trip in there, I identified forty-three  
 7 species of birds, and that's in one day, and I'm not an  
 8 experienced birder. I also saw the only mountain lion I've  
 9 seen in the wild in White Canyon. Bear frequent the canyon,  
 10 moving in from the adjacent Tonto Forest. I've never seen a  
 11 higher density of rattlesnakes anywhere else than I've seen in  
 12 White Canyon. White Canyon has twenty-seven known prehistoric  
 13 cultural sites and the entire unit is considered culturally  
 14 sensitive.

15 The draft EIS indicates that the opportunities  
 16 for solitude and primitive recreation are restricted and  
 17 limited. I disagree very strongly. For its size, it offers  
 18 considerable opportunities for a high quality wilderness  
 19 experience. There are very many places in White Canyon that  
 20 you can get away from people. I think it could carry forty  
 21 or fifty people in there with no problem, and it would be a  
 22 long time before we'll see that density of people using it on  
 23 a daily basis.

24 Here the topography is a higher density per  
 25 acre than Aravaipa Canyon -- pardon me, strike that.

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1 recommends that it gets opened up, and they don't recommend  
 2 wilderness for it and they would open it up for uses that  
 3 it's not used for right now. So I really have a broader  
 4 understanding their position on Coyote Mountains.

5 The wide variety of primitive recreation  
 6 available is hiking, hunting, rock climbing, photography,  
 7 sight seeing and a lot of botanical and wildlife. It's got  
 8 outstanding wildlife in that area, also.

9 Wilderness designation would protect eight  
 10 plant-species, it would also protect two hundred and fifty  
 11 culturally sensitive acres, including a classic period  
 12 Hohokam compound. Like I said previously, currently the  
 13 Silver Bell MHP recommends that the MSA be managed to protect  
 14 scenic, natural and primitive values. And so that would fit  
 15 right in with wilderness designation. I just don't  
 16 understand the call on this unit.

17 You state that the area is relatively small in  
 18 size, lessens the wilderness caliber of the MSA, solitude  
 19 and primitive recreation opportunities. Once again, I  
 20 disagree. It's a jumble, a maze of canyons, and for a unit  
 21 of five or six thousand acres, it has got an incredible  
 22 amount of solitude opportunities for that small a unit. And  
 23 there are essentially no grazing conflicts; there's thirty-two  
 24 cows in the unit right now, three hundred and eighty-four  
 25 ADWs. And there's no problem with that remaining. The cows

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1 With well-known places like Aravaipa already  
 2 with waiting lists, it really behooves us to protect White  
 3 Canyon and other canyons like that.

4 Photography is also an outstanding opportunity  
 5 in White Canyon. It is a very, very scenic canyon.

6 The draft EIS reported that White Canyon was  
 7 moderate to high favorability for metallic mineral-resource  
 8 development. The mineral analysis indicated potential for  
 9 four metals, but copper was the only primary one. And I  
 10 said earlier, copper is not a scarce resource in this state.

11 We would be sacrificing White-Canyon for the  
 12 profits of one corporation, Kennecott Corporation, is what  
 13 it really boils down to.

14 It is truly an outstanding wilderness area and  
 15 I recommend that the BLM purchase the mineral rights on White  
 16 Canyon and designate it or recommend it for wilderness status.

17 Coyote Mountains is another really exceptional  
 18 wilderness unit. It is difficult to comprehend why you'd  
 19 not recommend the area for wilderness. This exciting area  
 20 has exfoliated granite domes that are really reminiscent of  
 21 Yosemite National Park. It's got fifteen hundred foot  
 22 granite domes, it's an outstanding climbing area, and there  
 23 are essentially no conflicts in Coyote Mountains. To the  
 24 EIS it admits that there are no significant conflicts. It  
 25 is currently managed for back country use. And yet the EIS

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1 do not press the majority of the unit, only the lower  
 2 elevations of the unit. The unit is far too rugged to allow  
 3 RV use. You'd kill a machine in fifteen minutes in Coyote  
 4 Mountains.

5 MR. MCCLURE: Excuse me, Jim. You have one  
 6 minute.

7 MR. WOTENFELDER: Okay.

8 The historic mining occurred in the Bonanza  
 9 Mine area and there's little evidence to support that it has  
 10 future potential, so I really urge the Coyote Mountains be  
 11 recommended.

12 Barbary Cougar's Peak, (phonetic) we support  
 13 your recommendation for it and we also recommend that you  
 14 acquire the thirty-two hundred and forty-five acres of state  
 15 land adjacent to it that you talked about in the, I believe  
 16 it was the no-action alternative.

17 The Picocho Mountains, which I'm not quite as  
 18 familiar with, but I spent some time in it. It has  
 19 outstanding -- again, it says there's very little opportunity  
 20 for primitive recreation. There are some nice canyons in  
 21 there for that, and it has some of the most outstanding  
 22 wildlife of any unit in the state. It's got exceptional --  
 23 the highest desert tortoise population in the state, and  
 24 its other wildlife values should certainly be protected and  
 25 wilderness would be the best protection for that.

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1 And then Cripple --  
 2 MR. McCLORE: Excuse me again, Jim. Your time  
 3 is up, and if you'd like, you can submit a written statement.  
 4 MR. NOTESTINE: Okay, thank you.  
 5 MR. McCLORE: Thank you very much.  
 6 Our next witness is Janet Smith.  
 7 MS. SMITH: Thank you, Mr. McClure.  
 8 My name is Janet Smith, I'm the state president  
 9 of the Arizona Small Mine-Operators Association, which was  
 10 founded in 1938 and is the oldest mining organization in the  
 11 western United States.  
 12 I want you to know that it is a distinct and  
 13 unique pleasure for me to be able at long last agree with  
 14 some Bureau of Land Management recommendations.  
 15 First of all, I'd like to commend the Phoenix  
 16 District for the degree of professionalism we finally get to  
 17 see in the mineral summary in this EIS. We find the in-house  
 18 work to be concise, factual and comprehensive. We were  
 19 somewhat disappointed with the quality of the GEN reports,  
 20 and we feel that work of better quality at lower cost would  
 21 be done by geologists at the Bureau of Geology and Mineral  
 22 Technology. We do agree with BLM recommendations on Mount  
 23 Wilson, Hall's Canyon, White Canyon, Picocho Mountains and  
 24 the Coyote Mountains as being unsuitable for wilderness. I  
 25 must admit we arrived at the same conclusion by different

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1 taxpayers' money and your time to continue to inventory areas  
 2 that did not meet the requirements of this law.  
 3 Other reasons given for this wilderness  
 4 designation bears little logic. The Papago Tribe could have  
 5 at any time in the past, requested withdrawal through Congress  
 6 of this peak for addition to the Reservation and extension  
 7 of their boundary eastward.  
 8 There are vast deposits of strategic minerals  
 9 in evidence and documented on the Papago Reservation, yet  
 10 the Tribe has been unwilling to allow or encourage development  
 11 of minerals on the Reservation.  
 12 To classify this particular area as wilderness  
 13 only limits its potential for mineral development and limits  
 14 its use to single purpose, special interest groups.  
 15 Thank you.  
 16 MR. McCLORE: Thank you very much.  
 17 Next witness is Paul Hirt.  
 18 MR. HIRT: Now, when I did this myself, I ran  
 19 over ten minutes, so I guess I'll have to try to speak fast.  
 20 My name is Paul Hirt, and I'm very strongly  
 21 opposed to your proposed action in the EIS as well as your  
 22 entire philosophy behind it. You seem to favor complete  
 23 dissolution of wilderness resources in the DEIS area in  
 24 deference to exploitation of market commodities.  
 25 Your recommendation is for about one percent

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1 means, but we too feel that these areas are unsuitable for  
 2 wilderness designation.  
 3 We disagree strongly with your recommendations  
 4 on the Barbecue (phonetic) and do not find any merit in the  
 5 rationale used for circumventing the criteria laid down in  
 6 the Wilderness Act of 1964.  
 7 Although a quote, "highly scenic natural  
 8 landmark, well-known in southern Arizona," and quote, this  
 9 name peak is a volcanic intrusive with potential for halo  
 10 deposits and the grade of metamorphism in these various  
 11 boundings or halos around this intrusive has not been  
 12 adequately explored.  
 13 The potential for cobalt, vanadinites, celestite,  
 14 gold, silver, copper, lead, zinc and molybdenum are present  
 15 and documented. We are confident that the minerals inventory  
 16 when performed on this area will show economic quantities of  
 17 these strategic minerals.  
 18 Unfortunately, the only reason we do not have  
 19 active mining in this area now is that management agencies  
 20 have never been willing to expend funds to acquire access to  
 21 generate revenue on the public lands. Instead, it has been  
 22 the policy to lock out minerals and devote funds for access  
 23 to recreation and for special interest groups. This area  
 24 does not meet the size criteria mandated in the 1964  
 25 Wilderness Act, and we seriously believe it is a waste of the

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1 of the lands, the BLM lands covered in the DEIS area.  
 2 Wildlife, scenic and recreation and wilderness  
 3 resources seem only to be provided for when land is totally  
 4 useless or unwanted for anything else. And even sometimes  
 5 then you don't recommend them.  
 6 The proposed action goes in one direction only,  
 7 and that's development and commercial exploitation of  
 8 natural resources with only the barest minimum legal amount  
 9 of protection and preservation, in my opinion.  
 10 Now I'm not going to stand here and beg or  
 11 demand that you add a few more areas to your pitiful  
 12 recommendations, as I see it. Instead, I challenge the  
 13 validity of your entire land management orientation, of which  
 14 this DEIS is an expression.  
 15 I challenge it on legal grounds as well as  
 16 ethical grounds. Your clear charge as a public agency  
 17 managing public trust lands is not simply to provide every  
 18 possible opportunity for private, commercial exploitation of  
 19 natural resources. You have other mandates besides. Mandates  
 20 to provide ample amenity values, like scenic quality,  
 21 natural recreation areas, fresh air and solitude. You are  
 22 also required to provide for and preserve natural wildlife  
 23 habitat, vegetative health and diversity, and a variety of  
 24 recreational experiences. You are supposed to balance these  
 25 multiple uses in such a way as to provide the greatest good

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1 for the greatest number of Americans, without impairing the  
2 health and productivity of the land so that future  
3 generations are assured of a sustained quality environmental  
4 and a yield of resources. Now this you already know.

5 This philosophy is rightly identified as a  
6 utilitarian and anthropocentric philosophy of land use.  
7 Anthropocentric in that all decisions and values are related  
8 to man's needs and utilitarian in the sense that management  
9 is oriented towards providing that which is useful, that  
10 which has utility, or provides direct benefits to man. This  
11 anthropocentric utilitarian view is a narrow view that many  
12 people oppose. However, it is also a compromise point of  
13 view between a true environmental ethic and the robber baron  
14 mentality that seeks to maximize personal gain without  
15 regard for the land and its resources.

16 Now the daye of the Wild West are not so far  
17 behind us as it may seem. The great cattle kingdoms and  
18 water resource and mining empires have dominated the western  
19 politics and land use in the past still exert great  
20 influence in this state, as well as others. Even in their  
21 death throes, the mining and ranching and special interests  
22 command subsidies and legislation and land use decisions far  
23 out of proportion to their numbers, their economic  
24 contributions, or their benefits to society.

25 The BLM knows as well as anyone or better how

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1 to commercial exploiters.

2 Your proposed action doesn't only drop five of  
3 six acres (sic) from wilderness recommendation, but it  
4 intends additionally to change current management so that  
5 secondary or supplemental protection measures are also lifted  
6 from these five areas, exposing them to full exploitation.  
7 And I quote from your DEIS on the worst of these, Mount  
8 Wilson, on Page Nine. Your current direction, your current  
9 management says you're going to designate Mount Wilson as a  
10 wildlife management area for protection of bighorn sheep and  
11 other wildlife habitat. You will restrict RV use to existing  
12 roads and trails, and you'll eliminate cattle grazing and  
13 you'll restrict communication sites on Wilson Ridge, which is  
14 a highly scenic, highly visible geologic land form. Your  
15 proposed action does not just not recommend the area for  
16 wilderness, but your proposed action also opens the area to  
17 vehicle use, including ORVs, it says. It opens the area to  
18 new rights-of-way and it manages the area as visual resource  
19 management VNM Class Three. Which is second to the bottom.

20 Four other NSAs in this DEIS do exactly the  
21 same thing. They not only not recommend it for wilderness,  
22 but they open up the protection that was already there,  
23 including especially Coyote Mountain and Pinnacle Mountains.

24 This is not balanced management. These NSAs  
25 are not just any old BLM acreage. These are the very finest

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1 influential these self-serving and destructive industries are,  
2 especially in regards to public land use. But there is no  
3 longer any excuse for this situation to continue and I am  
4 damn tired of spending my spare time trying to force your  
5 agency to stand up to these abusive despots.

6 I'm also damn tired of reminding the BLM that it  
7 is no longer the grazing service, as it used to be called; that  
8 land disposal is no longer your purpose, as it was a half a  
9 century ago, and that you are incredibly slow to change and  
10 you still wail in the face of your responsibilities to halt  
11 public land abuses and protect resources.

12 The Wilderness Act was passed over twenty years  
13 ago. The legislative requirement that you study, recommend  
14 and manage for areas of wilderness is ten years past. It is  
15 the public's clear will and Congress has legislated that  
16 wilderness is a legitimate, multiple use, which should  
17 receive equal and balanced consideration along with other  
18 multiple uses. Now, recommending one percent of the BLM lands  
19 in the SIS area is not an equal and balanced consideration of  
20 multiple use. You have avoided or perverted this clear  
21 intent in every way possible, as I see it, from your  
22 inadequate inventory to your bias study, to your pitiful  
23 recommendations, to your liberal management policies. All  
24 your intentions seen aimed at establishing the minimum level  
25 of wilderness and resource protection while maximizing access

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1 of the last tiny remnants of undisturbed, roadless lands in  
2 the Phoenix and Kingman resource areas. They represent a  
3 minute percentage of the lands you manage, yet you fail to  
4 recommend wilderness for any of these, except for two  
5 thousand acres of Barbereauy Peak, an amount of land totally  
6 insignificant in the big picture. I don't know what your  
7 version is to preserving small areas in their natural  
8 condition, but whatever it is, I think it is probably  
9 indefensible.

10 You distort the intent of Congress and the public  
11 in several ways in order to justify your non-recommendations.  
12 One case in point is your criteria for evaluation of these  
13 areas. Page Three and Pages 36 and 37, where you discuss  
14 diversity and geographic distribution in the National  
15 Wilderness Preservation System. Now, the real intent for  
16 diversity and geographic distribution is to insure that eco  
17 systems, all eco systems in the Bailey-Kupler System  
18 (phonetic) if possible are represented in the National  
19 Wilderness Preservation System. Also, to insure that there  
20 is an adequate distribution of wilderness in your major  
21 population centers.

22 Now you take these excellent goals and you  
23 turn them inside out so they're used to justify not  
24 recommending areas if the eco types are already well  
25 represented and/or if another similar wilderness area exists

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1 nearby. For example, a major rationale for your not  
2 recommending Mount Wilson includes, quote: "An absence of  
3 special features or resource values unique to this area  
4 alone," end quote, Page Nine. Do you think that the National  
5 Wilderness Preservation System is supposed to have only one  
6 or two of each kind of area? This is a typical minimum  
7 level, lowest common denominator-type management, similar to  
8 what the Forest Service does with old growth and timber.  
9 For example, they established the minimum  
10 necessary habitat required to maintain the minimum legal  
11 populations of certain species, like the spotted owl. The  
12 same goes for geographic distribution, where you claim that  
13 wilderness is unneeded for certain WSAs because adequate  
14 wilderness of other agencies exist nearby.  
15 On the other hand, you obsessively maximize  
16 opportunities for mineral development and other resource  
17 development no matter how much nearby land is available and  
18 utilized; no matter how useless, how unlikely, how  
19 unprofitable, or how destructive this activity is, you  
20 still want to maximize it. Again, this is not balanced  
21 management. A reasonable view of balanced management within  
22 the anthropocentric utilitarian scheme would be to manage  
23 approximately a fifth of your lands as wilderness and target  
24 the remaining eighty percent for other multiple use emphases  
25 balancing wildlife and fish, water, timber and range resources.

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1 WSAs and not the BLM. If there isn't some affirmative move  
2 towards more preservation of wilderness and balanced multiple  
3 use, it is likely we will see each other again and again  
4 during Congressional oversight hearings, appeals and in court.  
5 Thank you.  
6 MR. MCCLURE: Next witness is Gertrude  
7 Hochgraf.  
8 MS. HOCHGRAF: I'm Gertrude Hochgraf, resident  
9 of the State of Arizona.  
10 These are my comments on the Phoenix Resource  
11 Area Wilderness Draft Environmental Impact Statement, 1984.  
12 The first section of the summary of this DEIS,  
13 purpose and need, indicates that two issues which I feel  
14 should be the top of the priority list for the establishment  
15 of wilderness areas were not considered, in quotes: "High  
16 concerns." These issues are watershed and wildlife. Later  
17 in the statement some data are presented on wildlife habitat  
18 and special status of a few species of plants and animals,  
19 but no data are presented indicating rainfall in these six  
20 WSAs, what aquifers these watersheds might feed, or whose  
21 water supply might be affected if mining, development and/or  
22 overgrazing occurs in these areas.  
23 Both of these issues, watershed and wildlife,  
24 were virtually ignored in the consideration for proposed  
25 action. As the human population of the State of Arizona

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1 Thank you.  
2 And as a start, I'd like to see all six areas  
3 in the DEIS designated plus the Ragged Top area, Squaw Tits  
4 and a few others, which I won't mention here. I'd like to  
5 quote some passages from legislation that governs your  
6 agency's mission and management, the Wilderness Act, Section  
7 2-A.  
8 In order to insure that an increasing population  
9 accompanied by expanding settlement and growing mechanization  
10 does not occupy and modify all areas within United States and  
11 its possession, leaving no lands designated for preservation  
12 and protection in their natural condition, it is hereby  
13 declared to be the policy of the Congress to secure for the  
14 American people and present and future generations the benefits  
15 of an enduring resource of wilderness.  
16 Your DEIS exhibits the same attitude that led  
17 Congress to pass a wilderness act. Your recommendations  
18 call for potential occupation or modification as stated in the  
19 Act, of ninety-nine percent of the BLM lands in the EIS area.  
20 Now, the people of this country do not want this type of  
21 management.  
22 Finally, as I've stated repeatedly, your  
23 policies do not represent a reasonable balance of multiple  
24 uses as mandated in the Federal Land Policy and Management  
25 Act. Thank God Congress makes the final decision on these

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Response  
HT 1

1 increases, more and more consideration must be given to  
2 maintaining areas for uncontaminated watershed. We are  
3 frequently told of increasing contamination of wells by  
4 leachate from mine tailings and strip mines, industrial and  
5 urban effluence and dumps, and non-point source contaminants  
6 from agriculture and road surfaces. In the future our  
7 water supplies both from wells and the CAP will have to be  
8 mixed with clean water in order to be usable for human  
9 consumption and agriculture. Other wells will have to be  
10 shut down. Wilderness areas may be our only sure source of  
11 clean water. As an example, consider the Picoacho Mountains  
12 WSA. As described in the DEIS, it is close to the Towns of  
13 Eloy and Picoacho and Interstate Highway 10, and is surrounded  
14 by croplands and grazing areas. The CAP canal will be built  
15 nearby. Wells now supply water for this area and in the future  
16 some water may be supplied by the CAP if there is water in the  
17 canal.  
18 As the fertilizers, pesticides, road runoff and  
19 salts from the CAP water seep into and contaminate the  
20 aquifer, the only source of uncontaminated water may be from  
21 the Picoacho Mountains and Picoacho State Park areas.  
22 If mining for the extraction of copper and zinc  
23 is allowed in the Picoacho Mountains area, contamination will  
24 increase due to mine tailing leachate and other materials  
25 produced by human disturbance. There is a very strong

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1 possibility of poor water quality in this region and in other  
2 parts of the state in the future unless more areas are  
3 managed for uncontaminated watershed. We need not only the  
4 six WSAs listed in this DEIS, but also larger BLM wilderness  
5 areas for future clean water supply.

6 The fact that one can hear trains, cars and  
7 planes or can see human structures from the peaks or that there  
8 are few exploratory mine holes in the area, has no bearing  
9 on wilderness value as watershed. Native plants and animals  
10 are resources, just as much as minerals and energy materials.  
11 Studies of arid land plants show the value of using some  
12 native plants as human food, thereby reducing the amount of  
13 water necessary to grow these plants as compared to water used  
14 on crops we are growing now.

15 Other studies of plants show that some have  
16 previously unknown medicinal value and may be breakthroughs  
17 in curing or preventing human diseases. Animal physiology  
18 studies have increased our knowledge of the operation of  
19 human organ systems. Some of these are desert animals whose  
20 adaptations to the high temperature-low water environment  
21 have helped us understand respiratory, circulatory and  
22 respiratory systems. Other animal studies have discovered  
23 materials in blood or tissues which can be synthesized and  
24 used for human medicinal purposes. Both plants and animals  
25 are used as biologic controls. More studies of this will

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1 wildlife is listed in the DEIS, exploration of this area has  
2 shown large numbers of raptors and other birds living in the  
3 area, and with its perennial water source, it must have many  
4 other animal populations. But most importantly it is an  
5 attraction and food source for migratory birds, both water  
6 fowl and others.

7 Riparian (phonetic) habitat is rapidly being  
8 destroyed in Arizona, and in many cases being replaced by  
9 lakes formed by dams. Since these lakes are used for  
10 agricultural water supplies, flood control, and in a few  
11 areas, power, their levels change drastically. Their shore  
12 areas are biological deserts; that is, they are neither  
13 aquatic systems nor terrestrial systems, and therefore supply  
14 little food for wildlife. Every remaining riparian area in  
15 Arizona must be preserved, including White Canyon. We cannot  
16 live without migratory birds. These animals are the major  
17 biological control of insects. Native plants and animals are  
18 resources, just as much as minerals and energy materials. We  
19 do not know now which ones we might need in the future for  
20 food, medical purposes and biological controls, just as we do  
21 not know now which mineral and energy materials we might need  
22 in the future.

23 We have been rapidly depleting the habitat of  
24 native plants and animals by mining, overgrazing and  
25 developing for human habitation in most of the State of Arizona.

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1 enable us to reduce the use of chemicals which are not species  
2 specific and are toxic not only to the target species but  
3 to other plants and animals, including humans.

4 In the future some of our native animals may  
5 be used as a human food supply replacing our present  
6 domesticated animals, which are not adapted to the desert  
7 environment and destroy its vegetation. Native animals  
8 would be more efficient in the fragile environment of the  
9 Sonoran Desert. It behooves us to maintain diverse gene  
10 pools of both plants and animals so that if we use these for  
11 food, medicine or biological controls, we will have various  
12 gene pools that can adapt to natural changes in climate and  
13 habitat.

14 Again, taking the Picoacho Mountain WSA as an  
15 example, this area supports populations of desert tortoise,  
16 Gila monster, kit fox and five species of gene animals, as  
17 well as many bird species. It is also an area where bighorn  
18 sheep might be reintroduced, since it once supported these  
19 animals.

20 There are other areas in Arizona and other  
21 states where these animals exist, but unless we preserve the  
22 Picoacho Mountain population, we will reduce the diversity  
23 of gene pools. The same is true for its plant populations.  
24 Of the six WSAs, the one that is most important for wildlife  
25 preservation is White Canyon. Although no special status

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1 We should now retain the remaining comparatively  
2 undisturbed areas for biological resources. All of the six  
3 WSAs listed in this DEIS should be managed as wilderness,  
4 to diversity gene pools. Additional areas should also be  
5 studied and other larger areas be designated wilderness for  
6 uncontaminated watershed and diverse population of plant and  
7 animal wildlife.

8 The proposed action of this DEIS shows the  
9 blindness of the Bureau of Land Management to our ecological  
10 problems.

11 Thank you.

12 MR. MCCLURE: Thank you.

13 Next witness is Pete Peterson.

14 MR. PETERSON: Gentlemen, Mr. McClure, if I  
15 remember your name right, ladies and gentlemen.

16 A couple hours ago I come from up in the desert  
17 so this is kind of a cultural shock, so bear with me a little  
18 bit.

19 The first thing I'd like to ask is a question  
20 of you. And that has to do with the Treaty of Hidalgo  
21 Guadalupe. This area came under the control of the United  
22 States Government in the 1850s and one of the provisions  
23 under this treaty was that there would be no restriction of  
24 the rights of those people living here to move on either side  
25 in the desert. Do you know -- I haven't had time to go to

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1 the University and research that particular point -- but do  
2 you have any information on that?  
3 MR. McCLURE: We're here to hear your comments.  
4 I appreciate that.  
5 MR. PETERSON: All right.  
6 As near as I've been told that this is the case,  
7 that there is a point of access to the descendants of those  
8 people that were living here. I've been in contact with some  
9 of them in the Mexican community, and others within the  
10 Indian community, and these maps you have up here, the boundary  
11 lines -- the one thing that is most out of on all the maps  
12 I've seen is Sonora. It's part of the same desert. We have  
13 a bumper sticker out here that says Sonoran Desert, Love it  
14 or Leave it. And very little attention is paid to the people  
15 in the other part of the desert. They are affected quite as  
16 much as we are by the decisions that are taken by your office  
17 and by other state governments here.  
18 The generating plant up there in Palo Verde, for  
19 instance, and there's other talk now, too, of a disposal  
20 site in southern Utah, which would affect the water courses  
21 throughout the entire Sonoran Desert. And it seems to me  
22 that every time that the status of a piece of land changes,  
23 it goes from one hand to another hand, with the net result  
24 is that the people have less to work with than they had  
25 before. The wealth that we have in this desert -- look at the

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1 a month are coming here. The question is: how long can we  
2 overpopulate it ourselves. It's fragile. We need to  
3 utilize it to the -- its fullest potential. The water  
4 resources. Hydrologists tell us that one-half million  
5 people could live in Tucson, if we would just redesign our  
6 streets and collect the water. I think that there's great  
7 opportunities for the desert. And I think that as people  
8 begin to realize who they are and where you are, the only  
9 reality is the ground we're standing on. The state, the  
10 federal government is carrying paper on it. And we need to  
11 take a look at it and protect it, care for it, not exploit  
12 it. Love it or leave it.  
13 Thank you.  
14 MR. McCLURE: Thank you.  
15 Next witness is Charles Hofferl.  
16 MR. HOFFERL: Correct.  
17 Thank you people for putting up with the endless  
18 list of people that come forward and talk, but I think after  
19 that last one that I would have to do some considerable  
20 thinking and maybe submit my findings in writing.  
21 Thank you.  
22 MR. McCLURE: Thank you.  
23 Marty Wilson.  
24 MR. WILSON: I too will submit my comments in  
25 writing.

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1 copper mines. This is one of the wealthiest places on earth.  
2 We all speak of roughly the same thing. We want to preserve  
3 our environment. I do not agree with this type of mining  
4 that we have south of town. This was a political concession.  
5 It's an ecological disaster. But I do believe that the  
6 wealth that is contained within the ground, within this  
7 desert, can be extracted without destroying the surface  
8 environment. And toward that end is what I am looking  
9 forward and toward and I would hope that even my approach to  
10 technology will be able to be implemented before this is  
11 entirely blocked out, where we have paved roads and  
12 interstates to drive on. We can look at pictures and videos  
13 of somebody that went there. But it doesn't replace actually  
14 going there. But for many of us, as we get older, it's not  
15 as easy to walk and especially carry a pack on your back, but  
16 I think that these provisions can be made. Transportation or  
17 access into these regions so that the people who live here  
18 can actually go in and see and experience, but yet we can  
19 live in harmony, in balance, with our environment.  
20 We must have a change. I think the governor of  
21 this state and the governor of Sonora really should be  
22 working in much closer cooperation. Both our federal systems  
23 turn deaf ears. The immigration problem from south of the  
24 border is not really as serious as our own migration of our  
25 own race into this desert. Something like two thousand people

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1 MR. McCLURE: Thank you.  
2 Michael Stamps.  
3 MR. STAMPS: I have really quite a brief  
4 statement.  
5 Basically, I just would like to state that I  
6 vehemently oppose the draft EIS recommendations for  
7 consideration for wilderness only the Barbecubre (phonetic)  
8 WSA, on the basis of the extreme need for additional  
9 wilderness areas, both for the preservation of the resources  
10 contained therein and the preservation of areas to which we  
11 can escape from this urban blight. And I would like to say  
12 that I support the All-Wilderness Alternative which includes  
13 the six WSAs being studied and the Paged Top.  
14 Basically, as one of the owners of those areas,  
15 I feel like they should be protected under wilderness status.  
16 Thank you.  
17 MR. McCLURE: Thank you.  
18 Donald Janson.  
19 MR. JANSON: My name is Don Janson. My wife  
20 and I have a cattle ranch in the Barbecubres. We have some  
21 BLM lease which we very lightly graze, it's sort of a buffer  
22 zone between us and the Papago Reservation to keep strays  
23 from getting too far. They have trouble going over the  
24 cliffs. I also treasure the Southern Arizona Cattlemen's  
25 Protective Association. We've owned the ranch about twenty

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1 years and the only hunting I've ever done, I shot one  
2 rattlesnake, one skunk and one rabbit. I regret shooting the  
3 rattlesnake and the skunk. The rabbit was for a starving  
4 wetback.

5 We put out more salt blocks and try to improve  
6 more watering places for wildlife on the BLM land and on our  
7 own than actually are needed for the cattle. We've got over  
8 the years -- we've seen the numbers and variety of wildlife  
9 increase. We see jaguars, mountain lions, eagles, coat-  
10 oundis, Mexican wolves, which are supposed to be extinct, and  
11 recently some panthers and, although these are predators, and  
12 I'm sure we're losing more than our share of calves, we like  
13 to see the wildlife, too. We'd rather be poor and see the  
14 wildlife, than make more money and get rid of them.

15 There's a couple of problems that I don't know  
16 how it would be handled. One is because of the inaccessibility  
17 of the area. The trails through the mountains are referred to  
18 by some Mexicans as the Ruta Mafiosa, because of the large  
19 amount of drug smuggling. One law enforcement official told  
20 me that the largest amount of drugs, hard drugs, in the  
21 country goes through these mountains. I've been shot at  
22 enough times that I'm almost used to it. I'm not like  
23 Churchill, who said: I like to hear the whistle of bullets  
24 going over my head. I'm not that brave yet. The criminal-  
25 type activities, I've written to the BLM and my reply was I

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1 in hauling the stuff out and we make a few bucks on bear cans,  
2 too, just thrown all over the place.

3 Now if the BLM can't police the area and make  
4 it criminal-proof, I don't think they should make it more  
5 accessible, and if wilderness is the answer, I guess that  
6 may be the best way.

7 And I also think the Papagos have some rights,  
8 too. It's a sacred area and more people swarming over it is  
9 not going to improve the sacredness of the area.

10 Also, I don't know of any area that's been  
11 improved by mining above-ground or underground, and I have  
12 never chased out anybody that wants to go up with a pan and  
13 look for gold and make less than minimum wage, or something  
14 like that, but -- I've never denied anybody access to our  
15 land for hunting that acted in the least way decent. But  
16 there are so many people that are just not conducive to  
17 improving or keeping an area nice and that's about all I have  
18 to say.

19 MR. MCCLURE: Thank you.  
20 Nancy Janson.  
21 MR. JANSON: I spoke for her.  
22 MR. MCCLURE: Okay.  
23 Tim Flood.  
24 MR. FLOOD: Thank you.  
25 Nowhere in the draft EIS COULD I find a statement

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1 should report these things to the Border Patrol. The Border  
2 Patrol is about as much help, and I think we could get more  
3 help from the Campfire Girls, and it's not really their  
4 jurisdiction, the drugs, their area of enforcement is a ten-  
5 mile wide band along the border and this is above that.

6 Another law enforcement official told me that  
7 if I knew everything that was going on in the Barbecoera I'd  
8 be afraid to go in there. I assume he's talking about the  
9 drug traffic.

10 The other criminal activity is the periodic  
11 swarming into the area of hunters who in some way are  
12 psychopathic. They like to shoot at anything that moves and  
13 I've raised enough hell with them that sometimes I like to  
14 think that the bad hunters are dwindling. But recently it's  
15 picked up and recently looked like one case of attempted  
16 murder when a subcontractor building a horse corral had his  
17 trailer shot through with a high powered rifle. State signs  
18 about camping near water holes are vandalized. If you'd like,  
19 I'd go out in my car and bring in a mail box that's like a  
20 sieve from bullet holes. Now, these aren't sportsmen and I  
21 don't know what the answer is. But I think one thing that we  
22 shouldn't do is do anything to make the place more accessible  
23 and I think accessibility and more people just make it worse.  
24 We can always tell when the hunting season is on, the trash is  
25 just all over the place. We do our share, more than our share

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1 as to the total acreage under management by the BLM's Phoenix  
2 District. What percent of the total acreage managed by the  
3 BLM does the 14,713 acres of wilderness study area represent?

4 From the enclosed wilderness status map in the  
5 draft EIS, the areas studied appeared to represent a quite  
6 small proportion. I'm opposed to the proposed action of  
7 wilderness designating 2,000 acres of the 55,000 acre study.  
8 I believe the proposed action is based on an undervaluing of  
9 the importance of wilderness lands, to preserve Indian  
10 environmental quality and to the desires of the American  
11 people for outdoor recreational opportunities. The importance  
12 of wilderness will only increase with the pressures of  
13 increased population.

14 I am most familiar with the White Canyon  
15 wilderness study area and am impressed by the presence of  
16 the perennial and uncontaminated stream and outstanding  
17 riparian habitat. None of the other wilderness study areas  
18 appear to possess such features. Since water quality is so  
19 important for maintaining the diversity and quantity of  
20 sensitive plant and animal species, I believe that White  
21 Canyon is highly suitable for wilderness and should be  
22 included in the areas designated as wilderness.

23 Having reviewed the alternative uses and  
24 potential degradation to wilderness values that will follow  
25 should the other five wilderness study areas not be included

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1 as wilderness, I recommend that the BLM support all the  
2 wilderness study areas as wilderness.

3 Thank you.

4 MR. McCLOURE: Thank you.

5 Next witness is R. W. Staggegan.

6 MR. STAGGEMAN: I'll submit my comments in  
7 writing.

8 MR. McCLOURE: Thank you.

9 Jake Turin.

10 MR. TURIN: Thank you.

11 My name is Jake Turin. I'm a Tucson resident,  
12 citizen of the Earth.

13 First of all, although I compliment you on the  
14 research that went into the document, I must protest  
15 strongly against the final proposed action. I believe in a  
16 strong wilderness program in Arizona and thereby urge  
17 adoption of the All-Wilderness Alternative, as well as  
18 reconsideration of the Ragged Top area.

19 As Arizona's population continues to grow, and  
20 development pressures extend further and further out from the  
21 cities, the need for federally protected wilderness area  
22 increases.

23 I'd like to comment at length on the WSA I'm  
24 most familiar with, the Coyote Mountains. There are many  
25 reasons that this area is suitable and desirable as wilderness

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1 million miles away. From Mendocino Canyon the only trace of  
2 man's activities in view is an old water storage reservoir  
3 dammed with a beautiful rock wall. Far out across the valley  
4 you can see the Sierras and behind you are the massive  
5 granite domes that seem to invite you further up the canyon,  
6 where hiking, backpacking and rock climbing opportunities  
7 await. If you're there this time of the year, you're  
8 surrounded by the sound of running water as streams that drain  
9 the high peaks come down the canyon. Birds as everywhere and  
10 tracks in the sand testify to the presence of larger wildlife.

11 Yet, despite all this, the BLM has seen fit to  
12 declare the Coyotes as unsuitable for wilderness. Why?  
13 Because you claim that the WSA small size would lessen the  
14 area's solitude value. I agree. A larger area would be  
15 better. And I urge the BLM to investigate the possibility of  
16 acquiring some of the surrounding state land, via land swaps.  
17 But in the meantime, full steam ahead for wilderness.

18 In my experiences, I've not had any problems  
19 running into other hikers in the Coyotes and the area is so  
20 rugged that I doubt that I will. And if, at some point in the  
21 future, the wilderness seeking population has grown so much  
22 that the solitude of the area is being impaired, surely we  
23 will then be thankful for the wilderness areas we have set  
24 aside, and regret those that we've lost.

25 In summary, let me again support the All-

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1 Most of them are pretty well discussed in the DEIS. On the  
2 other hand, I could find few, if any, good arguments against  
3 wilderness in the paper. I'm somewhat at a loss, therefore,  
4 to understand the BLM's final recommendation to open the  
5 Coyote Mountains up to increased development and exploitation.  
6 The Coyote Mountains contain some of the most spectacular  
7 rock formations in the southwest. Immense granite outcrops  
8 that have been compared to Yosemite. The mountains are home  
9 to eight special status wildlife species and eight protected  
10 plants, as well as desert bighorn, mountain lion, white-  
11 tailed deer and desert tortoise. The WSA has up until now  
12 nearly escaped grazing and therefore provides a useful  
13 example of the natural vegetation this region would usually  
14 have.

15 Wilderness designation would also protect a  
16 classic Hohokan archeology site. According to the document,  
17 conflicts with mining interests are thought to be  
18 inconsequential, and the BLM itself reports that wilderness  
19 designation would present no management difficulties  
20 whatsoever. These technical matters aside, I'd like to speak  
21 about the area in a more personal way. The Coyote Mountains  
22 are a fantastic place to visit, and I want them to stay that  
23 way. From here to Mendocino Canyon, which would probably be  
24 the main access to the area, it's just about one hour's  
25 driving time. But once you're there, you might as well be a

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1 Wilderness Alternative, and especially urge full wilderness  
2 protection for the Coyote Mountains.

3 Thank you.

4 MR. McCLOURE: Thank you.

5 Next witness is David Goldstein.

6 MR. GOLDSTEIN: My name is David Goldstein.

7 When I look at the draft Environmental Impact  
8 Statement, I'm struck primarily by the short sightedness and  
9 narrow mindedness of the recommendations in this impact  
10 statement. The mandate of the Bureau of Land Management is  
11 to protect public lands from multiple use to benefit all of  
12 the public, not just the development interests. And  
13 wilderness is one of the valid multiple uses mandated by  
14 Congress and by the public. The small size of the portions of  
15 land recommended by the BLM for wilderness is appalling, and  
16 the recommendation for wilderness of an even smaller area  
17 out of these parcels is indefensible.

18 I would support the All-Wilderness Alternative  
19 as a step in the right direction towards protecting our  
20 public lands. Now, one of the functions of wilderness  
21 designation is protection of critical habitats in Arizona  
22 and elsewhere, and I would like to comment briefly on two  
23 of the wilderness study areas in this respect.

24 The first of these is the White Canyon study  
25 area, and here, as several people have already mentioned, we

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1 have a perennial stream which any of the different sorts of  
2 wildlife habitats that we have in Arizona has to be the most  
3 critical. It's critical as watershed for the human  
4 population, and it's extremely critical for many of the  
5 wildlife species which live in our deserts. Now perennial  
6 streams and all sorts of riparian habitats are a very  
7 limited commodity in southern Arizona and it's imperative  
8 that we protect them when we have the chance and this is  
9 probably one of the best chances we have and will have for  
10 quite some time to come. And I think that this is an  
11 extremely important area to designate as wilderness.

12 The second wilderness study area I'd like to  
13 comment on is the Piacacho Mountains, and here, again, this  
14 is a critical habitat. A couple of people have mentioned  
15 already that this area has the highest concentration of  
16 desert tortoises in Arizona. Now, I believe that it's worth  
17 designating this area as wilderness simply to protect this  
18 sensitive species. But I also believe that an unusual  
19 concentration of an animal like this in the area is  
20 indicative of some special feature of the habitat, besides  
21 the animal itself. And we may not have studied the area well  
22 enough to be able to identify what this feature is, but I  
23 think, once again, the Piacacho Mountains study area  
24 represents a critical habitat with special features, and again,  
25 it's imperative that we protect this area while it's available.

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1 1978 proposal. It was originally listed as 8400 acres.  
2 This was later whittled down to 44. Four thousand four  
3 hundred and sixty acres. Your former leader, James Watt,  
4 I believe, asked that all areas of five thousand be dropped.  
5 This man stepped down as public outcry, maybe his lack of  
6 confidence. If you can't find the 540 acres to bring it up  
7 to five thousand as listed, I'd be glad to help.

8 And in summary, I support the six areas and  
9 Ragged Top.

10 Thanks.

11 MR. McCLURE: Thank you.

12 Next witness is James Hearings.

13 MR. HEARINGS: Well, I hope to be rather brief.  
14 I wasn't sure of what I was going to say, so I took some  
15 notes, and if I sound a little ramby, it's because of that.

16 Oh, by the way, my name is James Hearings. I  
17 have an "A" on the end of it there.

18 I guess I'm -- I kind of don't like to see  
19 wilderness areas because I feel that the way they are  
20 structured at least under the present Congressional action,  
21 they're withdrawn, as far as I'm concerned, virtually forever,  
22 from what I call general multi-purpose use. Now I realize  
23 that if a person is young and vigorous and can get out there  
24 and hike these hills and do that, that's great for him,  
25 perhaps. Now, when I was young and vigorous, I didn't have the

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1 So in summary, once again, I'd like to urge the  
2 All-Wilderness Alternative and these two areas in particular.  
3 Thank you.  
4 MR. McCLURE: Thank you.  
5 The next witness is Peter Fordyce.  
6 MR. FORDYCE: My name is Peter Fordyce, and my  
7 comments will be brief.  
8 First of all, I'd like to state that I view  
9 the EIS as a limited proposal. I think at the start I'd like  
10 to see the overall land area increased. I support the six  
11 areas that are listed there, and in addition, I support one  
12 that was dropped in the 1978 proposal, and that's Ragged Top.  
13 I'd like to comment on two of these areas, that  
14 of White Canyon, and that is on pages 10 and 26 of the EIS.  
15 You state that the opportunity for solitude and primitive  
16 recreation is restricted and limited. I strongly disagree  
17 with this. I find the area to have very scenic qualities.  
18 You have an area with a perennial stream that attracts large  
19 diversities of wildlife, and I think that when you weigh this  
20 with the, as you state on Page 13, moderate to high  
21 favorability for metallic and mineral resource development.  
22 I think the choice should be clear that we need to save the  
23 White Canyon area.  
24 The other area I'd like to comment on is that  
25 area that you dropped, the Ragged Top area. That was in the

Response  
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1 time or the money. That was my problem. I had to work too  
2 hard for a living. But now that I'm a little older I like  
3 to get out there some. But I can't walk ten miles up the  
4 mountain, so I like to have some roads where I can take my  
5 wife along and perhaps some friends. Now when you put it  
6 into a wilderness, I can no longer do that. So --

7 The other thing is I feel that the BLM is  
8 charged righteously with multiple use. And these people are  
9 saying, well, you know, you're not giving it a fair share.  
10 As one gentleman said, the greatest good for the greatest  
11 number of people. Well, I feel that multiple use, via the  
12 routes of forestry or mineralization or whatever, that's doing  
13 the greatest number of people the greatest good. Because if  
14 we didn't have minerals and whatnot, where would our space  
15 program -- where would we be today. We wouldn't have half  
16 the things we've got. And if we take these areas out of the  
17 availability to the industry, and I don't represent industry,  
18 by the way, we might be at the mercy of foreign countries  
19 for supply. Now, perhaps we don't need them today, as one  
20 gentleman said. There's an abundance of copper. It's a drug  
21 on the market, almost. There may come a day when we will  
22 need it, and I would hate to see a crash program held up  
23 because these areas have been unavailable.

24 Now, I'm not saying that we shouldn't restrict  
25 them to a sense, but to make them unavailable, and then to try

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1 and get a crash program going in the event of war or whatever,  
2 and it takes years to sometimes develop these things, so I  
3 feel that withdrawing them via the wilderness route is not  
4 in the best interest of the people of the United States, very  
5 frankly.

6 Well, I guess that's my opinion, in general.  
7 Thank you very much.  
8 MR. McCLURE: Thank you.  
9 Are there others that would like to speak?  
10 Next witness, I believe, is Jim Hencu (phonetic).  
11 MR. HENCU: I would like to submit my comments  
12 and opinions in writing.  
13 MR. McCLURE: Thank you.  
14 Bob Foster.  
15 MR. FOSTER: Good evening, my name is Bob  
16 Foster, I'm an emergency room physician in Tucson, and I've  
17 practiced emergency medicine here since 1978.  
18 And I would like to echo the thought that  
19 development in southern Arizona and the southwest should  
20 represent the greatest good for the greatest number of people.  
21 The people I would like to represent then are those who are  
22 benefited by both the growth in Tucson and the recreation  
23 industry, and the preservation of wilderness as wilderness.  
24 I would like to state at the outset that I  
25 recommend that all the six wilderness areas be held as

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1 have no overwhelming forestry values, and besides that, the  
2 recreation value to southern Arizona, which is a multi-million  
3 dollar industry, the value to the educational facilities of  
4 southern Arizona, the universities and high schools, whose  
5 field trips I have participated in and lectured in about the  
6 value that is unknown to the future generations of America,  
7 far outweigh the very limited value to a very small number of  
8 elite people, small miners and perhaps a few mineral interests.  
9 It simply doesn't compare. As wilderness, these things go  
10 on giving forever. As a one-shot developed area they have  
11 a very limited value and one which once developed no longer  
12 produces anything for anyone.

13 The greatest good for the greatest number of  
14 people would be represented by their maintenance as wilderness  
15 areas.  
16 Thank you.  
17 MR. McCLURE: Thank you.  
18 Next witness is Tim Vanderpool.  
19 MR. VANDERPOOL: My name is Tim Vanderpool, I'm  
20 an unfortunate ex-oilman in the great white wasteland known  
21 as Phoenix.  
22 And I'm here tonight in support of all these  
23 wilderness areas. I think all six WSAs deserve to be  
24 included in this recommendation.  
25 It's unfortunate that after the stepdown of the

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1 wilderness, as well as any number of other areas in Arizona.  
2 I would like to justify this on the grounds that -- on the  
3 only grounds that seem to be valid to the Reagan  
4 Administration, and that is money, fiscal grounds, in other  
5 words. The groups that would benefit monetarily include the  
6 emergency medicine physicians and hospitals of southern  
7 Arizona. I very rarely see small miners in the emergency  
8 room. I very commonly see rock climbers, hikers, and other  
9 individuals who value wilderness as wilderness and value  
10 the areas which surround them, in a pristine and undeveloped  
11 state.  
12 The ranchers of Arizona have also been my  
13 patients from time to time, with various things, including  
14 rattlesnake bites, and I think all of the ranchers of Arizona,  
15 especially those who have practiced ranching as a family  
16 business and not as an agri business, know the value of  
17 an eco system in which there are other things for coyotes  
18 to eat besides their calves and lambs. The hospital business  
19 is not the only industry which benefits. I would state that  
20 on a fiscal basis, if we rent the value to the photography  
21 stores, the recreation equipment stores, the medical supply  
22 facilities and their knee braces and wrist braces, all of  
23 these things far outweigh the very limited value of very  
24 specific and very small acreage areas under proposal tonight.  
25 They have no overwhelming mineral values; they

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1 big chief Jim, that these policies continue to be carried out.  
2 I thought the public outcry was enough at the time to perhaps  
3 make people realize that there was a support in this country  
4 for wilderness areas. And yet, we see the Bureau of Land  
5 Management turn around again and again, these proposals are--  
6 I mean, it's just like the last time. It's pro-business, and  
7 you cannot even look at them and say that it's not. It's so  
8 blatant to a person that actually gets out and looks at these  
9 areas, actually hikes these areas, which I assume that you  
10 gentlemen have hiked these areas from time to time. But, you  
11 know, they just fell short. As far as solitude, these areas  
12 offer solitude, you know. I mean, what is solitude? Is that  
13 sitting, you know, in your bedroom and listening to the cars  
14 go by? I mean, it's such an ambiguous thing.  
15 Solitude can be found in any of these areas. As  
16 far as one area I'd like to talk about in particular is the  
17 Coyote Mountains. This mountain says in your actual EIS, it  
18 says, you know, good conditions for wildlife, possible bighorn  
19 habitat, more species of big game than any other WSA, including  
20 white-tailed deer, haveline, mountain lion, vegetation, and  
21 yet it's not recommended. Why?  
22 And there are other people tonight who have  
23 talked about the general good that wilderness is supposed to  
24 do for people. We're talking about wilderness areas that have  
25 been developed for millions and millions of years, I mean,

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1 billions of years before we were ever here, before United  
 2 States was, you know, ever flickered in George Washington's  
 3 eyes, these areas existed, and I think it's about time that  
 4 Americans get the idea that wilderness exists above our petty  
 5 uses for today. They exist. You know, we want to go out and  
 6 rape the land for mineral resources, you know, so we can,  
 7 you know, avoid, you know, having conflicts in the world  
 8 market. I mean, you fail to see the big picture. The big  
 9 picture is that these wilderness -- we have no right, and we  
 10 have no right to go in and use them just for our unblatant,  
 11 materialistic reasons, because, you know, they deserve better  
 12 than that.

13 This country deserves better than that, and they  
 14 deserve better than the work that the Bureau of Land  
 15 Management has been doing for us so far. If people became  
 16 educated in this country, that's what really -- I mean, down  
 17 to the facts of what really is involved here, you know, I  
 18 think that maybe they would see the bigger picture. Obviously  
 19 at this time, maybe they don't. Maybe we are elite in the  
 20 fact that we actually take the time to drive out and walk in  
 21 these areas. If that's elite, well, I'm pretty goddam glad  
 22 that I am elite. Maybe sooner or later more people will get  
 23 out and do that.

24 Thank you.

25 MR. McCLURE: Thank you.

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 5  
 6 CERTIFICATE

7  
 8 I CERTIFY that I took the foregoing matter in  
 9 shorthand, that the same was transcribed into typewriting  
 10 under my direction, and that the foregoing 53 pages of  
 11 typewritten matter contain a full, true and accurate  
 12 transcript of all proceedings had and adduced upon the  
 13 taking of said matter, all to the best of my skill and ability.  
 14 DATED at Phoenix, Arizona, this 27 day of February,  
 15 1985.

16 *Wendell D. Ogden*  
 17 \_\_\_\_\_  
 18 Court Reporter

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1 Are there others that have not spoken this  
 2 evening that would like to speak now?

3 Pete Peterson asked to speak again. Is he  
 4 still here?

5 Well, we want to thank all of you for coming out  
 6 tonight. Your comments and your written submissions will be  
 7 given full consideration. The record will continue to be  
 8 open through March -- up until March 15th. We welcome any  
 9 of your comments and again, I want to thank you for coming  
 10 out tonight.

11 (Whereupon the hearing was closed at 8:30 p.m.)

12 \* \* \*

1 UNITED STATES DEPARTMENT OF INTERIOR  
2 UNITED STATES BUREAU OF LAND MANAGEMENT  
3 PHOENIX DISTRICT OFFICE  
4

5 310 North 4th Street  
6 Kingman, Arizona  
7 Tuesday, February 5, 1985  
8 7:12 o'clock p.m.

9  
10  
11  
12 TRANSCRIPT OF PUBLIC HEARING  
13 MT. WILSON WILDERNESS STUDY AREA  
14

15  
16  
17 BEFORE: BEAUMONT C. MCCLURE, HEARING OFFICER  
18  
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CLAYTON W. SWARTZ  
Certified Shorthand Reporter  
1385 Wagon Trail Road  
Kingman, Arizona 86401

1 P-R-O-C-E-E-D-I-N-G-S

2 Kingman, Arizona  
3 February 5, 1985  
4 7:12 o'clock p.m.

5 PRESENT: BEAUMONT C. MCCLURE, Hearing Officer.

6 WILLIAM K. CARTER, Team Leader, Phoenix, Arizona.

7 RICH HANSON, Wilderness Specialist.

8 ROGER TAYLOR, Area Manager, Kingman Area Office.

9 MIKE KLIDMANN, Outdoor Recreation Planner, Kingman  
10 Area Office.

11 THE HEARING OFFICER: Good evening. The Public Hearing  
12 will now come to order. I'll introduce myself. My name is  
13 Beaumont McClure, and I am the Deputy State Director in Charge  
14 of Lands and Renewable Resources for the Bureau of Land  
15 Management in Arizona.

16 I have been appointed by the Arizona State Director of  
17 the Bureau of Land Management to conduct this Public Hearing  
18 under the authority of the Secretary of the Interior concerning  
19 the Wilderness Study of the Phoenix Resource Area.

20 Most of you have undoubtedly signed the attendance sheet  
21 as you came in the room. If you have not done so, I would  
22 like to encourage you to sign it now so that we can have a  
23 written record of the attendance here.

24 If you would like to make a statement this evening, be  
25 sure to check the appropriate place on the attendance sheet

1 so that we can add your name to the list of speakers.

2 The Official Reporter this evening is Clayton Swartz.  
3 He is seated on my far left. He will prepare a verbatim trans-  
4 script of everything that is said at the hearing this evening.  
5 If you wish to obtain a copy of the transcript, you should  
6 make your own arrangements with the Reporter.

7 This Public Hearing is required by statute, and is being  
8 held to obtain information regarding six wilderness study areas  
9 which have been studied by the Bureau of Land Management. A  
10 Draft Environmental Impact Statement which I have on this sub-  
11 ject has been published and is available to the members of  
12 this room.

13 The purpose of this hearing is centered on two issues.  
14 First, are these six wilderness study areas suitable or not  
15 suitable for designation as a wilderness? Your views and any  
16 information you can offer with respect to this question will be  
17 greatly appreciated.

18 Second, is the Draft Environmental Impact Statement ade-  
19 quate? Your comments and suggestions on this aspect of the  
20 subject will also be appreciated.

21 In arranging for this Public Hearing notices were sent  
22 to United States Senators Goldwater and DeConcini, and to  
23 Representatives Udall, Rudd, Stump, McInty and McCain, and  
24 Governor Rabbitt, and other elected officials. Notices also  
25 have been sent to Federal, State and local governmental

1 agencies and organizations and individuals known to be  
2 interested in this wilderness study.

3 Now for a few words about the procedure. This hearing  
4 is not a debate, a trial, or question and answer situation.  
5 It is an advisory hearing, and all interested persons may  
6 present statements either written or oral or both, or other  
7 information pertinent to the wilderness study we are consider-  
8 ing tonight.

9 There will be no cross-examination from the audience,  
10 but if anyone fails to understand the statement of any speaker,  
11 he may direct a clarifying question to me, and I will determine  
12 whether it is pertinent. This may seem overly formal, but it  
13 is intended to give everyone a fair and reasonable opportunity  
14 to present his or her views.

15 When I finish my opening statement I will call on a  
16 Bureau of Land Management representative to explain the BLM  
17 wilderness study process up to this point. That presentation  
18 should take just about five minutes.

19 Then I will call on any elected government officials  
20 present who wish to make a statement. After that we will pro-  
21 ceed with other speakers.

22 If you cannot express all of your comments within ten  
23 minutes you may submit further comments in writing. Any written  
24 statements submitted here will be included in total in the  
25 transcript, and will be considered on the same basis as the

oral comments.

If you merely want to introduce your testimony in writing this evening, you may feel free to do that. You may also submit written comments until March 11, 1985, and these also will be included in the hearing record and considered fully.

Written comments should be addressed to the District Manager, Bureau of Land Management, Phoenix District Office, 2015 West Deer Valley Road, Phoenix, Arizona 85027.

The Federal Land Policy and Management Act of 1976 (FLPMA) has directed the Bureau of Land Management to conduct a wilderness study review of certain public land. The wilderness study areas under consideration here tonight were identified by the BLM under the criteria set forth in Section 2(c) of The Wilderness Act.

FLPMA has directed BLM to review such areas and prepare a recommendation as to whether the land was suitable or not suitable for designation as wilderness. The law requires that a public hearing be held as part of the study process. That is what brings us here this evening.

The BLM has completed the first part of this wilderness study, and has published a Draft Environmental Impact Statement containing his preliminary findings.

This will be your opportunity to comment on the matter. The testimony on this hearing record closes March 11, 1985.

the Phoenix District Office.

Now I'm going to call upon Roger Taylor of the Bureau of Land Management to explain the Wilderness Study Process up to this point. But first I would like to explain again that this is not an adversary proceeding. If you want to ask a question to clarify a certain point, please feel free to do so. Direct your question to me, and I will determine if it is pertinent.

If you have factual questions that you would like to ask, feel free to contact any Bureau of Land Management representatives after the hearing and speak with them.

Roger?

MR. TAYLOR: As Mr. McClure stated, the authority for our Wilderness Study down here is the Federal Land Policy and Management Act, Section 603. That Section of the Act directs the Secretary of Interior to review all public lands for their suitability for inclusion into the wilderness system, as discussed in the Wilderness Act of 1964.

The review process that will be discussed in our study tonight started back in the Fall of 1976 where an extensive inventory was done where wilderness areas of 5,000 acres or larger were identified. Most of the work on this particular phase of the inventory was done by reference to maps, aerial photos, and by using the knowledge of the local BLM employees in a given office.

Once these areas of 5,000 acres of wilderness area of

There will be a thorough review of the testimony in this Impact Statement. Your comments will be considered by the Bureau of Land Management State Director, and he will make his recommendations to the Bureau of Land Management in Washington, D.C., who will make his recommendations to the Secretary of the Interior.

After due consideration the Secretary of Interior will transmit his recommendations to the President.

The President in turn will transmit his recommendations to the Congress. After appropriate consideration which will include hearings, the Congress will accept, reject or modify the President's proposal.

Only Congress can designate an area as wilderness, and only Congress can release a Bureau of Land Management study area from its study status.

As you can see, the Bureau of Land Management's preliminary proposal before you today will undergo a comprehensive review, and this Public Hearing today and your views are a very important part in the review process.

This evening we have with us several officials of the Bureau of Land Management. To my immediate left is Roger Taylor, the Kingman Resource Area Manager.

Bill Carter is to his left. He is the Team Leader for the Phoenix Resource Area Environmental Impact Statement.

And to my right is Rich Hanson, Wilderness Specialist in

5,000 acres or larger were identified, then there was a public comment period where the public was asked to review the Bureau's progress to that point, and to comment.

After receiving comments and adjusting BLM's findings based on a public comment, then the second phase of the inventory was conducted, whereupon a very intensive ground inventory was done. This was done in the Fall of 1979 and through 1980.

The inventory involved a crew of BLM employees which went out on the ground, and reviewed every roadless wilderness area that had been identified to verify if in fact they were roadless or not, or were poor roads.

Afterwards a very intensive inventory was completed again. And again the final findings were published. There was a comment period where the public was asked to review our findings to that point, and several public meetings were held.

Based upon the public comment, BLM then determined the final boundaries for what we term wilderness study areas. These were then checked by the State Director for the Bureau of Land Management here in Arizona, who then finally designated these areas as study areas.

The subject area that we are discussing tonight, at least here in the Kingman Resource Area, is the Mt. Wilson Area, and that area was suggested for a thorough review to the Bureau's planning system where conflicts or complementing factors were identified.

1 Based upon the findings of this planning system, then a  
2 recommendation was made as to whether or not the area should  
3 be included in the wilderness system. The finding of the  
4 planning system document was that Mr. Wilson was not suitable.

5 That's why we are here tonight. The National Environ-  
6 mental Policy Act requires that for major Federal action that  
7 EIS, that is, an Environmental Impact Statement, be written;  
8 and then we have public hearings such as this one we are having  
9 tonight, to hear from the public and to identify the impacts.

10 I believe, Mr. McClure, that fairly well summarizes the  
11 process at this point in time.

12 THE HEARING OFFICER: Thank you, Roger.

13 Mike, did anyone sign up to speak?

14 MR. KLEIMANN: So fer, no. Sir, would you like to speak?

15 A VOICE: Not that I am aware. I just came here to find  
16 out how you were acting.

17 MR. KLEIMANN: I got some books here, if you would like  
18 one.

19 THE HEARING OFFICER: Since there was no one here that  
20 has requested to speak, at this time this hearing will be  
21 recessed for 30 minutes to wait and see if any other partici-  
22 pants walk in.

23 (Whereupon the proceedings were recessed at 7:30 p.m. to  
24 8:00 p.m., at which time the following proceedings were held):

25 THE HEARING OFFICER: This hearing will now come back

1 into order. It is now 8:00 o'clock.

2 Only two people were present, and no further people  
3 arrived during the recess; and the hearing is now closed.

4 (Proceedings were then concluded.)

5 ---000---

6 C-E-R-T-I-F-I-C-A-T-E

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8  
9 I, CLAYTON W. SWARTZ, Certified Shorthand Reporter for  
10 the State of Arizona, hereby certify that I made a shorthand  
11 record of the proceedings of the foregoing cause at the time  
12 and place hereinbefore stated;

13 THAT said record is full, true, and accurate;

14 THAT the same was thereafter transcribed by myself; and

15 THAT the foregoing ten (10) typewritten pages constitute  
16 a full, true and accurate transcript of said record, all to  
17 the best of my skill and ability.

18 DATED at Kingman, Arizona, this 12th day of February,  
19 1985.

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22 CLAYTON W. SWARTZ  
23 Certified Shorthand Reporter  
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3 PUBLIC HEARING  
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9 Phoenix Draft Wilderness Environmental  
10 U.S. Department of the Interior  
11 Bureau of Land Management  
12 Phoenix, Arizona  
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17 February 7, 1985  
18 7:00 o'clock p.m.  
19 205 West Jefferson  
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25 ORIGINAL

1 PANEL  
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3 Fritz Goreham, Esq.  
4 Bill Carter  
5 Richard Hanson  
6 Deane Keller  
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Jim Vasler	16
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James A. Fitzsimons	19
Clyde Kincaid	23
Dr. Robert A. Witzeman	40
Tom Wright	44
Paul Lowe	48
Joseph Gibbs	50
Clyde Kincaid	52

1 February 7, 1985  
2 Phoenix, Arizona  
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P R O C E E D I N G S

MR. GOREHAM: The hearing will now come to order. My name is Fritz L. Goreham. I'm the Field Solicitor for the Department of the Interior. That equates down to being the Chief Attorney for the Department of the Interior for Arizona. I've been appointed by the Arizona State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior.

As you're aware, this hearing relates to the Draft Environmental Impact Statement for wilderness designations, of wilderness study areas located in the Phoenix Resource Area and in the Cerbat-Black Planning Area of the Kingman Resource Area. One WSA lies north and west of Kingman. The other five WSA's lie between the Prescott National Forest and the United States-Mexico border, in four counties; Maricopa, Yavapai, Pinal and Pima Counties.

Hopefully you have all signed the attendance sheet as you came into the room. If you haven't, please do so. If you plan to make a statement this evening we had a separate sheet for those who wish to speak. Right now we have five speakers. After those five have finished, if

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1 anybody else wishes to speak, they will be given the  
2 opportunity to do so.  
3  
4 The proceedings will be recorded by an  
5 official reporter, the husband and wife team, famous team,  
6 of Wendell and Jan Chapman. They will make a verbatim  
7 transcript of everything that's said in this hearing and  
8 the government will receive a copy. If any of you want to  
9 receive a copy then you'll have to make your arrangements  
10 with the reporter.  
11  
12 This public hearing is required by statute  
13 and is being held to obtain information relating to the  
14 EIS, the Draft EIS. The purpose of the hearing basically  
15 centers on two issues: One, are the six designated areas  
16 suitable or not for designation for wilderness. And  
17 secondly, is the Draft Environmental Impact Statement  
18 adequate.  
19  
20 Preparatory to this hearing, notices were  
21 sent to Senators Goldwater and DeConcini, the congressional  
22 delegation of Rudd, Udall, Stump, McNulty and McCain and to  
23 Governor Hebbitt and other elected officials. It's also  
24 been sent to federal and state and local governmental  
25 agencies and organizations and individuals known to be  
interested in this study. Presumably most of them will  
reply and those will be included in the record.

The nature of tonight's proceeding is not a

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1 debate, it's not a trial, and in some respects it's not a  
 2 question and answer situation. The purpose is to obtain  
 3 public comment. That is not to mean that if you don't  
 4 understand something or want to direct a specific question  
 5 to the members of the panel from the BLM, who I'll  
 6 introduce in a minute, they will try to answer them on a  
 7 clarifying basis, but it will not be a debate. And I'll --  
 8 if it reaches that stage, I reserve the right to cut it off.  
 9 Members of the panel are, to my left is  
 10 Deane Keller, the Associate District Manager for the  
 11 Phoenix District. My far right is Bill Carter. He's been  
 12 the Team Leader for the Phoenix District office on this EIS.  
 13 And next to me is Richard Hanson, Wilderness Specialist of  
 14 the Phoenix District office. I presume they can answer any  
 15 questions you want to ask or they wouldn't have been sent  
 16 here by the BLM.

17 Any questions on the way we're going to  
 18 proceed? I'm going to ask the speakers to come down and  
 19 speak from the podium, because it's going to be recorded.  
 20 That means we might want to turn -- McNeill, can we turn it  
 21 a little bit so they won't have their back necessarily to  
 22 the audience and also can be speaking to the panel.

23 Since we only have five speakers, I'm not  
 24 going to put a time limit on you, but if you start to drone  
 25 on I may raise my hand or cough or whatever, and you'll get

1 represent the Grand Canyon Chapter of the Sierra Club.  
 2 The Grand Canyon Chapter supports the BLM  
 3 recommendation to designate the Moquiavari Peak unit as  
 4 wilderness.

5 The Chapter deplores and protests the  
 6 failure to recommend the other units, White Canyon, Halls  
 7 Canyon, Picacho Mountains, Mount Wilson and Coyote  
 8 Mountains.

9 I'd like to talk a little bit tonight from  
 10 my own experience and about my own opinion. I think it  
 11 probably perils the club, but I feel better speaking about  
 12 my own personal opinions.

13 In my opinion, the BLM in Arizona has,  
 14 throughout the wilderness review process, demonstrated a  
 15 bias against wilderness.

16 By consistently misinterpreting the review  
 17 process, the BLM has usurped the types of decisions that  
 18 Congress clearly delegated to itself.

19 Guidelines concerning diversity of  
 20 ecosystems and geographic distribution were included by  
 21 Congress to insure minimum representation. These  
 22 directives have been subverted and used to throw out areas  
 23 that clearly qualified for recommendation to Congress.

24 Congress gave the BLM clear discretion to  
 25 decide in favor of a wilderness recommendation for

1 the message. As I said before, we have five speakers, and  
 2 anybody else that wants to speak certainly feel free to do  
 3 so once those five are finished. Just stand and be  
 4 identified and I'll acknowledge you and certainly allow you  
 5 to speak.

6 Presumably all of you have picked up a copy  
 7 of the statement which is available on the outside foyer  
 8 there.

9 Any questions?  
 10 Okay. The first speaker will then be Drew  
 11 Cook. Cook, excuse me, Drew Cook.

12 I must ask you, all the speakers to identify  
 13 themselves as to whether they represent a particular  
 14 organization or theirsself or whatever. Fine.

15 MR. CROOK: My name is Drew Crook and I'm  
 16 representing myself.

17 I just wanted to make a couple points, and  
 18 that is that Congress will select the wilderness areas, not  
 19 the BLM. It is Congress that will set the priorities of  
 20 the conflicting demands on the BLM areas in Arizona that  
 21 are under study. And I am going to be recommending  
 22 throwing out this entire EIS and starting over again.  
 23 Thank you.

24 MR. GORHAM: Beth Medrano.  
 25 MS. MEDRANO: My name is Beth Medrano, and I

1 qualified units, qualified but controversial units with  
 2 outstanding supplemental values.

3 Hells Canyon has been proposed for natural  
 4 area designation by the Arizona Natural Area Advisory Board.  
 5 Protection for the Picacho Peak unit is  
 6 indispensable if the desert tortoise is to survive in  
 7 Arizona.

8 The Coyote Mountains unit contains two  
 9 hundred and fifty culturally sensitive areas.

10 The Draft Wilderness EIS includes an  
 11 impressive list of supplemental values for each of the five  
 12 rejected units.

13 On the other hand, some of the reasons given  
 14 for not recommending wilderness designation for a unit are  
 15 in my opinion, flimsy at best. It might have potential  
 16 copper deposits is a good example. Without getting into a  
 17 long discussion of the exploitation of this State by the  
 18 copper industry and the current market value of copper 'd  
 19 just like to point out that I feel that too much weight has  
 20 been assigned to these potential copper deposits.

21 In the Hells Canyon unit, in-holdings of  
 22 State and private land have been used as an excuse to bar  
 23 recommending to Congress this unique and fully qualified  
 24 area within easy driving range of the Phoenix Metropolitan  
 25 Area. The State Land Department has in the past cooperated

1 in land exchanges, and I feel certain that they will do so  
2 again. The Federal Government's ownership of the mineral  
3 rights to the private land in this instance, makes a land  
4 exchange quite plausible.

5 In particular, I'd like to call to your  
6 attention the opportunity to protect the riparian community  
7 in the White Canyon unit. It's an opportunity that may  
8 never come again. It's a grave concern to me that you're  
9 passing up this opportunity, because I've been involved in  
10 this BLM process for about four or five years. During that  
11 time I've watched the riparian areas here in Arizona  
12 disappear one by one. And that this opportunity to protect  
13 this riparian community would be passed over by the BLM, I  
14 think is a great shame. It's an example of the kinds of  
15 decisions that have been made in the past that will call  
16 the entire process, I think, into the courts.

17 An example that I would like to cite of  
18 the -- what to me is the growing bias of the EIS, instead  
19 of coming out of this State, is the inclusion of a chart  
20 that shows the wilderness land currently in Arizona that is  
21 forest service land and managed by governmental agencies  
22 other than the BLM. It also brings in the adjoining states  
23 such as Nevada and Colorado. I think that the inclusion of  
24 this chart -- the conclusion that I draw from the inclusion  
25 of this chart is that the BLM is pointing out that we don't

11

1 multiple use or under wilderness, they've worked very hard  
2 in the last number of years to try and protect those  
3 protected species. And whether it goes into wilderness of  
4 multiple use here again, is a lack of law enforcement in  
5 those areas due to the protection. You have two law  
6 enforcement officers that had an addition in the last year  
7 that we were working with the gentlemen, but here again,  
8 you've got a tremendous amount of area and you got some  
9 unique situations there, and the main thing, if we get good  
10 management under these multiple use or the wilderness, then  
11 we can provide protection. Thank you.

12 MR. GORESIAM: Thank you, Mr. Countryman.

13 Jack Pursley.

14 MR. PURSLEY: I am Jack Pursley, Director of  
15 Public Affairs, Geologists, for the Arizona Mining  
16 Association. The association consists of 15 major mining  
17 companies who produce most of the copper, moly, silver and  
18 gold in the state.

19 I'm commenting here today because the  
20 association is extremely concerned about the continuing  
21 actions of the Federal Government to remove and restrict  
22 public lands from productive use. Approximately two-thirds  
23 of all public lands in the United States are now  
24 effectively withdrawn from mineral development.

25 In Arizona, existing wilderness areas total

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1 need any additional wilderness areas.

2 I think that just the opposite is true, that  
3 I don't really -- I think that more to the point, I would  
4 like to see included graphs and charts that show the  
5 uniqueness of the land that the BLM in Arizona has. And as  
6 an example of that, I would say the diversity of some of  
7 the plant communities up around Kingman that include Mohave  
8 and Sonoran desert and plant growth that is not found  
9 anywhere else.

10 How many unique things like that, that are  
11 only found in Arizona, have already been taken out of the  
12 process at this point and are no longer being considered  
13 for wilderness? I think that the charts and graphs on the  
14 current wilderness over in California really have nothing  
15 to do with this process. Thank you.

16 MR. GORESIAM: Thank you very much.

17 The next requested speaker is R. A.  
18 Countryman.

19 MR. COUNTRYMAN: I'm Richard Countryman, a  
20 with the Arizona Commission of Agriculture and  
21 Horticulture. I'm the western Region Director. I'm in  
22 charge of the native plant law program.

23 I just wanted to say that we've been working  
24 very cooperatively with the BLM as far as protection of our  
25 native plants on BLM land, and we have either under

1 2,800,000 acres and it has been determined that approximately 30 million  
2 additional acres (two-thirds of the Federal lands in Arizona) are unavail-  
3 able or highly restricted to mineral resource development by other  
4 withdrawals including BLM Wilderness Study Areas, Game Preserves and  
5 Refuges, Parks and Monuments, Defense Department withdrawals and numerous  
6 other withdrawals. Each of these categories has been forced by individual  
7 withdrawal actions with little or no consideration to the cumulative  
8 effect of all withdrawals on the minerals industry in Arizona and on the  
9 National Mineral Policy which encourages the search for and development of  
10 minerals critical to our national welfare. The association feels that  
11 this cumulative effect must be addressed and considered in this EIS.

12  
13 Aside from this significant oversight, the preparers of the  
14 Phoenix BLM District draft wilderness environmental impact statement are  
15 to be complimented for an objective and professional product. The concepts  
16 discussed on pages 74 and 75, including the inability to quantify the loss  
17 of subsurface resources by wilderness designation with the recognition that  
18 changes in technology cause previously unknown resources to be capable of

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1 discovery and production, are concepts which the mining  
2 industry has stressed for years. It is gratifying to see  
3 the recognition and understanding of these concepts by the  
4 BLM in this statement.

5 The Arizona Mining Association supports the  
6 proposed action to recommend for wilderness designation the  
7 Baboquivari Peak Wilderness Study Area. Although the  
8 Baboquivari -- I hope that's right -- area has been rated  
9 as moderatel avorable for the occurrence of metallic  
10 minerals, the relatively small size of the area compared  
11 with the size of the other wilderness study areas discussed  
12 in this statement have greater mineral potential, and allow  
13 the association to support the proposed action as a  
14 reasonable compromise.

15 The enhanced wilderness alternative would  
16 cause all of the Mount Wilson and Coyote Mountain  
17 Wilderness Study Areas to be recommended for wilderness.  
18 The eastern half of Mount Wilson Wilderness Study Area and  
19 the northern three-quarters of the Coyote Mountain  
20 Wilderness Study Area are rated from highly favorable to  
21 moderately favorable for metallic and non-metallic mineral  
22 resources.

23 We agree with the geology, energy and  
24 minerals assessments establishing those ratings. The draft  
25 statement finds that these two areas possess only nominal

1 withdrawals upon the minerals industry in Arizona and upon  
2 the U.S. mineral policies currently in effect. The Arizona  
3 Mining Association is eager to provide that assistance to  
4 the BLM in this endeavor. Thank you.

5 MR. GOREHAM: Thank you very much.  
6 Mr. Fursley.

7 Scott Burge.

8 MR. BURGE: My name is Scott Burge. I'm the  
9 Conservation Chairman of the Maricopa Audubon Society.

10 Well, it's an interesting impact statement.  
11 You people outdid the Bureau of Reclamation. I thought  
12 that they could only produce something like this.

13 If I had to say anything about the impact  
14 statement, it would be to just reiterate what the  
15 gentleman, the last speaker had said.

16 It's amazing that a Federal agency that's in  
17 charge of land can produce a document which the miners like  
18 so completely. That gives me an indication of what this  
19 document is worth. I mean, a document should hurt  
20 everybody, and yet I find one user group already in  
21 complete agreement. I think that probably sums up what the  
22 document is. The document is slanted and I wouldn't go as  
23 far as what Mr. Cook, the first speaker said this evening,  
24 but I feel from the Audubon's point -- Audubon Society's  
25 point of view, that this document right now as written is

1 wilderness characteristic. Therefore, if any further  
2 consideration will be given to the enhanced wilderness  
3 alternative, the mineralization potential considered with  
4 the nominal wilderness values should cause those  
5 mineralized portions of Mount Wilson and Coyote Mountain  
6 Wilderness Study Areas to be excluded from any  
7 recommendation for wilderness designation.

8 Finally, we believe that a statement on Page  
9 90 should be corrected. On that page, the statement is  
10 made that, quote, "It is probably that only the designation  
11 of White Canyon as wilderness would potentially result in  
12 large scale adverse impacts on mineral resources."  
13 However, other parts of the Draft EIS, Pages 39 through 45,  
14 identify portions of Mount Wilson, Hells Canyon, Picacho  
15 Mountains and Coyote Mountains Wilderness Study Areas as  
16 having from moderate to high mineral potential.

17 Therefore, the conclusion on Page 90 should  
18 be revised to reflect the favorable mineral potentials in  
19 those other wilderness study areas which would be adversely  
20 impacted, in addition to the White Canyon area.

21 The Arizona Mining Association will submit  
22 more detailed comments prior to the March comment  
23 deadline. At this time, we feel that the proposed action  
24 is a good compromise. We believe, however, that the EIS  
25 should more fully reflect the cumulative impact of all

Response  
HT 3

Response  
HT 4

Response  
HT 4

1 unacceptable. Thank you very much.

2 MR. GUREHAM: That completes the original  
3 five who obviously came here to speak. There's -- I count  
4 approximately 35 people in attendance and we've had five  
5 speakers. Anybody else desire to speak?

6 You got an additional list? Just a moment.  
7 Okay. Thank you.

8 Jim Vaaler.

9 MR. VAALER: Yeah, my name is Jim Vaaler.

10 Just got a few comments about the EIS.

11 First of all, in recommending only  
12 Baboquivari Peak there is a -- I've heard there's a  
13 possibility that that could become a state park. So the  
14 Bureau of Land Management in the Phoenix District could  
15 find themselves, in my opinion, find themselves in the  
16 dubious distinction of recommending zero acreage wilderness  
17 on the Phoenix District. That don't sit well with me at  
18 all.

19 I visited all but two of the areas on your  
20 list here of recommended areas. The only two I haven't  
21 been to is Mount Wilson and the Coyote Mountains. In my  
22 opinion, they're all qualified for wilderness.

23 I've been to Hells Canyon and climbed  
24 Garfias Peak through Hells Canyon, no problem. It's a fine  
25 wilderness area. Been to White Canyon. I can't see why



1 the copper industry couldn't compromise a little bit there.  
2 such a small unit. It's really in my mind, not a conflict.

3 Newman Peak in the Piacacho Mountains, the  
4 last time I drove by there I saw some sort of tower on the  
5 summit. I don't know how that arrived there. But I didn't  
6 have any way in that thing going up there or not going up  
7 there. I was kind of disappointed to see that up there.  
8 And I've climbed Baboquivari three times. Of course,  
9 that's qualified. But you seem to have overlooked some  
10 areas that I think on the Phoenix District are qualified  
11 for wilderness.

12 In your original wilderness review you  
13 published some maps a number of years ago. Area 2-86 in  
14 the Hieroglyphic Mountains. I was there, thought it was an  
15 excellent unit. Consists of AD Mah, the Buckskin  
16 Mountains and Mincon Basin. Hiked throughout that area, a  
17 real fine area. You may have to do some land exchanges  
18 with some non-Federal land there, but it has been done in  
19 the past. I can't see it to be a problem in the future.

20 Areas 2-84 are two areas that are now  
21 adjacent to the Castle Creek wilderness area on forest  
22 service land in the Prescott National Forest. I think  
23 they'd make fine additions to the Castle Creek wilderness  
24 area. And there seems to be a good precedent for that in  
25 the BLM.

1 Hells Canyon, as well, offers excellent  
2 opportunities for solitude and contains many deep and  
3 winding rugged canyons for the challenges of rock climbing  
4 and strenuous hiking. And because of its proximity to  
5 Phoenix, being only 25 miles away, the wilderness  
6 designation would provide an easily accessible recreation  
7 area for Phoenixians who enjoy unrestrained recreation.

8 The Piacacho Mountains are steep, dramatic,  
9 granite mountains with jagged spires and sheer rock faces.  
10 Besides the opportunities for solitude, these mountains  
11 provide challenging backcountry hiking with awesome scenery  
12 and panoramic vistas from the top of Newman Peak.

13 None of the arguments given for not  
14 recommending these areas, such as infrequently used jeep  
15 trails, visibility of roads from some of the high vistas,  
16 or slight mineral potential, warrant dropping the areas  
17 from wilderness consideration.

18 It would be tragic to pass up the  
19 opportunity to preserve these unique lands as wilderness  
20 for the enjoyment of future generations of both mankind and  
21 wildlife. Thank you very much.

22 MR. GORENAM: Thank you.

23 James R. Fitzsimmons.

24 MR. FITZSIMMONS: My name is James R.  
25 Fitzsimmons, and I reside in Tempe. Do you want my exact

1 I notice in the Yuma wilderness  
2 recommendations, you state that if the Kofs (Phonetic) area  
3 becomes wilderness, one of your areas will also become  
4 wilderness along with that. I think these, this Area 2-84,  
5 would be a fine addition to the Castle Creek area.

6 I guess that's all I got to say. Thank you.

7 MR. GORENAM: Thank you very much.

8 Bobbie Holaday.

9 MS. HOLADAY: Members of BLM my name is  
10 Bobbie Holaday. I'm a member of the Sierra Club, but I'm  
11 really speaking on behalf of myself.

12 I would like to speak in support of all six  
13 areas, described in the Phoenix draft environmental  
14 statement of December 1984 being recommended for the  
15 wilderness designation. While I, myself had not visited  
16 the areas, I have seen pictures and heard reports from  
17 those who have.

18 I'm particularly interested in three of  
19 these areas.

20 Mount Wilson has a thriving population of  
21 bighorn sheep. Its rugged topographic features offer  
22 excellent opportunities for solitude for hikers who enjoy  
23 roughing it in a virtually untouched series of ridges and  
24 valleys. And the prominent high point, Wilson Ridge,  
25 offers scenic views of the Grand Canyon and Lake Mead.

1 address? 417 East Cornell Drive, Tempe.

2 Greetings to all of you. I'm an active

3 sporting member of various organizations that seek to  
4 preserve to life, not just human life, but also that of  
5 plants and animals too.

6 Humans are not the only part of the picture  
7 on Mother Earth, and we, my wife and I, are concerned about  
8 the abusive role man plays on Earth. Man must have more  
9 respect for the land in which we live. All life is  
10 intricately interwoven with each other and is --  
11 that's why I speak tonight.

12 I speak on behalf of the rich and diverse of  
13 life which is found in the work study of -- wilderness  
14 study area of White Canyon. We express our thanks to the  
15 officials who thoroughly investigated the resources of  
16 White Canyon. We too, appreciate the rich life in the  
17 riparian zones that are found there, the lush vegetation  
18 therein and the deep pools and waterfalls as described on  
19 Page 26 of the environmental impact statement.

20 We find the rock coloration, the formations  
21 different from those in other areas we've explored, which  
22 are being protected as wilderness. It seems the areas of  
23 this kind of rock formation have most been turned into  
24 mining copper pits. So, preserving this one small unit is  
25 unique in this area before, rather than after mining.

1 Another concern of ours is the whole  
2 ecosystem preserve. I'd like to think this compact unit  
3 would be an important contributor towards this. I prefer  
4 to have some of the springs further north in the abutting  
5 forest land, included in the proposed wilderness. But now  
6 let us concern with the BLM proposal.

7 Within the Phoenix wilderness environmental  
8 statement, Page 10, there is a reference to the restricted  
9 solitude and primitive recreational opportunities. The  
10 size of this unit is above the legal minimum size for  
11 wilderness units, and in our opinion, contains deep enough  
12 canyons to offer a solitude of wilderness quality.

13 In fact, on Page 26 of the environmental  
14 impact statement, mentions the precipitous cliffs and  
15 narrow, deep canyons. When at the bottom of another deep  
16 canyon, the Grand Canyon, one can never have total  
17 solitude. Even in the Grand Canyon, one can look up and  
18 see an airliner at twenty thousand feet. So, apparently we  
19 are not talking about -- we are talking about degrees of  
20 solitude; are we not? In our view, White Canyon, for its  
21 size offers enough solitude for wilderness status.

22 The negative reference to White Canyon made  
23 on Page 13 of the Environmental Impact Statement saying, it  
24 is not considered manageable as a wilderness under any  
25 alternative because of expected impacts of mineral

1 blanketing the rock faces, indicated the low air  
2 pollution. We thank the evaluators for appreciating this  
3 unit as we do and describing on Page 50, as having riparian  
4 habitat which is critical for many species and is the  
5 rarest but most productive habitat in Arizona. That  
6 description is what we consider the most important for  
7 preservation in wilderness. We support White Canyon for  
8 wilderness.

9 Alvo, first time I ever saw mud and turtle.  
10 They're all over the place.

11 MR. GOREHAM: Thank you very much.  
12 Clyde Kincaid.

13 MR. KINCAID: Hello, Mr. Goreham.  
14 MR. GOREHAM: How are you doing?  
15 MR. KINCAID: Pretty good. We haven't seen  
16 each other in awhile. Hello, Bill and Rich and Mr. Sellar,  
17 I don't think we've had the opportunity to meet. How do  
18 you do.

19 For the record and maybe for the audience,  
20 because I think it might be important, I worked for BLM in  
21 the Phoenix District for five and-a-half years. I started  
22 there as the Planning Coordinator in 1976, I believe. The  
23 same year that FLMA, the Federal Land Policy and  
24 Management Act became the governing authority for the  
25 Bureau.

1 development on the wilderness values. Copper and silver  
2 have seemed to be the minerals mentioned most often, note  
3 Page 40. Yet we remain quite skeptical at any mining of  
4 these minerals in this area will be done when existing  
5 silver mines elsewhere in the state cannot open because of  
6 economics and because copper companies like Phelps Dodge  
7 have low profits and their future is dim. Why it was  
8 reported in the news only this morning that Phelps Dodge  
9 lost two hundred and eighty million in 1984. The  
10 question is not whether copper mining will be done in White  
11 Canyon. The question is, even continue to exist in the  
12 mines today.

13 As we lead toward our conclusion here with  
14 you today, we agree that this area is small enough and  
15 perhaps it is most proper to limit the number of visitors,  
16 once it is designated wilderness. We agree that the  
17 Superstition wilderness, the only other wilderness in Pinal  
18 County is overused in the fragile riparian communities deep  
19 within White Canyon, would suffer too, from overuse.

20 We learn from our mistakes in the past.  
21 Unlimited use in this area would ease the pressures on the  
22 vegetation and wildlife dependent on the minimally  
23 distributed walked surfaces, as described on Page 69.

24 We appreciate the many beautiful moments in  
25 the unit, Gila monsters, raptors, songbirds, lichen solidly

1 At the inception of the wilderness program  
2 in late 1978, I was lucky enough to have the opportunity to  
3 become the District Wilderness Inventory Coordinator or the  
4 District Wilderness Coordinator. That was a unique  
5 position which I followed through for three and-a-half  
6 years before resigning from the Bureau.

7 I'm particularly grateful for that  
8 opportunity because it gave me the chance to perhaps be one  
9 of the individuals, if not in the state, perhaps even in  
10 the world who's most familiar with the Phoenix District.  
11 And what I mean by that, is most of Western Arizona.

12 I spent hundreds of dollars in a helicopter  
13 and airplane as well as many, many hundreds more on the  
14 ground in virtually every wilderness inventory in the  
15 District, every inventory area. And therefore, I bring a  
16 dubious distinction to this forum here tonight, in that I  
17 probably have great personal familiarity with what's at  
18 stake and what's at hand here.

19 In addition to that, I think I also have a  
20 very well rounded perception of what the Bureau's mission  
21 is under FLMA and perhaps to some extent, what a  
22 travesty -- a decision such as suggested by the proposed  
23 action of this environmental impact statement would be.

24 I'd like to sort of direct my comments in a  
25 rambling way towards the BLM generally, and towards the six

1 inventory units that it discusses, because I have not had  
2 the opportunity or the time to sit here and really prepare  
3 written comments, so if you'll bear with me.

4 First of all, I'd like to offer my  
5 congratulations to Rich. I think he did a real excellent  
6 job on Chapters 2 and 3 and he should be commended. I  
7 thought that it was a very fair, honest and well rounded  
8 discussion of the wilderness attributes and values of each  
9 of the six units.

10 There were some major deficiencies, which I  
11 will try and recall and bring to everyone's attention. And  
12 I think that in your final that those deficiencies should  
13 probably be addressed.

14 The end result of the impact statement,  
15 which is to recommend two thousand acres of BLM lands out  
16 of fifty-four thousand acres of designated wilderness study  
17 areas, seems to be something at the very least, suspect.

18 The area that is comprised of the Black  
19 Canyon, Middle Gila, Silver Bell and Black Mountains  
20 resource areas -- excuse me, Management Framework  
21 Areas, is probably at my best guess, somewhere in the  
22 neighborhood of five hundred thousand acres of BLM lands.

23 Due to the unfortunate circumstance of a  
24 Watt droppings, as they're referred to, that there was some  
25 split estate in perhaps some of the most significant units

1 each of the areas as I know them one by one, and address  
2 some of the problems that I find in the EIS and in your  
3 final recommendation.

4 One of the areas that I'm perhaps most  
5 concerned about, simply because of the total lack of  
6 support in the EIS for the proposed action, is the Coyote  
7 Mountains. They're a small granitic range, about 35 miles  
8 south and west of Tucson. They're one of the most scenic  
9 extraordinary mountain ranges in Southern Arizona.

10 Although they're fairly small, in this case  
11 only five thousand acres is managed by BLM, they harbor  
12 some of the most diverse wildlife habitat in such a small  
13 area in the state.

14 And your EIS goes on to discuss that at  
15 great lengths, and honestly and fairly. If I might quote:  
16 "This wilderness study area supports more species of big  
17 game than any other study area in the Phoenix District.  
18 Mule deer at the lower elevations, whitetail deer over most  
19 of the study area, javelina over the whole study area, and  
20 mountain lion in the more rugged portions. There is the  
21 largest portion of oak woodland habitat in this particular  
22 wilderness study area of any in the state."

23 In addition you go on to say -- and pardon  
24 me once again for my lack of preparation. "The Coyote  
25 Mountains has long been recognized for the outstanding

1 in the district and the Black Mountains.

2 We were now looking at only fifty-four  
3 thousand acres instead of approximately some two hundred  
4 and fifty thousand or two hundred acres rather, that would  
5 have been reviewed had those areas not been dropped. That  
6 means that less than 10 percent of the BLM lands being  
7 managed in these areas were under wilderness for you. That  
8 two thousand acres probably represents, therefore,  
9 something in the neighborhood of two-tenths or four-tenths  
10 of one percent.

11 If, in fact, there's some agenda here to  
12 achieve a wilderness recommendation with the least possible  
13 constraint on the Bureau's future management of lands, you  
14 have indeed affected it here with this proposal.

15 I would suggest that rather all six areas,  
16 unequivocally met the prior conditions of the Wilderness  
17 Act as it was carried out in the wilderness inventory.  
18 They are all wilderness study areas. They have all been  
19 granted that status of thereby have undeniably met  
20 standards qualifying them as having either outstanding  
21 opportunities for primitive recreation or solitude and  
22 other possible attributes. Therefore, the designation of  
23 some of those areas as being somehow less than that, is  
24 particularly onerous.

25 Nonetheless, I will go ahead and discuss

1 quality and diversity of its primitive recreational  
2 opportunities due to the assemblage of Wilderness, scenic,  
3 geologic and botanical values. Hiking clubs, boy scout  
4 troops, hunters, rock climbers, photographers and artists  
5 are known to visit the area, particularly in the winter.  
6 The cliffs, dry waterfalls, steep canyons, plant-lined  
7 washes and exfoliating granite domes attract and challenge  
8 the primitive recreationist.

9 "Day hiking opportunities are superb, with  
10 steep and precarious climbs up narrow gorges and dry  
11 waterfalls. Artists and photographers also frequent the  
12 area to capture its scenery. Geologic, plant and animal  
13 sightseeing is excellent. Sightseeing is particularly  
14 enhanced by opportunities to view deer and perhaps bighorn  
15 sheep and mountain lion."

16 And yet, you go on to say, "The wilderness  
17 quality of the unit's recreational opportunities is  
18 somewhat limited, however, by its small size." Yet, this  
19 area is two and-a-half times the size of the only area that  
20 you are recommending, Babquivari Peak.

21 I'll let the record stand.  
22 I can say unequivocally from my own personal  
23 experience, as the wilderness inventory coordinator for the  
24 BLM District, Phoenix, that as described here in your EIS,  
25 the Coyote Mountains are a superlative potential wilderness

1 area. And I question whether or not you are meeting your  
2 mandate under the Federal Land Policy and Management Act by  
3 ignoring the obvious.

4 In addition, I think history bears us out.  
5 I happen to feel somewhat vindicated coming here today,  
6 after five years, and rereading some of the information on  
7 these units to know that although my name has been impugned  
8 by some for having done what I think is a very credible  
9 inventory in the BLM in the Phoenix District, one with a  
10 lot of integrity, to find out and remember that the Coyote  
11 Mountains were recommended in 1976 and the Silver Bell  
12 Management Framework Plan as a backcountry area. The  
13 Coyote Mountains were recommended in 1976, long before  
14 anyone was thinking of wilderness inventory and you,  
15 because FILMA had not been passed as a backcountry  
16 designation. Therefore, it's nice to know that it wasn't a  
17 figment of my imagination when the inventory crew went down  
18 there and came back feeling such the same as previous BLM  
19 members had felt.

20 Likewise, I think that it's a further  
21 vindication to recall that both Baboquivari and the Picacho  
22 Mountains were recommended in the Silver Bell MFP for  
23 proposed primitive designation, which is equivalent to  
24 BLM's later wilderness authority.

25 It was only because White Canyon was so

1 BLM and forest service lands, that you may not only not be  
2 too small, but it may also not be affected by the outside  
3 sights and sounds nearly as drastically as portended in the  
4 EIS.

5 Let me say however, that the values in White  
6 Canyon are extraordinary. And the particular vindication  
7 that I find in recollecting what happened when we  
8 inventoried White Canyon was the effect brought -- this  
9 effect of announcing to the public, White Canyon as a  
10 proposed wilderness study area, brought hell and damnation  
11 from the copper industry onto the heads of the Bureau. And  
12 it put me in the odd position of having to really seriously  
13 defend a Bureau of Recommendation before a new set of  
14 managers, because at that time our state director had  
15 recently left, a man that I had a lot of faith in and I  
16 believe a person that had a lot of faith in me. We had a  
17 series of acting individuals, and finally, Mr. Tom Allen  
18 came on as an Associate State Director, and he felt that it  
19 was incumbent upon him to test the validity of the  
20 Wilderness inventory team's field work. So, he made a  
21 point of going out one weekend with another gentleman from  
22 BLM, who I can't really recall right now who it was, to see  
23 just how bad we were doing.

24 I was rather delighted when Tom came back  
25 and saw all of the mining scars, all of the outside sounds

1 obscure and hidden, that probably the Middle Gila  
2 Management Framework Plan never addressed the values in  
3 that particular unit and it was during the wilderness  
4 inventory that we discovered White Canyon. So I'd like to  
5 move on and discuss White Canyon momentarily.

6 It is an area, which I will say from the  
7 outset that I personally, and this may come as a shock to  
8 some people, might have trouble in thinking about a  
9 wilderness designation for it. Nonetheless, the way it is  
10 presented here in this document is inaccurate.

11 First of all, one of the major  
12 considerations that went into the inventoring of that unit  
13 when it was done, was the fact that it was adjacent to  
14 forest service land. I see absolutely no mention of that  
15 in this EIS. There is at least eight to ten thousand acres  
16 of roadless forest service land adjacent to the White  
17 Canyon unit. What the implications of that are, I do not  
18 know, but this EIS does not address that, and it should.  
19 Because part of the problem, part of the argument that is  
20 used to eliminate White Canyon as a potential wilderness  
21 candidate is the fact that it is, Number One, too small,  
22 and Number Two, that it is seriously affected by outside  
23 sights and sounds.

24 Now, if in fact, the potential roadless area  
25 that might be designated wilderness were to include both

1 presently referred to in this EIS. And came back  
2 astonished at the beauty, at the confinement, at the  
3 wilderness potential of White Canyon and said, "Yes, you're  
4 right Clyde, it has to stay in."

5 One of the things that's amazing about the  
6 wildness of White Canyon, is it's the only place that I  
7 know of, of BLM land in the Phoenix District that has black  
8 bear in it, and yet, of course, there's no mention of that  
9 in the EIS. We found scat in a cave in White Canyon,  
10 brought it back and showed it to the wildlife biologist,  
11 and sure enough, it was black bear. It speaks something  
12 about the total wildness of this particular area.

13 Another very small and unmentioned fact, but  
14 nonetheless I think interesting, because of what it says of  
15 the area in terms of its uniqueness and its attributes is,  
16 I believe, we discovered the world's largest pinon tree at  
17 White Canyon. It's approximately eleven feet in  
18 circumference. It stands approximately fifty-five-foot  
19 high and is about sixty-five feet from side to side. It's  
20 in a little side canyon that's fed by springs. It's for  
21 reasons such as these that Tom Allen went out and saw White  
22 Canyon and came back and said, in effect, that the  
23 wilderness inventory team had not done a bad job.

24 I think that perhaps you need to reconsider  
25 White Canyon. At the very least there should be some

1 mention of alternative potential management. The Middle  
2 Gila Management Framework Plan is not current. It is  
3 outdated. It has no recognition of this particular area.  
4 It has no proposed management for the area. There is  
5 nothing for the public to hang its concerns on. I think  
6 there's a very serious deficiency here.

7 I don't know what the possible alternative  
8 management scheme might be, whether it's an area of  
9 critical environmental concern, or whether in fact, it  
10 might and should be wilderness, once one looked at the  
11 potential forest service lands that are adjacent to the  
12 unit. Nonetheless, the EIS is deficient.

13 I'm somewhat amused by Mount Wilson and the  
14 fact that it's found to have outstanding opportunities for  
15 solitude and not an outstanding opportunity for primitive  
16 and unconfined recreation. I think someone ought to ask a  
17 member of our wilderness inventory team who worked on that  
18 unit, what they think about the potential for primitive and  
19 unconfined recreation.

20 Sadly and unfortunately, but nonetheless I  
21 think interesting, a member of our inventory team took a  
22 very serious fall on that unit. It was a woman. She was  
23 cut by herself. She hurt herself quite badly. She was  
24 lost in that state for a number of hours and was only  
25 rescued by a helicopter that had to fly in from Kingman to

1 at the adjacent National Park Service proposed wilderness,  
2 consider the effect of looking at one large contiguous  
3 expanse of desert bajada on the Park Service lands, the  
4 flat country, and in this instance, BLM's having the rocky,  
5 rugged, remote, mountainous country, and looking at their  
6 common integrity and considering what the real wilderness  
7 potential is.

8 And then, I think that BLM ought to consider  
9 the very important aspect of the critical bighorn sheep  
10 habitat or what might be the largest expanding heard of  
11 desert bighorn in the United States.

12 It seems, especially in light of the fact  
13 that of all of the rest of the blacks being dropped because  
14 of split estate, that this is the one unique opportunity  
15 that BLM has to assure that a portion of that bighorn sheep  
16 habitat is in perpetuity managed for that wilderness  
17 species. And I don't think that anywhere in this EIS that  
18 kind of relationship is given satisfactory discussion.

19 Hells Canyon is also amusing. Because Rich,  
20 as my protege confessed to me privately on a number of  
21 occasions early on in his career with BLM that Hells Canyon  
22 was probably one of his favorite areas. It's also good to  
23 know and remember that it was proposed in the Black Canyon  
24 NFP, Management Framework Plan, as a portion of the  
25 Buckhorn scenic area.

1 find her and take her out.

2 I would guess that Mount Wilson is one of  
3 the wilder and the more rugged units in all of the Phoenix  
4 District. It is extremely isolated. Many of the units are  
5 referred to as being near to towns, cities, highways,  
6 roads, while this unit happens to be near a state highway.  
7 It is, in its center because it is a relatively large unit,  
8 and adjacent to National Park Service lands, extremely  
9 remote and rugged.

10 Another one of the deficiencies with your  
11 assessment of Mount Wilson is the fact that it is adjacent  
12 to National Park Service lands that are indeed proposed and  
13 administratively endorsed for wilderness. And there is no  
14 mention of this in the EIS.

15 One of the concerns often stated by  
16 conservationists, and certainly one of the arguments used  
17 frequently enough by BLM and others, is that units are too  
18 small to really get the wilderness experience. Here is a  
19 unit of about twenty-nine thousand acres in size, adjacent  
20 to a park service proposal of about forty thousand acres in  
21 size, the opportunity for a seventy thousand-acre  
22 wilderness area in essence, and all of a sudden we have  
23 forgotten the argument that big wilderness is good  
24 wilderness.

25 I suggest that the Bureau go back and look

Response  
HT 5

1 I get a particular delight in naming these  
2 things because I remember how difficult a struggle it was  
3 to do the wilderness inventory in the Phoenix District.  
4 And to know, as I said earlier, that previous professionals  
5 working for BLM had found a number of these self-same areas  
6 that contain special values.

7 I'll have to say out front again, that I  
8 disagreed with Rich four or five years ago. Hells Canyon  
9 and Garris Mountain was an area that I had some doubts  
10 about in the wilderness inventory, because of many of the  
11 problems that you yourselves have outlined here in this  
12 EIS. I don't know what the final best management might be  
13 for that area. I do recognize a number of the problems.

14 In going on to Picoacho Mountains, I think  
15 the interesting and exciting thing about the Picoachos is  
16 just the opposite of what you've stated here folks so  
17 frequently in this document.

18 MR. GOREHAM: Mr. Kincaid, you've now, using  
19 your terms, been rambling whether you know it or not, over  
20 25 minutes. And you're obviously very enlightened with the  
21 subject so, if you could speed it up, because there's other  
22 people that might want to speak.

23 MR. KINCAID: Okay.  
24 Am I holding anyone up?  
25 MR. GOREHAM: All right. Fine.

1 MR. KINCAID: The Picocho Mountains, I think  
2 what makes the situation so amusing and exciting and  
3 interesting is that one of the very reasons -- I actually  
4 sat and talked to the kids, the guys who did the wilderness  
5 inventory in that unit. And I pointed to it, and I said,  
6 "You know, that area is going to become designated  
7 wilderness." And ironies of ironies, it was because here  
8 it stood next to a major freeway, five miles off the road,  
9 in open view to everyone as an extraordinary monolith that  
10 there were no conflicts with, of note, and it was exactly  
11 the sort of thing that sometimes we see get designated and  
12 I just had in the back of my mind, wouldn't that be  
13 something. Wouldn't that be amazing indeed, if the  
14 Picocho Mountains got designated wilderness. Well, the  
15 truth of the matter is, it could, and it should, and it  
16 ought to be.

17 The specious arguments that are cited in  
18 this document are principally references to outside sights  
19 and sounds. I think it would require a fair discussion, if  
20 in fact, that's what the Bureau wanted to hang its hat on.

21 Push Ridge is only a few miles down the  
22 road. The Saguaro National Monument is just across town.  
23 The Superstitions rise just above Apache Junction. In all  
24 of those instances, outside sights and sounds are far more  
25 extreme than they are at Picochos.

1 mountain. Unless you're one of the top mountain climbers  
2 in the country and the vast majority of us are not so  
3 skilled. And that is up Thompson Canyon along the south  
4 and east, which then finds its way along the north slope  
5 and around to the northwest side and up an old rock trail.  
6 It's very precarious and very difficult. And along that  
7 north side in this forest full of little orchids and ferns  
8 is basically the only place that you can walk. It is very  
9 susceptible to erosion and overuse.

10 And I think this brings up one of the  
11 problems, some of the myopia in the Bureau's understanding  
12 of wilderness and wilderness designation and wilderness  
13 management. It's so often considered a sop for  
14 recreationists. Something that we throw out to keep a  
15 certain segment of the community somehow quiet.

16 Baboquivari lies in the face of that  
17 interpretation of wilderness and the Wilderness Act.  
18 Baboquivari is special. Baboquivari is delicate.  
19 Baboquivari is extraordinary. And while it should be  
20 designated wilderness, it should be managed not for its  
21 recreational values, but it should be managed for its  
22 specialness and its uniqueness.

23 And it will require, in my estimation, some  
24 kind of very keen special limited use management. And I  
25 think that the Bureau ought to recognize that. In so

1 And once again, to cite vindication, the  
2 Silver Bell Management Framework Plan in 1976 recommended  
3 this as a primitive area. Our inventory crew found the  
4 same values in 1980 that were found by previous BLM  
5 professionals.

6 Getting on to the last area, the area that I  
7 might have one of the greatest quarrels with in this  
8 document is Baboquivari Peak. Baboquivari is so  
9 extraordinary, it's very difficult to even try and describe  
10 the feeling and the emotion that one gets on top of that  
11 mountain. It's rightly a sacred place to some people in  
12 this world. I think it should be designated wilderness.

13 I hear there's an attempt afoot to block up  
14 some State lands, possibly private lands adjacent to the  
15 unit to make it larger and, therefore, more tolerable as a  
16 wilderness unit. I think that's an admirable proposal with  
17 a single proviso. And that is, that Baboquivari, and  
18 especially the ridge, the land around the rock itself,  
19 because it rises as a rock like Gibraltar out of nowhere,  
20 is among the most fragile, delicate land of any in the  
21 Phoenix District.

22 There is an oak forest there with walnuts,  
23 mahogany, maple. And there is essentially only one trail  
24 to the top of Baboquivari, in spite of what's stated in  
25 this document. There really is only one access to that

1 doing, they are recognizing that recreation is not  
2 necessarily the first principal of wilderness and  
3 wilderness management. And I believe that once the Bureau  
4 begins to recognize that, they will then also see that  
5 wilderness is really something very different from what it  
6 is touted as being in the very limited bureaucratic  
7 fashion.

8 It has the effect of protecting unique and  
9 special wildlife values, water shed, threatening endangered  
10 species, cultural resources. And none of those necessarily  
11 imply a recreational use. And as such, it becomes a much  
12 broader management tool available to the hands of managers  
13 in the Bureau and I would hope -- I would hope that  
14 sometime in the future, perhaps in a less politicized era  
15 that we see that there is an opportunity here to manage  
16 those very resources in a broad basis and in perpetuity for  
17 the American public without considering that very narrow,  
18 as I call it, sop to conservationists and recreationists,  
19 because it really is something else. It's something much  
20 more. Thank you.

21 MR. GOREHAM: Thank you, Mr. Kincaid for  
22 your remarks. We're appreciative of your involvement and  
23 your beliefs and understanding as to the process.

24 The next speaker is Bob Witsenan.

25 MR. WITENMAN: My name is Bob Witsenan.

1 I've been a practicing physician here in the Valley since  
2 1956.

3 I'd like to express my feeling that more  
4 wilderness areas should have been included in the Phoenix  
5 District BLM, and I wish it had been more than that one.  
6 Especially the riparian areas such as the White Canyon  
7 area is a scarce as diamond situation. These areas are  
8 few and far between in the state, and they are ever more  
9 dwindling as these areas are valuable for other reasons.  
10 That makes White Canyon more important to preserve.

11 Most of our Sonoran Desert rivers are  
12 disappearing and anytime we have broadleaf vegetation along  
13 a Sonoran Desert area, it is of great value to wildlife,  
14 whether it's black hawk, song-tailed hawks, coopers hawks.  
15 It represents something that people from all over the  
16 United States interestingly enough, come out to visit BLM  
17 lands to see those species, such as Burro Creek, which  
18 isn't in the Phoenix District area. But these lands are  
19 really unique and I wish you had given more consideration  
20 to the White Canyon area for that reason.

21 I'd like to comment on roadlessness. I  
22 think that it is very important that roadless areas be set  
23 aside for future generations to enjoy them. If an area  
24 does have a road in it, I also don't think that it should  
25 be precluded as the previous speaker also mentioned. And I

1 is -- look at overgrazing in riparian areas. It's a real  
2 problem from BLM lands. There probably would be very  
3 little grazing on BLM lands, they're so arid. If it  
4 weren't for the fact that your animal unit months are a  
5 dollar and a few pennies, when the free enterprise fee  
6 that -- if you were to rent that land if you were a rancher  
7 for private enterprise, you'd pay many more times that.

8 So, this constituency of people that come to  
9 you, at least I understand the mining business, I mean the  
10 grazing and it doesn't make any sense. What I see is  
11 you're allowing grazing to continue in these fragile areas  
12 like White Canyon at the expense of people who grow cattle  
13 in Iowa. And we feel that it's not fair to them and it's  
14 not fair to the market system that people should pay a fair  
15 market price to graze in White Canyon or in other areas.

16 Wilderness is one way to somewhat limit this  
17 abuse of riparian areas and other areas because, at least  
18 mechanically they can't drive their trucks in there and  
19 dynamite water holes and develop wells underneath the  
20 ground. And so, it does allow somewhat of the market  
21 system's return in a few areas and preserve these few  
22 remaining areas for, what I think is, people in this room  
23 who would like to be able to enjoy those areas in a less  
24 abused state. Thank you for this opportunity.

25 MR. GOREHAM: Thank you, Dr. Wiseman.

1 think that there comes a time when we have to limit the  
2 amount of development of these areas from a constituency,  
3 the mining and grazing interest that apparently has a  
4 remarkable amount of political clout.

5 I don't see them and I don't hear them here  
6 tonight, and I wonder how they get to you first. I look at  
7 myself as a hobbyist who enjoys our public lands, and I  
8 wonder if they think they own the public lands and why  
9 aren't they here represented. At all of the wilderness  
10 hearings that I've been to since 1958, they weren't  
11 wilderness hearings, they were BLM, they were forest  
12 service hearings. There was never the exploiting people  
13 that came to the hearings. I don't know if they don't like  
14 to come out from their homes in the evening and they do  
15 their lobbying during the day with their Congressman and  
16 their Congressman put the screws on you.

17 We don't make our livelihood at this, and  
18 maybe if we don't make our livelihood, we don't count as  
19 much in your eyes. But, we work hard all day long to be  
20 able to enjoy the lands that you are the caretakers,  
21 custodians, for all Americans. And we pray that you will  
22 continue to set them aside.

23 And what worries me, is I don't believe they  
24 are being set aside rationally. And I don't necessarily  
25 mean everything has to be wilderness, but what ties in

1 Anybody else wish to speak?

2 MR. WRIGHT: My name is Tom Wright, and I  
3 live in Scottsdale, and I have a statement on behalf of the  
4 Arizona Wilderness Coalition.

5 The EIS document is very thorough and easy  
6 to understand. But it is also very self-contradictory and  
7 heavily biased against wilderness.

8 With only one out of six areas recommended  
9 for wilderness, it's hard to see how the recommendations  
10 could have been any smaller. It's important to remember  
11 too, that hundreds of thousands of acres have already been  
12 dropped by former Interior Secretary James Watt, areas we  
13 aren't even addressing in this EIS.

14 According to the EIS there are very few  
15 significant conflicts with wilderness, and all of these  
16 areas have glowing descriptions that ought to lead to a  
17 recommendation as wilderness. It's difficult to imagine  
18 how any of the non-wilderness recommendations could have  
19 been made by the BLM after reading their own document.

20 Ironically, implementing the preferred  
21 alternative in the EIS means less protection for these  
22 areas than if the BLM was not doing a wilderness review at  
23 all. The existing land use plans protect five out of six  
24 of the areas in various ways. The all wilderness  
25 alternative would actually come the closest to continuing

1 the protective management the BLM was doing prior to the  
2 wilderness program.

3 The Picacho Mountains unit illustrates many  
4 of the problems with these recommendations. Page 37 of the  
5 EIS suggests that this area being close to the cities of  
6 Phoenix and Tucson is an advantage for recreationists in  
7 those cities. But, the BLM is recommending against  
8 wilderness here in part because the area is too close to  
9 Elroy.

10 This makes no sense at all, especially when  
11 Congress has already designated wilderness at Pusch Ridge  
12 next to the Tucson area, and the Superstitions directly  
13 above Apache Junction. Even the State of Arizona has  
14 recognized the contribution the Picacho Mountains make by  
15 designating the Picacho Mountain State Park, across the  
16 freeway from the BLM area.

17 Another reason cited to drop Picacho, was  
18 the prospect of future developments such as the Central  
19 Arizona Project Canal. Ironically, intrusions along a  
20 powerline and a communication station have already been  
21 allowed inside the Picacho area, because they were judged  
22 not to detract from the wilderness. That is obviously a  
23 double standard that results in no wilderness, either way  
24 you cut it.

25 Allowing a telecommunications site inside

1 thousand some acres. It's a very topographically prominent  
2 point. In fact, it's the highest and most rugged point in  
3 the whole country around Hoover Dam.

4 It's an extremely scenic and rugged area.  
5 It's important bighorn sheep habitat. The sheep migrate  
6 back and forth between the BLM and Park Service land.  
7 There are no real conflicts or problems in this area.

8 I remember the statement mentioned an access  
9 problem. That it would become overcrowded by users  
10 concentrating in the valleys, down at the base of the  
11 ridge. That's ridiculous.

12 If anybody is going to go in that area,  
13 they're going to follow the ridge tops, these very narrow  
14 spiny ridge tops up to the peak. And it's not the sort of  
15 area that is going to draw a very heavy recreation use  
16 anyway, because it is rugged and dry, and there are no  
17 trails there. And I don't think that that's a valid  
18 conflict.

19 The White Canyon area close to Phoenix is a  
20 special favorite of mine. I had heard great things about  
21 it for quite awhile. I finally sent there myself to check  
22 it out, and found it to be a really splendid area and very  
23 unusual. It offers excellent opportunities for day hikes  
24 as well as short backpacks. It has rare and valuable  
25 riparian habitat, unusual plants and animals.

1 this WGA clearly biases against a wilderness  
2 recommendation. It's probably a violation of the interim  
3 management policy, because such facilities are to be  
4 temporary and reclaimable. The EIS says that the  
5 facilities will be removed if Congress designates Picacho a  
6 wilderness. But, that's too late, because these intrusions  
7 are to be removed by the time the Secretary of the Interior  
8 sends a recommendation to the President.

9 In summary, the BLM's small recommendations  
10 greatly polarized the situation. These areas currently  
11 enjoy much more protection now than if the BLM's paltry  
12 wilderness recommendations were followed.

13 We strongly urge the BLM to change its  
14 recommendations, to be more in line with its own  
15 assessments of the wilderness values in these areas. The  
16 recommendations certainly lack credibility now, and there  
17 is little reason to pursue a BLM wilderness bill in  
18 Congress with the BLM recommendations so stacked against  
19 reasonable protection for these outstanding areas.

20 I'd like to add a couple of personal  
21 comments now about areas that I'm familiar with.

22 Mount Wilson area, which is adjacent to Taha  
23 Head Recreation area. It's adjacent to proposed wilderness  
24 within the recreation area. I was really astonished that  
25 the BLM did not recommend it. It's a large area, twenty

1 The only problem with this area, as I  
2 recall, was the potential for copper production. And given  
3 the state of the copper industry in Arizona, and the way  
4 it's been going for the last ten years or so, I can't  
5 really believe that the so-called moderate potential of  
6 this area for copper production presents any real threat to  
7 the copper industry.

8 On the other hand, if it were to be  
9 developed for copper, it would certainly destroy some very  
10 unique and outstanding wilderness values. And I think the  
11 area is more important for those values than for the  
12 possibility that maybe some day, somebody might make a  
13 little money digging a big hole in the ground.

14 That's the conclusion of my statements,  
15 thank you.

16 MR. GORENAM: Thank you very much. Any  
17 other persons which to speak? Yes, m'am. Sir, sorry.  
18 MR. LOWES: One of them.

19 My name is Paul Lowes. I'm from Scottsdale,  
20 and I've been involved in wilderness activities in Arizona  
21 for a long time. And I have to say I'm pretty unhappy  
22 about this whole process, once again. I think the BLM's  
23 got a historic bias against wilderness. I'm not sure why  
24 that is. So much of Western Arizona would be easy to  
25 manage. And in fact, it pretty much is wilderness right



1 now and ought to continue that way. With an little  
2 conflicts, I think that more of these areas, and  
3 additionally later more of the areas that were excluded  
4 ought to be managed as wildernesses.

5 I'm concerned about the BLM's bias in  
6 regards to mining. It seems to me like the Arizona Mining  
7 Association says, we got a favorable or even moderate  
8 mineral potential on these lands.

9 I've looked for years at AMA maps and  
10 ratings of mineral potential in Arizona. Favorable means,  
11 there might be something out there in reality and moderate  
12 means, if you found a penny on the land, that's all the  
13 copper in the area for miles around.

14 These distinctions should be completely  
15 ignored, unless the Arizona Mining Association can show  
16 some more specific potentials in those lands than -- the  
17 comments, I think, should basically be ignored from the  
18 AMA, just being new speak.

19 I would like to talk specifically about  
20 Mount Wilson. I've never been far into the heart of the  
21 area. It's a real rugged, real wild area. There are very  
22 little conflicts. For the BLM to say it has limited  
23 wilderness resources is, to me, incomprehensible. It's a  
24 very rugged, wild country, and I think, it could only be  
25 managed as such to any value to anybody.

1 hyped up from the fast pace they live in. Where are they  
2 going to go to get completely away from everything that is  
3 surrounding them?

4 Not only now, but in the future, you have to  
5 think of people that need a release from everything of the  
6 hand of man. And I think two thousand acres, in the  
7 direction that we're going, it seems like the burden of  
8 proof would be two thousand acres out of an initial two  
9 hundred thousand acres. Two thousand is about the size of,  
10 you know, two or three golf courses. And I think that we  
11 can all do better than that. Thank you.

12 MR. GOREHAM: Thank you.

13 Anybody else wish to speak?

14 Before I close the hearing, that will  
15 conclude the oral presentations, but the record remains  
16 open until March 11th. And anybody that wants to provide  
17 written comments, they will be included in the record.  
18 Those written comments should be addressed to the District  
19 Manager, Bureau of Land Management, the Phoenix District  
20 office, and the address is 2015 West Deer Valley Road,  
21 Phoenix, Arizona 85027.

22 In closing, kind of elaborating on  
23 Mr. Crook's opening statements that the BLM will not pick  
24 the wilderness areas, that Congress will, that's basically  
25 correct. This is at the beginning, the BLM under PLMA has

1 The last thing I would like to say is, I  
2 think Baboquivari is basically a bone being thrown to  
3 people who understood in using Arizona's wild lands for  
4 pleasure, and for education, and recreation. Baboquivari  
5 is a very beautiful place and definitely deserves a  
6 wilderness distinction, but it's hard to take that  
7 seriously. As a single wilderness recommendation on all  
8 these wonderful lands.

9 MR. GOREHAM: Thank you very much.

10 MR. GIBBS: My name is Joseph Gibbs, from  
11 Tempe. I really didn't plan on speaking tonight. I was  
12 just going to sit in. I wasn't prepared for the meeting at  
13 all. I didn't even hear about it.

14 But, I think you, as a Board, really are the  
15 only buffer that the American people have between the  
16 monied interests that see land as a way to turn a buck and  
17 the people that can see land probably as that,  
18 realistically, and also, something on the level of  
19 spiritual values. Something that doesn't -- the hand of  
20 man has not touched, because you don't see anything related  
21 to the hand of man. There's a lot of spiritual values in  
22 that.

23 And I feel that wilderness areas are a  
24 buffer and will be a pressure release valve for years to  
25 come for all the people in the city, for people that are so

1 the direction to try to identify these areas.

2 Your comments will be considered by the BLM  
3 state director in his recommendations to the BLM director,  
4 who must then make his recommendation to the Secretary of  
5 the Interior, who then goes on to the President, the  
6 President to Congress and Congress will ultimately make  
7 that decision. And they will also probably include  
8 hearings so, the actual designation of the areas is awhile  
9 away. But your comments have certainly been welcome, and  
10 you're encouraged to submit written comments.

11 I don't know if I want to call on you or  
12 not, Clyde. Go ahead.

13 MR. KINCAID: For instance, can I just make  
14 one very brief statement to be entered into the record?

15 MR. GOREHAM: Yes.

16 MR. KINCAID: After you're through.

17 MR. GOREHAM: No, you're fine. Go ahead.

18 MR. KINCAID: Okay. I just wanted to site  
19 for the record, what I thought was the single most  
20 important statement in the EIS, something that I underlined.

21 And that is this: The Mount Wilson, Pinalco  
22 Mountains, Coyote Mountains and Baboquivari Peak Wilderness  
23 Study Areas, are considered manageable as wilderness under  
24 any alternative. There are no current or anticipated land  
25 uses within these wilderness study areas considered

1 Detrimental to the long-term manageability of the areas as  
2 wilderness.

3 I think that is true. I think it is  
4 accurate. And I think it should be the pivotal and guiding  
5 point of the entire EIS. And I would hope that you could  
6 go back and review what you've written and come to the same  
7 conclusion as I did. Thank you.

8 MR. GOREMAN: The Bureau of Land Management  
9 thanks you for your participation tonight. I was  
10 interested in the comments and I'm sure the panel members  
11 were also.

12 The panel members, after I formally close  
13 this will be available for one-on-one discussions that you  
14 might have, which may aid in your written comments, if you  
15 so choose. I don't see any other speakers, I'll close the  
16 hearing. Thank you very much.

17 (The hearing was concluded at 8:30 p.m.)  
18  
19  
20  
21  
22  
23  
24  
25

1 STATE OF ARIZONA )  
2 ) ss.  
3 COUNTY OF MARICOPA )

4 I, WENDELL CHAPMAN, a Notary Public in and  
5 for the County of Maricopa, State of Arizona, do hereby  
6 certify that the foregoing 53 pages constitute a full, true  
7 and accurate transcript of the proceedings had in the  
8 foregoing matter, all done to the best of my skill and  
9 ability.

10 I FURTHER CERTIFY that I am in no way related  
11 to any of the parties hereto nor am I in any way interested  
12 in the outcome hereof.

13 DATED at Phoenix, Arizona, this 07 day of  
14 February, 1987.

15 *Wendell Chapman*  
16 \_\_\_\_\_  
17 Notary Public

18 My Commission Expires  
19 March 7, 1987  
20  
21  
22  
23  
24  
25

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United States  
Department of  
Agriculture

Forest  
Service

Chino Valley Ranger District P.O. Box 485  
Chino Valley, AZ 86323

Jan, 2, 1985

Re: 1950

Date: January 2, 1985

Marlyn V. Jones,  
District Manager, Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Mr. Marlyn,

I am very pleased to see that Baboquivari Mountain is being recommended as wilderness under the "proposed action" alternative.

However, I am very disappointed to see the Coyote Mountains placed on your list of WSA's opened to development. The Coyote Mountains have many of the same wilderness qualities that are found in the Baboquivari area. In fact, they are part of the same range and biological community. If the Coyote Mountains are developed, it will decrease the scenic value and solitude of Baboquivari. Both should be protected!

The Coyote Mountains offer excellent opportunities for rockclimbing and hiking. They consist of innumerable faces, crags, and steep canyons. It is quite easy to become isolated by walking or climbing among these features.

Please reconsider your proposed action for the Coyote Mountains. Thank you.

Daniel McCool  
729 San Saba  
College Station, TX  
77840

District Manager, BLM  
Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, Arizona 85027

Dear Sirs:

I have reviewed your Phoenix Draft Wilderness Environmental Impact Statement dated December 1984. Overall, I find the draft statement to be sufficient in meeting the intent of the National Environmental Policy Act. The only suggestion I would make is that the attached map be modified to include the new wildernesses of the recently passed Arizona Wilderness Bill. This would improve the general public's ability to visualize the location of areas currently existing as wilderness areas in Arizona.

Thank you for the opportunity to comment.

Sincerely,

  
EMILIO S. LUJAN  
District Ranger

BLM PHOENIX DISTRICT

JAN 4 '85

- \_\_\_\_ DM
  - \_\_\_\_ ADM
  - \_\_\_\_ PA
  - \_\_\_\_ ADMR
  - \_\_\_\_ OPS
  - \_\_\_\_ M&S
  - \_\_\_\_ RES
  - \_\_\_\_ P&A
  - \_\_\_\_ L&RA
  - \_\_\_\_ WMA
  - \_\_\_\_ CF
- Action By \_\_\_\_\_  
Date Dets \_\_\_\_\_

103



January 10, 1985

Bureau of Land Management  
 Marlyn V. Jones, District Manager  
 Phoenix District Office  
 2015 West Deer Valley Road  
 Phoenix, Arizona 85027

Subj: Phoenix Draft Wilderness Environmental Impact Statement

Gentlemen:

I realize the BLM has considerable research on this EIS, but the Proposed Action is truly disappointing and reveals an obvious anti-wilderness bias. This report acknowledges extensive wilderness values in all six WSA's reviewed, but your Proposed Action drops all but the smallest unit for minor conflicts. It was interesting to note that your Proposed Action provided much less protection than the No Action (current policy) Alternative which manages two areas for wilderness and one for backcountry uses. This Draft EIS does not demonstrate a "good faith" attempt to weigh conflicts. Wilderness designation which provides for "multiple uses" seems to have been avoided to defer to minor benefits for "special interests" and in particular the mining and communications industries. The small acreage recommended for Wilderness must not only be compared to the total acreage of these six units, but also against the much larger total BLM acreage in the Phoenix District. Competing uses already have more than adequate resources available on BLM and other public lands in the District. To afford wilderness protection to only this one small unit is not only an injustice to this generation but to all future generations of Arizonans and Americans.

The All Wilderness Alternative would protect 20 sensitive plant species, 4 special status wildlife species, 6 crucial habitats in a natural condition, and protect 6 excellent primitive recreation areas. It would also protect watershed, scenic, and culturally sensitive areas. The losses for competing uses prohibited by Wilderness designation are minimal.

- ORV conflicts are minimal. There is little ORV use in these six units now and plentiful ORV use opportunities on nearby lands.
- Grazing is allowed in wilderness areas at existing levels and these 6 units have little potential for grazing improvements. The total AUM's for all 6 WSA's are only 1763 AUM's (147 cows.)
- There is negligible energy potential in the WSA's and only one significant mineral conflict (White Canyon.) Wilderness designation of all 6 units would have a miniscule impact on Arizona's mining industry and mineral availability.

I urge that the All Wilderness Alternative be adopted as the Proposed Action in the Final Wilderness Environmental Impact Statement. You must be reminded that the All Wilderness Alternative is only protecting a small portion of BLM land in the Phoenix District and excludes prime wilderness candidates such as Ragged Top.

Following are supporting arguments for Wilderness recommendation for the four units that I am most familiar with. Acquaintances of mine assure me that equally compelling arguments for the other two units exist.

#### White Canyon - WSA 2 - 187

Perhaps of all the WSA's, White Canyon needs and deserves Wilderness designation the most. Contrary to the mediocre wilderness value description given in the Draft EIS, White Canyon has truly outstanding wilderness qualities: scenery, opportunities for solitude, wildlife, and a 3 mile stretch of perennial stream with lush riparian vegetation. The few remaining perennial streams with natural riparian vegetation in the Southwest need protection. Canyons such as White Canyon protect a quantity and diversity of wildlife far greater per acre than any other habitat type.

White Canyon is a candidate for re-introducing 3 species (1 endangered and 1 state listed.) I identified 43 species of birds on one day hike in the canyon and I am not an experienced birder. I also saw the only mountain lion I've seen in the wild in White Canyon. Bear also frequent the canyon moving in from the adjacent Tonto National Forest. I've never seen a higher density of raptor nests anywhere else. White Canyon has 21 known prehistoric cultural sites and the entire unit is considered culturally sensitive.

The Draft EIS on page 10 and 26 indicate that the opportunities for solitude and primitive recreation are restricted and limited. I disagree. For it's size it offers considerable opportunities for a high quality wilderness experience, at least 40 or more visitors at a time. Due to the topography, a higher density per acre than Arravaipa Canyon which it can be compared to except for size. With well known places like Arravaipa already with waiting lists and Arizona's booming population, it behooves us to protect the few remaining outstanding canyons such as White Canyon. Photography opportunities are also outstanding in White Canyon. Only the remote location and difficult access have kept White Canyon from heavier recreational use.

The Draft EIS (pg.13) recalls that White Canyon has moderate to high favorability for metallic mineral resource development. The mineral analysis indicates potential for four metals, but copper is the primary one. Commercially viable copper deposits are abundant in Arizona and the world, and on far less sensitive areas. Outstanding wilderness units such as White Canyon which belong to the American citizens should not be sacrificed for a little extra profits (maybe) for Kennecott Corp. and other special interests. It would be sacrificed for no benefit to the public (the owners,) the potential minerals being readily available elsewhere.

White Canyon WSA has outstanding wilderness values and deserves designation when compared with conflicting values. It is truly an outstanding wilderness area! Mineral rights on White Canyon should be purchased by the BLM.

#### Coyote Mountains - WSA 2-202

It is difficult to comprehend why you did not recommend this area for Wilderness designation. This exciting natural area with it's exfoliating granite domes reminds me of Yosemite than any other area in the Southwest. You describe wilderness qualities on page 72, "highly scenic, natural desert landscape characterized by rugged peaks, cliffs, rock faces, and dense palo verde-saguaro and interior chaparral plant cover. Such undisturbed terrain would provide outstanding opportunities for both solitude and primitive recreation." and "A wide variety of primitive recreation opportunities....including hiking, hunting, rock climbing, photography, sightseeing and viewing of plants and animals." and "Protecting wilderness values would also benefit...habitat for seven special status wildlife species...for eight protected plant species." I agree with this description of outstanding wilderness qualities - but you failed to propose it for wilderness designation! In addition wilderness designation would protect 250 culturally sensitive acres including a classic period Hohokan compound(pg.84.) Your current Silver Bell MFP recommends the entire WSA be managed to protect scenic, natural, and primitive values. On page 11, you state "...the area's relatively small size lessens the wilderness caliber of the WSA's solitude and primitive recreation opportunities." I disagree! Coyote Mountains have a mass of rugged canyons that offer an exceptional quantity of opportunities for solitude and primitive recreation for an area it's size.

There are negligible conflicts for wilderness designation for this WSA. There are only 364 AUM's (32 cows) allotted to this unit. Most of the unit is natural and ungrazed. The unit is far too rugged to afford much ORV use. Although historic mining occurred in the Bonanza Mine area, there is little evidence to support significant future potential. The old mine workings are a negligible visual impact.

To quote another EIS comment from page 32, "Coyote Mountains WSA has long been recognized for the outstanding quality and diversity of it's primitive recreational opportunities due to..." and you proceed for three paragraphs to describe values that would support

wilderness designation. I've been there several times and agree with your description. I urge you to include Coyote Mountains WSA as recommended wilderness in your Final EIS Proposed Action. I also recommend acquiring and maintaining public access to the Coyote Mountains. It has outstanding potential for primitive recreation for rapidly expanding Tucson and Southern Arizona, and has important wildlife values that need protection.

Baboquivari Peak- WSA 2-203B

I support your Proposed Action for wilderness designation of this WSA. Your analysis is complete and accurate. It identifies the broad public support for the area and it's many natural qualities, wildlife values, and primitive recreation opportunities. I also concur with your plan to acquire 3245 acres of state land east of the WSA with significant natural, scenic, and primitive values. The Nature Conservancy acquisition of the ranch adjacent to the unit and resale with strict deed restrictions will further protect the wilderness qualities of this WSA.

Picacho Mountains - WSA 2-194

I am not as familiar with this WSA as the prior three, but I am familiar enough to disagree with the first and third factors you cite on page 10 as considerations in deciding not to recommend this WSA for wilderness designation. There ARE canyons in a very natural state that allow solitude and primitive recreation opportunities, and that provide screening from the future GAP aqueduct and sights and sounds outside the unit.

Mineral potential and grazing are negligible conflicts with wilderness on this unit. Communications sites are the real conflict and I believe wilderness protection for a natural area is a far higher priority than providing music to car radios on I-10 (most have tape decks anyway) or bouncing TV stations from Phoenix to Tucson (they do have satellites now.)

A prime reason for designation of this WSA as wilderness is protection of wildlife values. Wilderness would protect 8 special status species (ref. pg.31.) and you acknowledge on page 72 that all 6400 acres are crucial desert tortoise habitat ( the highest

known state population,pg. 50.) And yet your Proposed Action (ref. pg. 10) would allow Vehicle use including ORV's- a direct conflict with protection of the desert tortoise and other wildlife. The desert bighorn sheep is also a candidate for reintroduction into the Picacho Mountains. This is too important a wildlife area to sacrifice.

When all the wilderness values and conflicts are weighed, it becomes obvious that that the Picacho Mountains also deserve and need Wilderness designation.

In summary, I urge that your All Wilderness Alternative in the Draft Wilderness EIS become the Proposed Action in the Final Wilderness EIS for the Phoenix District. While it might not satisfy a few special interests, it would best serve the owners, the American public.

Sincerely,

*Jim Notestine*

Jim Notestine

P.O. Box 461  
Sonita, Az. 85637

4

5

1858 East Brown Road  
Mesa, Arizona 85203  
January 29, 1985

ALLEN P. LOVEJOY  
3135 DESERT PALM DR. - LANE HOUSING CITY 428689

Jan. 25, 1985

BLM  
Attn: Marilyn Jones, Phoenix District Manager

Dear Friends —

This is to express my interest in the wilderness recommendations currently coming up for consideration. I believe that we should preserve as much wilderness as we can. Therefore I urge that White Canyon, Hell's Canyon, Picacho Mountains, Mt. Wilson, Coyote Mtns & Baboquivari Peak be classified for Wilderness.

We will be interested in the outcome of the hearings and your determination.

Sincerely,  
Allen P. Lovejoy

Phoenix District Office  
Bureau of Land Management  
c/o Marilyn Jones  
Phoenix, Arizona

Dear Ms. Jones,

I am writing in support of the Bureau's decision to recommend wilderness status for Baboquivari Peak.

In addition, I would like to support the inclusion of the following areas as wilderness:

Coyote Mountains. The Bureau has listed several qualities which make this area unique and failed to include it only because of its small size. I feel that this should not be a reason for exclusion.

White Canyon. The resemblance of this area to the slickrock area of Utah is somewhat unique to Arizona. In view of the present world copper glut, the possibility of this mineral being present does not seem a viable excuse for denying wilderness status.

Mt. Wilson. This area's proximity to the Lake Mead Recreational area seems an excellent reason to include it as BLM wilderness.

Hell's Canyon. Aside from the many features which make this area unique, the fact that it has been proposed for Natural Area designation by the State would seem to indicate the importance of its preservation.

Picacho Mountains. The existence of several special status wildlife species in this area gives it an unusual importance. Its proximity to the C.A.P. canal, I-10 and Eloy make it even more critical to give the area wilderness status to preserve its present character.

Because of the present and future population growth of this part of the country, it seems of utmost importance to set aside unique areas such as those mentioned above. Residents of the state twenty years from now will grateful that we did.

Sincerely,  
Robert F. Green, M.D.

6

F.O. Box 4021  
Cave Creek, AZ 85331  
Jan. 28, 1985

Phoenix District Manager  
Bureau of Land Management  
2015 West Deer Valley Rd.  
Phoenix, AZ 85027

Dear Sirs:

Please send me one copy of the Draft Wilderness Environmental Impact Statement prepared for the proposed wilderness areas under Bureau of Land Management (BLM) jurisdiction in Arizona. Thank you very much.

I also would like to go on public record concerning two of the areas under consideration which I am familiar with.

Hall's Canyon, west of Lake Pleasant, is a desert wilderness of extreme beauty. The State Natural Area Advisory Board has proposed special status to this area. The few impacts in the area should not affect its wilderness qualities. My visit to the area left me very impressed; I felt it should be a wilderness area before I knew it was being considered. I, therefore, urge the BLM to change its recommendation to that of wilderness.

Mt. Wilson, near Lake Mead, is a prime candidate for wilderness designation. It is extremely isolated. Considering its common boundaries with the Lake Mead National Recreation Area, this is an area deserving wilderness protection. I urge the BLM to change its recommendation on this area to wilderness.

Again, thank you for the publication and for accepting my comments as a portion of the public record concerning wilderness in Arizona.

Sincerely,

*Thomas J. Myers*  
Thomas J. Myers

7



STATE OF ARIZONA  
DEPARTMENT OF MINES AND MINERAL RESOURCES

Mineral Building, Fairgrounds, Phoenix, Arizona 85007 • (602) 255-3791

January 30, 1985

Mr. Marilyn V. Jones, District Manager  
BLM - Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Mr. Jones:

Thank you for the opportunity to comment on the Phoenix Draft Wilderness Environmental Impact Statement.

In general, the Department of Mines and Mineral Resources agrees with the choice of alternatives to be proposed to Congress for approval. Although we believe that more emphasis should be placed on mineral potential as a reason for returning these areas to multiple use status, we accept the reasons set forth in this draft EIS.

The proposed action that we disagree with is the one to designate the Baboquivari Peak WSA (2-203B) as wilderness. Although the mineral potential of this area is recognized, it is still proposed for wilderness status. We sympathize with the concern for the feelings of the Papago people who feel that they have a cultural and religious claim to Baboquivari Peak.

Therefore, we propose another alternative for your consideration. The primary purpose of designating the Baboquivari Peak WSA as wilderness appears to be to preserve the peak as a cultural and religious symbol for the Papago people. The best way to accomplish this is to give that portion of Section 14, T19S, R7E, S & SW4 within which Baboquivari Peak is situated to the Papago tribe as an addition to their reservation. The Tribe can then protect it as required to satisfy the religion and customs of its members without interference from the BLM. The remainder of the WSA can then be returned to multiple use status for the benefit and enjoyment of the general public.

If this alternative is impossible to implement under current regulations, it should be presented to Congress as an alternative to whatever recommendation finally made.

Sincerely,

*Richard R. Beard*  
Richard R. Beard  
Mining Engineer

RRB:ak



8

Feb 2, 1985

To: BLM

Please count this letter as a request that all appropriate BLM holdings in Arizona be designated as official Wilderness. Three areas in particular that should be converted to Wilderness status immediately are the Picacho Mountains (including Newmen Peak) the east side of Baboquivari Peak and the Coyote Mountains. The BLM has always been pro-recreation and development so I won't waste any ink explaining the many benefits and desirability of Wilderness Areas.

DJ. Pison  
4016 N Park Ave  
Tucson Az  
85719

cc: Morris Kudell

9

BLM  
Phoenix District Office  
c/o Marilyn Jones  
Phoenix District Manager  
B.L.M.  
2015 West Deer Valley Rd.,  
Phoenix, Az. 85027

February 1, 1985

Dear Ms. Jones:

I am writing to let you know of my feelings regarding the BLM wilderness recommendation for Arizona. I am very concerned about these recommendations. It seems to me that the BLM has gone out of its way to discover reasons not to recommend an area for wilderness, rather than looking hard to find reasons why an area should be recommended. If you looked, you would find ample cause to nominate all 6 of the WSAs for wilderness status, for I firmly believe that each of these units (I am an avid hiker in this state) richly deserve wilderness status.

Consider Mt. Wilson. You say this area lacks important wilderness characteristics, and opportunities "unique to this area alone". Hogwash! The solitude, the rugged, untrammelled vistas, the fact that it is surrounded on three sides by the Lake Mead area, all contribute to a marvelous wilderness experience. Exactly what do you consider wilderness? This sounds to me like a thinly-veiled attempt to remove a problem by re-defining the problem. If you want it to go away, just pretend it isn't there, if we say it isn't wilderness, then maybe it won't be. Unfortunately, since wilderness by definition is a lack of human intervention, saying an area like Mt. Wilson isn't wilderness will in all likelihood mean that it soon will not be. At least not after the soldiers of greed have a chance to conduct maneuvers there.

And how about Hell's Canyon? What a marvelous example of rugged desert wilderness: the haunting gorge, the nearby canyons, the fascinating and precious Cedar Basin, where the relic chaparral grow. Here you say, about an area close enough to Phoenix to be a convenient one-day refuge from the maddening pressures of city life, that it is not recommended for wilderness because of a moderate potential for mineral? By god, are rocks the only thing we care about mining the earth for? What about beauty, solitude, a renewed spirit, a reminder of our place in this universe, our relationship with the other creatures of the world, the ineffable thrill that courses through our bodies and our mind when we, for even an instant, sense the old, old harmonies we share with this earth? Granted, these concerns do nothing for the GRCSS national product, for this mindless obsession we have with growth and the melody of tinkling coins. But, in the long run, in a world fast becoming over-populated and uniformly paved, these values of which I speak will be worth more to us, and to our children, and their children, and their children's children, than all the vats of copper in this universe.

The same could, and must, be said for the other WSAs. We need, desperately, the Coyote Mountains, White Canyon, the Picacho Mountains, and Baboquivari Peak. What does it matter if the Coyotes are not as vast as, say, the Brooks Range in Alaska? They are a heck of a lot closer, and offer the same gems of insight and refreshment, spiritual refreshment, that the Brooks do. All we need are untrammelled vistas, an ancient silence, and the cry of a coyote, and we will have our doorstep of Phoenix, and yet, wander round the far side of Superstition Mountain, and you are 3,000 miles from that city. The spirit, and the heart, have their own ways of reckoning distance.

page 2

Waltrip

Finally, I want to urge you to declare as wilderness an area that James Watt dropped from consideration, for no other reason than that someone tugged on his string. This is the delightful Ragged Top unit. A great injustice was done when this was dropped from consideration, another way of saying that if you ignore the problem, the problem will go away. The problem, though, is that Ragged Top is too fine an area, too special a place, to sacrifice to the wolves of industry.

It was Wallace Stegner who once wrote: "Something will have gone out of us as a people if we ever let the remaining wilderness be destroyed.....We need wilderness preserved - as much of it as is still left and as many kinds - because it was the challenge against which our character as a people was formed. We simply need that wild country available to us, even if we never do more than drive to its edge and look in. For it can be a means of reassuring ourselves of our sanity as creatures, a part of the geography of hope."

For the BLM to knowingly doom these precious, irreplaceable relics of the wilderness that once shined throughout this state would be a tragedy. Our reservoir of hope will have run dry, and, as Stegner says, something will have gone out of us as a people. I cannot believe that you would want to do that for something so transitory as short-term profit. These wildlands are a vast treasure bequeathed to us by fate, and the BLM, for better or for worse, finds itself in the position of being guardian over that treasure.

I pray that the day will never come when we shall rise and look around and, seeing that our treasure was traded for a few trinkets of gold, find cause to curse that guardian.

Sincerely,

*Randy Waltrip*  
Randy Waltrip  
8601 E. Old Spanish Trail  
#129  
Tucson, Az. 85710



OFFICE OF

**ECONOMIC PLANNING AND DEVELOPMENT**

Beth S. Jarman, Ph.D., Executive Director • (602) 256-5371

MEMORANDUM

TO: Bureau of Land Management

FROM: Arizona State Clearinghouse

DATE: February 01, 1985

RE: Draft EIS for the Proposed Wilderness Program for the Phoenix Wilderness EIS Area, Maricopa, Mohave, Yavapai, Pinal & Pima Counties, AZ.  
SAL NO: AZ 84-80-0048

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 Regional Councils of Government.

The Standard Form 424 is attached along with any comments that were received for submission with the project.

## Attachments

cc: Arizona State Clearinghouse  
Applicant

## SIGNOFF

OMB Approval No. 29-10210

Date submitted: November 15/88

DEC 26 1988

84-80-004 R

Page 32 of 36

Director  
Agriculture & Horticulture Dept.  
421 Capitol Annex West  
Phoenix, AZ 85007  
DEC 24 1988Indian Affairs  
Transportation  
Hinterland Res.  
Game & Fish  
Ag. & Hort.  
Water  
Parks  
Land  
AIRCFROM: Arizona State Clearinghouse  
1702 West Washington Street, Room 505  
Phoenix, Arizona 85007Region I, II, III,  
IV, V

<b>FEDERAL ASSISTANCE</b>		2. Applicant's organization	3. Number	4. Title applicant identifier	5. Number AZ 84-80-0048
1. Type of action (Mark appropriate)		4. Date Year Month Day	6. Date Year month day	7. Date Year month day	8. Date Year month day
a. <input type="checkbox"/> Preapplication b. <input type="checkbox"/> Application c. <input type="checkbox"/> Notification Of Intent (FOI) d. <input type="checkbox"/> Report Of Federal Action		4. Date Year Month Day	6. Date Year month day	7. Date Year month day	8. Date Year month day
1. Type of action (Mark appropriate)		4. Date Year Month Day	6. Date Year month day	7. Date Year month day	8. Date Year month day
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a. <input type="checkbox"/> Preapplication b. <input type="checkbox"/> Application c. <input type="checkbox"/> Notification Of Intent (FOI) d. <input type="checkbox"/> Report Of Federal Action		4. Date Year Month Day	6. Date Year month day	7. Date Year month day	8. Date Year month day

1. Type of action (Mark appropriate)  
a.  Preapplication  
b.  Application  
c.  Notification Of Intent (FOI)  
d.  Report Of Federal Action

2. Applicant's organization  
Bureau of Land Management

3. Number  
AZ 84-80-0048

4. Date  
Year Month Day  
FEB 01 1989

5. Number  
AZ 84-80-0048

6. Date  
Year month day  
Assigned 19 DEC 26 1988

7. Date  
Year month day

8. Date  
Year month day

9. Federal Employer Identification No.

10. Program  
a. Name  
Federal/State/County  
DOI, BLM  
b. Title  
unknown

11. Estimated number of persons benefiting

12. Type of application  
a. New  
b. Renewal  
c. Extension  
d. Other  
Enter appropriate letter ( )

13. Estimated date to be submitted to federal agency

14. Congressional Districts  
a. Federal  
b. Applicant  
c. State  
d. Local  
e. Total

15. Project Start Date  
Year month day

16. Project Duration  
Months  
Year month day

17. Project Duration  
Months  
Year month day

18. Estimated date to be submitted to federal agency

19. Federal agency to receive request (Name, city, state, zip code)

20. Agency name

21. Administrative office

22. Federal grant identification

23. Action taken  
a. Assessed  
b. Rejected  
c. Returned for amendment  
d. Deferred  
e. Withdrawn

24. Funding  
a. Federal \$  
b. Applicant \$  
c. State \$  
d. Local \$  
e. Other \$  
f. Total \$

25. Action date

26. Contact for additional information (Name and telephone number)

27. Remarks added  
 Yes  No

28. Date signed  
Year month day

29. Application received  
Year month day

30. Federal grant identification

31. Reviewing date  
Year month day

32. Ending date  
Year month day

33. Remarks added  
 Yes  No

34. Federal Agency A-95 Official (Name and telephone number)

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return this FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

No comment on this project  Proposal is supported as written  Comments as indicated below

- Is project consistent with your agency goals and objectives?  Yes  No  Not Relative to this agency
- Does project contribute to statewide and/or arewide goals and objectives of which you are familiar?  Yes  No
- Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives?  Yes  No
- Will project have an adverse effect on existing programs with your agency or within project impact area?  Yes  No
- Does project violate any rules or regulations of your agency?  Yes  No
- Does project adequately address the intended effect on target animal/wildlife?  Yes  No
- Is project in accord with existing applicable laws, rules or regulations with which you are familiar?  Yes  No

Additional Comments (fill in back at sheet, if necessary).

See attached comments

Reviewers Signature

*[Signature]*  
Date 12-26-88  
255-4573

Reviewers Title

*[Signature]*  
Date 12-26-88  
255-4573



Arizona Commission of  
Agriculture and Horticulture

1688 WEST ADAMS • PHOENIX, ARIZONA 85007 • (602) 255-4373



FIELD SERVICES

State Agricultural Laboratory  
Fruit & Vegetable Standardization

District Offices  
Inspection Stations

Office of State Chemist  
Board of Pesticide Control

Baboquivari Peak

This area lying adjacent to the Papago Indian Reservation would be enhanced by the wilderness designation with the inclusion of the 2,065 acres bordering the peak on the east. This would allow the maintenance of the natural character of the area and preserve the religious use by the Papago Tribe. The limited access to the area allows outstanding solitude experiences in the area. It has been properly managed under the multiple use management plan at the present time.



Arizona Commission of  
Agriculture and Horticulture

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FIELD SERVICES

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Office of State Chemist  
Board of Pesticide Control

COTOTE MTS.

This area is used by the public extensively now, even with limited access for the various scenic, vegetative and animal values stated. Designating the wilderness status would only increase public impact on the area. The public numbers that visit the area haven't impacted the area at present under the multiple use management program and should continue under this program.



Arizona Commission of  
Agriculture and Horticulture

1688 WEST ADAMS • PHOENIX, ARIZONA 85007 • (602) 255-4373



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Agriculture and Horticulture

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FIELD SERVICES

State Agricultural Laboratory  
Fruit & Vegetable Standardization

FIELD SERVICES

District Offices  
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Office of State Chemist  
Board of Pesticide Control

State Agricultural Laboratory  
Fruit & Vegetable Standardization

District Offices  
Inspection Stations

Office of State Chemist  
Board of Pesticide Control

PREACHO MTS.

This area has little access except by foot and continued over the years in relative pristine condition because of the lack of access and the multiple use concept with proper management would continue to preserve it. In that state wilderness designation, it would only bring more public pressure on the area.

WHITE CANYON

This area visited mainly during the year by deer hunters in the Game Management Units and by a few local residents during the year. Have visited the area a number of times during deer season, and because of the very difficult access to the area, the multiple use plan is working. If grazing allotments are eliminated, the ranch in the area would lose a good water source to properly handle an economic unit. For the rancher, multiple use would best serve the area.



Arizona Commission of  
Agriculture and Horticulture

1688 WEST ADAMS • PHOENIX, ARIZONA 85007 • (602) 255-4373



FIELD SERVICES

State Agricultural Laboratory  
Fruit & Vegetable Standardization

District Offices  
Inspection Stations

Office of State Chemist  
Board of Pesticide Control

OFFICE OF THE DIRECTOR

HELLS CANYON

This area is being managed in good order by the multiple use management plan and with a few limited access to already existing roads would allow the area to be relatively unspoiled. Once the area is designated wilderness, it would have an influx of the public which would put pressures on this area and lose the characteristics of the area that make it unique.



Arizona Commission of  
Agriculture and Horticulture

1688 WEST ADAMS • PHOENIX, ARIZONA 85007 • (602) 255-4373



FIELD SERVICES

State Agricultural Laboratory  
Fruit & Vegetable Standardization

District Offices  
Inspection Stations

Office of State Chemist  
Board of Pesticide Control

OFFICE OF THE DIRECTOR

MT. WILSON

This area lying in the Northwest corner of Mohave County is little used by the general public and has only two trails into the area and see no benefit by making the area a wilderness designation. Proper multiple use management would allow protection of existing desert, bighorn sheep habitat and allow the small grazing allotment in the area. Once designated as a wilderness, more public use would occur and endanger what you now have as a fairly pristine area.

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## SIERRA CLUB

Tolyake Chapter - Nevada and Eastern California

January 30, 1985

District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones:

Thank you for sending us a copy of the Phoenix Draft Wilderness Environmental Impact Statement (DEIS). We have carefully reviewed the DEIS and have some comments on the Mt. Wilson WSA, with which we in Las Vegas have intimate familiarity.

We were surprised by your Proposed Action Alternative's elimination of wilderness for this unit. We feel this area deserves a recommendation for wilderness for several reasons. The most obvious of these is the long-term protection of crucial habitat for the desert bighorn sheep (page 78, bottom left), which the DEIS analysis describes as covering the entire WSA (page 47, bottom right). Habitat for six additional special-status species would also be protected (page 78, bottom left). Our members are especially struck by the tenuous existence of mule deer in the WSA and by the desirability of providing the full measure of protection for this species within wilderness. Under wilderness designation the water sources would provide long term protected habitat for quail and mourning doves (page 47, bottom right). The five proposed water developments seem to be capable of installation under wilderness management policy if carefully designed and installed.

We have long been impressed by the crucial position of the Wilson Ridge with respect to the Lake Mead National Recreation Area (LMNRA). The WSA is surrounded by LMNRA on the west, north and east (page 22, left) and directly abuts agency endorsed wilderness (1979) within LMNRA on its north and northwest boundaries.

Wilson Ridge is the highest and, in some ways, the most commanding feature of the area. It is difficult, therefore, to ignore when considering its impact on the visual resource associated with LMNRA. Logically, Wilson Ridge should be included within LMNRA and, if we remember right, such a proposal was once considered. Had that happened, Wilson Ridge would likely have been part of the abutting wilderness proposals.

The Ridge has a commanding presence on the east side of US 93 which complements the dramatic scenery of the Lake Mojave breaks to the west. Mineral development or other visual disturbances on Wilson Ridge would surely denigrate the scenic values of the Lake Mojave topographic environment and should be avoided. Wilderness designation would provide long term protection for this visual resource, which would be upgraded to VFM Class 1. The straight boundaries separating LMNRA wilderness proposals and the WSA make posting and identification on the ground difficult. Wilderness classification for the WSA would, in a practical sense, remove this problem. A Wilson Ridge wilderness in combination with the LMNRA wilderness proposals would provide an outstandingly large wilderness of excellent configuration. A Mt. Wilson wilderness would also permit consideration for wilderness of the narrow strip within LMNRA which lies between the WSA's southwestern boundary and US 93.

The DEIS downgrades the WSA in opportunities for primitive and unconfined recreation by attesting to a concentration of use in valleys and basins formed between side ridges (page 22, bottom right). In our experience, most hiking occurs on the ridges, the valleys being mostly routes of access to the ridgelines where the scenery is most dramatic. The Las Vegas Group of the Sierra Club has climbed Mt. Wilson from both the east and west and also along the ridge from the vicinity of Fortification Hill in LMNRA. The pleasure of extensive views into the Lake Mojave - Lake Mead foreground and distant vistas into Nevada and Arizona has repeatedly brought hikers back to these mountains, both as individuals and groups. A special feature not mentioned in the DEIS is the granite found in this portion of the Black Mountains which provides an enjoyable change from the more somber tones of black lava frequently encountered in the LMNRA region.

Mineral development opportunities within the WSA do not appear to be very good and from the DEIS analysis would be poor in the western two thirds of the area. There are no expected occurrences of strategic or critical minerals (page 39 left). Development of the small area of sodium leases in the extreme eastern portion would not appear to impact wilderness to a high degree and may be only a negligible portion of a larger area outside the WSA. Sand and gravel are common commodities with widespread occurrence in areas closer to their market. Development of these should be avoided along the scenic US 93 corridor in any case. The moderate favorability for uranium is, as with all GEM Reports, quite speculative. Indeed, it seems that where there is any uncertainty over a proposal for or

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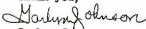
February 3, 1985

Bureau of Land Management  
 Marlyn V. Jones, District Manager  
 Phoenix District Office  
 2015 West Deer Valley Road  
 Phoenix, Arizona 85027

Gentlemen:

I was recently informed that three of my favorite areas had been dropped from recommendation for Wilderness designation. Coyote Mountains, White Canyon, and the Picacho Mountains. These areas all have very important wildlife and plantlife values that need permanent protection. They are excellent areas for hiking, birding, and photography. Mining, other development, and ORV's should be prohibited from these areas and Wilderness designation would best protect them. I am also concerned about Ragged Top which was supposedly dropped by James Watt. It has outstanding Wilderness qualities like the other three areas I mentioned and it should be protected. I thought it was over 8000 acres - why was it dropped?

I urge you to recommend Ragged Top, White Canyon, Picacho Mountains, and Coyote Mountains for wilderness designation.

Thank you,  
  
 Marlyn Johnson  
 3313 N. Bentley Ave.  
 Tucson, Az. 85716

against wilderness on mineral grounds, a decision should tilt towards wilderness at this stage of the process, if only to obtain the improved data from USGS and Bureau of Mines studies that would follow. The final decision would then have the benefit of this improved information.

The lack of conflict with other land uses is noteworthy for the Mt. Wilson WSA (page 51 left), and the DEIS discusses the absence of manageability problems that would result from ORV entry (page 57, bottom right). The single grazing allotment, classified as ephemeral, has only 4% of its area within the WSA. It appears that little or no impact on rangeland use or development would result from wilderness classification (page 84, bottom right). Cultural resources would be best protected under wilderness because of reduction in entry by vehicles as well as prohibition on surface disturbance.

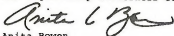
In summary, wilderness seems highly desirable for all 24,821 acres of the Mt. Wilson WSA. Long-term wildlife habitat protection would be assured. Designation would be most compatible with LMNRA management and would recognize the WSA's sensitive relationship to the LMNRA. Mineral conflicts do not appear significant and better mineral data will result from studies that would follow a decision for wilderness at this stage of the process. Other conflicts do not appear significant.

We appreciate the opportunity you have given us to comment on a wilderness decision for this area in which we have such direct interest.

Sincerely,



Howard Booth  
 Las Vegas Group Wilderness Coordinator



Anita Bowen  
 Las Vegas Group Conservation Chairperson



13

5102 East Citrus Street  
Tucson, Arizona 85712  
February 4, 1985

District Manager, Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Sir:

We would like to comment on the EIS for the  
WSAs in the Phoenix Resource Area.

White Canyon should be wilderness, even though it is  
6,968 acres - these tough canyon and meesa would provide  
a good wilderness experience. Potential for copper isn't that high.

Hill's Canyon should certainly be wilderness - it has been  
proposed for National Area designation by the State Natural Area  
Advisory Board. It has crucial area for Gilbert's Shrike, and a  
very unique area where saguanos and junipers grow.

Picacho Mountains - should be wilderness, even though only  
648 acres because it has eight special status wildlife species  
and is crucial desert tortoise habitat.

Mount Wilson - should be wilderness. Solitude would  
be great because of the surrounding Recreation Area and possi-  
ble wilderness designation for contiguous lands. Also is crucial  
big-horn habitat.

Coyote Mountains - should be wilderness. The undisturbed  
terrain provides ample solitude. It has seven special status wildlife  
species and eight protected plants. There are native grasses on the  
Crest.

Babquivari Peak - should be wilderness - it's a  
landmark in southern Arizona - there's no reason it shouldn't be  
wilderness.

These six areas definitely should be pro-  
tected as wilderness areas. The Ragged Top unit should be  
reinstated and made wilderness, also. It certainly qualifies.

Sincerely,  
Walter + Dorothy Pelach

14

2503 E. Imperial  
Mesa, Az. 85209  
Feb. 2, 1985

Phoenix District Manager, B.L.M.,  
2015 West Deer Valley Rd.  
Phoenix, Az. 85027

Dear Marilyn Jones:

I am very concerned about the  
wilderness areas in Az. This  
state, needless to say, is growing and  
our wilderness needs to be cared  
for. Future generations need to be  
guaranteed the beauty we have today.

I'm furious with the  
fact that the BLM has chosen only one  
area to preserve, i.e., Babquivari and  
strongly recommend that you include  
White Canyon, Hill's Canyon, Picacho  
Mountains, Mt. Wilson, and Coyote  
Mountains.

Sincerely,  
Mrs. May Howell

February 2, 1985

Bureau of Land Management  
 Marlyn V. Jones, District Manager  
 Phoenix District Office  
 20 15 West Deer Valley Road  
 Phoenix, Arizona 85027

Subj: Phoenix Draft Wilderness Environmental Impact Statement  
 Ref: January 30, 1985 Public Hearing at the Tucson Hilton Inn

I ran out of time presenting the Sierra Club Rincon Group position statement. In addition to presenting supporting arguments for White Canyon, Coyote Mountains, Baboquivari Peak, and the Picacho Mountains; I was to present the argument for reinstating Ragged Top which was dropped by the infamous James Watt. Ragged Top is an 8,000 acre unit, all of which qualifies for wilderness. The BLM made an improper decision to reduce the unit to 4460 acres knowing this would probably disqualify it for wilderness. It's size was reduced for minor ways and tailings. This is the kind of criteria for which the USFS had to redo their wilderness evaluations (RARE II). Ragged Top 2-197 has some of the finest Sonoran Desert remaining. It is very scenic (Silverbell Mine is only visible from the top) and offers excellent opportunities for solitude and primitive recreation. It has a very diverse spectrum of desert flora and fauna.

To afford wilderness protection to only Baboquivari Peak would not only be an injustice to this generation, but to all future generations of Arizonans and Americans. The demand for wilderness is rapidly growing in Arizona while proposals such as yours are rapidly trying to shrink it. You are recommending to give our heritage away forever. Wilderness designation should not be avoided because of inholding and access problems. There are many other reasons for wilderness designation than recreation, such as wildlife, plantlife, watershed, genetic pools, etc.

In summary we request that you recommend your All Wilderness proposal plus Ragged Top for your proposed action in your Final EIS.

In addition we request that you include the enclosed petition with 95 signatures (95 friends of these units from around the country) in the written record.

*Jim Hotestine*  
 Jim Hotestine

Representing the Rincon Group of the Sierra Club

P.O. Box 461  
 Sonoita, Az. 85637

15-1

118

15-1

Ragged Top has been reinstated as a WSA. The WSA will be analyzed in the forthcoming wilderness EIS. This EIS will analyze those WSAs dropped because of split-estate or size limitation.

To: Bureau of Land Management, Phoenix District Office

We, the undersigned, urge the Bureau of Land Management to include the following seven WSA's as "recommended for wilderness" in the Proposed Action of the Phoenix Final Wilderness Impact Statement when released: Coyote Mountains WSA 2-202, White Canyon WSA 2-197, Baboquivari Peak WSA 2-203B, Picacho Mountains WSA 2-19a, Hells Canyon WSA 2-119, Mount Wilson WSA 2-01a, and Ragged Top WSA 2-197. All seven WSA's have outstanding opportunities for solitude and primitive recreation. In addition wilderness designation would protect at least 20 sensitive plant species, 4 special-status wild-life species, 6 crucial habitats in a natural condition; as well as watershed, scenic, and culturally sensitive areas. Wilderness designation would provide the maximum multiple use values in the above seven WSA's.

	NAME	ADDRESS
1	<u>Frank M. King</u>	<u>1460 Fort Apache Rd. Phoenix, AZ 85008</u>
2	<u>Barbara A. King</u>	<u>" " " " " "</u>
3	<u>Gertrude A. Hochberg</u>	<u>3926 N. Roman Rd. Tucson AZ 85705</u>
4	<u>Charles M. M. Cortina</u>	<u>5831 Beasdale Ct. Avondale Va 22005</u>
5	<u>Charlotte Legras</u>	<u>205 West End Ave. N.J. 10023</u>
6	<u>Barbara Legras</u>	<u>205 West End Ave. N.J. 10023</u>
7	<u>John A. Tuckman</u>	<u>Rt 1 to Dulid, Ill 61080</u>
8	<u>Harold H. Schroder</u>	<u>615 W. Alhambra 303 Tucson</u>
9	<u>Tom Schellberg</u>	<u>210 Madison Ave. Schuylkill, Pa 16125</u>
10	<u>William M. Peck</u>	<u>1439 Bevan Dr. Dulles Va 22028</u>
11	<u>James E. Peck</u>	<u>1439 Bevan Dr. Dulles Va 22028</u>
12	<u>John Thayer Gould</u>	<u>3516 W. Stewart, Phoenix, AZ 85018</u>
13	<u>William Levine</u>	<u>300th 55th NY NY 10019</u>
14	<u>William S. Bony</u>	<u>Long Beach, Ca 90801</u>
15	<u>Don Montford</u>	<u>232 E. University, Tucson AZ 85705</u>
16	<u>Alfred Boyko</u>	<u>112 Hillcrest Christian, M.L. 41210</u>
17	<u>M. Paul White</u>	<u>1601 New Hampshire Dr. Tucson, AZ 85710</u>
18	<u>Olevis Lee Yopp</u>	<u>3035 N. Jackson, Tucson, AZ 85719</u>

To: Bureau of Land Management, Phoenix District Office

We, the undersigned, urge the Bureau of Land Management to include the following seven WSA's as "recommended for wilderness" in the Proposed Action of the Phoenix Final Wilderness Impact Statement when released: Coyote Mountains WSA 2-202, White Canyon WSA 2-187, Baboquivari Peak WSA 2-203B, Picacho Mountains WSA 2-19a, Hells Canyon WSA 2-119, Mount Wilson WSA 2-01a, and Ragged Top WSA 2-197. All seven WSA's have outstanding opportunities for solitude and primitive recreation. In addition wilderness designation would protect at least 20 sensitive plant species, 4 special-status wild-life species, 6 crucial habitats in a natural condition; as well as watershed, scenic, and culturally sensitive areas. Wilderness designation would provide the maximum multiple use values in the above seven WSA's.

	NAME	ADDRESS
1	<u>David D. Miller</u>	<u>1425 E. Glenn St., Tucson</u>
2	<u>Joseph P. Goldstein</u>	<u>" " " " " "</u>
3	<u>Paul Carey</u>	<u>3807 Palmside Tucson</u>
4	<u>William Montgomerie</u>	<u>5831 Beasdale Ct. Avondale Va</u>
5	<u>Carol P. Jewell</u>	<u>P.O. Box 4237 E. Tucson 85733</u>
6	<u>Robert C. Smith</u>	<u>2328 NW 9th St. Seattle, WA 98117</u>
7	<u>Julia M. Buerge</u>	<u>2370 NW 9th St. Seattle WA 98117</u>
8	<u>Lynn Bandiera</u>	<u>84 North St. Vermont, VT 05096</u>
9	<u>Bob Jones</u>	<u>7318 N. Tucson Via, Tucson</u>
10	<u>Shirley J. Henry</u>	<u>7318 N. Tucson Via Tucson 85704</u>
11	<u>Bob Witt</u>	<u>620 N 7th Ave Tucson</u>
12	<u>Robert K. K.</u>	<u>132 E University, Tucson, AZ</u>
13	<u>Ed W. Bellamy</u>	<u>6160 E. Bellvue Tucson, AZ</u>
14	<u>Michael E. Day</u>	<u>921 E. 8th St Tucson AZ 85719</u>
15	<u>Janis Schatzman</u>	<u>2350 E. Water A. 209 Tucson 85719</u>
16	<u>Sarah J. Jike</u>	<u>2502 E. Leo Tucson 85716</u>
17	<u>Victoria Radtke</u>	<u>6051 S. Montana</u>
18	<u>Don E. Lee</u>	<u>324 E. Lee Tucson</u>

To: Bureau of Land Management, Phoenix District Office

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NAME

ADDRESS

- 1. Arnel Jaramaz 436 N. Norris Tucson 85719
- 2. Mr & Mrs Buckleberry 4406 E. 5th Tucson AZ 85712
- 3. Shirah C. Whitsett 531 S. Quorum Av. Tucson, AZ 01
- 4. Paul W. Brown 2110 Box 10929 Tucson 85720
- 5. Ar J. Fin 3357 N. Graham Tucson 85745
- 6. Cherie Cooper 855 River Parkway near A-2 85705
- 7. Kate Forester 7942 E. Sabino Sunrise Ct 85715
- 8. Janice Albee 1036 N. Perry Ave. Tucson 85705
- 9. Daniel Hoffert 200 S. Arroyo Rd (W) Tucson 10
- 10. George Zepf 737 E. 1st St., Tucson
- 11. Ralph Wronko 1224 N. Belvedere Tucson 85712
- 12. Bill Coit 2127 E. Hollen Tucson 85719
- 13. Diane DiPasco 2127 E. Hollen Tucson 85719
- 14. Gayle Hestegren 2224 S. 4th St Tucson 85719
- 15. Richard M. Morris 3993 N. Campbell #1, Tucson 85719
- 16. M. Galle 8000 9858 Tucson, AZ
- 17. Judith-Jean Williams P.O. Box 43964 Tucson, AZ 85720
- 18. Shirah-Jean Williams P.O. Box 43964 Tucson AZ 85723

120

To: Bureau of Land Management, Phoenix District Office

We, the undersigned, urge the Bureau of Land Management to include the following seven WSA's as "recommended for wilderness" in the Proposed Action of the Phoenix Final Wilderness Impact Statement when released: Coyote Mountains WSA 2-202, White Canyon WSA 2-187, Baboquivari Peak WSA 2-203B, Picoacho Mountains WSA 2-194, Hells Canyon WSA 2-119, Mount Wilson WSA 2-014, and Ragged Top WSA 2-197. All seven WSA's have outstanding opportunities for solitude and primitive recreation. In addition wilderness designation would protect at least 20 sensitive plant species, 4 special-status wild-life species, 6 crucial habitats in a natural condition; as well as watershed, scenic, and culturally sensitive areas. Wilderness designation would provide the maximum multiple use values in the above seven WSA's.

NAME

ADDRESS

- 1. Arnel Cooper 2638 N. La Valle, Tucson AZ 85719
- 2. James J. ... PO Box 35503 - Tucson AZ 85719
- 3. Michael ... 917 E. Gracill Dr Tucson 85719
- 4. Arnel Cooper 5255 E. 20th St Tucson, 85711
- 5. Edie Olsen 207 W. Dade Tucson 85705
- 6. Jim ... 468 E. Alvin 85205
- 7. Jim ... P.O. Box 61, Sonoma, CA 95963
- 8. Marjorie Johnson PO Box 43068, Tucson, Arizona 85733
- 9. Jan Vanderpool 1840 W. Encinita #214, Mesa, AZ 85202
- 10. \_\_\_\_\_
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121

	NAME	ADDRESS
1	<u>Ralph Henry</u>	<u>300 W. 55th St New York, NY 10019</u>
2	<u>Robert Lee</u>	<u>2829 E. 57th St. Tucson 85716</u>
3	<u>Diane Dwyer</u>	<u>500 E Rudasill Rd Tucson 85704</u>
4	<u>Dan Smith</u>	<u>1120 E. RAINSTON #611 TUCSON</u>
5	<u>Charles D. Jones</u>	<u>2321 N. Madelyn Cir Tucson 85712</u>
6	<u>Barry Johnson</u>	<u>4025 N 10th Ave Tucson 85719</u>
7	<u>Maac Fein</u>	<u>2323 E. 11th St PS 719</u>
8	<u>James P. Jago</u>	<u>415 E. 57th St. #3 85705</u>
9	<u>Douglas Symes</u>	<u>4225 N 10th #811 85719</u>
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	NAME	ADDRESS
1	<u>Andie Pind</u>	<u>1105 E. Silver, Tucson, AZ</u>
2	<u>Judith Ann Dines</u>	<u>1916 5th St, Tucson, Az.</u>
3	<u>Robert Dink</u>	<u>1916 5th St Tucson Az 85719</u>
4	<u>Jim O'Brien</u>	<u>1914 N. Santa Rita Tucson AZ</u>
5	<u>Mary Jane With</u>	<u>104 E 9th St. Tucson, AZ</u>
6	<u>G. H. Zalkowich</u>	<u>LPL, Vof A, Tucson, AZ 85721</u>
7	<u>P. A. Delaney</u>	<u>2660 Alvernia, Tucson</u>
8	<u>A. J. Jorgensen</u>	<u>✓</u>
9	<u>JOE SACCHINARO</u>	<u>SUPO Box #10726 Tucson, AZ.</u>
10	<u>John D. Thayer</u>	<u>2823 N. Eastgate Tucson AZ</u>
11	<u>James H. Halperin</u>	<u>40 S. Kelly Ave. Daytona Beach, FL</u>
12	<u>Carmon W. Sherman</u>	<u>2823 N. Eastgate, Tucson</u>
13	<u>Bob</u>	<u>3425 E 2nd St 209 Tucson</u>
14	<u>Dorinda Sedentaya</u>	<u>P.O. Box 51 Hiron, Montana</u>
15	<u>Michael Palmer</u>	<u>" " " "</u>
16	<u>Mr and Mrs G. H. Robinson</u>	<u>4456 3rd Ave #1700 Tucson AZ 85712</u>
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To: Bureau of Land Management, Phoenix District Office

We, the undersigned, urge the Bureau of Land Management to include the following seven WSA's as "recommended for wilderness" in the Proposed Action of the Phoenix Final Wilderness Impact Statement when released: Coyote Mountains WSA 2-202, White Canyon WSA 2-187, Baboquivari Peak WSA 2-203B, Picoacho Mountains WSA 2-194, Hells Canyon WSA 2-119, Mount Wilson WSA 2-01A, and Ragged Top WSA 2-197. All seven WSA's have outstanding opportunities for solitude and primitive recreation. In addition wilderness designation would protect at least 20 sensitive plant species, 4 special-status wildlife species, 6 crucial habitats in a natural condition; as well as watershed, scenic, and culturally sensitive areas. Wilderness designation would provide the maximum multiple use values in the above seven WSA's.

	NAME	ADDRESS
1	<u>Kim M. Jones</u>	<u>7241 E. CALLE CUERNAVACA TUCSON, AZ 85710</u>
2	<u>Andy Hayden</u>	<u>6737 E. David Ave. Tucson, AZ 85730</u>
3	<u>Michael S. Edwards</u>	<u>5190 W. Sweetwater Ter. DE. Tucson 85745</u>
4	<u>Marshall W. Snelock</u>	<u>1222 DENVER DR. TUCSON AZ 85747</u>
5	<u>William H. Travis</u>	<u>6802 E. MARY DR. TUCSON AZ 85730</u>
6	<u>Philip M. Gailmer</u>	<u>3000 W. CAMINO CLAYTONES</u>
7	<u>Michael Snelock</u>	<u>7149 E. FORT AVENUE TUCSON AZ 85710</u>
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761 W. Roger Road  
Tucson, AZ 85705  
February 1st, 1995

Marlyn Jones  
Phoenix District Manager  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Hello,

I'm writing to comment on the wilderness recommendations that have been published in a Draft Wilderness Environmental Impact Statement. I wish to voice my support for wilderness designation for all six of the Wilderness Study Areas and ask that you include the "Ragged Top" unit which was previously dropped.

I am especially concerned about Baboquivari Peak. Not only is it an extremely beautiful area but a sacred one too. I feel we must respect the beliefs of the peoples who have lived in this desert for centuries.

The Coyote Mountains sound very interesting too. It's described by the BLM as "highly scenic" and as a place that provides outstanding opportunities for both solitude and primitive recreation. Designation would benefit habitat for 7 special status wildlife species and protected plants. The Hohokam compound is especially intriguing. Since there is little cattle use and no mining at this time there is little opposition. We need to protect more areas nearby

2.

the rapidly growing cities.

For the same reason I support Wilderness designation for the Picacho Mountains. You may think it doesn't merit designation due to its small size and proximity to I-10. For the same reasons I support designation. It is highly accessible to the hordes from Phoenix and Tucson. Every time I drive to Phoenix I wish I had the time to stop and explore not only Picacho Peak but the Picacho Mountains too. Having learned that these mountains are home to the greatest number of Desert Tortoises in Arizona convinces me that this area should be preserved.

White Canyon is a beautiful riparian area. Once again - it is relatively close to Phoenix and should be saved for the ever growing number of outdoor enthusiasts. The fact that it has "moderately favorable" potential for copper production is not a reason for excluding it from wilderness designation. As I see it, the copper companies are bailing out of Arizona and leaving us with huge scars on the land and pollution problems. Do we really need to jeopardize this area because its "moderately favorable"?

I believe Mt. Wilson should be preserved for the bighorn sheep habitat it provides. Likewise, Cedar Basin in Hell's Canyon provides crucial habitat for the Gilbert's Skink.

In my opinion, if we preserve these areas today, future generations will still have these resources at their disposal. Once we destroy them, the people of the 21<sup>st</sup> century will never know what they missed.

Sincerely,  
Maria D. Collard

Charles J. Motter  
Box 34, Cortaro, AZ  
Feb 5, 1985 85220

District Mgr., B. & T.  
Phoenix Dist. Office  
2015 W. Deer Valley Rd  
Phoenix, Az. 85027

Dear Sir:

I wish to register an objection to the change of Federal lands in Arizona from their present classification to that of a "Wilderness" classification. Such a change will not effectively help or preserve wildlife. Further, it will limit the use of the land for recreation to a very few select people, which is grossly unfair to the majority of U.S. citizens.

I feel that we have at this time a sufficient amount of land in the "Wilderness" category in the United States to show future generations what true wilderness is.

Very truly yours,  
Charles J. Motter

3426 N. Renner Road #4h  
Tucson, AZ 85705  
February 4, 1985

Mr. Marilyn V. Jones, District Manager  
Phoenix District Bureau of Land Management  
2015 West Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones:

I have reviewed the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) for six small Wilderness Study Areas (WSA) with a total acreage of 54,713.

The Proposed Action of the BLM to recommend only 2,065 acres for Wilderness displays the BLM's insensibility to, or ignorance of, Arizona's ecological problems.

These six WSAs and others should be designated Wilderness, if for no other reasons, as watershed for uncontaminated water supplies and for the preservation of diverse wildlife game peaks.

I am enclosing a copy of the comments I made on this DEIS at the public hearing in Tucson on January 30, 1985 to fully explain these statements.

Sincerely,

*Gertrude A. Hoobgraf*  
Gertrude A. Hoobgraf

COMMENTS ON THE PHOENIX RESOURCE AREA WILDERNESS  
DRAFT ENVIRONMENTAL IMPACT STATEMENT - 1984

18 - 1 } The first section of the Summary of this DEIS, Purpose and Need, indicates that two issues were not considered "high concern" which I feel should be the top of the priority list for the establishment of wilderness areas. These issues are WATERSHED and WILDLIFE.

18 - 2 } Later in the DEIS some data are presented on wildlife habitat and social-status of a few species of plants and animals, but, no data are presented indicating rainfall in these six WSA's, what equifers these watersheds might feed or whose water supply might be affected if mining, development and overgrazing occurs in these areas. Both of these issues were virtually ignored in the considerations for Proposed Action.

As the human population of the State of Arizona increases, more consideration must be given to maintaining areas for uncontaminated watershed. We are frequently told of increasing contamination of wells by leachate from mine tailings and strip mines, industrial and urban effluents and dumps, and non-point source contaminants from agriculture and road surfaces. In the future our water supplies, both from wells and the CAP, will have to be mixed with clean water in order to be usable for human consumption, agriculture and industry. Other wells will have to be shut down. Wilderness areas may be our only sure source of clean water.

As an example, consider the Picacho Mountains WSA. As described in the DEIS it is close to the town of Eloy and Picacho and Interstate 10, it is surrounded by croplands and grazing areas and the CAP canal will be built nearby. Wells now supply water for this area, in the future some water may



be supplied by the CAP. As the fertilizers, pesticides, road runoff and salts from the CAP water seep into and contaminate the aquifer, the only sources of uncontaminated water may be from the Picocho Mountains and Picocho Peak State Park. If mining for the extraction of copper and zinc is allowed in the Picocho Mountains, contamination will increase due to mine tailing leechate and other materials produced by human disturbance. There is a very strong possibility of poor water quality in this region and in other parts of the State unless more areas are managed for uncontaminated watershed.

We need not only the six WSA's listed in this DEIS but also larger ELM Wilderness Areas for future clean water supplies. The fact that one can see human structures from the peaks or can hear trains, cars and planes or that there are a few exploratory mine holes has no bearing on an area's value as watershed.

Native plants and animals are resources just as much as minerals and energy materials. Studies of arid land plants show the value of using some native plants as human food thereby reducing the amount of water necessary to grow food as compared to that used on crops we are growing now. Other studies of plants show that some have previously unknown medicinal value and may be breakthrough in curing or preventing human diseases.

Animal physiology studies have increased our knowledge of the operation of human organ systems. Some of these are desert animals whose adaptations to the high temperature, low water environment have helped us understand respiratory, circulatory and excretory systems. Other animal studies have discovered materials in blood or tissues which can be synthesized and used

for human medicinal purposes. Desert animals may be needed for other medical research.

Both plants and animals are used for biological controls. Here studies of this will enable us to reduce the use of chemicals which are not species specific, that is, they are toxic not only to the target species but to other plants and animals, including humans.

In the future some of our native animals may be used as a human food supply replacing our present domesticated animals which are not adapted to the desert environment and destroy its vegetation. Native animals would be more efficient in the fragile desert environment.

It behooves us to maintain diverse gene pools of both plants and animals so that if we use these for food, medicine or biological controls, we will have various gene pools that can adapt to natural changes in climate and habitat and resist diseases.

Again, taking the Picocho Mountains WSA as an example, this area supports populations of desert tortoise, Gila monster, kit fox and five species of game animals as well as many bird species, it is also an area where bighorn sheep may be reintroduced since it once supported these animals. There are other areas in Arizona and other states where these animals exist, but unless we preserve the Picocho Mountain populations we will reduce the diversity of gene pools. The same is true for its plant populations.

Of the six WSA's the one that is most important for wildlife preservation is White Canyon. Although no special-status wildlife are listed in the DEIS, exploration of this area has shown large numbers of raptors and other birds

living there, and, with its perennial water source, it must have many other animal populations. But, most importantly, it is an attraction and food and water source for migratory birds including waterfowl.

Riparian habitat is rapidly being destroyed in the United States, in many cases being replaced by lakes formed by dams. Since these lakes are used for agricultural water supplies, flood control and power, their levels change frequently and drastically. Their shore areas are biological deserts, that is, they are neither aquatic systems nor terrestrial systems and therefore supply little food for wildlife.

There are very few riparian areas left in Arizona. Every remaining one should be preserved including White Canyon so that the chain of food and resting areas for migratory birds can be maintained.

We cannot live without migratory birds. Migratory waterfowl are a biological control of aquatic life, and migratory songbirds are the major biological control of insects.

Native plants and animals are resources just as much as minerals and energy materials. We do not know now which ones we might need in the future for food, medical purposes and biological controls just as we do not know now how much mineral or energy materials we may need in the future. We have been rapidly depleting the habitat of native plants and animals by mining, overgrazing and developing for human habitation in most of the State of Arizona, now we should retain the remaining comparatively undisturbed areas for biological resources. All of the six WSA's listed in this DEIS should be managed as Wilderness to diversify gene pools. Additional areas should also

be studied and other larger areas be designated Wilderness for uncontaminated watershed and diverse populations of wild plants and animals.

The Proposed Action of this DEIS recommending only 2,065 acres for Wilderness shows the insensibility of the Bureau of Land Management to our ecological problems.

Gertrude A. Hochgraf

18-1 The FEIS has identified wildlife as an issue in White Canyon WSA where nondesignation would result in impacts to five special-status species, and in Mt. Wilson WSA where nondesignation would result in impacts to crucial desert bighorn sheep habitat.

Wildlife is not considered an issue in the remaining WSAs because special-status wildlife habitat is not expected to be impacted significantly by wilderness designation or nondesignation in these WSAs. See Chapter 2 for a further discussion of the issues analyzed in this FEIS.

18-2 Watershed is not identified as an issue in any of the WSAs because water quality is not expected to be impacted by wilderness designation or nondesignation. State laws addressing water quality require mandatory compliance regardless of designation. See Chapter 1 for a further discussion of the issues analyzed in this FEIS.

18-3 See response 18-2.

18-4 See response 18-1.



## United States Department of the Interior

NATIONAL PARK SERVICE

 WESTERN REGION  
 455 GOLDEN GATE AVENUE, BOX 16063  
 SAN FRANCISCO, CALIFORNIA 94116

IN REPLY REFER TO:

L7619(WR-RPE)

January 29, 1985

## Memorandum

To: District Manager, Bureau of Land Management, Phoenix,  
Arizona District

From: Regional Director, Western Region

Subject: Review of Phoenix Draft Wilderness Environmental Impact  
Statement DES 84/65

In accordance with your letter of December 1984, we have reviewed the subject document and have the following comments:

Lake Mead National Recreation Area

The only Wilderness Study Area (WSA) that affects Lake Mead National Recreation Area is Mount Wilson - WSA 2-01. Although this unit may not meet wilderness criteria because it lacks outstanding primitive recreation opportunities and special features unique to the area, we do not believe off-road vehicle (ORV) use should be allowed on these lands as identified under Provision 2 of the proposed action on page 9.

This area is bordered on three sides by National Park Service (NPS) lands on which off-road use of motor vehicles is prohibited. Allowing ORV use on the Bureau of Land Management (BLM) lands could create problems of ORV users crossing onto NPS lands with detrimental impacts.

The mountain range, contained both within the Wilderness Study Area and in Lake Mead National Recreation Area, is important bighorn sheep habitat. This knowledge is also imparted by BLM on page 47 of the statement which indicates that almost the entire Mount Wilson WSA is a crucial desert bighorn habitat classed as "high value" in the the Black Mountain Habitat Management Plan (BLM 1981). For this reason, vehicular traffic should be restricted to the two roads that presently offer access to this unit.

We are also concerned with the impacts that may occur from mining on the far north end of the unit. As discussed on page 66 of the statement, long term surface-disturbing land users could degrade the area. Non-designation would permit mineral exploration and development with the associated road building and surface disturbance.

If the Mount Wilson unit does not become wilderness, we recommend that the mountainous portion to the north be identified as "environmental protection" to protect bighorn sheep and, if any mineral leasing occurs, that BLM protect the portion of the unit critical to bighorn sheep with stipulations. The minerals and energy discussion on page 39 does not indicate a high favorability for minerals in the mountainous portion of the unit.

Cultural Resources

It is difficult to address the adequacy of the cultural resource surveys and documentation because no technical reports are provided and the DES does not discuss specific resources or their potential significance.

The methodology for the various inventories/surveys referenced on page 53 needs to be defined in the final document. For example, how intensive is a Class II survey? What is a "judgmental survey"?

The DES also does not address cultural resources compliance procedures or what, if any, consultation has occurred between the agency and the State Historic Preservation Office.

While "cultural resource sensitivity maps" may have some usefulness as a theoretical construct or a heuristic device, they provide, in fact, very little in the way of concrete data regarding specific site significance and impacts in an area such as Arizona where prehistoric sites are numerous and complex but varied in terms of size, environmental location, resource utilization, etc.

*William H. Chapman*

19-1

The Mount Wilson WSA is considered suitable for wilderness under the Final Phoenix EIS proposed action. As wilderness, off road vehicle use would not be allowed. ORV use is currently low and is confined to 4.25 miles of trail. Moreover, the National Park Service (NPS) controls access to this WSA on all sides except for the southeast corner. Therefore, ORV use under nondesignation would not impact NPS managed lands.

cc:  
IAS  
Supt., LAMR  
WASO 762



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE



Ecological Services  
2934 W. Fairmount Avenue  
Phoenix, Arizona 85017

February 4, 1985

Memoandum

To: District Manager, Bureau of Land Management, Phoenix District  
Phoenix, Arizona

From: Field Supervisor, PWS, Ecological Services, Phoenix, Arizona

Subject: Review of Phoenix Draft Wilderness Environmental Impact Statement

We have reviewed the subject document and request that you consider our comments which follow.

After visiting some of the wilderness study areas (WSAs) and reviewing the site descriptions for all six WSAs, we cannot endorse any of the described alternatives. Instead, we believe a combination of the All Wilderness and No Wilderness alternatives would provide the greatest protection for wildlife resources, maintain the availability of these areas for future energy and mineral development, and comply with the purpose of establishing wilderness. Our recommendation is:

Mount Wilson WSA-All Wilderness alternative;

Hells Canyon WSA-No Action alternative which includes implementing the Black Canyon MFP and managing the area as part of Buckhorn Mountains Scenic Area;

White Canyon WSA-No Action alternative-In addition, we urge BLM to develop and implement a riparian habitat management plan for White Canyon that is similar to the Burro Creek Riparian Management Plan;

Piacocho Mountains-No Action alternative which includes implementing the Silver Bell MFP and developing and implementing a wildlife habitat plan for mule deer, javelina, and desert tortoise and possible bighorn sheep reintroduction;

Coyote Mountains WSA-All Wilderness alternative;

Baboquivari Peak WSA-No Action alternative which includes implementing the Silver Bell/Baboquivari Habitat Management Plan for desert bighorn sheep, whitetail deer, and other big and small game species.

-2-

We disagree with the reasons presented in Chapter 2 for recommending that Mount Wilson and Coyote Mountains WSAs not be designated as wilderness under the Proposed Action. According to the DEIS, Mount Wilson WSA lacks outstanding primitive recreation opportunities. In Chapter 3, this 24,281 acre WSA is described as 11.3 miles long and five miles wide with remote rugged valleys and canyons creating topographic complexity with outstanding opportunities for solitude. Outstanding primitive recreation opportunities are not required for a wilderness area if it has outstanding opportunities for solitude (Section 2C, The Wilderness Act of 1964, P.L. 88-577). Additionally, we find it difficult to believe that the area and complex topography of Mount Wilson WSA would not provide such recreation opportunities. Baboquivari Peak WSA, which is only 2065 acres but recommended for wilderness by BLM in the Proposed Action, is described as providing outstanding opportunities for rock climbing, hiking, camping, sightseeing, and photography. All of these primitive recreation opportunities except rock climbing would also be available at Mount Wilson WSA which is more than ten times as large as the Baboquivari Peak WSA.

The second reason given for not recommending wilderness for Mount Wilson WSA is the absence of special features or resource values unique to this area alone (page 9). BLM must not consider the magnificent vistas from Mount Wilson of Lake Mead, the Grand Canyon, and the mountain ranges in Nevada to be a unique feature or value of this WSA. We were unaware that this was one of the criteria used to determine if an area is suitable for wilderness. It is not one of the requirements listed in the Wilderness Act. Please inform us as to where this criterion is described as a requirement for wilderness.

Coyote Mountains WSA is not recommended for wilderness in the Proposed Action because its small size (5080 acres) lessens the wilderness caliber for solitude and primitive recreation (page 11). Additional reasons, which are listed as minor, are lack of legal public access and existing mining claims. Yet, this WSA has a number of characteristics in common with Coyote Mountains WSA. Both are small in size (less than 5500 acres), have no public access, and are located on the west edge of the Altar Valley. Mineral potential is described in the GEM assessments as similar. Coyote Mountains WSA has a 3500-foot elevation change and Baboquivari Peak WSA has a 4200-foot elevation change. Both WSAs have rugged topography and vegetation representative of four habitat types: saguaro-palo verde, interior chaparral, oak woodland, and desert shrub and woodland riparian. Human imprints are few and these have weathered or deteriorated and no longer affect either WSA's wilderness character. There appear to be two major differences between these WSAs, size and the presence of mining claims. Baboquivari Peak WSA is recommended for wilderness despite its small size because the complexity and ruggedness of the terrain coupled with dense vegetation disperses and screens recreationists from others in the vicinity (page 35). This area provides outstanding opportunity for solitude and primitive recreation but these may be compromised because of the WSA's small size. Coyote Mountains WSA is not recommended for wilderness despite the fact that its similar rugged terrain and dense vegetation also provide outstanding opportunities for solitude and primitive recreation yet it is 2.4 times larger than Baboquivari Peak WSA (page 32). Thus, the major reason for not recommending Coyote Mountains WSA for wilderness appears to be invalid.

The information presented in the DEIS suggests that the major consideration in the formulation of the Proposed Action was whether any of the WSAs had mining claims. Of the six WSAs discussed in this DEIS, the only one recommended by BLM for wilderness designation, Baboquivari Peak, is the only one with no mining claims. We remind BLM that although five of the WSAs have mining claims, no claim has been validated. Only one active mine is known on the five WSAs and it is at Hells Canyon. In addition, "wilderness designation of Baboquivari Peak WSA" or the other five WSAs "would not create an irretrievable or irreversible commitment of any multiple use resource within the WSA" especially mineral development. "If, in the future, Congress feels that resources present at Baboquivari Peak" or other WSAs "must be developed in the national interest, they can modify the law to allow for the development" (page 91). Wilderness designation would not prohibit the development of valid mining claims. However, once an area is impacted by mining, motorized vehicle use, and other types of development, its wilderness values are degraded and may be lost for decades or longer. We urge BLM to recommend wilderness designation of WSAs which contain mining claims to protect wilderness values and wildlife resources for future enjoyment while maintaining the option of developing these areas at any time in the future.

Specific Comments

Page 35, Paragraph 4 - This section fails to mention the desert grassland habitat present at Baboquivari Peak WSA as indicated in Table 3-8.

Page 47, Table 3-8 - Information in this table does not reflect the presence of chaparral or desert shrub riparian habitats at Coyote Mountain WSA as described on page 31 or the presence of chaparral habitat at Baboquivari Peak WSA.

Page 48, Table 3-10 - Please amend this table to show that the mountain skink does not occur at Coyote Mountains WSA.

Page 50, Coyote Mountains WSA - Mountain skink should be substituted for Gilbert's skink.

Page 60, Table 3-16 - The Category 1 candidate species, Tumamoca maddougallii, could occur at Picacho Mountains, Coyote Mountains, and Baboquivari Peak WSAs.

Thank you for the opportunity to review this Environmental Impact Statement.



cc:  
Regional Director, FWS, Albuquerque, NM (ABR)

129

20-2

20-3

20-1

A Resource Management Plan is being prepared for the Phoenix Resource Area. This plan will consider alternative forms of management (besides wilderness) for the White Canyon Area. Types of management being considered for White Canyon include classification as an area of critical environmental concern and development of a riparian management plan. The draft resource management plan will be released for public review in 1987.

20-2

The final EIS has been revised. Only those habitats and species that would be significantly impacted by the Proposed Action or an alternative are analyzed in the EIS.

20-3

The BLM botanists do not agree that Tumamoca maddougallii could occur in the Baboquivari WSA due to the elevation of the area.

21

Marlyn Jones  
 Phoenix District Manager  
 B.L.M.  
 2015 West Deer Valley Rd.  
 Phoenix, Arizona 85027

I am pleased that the B.L.M. recommended Baboquivari Peak as a new wilderness area. I encourage wilderness in the state of Arizona and throughout the country. I was disappointed at the B.L.M.'s exclusion of the Coyote Mountains, Mt. Wilson, the Pinalo Mountains, Hell's Canyon, and White Canyon for wilderness recommendation. I strongly encourage the B.L.M. to reconsider these areas and include the areas, above mentioned, for wilderness status.

Sincerely,

*Robert M. Jones*

*Bob Jones*

22



UNITED FOUR WHEEL  
 DRIVE ASSOCIATIONS

of U.S. and CANADA  
 8900 N. Camino de Anza Tucson, AZ 85704

Mr. Marlyn V. Jones, District Manager  
 Bureau of Land Management Phoenix District - USDI  
 2015 W. Deer Valley Rd.  
 Phoenix, AZ 85027

Feb. 12, 1985

Dear Mr. Jones:

Having just reviewed your "Phoenix Draft Wilderness EIS" I would like to applaud you for a job well done. You very aptly illustrated your professional expertise and logical judgement by using pragmatic facts in your decisions on what was really suitable for "wilderness". In consideration of the recent AZ Wilderness Act that created more than 3 million acres of Wilderness in AZ we really don't need to add tiny fragments of very low quality "wilderness". These "inferior" areas would only lessen the overall quality and true meaning of the word "wilderness".

The one fault I could find with your EIS is the vivid lack or avoidance of explanation that the areas dropped from "wilderness" study will none-the-less be quite well protected under multiple-use management. The lay public is left to believe that once these areas fall under multiple-use any unique qualities they may have had will be desecrated. You & I both know this to be a total mis-perception. Your professional expertise and the regulations & mandates you operate under will more than insure that ALL resource values, including "wilderness", will not fall to ruin. I only wish you could have more clearly stated this to the public in your EIS.

The only other comment I would like to state is more in the form of a question. Why don't you just exchange the Baboquivari USA with the Papagos? It really is their rock you know. It's not really big enough to really qualify for "wilderness" and will present all sorts of large management problems for such a tiny spit of land. Why not just give it back to the Indians?

Thanks for the chance to have a word or two about the management of lands that are near and dear to my heart. I hope what I have said here will help you in making the final management decisions. If I can be any help to you in making your management plans a reality please call any time.

Sincerely,

*Stu Bangson*  
 Stu Bangson  
 Director, Land-Use  
 UPWDA

CC: AZ Assoc. 4WD Clubs  
 Dean Bibbes, St. Dir. BLM

23

TO: The Honorable Mo Udall  
 FROM: Drew Crook, 5121 North 13th Avenue, Phoenix, AZ. 85013-2180  
 DATE: 08 February 1985  
 RE: PHOENIX Draft Wilderness Environmental Impact Statement

The Bureau of Land Management should be told to scrap their PHOENIX Draft Wilderness EIS and start the process from scratch. This draconian action is warranted because the BLM has clearly demonstrated in this document a monumental misunderstanding of the task Congress has ordered them to undertake.

The BLM is usurping Congress' prerogatives to establish the priorities on conflicting demands for specific parcels of public lands managed by the BLM. The Bureau's narrow interpretation of wilderness' function fails to encompass the true intent of Congress to preserve and protect unique values and resources of our public lands. In the BLM's opinion, wilderness' only value is for primitive recreation. They ignore values like unique flora and fauna habitats, geological structures, watershed protection, and wildlife and plant refuges.

The EIS is permeated with intrinsic omissions and contradictory logic. They cite the Picacho Mtns.' proximity to Phoenix and Tucson as a reason for wilderness and later contradict themselves by citing it's proximity to Eloy as a reason against wilderness.

White Canyon is recommended by the BLM for no wilderness protect because of it's small size. The surrounding Forest Service lands are ignored in their analysis. Mt. Wilson's proximity to the 40,000 acre WSA in the National Park Service land of the Lake Mead Recreation Area is also ignored.

The only Arizona BLM land known to be a Black Bear Habitat (White Canyon) also contains what may well be the world's largest Pinion Pine with an 11 foot circumference and approximate 55' height. Neither are cited in the EIS.

Possibly the largest expanding herd of Big Horn Sheep resides in the Mt. Wilson WSA. The benefits of Wilderness designation to this wildlife habitat are grossly undervalued and glossed over. So is the unique opportunity for Big Horn Sheep hunters to be able to experience an "Alaska style primitive hunting experience" in the Mt. Wilson WSA. Perhaps the most blatant inconsistency in the BLM's EIS is that while the BLM recommends ONLY ONE WSA for Wilderness designation (Baboquivari), and releases all the other five units for development of their meager and vague grazing and mining potential; the BLM's no action (current status) would recommend no areas for Wilderness designation, but would manage four of the units as if they were wilderness.

Furthermore, the BLM states in the EIS on page 13 column 2 paragraph 2 that:  
 The Mount Wilson, Picacho Mountains, Coyote Mountains, and Baboquivari Peak are considered manageable as wilderness under any alternative. There are no current or anticipated land uses within these WSAs considered detrimental to the long-term manageability of the areas as wilderness.

Why then has the BLM only recommended only Baboquivari (and only a miniscule portion of it) as wilderness?

24

MICHAEL SIMONSON  
 Box 219  
 PEORIA, AZ 85345

FEBRUARY 11, 1985

MARLYN V. JONES  
 DISTRICT MANAGER  
 BUREAU OF LAND MANAGEMENT  
 PHOENIX DISTRICT OFFICE  
 2015 W. DEER VALLEY RD.  
 PHOENIX, AZ 85027

DEAR MR JONES:

AS OWNER OF 25 LODE MINING CLAIMS ON THE EASTERN BOUNDARY OF THE HELL'S CANYON W.S.A. (2-119) I WISH TO MAKE THE FOLLOWING COMMENTS. THE "PROPOSED ACTION" AS OUTLINED IN THE PHOENIX DRAFT WILDERNESS ENVIRONMENTAL IMPACT STATEMENT (DECEMBER 1984) APPEARS TO BE THE BEST COMPROMISE UNDER THE CIRCUMSTANCES. THERE IS NO DECISION THAT WOULD PLEASE EVERYBODY. THE ENVIRONMENTALISTS' BLANKET RECOMMENDATION THAT ALL W.S.A.'S BE CONVERTED TO WILDERNESS AREA'S IS IN DIRECT CONTRADICTION TO THE BLM'S MANDATED POLICY OF MULTIPLE USE.

COMMENTS IN REFERENCE TO MY CLAIMS ON PAGES 39, 40 AND 75 ARE FAIR AND ACCURATE.

THE HELL'S CANYON W.S.A. (2-119) IN MY OPINION IS NOT SUITABLE AS A WILDERNESS AREA, FOR THE VERY REASONS PRESENTED IN YOUR REPORT.

LET ALL THE PEOPLE OF ARIZONA SHARE IN IT'S NATURAL RESOURCES, BOTH ECONOMIC AND AESTHETIC!

SINCERELY,  
 Michael Simonson


**ARIZONA  
STATE  
PARKS**

 1888 WEST ADAMS STREET  
PHOENIX, ARIZONA 85007  
TELEPHONE 802-355-4174

 BRUCE RABBITT  
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STATE LAND COMMISSIONER

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DIRECTOR

 ROLAND H. SHARER  
DEPUTY DIRECTOR

February 8, 1985

 Mr. Marilyn V. Jones,  
District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 N. Deer Valley Road  
Phoenix, AZ 85022

 Re: Draft Resource Management Plan  
and EIS  
001-BLM

Dear Mr. Jones:

I have reviewed the draft report submitted for the above project. The report appears to consider adequately the cultural resources of the project area at this stage of investigation. Pursuant to 36 CFR, Part 800 of the Advisory Council's regulations ("Protection of Historic and Cultural Properties"), we look forward to continuing the consultation process regarding the cultural resources of this project.

We appreciate your cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions about any of this, please contact me at (602) 255-4174.

Sincerely,

 Teresa L. Hoffman  
Archaeologist

 for Donna J. Schober  
State Historic Preservation Officer

TLH:rmj

 Marilyn Jones  
Phoenix District Manager  
B.L.M.  
2015 West Deer Valley Rd.  
Phoenix, Arizona 85027

I am pleased that the B.L.M. recommended Baboquivari Peak as a new wilderness area. I encourage wilderness in the state of Arizona and throughout the country. I was disappointed at the B.L.M.'s exclusion of the Coyote Mountains, Mt. Wilson, the Picacho Mountains, Hell's Canyon, and White Canyon for wilderness recommendation. I strongly encourage the B.L.M. to reconsider these areas and include the areas, above mentioned, for wilderness status.

Sincerely,



27

28

February 14, 1985

Feb 14, 1985  
HC 62 Box 510  
Camp Verde, AZ  
86322

Dear Sir,

I support wilderness designation for the Pinalco Mountains and the Hieroglyphic Mountains. I have seen a good chunk of both of these units. I have hiked to the summits of Newsum Peak, Garfield Mountain, and Hellgate Mountain, and consider both mountain ranges to be very rugged and scenic. These mountains offer great opportunities for solitude. The desert vegetation was outstanding in both units. Wilderness designation is the best way to protect these mountains, not just for us, but for posterity. I hope I can count on your support.

Sincerely,



George Horn  
3605 N. 36 St. #104  
Phoenix, Arizona 85006

District Manager, BLM  
Phoenix District Office, 2015 W Deer Valley Road  
Phoenix, Arizona 85027

**Commentary On Proposed Wilderness Study Areas**

After carefully examining the draft wilderness impact statement, I recommend, as a private citizen living in Yavapai County, and having lived for 22 years in Maricopa County, that in considering the six USAs for wilderness designation, priority should be given in the following order: Baboquiviri Peak, Hellie Canyon, Wilson Mountain, Coyote Mountains, White Canyon and Pinalco Mountains. In the event that one or more of these areas do not make it into Wilderness, it would still be the responsibility of the BLM to provide the protection that their respective areas deserve, to preserve their distinctive values.

**By area, I recommend:**

Wilson Mountain—all wilderness or enhanced wilderness, due to its importance as a bighorn sheep habitat and its advantageous proximity to Lake Mead Recreational Area.

Hellie Canyon—all wilderness because of the threat of mineral development which would destroy its wilderness values (or could). As a least resort, it could be designated no action, if it becomes part of the proposed Buckhorn Mountains Scenic Area. Of special concern are the plants, wildlife and cultural resources of this area.

White Canyon—All Wilderness as the only good alternative because of its riparian canyon habitat, such a rare thing in the southwest, especially as this habitat affects the bald eagle and peregrin falcon and as a possible introduction site for endangered wildlife species, Gila Top Minnow, Desert Pupfish and Desert Bighorn Sheep.

Pinalco Mountains—No Action. Although the area should be preserved as a study area for the Desert Tortoise and as a possible bighorn sheep introduction site, its wilderness character is and will further be degraded by development on both sides, specifically, the highway on the east, and future GAP development on the west. If I were to hike the ridge in the future, I would not consider myself to be in a wilderness if I had to look down on the GAP cement works.

Coyote Mountains—all wilderness or enhanced wilderness to protect a true wilderness environment from the negative impact of possible mining development. Its rangeland native grassland is a vital resource to protect, both as a study area and as habitat for Marrow and Scaled quail.

Baboquiviri Peak—all wilderness, primarily because of its importance to the Papago Indian tribe. Even a better alternative would be to restore this area to the tribe, since it is the tribes' sacred mountain...but with certain conditions, such as entry, and continued use as a wilderness area.

Impact on Wilderness areas: Though I generally favor the principle of wilderness, I am aware that such designation could have adverse impacts on wilderness values, and do not favor allowing the deterioration of these areas by overuse. Wilderness must be tread upon lightly, so as not to destroy what man wishes to preserve, since it is so there for his pleasure alone, but essentially for the plant and animal life that exists there, and to preserve the nature of the land, and its historical and prehistoric habitation.

Wilderness designation, or some degree thereof, would best protect the cultural resources of these areas, as well as their scenic value and natural features. To quote from your manual, page 66, Environmental Consequences, "Not designating these WAAE wilderness would expose wilderness and related values to the risk of degradation"... wilderness values "could be lost or permanently impaired". I agree.

February 18, 1985

*Betty Jensen*

*Note: Summary, Social attitudes:*

*It is stated "local populations tend to oppose wilderness designation or to be indifferent to it." This to me, is very surprising, and somewhat startling dismissal of local opinion. In my experience, local people are either very much for, or very much against environmental matters.*

*I am responding to this study because I hike and bird watch in many of the primitive + wilderness areas of Arizona, although I am not too familiar with the areas in this study. Designation might prompt me to visit them. What else if I heard a big bird never walk in these places, I should be content to know that they are there!*

Phoenix District Office  
c/o Marilyn Jones, Phoenix District Manager  
B.L.M.  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones,

When was the last time (if ever) you encountered a bighorn sheep? The 24,000 acres in the Mt. Wilson area should be made wilderness, if for no other reason, than to protect these magnificent animals.

Sincerely,

*Tom Angenent*  
Mr. & Mrs. Thomas Angenent  
3850 N. Fanning Drive, D-2  
Flagstaff, Arizona 86001

Dear Mr. Jones,

February 17, 1985

I am very disturbed at the BLM's reluctance to include certain proposed wilderness areas. I feel the people and children of the state of Arizona and the Phoenix and Tucson areas in particular deserve some wild areas to explore. The rampant development and commercial exploitation of the areas in and surrounding these cities is disgusting.

There are several small areas that would be perfect for wilderness designation.

The White Canyon area because of its small size and moderate potential for copper production is a perfect candidate. Hello Canyon with its unusual flora and fauna and already a proposed Natural Area designation is another. With the rampant development in the area, the spectacular desert scenery, wildlife, especially the desert tortoise is on the downside. The Picacho mountains area has these things and should be included as wilderness. The BLM says Mount Wilson lacks important wilderness characteristics. How correct. Big Horn Sheep which reside in that area are not a dime a dozen anywhere. The area close proximity to Lake Mead Nat. Rec. Area and the Wilson ridge area would make a large recreation area for all sorts of outdoors people. I am encouraged by your recommendation for the Saboguinai Peak area. I feel the possibility of acquiring another 3245 acres in the area should be something you will encourage and also recommend for wilderness.

Your no wilderness recommendation on the Coyote mountains area baffles me. Here we have an area with archeological significance, protected plant species, important wildlife habitat <sup>and</sup> ~~and~~ "highly scenic" in your own words. So what if it's small! There is less conflict with range and mineral usage. This is one area that I see absolutely no reason why it should not be recommended wilderness.

Please give these areas a 2nd look. There is no reasonable reason why they all can't be wilderness for today and future generations.

Sincerely,

Ernie Sidestop  
Phoenix, ARIZONA2706 N. Silverbell Rd. #150  
Tucson, Arizona  
85745

Dear Sir:

I sincerely agree and  
 compliment you on your  
 discussion on new proposed  
 wilderness areas such as  
 Mt Wilson, Keli Canyon,  
 White Canyon, Petachos  
 and Coyote areas.

We are losing approx  
 2 million acres to wilderness  
 areas in Arizona now.

Thank you  
 R Hredy  
 Box 2243 Globe  
 425 6248 AZ

**BFL**

February 19, 1985

District Manager BLM  
 Phoenix District Office  
 2015 W. Beer Valley Road  
 Phoenix, Arizona 85027

Dear Sir,

These comments are intended for insertion in your  
 Phoenix/Cerbat Black EIS.

In the first place, I am shocked that you  
 recommended only one WSA for Wilderness designation  
 (Baboquivari). As a lifelong resident of southern  
 Arizona, I am familiar with all the areas now under  
 consideration in the above EIS. And as a hiker and  
 backpacker, I am familiar with their wilderness  
 values.

White Canyon, WSA 2-187, 6,968 acres, is especially  
 suitable for wilderness designation. BLM should acquire  
 the mineral rights. Your "moderately favorable" copper  
 potential rating is ridiculous. The days of government  
 subsidized development of low grade copper deposits are  
 over, and with them the Arizona mining industry. There  
 is no longer any need to allow the mining industry to run  
 their bulldozers over our public lands.

The same can be said for the livestock industry.

2

The areas in this EIS are already overgrazed, as are virtually all the public lands in Arizona. To illustrate: On February 16, 1985, while hiking in Walnut Canyon (south of White Canyon), I encountered 4 dead cows. Since the streams were running almost full, these animals must have starved to death. I am tired of supporting this kind of mis-management. Get the cows off of our public land!

The most justifiable use of lands such as White Canyon today are as wilderness areas which act as buffers between the growing industrialized cities of Arizona. They provide recreation of the kind more and more residents of these cities are demanding. And this is why more weight should be given to the wilderness values of areas such as White Canyon, Hell's Canyon (9,379 acres), Picacho Mountains (6400 acres), Coyote Mt. (5,080 acres WSA 2-202), and Mount Wilson (24,821 acres). I strongly advocate wilderness designation for all these units. Time, and population growth in the state will prove the wisdom of this course of action.

Sincerely,  
James E. Posedby

10011 N. Orange Ranch Rd.  
Tucson, Az. 85741  
February 15, 1985

District Manager, Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, Az. 85027

Dear Sirs,

The following are my comments pertaining to the draft EIS for the wilderness designation of the six WSA's documented in your December 1984 publication. This written statement is in lieu of an oral presentation at the January 30, 1985 public hearing conducted in Tucson, and is intended to be included as part of that hearing for the public record.

I would like to state at the outset that I am in favor of the "All Wilderness" alternatives that you proposed. The amount of private land holdings and existing ELM lands currently available for exploitation of mineral and energy resources is vastly out of proportion to the land preserved for its wilderness value. Existing human development in this country precludes ever restoring a reasonable balance between the two conflicting land uses, but this is our opportunity to preserve natural ecological systems for future generations of Americans.

Your EIS evaluation is to be faulted on a number of grounds. First, it is far too parochial in its nature. The lands being studied belong to all American people, including those that visit our state from elsewhere in the country, and those in future years that will move to Arizona to enjoy its wilderness resources. The social attitudes towards wilderness preservation of the American public in general is not addressed in your EIS.

In fact, social impacts appear to be given only a token analysis that is far from complete, or even adequate. Evaluating social attitudes is probably the single most important aspect of an EIS because it considers, at least in part, the public's feelings toward the long term goals and benefits of wilderness preservation. When analyzing social attitudes in the EIS, the authors cited several information sources, but allotted most of the written discussion to the 1982 ELM selected sample of Arizona registered voters.

Their interpretation of the survey findings appears distorted to the point of a conscious effort to bias the EIS towards non-wilderness. It is stated that "The largest category, over 50 percent of the state residents, is composed of those who are either not interested

in or not concerned about wilderness." Having thoroughly studied the published opinion survey results, I can only assume that to make the above statement, the percentage of unanswered questionnaires was factored in to other survey results to obtain that conclusion. This is a totally invalid and improper use of the data. The small "response bias check" made to evaluate these nonrespondents did not indicate that these people were "not interested in wilderness." Nevertheless, the nonrespondents were not part of the survey (other than the bias check) and if the BLM wants to draw conclusions from this group, then a new and proper survey needs to be carried out on these people, and not until then should statistics be shuffled around to suit the BLM's bias.

The survey, in fact, points to an extremely high degree of concern about the importance of wildlife, wilderness, and outdoor recreation as uses of public lands. The following statements are quoted directly and in context from the published survey.

"Eighty-one percent believe that wilderness is an important use of Arizona's federal land."

"More than eighty percent believe that the federal wilderness areas are important for protection of wildlife, plants, air and water quality, and natural lands."

"The public lands are seen as important for wildlife protection by 92 percent of respondents."

"Questionnaire data reveal that respondents strongly value existing wilderness."

"The majority of respondents agree that wilderness lands need to be protected and that wilderness is a good thing for most people in Arizona."

On page 89, in the Proposed Action section of the Impacts on social attitudes, it is stated that "groups who favor additional wilderness for Arizona would disagree with a decision to select the Proposed Action because it excludes other WSA's from wilderness recommendations." Then it says, "This disagreement is not an impact because it does not represent a change from the existing situation."

What kind of reasoning is this? If you mean that the Proposed Action does not represent a change from the existing situation, that is not true. The EIS states itself on page 91 that "The protection of the wilderness resource, plants, scenic, and cultural values, and wildlife habitats could decline in the short and long term." If you mean that groups who favor additional wilderness for Arizona do not represent a change from the existing situation, then this statement is ridiculous. Are you to completely ignore the social attitudes of

those of us who favor additional Arizona wilderness just because we have been committed to this goal in the past?

Whatever your intentions are in these statements, it is nonetheless political "doublepeak" and is an indication of the BLM's attempt to present a biased EIS in favor of the commodity producing companies while not adequately addressing the public's attitudes and concerns for wilderness preservation. The BLM is underwriting the American people's mandate through Congress of the Federal Land Policy and Management Act which made wilderness preservation a valid resource in multiple use planning.

Another major deficiency in the EIS is the narrowness of your subjective views on the value of the WSA's in regards to the quality of the wilderness experience that can be obtained in these areas. In each WSA evaluation, it is stated that solitude opportunities will diminish by more visitors coming to the areas if they were designated as wilderness. This may be true, but so will solitude opportunities diminish to an even greater degree if the areas are mined, or if not enough wilderness areas exist to accommodate the people with those recreational interests. You present a meaningless "catch-22" argument.

In addition, the WSA's are criticized for being too small or too close to developed visual intrusions to be of value for designating as wilderness. This, too, makes no sense. The BLM takes a negative attitude as to the value of wilderness adjacent to human developments, and by this reasoning, as more and more development occurred on unprotected land, more and more potential wilderness would be removed from consideration until no potential wilderness areas existed. Rather, the fact that the WSA's are small or nearby developments makes it all the more important that the development is prevented from spreading across even wider land areas, and that the smaller patches of wilderness remain to establish the true and natural character of the local environments.

I feel that the BLM recommendation represents a serious disregard of the value of wilderness as a resource in relation to business exploitation commodity development interests. "B" confidence levels in evaluating mineral extraction potential, and communication facilities to aid the Tucson/Phoenix I-10 transportation corridor, for instance, are not significant enough to have any weight in relation to the benefits of preserving our country's environmental heritage. The BLM's determination of good photographic opportunities or of hiking being good because of challenges by steep cliffs may be true, but is a narrow view and ignores the fact that wilderness is a resource that should exist for its own sake. Even looking at the pristine Picacho Mountains from a car traveling on I-10 can bring an enormous feeling of satisfaction to an enormous number of people.

In conclusion, I do not believe that thousands of acres of land

# ARIZONA DESERT BIGHORN SHEEP SOCIETY INC.

P. O. Box 5241 • Phoenix, Arizona 85010

February 20, 1985

should be designated as wilderness to be used just as a playground for a relatively few outdoor enthusiasts at the expense of the mining and energy resources. Instead, to quote from the Wilderness Management Policy itself, "Wilderness areas are those open to use and provide a variety of benefits to society. Use might be "on-site," taking direct advantage of the multiple resources of the area. Or the use and benefits may be derived "off-site," such as through enjoyment of the scenery at a distance from a nearby highway, through indirect benefits from the area's resource (i.e., water quality, wildlife, etc.) or just the knowledge that the area exists."

The tiny bit of land under consideration here will at least provide a small opportunity to preserve a part of the world that we are so inexorably tied to.

Sincerely,

John V. Pluth

Mr. Marilyn V. Jones  
Phoenix District Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Marilyn:

Please accept the following remarks of the Arizona Desert Bighorn Sheep Society, Inc. in response to the draft environmental impact statement for the wilderness designation of wilderness study areas located in the Phoenix District. Of all the WSAs addressed in the EIS it is the Mount Wilson WSA (2-01A) which is of particular interest to the Society because that area contains one of the state's best desert bighorn sheep populations.

The ADBSS supports designating Mt. Wilson's 24,821 acres as wilderness. Supporting the designation of the Mt. Wilson WSA as a wildlife management area for the protection of desert bighorn sheep, under the protection prescribed by the Carbet Mountain WSA, was a tempting alternative since wilderness areas are legislatively mandated by Congress the Society feels the Mt. Wilson area would be more secure via a Congressional legislative mandate than by the Bureau's administrative imposition of a wildlife management area.

The Society has two main concerns with the designation of Mt. Wilson as a wilderness area. These are hunter access and spaces for construction and/or maintenance of bighorn sheep watering facilities.

Mt. Wilson is located in game management unit 15-B WEST. In the past five years this unit has accounted for a yearly average of 15.6% of all desert bighorn sheep permits issued in the state. Neither the Interim Management Policy nor the Wilderness Management Policy provide for motor vehicle use by hunters. The draft EIS states only about 4.25 miles of rugged vehicle ways are found within the Mt. Wilson WSA. The ADBSS requests language be written into the appropriate legislation authorizing a Mt. Wilson Wilderness Area which would "overrystem" the 4.25 miles of vehicle ways within the Mt. Wilson Area and leave them open for hunter access.

The Society has, since its inception, devoted a major portion of its efforts and manpower to construction of desert bighorn sheep watering facilities. This effort continues to be near and dear to our hearts. We are concerned with the effect wilderness designation would have on the ability of agencies and organizations to construct new and maintain existing desert bighorn watering facilities. A review of both the Interim Management Policy and Wilderness

Mr. Marilyn V. Jones  
February 20, 1985  
Page 2.

Management Policy has assuaged fears of no new construction and cessation of maintenance on existing projects. We were also pleased to see the use of helicopters and portable hand power tools is permitted when adherence to specific guidelines is observed. The Society feels use of helicopters and portable hand power tools is important in the new construction and continued maintenance of desert bighorn sheep waters in a Mt. Wilson Wilderness Area and supports their use when the need is identified on a case by case basis.

In summary, the Arizona Desert Bighorn Sheep Society, Inc.:

- 1.) supports designation of Mt. Wilson's (2-01A) 24,821 acres as a wilderness area;
- 34-1 2.) requests language be written into the appropriate legislation authorizing a Mt. Wilson Wilderness Area which would "cherry-pick" the 4.25 miles of vehicle ways within the area to leave them open for hunter access,
- 34-2 3.) supports the use of helicopters and portable hand power tools in new construction and continued maintenance of desert bighorn sheep waters within a Mt. Wilson Wilderness Area when the need is identified on a case by case basis;
- 34-3 4.) supports new construction and continued maintenance of desert bighorn sheep waters when the need is identified.

Thank you for the opportunity to comment.

Sincerely,



Stephen M. Williams, Chairman  
Legislative Committee

SMW:gw

- 34-1 Travel within a BLM administered wilderness will normally be by nonmotorized, nonmechanical means consistent with the preservation of wilderness character. Hunters will not be allowed motorized access.
- 34-2 The wilderness management plan will specify the instances and places in which use of aircraft is the minimum necessary to administer the wilderness resource or is necessary as part of a nonconforming but accepted use. State Director approval is required.
- Power hand-portable tools, such as chain saws or rock drills, may be approved by the State Director when they are the minimum necessary for administrative purposes where work cannot be accomplished with nonpowered tools. Use of such tools will be addressed in the wilderness management plan.
- 34-3 The maintenance of existing projects and the construction of new projects within a designated wilderness area will have to be evaluated and approved on a case by evaluated and approved on a case-by-case basis.



35

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RECEIVED

BLM, PHOENIX DIST. OFF.

PHOENIX, ARIZONA

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## DESERT BIGHORN COUNCIL

 Established to promote the advancement of knowledge concerning the Desert  
 Bighorn Sheep and the long-range welfare of these animals.

 P.O. Box 1383  
 Loomis, CA 95650

20 February 1985

February 23, 1985

 Mr. Marilyn V. Jones, District Manager  
 Bureau of Land Management  
 Phoenix District Office  
 2015 W. Deer Valley Road  
 Phoenix, AZ 85027

 Mr. Marilyn V. Jones, District Manager  
 Bureau of Land Management  
 Phoenix District Office  
 2015 W. Deer Valley Road  
 Phoenix, Arizona 85027

 RE: The Phoenix Draft Wilderness  
 Environmental Impact Statement

Dear Mr. Jones:

Dear Mr. Jones,

 The Desert Bighorn Council has reviewed the Phoenix Draft  
 Wilderness Environmental Impact Statement. Since the  
 Council considers only the effects of proposed actions  
 on desert bighorn sheep or their habitat, our comments  
 will be limited only to the Mount Wilson WSA (2-01).

 I am writing to strongly urge wilderness designation for the Mount Wilson,  
 Picacho Mountains, Coyote Mountains, and Baboquivari Wilderness study areas.  
 Wilderness designation for these areas would provide great ecological and  
 recreational benefits without causing any significant negative economic effects.

 While we support the lack of designation of the Mount  
 Wilson WSA as described under the Proposed Action, the  
 Council does not support the Proposed Action itself.  
 Instead, we support the No Action alternative for Mount  
 Wilson as described on page 9 of the DWEIS: managing the  
 area under the directions prescribed in the Cerbat Mountains  
 Management Framework Plan. Designation of Mount Wilson  
 as part of a wildlife management area for desert bighorns;  
 restricting ORV use to existing roads, trails, and washes;  
 eliminating livestock grazing; allowing no communications  
 sites on Wilson Ridge; and a case-by-case review of all  
 mineral permits and leases, will do more to benefit  
 desert bighorns and their habitat than any of the other  
 alternatives presented in the DWEIS, including the Proposed  
 Action.

 Mount Wilson WSA: Wilderness designation for this WSA, which is bounded  
 on three sides by the Lake Mead National Recreation Area, would protect 24,800  
 acres of crucial bighorn sheep habitat as well as habitat for six other special-  
 status wildlife species and five protected plant species. The Mount Wilson  
 Wilderness combined with the adjacent Park Service lands would provide greatly  
 enhanced range security for the desert bighorns and magnificent backcountry  
 recreation for visitors.

 Picacho Mountains WSA: This beautiful range should unquestionably be  
 protected as a wilderness area. This WSA is a scenic treasure, impressive  
 from 1-10 and even prominent from buildings in downtown Tucson. Furthermore,  
 the entire WSA is crucial desert tortoise habitat. Its easy accessibility  
 from both Phoenix and Tucson guarantees that the wilderness area would be a  
 tremendously popular and valuable hiking and sight-seeing area, as has been  
 amply demonstrated by nearby Picacho Peak State Park, which is blitzed by  
 visitors every spring. In view of this tremendous potential, the BLM's plan  
 to deny this WSA wilderness status to allow communications equipment on the  
 ridge would be a tragic waste of a tremendous environmental resource. The  
 fact that the CAP aqueduct and 1-10 would be visible from the wilderness area  
 would detract slightly from the scenery, but that is an inevitable consequence  
 of the area's accessibility. In any case, release of the WSA to development  
 would eliminate the area's recreational potential, destroy its scenic beauty,  
 and gradually eliminate the tortoise habitat. Clearly, wilderness designation  
 for this WSA is vastly preferable.

 We thank you for the opportunity to comment on this DWEIS.  
 If you have any questions, please contact me.

Sincerely,

 Richard A. Weaver  
 Chairman  
 DBC Technical Staff

 Coyote Mountains: The BLM's recommendation against wilderness status for  
 this WSA is based on their claim that its small size (5,000 acres) "lessens  
 the wilderness caliber of the WSA's solitude and primitive recreation oppor-  
 tunities." That is completely wrong. The WSA is half-surrounded by the

ALVIN W. GERHARDT  
816 AGAVE BLV.  
GLOBE, ARIZ.  
85501

Alvin W. Gerhardt  
816 Agave Blv.,  
Globe, Ariz. 85501  
Feb. 23, 1985

Marilyn Jones  
Phoenix District Mgr.,  
Bureau of Land Management,  
2015 West Deer Valley Road,  
Phoenix, Ariz. 85027  
Dear Marilyn

I agree with the recommendation that  
the following areas should not be  
designated as wilderness areas closed  
to mining.

Mt. Wilson  
Hells Canyon  
White Canyon  
Picacho Mts.  
Coyote Mt.

The recommendations made <sup>were</sup> well thought  
out and should not be changed

Sincerely,  
Alvin W. Gerhardt

Papago Reservation and immediately adjacent to Kitt Peak National Observatory. The adjacent areas to the west, including the other half of the Coyote Mountains, are therefore in a wilderness state and the entire area provides outstanding opportunities for solitude, hiking, and rock climbing. Furthermore (p.50), "The WSA and surrounding habitat contain the largest known population of desert tortoises in the state." In view of the overwhelming arguments in favor of wilderness status and the complete absence of any reasons for denying status, the BLM should certainly recommend the Coyote Mountains WSA for designation as a wilderness area.

Baboquivari WSA: The WSA should indeed be designated wilderness, as the BLM proposes, and the area should be expended if possible via acquisition of adjacent lands.

Thank you for your time.

Sincerely,



Dr. Paul Hintzen  
5750 Camino Esplendor #237  
Tucson, Arizona 85718

36-1

The effect of wilderness designation or nondesignation on desert tortoise habitat in the Picacho Mountains WSA is not considered an issue because only a small amount of the WSA's total habitat is expected to be disturbed under nondesignation.

Arizona  
Bureau of Geology and Mineral Technology

Geological Survey Branch  
845 N. Park Ave., Tucson, Arizona 85719  
(602) 621-7505



ARIZONA DEPARTMENT OF TRANSPORTATION

HIGHWAYS DIVISION

208 South Seventeenth Avenue Phoenix, Arizona 85027

BRUCE BABBITT  
Governor  
WILLIAM A. ORINAY  
Director

February 25, 1985

CHARLES L. MILLER  
State Engineer

February 26, 1985

Mr. Marilyn V. Jones  
District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones:

I have reviewed the Draft Phoenix Wilderness Environmental Impact Statement. Description of known and potential mineral and energy resources within the Wilderness Study Areas is consistent with present knowledge of the local and regional geologic framework. Fred Potter's description of "Impacts on Minerals and Energy" (p. 74-75) is quite realistic.

Sincerely,

*Larry D. Fellous*  
Larry D. Fellous  
State Geologist and  
Assistant Director

LDF:ms  
LDF:ms

Mr. Marilyn V. Jones, District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Re: Phoenix Draft Wilderness  
Environmental Impact Statement

Dear Mr. Jones:

Thank you for the opportunity to review and comment on the Phoenix Draft Wilderness Environmental Impact Statement. The six Wilderness Study Areas in the EIS are sufficiently removed from existing highway corridors so as to not affect Arizona Department of Transportation maintenance activities, possible minor realignments, roadway widening, or locating materials sources.

The EIS preferred alternative, designation of WSA 2-2038, Baboquivari Peak, and returning the remaining five WSA's to other multiple use management is supported by ADOT.

Very truly yours,

*Phillip A. Sbricci*  
PHILLIP A. SBRICT, Manager  
Environmental Planning Services

FAS:MRD:eh



## YUMA AUDUBON SOCIETY

P.O. BOX 226  
YUMA, ARIZONA 85364

February 23, 1985

Harlyn Jones, District Manager  
Phoenix District Office  
U.S. Bureau of Land Management  
2815 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Mr. Jones:

The following are Yuma Audubon's comments on the Phoenix Draft Wilderness Environmental Impact Statement of December 1984.

In brief, we support the All Wilderness Alternative for the reasons mentioned below. Each WSA is worthy of wilderness designation.

## MOUNT WILSON WSA

We support wilderness designation for this WSA because it presents opportunities for outstanding solitude and high quality primitive recreation. It is surrounded on three sides by the Lake Mead National Recreation Area, where contiguous areas have been proposed for wilderness also. Any wilderness area from which one could see the Grand Canyon automatically provides a breathtaking experience. Moreover, there are few mining claims and leases and only low to moderate mineral potential. Surely there are areas of greater potential that could be used for mining. BLM admits that there are no current or anticipated uses for this WSA that would prevent managing it as wilderness. This WSA also provides crucial habitat for Desert Bighorn Sheep which are valued by sightseers, students of nature, lovers of nature, and hunters alike.

## HELLS CANYON WSA

This WSA not only would provide a sense of solitude from the canyon from which it takes its name, but also has high habitat values. It is crucial habitat for open chaparral, and contains junipers growing side-by-side with sagueros. Even the MFP for this area proposed closing the Cedar Basin to mineral entry, but this EIS would not even do that. Moreover, there is an important archaeological site and Gilbert's Sink is present. We believe that wilderness designation would best protect the high resource values of this WSA. We would like to know in specific terms how BLM proposes to protect the resources mentioned above from degradation if Hells Canyon is not proposed for wilderness, as this is not addressed in the EIS.

## WHITE CANYON WSA

This is an outstanding area for wilderness, providing a great variety of primitive recreation experiences. The landscape itself is dramatic and varied, with an elevation range of over 2000 feet, cliffs, and colorful, layered rocks. Moreover, there are abundant cultural and biological resources, especially 50 acres of riparian vegetation (along with two other life zones). There is only moderate to low mineral potential and no oil and gas lease revenue would be lost by proposing this WSA for wilderness. We feel that wilderness designation would best provide overall protection for the sensitive resources of this WSA. Nowhere in the EIS does BLM discuss specifically how the riparian habitat (and its associated animal life) nor the cultural resources, which cover the entire WSA, would be protected from degradation, if it were not designated wilderness.

## PICACHO MOUNTAINS WSA

This WSA should be proposed for wilderness because of its physical challenge to the hiker as well as its outstanding scenic views and vegetation. BLM states that this area is manageable as wilderness, and the MFP for the Picacho Mountains recommended that they be designated a primitive area to protect, in effect, wilderness values.

The EIS recommends against wilderness designation because of purported distractions from a wilderness experience because of noise from I-10 and visibility of human constructions, such as the GAP canal, all of which are outside the WSA. However, one could also argue that to the extent that one notices these features of human activity outside the WSA, the feeling of wilderness within the WSA is heightened—one can look out on human activity from the solitude of a wilderness and thereby gain a feeling of getting away from such activity. Besides, such human activity or artifacts would not be apparent from much of the WSA. Moreover, the WSA should also be evaluated from the outside looking in—wilderness designation would protect these mountains from scarring and projections (such as communications sites) that would detract from scenic values for travelers along I-10. The commercial overdevelopment at the foot of Picacho Peak is an excellent example of what should not be allowed to happen to a high quality scenic landmark. The Picacho Mountains could be spared this type of development by wilderness designation.

There is only a moderate to low potential for minerals in the WSA, and only two mining claims and two mineral leases.

Wildlife values are also high in this WSA—specifically, eight special status species, including large numbers of Desert Tortoises. The factors affecting Desert Tortoise population dynamics in Arizona are still poorly known, and areas of concentration of these reptiles need to be protected and

researched for the reasons for high densities.

This EIS also does not mention that the Picacho Mountains are or at least formerly were habitat for the Organpipe Cactus (*Cereus thurberi* Engelmann). Nichol mentions this species occurring there, according to Luman Benson (The Cacti of the United States and Canada, Stanford, CA: Stanford University Press, 1982, p. 575).

In short, wilderness designation would protect this unique concentration of resources best, while mineral potential seems no greater than many other areas that are not WSAs.

#### COYOTE MOUNTAINS WSA

This WSA is already used for primitive recreation and wilderness designation would protect this use. It has a relatively high elevation for southern Arizona (8530 feet), is rugged with a large canyon, and has varied habitats including oak woodland (a critical habitat) and desert shrub riparian. There would be no lost oil and gas revenue if this area were designated wilderness. The Classic Hohokam compound also needs protection.

If this WSA were not proposed for wilderness, how would BLM specifically protect the habitat and cultural resource values in this WSA? This is not addressed in the EIS.

#### BABOQUIVARI PEAK WSA

For this WSA, we are pleased to agree with BLM that it should be designated wilderness. Its unique rock-climbing opportunities and sheer beauty recommend it to those who enjoy the outdoors, especially a physical challenge. The sacredness of this area to the Papago Indians would be better protected by wilderness than multiple use management. The vegetation is varied and unusual for Arizona, and there would be no lost oil and gas revenue by designating this area wilderness.

#### GENERAL COMMENTS

We also support the All Wilderness Alternative because the benefits of resource protection clearly outweigh any losses to other uses. All Wilderness would have little impact on grazing—only 1763 a.u.m. would be affected. Only 17 miles of vehicle ways would be closed. There would be no significant economic impacts except possibly (not certainly) White Canyon. On the other hand, eight wildlife habitats would greatly benefit (six of them crucial habitats), and recreation would greatly benefit from wilderness designation of these high quality WSAs.

An issue which needs to be addressed is that if the Proposed Action is implemented, how would resource degradation to critical habitats, threatened, endangered, and sensitive species of plants and animals, and cultural resources be prevented? It

appears that the MFP prescriptions for the WSAs not recommended for wilderness by BLM will not be implemented under the Proposed Action. While the EIS refers in a general way to laws and regulations nowhere is prevention of degradation or even mitigation addressed as specific actions for these specific areas.

Thank you for the opportunity to comment on this EIS.

Sincerely,

*Cary W. Meister*  
Cary W. Meister  
President

41

March 2, 1985

District Manager, BLM  
Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, Arizona 85027

Dear Marilyn V. Jones,

I'd like to compliment the drafters of the environmental impact statement on the apparent thorough job that was done in presenting information on the 6 WSA's (Mount Wilson, Sells Canyon, White Canyon, Picacho Mountains, Coyote Mountains and Baboquivari Peak).

After careful consideration of the Draft Wilderness Environmental Impact Statement I've concluded that all six WSA's should be designated wilderness.

It's obvious to me that wilderness designation would benefit the majority of present day humans (hikers, backpackers, rock climbers, sightseers, wildlife observers, photographers, hunters, etc.), plants (some 20 protected plant species), wildlife (some 23 special status animal species), cultural resources, the natural environment (air and water quality, valuable riparian habitat) and future generations. On the other hand non-wilderness

designation would benefit a select few (miners, road builders and ORV enthusiasts) with detrimental affects to most all other considerations.

As I see it, the only serious, potential managerial problem with wilderness designation would be with existing mining claims proven to have a valid discovery as of the date of wilderness designation. This potential problem could probably be alleviated by speeding up the process for designation and/or by land exchange.

Please don't allow the short term monetary gain of a few to be the determining factor in wilderness or non-wilderness designation of those six WSA's.

APR 11 1985  
BLM

Thank you!  
Bruce K. Thompson



Mr. Bruce K. Thompson  
4131 North 23rd Drive  
Phoenix, AZ 85015

42



**Department of Energy**  
 Western Area Power Administration  
 Boulder City Area Office  
 P.O. Box 200  
 Boulder City, NV 89005

MAR 1 1985

Refer To: 61010  
 5440-BLM WLD AZ

District Manager  
 Bureau of Land Management  
 Phoenix District Office  
 2015 W. Deer Valley Road  
 Phoenix, Arizona 85027

Dear Sir:

We appreciate the opportunity to review the draft Phoenix Wilderness Environmental Impact Statement. Western's directive to meet public demand for federal power using federal transmission lines will be provided by BLM establishing utility corridors. We support the proposed action of not designating the Mount Wilson, Hells Canyon, White Canyon, Picacho Mountains, and Coyote Mountains MSA's and releasing them from the wilderness review process. These five MSA's would return to other multiple use management.

Western is especially supportive of releasing Picacho Mountains from wilderness status. We consider Newman Peak to be essential to communications to serve 10 Western Area Power substations and to provide links with our White Tank Mountain and Mount Lemmon communication sites. In addition, the site is planned for communication support for the Central Arizona Project (CAP) water delivery facilities for Indian reservations and for the Tucson area. Western can also support the no wilderness alternative.

Sincerely,

G. J. Giles  
 Assistant Area Manager  
 for Management Services

RECEIVED  
 MAR 1 1985

43



DEPARTMENT OF HEALTH &amp; HUMAN SERVICES

Public Health Service

Centers for Disease Control  
 Atlanta GA 30333

March 1, 1985

Marlyn V. Jones, District Manager  
 Bureau of Land Management  
 Phoenix District Office  
 2015 West Deer Valley Road  
 Phoenix, Arizona 85027

Dear Ms. Jones:

Thank you for sending us a copy of the Draft Environmental Impact Statement (EIS) for the Proposed Wilderness Program for the Phoenix Wilderness EIS Area. We are responding on behalf of the U.S. Public Health Service.

We have reviewed this material for potential human health effects and have no comments to offer at this time.

Thank you for the opportunity to review this Draft EIS. Please send us a copy of the final statement when it becomes available.

Sincerely yours,

Stephen Margolis, Ph.D.  
 Chief, Environmental Affairs Group  
 Environmental Health Services Division  
 Center for Environmental Health

RECEIVED  
 MAR 1 1985

RECEIVED

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## Wildlife Management Institute

Dedicated to Wildlife Since 1911  
 Bureau of Land Management  
 Suite 725, 1101 14th Street, N.W.  
 Washington, D.C. 20005  
 202/371-1868

February 25, 1985

Dear Sir or Madam:

I believe that it is very important to preserve lands in Arizona in a pristine condition. This is especially true as so much of our state is taken over by development and an increasing population. To this end, I request Wilderness designation for all 6 areas in your Draft E.I.S., plus the "Rugged Top" unit previously dropped.

Sincerely,  
 William A. Fawcett

District Manager  
 Bureau of Land Management  
 Phoenix District Office  
 2015 W. Deer Valley Rd.  
 Phoenix, Arizona 85027

Dear Sir:

The Wildlife Management Institute is pleased to comment on PHOENIX DRAFT WILDERNESS ENVIRONMENTAL IMPACT STATEMENT, Arizona.

We support the All Wilderness or the Enhanced Wilderness alternatives, in that order. The preferred alternative, which would classify only 2,065 acres as wilderness, is not acceptable. The desert mountains of central Arizona are a national treasure and should be treated as such. To classify only 3.8 percent of the potential wilderness as suitable is unthinkable, especially in a state with Arizona's tourist traffic:

There are three reasons for supporting All Wilderness.

Page 84 - Wilderness will not harm existing grazing rights.

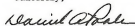
Page 78 - Wilderness will benefit wildlife habitat.

Page 90 - There is not enough knowledge to assess the impacts of wilderness on mineral development.

The reasons for non-classification are inconsequential. Most could be solved by imaginative land management and enhancement.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,



Daniel A. Poole  
 President

DAP:sh





## THE UNIVERSITY OF ARIZONA

TUCSON, ARIZONA 85721

602/621-6970

LUNAR AND PLANETARY LABORATORY

February 25, 1985

Marlyn Jones  
Phoenix District Manager, B.L.M.  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones:

This letter is in support of wilderness status for all six of the Wilderness Study Areas in your Environmental Impact Statement, plus the "Ragged Top" unit which was dropped from consideration in 1982.

Our family has hiked most of the areas under consideration, climbed Baboquivari Peak several times and camped on top of Picacho.

We ask you to do your best to preserve in the strictest wilderness sense all 6,968 acres of White Canyon, 9,379 acres of Hell's Canyon, 6,400 acres of the Picacho Mountains, 24,821 acres of Mt. Wilson, the Coyote Mountains and Baboquivari Peak including the 3,245 acres of state land to enlarge the size of this small unit.

It is of the greatest importance to preserve these areas for the future of our children, their children, and so forth.

Thank you for your consideration and help.

Sincerely yours,

*Tom Gehrels*  
Tom Gehrels  
Professor

TG/em

5825 W. Monte Cristo  
Glendale, AZ 85306  
March 2, 1985

Dear District Manager:

I am writing to express my support for wilderness designation of the six W.S.A.'s included in the Environmental Impact statement because they are good examples of Arizona's unique and ruggedly beautiful wild desert lands. As I was hiking in the desert this morning I was strongly aware of how such rarer such areas are becoming - and of how very valuable.

Thank you for your attention.

Sincerely,

*Bettina Blokel*

Bettina Blokel

Mr. Bo McClure, Dist. Mgr.  
Phoenix Dist. Office, BLM  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

March 4th, 1985

Ref: Proposed Wilderness-WSAs

Dear Mr. McClure,

This letter is to express comment relating to any present or future WSAs, and outlining the reason for comment. I attended the Tucson meeting to find out if my "enough wilderness" thinking was out of phase, so to speak. After listening to the various speakers and taking notes on their subject matter, I am more convinced than ever, that additional wilderness designations will not benefit either the Gov't or its citizens, but rather, only a special interest group. Therefore, I ask the BLM to please not recommend additional acreage into wilderness designation, for the following reasons.

(1) **Public use.** When an area is designated wilderness, it is withdrawn virtually forever from use by the general public. Unless one is young, vigorous and able, to climb miles into a mountainous range, it could not be seen, heard or appreciated. It is commendable of an environmental group to want to preserve areas of beauty, but who, other than a very few, can partake of this beauty, without vehicles to use to get within easy reach. It would require hiking stamina, backpacking abilities, and perhaps the rigors of overnight camping to access many such locked away areas. Many of us, when young and able, had not the time or means to enjoy our land. Later, when these were acquired, we have lost the youth and vigor to make the difficult trek. Prohibiting vehicular use for near access, prevents us from enjoying this beauty.

(2) **Wildlife.** The comment was made that wilderness was needed to preserve the birds and wildlife. Perhaps in a special situation it might be so, but unless a habitat is destroyed, which can happen even by natural means, most birds and wildlife can and do, cohabit with limited exposure to man. Excepting, of course, well developed areas such as cities and farming areas. Certainly the mountains and canyons will not be fenced or ceded under BLM management. Additionally, BLM impoundments, tanks, watershed controls and etc., invariably enhance the prospects for wildlife. Man's presence can be good.

(3) **Resources.** It seems a geological and natural fact that nearly all of the available resources of the west are in mountainous areas. The desert floor offers little in the way of natural resources. Each such resource area removed from general use, further restricts the availability of both known and unknown resources, thereby perhaps overtaxing the remaining open areas. We may have an abundance of some resources in unrestricted areas at present, however withdrawing of an area immediately stops all investigating, exploring and inventory of whatever could

be present. There may well be resources not yet discovered or identified, that could be of critical need in future years. Case in point, Atomic Energy, which has happened in my lifetime. Before atomic energy, who needed or knew that uranium could be so important as to win a major war? Can we say that no similar discovery is not just around the corner? At present, certain vital minerals have to be imported because of scarcity in the U.S.. Can we say that a deposit of such a mineral could not soon be discovered in a WSA. Likely not unless each has been very thoroughly explored using the latest modern techniques.

(4) **Greatest good.** One gentleman stated the greatest good comes if all WSAs become wilderness. I emphatically disagree! The greatest good comes when people of all classes or styles can benefit from the use of an area. By restricting use to surface only by a limited few, it would seem the gentleman spoke "with forked tongue", from a very selfish point of view. Think how our country would be today if his philosophy had prevailed only 100 years ago. We would not be as great as we are today. There would be little forest industry, little ranching, little mining and very few roads off the main path. Yes, we would have lots of undisturbed forest and wildlife, but how would we know about it unless by special Gov't report. Most would not have seen any part of it because of only roads being dozens of miles distant. Even being young and vigorous, how many would walk or bicycle along long miles across the desert, just getting to the base of a mountain range. We can thank the multiple use concept of management for the roads and trails that take us nearer the seal accessible scenic wonders of nature, without which, most of the wildernesses and WSAs would be about as accessible to the general public as the Alaskan tundra.

(5) **Control.** Any area, wilderness or not, is best administered under reasonable controls, which might differ from area to area. Certainly no area, however mundane its top or habitat, should be wantonly destroyed or disfigured, without good cause. No area should have its ground water polluted or habitat destroyed to the extent of elimination of a species. Few will argue against controls preventing such abuse. However, control as we might, all change and destruction can not be prevented. Earthquakes, erosion, Mt. St. Helens, forest fire and so forth, are beyond the control of man. Natural processes are forever changing the face of the land, so let us manage and utilize our present resources and recreational assets, for tomorrow they may be changed or lost forever. Let us use them for the good of all, as the need dictates, rather than hide them from all but a select few.

(6) **Solitude.** A worthy seeking, but how many wish it for more than a brief period? If one wanted solitude for long periods, they would move to desolate areas and live off the land. (probably go bananas shortly) For a selfish few to ask that thousands and thousands of acres be set aside and restricted to their type use only, is parallel to asking to have ones cake and eating it also. Should solitude even be a factor in

areas of less than 10,000 acres? Small acreage like Baboquivari (only 100 acres) and modest acreages like White Mt., Picacho Mt. and Coyote Mt. because of size, configuration and other interests, do not lend themselves well to a wilderness, let alone a solitude type thing.

In summary, the multiple use concept of any and all BLM administered lands, is not only a charge of the BLM, but certainly makes good common sense as a way of getting the most and best use of public lands, for the greatest number of citizens. Control the use where necessary to protect the overall integrity of such lands, with special consideration given to an environmentally sensitive area, but please do not recommend any further withdrawals of public domain from general use.

Eliminating the fisherman, hunter, rancher, prospector, rock-hounds, forrester, vehicular sight-seers and so forth, by wilderness designation, would effectively reduce the use of such areas by a goodly segment of the population. I do not wish for pollution and degradation by by careless uncontrolled use, but neither do I wish to be excluded because of age, ability or talent, from enjoying the wonder of our land and its bounty.

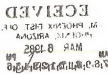
Sincerely,

*James Heeringa*  
James Heeringa #25  
4233 N. Plowing Wells  
Tucson, Arizona 85705

151

*Att.*

*Mr Marilyn*



*Dear Sir.*

*I am writing in regards to the Mount Wilson area being made into a Wilderness area.*

*I have been into the area many times and I don't feel it would be suitable for such.*

*Sincerely*

*Don Tweedell*  
841 E. Cambridge  
PHX ARIZ 85006

50

RECEIVED  
 MAR 6 1982  
 PHOENIX DIST. OFF.  
 PHOENIX, ARIZONA

MR. MARLYN JONES  
 PHX. DISTRICT MGR.  
 2015 W DEER VALLEY RD  
 PHOENIX AZ.

DEAR SIR;

"IN REGARD TO MAKING THE  
 PICACHO MOUNTAINS INTO A  
 WILDERNESS AREA"

I HAVE HUNTED & PROSPECTED IN  
 THIS AREA OVER A PERIOD OF  
 SEVERAL YEARS & [I DO NOT BELIEVE  
 THIS AREA QUALIFYS AS  
 A WILDERNESS AREA]  
 & URGE YOU TO KEEP THIS AREA  
 OPEN FOR CONTINUED  
 MULTIPLE USE.

THANK YOU

V.B. JONES  
 1107 DRIFTWOOD  
 PHOENIX ARIZ. (85547)

152

51

RECEIVED  
 MAR 6 1982  
 PHOENIX DIST. OFF.  
 PHOENIX, ARIZONA

Mr Marlyn Jones  
 Phoenix Dist Manager  
 BLM  
 2015 W. Deer Valley Rd  
 Phoenix, Ariz. 85027

Re: Picachos mountains

Dear Sir:

I agree with your recommendations.  
 I have Camped and dinned over  
 this area for many years.  
 Thank you for showing  
 some sanity.

Sincerely  
 Frances O. Allingworth  
 PO Box 49  
 Pine, Ariz 85544

52

Feb 21 1985  
Tonto Basin, AzRECEIVED  
BLM, PHOENIX DIST. OFF.  
PHOENIX, ARIZONA  
MAR 8 1985

Marlin Jones

Phoenix District Manager

BLM

2015 West Deer Valley Rd  
Phoenix, Az 85027

Dear Mr Jones

Regarding the Proposed inclusion of Hells Canyon area in the Wilderness area, I am very much opposed to the inclusion of such an area where valuable multiple uses are suddenly terminated by the whims of a dedicated few. (Sierra Club)

Please cast my vote against any more wilderness Areas

Michael R Thompson  
Box 234  
Tonto Basin Az 85658

53

Feb 20, 1985  
Tonto Basin, AzRECEIVED  
BLM, PHOENIX DIST. OFF.  
PHOENIX, ARIZONA  
MAR 8 1985

Marlyn Jones  
PHOENIX DISTRICT MANAGER  
BLM  
2015 WEST DEER VALLEY RD  
PHOENIX, AZ  
85027

Dear Mr Jones

In regard to the WHITE CANYON proposed wilderness area. I have traversed this area for years and feel it would be a shame to close off this area to make it a wilderness area.

I would like to know what I can as a Taxpayer and citizen do to prevent this from happening.

I await your reply

Thank you,

Susan Thompson  
Box 234  
Tonto Basin, Az  
85658

54

RECEIVED  
 PHOENIX DIST. OFF.  
 MAR 8 1985  
 PHOENIX, ARIZONA

MR. MARLYN JONES  
 PHX. DIST. MGR.

BLM

2015 W. DEER VALLEY RD  
 PHX. AZ 85027

RE. MOUNT WILSON WILDERNESS AREA  
 PROPOSAL BY SIERRA CLUB THIS IS  
 REDICULOUS I HAVE PROSPECTED & HUNTED  
 CAMPED AND DRIVEN ALL OVER THIS  
 AREA FOR THE PAST 50 YRS OR SO  
 TO CALL THIS A WILDERNESS IS  
 NUTS AND MERELY ANOTHER LAND  
 GRAB FOR THE FEDERAL GOVT, AND  
 OTHER SOCIALIST ORIENTED GROUPS  
 PLEASE USE MY LETTER ANYWAY  
 THAT WILL BENEFIT OUR STAND

YOURS TRULY

William F. Albright  
 P.O. BOX 49 PINE AZ,

55

February 20, 1985

Randi Shumway  
 P.O. Box 2206  
 Payson, Arizona 85547

RECEIVED  
 PHOENIX DIST. OFF.  
 MAR 8 1985  
 PHOENIX, ARIZONA

Mr. Frank Jones  
 Phoenix District Manager  
 Bureau of Land Management  
 2015 W. Deer Valley Road  
 Phoenix, Arizona 85027

RE: White Canyon

Dear Mr. Jones:

This is to rene (my support of a proposal that this area should not be withdrawn for wilderness.

The present multiple-use management is very adequate for the maximum benefit of the people of this country. In wilderness areas, revenue from taxes, money saved from mining and other fire trade is lost. The enjoyment of the country for hunting, hiking, etc. is lost. Looking this area up from mineral development is a devastating action.

Please continue your effort to block the wilderness withdrawal

Randi Shumway

56

57

Feb. 20, 1985

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 FEB 20 1985  
 PHOENIX, ARIZONA  
 MAIL ROOM  
 85504

my Marla Jay Jones  
 My District Manager  
 BLM  
 2015 W. Deer Valley Rd  
 Phoenix, AZ 85027

We are writing to let you know that we agree with you on making the Coyote Mtns a non-wilderness area, as we have enjoyed that area for our picnics & camping, etc. We would hate very much that we would not be able to visit there anymore.

Thank you,  
 Jay Jones  
 District Manager  
 Phyllis David  
 Tucson, Arizona  
 85547 1173

4322 E. 7th St.

Tucson, AZ 85714

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MARCH 20 1985

BLM

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02/20/85

Phoenix District Manager  
 Bureau of Land Management  
 2015 W. Deer Valley Road  
 Phoenix, AZ 85027

Dear Sir:

In regard to the Draft Wilderness Environmental Impact Statement covering wilderness consideration for the Mount Wilson WSA, Hells Canyon WSA, White Canyon WSA, Picascho Mountains WSA, Coyote Mountains WSA, and Baboquivari Peak WSA, I disagree with your proposed action.

It is my opinion that all of the above areas, not just Baboquivari Peak, deserve to be added to the Wilderness System.

I am familiar with all of the WSA's except Mount Wilson. While they are small units, they are areas that are unique. White Canyon is a lovely spot that is easy to get to and offers a real wilderness experience to those who are used to easy hiking. Really, if there were good copper deposits in there, it would have been mined by now.

The other areas, Picascho Mountains with Newman Peak, the Coyote Mountains, and Hells Canyon - all are lovely places that are rugged and offer a true wilderness experience and solitude. They should all be recommended for wilderness designation.

Sincerely,

*Sidney M. Hirsch*  
 Sidney M. Hirsch

# 58



## National Parks & Conservation Association

1701 Eighteenth Street, N.W. • Washington, D.C. 20009

ROSELL B. BUTCHER  
Regional Representative  
SOUTHWEST & CALIFORNIA  
Box 57  
Cottonwood, AZ 86326  
(602) 634-5758

(202) 265-2717

March 6, 1985

Mr. Marilyn Jones  
District Manager  
Phoenix District Office  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

RE: Phoenix Draft Wilderness  
EIS

Dear Marilyn:

We appreciate this opportunity to respond to the Draft Environmental Impact Statement for the Phoenix Wilderness EIS Area, of December 1984. After giving the document's proposals a careful review, we would like to offer the following:

(1) We strongly favor your proposal to recommend the Babouquivari Plateau WSA for wilderness—even though the westerly half of the peak area lies within the Papago Indian Reservation. We understand there are some concerns among the local ranching interests over the wilderness proposal; we hope these concerns can be addressed and laid to rest, as we believe there should be no conflict between wilderness and ranching.

(2) Coyote Mountains WSA we feel strongly should be recommended for special protection of its outstanding scenic and other natural features—preferably as wilderness. The exfoliating granite domes and the maze of side canyons make this relatively small area of just over 5,000 acres a real gem. In fact, if Coyote Mountains were in state ownership, it would doubtless be recommended as a state park. As it is, we can visualize a BLM wilderness area, with a state park on adjacent state lands. Since there is no mining or other apparent land use conflict in the area, there seems no reason not to offer this unique place the most complete form of land protection. Looking at it from a national perspective, we urge that it would be an outstanding addition to the National Wilderness Preservation System—of small size but of top quality.

## 2-NPCA response to Phoenix draft wilderness EIS

(3) White Canyon WSA encompasses a truly exceptional desert canyon—although a small area of not quite 7,000 acres; nevertheless, another scenic gem. We recognize the fact that mining interests, notably Kennecott Copper Corporation, value the whole area, of which White Canyon is but a small part, as potentially valuable for copper resources; and we realize there is an inactive mine about three-quarters-of-a-mile from the WSA, plus Kennecott's Ray Mine is a few miles eastward from the WSA, the latter separated from the White Canyon vicinity by a major highway. Yet, we wonder if there is not a way to resolve this conflict between the mineral interests and wilderness such as we were able to do up on the Arizona Strip. In negotiations with Energy Fuels Nuclear, Inc., we "fine-tuned" the boundary of the Snake Gulch part of the Kanab Creek Wilderness, even though that part of the wilderness area came close to the company's Pigeon Mine. And in the Grand Wash Cliffs, we worked out a compromise wilderness, even though that whole area was seen by Energy Fuels as having a high potential for uranium resources. It seems to us, in other words, that some way should be possible for the mining and wilderness interests to agree on a mere 5,000-to-7,000 acres of the magnificent White Canyon area for wilderness protection.

(4) Hells Canyon WSA deserves some form of enhanced protection. Rather than your proposed action, we urge the "No Action" alternative, under which this scenic 9,300-acre area would be managed according to the Black Canyon MHP that would (a) incorporate the WSA into the proposed Buckhorn Mountains Scenic Area, (b) restrict or prohibit developments that would impair the area's outstanding scenic quality, (c) withdraw Gedar Basin (250 acres) from mineral entry, (d) restrict OHV use to designated roads, and (e) implement the Black Canyon Habitat Management Plan for Wildlife. We agree that Hells Canyon may be a difficult area to recommend for wilderness status (although naturally we would not oppose such a designation). If the No Action protection provisions could be applied, we believe the significant natural qualities could be adequately protected.

(5) Piacho Mountains WSA, we realize, is being urged by some environmentalists for wilderness. We do not say the Piachos would not make an excellent wilderness area, but we think the primary emphasis for some kind of enhanced protection should be focused upon wildlife values. In particular, we urge that a high priority be given to protecting the habitat of Arizona's desert population of desert tortoise. Actually, to realistically accomplish this objective, such an effort should be jointly undertaken by BLM and the State of Arizona, since much of the tortoise habitat is on surrounding state lands. Possibly the most appropriate BLM land designation status, therefore, would be an ACEC (Area of Critical Environmental Concern). We would welcome this action.




3-NPCA's response to Phoenix draft ~~Wilderness~~ <sup>Final EIS</sup> EIS

(6) Mount Wilson WSA inclusion ~~is~~ <sup>is</sup> ~~an~~ <sup>an</sup> outstanding desert bighorn sheep habitat that overlaps ~~the~~ <sup>the</sup> ~~area~~ <sup>area</sup> adjacent to Lake Mead National Recreation Area. We urge ~~that~~ <sup>that</sup> ~~emphasis~~ <sup>emphasis</sup> in this wilderness study area should be placed on protecting and enhancing this vital habitat. There should be a ban on ORVs (which would be consistent with National Park Service policy on its part of this bighorn habitat) and there should be a mineral entry withdrawal on those mountainous parts of the WSA that make up the bighorn habitat.

We appreciate this chance to comment on the Draft EIS. Please don't hesitate to ask, if we can offer any further help or views.

Sincerely,

  
Russell D. Butcher  
Southwest 4-California Representative  
Box 67, Cottonwood, AZ 86326

P.O. Box 224  
Chandler, Az. 85224  
(602) 961-2362

March 5, 1985

Phoenix District Manager, BLM  
Phoenix, Az.

Dear BLM Manager:

I am writing in response to your Draft Wilderness Environmental Impact Statement, which I believe is open for comment until March 11. I would like to point out some of the key things which, I believe, support wilderness designation for the five Wilderness Study Areas which your bureau has not seen fit to protect.

White Canyon has plentiful riparian vegetation, and thus much wildlife, and would provide excellent habitat for the reintroduction of endangered/threatened species.

Hell's Canyon has an unusual area in Cedar Basin where Junipers and Saguars grew together. It provides crucial habitat for the Gilbert's Skink, and has been proposed for Natural Area designation by the State Natural Area Advisory Board.

The Pisache Mountains are home to eight special status species, including the Desert Tortoise. This area is also worthy of consideration for the reintroduction of Bighorn Sheep.

Mount Wilson is another area which provides suitable habitat for sheep. They are now found on adjacent Park Service lands. This area is adjacent to lands in the Lake Mead Recreation Area which have been proposed for wilderness.

The Cozyste Mountains area contains a classic Hohokam compound, and is visited frequently by people attracted by its history, geology, wildlife, solitude, and beauty.

RECEIVED

(2)

As an avid hiker, climber, and a avid supporter, and as a frequent user of many various areas, I feel I must challenge some of the reasoning used in the classification of these areas the wilderness classification which they deserve.

Three areas were claimed to be too small in size and/or too close to man-made features. I would like to point out that most of these areas contain rugged canyons and steep terrain which provide solitude, and none are really close enough to any urban area to lose that sense of remoteness. Thus I feel that 'small size' is a poor reason for not protecting an area. Mineral potential is an equally weak reason. It has been challenged by many people before, and I feel no elaboration should be necessary.

The final points are in order. One is that the Mount Wilson area was considered not to have characteristics 'unique to this area alone'. Does this imply that we are only to protect one area of a kind? This is utterly ridiculous. The second point is that in the Coyote Mountains area there are few cattle and no mining claims. Since the primary interest in this area is recreation, there is no reason for not making it a wilderness area.

In closing I would like to ask two questions. How many more species will be lost, largely due to lack of suitable habitat, in the next generation? Will our children be able to enjoy this land as we have, or will they only inherit clear cuts and mines?

Sincerely,

*Jim Frankenkfield*  
Jim Frankenkfield

P.O. Box 4021  
Cave Creek, AZ 85311  
March 5, 1985

United States Dept. of the Interior  
Bureau of Land Management  
District Manager  
Phoenix District Office  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Sirs:

I am writing in reference to the Draft Wilderness Environmental Impact Statement for the Phoenix District. I hope that my comments will be considered.

I want to go on record as supporting the All Wilderness Alternative. In a rapidly growing population center such as central Arizona, preservation of wilderness is essential. It provides an essential outlet for many types of primitive recreationists. These include wilderness backpackers, photographers, bird watchers, hunters, rock collectors and other seeking outdoor solitude and beauty. Wilderness areas add to the attractiveness of the state as a whole.

Many of the existing wilderness areas in Arizona on Forest Service and BLM land receive extensive use of the type listed above. A visit to the Superstitions on any weekend during the fall, winter, or spring reveals the popularity of this wilderness area. Five of the six WSAs have characteristics equal to the Superstitions. Designation as wilderness will increase their popularity and tend to distribute wilderness users from the extremely heavy use areas already designated.

I will now discuss two of the WSAs specifically.

Mt. Wilson is the one area not like the Superstitions. It resembles desert wilderness found to the north in the Great Basin areas of Nevada and Western Utah. Mt. Wilson is a prime wilderness candidate. It is easily accessible from US 93 and offers visitors to Lake Mead a chance to avoid the crowds and experience some real desert wilderness hiking. The top of the ridge offers panoramic views in all directions, including to the Grand Canyon. A lucky visitor who moves stealthily and patiently may also have an opportunity view bighorn sheep. I have. The Proposed Action will endanger these views and animals. The splendid view from US 93 will be lost if a mining company attempts to explore the shoddy mineral potential in this area. It is important to preserve this superb wilderness area now.

## Arizona Native Plant Society

P.O. Box 41206 - Sun Station - Tucson, Arizona 85717

6 March 1985

District Manager, Bureau of Land Management  
Phoenix District Office  
2015 West Deer Valley Road  
Phoenix, AZ. 85027

Dear District Manager:

The Arizona Native Plant Society, with affiliates in six Arizona cities advocates the protection and preservation of our native flora. We would like to express our disappointment at the Phoenix District's recommended proposed action in the Phoenix Draft Wilderness Environmental Impact Statement.

The proposed action fell short of the intensive analysis necessary to ensure an unbiased, objective study. The LIS on page 13 states " the Mount Wilson, Picacho Mountains, Coyote Mountains and Baboquivari Peak NSA's are considered manageable under any alternative. There are no current or anticipated land uses within the NSA's considered detrimental to the long term manageability of the areas as wilderness".

Therefore, the District's proposed action and recommendation of only 2,065 acres for wilderness status out of 94,713 is totally unacceptable.

The Baboquivari Peak NSA is being studied for wilderness under section 202 of FLPMA of 1976. This means that the Phoenix District Office may not recommend any wilderness at all under section 603(c), which is 96% of the total acreage under review. This is an unequivocal denial of the responsibilities entrusted to you under FLPMA.

As population-pressure increases so do demands on our public lands. Wilderness hiking, backpacking and other non-impairing recreation will require additional areas if we are to accommodate these demands. The proposed action does not adequately address this need.

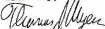
These NSA's by virtue of their locations make them accessible to more people, and to those who desire open space and are concerned with the preservation of the surface space. These NSA's if protected would provide them that assurance.

CONSERVATION DIVISION

The Coyote Mountains are foremost on my list of desired wilderness. This NSA will preserve a mountain landscape with diverse ecosystems. One can climb from Lower Sonoran through desert to Pinalon's. One shouldn't be surprised to find remnant Ponderosa pines. The adjacent Grandditch provides excellent homes for wildlife. It is not worth making the loss of these resources for future speculation on "moderately productive" land production.

Thank you for allowing me to share just a few of my concerns. Again, I hope you change to the All Wilderness Alternative.

Sincerely,



Thomas J. Myers

# Arizona Native Plant Society

P.O. Box 41206 - Sun Station - Tucson, Arizona 85717

The variety of biotic communities within these WSA's are rather impressive, among them Mohave Desert Scrub, Upper and Lower Sonoran Desert, Semi-Desert Grassland and Deciduous Mixed Broadleaf Riparian. Riparian areas, rare in the desert southwest should be preserved wherever they occur. The home and cover it provides to the great number of plants and animals dependent on its permanent water sources are unquestionable.

Mineral resource potential in the WSA's are mostly low to moderate and only rarely high. Much of these potentials are based on geologic inference. As depressed as the economy is in regards to minerals recovery, it seems a little superficial to withhold these WSA's from wilderness designation based on the current status of the industry.

Addressing each WSA individually:

## MOUNT WILSON WSA

Mount Wilson is the only WSA in the Phoenix District Area that has Mohave Desert Scrub as its principle wildlife habitat. This and the lack of historical intrusion in the area has enhanced its wilderness qualities and improved the wildlife qualities. Page 47 of the LIS states "almost the entire Mount Wilson WSA is crucial desert bighorn sheep habitat classed as high value."

The dropping of the Black, Wabayuna and Aubrey Peak WSA's from wilderness consideration because of subsurface mineral conflicts, warrants the Mount Wilson WSA for just such status.

Five protected plant species may occur in the Mount Wilson WSA.

## HELLS CANYON

The natural condition of Hells Canyon, its ruggedness and primitive hiking opportunities warrant consideration for wilderness protection.

The Cedar Basin area is being considered for designation as a natural area by the Natural Area Advisory Council.

Potential for mineral development is low to moderate, and impacts from non-designation could jeopardize this unique area.

# Arizona Native Plant Society

P.O. Box 41206 - Sun Station - Tucson, Arizona 85717

## WHITE CANYON WSA

A precious few places exist in Arizona's Sonoran Desert that are as outstanding as this small White Canyon WSA. Riparian communities are by no means commonplace and we are fortunate as to have one so near. The variety of biotic communities and significant botanical values are impressive as is the scenery. It should be preserved so others may enjoy its exquisite beauty as I have when I had the opportunity to inventory its flora for the BLM, the summer of 1982.

Elements of upper and lower Sonoran Desert, grassland, chapparal are abundant and the mixed broadleaf riparian trees as willow and cottonwood line the canyon floor and sandy washes.

Three protected plant species may occur in the White Canyon WSA.

Rare as the riparian habitat is, they are by far the most productive. The White Canyon WSA may be suitable for the introduction of three sensitive wildlife species. The area is in excellent condition and human impacts in the canyon are minimal.

Mineral resources in the canyon are low to moderate and non-designation may jeopardize this biologically significant resource.

## PICACHO MOUNTAINS WSA

The naturalness and rugged steep slopes and canyons of this granitic range should be protected so it may remain its wilderness qualities.

Having inventoried this area as well I was impressed in how well preserved and unimpacted it was. Trails are virtually non-existent and the canyons are extremely steep and can be quite hazardous to the unseasoned hiker. The shaded cool confines of the narrow canyons offer a wide variety of the more uncommon desert flora.

Non-designation would open up the area to development as a communications site leading eventually to the establishment of roads for access.

## COYOTE MOUNTAINS WSA

Of all the WSA's in the Phoenix District, none can equal this area's

*Hand Carried En  
3/11/85 - 12:45 P.M.*

## Arizona Native Plant Society

P.O. Box #1206 - Sun Station - Tucson, Arizona 85717

JIMMY G. SCHARNEK  
840 E. WINDSOR AV  
PHOENIX, AZ 85006  
(602) 265-6720

MARCH 10, 1985

unique scenic, geological, botanical elements and the unlimited non-inspiring recreational resources they afford.

The elevational changes in the Coyote Mountains allows for the high plant species diversity, many of which have affinities in Mexico. Significant botanical communities found within this WSA are the Sonoran Desert Scrub, Oak Woodland, and desert shrub riparian with mesquite, Acacia and willow.

Having inventoried parts of this WSA for the Phoenix District I refuse to accept the Bureau's assessment that this area wilderness qualities are limited by its small size.

The Coyotes WSA's close proximity to the Baboquivari Mountains makes it virtually contiguous and separated by an outwash plain of superb Sonoran Desert Scrub, creosote and bursage. This makes in your estimate of a small somewhat limited wilderness area much greater and the potential for backcountry travel and primitive recreation all the more outstanding.

The Coyote WSA may also support populations of nine protected plants. Recollections of my inventorying experience in the Coyote Mountains brings back very vivid images of massive granite boulders, rugged peaks, waterfalls and a very unusual but significant plant species diversity. The snakes, deer and foxes seen there are also fond memories.

### BABOQUIVARI PEAK WSA

The Arizona Native Plant Society concurs with the Draft Environmental Impact Statement in their recommendation of the Baboquivari Peak WSA as wilderness.

The Board of Directors of the Arizona Native Plant Society on behalf of our membership wish to thank the Bureau for the opportunity to publicly comment on this draft EIS. We hope that you will look favorably upon our recommendations and consider the all wilderness designation.

Sincerely,

*Marc Hittleman*  
Marc Hittleman for  
Arizona Native Plant  
Society

DISTRICT MANAGER  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT OFFICE  
2015 W DEER VALLEY ROAD  
PHOENIX, ARIZONA 85027

DEAR DISTRICT MANAGER,

THE FOLLOWING COMMENTS ARE MADE IN REFERENCE TO THE BLM'S WILDERNESS EIS CONCERNING THE WSA'S FOR THE PHOENIX RESOURCE AREA AND THE CERBAT-BLACK PLANNING AREA OF THE KINGMAN RESOURCE AREA PUBLISHED IN DECEMBER OF LAST YEAR. SOME OF MY COMMENTS WILL ALSO BE CONCERNED WITH THE PUBLIC MEETING HELD AT THE MARICOPA BOARD OF SUPERVISORS AUDITORIUM ON FEBRUARY 7TH, 1985.

I HAVE READ OVER THE DRAFT EIS COMPLETELY AND FOUND IT TO BE QUITE A COMPLETE REPORT. I MUST COMMEND YOU AND YOUR PEOPLE FOR A VERY THOROUGH JOB EVEN IF I DO DISAGREE STRONGLY ON YOUR RECOMMENDATION.

THERE ARE MANY REASONS WHY I DO NOT AGREE ON YOUR FINAL RECOMMENDATION FOR THE 6 WSA'S INVOLVED. MATHEMATICS, ALTHOUGH ONE OF MY LEAST FAVORITE SUBJECTS IN SCHOOL, PROVES TO BE A STARTING POINT FOR MY ARGUMENTS AGAINST YOUR REPORT. SHEEP NUMBERS WOULD INDICATE THAT SOMETHING IS WRONG. OUT OF THE 34,713 ACRES THAT ARE INVOLVED IN THIS REPORT, YOUR FINAL RECOMMENDATION PUTS AWAY A MEASLY 2065 ACRES FOR WILDERNESS DESIGNATION. THAT COMES OUT TO A PALTRY 3.7% OF THE TOTAL AREA STUDIED!!! THAT IS EMBARRASSING IN ITSELF. ARE THE SCALES OF FAIRNESS AND THE RULE OF THE BIG BUCK (AS IN MINERAL EXPLORATION) THAT OUT OF BALANCE?? I SURE HOPE NOT. IN THIS LETTER I WILL ARGUE THAT THE ENHANCED WILDERNESS IS BEST FOR ALL SIDES CONCERNED IN THIS ISSUE. UNDER ENHANCED WILDERNESS THERE WOULD BE A TOTAL OF 31,966 ACRES PUT AWAY FOR WILDERNESS AREAS. THAT COMES OUT TO A FAR MORE REASONABLE PERCENTAGE OF 58. ALTHOUGH OVER HALF GOING TO WILDERNESS DESIGNATION BUT FAR MORE JUST THAN A SMALL FIGURE OF 3.7%.

BUT THERE ARE MORE IMPORTANT REASONS THAN NUMBERS ALONE. UNDER ENHANCED WILDERNESS THREE WSA'S WOULD BE GRANTED WILDERNESS DESIGNATION. THOSE THREE ARE MOUNT WILSON WSA, COYOTE MOUNTAINS WSA & BABOQUIVARI PEAK WSA. MY REASONS FOR SUPPORTING THOSE THREE REASONS ARE ALL INCLUDED IN YOUR REPORT.

MOUNT WILSON OFFERS MANY OUTSTANDING OPPORTUNITIES FOR SOLITUDE. THE RUGGEDNESS OF ITS TERRAIN OFFERS LITTLE OPPORTUNITY FOR ORV USE THEREFORE MAKES THIS AN EASILY MANAGED AREA. ALMOST THE ENTIRE RANGE IS CRUCIAL DESERT BIGHORN SHEEP HABITAT CLASSIFIED AS "HIGH VALUE". THIS IS TOO IMPORTANT TO LET GO UNPROTECTED. ALLOWING MINING IN THIS AREA WOULD CAUSE GREAT HARM TO THIS AREA AND WOULD ADVERSELY AFFECT THIS PRECIOUS DESERT BIGHORN SHEEP AREA. DOESN'T THIS MEAN ANYTHING? THERE ARE ALSO FIVE PROTECTED PLANTS IN THE AREA THAT NEED TO BE CONSIDERED IN THIS AREA.

63



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 6 1985

RECEIVED

BLM, PHOENIX DIST. OFF.

PHOENIX, ARIZONA

MAR 11 1985

AM 9:30 PM  
7509101112304166

AS FOR THE COYOTE MOUNTAIN NSA, I FEEL THIS IS ALSO IN A STRONG POSITION FOR WILDERNESS DESIGNATION. EVEN THOUGH THIS IS A SMALL AREA, YOUR EIS ADMITS THAT THE POTENTIAL MANAGEMENT PROBLEMS ARE "MINOR" AND ARE "NOT A MAJOR CONSIDERATION IN THE UNSUITABLE RECOMMENDATION." AS FOR THE MINING ISSUE, YOUR REPORT STATES THAT "DUE TO THE LONG ABSENCE OF MINING ACTIVITY IN THIS AREA...RESUMPTION OF MINING ACTIVITY IS UNLIKELY," AND "THEREFORE IS NOT A SIGNIFICANT MANAGEABILITY CONCERN." THE HUGE ROCK FACES AND RUGGED PEAKS ARE SOMETHING TO BEHOLD WITH AWE AND AMAZEMENT FOR THOSE OF US WHO HAVE HAD THE OPPORTUNITY TO SEE THIS AREA. I HAVE HAD MANY EXCURSIONS OF DAY HIKES IN THIS AREA AS WELL AS MANY OTHERS WHO I HAVE SEEN ENJOY THE UNIQUENESS OF THIS AREA. I HAVE ALSO SEEN MANY DEER AND A FEW BIGHORN SHEEP WALK IN THIS AREA. ACCORDING TO YOUR EIS, "ARCHAEOLOGICAL REMAINS OF PREHISTORIC INDIANS...LIE WITHIN THE UNIT. APPROXIMATELY 250 ACRES ARE CONSIDERED "CULTURALLY SENSITIVE." THESE MOUNTAINS MAY PROVIDE HABITAT FOR SEVEN SPECIAL STATUS WILDLIFE SPECIES ACCORDING TO YOUR OWN REPORT. VEGETATION CONDITIONS ARE EXTREMELY GOOD FOR WILDLIFE IN THIS AREA. THIS NSA SUPPORTS MORE SPECIES OF BIG GAME THAN ANY OF THE OTHER NSAs STUDIED IN THIS EIS. THAT ALONE SHOULD BE WORTH A LOT. AS FOR THE POTENTIAL FOR MINING OPPORTUNITIES, IN 1976 THE BLM'S SILVER BELL MFP RECOMMENDED THIS NSA AS A "PRIMITIVE AREA" YET NOTHING WAS DONE. THAT REPORT ALSO STATED IN ITS RECOMMENDATION THAT THIS AREA BE LABELED "BACKCOUNTRY". THIS IS FROM YOUR OWN REPORTS WHICH SHOULD BEAR SOME WEIGHT WITH YOU. ONE LOOK AT MENDOZA CANYON'S BLIFFS WOULD LEAD ONE TO BELIEVE THAT THIS INDEED IS AN AREA THAT SHOULD BE PROTECTED FROM DEVELOPMENT OF ALL FORMS AND TYPES. THIS AREA CONTAINS A WIDE VARIETY OF PRIMITIVE RECREATIONAL OPPORTUNITIES THAT MUST BE PRESERVED SUCH AS HIKING, HUNTING, ROCK CLIMBING, PHOTOGRAPHY, SIGHTSEEING, AND THE GENERAL VIEWING OF PLANTS AND ANIMALS.

BARDOUVIARI PEAK NSA OFFERS MY EASIEST ARGUMENT SINCE IN YOUR PROPOSED ACTION YOU ALREADY RECOMMEND WILDERNESS DESIGNATION. THE OPPORTUNITIES FOR ROCK CLIMBING ARE NOT SURPASSED IN ANY OTHER PART OF THIS BEAUTIFUL STATE WE CALL HOME. BUT MORE IMPORTANTLY IS THE IMPORTANCE OF THIS AREA AND MAINLY THE PEAK ITSELF TO THE PAPAGO INDIAN TRIBE IN THEIR RELIGIOUS BELIEFS. THIS IS ONE OF THE MOST DRAMATIC SCENIC VIEWS LOCATED ANYWHERE WITHIN THE STATE. IT'S UNIQUENESS MAKES IT A MUST FOR WILDERNESS DESIGNATION BUT SINCE WE BOTH AGREE ON THIS ONE I WILL SPEND NO FURTHER TIME STATING MY CASE.

I AM A REASONABLE PERSON. SURE, I WOULD LOVE TO SEE ALL 54,713 ACRES OF THIS STUDY BE DESIGNATED WILDERNESS BUT I DO UNDERSTAND THE IMPORTANCE AND THE NEED FOR OTHER INTERESTED PARTIES NEEDS TO BE MET. THE MINING INDUSTRY IS VERY IMPORTANT TO EACH AND EVERY ONE OF US. BUT WHEN THEMELY SPOKESPERSON FOR THE MINING INTERESTS PRESENT AT THE PUBLIC HEARING I ATTENDED SPENDS ABOUT 30 SECONDS EXPLAINING THAT HE IS IN FULL AGREEMENT WITH THE EIS, THEN I MUST WONDER WHAT IS GOING ON. HOW ABOUT SOME DEGREE OF COMPROMISE? 3-7% IN MY BOOK, DOES NOT SPELL OUT ANY SUCH WORD. LET US MEET SOMEWHERE HALF WAY, ESPECIALLY WHEN WE ARE TALKING ABOUT THE CONCERNS OF NATURE. NATURE DOESN'T HAVE A VOICE TO COME UP AND TELL US WHAT IT WANTS. BUT IT SHOULD BE PLAIN TO SEE WHAT IS BEST FOR THEM. TO BE MERELY LEFT ALONE IN PEACE. WHAT MORE SHOULD BE GIVEN? I HOPE THAT YOU WILL SEE THIS AS AN IMPORTANT ISSUE. I HAVE ALWAYS ADMIRED THE INDIANS FOR THE WAY THEY WORKED IN HARMONY WITH NATURE. IT IS HIGH TIME WE WERE LED BY THEIR EXAMPLE.

PLEASE LISTEN AND MAKE A DECISION THAT IS JUST AND FAIR FOR ALL THOSE CONCERNED... ESPECIALLY THE ONES WHO ARE MOST AFFECTED BY THIS DECISION--THOSE WHO CALL HOME WHAT WE CALL THE WILDERNESS (AT LEAST I HOPE WE CALL IT THAT!). THANK YOU FOR YOUR TIME AND THE OPPORTUNITY TO ADDRESS THIS IMPORTANT ISSUE.

SINCERELY,  
  
JERRY D. SHARKEY

Ms. Marilyn V. Jones, District Manager  
Phoenix District Office  
Bureau of Land Management  
U.S. Department of Interior  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Ms. Jones:

In response to your letter to our office dated December 1984, we have reviewed the Draft Environmental Impact Statement (EIS) prepared by the U.S. Department of the Interior for the wilderness designation of wilderness study areas located in the Phoenix Resource Area and in the Corral-Black Planning Area of the Kingman Resource Area. Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed activities. No potential effects were identified; therefore, we have no specific comments on the draft EIS.

Thank you for the opportunity to review the draft document.

Sincerely,

James P. Knight, Acting Director  
Division of Engineering  
Office of Nuclear Reactor Regulation

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RECEIVED

BLM, PHOENIX DIST. OFF.  
BUREAU OF LAND MANAGEMENT,  
PHOENIX, ARIZONA  
MARCH 11 1985MAR 11 1985  
7:08 AM '85District Manager, Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Road.  
Phoenix, Arizona 85027

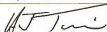
Dear Sirs,

I would like to formally state in writing my position on the Phoenix district Draft Wilderness Environmental Impact Statement. These opinions are essentially unchanged from my oral statement presented at your public hearing in Tucson on January 28 of this year.

I am strongly in favor of the "All Wilderness" alternative, and wholeheartedly urge its adoption. Furthermore, I strongly recommend reconsideration of the Ragged Top roadless area as wilderness. I feel to be persuaded by any of the anti-wilderness arguments presented in your document, and find your own research to provide many convincing pro-wilderness arguments. One of the most common anti-wilderness arguments is the small size of the USA's. I agree that larger wildernesses would be preferable, and therefore urge your office to pursue the possibility of increasing the size of these areas via land sweeps with the state of Arizona.

I would be particularly pleased to see wilderness designation for the MSA in your district that I am most familiar with, the Coyote Mountains. This area's spectacular scenery combined with its proximity to the growing metropolis of Tucson make it a prime spot to set aside for the enjoyment of future hikers and climbers, and as a preserve of natural habitat for bighorn sheep, mountain lions, and desert tortoise. In your own document you state that mining conflicts are inconsequential and that wilderness designation of the Coyotes would present you with no management difficulties whatsoever.

Sincerely,



M.J. (Jaka) Turin  
3357 North Grennan  
Tucson, Arizona 85745

March 10, 1985

Ms. Marilyn V. Jones, District Manager  
Bureau of Land Management, Phoenix District Office  
2015 W. Deer Valley Rd.  
Phoenix, Arizona 85027

Re: Phoenix Draft Wilderness EIS

Dear Ms. Jones:

This letter is written in response to the Phoenix Draft Environmental Statement (EIS) for wilderness designation in Eastern Arizona.

Public lands designated as wilderness can be viewed as a resource with an expression of worth and value for the following reasons:

1. Clear, unspoiled watersheds
2. Beautiful and unmarred vistas
3. Vegetation protection
4. Wildlife protection
5. Cultural resources
6. Wilderness recreation

The proposed action for wilderness designation represents a pitifully low percentage of the total lands involved which is administered by the BLM and the Phoenix District Office. I would therefore recommend that all of the following be designated as wilderness:

1. Mount Wilson
2. Hells Canyon
3. White Canyon
4. Picacho Mountains
5. Coyote Mountains
6. Esboquivari Peak

It is also a shame that several other areas including Ragged Top are not included for wilderness protection.

As the west continues to expand potential wilderness areas such as these continue to shrink and often disappear completely. It is only through efforts such as wilderness designation that the natural character of the land will remain for future generations.

Sincerely,



Dan Fischer

835 E. Orange Grove Rd.  
Tucson, Arizona 85718

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BLM, PHOENIX DIST. OFF.

BUREAU OF LAND MANAGEMENT,  
PHOENIX, ARIZONA

MAR 11 1985

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PHOENIX, ARIZONA

MAR 11 1985

3935 N. Country Club, #21-A  
Tucson, Arizona 85716  
March 8, 1985District Manager, Bureau of Land Management  
Phoenix District Office, 2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Sir:

I write to offer comments on the Proposed Wilderness Program for the Phoenix Wilderness EIS Area.

1. I believe all six of the Wilderness Study Areas are worthy candidates for wilderness designation and deserve the protection that such wilderness designation would provide. I object to the BLM's "proposed action" of designating only 2,065 acres as wilderness. This "proposed action" undervalues the importance of these six wilderness areas in preserving pockets of unspoiled wilderness on BLM lands. It also fails to consider the future needs of Americans desiring outdoor recreational opportunities and solitude in such pristine areas.
2. With its isolated rugged cliffs and side canyons, uncontaminated perennial streams, and impressive array of riparian wildlife, White Canyon appears unique among the six wilderness study areas. Few remaining desert canyons controlled by the BLM in Arizona possess this abundance of water and riparian habitat. The continued presence of this abundant water of good quality is critical for maintaining the productivity and diversity of a number of sensitive plant and animal species. Such diversity will not persist if White Canyon is not protected with wilderness designation. I believe that White Canyon is a valuable natural resource and showplace of the Sonoran Desert. It is highly deserving of inclusion into the BLM areas designated as wilderness.
3. The WSAs represent a small proportion of the lands managed by the BLM in the resource areas. This should have been stated in the document.
4. Given the possible alternative uses of these WSAs and the degradation to wildlife that will follow if they are not designated as wilderness, especially White Canyon and Hell's Canyon, I feel you should abandon the "proposed action." The very least that the Bureau can do toward balancing its management of public lands would be to choose the "all wilderness alternative" and designate the six WSAs, representing 34,713 acres, as wilderness.

Sincerely,

*Tim Flood*

Timothy J. Flood

67



## ARIZONA PROSPECTORS &amp; SMALL MINE OPERATORS ASSN.

Congress-Wickenburg-Yarnell Council

March 8, 1985

RECEIVED

BLM, PHOENIX DIST. OFF.

PHOENIX, ARIZONA

MAR 11 1985

7:8,9,10,11,12,13,14,15

Marlyn V. Jones, Manager  
Phoenix District  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Subject: Draft Environmental Impact Statement on Mount Wilson, Hell's Canyon, White Canyon, Picacho Mountains, Coyote Mountains, and Baboquivari Peak

Dear Sir:

The Congress-Wickenburg-Yarnell Council has asked me as Secretary to express these comments on the Phoenix EIS Draft.

We wholeheartedly support your recommendations of returning the five WSAs to non-wilderness.

In regard to Baboquivari Peak we do not understand how this could be recommended for Wilderness when it doesn't meet the required 5,000 acres mandated by Congress.

Recommending this area be designated as Wilderness does not enhance the wilderness qualities or opportunity for solitude. It is a political term that restricts the great majority of us from entering the area. Here in future years it would be a great asset to drive to the area and enjoy the remoteness and solitude. Without roads and trails we are locked out for all practical purposes.

The mineral potential has not been explored. And Wilderness designation would rigidly fix guidelines to prohibit any exploration. Minerals in Arizona have always been a great value to our economy. To lock up an area without thoroughly considering the future potential is most unwise.

We think greedy, destructive use, as well as no-use, are both "cop-outs". We believe there is no naitive quality or overriding reason to recommend that Baboquivari Peak become a National Wilderness Area.

Very truly yours,

*Dorothy Devault*  
Dorothy Devault  
Secretary





## ARIZONA MINING ASSOCIATION

C. J. HANSEN  
President

THE COMMENTS OF  
THE ARIZONA MINING ASSOCIATION  
BUREAU OF LAND MANAGEMENT  
PHOENIX DRAFT WILDERNESS  
ENVIRONMENTAL IMPACT STATEMENT  
PHOENIX, ARIZONA  
February 7, 1985

I am Jack Pursley, Director of Public Affairs of the Arizona Mining Association. The association consists of 15 major mining companies who produce most of the copper, molybdenum, silver and gold in the state.

I am commenting here today because the association is extremely concerned about the continuing actions of the Federal government to remove and restrict public lands from productive use. Approximately two-thirds of all public lands in the United States are now effectively withdrawn from mineral development. In Arizona, existing wilderness areas total 2,000,000 acres and it has been determined that approximately 30 million additional acres (two-thirds of the Federal lands in Arizona) are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service Wilderness Study Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department

68 - 1

withdrawals and numerous other withdrawals. Each of these categories has been formed by individual withdrawal actions with little or no consideration to the cumulative effect of all withdrawals on the minerals industry in Arizona and on the National Mineral Policy which encourages the search for and development of minerals critical to our national welfare. The association feels that this cumulative effect must be addressed and considered in this EIS.

Aside from this significant oversight, the preparers of the Phoenix BLM District draft wilderness environmental impact statement are to be complimented for an objective and professional product. The concepts discussed on pages 74 and 75, including the inability to quantify the loss of subsurface resources by wilderness designation with the recognition that changes in technology cause previously unknown resources to be capable of discovery and production, are concepts which the mining industry has stressed for years. It is gratifying to see the recognition and understanding of those concepts by the BLM in this statement.

The Arizona Mining Association supports the proposed action to recommend for wilderness designation, only the Baboquivari Peak Wilderness study area. Although the Baboquivari area has been rated as moderately favorable for the occurrence of metallic minerals, the relatively small size of the area compared with the size of other WSAs discussed in the statement

having greater mineral potential, allow this Association to support the proposed action as a reasonable compromise.

The enhanced wilderness alternative would cause all of the Mount Wilson and Coyote Mountains WSAs to be recommended for wilderness. The eastern half of the Mount Wilson WSA and the northern three-quarters of the Coyote Mountains WSA are rated from highly favorable to moderately favorable for metallic and nonmetallic mineral resources. We agree with the geology, energy and minerals (GEM) assessments establishing those ratings. The draft statement finds that these two areas possess only nominal wilderness characteristics. Therefore, if any further consideration will be given to the enhanced wilderness alternative, the mineralization potential considered with the nominal wilderness values should cause those mineralized portions of the Mount Wilson and Coyote Mountains WSAs to be excluded from any recommendation for wilderness designation.

68 - 2

Finally, we believe that a statement on page 90 should be corrected. On that page, the statement is made that "(I)t is probably that only the designation of White Canyon as wilderness would potentially result in large scale adverse impacts (on mineral resources)". However, other parts of the draft EIS (pages 39-45) identify portions of the Mount Wilson, Hells Canyon, Picacho Mountains and Coyote Mountains WSAs as having from moderate to high mineral potential. Therefore, the conclusion on page 90 should be revised to reflect the favorable

mineral potentials in those other WSAs which would be adversely impacted, in addition to the White Canyon WSA.

The Arizona Mining Association will submit more detailed comments prior to the March comment deadline. At this time, we feel that the Proposed Action is a good compromise. We believe, however, that the EIS should more fully reflect the cumulative impact of all withdrawals upon the minerals industry in Arizona and upon the U.S. mineral policies currently in effect. The Arizona Mining Association is eager to provide that assistance to the BLM in this endeavor.

We appreciate this opportunity to submit comments.

68-1 The state currently has about 21 million acres of federal mineral estate that is considered available for mineral entry and appropriation under the general mining laws. The withdrawal of all six WSAs considered for designation in this EIS would reduce the acreage available for mineral entry by two-tenths of one percent.

68-2 The FEIS now reflects acres with favorable mineral potential that would be withdrawn under each alternative.

69



## ARIZONA MINING ASSOCIATION

C. J. HANSON  
President

March 12, 1985

Mr. Marlyn Jones  
District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Marlyn:

Please find enclosed the comments of the Arizona Mining Association regarding the Draft Environmental Impact Statement of the Phoenix Area.

Respectfully Submitted,

R. J. Gursley  
Director of Public Affairs

RJP/jc

70

BRUCE BARBITT, Governor

Commissioners:  
FRANCIS W. WERNER, Tucson, Chairman  
CARYL A. JENNINGS, Scottsdale  
W. LINDA ROBERTSON, Flagstaff  
FRANK BAKER, King  
LARRY D. ALLARD, Inland City

Directors:  
BOB WRIGHT  
Assistant Director, Service  
ROGER A. BRUNENWALD  
Assistant Director, Operations  
DANIEL L. WERTSCH



### ARIZONA GAME & FISH DEPARTMENT

2222 West January Road Phoenix, Arizona 85023 942-3000

March 11, 1985

Mr. Marlyn V. Jones  
District Manager  
Bureau of Land Management  
Phoenix District Office  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

RE: Phoenix Draft Wilderness  
Environmental Impact Statement

Dear Mr. Jones:

The Arizona Game and Fish Department has reviewed the referenced draft environmental impact statement (EIS), and respectfully offers the following comments for your consideration.

The Department is genuinely concerned about the adequacy of the draft document, particularly with respect to the rationale/justification for dropping wilderness study areas (WSA) from wilderness recommendation and the development of the Proposed Action, Alternative 1. There appears to be no substantive supporting data for those decisions.

The resource data presented in Chapter 3 provide an accurate description of natural resource values found in each of the six (6) WSAs, as they relate to wilderness requirements. Further, Chapter 4, overall, provides insight into the environmental consequences of the alternative actions and what the potential long-term effects would likely be. The data and rationale presented in both of these chapters seem to belie the Proposed Action and the decisions for management it purports.

All six (6) WSAs have met the minimum requirements for wilderness consideration, as stipulated by the Wilderness Act, or they would have never reached this point in the study process. Additionally, activities outside of the WSA, such as mining, ranching, or rights-of-way, should have no bearing on the analysis of the area for wilderness. Further, we believe that the individual management plan for the designated wilderness can prescribe alternatives for people management problems (e.g. access, total use days) that may arise because of an area's size or unique biotic values.

Mr. Marilyn V. Jones  
March 11, 1985  
Page -2-

The flavor of the draft EIS conveys that mineral resources had a major influence on the decision-making for developing the Proposed Action, which would drop all study areas except Baboquivari Peak. And yet, according to the summary for minerals and energy (Summary, Page VIII), "The main impact of designation would be to prevent the exploitation of subeconomic or undiscovered minerals." Nonimpairing mineral exploration is not precluded under wilderness designation, and in a national emergency, where strategic minerals are known within wilderness, Congress can change wilderness status or authorize activities therein.

As previously stated in comments on prior draft wilderness EISs in Arizona, the Department generally supports the concept of wilderness classification where there is a need to protect unique or critical habitats and the fish and/or wildlife dependent upon them. Also, consideration for support is based on whether or not the classification would significantly impair the Department's ability to manage the wildlife resources within the subject classification areas/WSAs.

In evaluating the subject six (6) WSAs, along with the five (5) alternative actions, the alternative that comes closest to the Department's idea of what the long-term management direction should be for biotic resources within the WSAs is Alternative 2, All Wilderness. This alternative would not significantly affect the Department's programs, nor would it impair the Department from accomplishing its mission. We definitely cannot support the Proposed Action, since we believe it would be a step backward in management capability, from what is now available through various approved MFPA and HMPs. Further, we do not comprehend why the is stated in the draft EIS, page 13, that "The Mount Wilson, Picocho Mountains, Coyote Mountains, and Baboquivari Peak WSAs are considered manageable as wilderness under any alternative" and that "There are no current or anticipated land uses within these WSAs considered detrimental to the long-term manageability of the areas as wilderness."

The Department has a number of specific comments which we believe are necessary and which are presented by document page number.

Page 9, Mount Wilson - WSA 2-01

Under the Proposed Action, we believe that the major provisions should be the same as under the No Action Alternative, where the area would be managed under the directions prescribed by the Cerbat Mountain MFP (BLM, 1974).

Mr. Marilyn V. Jones  
March 11, 1985  
Page -3-

Page 9, Hells Canyon - WSA 2-119

Again, we believe the major provisions under the Proposed Action should be the same as those major provisions under the No Action Alternative, where the area would be managed under the directions prescribed in the Black Canyon MFP (BLM, 1973).

Page 10, White Canyon - WSA 2-187

ORVs and new rights-of-way (except for approved mineral entry) should not be included as major provisions of the Proposed Action.

Also, the Middle Gila HMP (BLM, 1981) is another management document for the area.

Page 10, Picocho Mountains - WSA 2-194

We believe that no ORV use is appropriate for the area under the Proposed Action, particularly since it reached this point in the Wilderness analysis. Additionally, we recommend that major provision 2 (page 11) under the No Action Alternative should apply under the Proposed Action as well.

Page 11, Coyote Mountains - WSA 2-202

This area definitely deserves protection from ORVs and new rights-of-way.

We strongly disagree with the sentence that, "visitors to such a restricted use area would not experience the solitude and primitive recreation opportunities usually associated with a wilderness area." We question whether the writer ever journeyed into the Coyotes.

Page 78 and 79, White Canyon WSA

We disagree with the analysis that the No Action Alternative would result in the same impacts as the Proposed Action or the No Wilderness Alternative. On page 10 of the draft, the No Action Alternative would "...be managed under the directions prescribed in the Middle Gila MFP (BLM, 1975)". The White Canyon WSA is also currently managed under the Middle Gila HMP (BLM, 1981). Therefore, we believe the No Action Alternative will result in a more favorable scenario for wildlife.

Mr. Marlyn V. Jones  
March 11, 1985  
Page -4-

To date, visitor use to the WSA has been light, including hunting recreation. The closures of the few roads within the WSA would further limit travel. We disagree with the draft's assumption that wilderness designation will automatically increase visitor use dramatically. That has not been the case in previously designated wilderness areas in southeast Arizona, i.e. the Galiuero Mountains.

Page 80, Coyote Mountains WSA

70-2 } Comments are similar to those for White Canyon. The No Action Alternative is not the same as the Proposed Action or the No Wilderness Alternative. On page 11 of the draft, the directions under No Action are described, and are all beneficial to wildlife resources. The Proposed Action and No Wilderness actions would allow ORV use and create new rights-of-way in the areas; both highly impacting activities on wildlife.

Page 80, Baboquivari Peak WSA

The entire WSA is not crucial habitat for scaled quail. Portions of the area support populations of Mearns's (Montezuma) quail. Since there are several common names for the Mearns's quail, the draft EIS should be consistent with the name used.

Page 81, Table 4-4

70-3 } We definitely disagree that the No Action Alternative will have the same negative impacts as the Proposed Action. Nowhere in the draft EIS does it state that the Proposed Action will retain the management direction of the appropriate and existing MPPs and RHPs. Conversely, the Proposed Action is very proactive in terms of road development and liberalizing ORV use, which we believe are to the detriment of wildlife resources.

In summary, the Department wholeheartedly supports and recommends wilderness designation for all six (6) of the WSAs, particularly for the Mount Wilson, Picocho Mountains, Coyote Mountains, and Baboquivari Peak areas, where no significant conflicting uses exist that would preclude BLM from managing the areas as wilderness. We believe that rejection of an area as wilderness because of adjacent land use activities is not valid or consistent with previous wilderness designations in Arizona (i.e. Pusch Ridge Wilderness, Mt. Hopkins Wilderness, and Saguaro National Monument). Further, rejection of an area as wilderness because of past manmade improvements (e.g. roads, stock waters, mining claims) is not valid or consistent with previous wilderness designations in Arizona (i.e. Galiuero corridor and Rincon Mountains).

Mr. Marlyn V. Jones  
March 11, 1985  
Page -5-

Purchance that the Proposed Action is ultimately selected in the final decision-making, we recommend that the No Action Alternative provisions be utilized for all areas not designated wilderness, and that ORV authorization and new rights-of-way be eliminated from the areas not designated wilderness.

We appreciate the opportunity to review and to offer our comments on this draft EIS.

Sincerely,

*Bud Bristow*  
Bud Bristow  
Director

BB:RKM:lea

70-1	The FEIS reflects the assumption that undesignated WSAs would be managed under multiple use.
70-2	See response 70-1.
70-3	See response 70-1.



General Comments

Establishment of wilderness area can benefit other resource and environmental values such as water quality and air quality. Designation of suitable land as "wilderness areas" tends to be environmentally preferable since it often affords a greater level of environmental protection. Accordingly, we have the following specific comments about the wilderness selection criteria in the DEIS.

1. The rationale for the Bureau of Land Management's "non-suitable" declaration of Wilderness Study Areas (WSA) is unclear. Criteria used to select only 2,065 acres for the Preferred Alternative, as opposed to 31,966 acres for the Wilderness Alternative and 8,465 acres for the No Action Alternative, should be disclosed in the FEIS.
2. The FEIS should document active and potential mineral claims, either metallic, nonmetallic, oil and gas, or geothermal, that preclude suitable declarations in the WSAs.
3. Areas where off-road vehicle (ORV) use is substantial within a WSA should also be included in the disclosure of non-suitable areas.
4. The FEIS should clarify the basis for declaring the Picacho Mountains WSA as non-suitable based on the potential for locating communications facilities in the area.

Water Quality Comments

1. The FEIS should provide baseline information and a detailed map of water resources within the resource area. The FEIS should discuss the following factors indicating management measures to protect water quality:
  - a. Springs and wells,
  - b. Ponds and reservoirs,
  - c. Perennial streams and hydrographic basins, and
  - d. Riparian communities.
2. Mitigation should be addressed in the FEIS, where possible, to provide adequate protection for water quality and maintenance of beneficial uses for each water resource listed above, especially riparian communities.

71-1

None of the actions proposed by the alternatives would change the existing water quality, therefore, water quality was not analyzed in the DEIS.

171  
71-1

Air Quality Comment

- 71-2 | The FEIS should provide baseline information for existing air quality in the resource areas.

Pesticide and Herbicide Comments

- 71-3 | 1. If pesticide or herbicide use is proposed, the FEIS should show that the compound is:
- a. Registered with EPA,
  - b. Registered for the specifically proposed use,
  - c. Marked with a current label,
  - d. Applied by a certified applicator or by personnel under the direct supervision of a certified applicator,
  - e. Used in accordance with all state and federal laws, and
  - f. Applied in such a way that precautions are taken to protect workers during the operation.
2. The FEIS should discuss the use of pesticides or herbicides in relation to the following topics:
- a. Cattle-dip treatment,
  - b. Fire prevention programs,
  - c. Predator control programs,
  - d. Deer repellent programs,
  - e. Wood preservative treatment for fences,
  - f. Vegetation control near roads and right-of-way corridors, and
  - g. Control of disease vectors such as fleas.
3. The FEIS should address the following considerations for the safe use of pesticides or herbicides in the project area:
- a. Provisions for mixing, storing, loading and disposal of pesticides or herbicides,
  - b. Spill prevention contingency plans (SPCP),
  - c. Adverse effects on nontarget species,

71-2 Air quality was not discussed for the same reason as stated in 71-1.

71-3 There were no proposals to use pesticides or herbicides in the alternatives, therefore, their use was not analyzed.



-3-

- d. Applicator safety and prespraying notification procedures,  
 e. Impacts on aquatic resources,  
 f. Current status of this pesticide or herbicide to be used, and  
 g. Alternative means of achieving desired management goals.
4. The FEIS should discuss how Southern Oregon Citizens Against Toxic Spraying v. Clark (720 F.2d 1475 [1983]) will affect herbicide spraying programs in the resource area.

## ARIZONA PROSPECTORS &amp; SMALL MINE OPERATORS ASSN.



P. O. BOX 5345  
 TUCSON, ARIZONA 85703  
 (602) 887-6812

January 30, 1985

Ms. Marilyn V. Jones  
 Manager, Phoenix District  
 Bureau of Land Management  
 2015 W. Deer Valley Road  
 Phoenix, Arizona 85027

Re: EIS for Mount Wilson, Hall's Canyon, White Canyon, Pinaloche Mountains, Coyote Mountains, Baboquivari Peak

Dear Marilyn:

I want you to know that it is a distinct and unique pleasure for us to be able at long last to agree with some Bureau of Land Management wilderness recommendations.

First of all, I would like to commend the Phoenix District for the degree of professionalism we finally get to see in the minerals summary in this EIS. We find the in-house work to be concise, factual and comprehensive. We were somewhat disappointed with the quality of the GEM reports and we feel that work of better quality at lower cost could be done by geologists at the Bureau of Geology and Mineral Technology.

We do agree with BLM recommendations on Mount Wilson, Hall's Canyon, White Canyon, Pinaloche Mountains and the Coyote Mountains as being unsuitable for wilderness. I must admit we arrived at the same conclusion by different means, but we too feel these areas are unsuitable for wilderness designation.

We disagree strongly with your recommendations on the Baboquivari, and do not find any merit in the rationale used for circumventing the criteria laid down in the Wilderness Act of 1964. Although a "highly scenic natural landmark well known in southern Arizona," this same peak is a volcanic intrusion with potential for heavy deposits, and the grade of metamorphism in these various bandings or helos around this intrusion has not been adequately explored. The potential for cobalt, vanadinite, scheelite, gold, silver, copper, lead, zinc and molybdenum are present and documented. We are confident that the minerals inventory, when performed on this area, will show economic quantities of these strategic minerals. Unfortunately, the only reason we do not have active mining in this area now, is that management agencies have never been willing to expand funds to acquire access to create revenue on the public lands; instead it has been the policy to look out minerals and devote funds

Marilyn V. Jones, Page 2

6947 E. 6th St. #4  
Scottsdale, Ar. 85251  
March 10, 1985

for access to recreation for special interest groups.

This area does not meet the area criteria mandated in the 1964 Wilderness Act, and we seriously believe it is a waste of the taxpayers money and your time to continue to inventory areas that did not meet the requirements of the law. Other reasons given for this wilderness designation bear a little logic. The Papago Tribe could have at any time requested withdrawal, through Congress, of this peak for addition to the reservation and extension of their boundary easement. There are vast deposits of strategic minerals in evidence and documented on the Papago Reservation, yet the Papago Tribe has been unwilling to allow or encourage development of minerals on the reservation.

To classify this area as wilderness only limits its potential for mineral development and limits its use to elitist, single persons, special interest groups.

Respectfully submitted,  
ARIZONA PROSPECTORS & SMALL MINE  
OPERATORS ASSOCIATION

*Janet L. Smith*

Janet L. Smith  
State President

/s/ Congressional Delegation  
All Councils

District Manager  
Bureau of Land Management  
Phoenix District Office  
2225 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Jones:

Following are my unit-by-unit comments on the wilderness study areas in the Phoenix Resource Area and the Gerbat/Black Planning Area.

Baboquivari Peak

I am very happy with your wilderness recommendation for Baboquivari, and your proposed acquisition of adjacent state lands is highly commendable as well. I hope similar state/BLM exchanges can be worked out in other WSA's, especially the Ives Peak/Arastra Mountain complex northwest of Wickenburg.

Coyote Mountains

The best arguments for preserving this area come, ironically, from the pages of the RIB that ultimately rejects that very protection. Fgs. 31-32 describe the area like this: "Cliffs, dry waterfalls, steep canyons, plant-lined washes, and exfoliating granite domes... outstanding quality and diversity of primitive recreational opportunities... geological, plant, and animal sightseeing are excellent... day hiking opportunities are superb... artists and photographers also frequent the area... intrusions are largely unnoticeable... developments do not effect the WSA's natural character... 250 acres are considered culturally sensitive... habitat for seven special-status wildlife species..." and so on. All this, yet no wilderness recommendation. I'm baffled. What more could you ask of a proposed wilderness area? The RIB says something about the area's "small size" (though far larger in terms of BLM acreage than Baboquivari), constricted visitor use in a few major canyon bottoms or ridgetops (not unlike Baboquivari, or Aravaipa Canyon for that matter), and the structures and activities of man that are visible outside the boundaries of the unit (ditto for the Superstition, Four Peaks, Pusch Ridge, Painte, Woodchute, Galiuro, Castle Creek, Kachina Peaks, and many other existing Wilderness Areas). Not one of those arguments holds water, nor are there any serious mineral or livestock conflicts that should block wilderness protection for the Coyotes. It is true that the unit is surrounded by Indian, state, and private lands, and that the boundaries are less than ideal. It looks bad on a map and may indeed present certain manageability problems, but surely the area described by the RIB in such glowing terms is worth the effort of working those problems out. The bottom line remains: this is an outstanding scenic, natural, and recreational area that is fully qualified for wilderness designation and should be treated accordingly.

#### Picacho Mountains

A better name for this unit would be Newman Peak, to avoid confusion with the better-known Picacho Peak south of Interstate 10. The important scenic, natural, and recreational values of this area are well documented in the EIS, particularly its status as crucial habitat for the largest population of desert tortises in the state. Again, though, the wrong conclusion is reached and propped up with some pretty weak excuses: the area is too small (at 4000 acres?), is surrounded by non-federal lands (all state, nonprivate), has "moderate favorability" for copper, and is being eyed as a future site for communications facilities. Copper, in economic terms, is virtually a dead issue. Existing mines have had to cut their losses by shutting down entirely, and the industry has no real cause for alarm if a few small low-grade occurrences should be included in a wilderness proposal. As for the communication facilities planned for Newman Peak: the EIS does not mention any alternative sites that might serve the Phoenix/Tucson corridor just as well without impacting any proposed wilderness. Could sites be located in the Sacaton Mountains, the Tortolitas, or one of the ranges on the Papago Reservation? These are questions well worth exploring before the integrity of a superb scenic and natural area is compromised even further than the present "temporary" site has done. All these are arguments against your no-wilderness recommendation, but there are also a number of more positive reasons why it should be changed. Newman Peak is a prominent and spectacular high point visible to thousands of people daily as they travel on the nearby Interstate. Any form of scarring on the slopes or summit of the mountain would be clearly visible and would destroy the integrity of this well-known scenic vista. Also, Newman Peak is located conveniently halfway between Phoenix and Tucson, making it an ideal and easily accessible spot for day-hikes. This rugged, undeveloped area is a perfect complement to the State Park south of the freeway, making two contrasting types of outdoor recreation available in close and compatible proximity. The importance of Newman Peak to the desert tortoise population, and, potentially, to bighorn sheep) is discussed in the EIS and is an additional reason why this unit deserves a closer and more sympathetic look.

#### White Canyon

A consistent flaw of this and other recent BLM documents relating to wilderness has been the utter lack of importance given to acknowledged wilderness, scenic, and wildlife values whenever any conflict with those values is perceived. No better example of this could be found than White Canyon, truly a jewel of the Sonoran desert with its stunning scenery, valuable riparian habitat, surprising mix of ecosystems, and superb recreational opportunities. Because an existing open-pit copper mine is located several miles away, and a known (but currently inactive) claim is located even closer (although separated from the unit by both a road and a section of state-owned land), the BLM saw a conflict and predictably but wrongly chose the theoretical economic values of the area over its known, and exceptional, natural ones. I am not merely disappointed in this use, but angry. If the BLM will not stand up and defend such a superb area against something as weak as "moderate favorability for copper" (see my comments above) or known production mines beyond the unit's actual boundary, then when will they stand up and what will they ever defend? The EIS contains an excellent descrip-

tion of White Canyon's natural values (prior to dismissing them), but if anything it underrates the area's quality. Items of note: (a) White Canyon is adjacent to a large undesignated roadless area in the Tonto National Forest. Together, BLM and Forest lands create a unit of well over 10,000 acres with an even greater diversity of landforms, ecosystems, and recreational opportunities. (b) The area contains what is thought to be one of the largest piñon trees in the world, said to be 11 feet in diameter and 55 feet high. It also contains the largest and most unusual *Saguaro cactus* I have ever seen: perhaps 50 feet high, with several main trunk grooves from a common base and more than 20 different arms. That two such outstanding individuals of species not normally found together occur in the same unit is truly remarkable.

(c) White Canyon is the only Phoenix District BLM area to contain black bears. (d) The topographic complexity of the area is quite outstanding. Comments in the EIS about its "small size" are irrelevant, especially considering the adjacent roadless Forest and State lands, and the statement that visitors "can easily see the entire WSA in one or two days" is a serious understatement. The comment about "outstanding opportunities for solitude" is true, but to follow that with "...but only for a limited number of visitors" is a cheap shot. Isn't the same true of Baboquivari, Aravaipa, Paria Canyon, or any other area you could name? I don't know of any area, not even the Grand Canyon, that can offer outstanding opportunities for solitude to unlimited numbers of people, and White Canyon with its maze of gorges, slickrock terraces, and jumbled mesas could probably tolerate more use than many areas of similar size but less complex design. In summary, you really blew it on this one. White Canyon is a superlative unit which has my full support, but send me and the crew yours. To withhold it any longer would only demonstrate your lack of any real commitment to the wilderness review process and your willingness to write off even the finest of wildlands if there are any political or economic objections, whether there is any validity to them or not.

#### Hell's Canyon

This is a delightful, surprisingly diverse area. It has rocky gorges, steep-sided peaks, open valleys, fine stretches of Sonoran desert vegetation, and an unusual relic population of chaparral in Cedar Basin. If the unit lacks a single, central distinguishing feature, that in itself is a virtue of sorts. Every other unit discussed in the EIS is essentially keyed to a single landform - a peak, a canyon, a ridge-line - and (except for White Canyon) contains little of the surrounding area, the lands that give the feature its context and serve as both foreground and backdrop when it is viewed from afar. The Hell's Canyon unit is different, offering not a large, well-defined feature but a whole complex of smaller, highly varied ones. Each is beautiful and interesting in its own right, but when considered (and preserved) as a unit, it adds up to something more than the sum of its parts. By making all of these features available together as a Wilderness Area, you would be providing a different type of recreational opportunity, more appropriate for dispersed and off-trail hiker than in a unit like Baboquivari or the Picachos. Easy nature walking in the open valleys, difficult scrambles up desert peaks, and

rook-hopping through the narrows of Hell's Canyon would all be available in the same area. It's even possible to do all of those things in a single day, as I once did during an unusual cold snap: skidding across frozen pools in Hell's Canyon (yes, a cold day in Hell), enjoying snowy panoramas from the summit of Garfield Peak, and strolling back across the flats at dusk. It was a memorable hike in large part because of the tremendous variety in a relatively small area, and the way in which the landforms complement each other with no particular one dominating. I am aware of the usual manageability problems that were cited in the EIS: occasional range development, a couple of cherry-stemmed roads, moderate mineral potential, adjacent, a non-federal lands, and two inholdings (one state, one private). As with the Coyotes, I would suggest that the quality of the area merits an attempt to deal with those problems rather than using them as an excuse to eliminate the entire unit from further consideration.

#### Mt. Wilson

Until I received the EIS I was confident that this was an area the BLM could comfortably endorse and support as wilderness. I was really astonished to learn otherwise. What we have here is:

- (a) A large unit, 24,000 acres, which is...
  - (b) exceptionally rugged and scenic, in fact comprising the highest and most prominent topographic point in the entire Hoover Dam area, visible for miles in every direction and offering from it's summit a view that extends into three states;
  - (c) has no serious livestock or mineral conflicts (the silt deposit mentioned in the EIS extends for miles outside the WSA boundaries, and I do not consider sand & gravel deposits to be a serious resource conflict);
  - (d) is adjacent on three sides to National Park lands in Lake Mead National Recreation Area, and is contiguous for most of that distance with proposed wilderness within the Recreation Area;
  - (e) provides crucial habitat for bighorn sheep which migrate freely between Park and BLM lands (the Park Service at one time was seriously interested in adding Mt. Wilson to the Recreation Area because of this);
  - (f) provides a scenic resource enjoyed by thousands of people daily as the unscarred backdrop for Highway 93 as it cuts through the Black Mountains south of Hoover Dam; and
  - (g) is an area well-known and highly regarded by outdoor enthusiasts in the Las Vegas area for it's colorful and unusual scenery and marvelous opportunities for solitude and wilderness recreation.
- What we also have here is a "no wilderness" recommendation based on a series of puzzling, false, or contradictory statements in the EIS. The segment beginning on page 22 claims initially that the unit offers outstanding opportunities for solitude but not for primitive or unconfined recreation. Yet it goes on to describe the "remote and rugged valleys and canyons," the "topographic complexity," and the extreme ruggedness which offers hikers an element of "risk and challenge" (Sounds like pretty good primitive/unconfined recreation to me.) Then it announces that in spite of all this the area somehow just isn't good enough to deserve a wilderness recommendation. No evidence is offered beyond an unconvincing reference to possible overcrowding due to hiker concentrations in the valleys and basins (they would be far more likely to follow ridgetops, and in any case their numbers would never be great at any one time due to the extreme roughness of the area and the lack

of trails). Page 9 also mentions an absence of "special features or resource values unique to this area alone." These are not requirements of the Wilderness Act and the alleged lack of them in Mt. Wilson is not an adequate excuse for disqualifying the area. I say "alleged" because if bighorn sheep are not unique, perhaps the chance to preserve a large portion of crucial habitat adjacent to National Park lands is unique. The whole line of reasoning used in making the decision on Mt. Wilson is faulty, and not at all supported by the facts.

The EIS as a whole is frequently well-written but strangely divided against itself. It accurately describes and evaluates the natural qualities of most of these areas (faking seriously only on Mt. Wilson). But it too often exaggerates the importance of whatever conflicts may exist, and then concludes that wilderness preservation will be impossible because of them. Why, may I ask, aren't the superb and irreplaceable natural values of White Canyon considered at least as important as whatever small quantities of copper may (or may not) be present within it? Might they not be given an even greater importance given a realistic look at the declining copper industry in Arizona? Why should Mt. Wilson be neglected just because it is thought in one paragraph not to be outstanding enough, and in another thought to be so outstanding that opportunities for solitude will be hurt by hordes of hikers swarming through the foothills? Your arguments on each of the five no-wilderness areas are unconvincing and do not stand up to the facts. I strongly urge you to take a careful second look at each of them before making your final decisions.

Sincerely,

*Tom Wright*  
Tom Wright



## United States Department of the Interior

BUREAU OF RECLAMATION  
LOWER COLORADO REGIONAL OFFICE  
P.O. BOX 427  
BOULDER CITY, NEVADA 89005

IN REPLY  
REFER TO LC-159  
120.1

MAR 19 1985

2

74-4 Page 82, paragraph 2 (under Picacho Mountain WSA) - The Bureau of Reclamation is no longer considering Newman Peak as a communication site associated with CAP.

Thank you for the opportunity to review the EIS.

*Roy L. Gear*

## Memorandum

To: District Manager, Phoenix District Office, Bureau of Land Management, 2015 W. Deer Valley Road, Phoenix, Arizona 85027

From: <sup>ACTING</sup> Regional Director

Subject: Review of Phoenix Draft Wilderness Environmental Impact Statement (EIS) (your December 1984 letter)

We have reviewed the subject EIS, and have the following comments to offer.

Hells Canyon Wilderness Study Area (WSA)

In association with construction of New Waddell Dam, it is necessary for the Bureau of Reclamation to relocate the Castle Hot Springs Road. The new road location would be less than 2 miles from the east border of the Hells Canyon WSA.

Picacho Mountains WSA

The desert tortoise is discussed on several pages. Statements are made that the WSA and surrounding area have the largest population of desert tortoise in the state and that it is considered crucial desert tortoise habitat (see pages 31, 50, 72, and 79). Based on our knowledge of the area and the desert tortoise, the statements need to cite a reference or modify the statements to indicate the area has a large population (not the largest in the state) and that it is important (not crucial) habitat. It is also questionable as to whether all 6,400 acres of the WSA are important habitat due to the extremely steep slopes in the center of the WSA (pages 79, and 81).

74-1 Mammillaria thornberi is discussed as a proposed threatened species within the WSA (pages 59, and 60). Again, based on our knowledge, we are not aware of documentation of its presence in that area. The statement should cite a reference. -Is its presence documented or hypothetical?

74-2 Page 28, paragraph 4 - The following sentence needs to be corrected as follows (add the underlined words): "The Central Arizona Project (CAP) . . . built along the unit's west and south boundary . . . ."

74-3 On page 50, paragraph 3 (under Picacho Mountains WSA) - It states "The BR is presently doing a tortoise study along the probable Central Arizona Project . . ." It should state "The BR has recently completed a tortoise study along the Central Arizona Project . . . ."

74-2 The draft EIS stated that Mammillaria thornberi may occur in the Picacho Mountains WSA. The final EIS states that habitat for Mammillaria thornberi occurs in the Picacho Mountains WSA. However, BLM has never found the plant in the WSA.

74-3 The final EIS has been changed to read " The Central Arizona Project . . . built along the unit's west and south boundaries . . . ."

74-4 The reference to Bureau of Reclamation's tortoise study was removed from the Final EIS.

74-5 The Bureau of Land Management has been informed by the Bureau of Reclamation that they will apply for a communication on Newman Peak.

3/20/85

Dear Sir:

We are very concerned  
over our wilderness areas!

We strongly support  
wilderness recommendations for:

White Canyon 6,968 acres

Mt. Weber 24,821 acres

Coyote Mountain 5,082 acres

Babogwiner Park 2,065 acres

Hells Canyon 9,379 acres

Picacho Mountain 6,400 acres

Kindly make our concerns  
known to the proper authority!

Thank you

P.S.

Mr. Mrs. J. E. Lilly  
Please remember 1024 W. Hillery  
the 3,245 acres of Maa, by  
state land for trade contiguous 85702  
to the Babogwiner Park  
Wilderness area! (over)

We also support:

Little Horn Mt. 90,430 acres

Little Horn " West 12,660 "

Siguel Mountain 17,640 "

N. Maricopa Mnt 10,468 "

Butterfly Hill State Memorial 9,666 "

Tabletop Mt. 37,968 acres

Woolsey Peak 73,930 "

New Water Mt. 40,375 "

Eastward Mt 111,065 "

E. Clinton Hills 36,560 "

Face Mt 27,575 "

S. Maricopa Mt 71,370 acres

John Prater  
8670 E. 24th Street  
Tucson, Arizona 85710  
March 21, 1985

Phoenix District BLM  
2015 N. Deer Valley Rd.  
Phoenix, Az. 85027

Gentlemen

I write to support the wilderness recommendations in your area jurisdiction. I have a personal concern for Baboquivon, Pinal Peak, Picacho Mountains, and Little Canyon, but I am sure that Mr. Wilson, Hills Canyon and Coyote Mountains are also deserving. Please do all possible to protect these areas.

Sincerely,  
John Prater

TO Arizona Bureau of Land Management 20 March 85  
Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

FROM Larry Zimmerman  
1050 W. Los Somos Rd.  
Tucson AZ 85704

RE Wilderness Recommendations

I urge wilderness designation for:

1) Phoenix  
Baboquivon Park (2,065 acres) and 3,245 acres of contiguous land to be acquired from the State.

- 2) Picacho Mountains (6,000 acres)
- 3) Hell's Canyon (9,379 acres)
- 4) Coyote Mountains (5,080 acres)
- 5) White Canyon (6,968 acres)
- 6) Mt. Wilson (24,821 acres)

Lower Pinal South

- 1) Little Horn Mountains (90,430 acres)
- 2) Signal Mountains (89,640 acres)
- 3) North Maricopa Mountains (90,448 acres)  
Butterfield Stage Memorial (9,546 acres)
- 4) Tabletop Mountains (77,968 acres)
- 5) Woolly Park (73,930 acres)
- 6) New Water Mountains (40,375 acres)
- 7) Englehart Mountains (117,065 acres)
- 8) Fort Clinton Hill (36,560 acres)
- 9) ~~Face~~ Face Mountain (29,575 acres)
- 10) South Maricopa Mountains (71,320 acres)

RECEIVED

78

March 21, 1985

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Sirs:

We need more Wilderness areas in Western United States, especially in Arizona where the population is growing at a fantastic rate.

I support wilderness recommendations for:

White Canyon	Mt. Wilson	Coyote Mountains
Picacho Mountains	Baboquivari Peak	Hells Canyon
Little Horn Mountains	North Maricopa Mountains	
Eagle Tail Mountains	Signal Mountain	South Maricopa Mountains
Woolsey Peak	Tabletop Mountain	

Thank you very much,

*Robert J. Schmidt*  
Robert J. Schmidt  
6220 S. 8th Place  
Phoenix, Arizona 85040

79

4818 East Olney Drive  
Phoenix, Arizona 85044  
20 March 1985

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

To Whom It May Concern:

I am writing to voice my support of the wilderness recommendations for Phoenix EIS areas of White Canyon, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Hell's Canyon, Picacho Mountains.

I also support the lower Gila South EIS areas of Little Horn Mtns, Little Horn Mtn West, Signal Mtn, North Maricopa Mountains / Butterfield Stage Memorial, Tabletop Mountains, Woolsey Peak, New Water Mountains, Edge Hill Mountains, East Clinton Hills, Face Mountain, South Maricopa Mountains.

I support the acquisition of the 3,245 acres of contiguous land east of the Baboquivari Peak WSA.

Thank you.

Sincerely,  
M. K. Fry

APR 1 1985  
BLM - PHOENIX



4115 Holmes  
Tucson, AZ 85711

Phoenix Dist BLM

Phoenix, AZ

I write to support our  
wilderness being left intact,  
untouched by climbing or  
mining interests.

Make White Canyon

Mt Wilson

Coyote Mt

Baboquivari Peak

Hell's Canyon

Picketed Mts. wilderness

Also  
keep the  
National  
Park.  
Class.

mounts  
off  
road.

areas.

Include any other suggested  
wilderness areas in Lower Pinal  
South. We should have about  
8000 more acres adjoining Babo-  
quivari Peak and get it by  
trade since it is state land. It  
does not belong to commercial  
interests. Thank you.

Gene & Rosemary Spaulding  
Citizen taxpayer and lover of  
nature

4231 E. Stanford Dr.  
Phoenix, AZ. 85018  
March 20, 1985

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, AZ. 85027

Subject: Wilderness Designation Recommendation

Gentlemen:

To fulfill the Baboquivari's potential, approximately 3300  
contiguous areas of state land should be added; demands  
on this popular area will undoubtedly increase and should  
be foreseen.

Although the Coyote Mountains are not extensive, they are  
the "real" desert and deserve preservation; moreover, there  
is no mining or grazing of any importance.

As for Mt. Wilson, the importance of this terrain as habitat  
for bighorn sheep cannot be overstated. We need it as  
an area of solitude.

To call the White Canyon "scenic" is an insult; it is a  
gorgeously dramatic locale with little mining appeal.  
Isn't beauty ever enough in itself?

And, lastly, let us not forget the Little Horn Mountains  
not-quite-twin areas: together they will be formidable  
desert tortoise and bighorn sheep habitat.

Wilderness preservation may not be a headline matter, but  
it is certainly of bedrock importance to this country.  
Please help keep parts of America unspoiled. Thank you.

Yours truly,

(Mrs) Genevieve Parker

GENE ANNE PARKER

82

401 E. Lawton St.  
Tucson, AZ 85704  
March 23, 1985

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Gentlemen:

I am writing to encourage you to recommend wilderness designation for the following areas: White Canyon, Mt. Wilson, The Coyotes, Baboquivari Peak, Hell's Canyon, and The Peach Mountains.

I am particularly concerned about the Coyotes and Baboquivari Peak. The former meets all the wilderness "specifications", including minimum size, and is truly outstanding wilderness. The latter also has outstanding natural qualities, much appreciated by recreationists, and can be brought up to size through acquisition of adjacent state land.

Sincerely,  
B. J. Miller  
Berta J. Miller

83

March 21, 1985

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

The designation of wilderness can be our gift to future generations. I support wilderness recommendations for the following:  
PHOENIX UPRR RLS  
White Canyon should be included because of its unique beauty.

Mt. Wilson provides crucial habitat for bighorn sheep and is surrounded by lands on three sides already proposed for wilderness in the Lake Mead Recreation Area. It has important wilderness characteristics.

Coyote Mountains. This natural area not only fulfills all the important wilderness characteristics, but also has 7 special status wildlife species and 8 protected plant species.

Baboquivari Peak. This area has broad public support, the peak is sacred to the Papago Indians, it has outstanding natural qualities, and contains an abundance of wildlife. You plan to acquire state land to the east to enlarge this unit. We approve your recommendation of the entire WSA as wilderness.

We hope you will also include Hell's Canyon and the Picacho Mountains in your wilderness recommendations.

LOWER GILA SOUTH UPRR RLS

Little Horn Mountains/Little Horn Mountains West. These two areas contain remarkable volcanic features and two deep canyons. Little Horn West is contiguous to the Kora National Wildlife Refuge area. These two areas provide important habitat for both bighorn sheep and desert tortoise.

Signa Mountain. This rugged area should be included in spite of the threat of mineral development.

North Maricopa Mountains/Butterfield Stage Memorial. These areas contain crucial habitat for bighorn sheep and desert tortoise, and also an abundance of prehistoric cultural sites. The areas are threatened by off-road vehicles, especially in riparian areas.

We also would like you to include the following areas in your wilderness recommendations: Tabletop Mountains, Woolsey Peak, New Water Mountains, Regisval Mountains, East Clinton Hills, Face Mountain, and South Maricopa Mountains.

Thank you for your consideration in these matters.

Sincerely,

*Janice Miller*  
Janice Miller  
3401 E. River Road  
Tucson, AZ 85712

RECEIVED

Dear Sirs,

I am writing this letter to voice my support for wilderness designations for the White Canyon, Mt. Wilson, Coyote Mtns, Baboquivari Peak, Hell's Canyon, and the Picacho Mtns. Also I support wilderness status for the Little Horn Mtns, Little Horn Mtns-west, Signal Mtn, North Maricopa Mtns, Butterfield Stage Memorial, Tabletop Mtns, Woolsey Peak, New Water Mtns, Eagletail Mtns, East Clanton Hills, Face Mountain, and the south Maricopa Mtns.

Thank You,  
Don Ayers E.I.T.

DEAR SIR :

I STRONGLY SUPPORT WILDERNESS RECOMMENDATIONS FOR THE FOLLOWING AREAS.

PHOENIX EIS

WHITE CANYON (6,268 ACRES)  
MT. WILSON (24,821 ACRES)  
COYOTE MTR. (5,080 ACRES)  
BABOQUIVARI PEAK (2,065 ACRES)  
HELL'S CANYON (9,379 ACRES)  
PICACHO MOUNTAINS (6,400 ACRES)

LOWER GILA SOUTH EIS

LITTLE HORN MOUNTAINS (90,470 ACRES)  
LITTLE HORN MOUNTAIN WEST (10,660 ACRES)  
SIGNAL MT. (19,640 ACRES)  
NORTH MARICOPA MTS. (70,488 ACRES)  
BUTTERFIELD STAGE MEMORIAL (9,566 ACRES)  
TABLETOP MOUNTAIN (37,968 ACRES)  
WOOLSEY PEAK (73,930 ACRES)  
NEW WATER MTS. (40,375 ACRES)  
EAGLETAIL MOUNTAINS (117,065 ACRES)  
EAST CLANTON HILLS (36,560 ACRES)  
FACE MTS. (27,575 ACRES)  
SOUTH MARICOPA MOUNTAINS (71,370 ACRES)

ALSO BABOQUIVARI PEAK WILDERNESS RECOMMENDATION  
3,245 ACRES OF CONTIGUOUS STATE LANDS  
BY TRADE.

Thank you,  
Scott Hudson

RECEIVED  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT OFFICE  
APR 2 1982

RECEIVED  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT OFFICE  
APR 2 1982

928 E. Cavalier Dr.  
Phoenix, AZ 85014  
March 21, 1985

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Reader:

I am writing in support of address recommendations for the following areas which I understand you have not included in your proposed recommendations:

White Canyon  
Mt. Wilson  
Coyote Mountains  
Baboquivari Peak  
Little Horn Mountains  
Little Horn Mountains/West  
Signal Mountain  
North Maricopa Mountains / Barberfield Stage Memorial

I have generally been in the White Canyon, Little Horn Mountains and North Maricopa Mountains / Barberfield Stage Memorial areas and feel it would be a real tragedy if these areas are not included. We are not creating any more potential address areas. They will be gone and gone in time, gone in mind, at an opportunity that we give these areas while we still have the opportunity. Please include all of the above areas in your recommendations.

Sincerely,  
Frank S. Loulan  
Frank S. Loulan

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, Az. 85027

March 21, 1985

Dear Sir or Madam:

I am writing to you today as both an Arizona resident for the past 25 years, and also as a member of the Sierra Club. I urgently request that you support wilderness recommendations for Phoenix EIS and Lower Gila South EIS.

Also, Baboquivari Peak wilderness should include 3,245 acres of contiguous state land that should be acquired by trade.

Our beautiful state can only be preserved for the enjoyment of future generations by your action. Once gone, it can never be recovered. Thank you for your attention to this matter.

Sincerely,

Nancy L. Russell

Nancy L. Russell

APR 2 1985  
RECEIVED  
PHOENIX DISTRICT BLM  
RECEIVED

88

March 22, 1985

Phoenix District  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Sir:

It has just come to my attention that the Bureau of Land Management has released its recommendations for wilderness designation for certain areas in Arizona, and that public comment on these is being solicited.

I am a native of Arizona and have lived here for most of my 65 years. The changes during that period, especially the pressures of population growth, have been tremendous. With that in mind I urge you to include not only very large areas for wilderness designation such as the Little Horn Mountains, North and South Maricopa Mountains, Woolsey Peak, Eagletail Mountains, but also smaller areas like White Canyon, Coyote Mountain, and Baboquivari Peak (this should also include 3285 acres of state land that should be acquired by trade), and Signal Mountains.

Since population is exploding with no end in sight, we must act now to preserve as much wildlife habitat, scenic areas, and recreational opportunities as we possibly can. Possible potential for copper production, oil and gas leases (not producing) should not stand in the way of protecting Arizona's unique wild areas. Off road vehicles and grazing should be strictly controlled so that these beautiful areas are not destroyed for the pleasure or profit of a few.

Yours truly,

*William Longley*  
William Longley  
1729 W. State  
Phoenix, Arizona 85021

RECEIVED

89

March 22, 1985.

Dr. Walter A. McElenaghan  
8612 East Virginia Avenue  
Scottsdale, Arizona 85267

Phoenix District BLM,  
2015 W. Deer Valley Rd.,  
Phoenix, AZ 85027

Dear Sirs:

Having read the Environmental Impact Statements on areas in the Phoenix District authority, I am amazed and shagrined to find that your office -- or, at least, the BLM -- is recommending against 6 out of the 7 he denied Wilderness classification. I am writing to urge that all of these specific areas BE INCLUDED in favorable recommendation.

I refer to those designated as: WHITE CANYON, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Lower Gila South, including Little Horn Mountains and Little Horn Mountains West, Signal Mountain, and the North Maricopa Mountains.

Having lived in Arizona from 1936 to 1939 and continuously from 1955 to the present, I know something of the areas under consideration. While I am now of an age where I cannot get out and enjoy those places in person I surely believe that they should be kept from being commercialized and/or despoiled. Their commercial development would soon run out and leave only despoiled areas. Their preservation can bring joy and love of nature for generations to come.

I strongly urge your favorable action on each and all of them.

Yours for the future of Arizona,

*Walter A. McElenaghan*

Dr. Walter A. McElenaghan

RECEIVED  
MARCH 22 1985  
RECEIVED

90

**Tucson  
General  
Hospital**

JOHN T. WINTER, D.O.

3/22/85

Dear Sir,

I am writing to add my  
support for wilderness recommendations

for:

Phoenix EIS (White Canyon, Mt. Wilson, Coyote Mts.,  
Babogquivari Peak, Hill's Canyon and Pinalco Mountains).

Lower Gila South EIS (Little Horn Mts and Mtns west,  
Signal Mtn, North Maricopa Mountains and Dillerfield Stage Mtns),  
Tashby Mts, Woolsey Peak, New Wits Mts, Eagle's Nest,  
East Center Hills, Fox Mtn, S. Maricopa Mtns).

The Babogquivari Peak Wilderness (one of my favorite  
hiking spots) should also include the 3,245 acres of  
contiguous state land.

Thank you. Help protect our wilderness



**Northwest  
Emergency  
Center**

 5001 West McDowell Road  
Tucson, Arizona 85704  
602-748-1121

91

 Michael L. Wundler  
1919 E. L'Ange  
Tempe, Ariz 85283

 Phoenix District BLM  
2015 W Deer Valley Rd  
Phoenix, Ariz 85027

Dear Sirs:

I am writing to state my support for areas which are not presently wilderness, but which have been reviewed by your department. I have particular interests in these areas and feel that each has features that make it unique and valuable and would like to see them finally reach wilderness designation. Please consider the following for wilderness designation.

1) White Canyon - although small this area is close to Phoenix for weekend trips and its canyons and slick rock areas transport hikers out of their everyday lives and into another time. This area is a quick reprieve for working adults.

- 2) Coyote Mountains
- 3) Babogquivari Peak
- 4) Signal Mountain

5) North Maricopa Mountains - This area's rugged terrain, and need to be protected from off road vehicle damage and intrusion make it a prime candidate for wilderness inclusion.

I appreciate the opportunity to make my recommendations known, and hope that you will seriously consider them.

Sincerely,

Michael A. Wunder

William S. Finkelstein  
401 E. Lawton St.  
Tucson, AZ 85704  
March 23, 1985

U.S. D: I Bureau of  
Land Management  
Phoenix District  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

To Whom It May Concern:

This letter is in response to the request for comments on the Phoenix and Lower Gila South Environmental Impact Statements concerning wilderness recommendations for Bureau land in Arizona. I am concerned that the Bureau has only seen fit to recommend wilderness status for such limited acreage in Southern Arizona. The growing population and development of the state means growing impact on its wildlands.

My concern is not for recreational areas, though this is important. I am concerned about the impact on the decreasing wildlife habitat and with the protection of watersheds. Since the Bureau is now mandated with the responsibilities of multiple-use management it is important that it take a holistic approach to its resource management. Wilderness management is an important component of this. Because of this I support the inclusion of the White Canyon, Mt Wilson, Coyote Mountains, Little Horn Mountains and Little Thin Mountains West, Signal Mountain and the North Maricopa Mountains and Butterfield Stage Memorial into the U.S. Wilderness System.

APR 2 1985  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT OFFICE  
RECEIVED

93

2

I also support the expansion of the proposed Baboquivari Peak wilderness area by the acquisition of state land.

Decisions made now will have a very important far-reaching effect. I hope your decisions concerning these proposed Wilderness areas will be the first steps toward responsible wilderness management for the Bureau.

Sincerely,  
William S. Furbush

4030 E. Capt. Quejido  
Phoenix, Ar 85032  
March 25, 1975

Phoenix District BLM  
2015 W Deer Valley Rd.  
Phoenix, Ar. 85027

Dear Sirs:

I write in support of preservation of wilderness areas. We look around at so much development each day - I realize the need to preserve wild areas for our children (and ourselves) to be able to experience the naturalness and environmental soundness of the earth.

Such areas include: White Canyon, Mt. Wilson, Coyote Mtns, Baboquivari Peak (with additional lands), Hellas Canyon, + Picacho Mtns. - no matter how small or insignificant these areas seem, they with others, do provide our future.

Sincerely,  
Barbara Jacobson

RECEIVED  
MARCH 27 1975  
BLM



Karl Greenblatt  
1030 W. Highland Ave  
Phoenix, AZ 85013

To whom it may concern,

I support wilderness recommendations  
for the following areas -

White Canyon  
Mt Wilson  
Coyote Mountains  
Baboquivari Peak  
Hell's Canyon  
Picaacho Mountains

Sincerely,  
Karl Greenblatt

Nov. 22, 85

Dear Sir,

I am very concerned over BLM's  
lack of support in designating the  
Mt Wilson area (here in Mohave  
Co.) a wilderness area. This  
is truly a unique & important  
wilderness area, especially since  
bordered on 3 sides by Lake Mead NCA.

Hunting, mining, grazing, &  
trapping are all allowed within  
the Hell's Bend NRA already -  
to the detriment of the majority  
of public users of the area.  
We should have one area  
that is truly protected in our  
County!

Sincerely,

Mary McBea  
Box 186  
Meadview, AZ  
86444

96

Phoenix District BLM  
2015 W. Deer Valley Rd  
Phoenix AZ 85027

FRED R ELLENOR SALINGER  
5023 DE MEDICI DRIVE  
SIERRA VISTA, ARIZONA, 85536  
Mar 24 '85

Hello:

Let us do everything we can to preserve the unique sensitive ecological balance of my "new" residence state of Arizona

Once destroyed the gems - or jewels of wilderness & wildlife are irreplaceable - and all too easily destroyed in the name of progress or unthinkingly considerations of effects of what seemingly minor incursions.

The 3,245 acres of contiguous state land should be acquired for the Boboquivari Pinal wilderness by trade or otherwise.

Sincerely,

F. H. Dalinger, P.E.

RECEIVED  
MAR 24 1985

97

Phoenix District BLM  
2015 N. Deer Valley Rd.  
Phoenix AZ 85027

FRED R ELLENOR SALINGER  
5023 DE MEDICI DRIVE  
SIERRA VISTA, ARIZONA, 85536  
Mar 23 '85

Phoenix F.I.S.

Dear people:

As a recent Arizonian, I am very interested in our maintaining & increasing our wilderness areas.

I've seen too much destroyed elsewhere. In this area of fragile ecology we must husband the irreplaceable resources of wildlife & wilderness.

These are not storehouses of materials for exploitation - rather "Irreplaceable Jewels" to be passed on as heritages for future generations.

Needless to say I believe all possible actions should be taken to preserve all the areas mentioned in Phoenix F.I.S.

Sincerely,

F. H. Dalinger, P.E.

RECEIVED

98

March 25, 1985  
5631 W. Chicago  
Chandler, AZ 85224

Phoenix District BLM  
Phoenix, AZ

I am a native of Arizona, and I spend almost every weekend backpacking and hiking. I am writing to support wilderness recommendations for White Canyon, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Hell's Canyon, and Picacho Mountains in the Phoenix EIS. I also support wilderness for the Little Horn Mountains, Signal Mountain, North Maricopa Mountains, Tabletop Mountains, Woolsey Peak, New Water Mountains, Eagletail Mountains, East Clanton Hills, Face Mountain, and South Maricopa Mountains. Baboquivari should include 3,245 acres of the contiguous state land which should be acquired by BLM for this purpose.

The overcrowded conditions in the Superstition Wilderness and along the Phoenix mountain preserve trails indicate the vast demand for this type of recreation. If BLM areas are not preserved under the Wilderness system, we can count on the Forest Service Wilderness becoming more and more overused and damaged.

Thank you for your consideration in this matter.

Sincerely,

Marjorie Woodruff

99

5121 W. 12<sup>th</sup> Ave  
Phoenix, Az. 85013  
March 24, 1985

Phoenix District BLM,  
5615 W. Deer Valley Rd  
Phoenix, Az. 85047

Gentlemen:

This is to indicate my support for the wilderness recommendations for the Phoenix EIS. I definitely feel the White Canyon should be included, as have as Mt Wilson and Coyote Mountains. The Baboquivari Peak Wilderness would be greatly enhanced by the addition of the contiguous state land, 3,245 acres.

Because of its proximity to the Kofa Refuge, why can't the Picacho Mountains be included?

I would also like to see the Signal Mountains and North Maricopa Mountains/Buttercup Stage included.

These rich midlife areas are threatened and need to be preserved. To not now is imperative. Once these lands are lost, a beautiful wilderness is gone forever.

Very truly yours,  
Rae Marie King  
(Mrs. C. B. King)

March 24, 1985

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Attn: Person in charge of Wilderness Recommendations

Dear Person:

This is to inform you I support the wilderness recommendations for:

Phoenix EIS

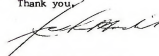
White Canyon (6,968 acres)	Baboquivari Peak (2,065 acres)
Mt. Wilson (24,821 acres)	Hell's Canyon (9,379 acres)
Coyote Mountains (5,080 acres)	Picacho Mountains (6,400 acres)

Lower Gila South EIS

Little Horn Mountains (90,430 acres)	Woolsey Peak (73,930 acres)
Little Horn Mountains West (12,660)	New Water Mts. (40,375 acres)
Signal Mts. (19,640 acres)	Eagletail Mts. (117,065 acres)
N. Maricopa Mountains (70,468 acres)	East Clanton Hills (36,560 acres)
Butterfield Stage Memorial (9,566 acres)	Face Mt. (27,575 acres)
Tabletop Mts. (37,968 acres)	South Maricopa Mountains (71,320 acres)

Baboquivari Peak wilderness should also include 3,245 acres of continuous state land that should be acquired by trade. I hope you also support it/vote for it. As a Phoenix resident for the past 24 years, I feel it is imperative that we set these areas aside to preserve the beauty of our fast deteriorating land.

Thank you,

  
J. Salty Honcharik

4405 N. Third Avenue  
Phoenix, AZ. 85013



3/24/85

Arizona Bureau of Land Management:

Please consider supporting  
all wilderness recommendations  
for Phoenix Rhd - namely,  
White Canyon, Mt. Wilson,  
Coyote Mts, Baboquivari Peak,  
Hell's Canyon & Picacho Mts  
& all of Lower Gila South  
EIS - namely, Little Horn Mts,  
Signal Mt., S. Maricopa Mts,  
(Butterfield Stage Memorial),  
Tabletop Mts, Woolsey Peak,  
New Water Mts, Eagletail Mts,  
East Clanton Hills, Face Mts  
& South Maricopa Mts.



Further may I recommend that you seriously acquire 3,245 acres of contiguous state land for Baboquivari Peak by trade.

Baboquivari Peak has not only ecology to preserve but an important cultural area for the Papago Indians to be preserved!

This tribe has given of its land close by with Kit Peak for scientific study, though on a profit basis. Let's reward & respect them!  
B.L.M. can repay

a culture by designating Baboquivari Peak & the additional land as a wilderness area.

These are all important for specific animals & plants. These wilderness areas will impact both ecological balances (for all of Ariz) & cities closely tied in Phoenix & Tucson.

My classroom children will be greatly enhanced with wilderness designation now!

Yes (2) support your integrity & decisions!

Sincerely,

James Taylor  
and Mr. Conservation Board 1983

2454 N. Tucson  
Tucson, Az 85745

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

3/23/85  
Box 675  
21560, AZ,  
P5003

Dear Sirs:

I am writing out of deep concern over below named wilderness areas in Arizona which are threatened and must be preserved for all of our well being:

White Canyon - copper production is immaterial compared to our need to preserve wild lands, small the the area convey be.

Ht. Wilcox - This area is known for its outstanding scenic value as well as providing excellent opportunities for solitude (a vanishing resource these days) and provides a crucial habitat for Bighorn Sheep.

Coyote Mts. - Smaller in size is an outstanding consideration the Covary Chert of these Mts. - 80% of special status wild life species, of protected plant species 250 culturally sensitive areas containing a classed period Hohokam clodian compend.

Bobquivari Peak - is a strongly uncommon the entire with as wilderness - this is a popular hiking & climbing area, a major part to the Spring condens an abundance of wild life proliferates, with outstanding unathal qualities, the addition is that it is essential to preserve Scott Canyon & the Picacho Mts., Little Horn Mts., Sigat Mts., N. Haricopa Mts.

I urge you to strongly consider these requests. Chc

must never forget the eternal value of wilderness which was so long in the waiting & can be so quickly destroyed and lost forever.

Maintenance of natural lands are essential to the survival of man.

Thank you.

Sincerely,

Jara Traum

SARA TRAU

P.O. Box 50722  
 Tucson, AZ 85703  
 March 24, 1985

Dear Sam

With the recent release of your recommendations for the Phoenix and Sonoran Life-Site EIS wilderness designations, I feel some comment is necessary.


On the Phoenix EIS, though the White Canyon and Coyote Mountains areas may be small, they are still worthy of protection. Such portions of land are very valuable resources. Furthermore, given the poor demand for copper, the potential for copper production in White Canyon is nil. Beetopium Peak, owned to the Papago, should indeed be considered as a WSA - along with the contiguous 3,245 acres of adjacent land. Mt. Wilson, with its Aspen thicket and the Hell's Canyon and Picacho Mountains area should also be preserved as WSA's.

Of the areas in the Lower Sonoran South EIS, the Little Horn Mountains,

including the Little Horn Mountain West should be provided as a habitat for big game and one with unique volcanic features. It should be particularly protected from mining, as should the Signal Mountain area, like the closely adjoining Woolly Peak area.

The intrusion of off-road vehicles into the North Mountain Mountains / Battleground Subage Mountains area should be stopped by WSA designation. Finally, I also suggest protection of the Tubbs, New Water, English and South Mountain Mountains, Fern Mountain and East Chino Hills area.

As someone who recognizes the need for dialogue but who feels this should not be done by destroying areas of unique beauty and with mine, I hope you will act favorably on these suggestions. Thank you for your attention.

Respectfully,  
  
 Sam S. Sachna  
 JACHNA

Dear Director of BLM, March 24, 1985

This letter is written to support the following areas to be protected as wilderness.

Phoenix EIS

- \* White Canyon (6,968 acres)
- \* Mt. Wilson (24,821 acres)
- \* Coyote Mountains (5,080 acres)
- \* Baboquivari Peak (2,065 acres)
- \* Hell's Canyon (9,379 acres)
- \* Picacho Mountains (6,400 acres)

Lower Gila South EIS

- \* Little Horn Mtns (90,430 acres)/  
Little Horn Mtns West (12,660 acres)
- \* Signal Mtn. (19,640 acres)
- \* North Maricopa Mtns (70,468 acres)  
Butterfield Stage Mtns (9,566 acres)
- \* Tabletop Mtns (37,968 acres)
- \* Woolsey Peak (73,930 acres)
- \* New Water Mtns (40,375 acres)
- \* Eagletail Mtns (117,065 acres)
- \* East Clanton Hills (36,560 acres)

-2-

- \* Face Mountain (27,575 acres)
- \* South Maricopa Mtns (71,320 acres)

Also Baboquivari Peak wilderness should also include 3,245 acres of contiguous state land that should be acquired by trade.

As a member of the Sierra Club, Tucson Desert Museum and Southern Arizona Road Runner's Club I am in favor of all wilderness and in the preservation of wildlife and desert plants. Too often people forget about the quality of Arizona which has sustained Arizona. I would be interested in the outcome of BLM wilderness issues. Thank you.

4536 E. 17th  
Tucson, Az. 85711

Respectfully,  
Peggy Ann Doty



March 25, 1985

Pg. 2

PHOENIX District BLM  
 2815 W. Deer Valley Road  
 Phoenix, AZ 85027

It will prove to be a far more valuable resource than any minerals that may be discovered in these areas, if the wildlife and wilderness ~~are~~<sup>are</sup> left untouched.

Dear BLM:

Thank you.

We are presently observing and photographing the wildlife and scenery in the vicinity of Signal Mountain and Woolsey Mountain, consisting of 19,640 acres.

Sincerely,

Dianne M. Zalko  
 Naturalist

Joseph Zalko, Jr. J.T. Zalko, III  
 wildlife photography  
 Shelia Zalko

It would be devastating to the bighorn sheep, not to mention the various other species of wildlife and plantlife, if this land is not preserved.

Please continue to protect our beautiful wilderness, not only in the above-mentioned area, but also in the following areas:

- White Canyon
- Mt. Wilson
- Coyote Mountains
- Baboquivari Peak
- Hell's Canyon
- Pinalo Mountains

(over)

106

2407 N. Palomino Court  
Chandler, Arizona 85224  
March 23, 1985

Phoenix District Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Sir:

I support wilderness recommendations for the Phoenix EIS and the Lower Gila South EIS.

I am particularly interested in the Baboquivari Peak wilderness study area and support acquisition of the adjacent state land for wilderness designation.

It is important to me that as much wilderness area in Arizona as possible be preserved.

Thank you.

Sincerely,

Dorothy Lees Riddle

107

23 March 1985

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix AZ 85027

To whom it may concern,

It has been brought to my attention that your office is currently receiving public comment on the recent BLM recommendations for wilderness area designations.

I would like my voice to be heard in support of the following recommendations:

Maintaining 6,968 acres of wilderness in the White Canyon area.

Maintaining the full 24,821 acres of wilderness at Mt. Wilson important not only as a habitat for bighorn sheep, but for its scenic value and opportunity for solitude.

Preserving the scenic landscape of Coyote Mountains and designating the 5,080 acres as wilderness.

Preserving and expanding the Baboquivari Peak area by acquiring 3,245 acres of adjacent land east of the present 2,065 acres.

Maintaining the Hell's Canyon and Picacho Mountain areas as wilderness areas.

In addition I would like to see your Agency reverse its position on the Little Horn Mountains, Signal Mountain, and North Maricopa Mountains. All these areas are threatened by either mining development or the incursion of off-road vehicles.

I would also like to see the following areas maintained as wilderness: Tabletop Mountains, Woolsey Peak, New Water Mountains, Eagletail Mountains, East Clanton Hills, Face Mountain and the South Maricopa Mountains, all in the Lower Gila South region.

Sincerely,

Greg Barr  
1060 East Elm  
Tucson AZ 85719

106

Dear Sirs:

I, as a member of the Sierra Club, am writing to you in regards to the just released recommendations for wilderness designations for three groups of areas in Arizona.

I ask you to please designate the following areas for wilderness:

White Canyon (6,902 acres), even though this is a small area and moderately favorable for copper production this is also a unique area with its straight-walled canyons, intricate slick-rock maze.

Mt. Wilson (24,821 acres), this area besides its outstanding scenic value, challenging terrain, and excellent opportunities for solitude, is a crucial habitat for bighorn sheep. I feel this is a very important wilderness area that is unique to itself.

Coyote Mts. (5,080 acres), it hard to understand how the BLM is not recommending this area for WSA considering it contains granite domes reminiscent of Yosemite. In addition to that the area has 7 special wildlife species & 8 protected plant species, plus 250 culturally sensitive areas containing a classic prehistoric Indian compound.

~~Signal Mt. (19,140 acres). I'm glad to see this area has been reinstated as a WSA, after public outcry following the Innes Watt era. This is a very popular hiking area as well as a sacred peak to the Papago Indians. I strongly recommend this area along with the Hell's Canyon (9,329 acres) & the Picacho Mts. (6,400 acres) areas for wilderness designation. Please include 3,245 acres of contiguous state land to be acquired by trade in the Baboquivas Peak & Santa Rita Draft EIS.~~

Little Horn Mts (29,430 acres) Little Horn Mts West (12,600 acres) these areas are adjacent to the Eagle Tail Mts WSA, a proposed BLM wilderness area, and is contiguous to the Kofa Natl. Wildlife Refuge, this is an important habitat for both bighorn sheep and desert tortoise as well as its remarkable natural volcanic beauty.

Signal Mt. (19,140 acres), this area should be included as wilderness because of its proximity to Woolsey Badland and its the home of bighorn sheep & desert tortoise.

North Maricopa Mts (75,400 acres) & the Field Stone Memorial (9,000 acres) this is also a crucial habitat for the sheep & tortoise as well as including prehistoric rock shelters. This area is threatened by off-road intrusion, near the wildlife-rich riparian washes. Please designate these crucial areas also.

The Tabletop Mts (12,906 acres), Woolsey Peak (73,931), New Water Mts (40,325 acres), the Eagle-tail Mt. (112,065 acres), East Clinton Hills (36,500), Face Mt. (2,525 acres), & the South Maricopa Mts (7,342)

I hope you will take the time to really see how valuable and beautiful these areas are and will realize that if they are not now saved from destruction they may never again have a chance to survive its wilderness areas.

My children and yours will thank you for it. Believe me.

Sincerely,  
Thank you,  
John Pomperun

John F. Pomperun  
334 W. Highland St  
Phoenix, Az 85013

RECEIVED  
MAY 20 1978

Dear Mr. [unclear],  
My wife, Julie Hays, and I both strongly support wilderness recommendations:

1. White Canyon - South of Phoenix - 6,968 acres.
2. Mt. Wilson area - this area is a home for high-altitude species, 24,821.
3. Coyote Mtns. - 5,080 acres.
4. Baboquiviri Peak - Great place for a hike 2,065 acres.
5. Little Horn Mountains - 90,430 acres.
6. Signal Mountain - 19,640 acres.
7. North Maricopa Mountain - Butlerfield Stage Memorial.

We are Phoenix residents who enjoy the beauty & solitude of the Sonoran desert. Designating this area as wilderness will make sure we retain the wonderful place it is. Please act on these recommendations.

Sincerely,  
John Hays  
Julie Hays  
3507 A Terrace  
Phoenix, Az 85022

Randy Bryan  
3114 E. Blue Dr  
Phoenix, AZ 85016  
phone 956-0177

Dear Person(s),

I am an avid sportsman who enjoys the outdoors immensely. My family has resided in Arizona for four generations now. I have always relished the stories told to me by my relatives, of the beauty and vastness of the Arizona outdoors. ☺

I understand that you are considering a couple of areas that I frequent as wilderness areas. Baboquiviri Peak is one of the most spectacular pieces of Rock in the state of Arizona. Not only have I climbed many of <sup>its</sup> Rock walls

but one winter after a severe storm, we ice climbed the Forbes route to the summit.

As a biologist, I enjoy the diversity of habitats offered in the <sup>4 mi</sup> hike from the base to the summit. Sonoran desert → oak chaparral → Pinon-Juniper → Ponderosa Pine → Aspen and Douglas fir. Truly Spectacular!

I understand the area was dropped by James Watt in the 1982 review. I believe that it should be a wilderness area and could be enhanced by the addition of state lands adjacent to Baboquiviri Peak. I urge and support you to acquire such lands ~~and~~ and ensure this unique and spectacular area remains as such by converting them to wilderness.  
sincerely  
Randy Bryan

111

March 26, 1985  
Steward Observatory  
The University of Arizona  
Tucson, AZ 85721

District Manager, Marlyn Jones  
Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Dear Ms. Jones,

I have recently reviewed the Phoenix District BLM's Draft Environmental Impact Statement and I am amazed that out of the hundreds of thousands of acres of land managed by the bureau in the Phoenix study area only 2065 are considered worthy of new wilderness designation. I have been to half of the six areas considered for wilderness designation in the Environmental Impact Statement and feel that in view of their highly scenic character and the presence of fragile populations of both flora and fauna all three areas deserve wilderness designation. In addition, two of these areas (Coyote Mountains and Baboquivari Peak) to my knowledge contain sensitive artifacts which are an important part of our cultural heritage. It is my belief that wilderness designation would help to protect these artifacts. From reading the EIS I have also come to the opinion that the remaining three areas considered exhibit similar natural beauty and contribute in a similar way to our natural and cultural heritage. I must say that while short term profits can be made by despoiling these lands through multiple use I feel that the long term profits gained through preserving these six areas as wilderness will be much greater. I strongly

support the All Wilderness alternative presented in the EIS. Additionally, since the BLM plans to acquire 3245 acres of state land east of the Baboquivari Peak Wilderness Study Area, I feel that this land too should be given wilderness designation, enlarging the size of this relatively small wilderness unit. Thank you for your time.

Sincerely,

*Michael Margulis*  
Michael Margulis

44-1571-100-100  
WVBS 0 10R2 64  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT  
MARGULIS

112

3/25/85

To whom it may concern,

I am writing to you in support of wilderness recommendations for the following areas:

White Canyon (6,968 acres), Mt Wilson (24,821 ac), Coyote Mtn (5,280 ac), Baboquivari Peak (2,065 ac + 3,245 acres of contiguous state land that should be acquired by track), Hell's Canyon (9,379 acres), Picacho Mtns, Little Horn Mtns (West), Signal Mtns, North Maricopa Mtn, Buttenfield Stage Monument, Tabletop Mtn, Woolsey Peak, New Water Mtns, Eagletail Mtns, East Clenden Hills, Face Mtns and South Maricopa Mtns.

These areas are a spectacular part of the Sonoran desert and must be preserved.

Thank you for your time.

Sincerely yours,

D Scott Samuels

BOBA & SCOTT SAMUELS  
2007 N. FARMERS  
TUCSON, ARIZONA 85718

3/25/85

To whom it may concern,

DANA & SCOTT SAMUELS  
2001 N. THUNDER  
TUCSON, ARIZONA 85745

I am writing to you in support of wilderness recommendations for the following areas:

White Canyon (6,968 acres), Mt Wilson (24,821 acres) Coyote Mountain (5,000 acres)

Pabogiviari Peak (2,065 acres, + 3,245 acres of contiguous states land that should be acquired by trade)

Hells Canyon (9,329 acres), Piñacho Mtns (6,400 acres), Little Horn Mountains (? West), Signal Mtn, North Maricopa Mtn, Butterfield Stage Memorial, Tabletop Mtns, Woolsey Peak, New Water Mtns, Eagle Land Mtns, East Clanton Hills, Face MT.,

and South Maricopa Mountains  
These areas are a spectacular part of the Sonoran desert and must be preserved,

Thank you for your time.

Dana Newman-Samuels



Phoenix District BLM  
2015 W. Deer Valley  
Phoenix, AZ  
86007

Dear Sirs:

The purpose of this letter is to voice our support for the following wilderness recommendations

White Canyon	Tabletop Mts
Mt. Wilson	Woolsey Peak
Coyote Mountains	New Cater Mts.
Babouivari Peak	Eagletail Mts.
Hell's Canyon	East Clanton Hills
Picacho Mountains	Face Mt.
Little Horn Mts	South Maricopa Mt.
Signal Mt.	Butterfield Stage
North Maricopa Mts.	Little Horn Mts. West

Thank You

Eddie Bennett  
Karen M. Bennett

30-230 SAC  
FLAG, AZ, 86001

2005

Mary Sojourner  
15 Menlo Place, Rochester NY 14620  
(716) 271-4393  
14 N. Bonito, Flagstaff, AZ. 86001

March 26, 1985

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, AZ. 86007

I would like to register strong support for wilderness recommendations for: White Canyon, Mt. Wilson, Coyote Mountains, Babouivari Peak, Hell's Canyon, the Picacho Mt area, Little Horn Mts + Little Horn Mts. W, Signal Mt., North Maricopa Mts., Butterfield Stage Memorial, Tabletop Mts, Woolsey Peak, New Water Mts, Eagletail Mts., East Clanton Hills, Face Mountain and North Maricopa Mts. Arizona is a state of miraculous beauty — truly a national treasure — it must not be further damaged.

Also, the Babouivari Peak wilderness should include the 3,245 acres of contiguous state land, to be acquired by trade.

Sincerely,

Mary Sojourner  
602-774-8601

116

P.O. Box 613  
Cave Creek  
AZ 85331  
March 25, 1985

Phoenix District BLM

We are glad to learn that the BLM plans to acquire 3,245 acres of state land which will enlarge the proposed Baboquivari Park wilderness area.

We wish to support wilderness status for the USA's of MT Wilson, the Coyote Mountains, White Mountain, Little Horn Mountains and Little Horn Mountains West, the N. Maricopa Mountains, Butterfield Stage Memorial, and Signal Mountain.

Each of these areas, as you know, has many unique features which qualify it for wilderness protection. We do encourage you to make such recommendations.

2.

With the rapidly expanding population in Arizona, and the enormous increase in the use of destructive off-road vehicles in recent years, it is important to act before it is too late. Our wilderness areas are one of the most valuable legacies we can leave to future generations.

Yours sincerely,

Flynn C. & Jeanne Kelly

117

2/24

DEAR PLM,  
I AM WRITING TO EXPRESS MY STRONG SUPPORT  
FOR WILDERNESS AREAS BEING DESIGNATED TO THE FOLLOWING  
AREAS:

PHOENIX EIA

WHITE CANYON	PICACHO MOUNTAINS
Mt WILSON	COYOTE MOUNTAINS
HILLS CANYON	PASSO DELINANTE PEAK

LOWER GILA SOUTH EIA

TABLETOP MOUNTAINS	FACE MOUNTAINS
SIGNAL MOUNTAIN	CABLETAIN MOUNTAINS
N. MARIQUITA MTS/PUMPERNICUS SPRING	WOOLSEY PEAK
LITTLE HORN MOUNTAIN/LITTLE H. W.	NEW HATHE MOUNTAIN
SOUTH MARIQUITA MOUNTAINS	EAST CLINTON HILL

Arizona WILDERNESS THINGS BE PRESERVED ~~AND~~  
FOR JOYFUL PURSUITS AND TO PROTECT WILDLIFE. ALLOWING  
COMMERCIAL DEVELOPMENT OF THESE AREAS WOULD BE A BIG  
MISTAKE.

Sincerely,  
Cathy Klein  
CATHY KLEIN  
6702 N. 11 AVE.  
PHOENIX, AZ 85013

118

MR. RICHARD FAITH  
4002 RD. CARRETO ESTE  
TUCSON AZ 85716

Phoenix District BLM  
2015 W. Deer Valley Rd.  
Phoenix, Az. 85027

Dear Sirs:

Please accept my support for the  
protection of the following -

White Canyon

Mt. Wilson

Coyote Mountains

Little Horn Mountain

Signal Mountains

North Maricopa Mountain

Tabletop Mtn.

South Maricopa Mtn.

Rabopini Peak

Hells Canyon

Picacho Mtn.

Woolsey Peak

New Hathe Mtn.

EagleDail Mtn.

East Clinton Hills

Face Mountain

Thank you, Richard Faith

FOUR CORNERS WILDERNESS WORKSHOP  
P.O. Box 103  
Flagstaff, AZ 86002

*L.H.*  
L. H. Chatham  
1322 S. Camino del Sol  
Green Valley, AZ 85614

March 26, 1985

Dear Sirs

I've urge you to recommend  
for wilderness designation  
the following areas: White  
Canyon, Coyote Mountains,  
Baboquivari Peak, Mt Wilson,  
Little Horn Mountains & Little  
Horn Mountains west & North  
Maricopa Mountains.

We are fairly new Arizona  
residents but deeply concerned  
for the preservation of wilderness  
areas & wildlife habitats.

Sincerely

Mrs & Mrs L. H. Chatham  
1322 S. Camino del Sol  
Green Valley AZ 85614

Phoenix District BLM  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Gentlemen:

Our group supports the recommendations of the Sierra Club concerning wilderness as represented in the Phoenix EIS. We do not feel that supposed mineral, oil or gas values should take precedence over the many natural and scientific values found in these areas.

I, myself, have examined the following areas under consideration and have made some short reports about them to you.

The Woolsey Peak area is a prime desert area within easy access of Phoenix. It is a good area for hiking in winter when few other areas are available for such use.

The Signal Mountain (Recommended 19640 acres) and Face Mountain (Recommended 27575 acres) are also in the Gila Bend Mountains and deserving of wilderness status.

I also previously made a report on the New Water Mountains area just north of the Kofa National Wildlife Refuge. This is an important wildlife and scenic area. Special attention should be given to Dripping Springs which has been eliminated from this area. It is an important prehistoric site with a number of fine petroglyphs which need special protection.

The prominent landmark, Baboquivari Peak, which dominates southern Arizona and is important to the Papagos certainly needs wilderness protection for the 2065 acres of BLM and 3245 acres of contiguous state land.

We support Sierra Club recommendations on other areas for wilderness status as follows:

White Canyon (6,368 acres)	Hells Canyon (9,379 acres)
Mt. Wilson (24,821 acres)	Picacho Mountains (6,400 acres)
Coyote Mountains (5,080 acres)	Little Horn Mountains (90,430 acres)/
North Maricopa Mountains (70,468 acres)/Butterfield Stage Memorial (9,566 acres)	Little Horn West (12,660 acres)
East Clanton Hills (36,650 acres)	Tabletop Mountains (37,968 acres)
	EagleTail Mountains (117,065 acres)
	South Maricopa Mountains (71,320 acres)

121

Thank you for this opportunity to comment.

Sincerely yours,

*Donavon H. Lyngholm*

Donavon H. Lyngholm  
Secretary



*Mar. 23, 85*

*Dear Sirs,*

*I am very concerned over B.L.M.'s lack of support in designating the Mr. Wilson area (here in Mohave County) a wilderness area. This is truly a unique & important wilderness area, especially since bordered on 3 sides by Lake Mead NRA.*

*Hunting & mining & trapping & grazing are all allowed within Lake Mead NRA already — to the detriment of the majority of public users of the area. We should have one area that is truly protected in our County!*

*Sincerely,  
Mary Mc Bea  
Eq 186  
Needham, Ca. 96444*



# APPENDICES





# APPENDIX 1

## DIVERSITY IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM

### Ecosystem Diversity

The Bailey-Kuchler system (Kuchler and Bailey 1978) was used to classify all existing and potential units of the National Wilderness Preservation System (NWPS) into ecotype/landform types. It can be determined, using this classification, whether a potential unit could expand the ecotype/landform diversity of the NWPS.

The Bailey-Kuchler system uses elevation, rainfall and temperature to describe potential natural vegetation. Appendix Table 1 shows the Bailey-Kuchler potential natural vegetation types within each WSA. Appendix Table 2 describes these vegetation types as they are represented in

designated wilderness, administratively endorsed wilderness, and areas under wilderness review.

### Solitude or Primitive Recreation Diversity

The FEIS area lies within a day's driving time (5 hours) of three standard metropolitan statistical areas (SMSAs) as defined by the Bureau of the Census. The SMSAs are Phoenix and Tucson, Arizona and Las Vegas, Nevada. Currently designated and administratively endorsed wilderness areas are within a day's driving time of all three

**TABLE 1**  
**WSA ACRES BY VEGETATION TYPES**  
Bureau of Land Management, Phoenix District, Arizona

WSA	Creosote Bush	Creosote Bush-Bursage	Palo Verde-Cactus Shrub	Oak-Juniper Woodland	Grama-Tobosa Shrub Steppe
Mount Wilson	24,821	—	—	—	—
Hells Canyon	—	—	9,379	—	—
White Canyon	—	4,288	—	—	2,680
Picacho Mountains	—	—	6,400	—	—
Coyote Mountains	—	4,060	—	—	1,020
Baboquivari Peak	—	—	—	1,065	1,000

SOURCE: Phoenix District files

**TABLE 2**  
**EXISTING AND POTENTIAL REPRESENTATIONS OF ECOSYSTEM TYPES**  
Bureau of Land Management, Phoenix District, Arizona

Bailey-Kuchler Vegetation Type	Statutory Wilderness		Administratively Endorsed for Wilderness by the President		Potential Sources of Representation—Areas Under Study*	
	No. Areas	Acres	No. Areas	Acres	No. Areas	Acres
Creosote Bush	2	312,965	4	1,896,740	133	3,988,813
Creosote Bush-Bursage	5	344,217	3	430,150	48	1,401,259
Palo Verde-Cactus Shrub	4	265,450	3	847,600	41	1,396,142
Oak-Juniper Woodland	7	198,617	0	0	11	116,974
Grama-Tobosa Shrub Steppe	3	55,896	0	0	15	79,239

\*Includes areas being studied for wilderness by the Forest Service, Fish and Wildlife Service, National Park Service, and Bureau of Land Management.

SOURCE: BLM, Profile 2, Wilderness Diversity Computer Reports, Phoenix District files

SMSAs. Appendix Table 3 gives a breakdown of the number of areas providing solitude or primitive recreation opportunities.

### Geographic Diversity

Designated and administratively endorsed wilderness areas are well distributed within Arizona and the region.

Appendix Table 4 shows the acreage of designated and administratively endorsed wilderness and of areas under study in Arizona and the southwest region. For the most part the region considered in this analysis encompasses areas within approximately 300 miles of Phoenix, Arizona. Appendix Table 5, shows the geographic distribution of wilderness in the southwestern United States by state, number of areas, and acreage. For designated and administratively endorsed wilderness in Arizona see Appendix Tables 6 and 7.

**TABLE 3**  
**AREAS WITH SOLITUDE OR PRIMITIVE RECREATION OPPORTUNITIES\***  
Bureau of Land Management, Phoenix District, Arizona

SMSA	Status	No.	Acres	States	Administering Agency*
Phoenix	Designated	37	2,064,835	AZ, CA, NM	FS, NPS, BLM
	Endorsed	4	1,318,710	AZ	BLM, FS, FWS
	Study	72	3,143,139	AZ, CA, NM	BLM, FS, NPS
Tucson	Designated	33	2,038,095	AZ, NM	FS, NPS, BLM
	Endorsed	3	1,316,200	AZ	BLM, FS, FWS
	Study	61	1,525,640	AZ, NM	BLM, FS
Las Vegas	Existing	15	1,309,288	AZ, CA	FS, NPS, CAL, BLM
	Endorsed	25	4,679,481	AZ, CA, NV, UT	FS, NPS, FWS
	Study	253	10,607,984	AZ, CA, NV, UT	BLM, FS, NPS, CAL

\*Within a day's drive of Phoenix, Tucson, and Las Vegas SMSAs

\*\* BLM — Bureau of Land Management      FWS — Fish and Wildlife Service      CAL — State of California  
 FS — Forest Service      NPS — National Park Service

SOURCE: BLM, Profile 2, Wilderness Diversity Computer Reports, Phoenix District files

**TABLE 4**  
**GEOGRAPHIC DISTRIBUTION OF WILDERNESS**  
**AND POTENTIAL WILDERNESS IN ARIZONA**  
Bureau of Land Management, Phoenix District, Arizona

	BLM		FS		FWS		NPS		ST (CAL)		Total	
	No.	Acres	No.	Acres	No.	Acres	No.	Acres	No.	Acres	No.	Acres
Arizona												
Designated	8	286,270	35	1,288,085	0	—	4	431,550	0	—	47	2,005,905
Endorsed	0	0	0	0	4	1,318,710	0	—	0	—	4	1,318,710
Study	72	2,100,135	3	67,930	0	—	0	—	0	—	75	2,168,065
Region												
Designated	8	286,270	43	2,220,580	0	—	5	898,790	16	310,610	72	3,716,250
Endorsed	0	0	13	171,582	5	2,761,810	3	156,624	0	—	21	3,090,016
Study	258	8,112,950	14	193,636	0	—	15	877,930	0	—	287	9,184,516

BLM — Bureau of Land Management      FWS — Fish and Wildlife Service      ST — State Administered  
 FS — Forest Service      NPS — National Park Service      Wilderness (California)

SOURCE: BLM, Profile 2, Wilderness Diversity Computer Reports, Phoenix District files

**TABLE 5**  
**GEOGRAPHIC DISTRIBUTION—SOUTHWESTERN UNITED STATES**  
 Bureau of Land Management, Phoenix District, Arizona

Type of Area	BLM		FWS		USFS		NPS		STATE		TOTAL	
	No. Areas	Acres	No. Areas	Acres	No. Areas	Acres	No. Areas	Acres	No. Areas	Acres	No. Areas	Acres
Arizona												
Existing	8	286,270	0	0	35*	1,288,085	4	431,550	0	0	47	2,005,905
Endorsed	0	0	4	1,318,710	0	0	0	0	0	0	4	1,318,710
Study	72	2,100,135	0	0	3	67,930	0	0	0	0	75	2,168,065
California												
Existing	0	0	0	0	3	72,295	1	467,240	16	310,610	20	850,145
Endorsed	0	0	0	0	9	65,700	0	0	0	0	9	65,700
Study	109	3,831,654	0	0	7	75,400	0	0	0	0	116	3,907,054
Nevada												
Existing	0	0	0	0	0	0	0	0	0	0	0	0
Endorsed	0	0	1	1,443,100	0	0	0	0	0	0	1	1,443,100
Study	22	894,711	0	0	0	0	14	252,000	0	0	36	1,146,711
Utah												
Existing	0	0	0	0	0	0	0	0	0	0	0	0
Endorsed	0	0	0	0	4	105,882	3	156,624	0	0	7	262,506
Study	29	753,554	0	0	0	0	1	625,930	0	0	30	1,379,484
New Mexico												
Existing	0	0	0	0	5	860,200	0	0	0	0	5	860,200
Endorsed	0	0	0	0	0	0	0	0	0	0	0	0
Study	26	532,896	0	0	4	50,306	0	0	0	0	30	583,202
Region												
Existing	8	286,270	0	0	43	2,220,580	5	898,790	16	310,610	72	3,716,250
Endorsed	0	0	5	2,761,810	13	171,582	3	156,624	0	0	21	3,090,016
Study	258	8,112,950	0	0	14	193,636	15	877,930	0	0	287	9,184,516

\*Includes one BLM area (8,850 acres) in Kanab Creek

BLM — Bureau of Land Management

FWS — Fish and Wildlife Service

USFS — U.S. Forest Service

STATE — State of California

SOURCE: BLM, Profile 2, Wilderness Diversity Computer Reports, Phoenix District files

**TABLE 6**  
**DESIGNATED WILDERNESS IN ARIZONA**

Bureau of Land Management,  
Phoenix District, Arizona

Wilderness Areas	Acreage	Managing Agency
Apache Creek	5,420	U.S. Forest Service
Cedar Bench	14,950	U.S. Forest Service
Chiricahua	87,700	U.S. Forest Service
Bear Wallow	11,080	U.S. Forest Service
Castle Creek	26,030	U.S. Forest Service
Escudilla	5,200	U.S. Forest Service
Fossil Springs	11,550	U.S. Forest Service
Four Peaks	53,500	U.S. Forest Service
Galiuro	76,317	U.S. Forest Service
Granite Mountain	9,800	U.S. Forest Service
Hellsgate	36,780	U.S. Forest Service
Juniper Mesa	7,600	U.S. Forest Service
Kachina Peaks	18,200	U.S. Forest Service
Kendrick Mountain	6,510	U.S. Forest Service
Mazatzal	251,707	U.S. Forest Service
Miller Peak	20,190	U.S. Forest Service
Mt. Wrightson	25,260	U.S. Forest Service
Mount Baldy	6,975	U.S. Forest Service
Munds Mountain	18,150	U.S. Forest Service
Pajarita	7,420	U.S. Forest Service
Pine Mountain	20,478	U.S. Forest Service
Pusch Ridge	56,510	U.S. Forest Service
Red Rock-Secret Mountain	43,950	U.S. Forest Service
Rincon Mountain	38,590	U.S. Forest Service
Salome	18,950	U.S. Forest Service
Salt River Canyon	32,800	U.S. Forest Service
Santa Teresa	26,780	U.S. Forest Service
Sierra Ancha	20,850	U.S. Forest Service
Strawberry Crater	10,140	U.S. Forest Service
Superstition	159,756	U.S. Forest Service
Sycamore Canyon	55,942	U.S. Forest Service
West Clear Creek	13,600	U.S. Forest Service
Wet Beaver	6,700	U.S. Forest Service
Woodchute Wilderness	5,600	U.S. Forest Service
Kanab Creek	77,100	U.S. Forest Service/ Bureau of Land Mgmt.
Aravaipa Canyon	6,670	Bureau of Land Mgmt.
Beaver Dam Mountains	19,600	Bureau of Land Mgmt.
Cottonwood Point	6,500	Bureau of Land Mgmt.
Grand Wash Cliffs	36,300	Bureau of Land Mgmt.
Mt. Logan	14,600	Bureau of Land Mgmt.
Mt. Trumbull	7,900	Bureau of Land Mgmt.
Paiute	84,700	Bureau of Land Mgmt.
Paria Canyon- Vermillion Cliffs	110,000	Bureau of Land Mgmt.
Chiricahua National Monument	10,290	National Park Service
Organ Pipe National Monument	299,600	National Park Service
Petrified Forest	50,260	National Park Service
Sahuaro National Monument	71,400	National Park Service
<b>TOTAL</b>	<b>2,005,905</b>	

**TABLE 7**  
**ADMINISTRATIVELY ENDORSED  
WILDERNESS STUDY AREAS IN ARIZONA**

Bureau of Land Management,  
Phoenix District, Arizona

Wilderness Areas	Acreage	Managing Agency
Imperial National Wildlife Refuge	1,600	U.S. Fish & Wildlife Svc.
Cabeza Prieta National Wildlife Refuge	744,000	U.S. Fish & Wildlife Svc.
Havasu National Wildlife Refuge	2,510	U.S. Fish & Wildlife Svc.
Kofa	570,600	U.S. Fish & Wildlife Svc.
<b>TOTAL</b>	<b>1,318,710</b>	

SOURCE: BLM, Profile 2, Wilderness Diversity Computer Re-ports, Phoenix District files

## APPENDIX 2

TABLE 8  
1982 EMPLOYMENT BY COUNTY  
Bureau of Land Management, Phoenix District, Arizona

	Mohave		Yavapai		Maricopa		Pima		Pinal		5-County Totals	
	Persons	%	Persons	%	Persons	%	Persons	%	Persons	%	Persons	%
Proprietors (Farm & Non-Farm)	2,582	15	3,849	18	53,680	7	17,215	8	2,717	9	80,043	8
Farm	113	1	179	1	5,716	1	590	1	2,369	7	8,967	1
Agriculture Services & Forestry	44	1	79	1	7,002	1	898	1	1,501	5	9,524	1
Mining	288	2	1,054	5	456	1	4,555	2	5,643	18	11,996	1
Construction	934	5	985	5	44,304	6	11,855	5	523	2	58,601	6
Manufacturing	2,101	12	1,908	9	111,522	15	25,863	12	2,479	8	143,873	14
Transportation & Utilities	942	5	861	4	32,191	4	8,731	4	906	3	43,631	4
Wholesale Trade	275	2	248	1	40,112	5	5,871	3	492	2	46,998	5
Retail Trade	3,717	21	4,170	18	129,083	17	36,853	17	3,180	10	177,003	17
Finance, Insurance, & Real Estate	674	4	769	4	50,834	7	8,839	4	619	2	61,735	6
Services	2,713	15	3,474	16	149,746	20	46,696	21	3,176	10	205,805	20
Government	3,171	17	4,210	18	114,707	16	47,745	22	8,037	24	177,870	17
TOTALS	17,554	100	21,786	100	739,353	100	215,711	100	31,642	100	1,026,046	100

SOURCE: Regional Economic System, Bureau of Economic Analysis

## APPENDIX 3

**TABLE 9**  
**1982 EARNINGS BY INDUSTRY (IN THOUSANDS)**  
 Bureau of Land Management, Phoenix District, Arizona

	Mohave		Yavapai		Maricopa		Pima		Pinal		5-County Totals	
	Earnings	%	Earnings	%	Earnings	%	Earnings	%	Earnings	%	Earnings	%
Farm	13,486	6	7,919	3	143,713	1	4,910	1	20,619	4	190,647	1
Agriculture, Services & Forestry	600	1	835	1	71,002	1	12,303	1	10,611	2	95,351	1
Mining	9,096	4	26,939	9	10,138	1	157,747	4	169,386	34	373,306	2
Construction	16,170	6	20,035	7	1,053,794	8	225,412	6	11,075	2	1,326,486	8
Manufacturing	41,955	17	34,477	12	2,671,980	20	644,927	18	47,815	10	3,441,154	19
Transportation & Utilities	19,186	8	22,201	8	885,272	7	233,770	7	21,038	4	1,181,467	7
Wholesale Trade	5,204	2	4,847	2	892,911	7	115,379	3	8,904	2	1,027,245	6
Retail Trade	37,844	16	43,318	15	1,512,637	12	395,702	11	34,524	7	2,024,025	12
Finance, Insurance, & Real Estate	11,613	5	12,770	4	984,675	8	150,218	4	9,730	2	1,169,006	7
Services	35,714	15	50,334	17	2,558,201	19	719,686	21	39,130	8	3,403,065	19
Government	47,577	20	66,935	22	1,998,564	16	848,054	24	121,029	25	3,082,159	18
<b>TOTALS</b>	<b>238,445</b>	<b>100</b>	<b>290,610</b>	<b>100</b>	<b>12,782,887</b>	<b>100</b>	<b>3,508,108</b>	<b>100</b>	<b>493,861</b>	<b>100</b>	<b>17,313,911</b>	<b>100</b>

SOURCE: Regional Economic System, Bureau of Economic Analysis

## APPENDIX 4

BLM is mandated by Congress to play a stewardship role in the preservation of cultural values on public land and will continue to manage cultural resources for their cultural values. Certain significant sites or areas may be protected and preserved for future use as funds become available.

The following measures apply to all actions in the EIS area involving ground disturbance or transfer of title. Before proposals involving surface disturbance or transfer of title are approved, site-specific cultural resource evaluations will be completed within areas which have not been previously evaluated for cultural remains. A Class I literature review, as well as a Class III intensive field inventory or an adequate Class II sample survey will be conducted as appropriate (BLM Manual 8111).

If any historic or archaeological properties are found, their eligibility for inclusion in the *National Register of Historic Places* will be determined in consultation with the

SHPO (36 CFR 1204). Whenever feasible, BLM will avoid impacts to cultural resources by redesigning or relocating the project. If impacts are unavoidable, BLM will consult with the SHPO to develop mitigating measures to reduce or eliminate adverse impacts to cultural resources. BLM will consult with the Advisory Council on Historic Preservation as appropriate in accordance with 36 CFR 800. In addition, BLM will consult with appropriate Native American groups with aboriginal or historic ties to lands within project areas. Impacts to cultural resources will be mitigated before project construction begins. If buried cultural remains are found during construction, the construction will stop and BLM will be notified. *BLM Manual 8141* (Arizona Supplement) provides details on agency-specific guidelines for both long-term and interim physical and administrative protection of cultural resources. These measures will ensure compliance with the *National Historic Preservation Act of 1966* and the *National Environmental Policy Act of 1969*.

STANDARD

REQUIREMENTS

FOR THE



**GLOSSARY,  
REFERENCES,  
AND INDEX**



## GLOSSARY

The following abbreviations are used in this EIS. Those abbreviations that represent terms are defined in the glossary.

ACEC	area of critical environmental concern
AG&FD	Arizona Game and Fish Department
AMP	allotment management plan
APS	Arizona Public Service
AUM	animal unit month
BLM	Bureau of Land Management
BR	Bureau of Reclamation
EIS	environmental impact statement
ESA	economic study area
FWS	Fish and Wildlife Service
HMAP	herd management area plan
HMP	habitat management plan
MFP	management framework plan
MSA	management situation analysis
ORV	off-road vehicle
RMP	resource management plan
SMSAs	Standard Metropolitan Statistical Areas
USGS	U.S. Geological Survey
VRM	visual resource management
WSA	wilderness study area

### TERMS

- ACTIVITY PLANNING.** Site-specific planning which precedes actual development. This is the most detailed level of BLM planning.
- ADJUDICATION.** The legal processing of applications, entries, and claims to assure compliance with the public land laws and regulations.
- ADMINISTRATIVELY ENDORSED WILDERNESS AREA.** An area that the President of the United States has recommended to Congress as suitable for wilderness designation.
- AGGLOMERATE.** A rock composed largely or entirely of angular volcanic fragments held together in a matrix.
- AIR QUALITY CLASSES.** Classes established by the Environmental Protection Agency to define the amount of air pollution considered significant within an area. Class I applies to areas where almost any change in air quality would be considered significant; Class II applies to areas where the deterioration normally accompanying moderate well-controlled growth would be considered insignificant; and Class III applies to areas where deterioration up to the national standards would be considered insignificant.
- ALLOTMENT.** A land area where one or more operators' livestock graze. It generally consists of public land but may include parcels of private and state-owned lands. The number of livestock and the season of use are stipulated for each allotment.
- ALLOTMENT MANAGEMENT PLAN (AMP).** A BLM livestock grazing management plan for a specific allotment, based on multiple use resource management objectives. The AMP considers livestock grazing in relation to other uses of the range and in relation to renewable resources—watershed, vegetation, and wildlife. An AMP establishes the seasons of use, the number of livestock to be permitted on the range, and the rangeland developments needed.
- ALLUVIAL.** Pertaining to sediments transported and deposited by water.
- ALLUVIAL FAN.** A sloping, fan-shaped mass of sediment deposited by a stream where it emerges from an upland onto a plain. See Bajada.
- ALLUVIUM.** Unconsolidated rock or soil material deposited by running water, including gravel, sand, silt, clay, and various mixtures of these.
- ANDESITE.** A light-colored volcanic rock.
- ANIMAL UNIT MONTH (AUM).** The amount of forage needed to sustain one cow or its equivalent for 1 month.
- ANNUAL (EPHEMERAL) PLANT.** A plant that completes its life cycle and dies in one year or less (Range Term Glossary Committee, 1974).
- AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC).** With ACEC status public land is managed to prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes. To be designated an ACEC, an area must be of national or international significance and must be threatened by adverse change—a reduction or loss of values—unless special management attention is applied.
- ARIZONA NATURAL HERITAGE PROGRAM.** A cooperative effort of the Nature Conservancy and the Arizona Game and Fish Department to maintain Arizona's biological diversity by collecting, analyzing, and disseminating information on the populations and distributions of plants and animals of special interest in the state. Being studied are Arizona species that are poorly understood and species with low populations or limited distribution within Arizona.
- ARROYO.** A small steep-sided and usually dry water course with a flat floor.
- ASPECT (VEGETATION).** The appearance that a dominant or most common species of vegetation gives to the viewer.
- AUTHORIZED GRAZING PREFERENCE (QUALIFICATIONS).** The total number of AUMs that livestock annually are allowed to graze on public lands. Preference is apportioned and attached to base waters or property owned or controlled by a permittee or lessee.
- BAILEY-KUCHLER SYSTEM.** A classification system that divides the United States into ecosystems based on climate, vegetation, soils, and landform.
- BAJADA.** A broad, gently inclined slope at the foot of a mountain, formed by the coalescing of alluvial fans.
- BASALT.** A dark rock, usually of volcanic origin.
- BURRO HERD.** One or more jacks (male burros) and their jennies (females).

- BURRO HERD AREA.** The area used by free-roaming burros during their yearly movements to obtain biological requirements; the area occupied by wild free-roaming burros at the passage of the Act of December 15, 1971 and limited to that area by the act, not to be expanded by the relocating of animals.
- BURRO USE AREA.** An area currently being used by burros. See Burro Herd Area.
- CARRYING CAPACITY (GRAZING CAPACITY).** The greatest stocking rate possible without damaging vegetation or related resources. It may vary from year to year in the same area because of fluctuating forage production (Range Term Glossary Committee, 1974).
- CHAPARRAL.** A vegetation type of dense brush and shrubs, which in the EIS area occurs between 4,000 and 7,000 feet in elevation and is associated with the following plants: mountain mahogany, shrub live oak, desert ceanothus, cliffrose, manzanita, skunkbush, shrubby buckwheat, and desert needlegrass. Chaparral provides significant forage and cover for wildlife and livestock.
- CHERRYSTEM ROAD.** A dead-end road extending into and surrounded by a wilderness study area (WSA) but not within its boundaries. Such roads may lead to range developments, mines, or inholdings. Cherrystemming is the delimiting of WSAs to exclude a cherrystem road, developments, or other uses not compatible with wilderness.
- CRITICAL MINERALS.** Minerals essential to the national defense of the United States, which, though difficult to procure, are easier to procure than strategic minerals because they can be domestically produced, obtained in more adequate quantities, or are less essential than strategic minerals. Nevertheless, critical minerals need some degree of conservation and distribution control. See Strategic Minerals.
- CRITICAL WILDLIFE HABITAT.** That part of the habitat of a federally threatened or endangered wildlife species that is essential to its survival and perpetuation.
- CRUCIAL WILDLIFE HABITAT.** That part of the habitat of a wildlife species that is essential to its survival and perpetuation as a population.
- CULTURAL RESOURCE INVENTORY CLASSES.**
- Class I—library, archival, and literature research with consultation to identify known cultural resources.
  - Class II—a field inventory of an area, systematically designed to provide a predictive model of the nature and distribution of the cultural resources in the area.
  - Class III—an intensive field search of all surface-evident cultural resources for an entire area.
- CULTURAL RESOURCES.** Those fragile and nonrenewable remains of human activity, occupation, or endeavor, reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture, and natural features, which were of importance in human events. These resources consist of (1) physical remains, (2) areas where significant human events occurred—even though evidence of the event no longer remains, and (3) the environment immediately surrounding the actual resource.
- CULTURAL RESOURCE SITE.** A physical location of past human activities or events. Sites vary in size, ranging from the location of a single cultural resource object to a cluster of cultural resource structures with associated objects and features.
- CUSTODIAL GRAZING MANAGEMENT.** A limited form of rangeland management employed when the percentage of public land is small, when public land is scheduled to be transferred from public ownership, or when other conditions are not conducive to intensive management. Under custodial management, an allottee is not required to follow a specified grazing system. BLM licenses custodial allotments only for the capacity of the public land but does not control overall livestock numbers.
- ECOLOGICAL INTEGRITY.** The extent to which an area represents an ecosystem or habitat in its entirety.
- ECONOMIC MINERAL DEPOSIT.** Any mineral deposit of sufficient quality and quantity to produce a profit when mined. (See Subeconomic Resource.)
- ECONOMIC STUDY AREA (ESA).** In this EIS, the one-county area (Mohave County, Arizona) and the four-county area (Maricopa, Pima, Pinal, and Yavapai Counties, Arizona) in which the EISs are located and whose economy would be affected by wilderness designation.
- ECOTONE.** A transition line or strip of vegetation between two communities, having characteristics of both kinds of neighboring vegetation as well as characteristics of its own (Soil Conservation Society of America, 1970).
- ENDANGERED ANIMAL SPECIES.** Any animal species in danger of extinction throughout all or a significant portion of its range. This definition excludes species of insects that the Secretary of the Interior determines to be pests and whose protection under the Endangered Species Act of 1973 would present an overwhelming and overriding risk to man.
- ENDANGERED PLANT SPECIES.** Species of plants in danger of extinction throughout all or a significant portion of their ranges. Existence may be endangered because of the destruction, drastic change, or severe curtailment of habitat, or because of overexploitation, disease, predation, or unknown reasons. Plant taxa from very limited areas, e.g., the type localities only, or from restricted fragile habitats are usually considered endangered. See Threatened and Sensitive Plant Species.
- ENVIRONMENT.** The surrounding conditions, influences, or forces that affect or modify an organism or an ecological community and ultimately determine its form and survival.
- ENVIRONMENTAL ASSESSMENT (EA).** The procedure for analyzing the impacts of some proposed action on a given environment and the documentation of that

- analysis. An EA is similar to an environmental impact statement (EIS) but is generally smaller in scope. An EA may be preliminary to an EIS.
- ENVIRONMENTAL IMPACT STATEMENT (EIS).** An analytical document developed for use by decisionmakers to weigh the environmental consequences of a potential decision. An EIS should accurately portray potential impacts on the human environment of a particular course of action and its possible alternatives.
- EPHEMERAL ALLOTMENT.** An allotment on which livestock grazing is permitted when sufficient precipitation and temperatures provide the potential for the growth of abundant annual (ephemeral) vegetation. See Perennial-Ephemeral Allotment.
- EPHEMERAL RANGELAND.** Rangeland that does not consistently produce forage but periodically provides annual vegetation suitable for livestock grazing.
- EPHEMERAL VEGETATION.** (See Annual Plant.)
- FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976 (FLPMA).** Public law 94-579, which gives BLM the 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 lands.
- FORAGE.** All browse and herbaceous foods available to grazing animals, which may be grazed or harvested for feeding (Range Term Glossary Committee, 1974).
- GRANDFATHERED USES.** A mineral, grazing, or right-of-way use that occurred on the land on the date of approval of the Federal Land Policy and Management Act (FLPMA) (October 21, 1976). Under BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review (Appendix 2), grandfathered uses may continue on lands under wilderness review in the same manner and degree as on the date of FLPMA's approval, even if such uses impair wilderness suitability. These uses, however, must be regulated to ensure that they do not unnecessarily degrade these lands.
- HABITAT.** A specific set of physical conditions that surround the single species, a group of species, or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover, and living space.
- HABITAT MANAGEMENT PLAN (HMP).** A written and officially approved plan (for a specific geographical area of public land) that identifies wildlife habitat and related objectives, establishes the sequence of actions for achieving objectives, and outlines procedures for evaluating accomplishments.
- HARDROCK MINING.** The extraction of locatable minerals except for placer deposits.
- HERD MANAGEMENT AREA PLAN (HMAP).** Plan for the management of a geographic area used by wild horses or burros. A HMAP outlines details of a burro or horse capture plan, adoption program, and long-term management of populations.
- HOHOKAM.** A desert farming culture centered in the middle Gila and Salt River drainage basins of Arizona. The Hohokam produced a characteristic type of red-on-buff pottery. The culture flourished from about 300 B.C. to 1450 A.D.
- INHOLDING.** A parcel of state or private land surrounded by a wilderness study area.
- INSTREAM FLOW.** The amount of waterflow a stream needs to support in a natural state the aquatic and adjacent riparian habitats.
- INTRUSION (VISUAL RESOURCES).** A feature (land, vegetation, or structure) that is generally considered out of context with the characteristic landscape.
- LITHIC SITE.** A site containing debris left from the manufacture, use, or maintenance of flaked stone tools.
- LOCATABLE MINERAL.** Any mineral that can have a mining claim filed on it under the Mining Law of 1872 as amended.
- LOCATION.** The act of fixing the boundaries of a mining claim according to law or the claim itself.
- MANAGEMENT FRAMEWORK PLAN (MFP).** A land use plan for public lands that provides a set of goals, objectives, and constraints for a specific planning area to guide the development of detailed plans for the management of each resource.
- MINERALIZED AREA.** An area that has exposures of near-surface deposits of potentially valuable minerals.
- MANAGEMENT SITUATION ANALYSIS (MSA).** A Management Situation Analysis is a BLM reference document describing the affected environment of the planning area, including current management practices and programs. The MSA is a basic descriptive and analytic reference on resource condition, trend, demands, and capabilities in the planning area, providing the basis for formulating and analyzing plan alternatives.
- MULTIPLE USE MANAGEMENT (PRINCIPLES).** "... the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people, making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions, the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will

- give the greatest economic return or the greatest unit output." (Section 103, Federal Land Policy Management Act of 1976.)
- NATURAL AREA.** Lands managed for retention of their typical or unusual plant or animal types, associations, or other biotic phenomena; or their outstanding scenic, geologic, pedologic (pertaining to soils), or aquatic features or processes.
- OFF-ROAD VEHICLE (ORV).** Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain, excluding (a) any registered motorboat, (b) any fire, military, emergency, or law enforcement vehicle when used for emergencies and any combat or combat support vehicle when used for national defense, and (c) any vehicle whose use is expressly authorized by the respective agency head under a permit, lease, license, or contract.
- OFF-ROAD VEHICLE (ORV) DESIGNATION.** This option designates public lands open, closed, or limited to ORV use. In recognizing ORV use of the public lands, it establishes controls on the use and operation of ORVs. The objective is to provide for ORV use, protect the public lands, promote user safety, and reduce user group conflicts.
- ORE.** A mineral deposit of sufficient quality and quantity to be mined at a profit.
- OVERTHRUST BELT (ZONE).** An extensive zone in western North America (believed to extend from Canada to Mexico) where an overthrust fault has forced older rocks on top of younger rocks. The discovery of oil and gas in the younger rock layers has aroused much interest in exploration throughout the belt, including Arizona.
- PERENNIAL-EPHEMERAL ALLOTMENT.** An allotment on which livestock are permitted to graze perennial vegetation but on which additional livestock grazing may be authorized should sufficient annual (ephemeral) forage be present. See Ephemeral Allotment.
- PERENNIAL PLANT.** A plant that has a life cycle of three or more years (Range Term Glossary Committee, 1974).
- PERENNIAL STREAM.** A stream that flows throughout the year.
- PETROGLYPH.** An art figure or symbol cut, carved, or pecked into a stone surface.
- PHYSIOGRAPHIC INTEGRITY.** Extent to which an area represents a landform in its entirety.
- PICTOGRAPH.** An art figure or symbol drawn or painted on a stone surface.
- PLACER DEPOSIT.** An alluvial or glacial deposit, as of sand or gravel, containing particles of gold or other valuable minerals.
- PLACER MINING.** The extraction of heavy minerals from a placer deposit by concentration in running water. Placer mining includes ground sluicing, panning, shoveling gravel into a sluice, scraping by power scraper, and excavation by drag line.
- PLUTON.** A body of igneous rock that solidified below the surface.
- PRIMITIVE AND UNCONFINED RECREATION.** Non-motorized and undeveloped types of outdoor recreation (hiking, backpacking, camping, and hunting).
- PRIMITIVE AREAS.** Areas established to preserve, protect, and enhance lands of scenic splendor, natural wonder, scientific interest, primitive environment, and other natural values for the enjoyment and use of present and future generations. BLM primitive areas are managed to maintain the same quality.
- PROSPECT.** An attempt to determine mineral values or the site of this attempt.
- PRUDENT MAN RULE.** The Prudent Man Rule is the test of discovery used by the Department of the Interior. The test determines  
 "... where minerals have been found and the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable prospect of success, in developing a valuable mine, the requirements of the statutes have been met."  
 This test has been approved by the Supreme Court of the United States in many cases (e.g., *Chrisman v. Miller*, 197 US 313 (1905); *Best v. Humboldt Placer Mining Company*, 371 US 334 (1963); *U.S. v. Coleman*, 390 US 599 (1968)).
- PUBLIC LAND.** Federal lands administered by the Bureau of Land Management.
- RANGELAND (RANGE).** Land dominated by vegetation that can be grazed or browsed and whose husbandry is provided routinely through grazing management instead of renovation or cultural treatment.
- RANGELAND DEVELOPMENT.** A structure, development, or action used together with good management practices and land use planning recommendations (1) to rehabilitate, protect, and improve public land and its resources; (2) to arrest rangeland deterioration; and (3) to improve forage condition, fish and wildlife habitat, watershed protection, and livestock production.
- RAPTOR.** A bird of prey with sharp talons and strongly curved beak.
- RESOURCE MANAGEMENT PLAN (RMP).** A BLM planning document that presents systematic guidelines for making resource management decisions for a resource area. An RMP is based on an analysis of an area's resources, their existing management, and their capability for alternative uses. RMPs are issue-oriented and developed by an interdisciplinary team with public participation.
- RHYOLITE.** A silica-rich fine-grained rock of volcanic origin.

- RIPARIAN.** Situated on or pertaining to the bank of a river, stream, or other body of water. Riparian is normally used to refer to the plants of all types that grow near bodies of water.
- ROADLESS.** The absence of roads that have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.
- SCHIST.** Any of various medium- to coarse-grained metamorphic rocks composed of laminated, often flaky, parallel layers of chiefly micaceous minerals.
- SCOPING.** An early and open process for determining the scope of issues to be addressed in an EIS and for identifying the significant issues related to a proposed action. Scoping may involve public meetings, field interviews with representatives of agencies and interest groups, discussions with resource specialists and managers, and written comments in response to news releases, direct mailings, and articles about the proposed action and scoping meetings.
- SEGREGATION.** Any action such as a withdrawal or allowed application (exchange) that suspends the operation of the general public land laws. To separate or set apart, to remove lands from the operation of part or all the public land mineral laws.
- SENSITIVE PLANT SPECIES.** Plants whose populations are consistently small and widely dispersed, or whose ranges are restricted to a few localities, such that any appreciable reduction in numbers, habitat availability, or habitat condition might lead toward extinction. Sensitive plants also include species rare in one locality (such as in Arizona) but abundant elsewhere. See Endangered and Threatened Plant Species.
- SITE (ARCHAEOLOGICAL).** A physical location where human activities or events occurred.
- SOCIOCULTURAL RESOURCES.** Places, objects, structures, and things of importance to a subgroup or population at large. Included are values that reflect the concepts, religion, social heritage, habits, skills, arts, and lifestyles of a given people.
- SPECIAL-STATUS SPECIES.** Those wildlife species either federally listed as endangered or threatened, state-listed, or listed by BLM as sensitive.
- STANDARD METROPOLITAN STATISTICAL AREA (SMSA).** A county that contains at least one city of 50,000 residents or more and as many adjacent counties as are metropolitan in character and are socially integrated with that central city or cities.
- STATE HISTORIC PRESERVATION OFFICER (SHPO).** The official within each state, authorized by the state at the request of the Secretary of the Interior, to act as a liaison for implementing the National Historic Preservation Act of 1966.
- STRATEGIC MINERALS.** Minerals essential to the national defense, for the supply of which the United States is wholly or in part dependent upon sources outside its continental limits and for which strict measures are needed to control conservation and distribution.
- SUBECONOMIC MINERAL DEPOSIT.** Known mineral deposits of sufficient quantity but insufficient quality to be mined at a profit under present conditions. See Economic Mineral Deposit.
- SUPPLEMENTAL WILDERNESS VALUES.** Resources not required for an area to be designated a wilderness but that are considered in assessing the wilderness potential of an area. Such values include ecological, geologic, and other features of scientific, educational, scenic, or historical value.
- THREATENED ANIMAL SPECIES.** Any animal species likely to become endangered within the foreseeable future throughout all or a significant part of its range. See Endangered Animal Species.
- THREATENED PLANT SPECIES.** Species of plants that are likely to become endangered within the foreseeable future throughout all or a significant portion of their ranges, including species categorized as rare, very rare, or depleted. See Endangered Plant Species and Sensitive Plant Species.
- TUFF.** A rock formed of compacted volcanic fragments that are generally smaller than four millimeters in diameter.
- UTILIZATION (FORAGE).** The proportion of the current year's forage consumed or destroyed by grazing animals. Utilization is usually expressed as a percentage.
- VEGETATION TYPE.** A plant community with distinguishable characteristics, described by the dominant vegetation present.
- VEHICLE WAY.** A vehicle route established and maintained solely by the passage of motor vehicles.
- VISITOR DAY.** 12 visitor hours, which may be aggregated continuously, intermittently, or simultaneously by one or more people.
- VISUAL RESOURCE MANAGEMENT (VRM) CLASSES.** Classification containing specific objectives for maintaining or enhancing visual resources, including the kinds of structures and modifications acceptable to meet established visual goals.
- WILDERNESS.** An uncultivated, uninhabited, and usually roadless area set aside for preservation of natural conditions. According to section 2(c) of the Wilderness Act of 1964.
- A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1)

generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

**WILDERNESS STUDY AREA (WSA).** A roadless area or island that has been inventoried and found to have wilderness characteristics as described in section 603 of the Federal Land Policy and Management Act and section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

**WITHDRAWAL.** An action that restricts the disposal of public lands and holds them for specific public purposes; also, public lands that have been dedicated to public purposes.



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