



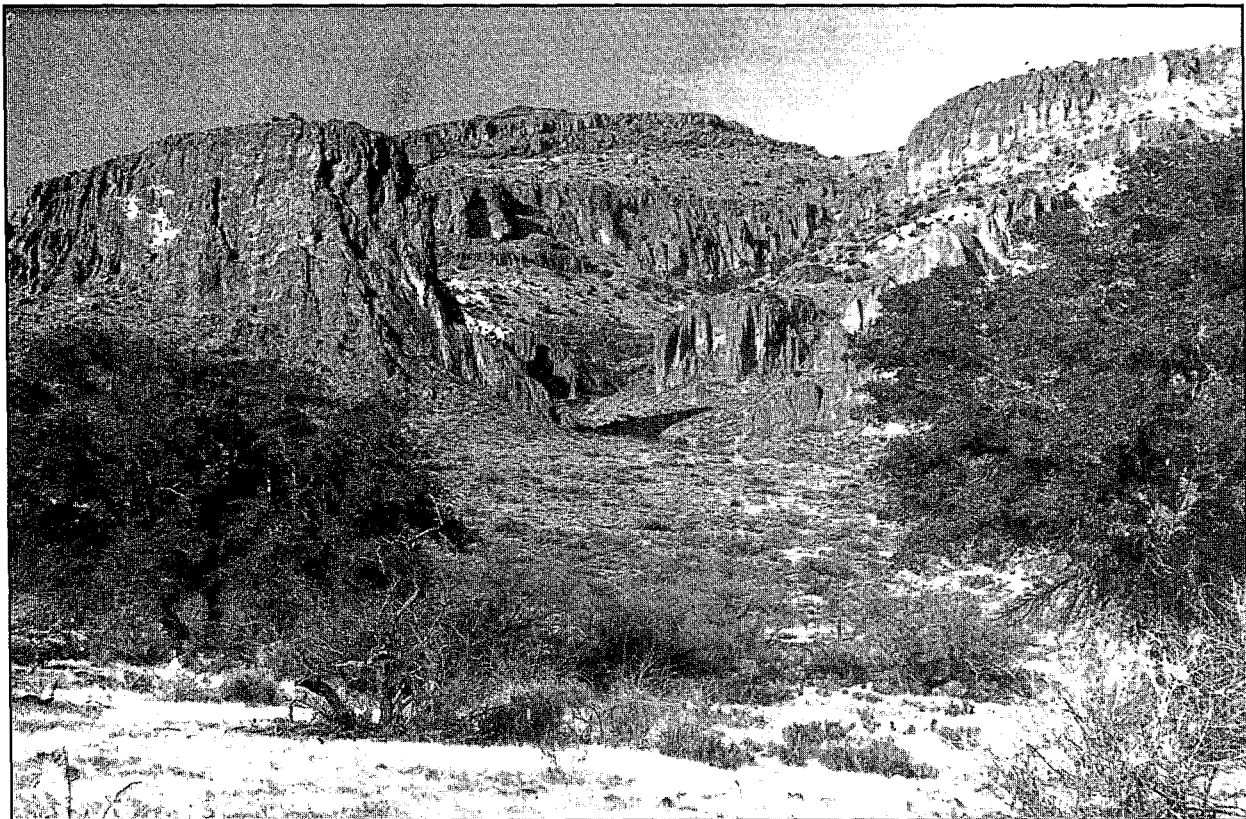
**U.S. Department of the Interior**  
Bureau of Land Management  
Arizona State Office

Safford District Office

June 1995



# **Peloncillo Mountains Wilderness Management Plan, Environmental Assessment, and Decision Record**



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

**BLM/AZ/PL-95/016**



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Safford District Office

711 14th Avenue

Safford, AZ 85546

(520) 428-4040



In reply refer to:  
8560 (045)

**JUL 15 1995**

Dear Reader:

The document accompanying this letter contains the Final Peloncillo Mountains Wilderness Management Plan, Environmental Assessment, and Finding of No Significant Impact/Decision Record. The plan will enable the Bureau of Land Management (BLM) to improve its management of the Peloncillo Mountains Wilderness. The Environmental Assessment analyzes the impacts expected from implementing the Plan. Based on this analysis, the Finding of No Significant Impact determines that impacts are not expected to be significant. The Decision Record documents the Bureau of Land Management's final decision.

The Draft Peloncillo Mountains Wilderness Management Plan was released for public review and comment in August 1994. Comments on the draft plan were analyzed and included into the writing of the final plan document. Public comments and responses can be found in Part VIII - Public Involvement.

The Environmental Assessment and Decision Record are subject to appeal in accordance with procedures contained in 43 Code of Federal Regulations, Part 4. Implementation of this plan will not begin until 30 days after the date of this letter.

A special thanks is due to all who participated in this planning process and contributed to the development of the final document.

Sincerely,

Vernon L. Saline  
San Simon Area Manager

Enclosure (1)

# Peloncillo Mountains Wilderness Management Plan, Environmental Assessment, and Decision Record

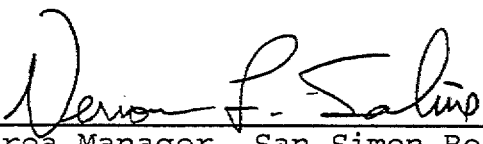
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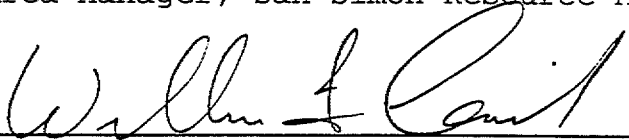
Safford District

San Simon Resource Area

EA Number: AZ-040-04-18

Recommended by:   
Area Manager, San Simon Resource Area

5/18/95  
Date

Recommended by:   
District Manager, Safford District

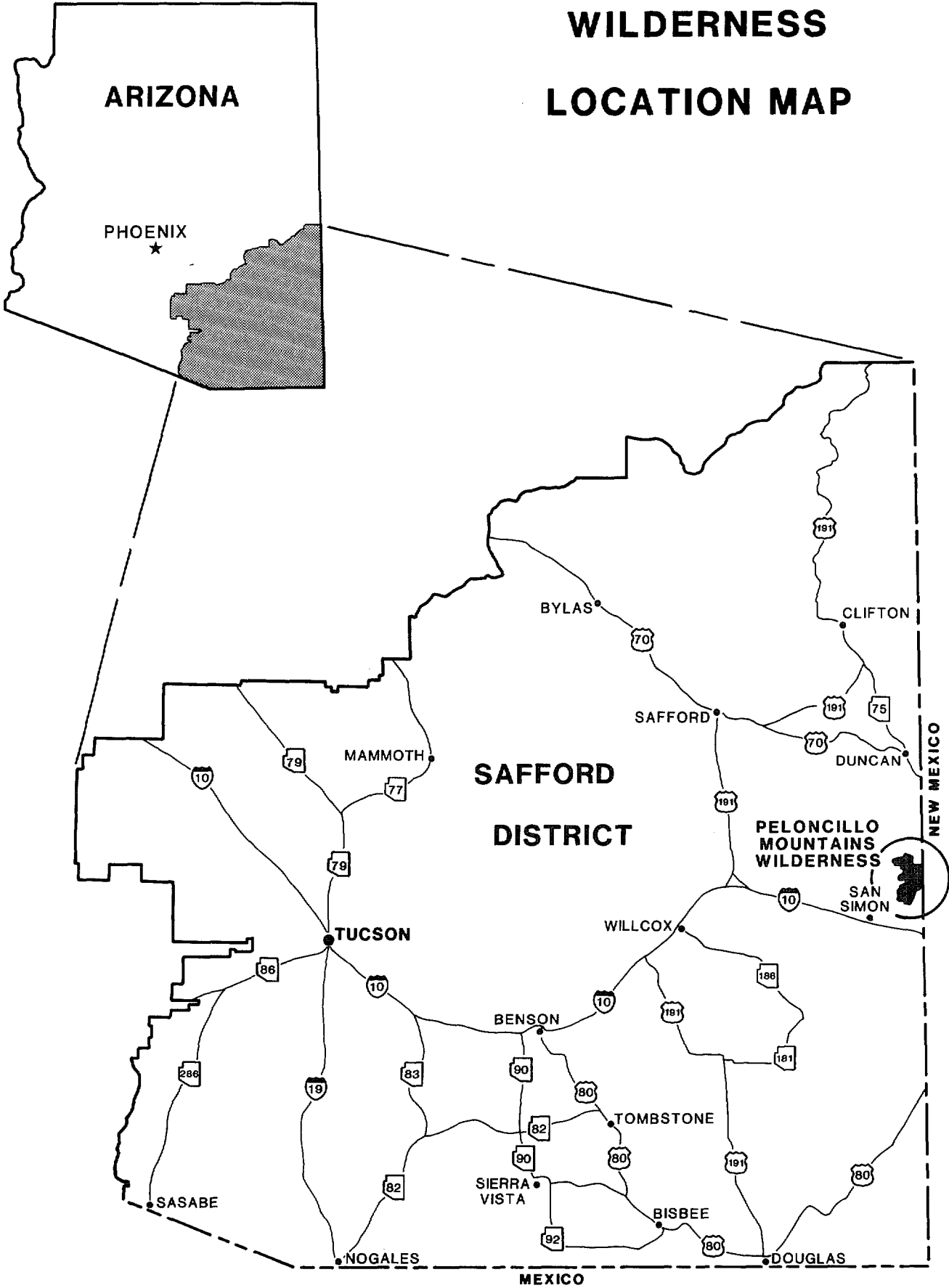
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Date

Approved by:   
State Director, Arizona

5-30-95  
Date

# PELONCILLO MOUNTAINS WILDERNESS

## LOCATION MAP



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# Part I — Introduction

## Purpose of Management Plan

This wilderness management plan establishes the objectives, policies and actions by which the Peloncillo Mountains Wilderness will be managed for the 10-year period 1995-2005. The plan then sets forth a sequence for implementing these actions. This plan also fulfills the Bureau of Land Management Manual 8560 requirement that management plans be prepared for all BLM administered wilderness.

This is an interdisciplinary plan that amends all previous planning direction for this planning area. Specifically, this plan amends all allotment management plans written for this area and the portions of the Gila-Peloncillo Habitat Management Plan applying to this area. This plan also supersedes the Safford District Interim Guidance for Fire Suppression in Wilderness Areas (1994) and the Interim Wilderness Operation and Maintenance Plan for the Peloncillo Mountains (1994).

Periodic evaluations of the plan and its implementation will be conducted as ongoing process in managing the planning area (see Part VI-Plan Evaluation). These evaluations will determine what progress is being made toward meeting the plan's objectives. Information gathered from monitoring actions identified in the plan will be used to make those determinations. In the event that objectives are not being met, adjustments will be made to planned actions through modifying actions identified in the plan or adding new actions that will lead to accomplishing the plan's objectives. New issues, pro-

posals or information that may have developed since the plan's approval will be considered in the evaluation. The specific and cumulative impacts of any new proposals will be analyzed according to guidelines in laws, manuals and other policy through the environmental assessment process, as necessary.

## Wilderness Area Overview

### Location

The Peloncillo Mountains Wilderness is located just west of the Arizona-New Mexico state line, 9 miles northeast of the small community of San Simon, Arizona. The wilderness lies 210 miles southeast of Phoenix and 130 miles east of Tucson (the two largest metropolitan areas in Arizona) and 50 miles southeast of Safford, Arizona (see location map on inside cover). The designated area is within Townships 11, 12 and 13 South, Ranges 31 and 32 East, Gila and Salt River Meridian.

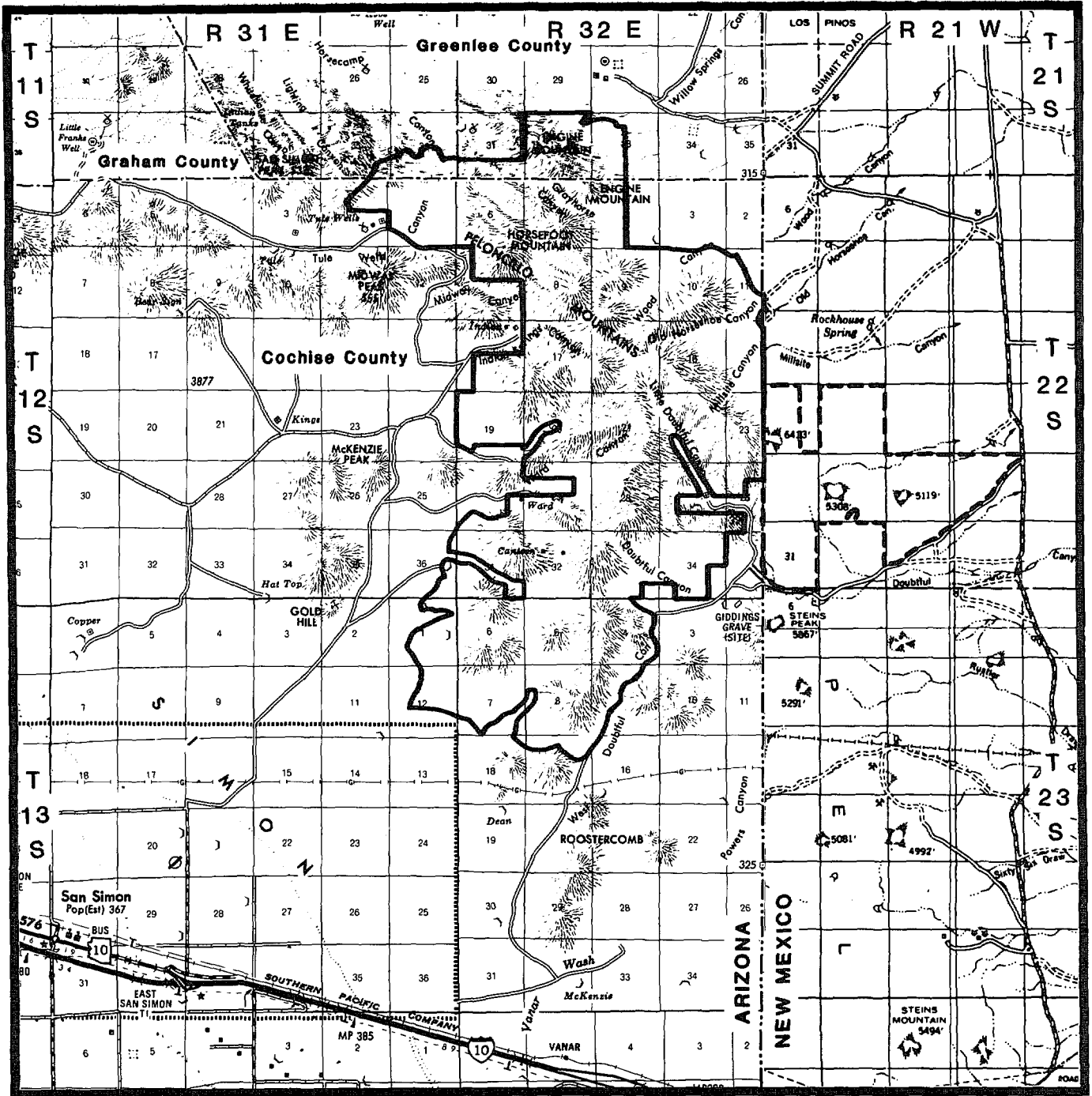
### Access

Access to the northern boundary of the wilderness can be gained by traveling 17 miles east of Duncan, Arizona, on Highway 70 then south on the Summit Road. The southern portion can be accessed by traveling north of San Simon, Arizona on the road leading to McKenzie Peak or east of San Simon staying on the frontage road north of Interstate 10 to the West Doubtful Road (Map 1).

Legal access is available from San Simon along the road to McKenzie Peak and the West Peloncillo Roads and from



Map 1



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

**PELONCILLO MOUNTAINS  
WILDERNESS AND  
WILDERNESS STUDY AREA**

- WILDERNESS AREA BOUNDARY**
- - - WILDERNESS STUDY AREA BOUNDARY**



LOCATION MAP

Basemap © ADOT



1993

San Simon to the southern portion of the wilderness along the West Doubtful Canyon Road. Legal access is available to the northeast portion of the wilderness at Old Horseshoe Canyon from the Summit Road. Physical access is currently restricted by landowners at the southeastern boundary near Little Doubtful Canyon and at the western boundary near Indian Springs Canyon. While the main access roads are graded dirt near the major highways, a four wheel drive vehicle is necessary to access the wilderness.

### **Ownership and Land Uses**

BLM administers all land immediately adjacent to the wilderness except for private land near and around Doubtful Canyon, Canteen Springs, Ward Canyon, and Indian Springs Canyon. There are no State or private surface or subsurface inholdings or utility rights-of-way within the wilderness.

### **Wilderness Values**

The 19,440 acre Peloncillo Mountains Wilderness contains a variety of scenic, geological, cultural, biological, and recreational values.

The area lies in the rugged part of the Peloncillo Mountains, a north-south trending mountain range that roughly parallels the Arizona and New Mexico state line from Mexico to the Gila River east of Safford. The main features of the area are steep mountains, cliffs and numerous oak-lined canyons. Elevations range from 4,100 feet in the southern part of the wilderness to 6,400 feet in the center of the area.

Climatic conditions in the Peloncillo Mountains Wilderness are similar to those found throughout the region. In southeast

Arizona, lowlands alternate with mountains to create abrupt changes in climatic conditions over short distances. Higher elevations produce cooler temperatures and more precipitation than valley locations. Summer days are hot, with temperatures reaching 100 degrees Fahrenheit. Winter mean minimum temperatures are below freezing with snow common in the higher elevations. Annual rainfall averages 7 to 16 inches in the valleys and 15 to 30 inches in the higher elevations, with most of it coming in the late summer months. Drought conditions are most common from April to June. Long, severe droughts occur irregularly and are usually two to five years long.

The wilderness is natural in appearance. There are however developments associated with management of livestock grazing, wildlife and a sensitive cultural site. These include approximately 29 miles of fence, eight dirt tanks, three wildlife water developments, two developed springs, two miles of trail and the Midway Cave enclosure. The visual contrast rating of these developments are classified as weak to none under BLM's visual resource management program with the exception of Horseshoe and Horsefoot wildlife water developments and the developed Canteen spring. These developments are rated moderate. All developments are listed in Appendix A and located on Map 2.

The area provides outstanding opportunities for primitive recreation, including hiking, backpacking, rock scrambling, hunting and sightseeing. The higher country offers long distance views and excellent scenery enhances wilderness values in the rugged mountains and canyons.

# General Management Situation

## Livestock Grazing

The wilderness includes parts of seven grazing allotments (see Table 1).

Associated with these grazing allotments are several range developments including reservoirs, storage tanks, fences, and pipelines (Appendix A and Map 2).

The following are descriptions of livestock grazing management on the allotments that have wilderness within their boundaries.

*Midway Canyon* - An Allotment Management Plan was signed in 1985 and fully implemented in 1993. It uses a three pasture rest rotation grazing system with livestock moves about every 6 months. Prior to implementation of the AMP, cattle were previously moved into pastures with no set schedule or prescribed rest periods. In order for the system to work as intended, some fence maintenance must occur.

*Joy Valley* - An Allotment Management Plan was signed and implemented in 1980. The grazing system is a modified rest-rotation and best-pasture system. There are 9 pastures of varying size and forage quality. Each year, one or two pastures are rested yearlong. Cattle are removed from a pasture when proper utilization (average 40%) on key forage species, which include black grama, side oats grama, tobosa, and fourwing salt-bush, is reached.

*Roostercomb* - An Allotment Management Plan was signed by a previous permittee in 1970. A revision was written in 1976, but never signed or implemented. A new grazing system is in the planning stage for the current permit-

tee and will incorporate some method of rest-rotation.

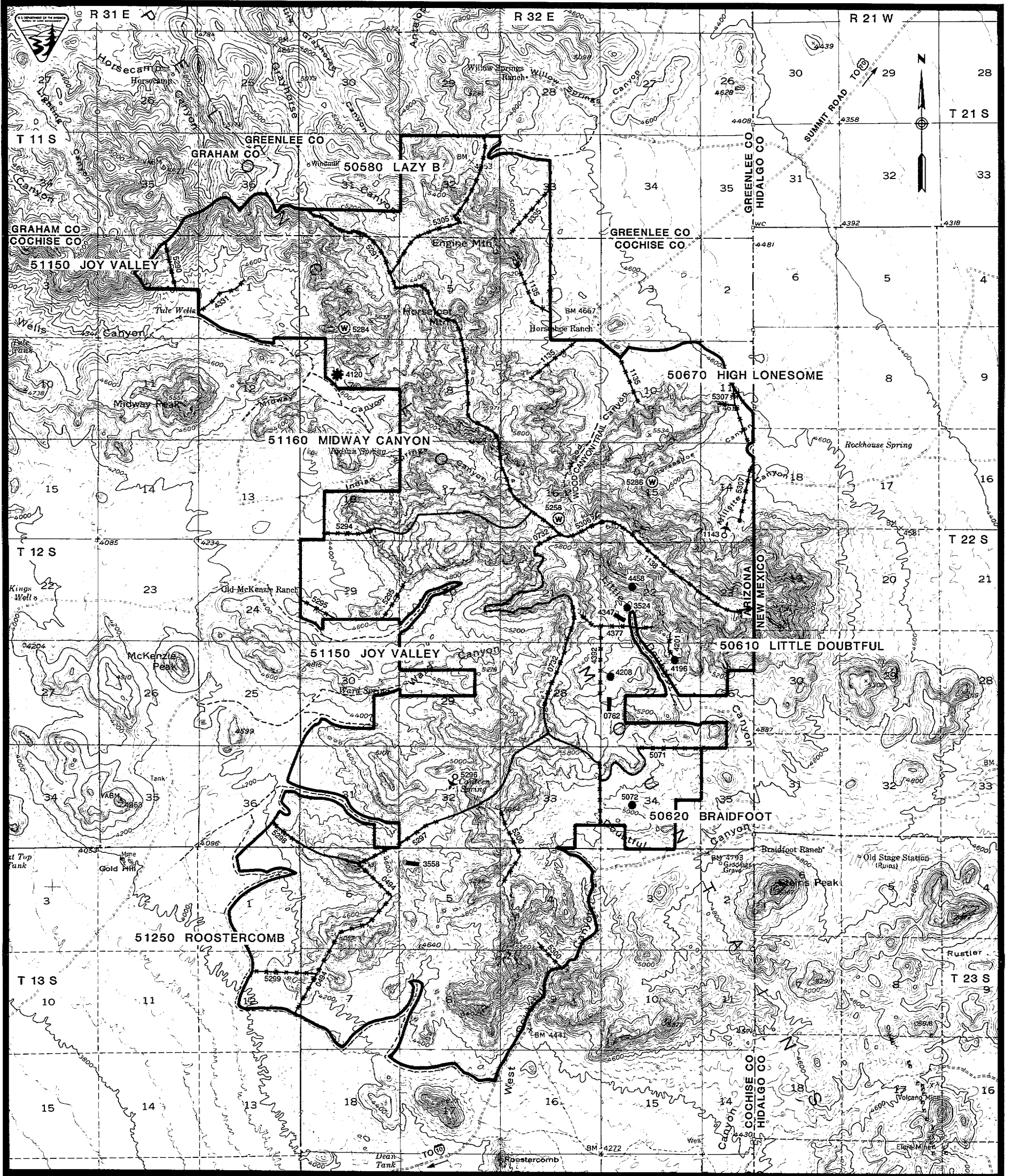
*Lazy B* - The Lazy B allotment recently transferred to a new permittee. The allotment was previously run on a national stewardship plan and so it does not have an allotment management plan. Current management is to assure one pasture is rested during the growing season and utilization will average 40%. An allotment management plan is scheduled for development in 1995.

*Braidfoot* - The Braidfoot Allotment Management Plan was signed in 1987 and implemented in 1988. The cattle are moved on a best pasture system with the permittee deciding when and where cattle are to be moved. Constraints include no more than 40% utilization in wilderness and no pasture may be used during the summer growing season for 2 consecutive years. The allotment has a temporary increase in livestock numbers which may become permanent in the future.

*Little Doubtful* - An Allotment Management Plan was signed and implemented in 1980 by a previous permittee which incorporated a best pasture grazing system. Since that time there have been 2 permittees who did not implement the AMP. The current grazing authorization for the allotment was cancelled in December 1994. A determination on future grazing of the allotment will be made pending a decision from the Federal Court.

*High Lonesome* - A draft Allotment Management Plan has been written and is currently going through the NEPA process and public review. Management in the wilderness consists of seasonal use by a small portion of the herd. This seasonal use occurs mainly during the winter months. Holistic Resource Management is being used on the allotment but the tool

Map 2

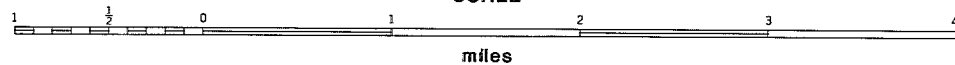


LEGEND

- TRAIL
- FENCE
- DEVELOPED SPRING
- TANK
- DAM
- ⊙ DEVELOPED WILDLIFE WATER
- ✱ CULTURAL FACILITY

PELONCILLO MOUNTAINS WILDERNESS DEVELOPMENTS

SCALE



**Table 1:** Grazing Allotments in the Peloncillo Mountains Wilderness

Allotment	Acres in Wilderness	Acres Out	AUM's In	AUM's Out
Midway Canyon	2,915	2,989	216	408
Joy Valley	3,888	60,586	216	3,384
Roostercomb	4,666	25,270	420	1,080
Lazy B	623	87,821	145	20,459
Braidfoot	583	9,176	48	1,154
Little Doubtful	2,139	1,024	384	100
High Lonesome	4,626	19,045	983	4,045
<b>Totals</b>	<b>19,440</b>	<b>205,911</b>	<b>2,412</b>	<b>30,630</b>

of animal impact achieved by increased livestock numbers will not be used in the wilderness.

### Vegetation

The Peloncillo Mountains Wilderness Area's mountain shrub, grassland, desert shrub and creosotebush vegetation types include mesquite, snakeweed, burroweed, various grasses, turpentine bush, juniper, Emory oak, creosotebush, catclaw, whitethorn, agave and prickly pear cactus.

Vegetative trend data has been collected to determine changes in plant frequency over time. Frequency data shows whether plant species increase or decrease over time. Collected data indicate that trend is static or upward on all allotments in the wilderness with the exception of the Little Doubtful Allotment. Management actions have been initiated to correct problems on this allotment.

The Peloncillo Mountains Wilderness consists of seven ecological sites. Ecological site is a classification of rangeland that identifies a characteristic natural plant community. Ecological sites are defined and described by soil, species

composition, and the potential amount of biomass produced. Each ecological site has an ability to produce certain kinds and amounts of native vegetation.

Each site is evaluated according to the kinds and amounts of vegetation present as compared to the potential natural plant community and is grouped into one of the following four classes: potential natural community, high seral, mid seral and low seral stages. A seral stage refers to a step or phase of vegetative community succession.

A brief description of the composition of the potential plant community of each site is given below as well as the current composition of each site. The current condition and number of acres for each site is also listed in Table 2. The location of each site and transect is indicated on Map 3.

*Volcanic Hills* - The potential plant community on this ecological site is dominated by warm season perennial grasses. Many species of shrubs are well represented on the site. Larger shrubs are concentrated at the edges of rock outcrops and in canyon bottoms. All of the major

grass species are well dispersed throughout the plant community. The aspect, or general landscape appearance, is open grassland.

This community is relatively stable with the exception of snakeweed which increases with adequate winter precipitation and decreases when winter precipitation is lacking. Natural fire is a factor in the development of this site's potential vegetation.

The potential natural vegetation on this site would consist of 65-75% grasses, 10-15% forbs and 15-20% shrubs and trees. There is a total of 17,744 acres of volcanic hills in the wilderness of which 17,282 acres are in high seral condition (55-60% grasses, 15% forbs and 25-30% shrubs and trees) and 462 acres in mid seral condition (40% grasses, 10% forbs and 50% shrubs and trees).

*Limy Upland* - The potential plant community on this ecological site is a diverse mixture of desert shrubs and perennial grasses and forbs. Most of the major perennial grasses on the site are well dispersed throughout the plant community. Black grama occurs in patches which are small in size and these patches appear to be well dispersed over larger areas of the site. The aspect is shrubland.

The potential natural community for this site would contain 25-40% grasses, 5-10% forbs and 50-70% shrubs and trees. There is a total of 1,015 acres of limy upland in the wilderness, all currently in high seral condition (15-30% grasses, 10% forbs and 60-75% shrubs and trees).

*Loamy Upland* - The potential plant community on this ecological site is dominated by warm season perennial grass. Occasional trees and shrubs occur in the plant community.

The potential natural community for this site would consist of 70-80% grasses, 0-10% forbs and 5-15% shrubs and trees.

There are 90 acres of loamy upland in the wilderness, all currently in mid seral condition (20% grasses, 10% forbs and 70% shrubs and trees).

*Clay Upland* - The potential plant community on the ecological site is dominated by warm season perennial grasses. The major perennial grasses on this site occur in patches, both large and small and not evenly dispersed over areas of the site.

Soil churning and cracking may limit invading species on this site. Natural fires may have been important in the development of the potential plant community.

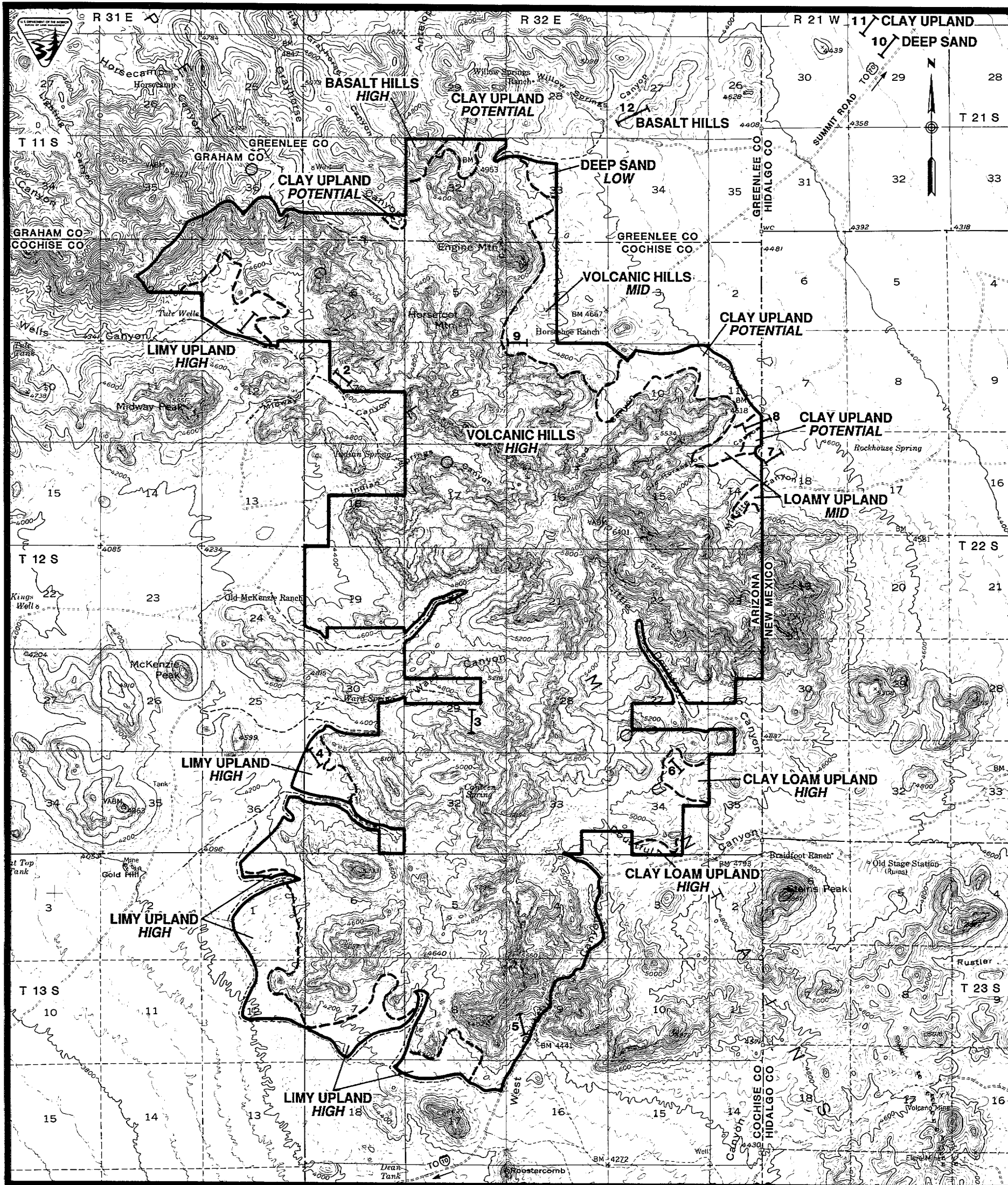
The potential natural community for this site is 80-90% grasses, 5-15% forbs and 1-5% shrubs and trees. There are 359 acres of clay upland in the wilderness, all currently in potential natural condition (85% grasses, 10% forbs and 5% shrubs and trees).

*Deep Sand* - This ecological site is grassland ecosystem dominated by short and mid-height grasses mixed with shrubs and half-shrubs, such as snakeweed or burroweed. It is characterized by short-lived perennials such as the dropseeds, which fluctuate greatly with precipitation.

The potential natural community for this site would consist of 65-75% grasses, 10-15% forbs and 15-20% shrubs and trees. There are 44 acres of deep sand in the wilderness, all currently in low seral condition (0% grasses, 10% forbs and 90% shrubs and trees).

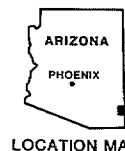
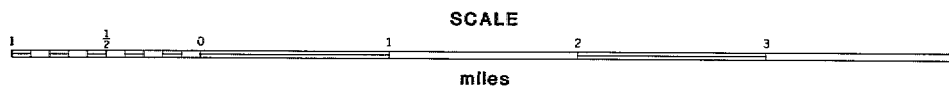
*Basalt Hills* - The potential plant community on this ecological site is dominated by warm season perennial grasses. Shrubs are well represented on the site as well as perennial and annual forbs. The major grass species tend to be well dispersed throughout the plant community. Shrubs are concentrated at the edge of outcrops and along talus slides. The aspect is shrub dotted grassland.

Map 3



**PELONCILLO MOUNTAINS WILDERNESS  
ECOLOGICAL SITES AND CONDITION**

—|— TRANSECT LOCATIONS



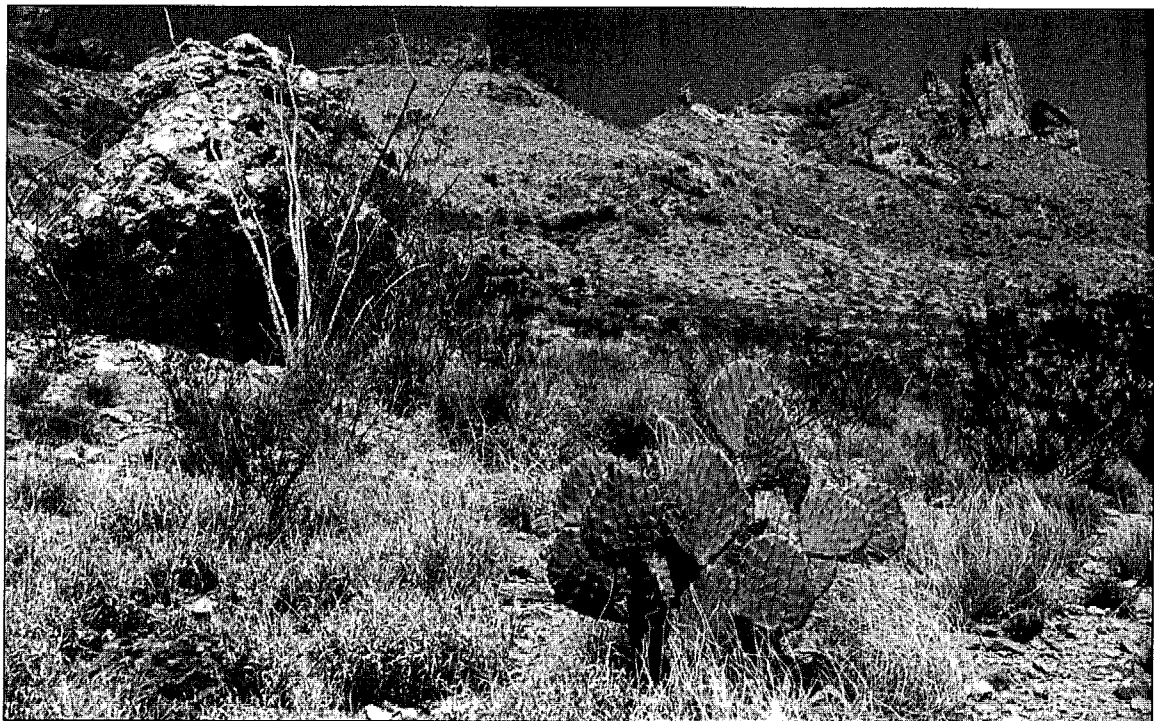
Well developed cobble and stone cover protects the soil from erosion. The dark color of the cobbles on the surface warm the soil in the cool season allowing plants to grow later into the fall and earlier in spring than on other sites. Natural fire is a factor in the development of the potential plant community of this site.

The potential natural community for this site is 60-70% grasses, 10-15% forbs and 20-30% shrubs and trees. There are 46 acres of basalt hills in the wilderness, all currently in high seral condition (65% grasses, 10% forbs and 25% shrubs and trees). Although there are 65% grasses on this site, not all of those count toward the potential natural community. Therefore the site is in high seral instead of potential natural condition.

*Clay Loam Upland* - The potential plant community on this ecological site is

dominated by warm season perennial grasses. Most of the major perennial grass species on the site are well dispersed throughout the plant community. However, tobosa, vine mesquite and curly mesquite tend to occur in patches on this site. These patches appear to be well dispersed and are small in size. Perennial forbs are well represented on the site as well as a few species of low shrubs. The aspect is open grassland. Natural fire may have been important in the development of the potential plant community.

The potential natural community for this site is 75-85% grasses, 5-15% forbs and 5-10% shrubs and trees. There are 142 acres of clay loam upland in the wilderness, all currently in high seral condition (35% grasses, 15% forbs and 50% shrubs and trees).



Prickly pear, ocotillo, and creosote bush are found in the wilderness.



**Table 2:** Ecological Site Inventory, Peloncillo Mountains Wilderness 1993

<b>Ecological Site</b>	<b>Condition</b>	<b>Acres</b>
Volcanic Hills	High seral Mid seral	17,282 462
Limy Upland	High seral	1,015
Loamy Upland	Mid seral	90
Clay Upland	Potential Natural Community	359
Deep Sand	Low seral	44
Basalt Hills	High seral	46
Clay Loam Upland	High seral	142
<b>Total</b>		<b>19,440</b>

## **Wildlife**

The Peloncillo Mountains Wilderness is inhabited by diverse wildlife including mammals, birds, amphibians, and reptiles. Species are typical of those associated with the desert shrub, mountain shrub, grassland and creosote habitat of south-eastern Arizona. Some of the more common species are mule deer, mountain lion, javelina, cottontail rabbit, blacktailed jackrabbit, bobcat, coyote, quail and dove. Desert bighorn sheep, extirpated in the early 1900's and reintroduced in 1986 and 1990, have increased steadily and are expanding their range. The current population of bighorn sheep in the Peloncillo Mountains Wilderness is estimated to be 60-75. The peregrine falcon, an endangered species, is the only special status species known to be found in the wilderness. However, the planning area contains suitable habitat for several other special

status species which include the lesser long-nosed bat; California leaf-nosed bat; Mexican long-tongued bat; ferruginous hawk; Loggerhead shrike; and Texas horned lizard.

Wildlife habitat management in the Peloncillo Mountains Wilderness is guided by the Gila-Peloncillo Habitat Management Plan (HMP). In general, this plan seeks to enhance the quality of habitat for all wildlife species, with special emphasis on threatened, endangered, and sensitive species. Other habitat management emphasis is on the recent transplants of desert bighorn sheep in the area to reestablish them in this portion of their historic range.

Arizona Game and Fish Department monitors the herd population with annual aerial and ground surveys. Aerial monitoring of radio collared sheep to determine herd distribution and health is also

conducted monthly, provided aircraft and personnel are available. Aerial population surveys and monitoring are low level flights conducted below 2000 feet above ground level.

Currently three wildlife water developments are located within the wilderness. Horseshoe Canyon and Horsefoot Mountains bighorn sheep waters consist of a small masonry dam, pipeline, and 2,000 gallon fiberglass storage. Horseshoe Canyon water development is functioning at full capacity while Horsefoot water development is functioning in a limited capacity. The third wildlife water development, Goat Dam, is not functional at this time. These facilities are listed in Appendix A and located on Map 2.

## **Recreation**

Because of the remoteness and lack of easy access the Peloncillo Mountains Wilderness has received very light recreation use. No visitor use data have been collected for this area, however it is estimated to be around 200 visitor days a year with no significant change expected during the life of this plan. The majority of this use occurs during the autumn deer, javelina and quail hunting seasons. Camping associated with hunting is concentrated in Horseshoe, Millsite, Little Doubtful, and Ward Canyons and the unnamed canyon in T.11 S., R.32 E. Occasional visits are made to the area for hiking, backpacking, camping and sight-seeing.

No developed recreational trailheads, parking areas, or hiking trails exist in the wilderness area. Several abandoned access routes developed prior to wilderness designation, are utilized to a limited extent for hiking and horseback riding.

Permits for non-commercial visitor use are not required at this time and no special limits are imposed on party size or on the length of stay, other than the District policy of no more than 14 days at one site. No special recreation permits for commercial use have been issued.

Currently visitors requesting information on the wilderness area are given a two page handout containing a map (approximately 1:125,000 scale) and other pertinent information about the wilderness.

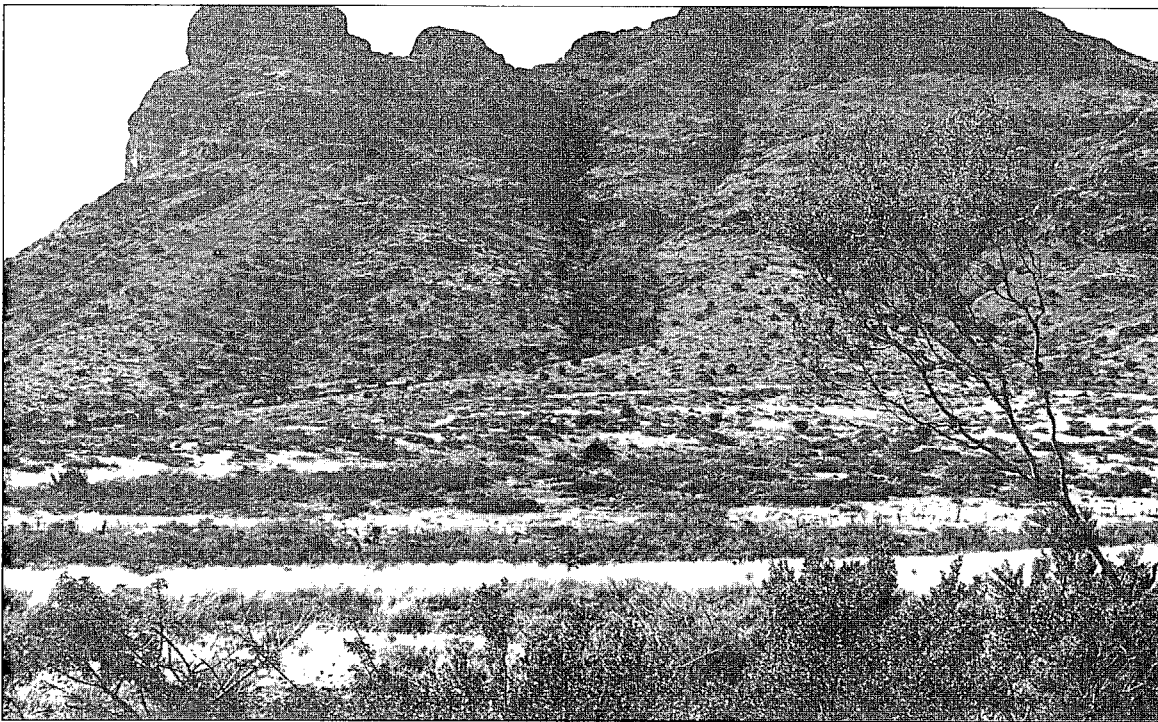
## **Administration**

The Peloncillo Mountains Wilderness is administered under the authority and provision of the Wilderness Act of 1964, the Federal Land Policy and Management Act of 1976, and the Arizona Desert Wilderness Act of 1990. Procedures for the management of the public lands designated as the Peloncillo Mountains Wilderness are found in Management of Designated Wilderness Areas (43 CFR Part 8560). Guidance for management of wilderness is found in the BLM Manual Section 8560.

The Safford District Law Enforcement Ranger has authority to enforce 43 CFR Part 8560.1-2, Prohibited Acts, or any other laws or regulations pertinent to public lands. Law enforcement may also be handled by any appropriate state, county, or federal agency possessing federal law enforcement authority.

Signs are limited to boundary areas of the wilderness and along access routes. Signs have been posted at previously used vehicular access points along the boundaries.

The adjacent Peloncillo Mountains Wilderness Study Area in New Mexico contains 4,061 acres of public land. This



A view of Engine Mountain in the northern portion of the wilderness.

portion will be addressed in future New Mexico wilderness legislation. BLM has recommended 582 acres of the 4,061 acres be designated as wilderness. The Peloncillo Mountains Wilderness Management Plan will be updated to include any designated portions of the Wilderness Study Area.

## **Fire**

No long term data has been kept on fires occurring specifically within the Peloncillo Mountains Wilderness. It is known that there has been a low incidence of fires in the past twenty years, with a small amount of acres burned in each incident. However, fire has been a natural component in developing the vegetation in this area.

Peloncillo Mountains Wilderness is designated Class II under the Clean Air Act. The nearest Class I area is the Gila Wilderness approximately 40 miles to the northeast.

Prior to development of this plan, the policy has been to suppress all wildfires in the wilderness.

## **Cultural**

The area is rich in archaeological sites with the historic Butterfield Stage Route forming the southern boundary of the wilderness. Prehistoric remains include permanent habitation sites, temporary camps, sherd and lithic scatters, cave sites, cliff dwellings, food storage features, rock art sites, and single isolated artifacts.

An eight foot high chain link fence, 594 feet long has been constructed to protect cultural resources at Midway Cave. Vandalism has not been a problem since construction of this fence.

Potential contemporary use of the wilderness was identified by an elder of the San Carlos Apache Tribe. Activities include the collection of medicinal plants and acorns which are a traditional food item.

## Part II — Wilderness Goals

The following four national policy goals from BLM manual 8561 provide guidance for wilderness management. The management objectives and actions developed in part IV of this plan are designed to help BLM attain the goals that guide the management of BLM-administered wilderness.

1. To provide for the long term protection and preservation of the area's wilderness character under a principle of nondegradation. The area's natural condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historical value present will be managed so that they will remain unimpaired.
2. To manage the wilderness area for the use and enjoyment of visitors in a manner that will leave the area unimpaired for future use and enjoyment as wilderness. The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use.
3. To manage the area using the minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Management will seek to preserve spontaneity of use and as much freedom from regulation as possible.
4. To manage non-conforming but accepted uses permitted by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area's wilderness character. Non-conforming uses are the exception rather than the rule; therefore, emphasis is placed on maintaining wilderness character.

# Part III — Issues

Wilderness management issues were gathered from BLM resource specialists, other agencies, and the public. Following identification, the issues were divided into three categories. Objectives and management actions developed in this plan solve the issues listed in Section A. The second category includes issues that could be resolved through guidance from BLM manual 8560 or that are matters of federal or state law that limit flexibility in management by BLM. These issues are summarized in Section B of this part and will not be addressed further in this plan. The final category are issues beyond the scope of this plan. These issues are identified in section C of this part along with reasons why the plan does not address the issue.

## A. Issues addressed in this plan

1. Preservation of Wilderness Values including naturalness, outstanding opportunities for solitude and primitive recreation, and supplemental features.

All uses of wilderness are managed with the underlying principle that wilderness values will be protected. The following concerns are addressed:

- How will existing range and wildlife developments be maintained?
- What wildlife facilities and operations will be allowed?
- What new range developments will be allowed?
- Will any restrictions be placed on visitor use?
- What actions will be taken to protect the wilderness from unauthorized motor vehicle use?
- To what extent are visitor facilities including trails and parking areas needed?
- What will done to reduce the visual impacts of 3 water developments and campsites?
- How will cultural resources be managed?

## 2. Management of Vegetation

Many land uses affect vegetation. These activities and uses will be managed to attain vegetation objectives. Decisions address the following concerns:

- What is the best use of the vegetation resource?
- How will livestock grazing be managed?
- What plant communities are desired throughout the wilderness to achieve wilderness objectives?
- How will fire be managed in the wilderness?

## B. Issues resolved through policy or administrative action

The following issues were raised during the scoping process and are satisfied by an existing policy or administrative action and will not be addressed further in this plan.

## 1. Minerals Management

- How will mineral development be managed?

**Rationale:** There are no mining claims, mineral leases or mineral materials disposal sites within the wilderness area. The Arizona Desert Wilderness Act of 1990 withdrew the area from mineral entry and closed the area to mineral leasing and mineral material disposals.

## 2. Water Rights

- How will BLM ensure rights to water within the wilderness?

**Rationale:** Federal reserved water rights were created for each wilderness by the Arizona Desert Wilderness Act of 1990. The priority date of these rights is the date of the wilderness designation.

Water sources within the wilderness will be inventoried, quantified and notification submitted to the Arizona Department of Water Resources.

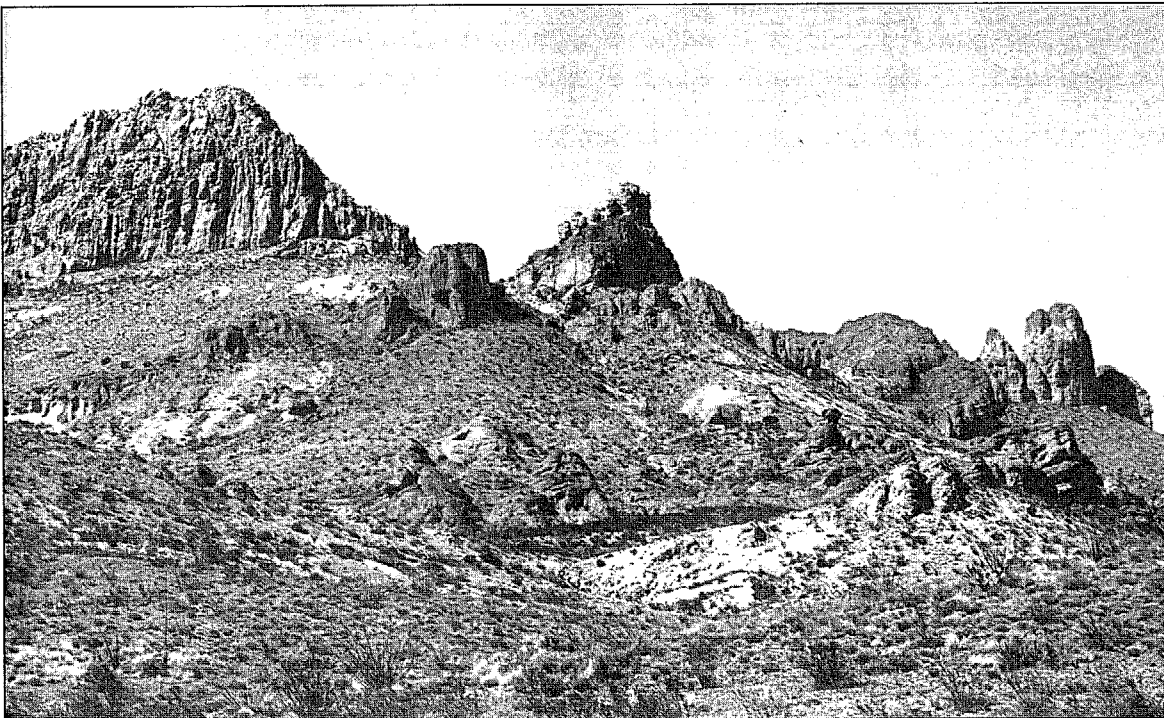
## 3. Effect of Wilderness Designation on Livestock Grazing

- Will livestock grazing be eliminated or reduced due to wilderness designation?

**Rationale:** The Wilderness Act allows grazing to continue where established prior to designation. Adjustments in the number of livestock will be based on BLM range monitoring studies and allotment evaluations.

## 4. Threatened and Endangered Species

- How will threatened and endangered species be managed?



Rugged rock outcrops are a common feature in the Peloncillo Mountains Wilderness.

**Rationale:** Suitable habitat for threatened and endangered species occurs in the wilderness. These species and any new listings of threatened or endangered plant or animal species will be managed in accordance with the Endangered Species Act of 1973 and BLM Manual 6840, 8560.34 and 8560.35.

#### 5. Cultural Resources

- How will scientific use of cultural resources be managed?

**Rationale:** Cultural resources having scientific value are allocated to scientific use. Proposals for study will be authorized on a case by case basis guided by existing policy in BLM Manual 8560.32 and subject to compliance with section 106 of the National Historic Preservation Act of 1966.

#### 6. Law Enforcement and Emergency Services

- Will access for law enforcement or emergency services be allowed?

**Rationale:** Wilderness management policy and regulations (BLM Manual 8560.39 and 43 CFR 8560.3) provide for emergency law enforcement and administrative access. Historically, there have been no law enforcement or other emergency situations in the Peloncillo Mountains Wilderness that have required mechanized or motorized access. In the

unlikely event of a problem, existing policy guidance is adequate to address each situation on a case-by-case basis.

#### 7. Reintroduction of Indigenous Species

- Will extirpated indigenous species be reintroduced?

**Rationale:** The Peloncillo Mountains are historic habitat for several indigenous species that were extirpated from the area. If, in the future, the Arizona Game and Fish Department finds that the area is suitable for reintroduction, this would be compatible with wilderness management. Details of where and how species would be released will be addressed on a case-by-case basis.

## C. Issues beyond the scope of this plan

#### 1. Access

- What is being done to gain access to the wilderness in Doubtful Canyon?

**Rationale:** While adequate legal and physical access currently exists to the wilderness, BLM is working to acquire additional legal access across private lands adjacent to the wilderness. This issue is not specifically related to wilderness and gaining access to this area has been identified in the Safford District Resource Management Plan.

## Part IV — Management Strategy

The issues carried forward in this plan described in part III are the focus of this management plan. The issues are evaluated along with the goals of wilderness management by an interdisciplinary team. Objectives are then developed by the team to address the issues in a way that is consistent with the goals. Management actions designed to achieve the objectives are laid out. This plan will concentrate only on these specific priority issues. Future proposals for programs that do not require specific objectives or actions will be processed according to existing wilderness policy. This will allow the plan to concentrate on the specific priority issues for the Peloncillo Mountains Wilderness.

One of the specific priority issues is defining standards for the vegetative resource and appropriate studies to measure progress toward achieving these standards. Grazing, watershed, wildlife, and fire management are all important factors in achieving desired conditions. For this reason the objectives for management of vegetation will address not only vegetation but grazing, wildlife, and fire management as well. Management of each of these are interrelated and dependent upon each other. The objectives for the management of vegetation were developed according to the potential for each ecological site.



# Part V — Wilderness Management

This section of the plan resolves the issues that have been identified in Part III of the plan. Objectives that are established can be linked back to the issues. Following the objectives, a series of management actions and rationales are presented. This section also includes discussion of the monitoring needed to assure progress is being made toward achieving objectives.

## Objective 1. — Preservation of Wilderness Values.

Maintain or improve naturalness in the Peloncillo Mountains Wilderness over the life of the plan by:

- Using non-motorized and non-mechanized means to inspect all range, wildlife, and cultural developments.
- Using non-motorized and non-mechanized means to maintain all range, wildlife, and cultural developments except Millsite Spring, Goat Dam, and the Horseshoe Canyon and Horsefoot Mountains bighorn sheep waters. Maintain these four exceptions using the minimum tool which may include motorized equipment.
- Minimizing low level aircraft use (below 2000 feet above ground level).
- Reducing the visual and wilderness impacts of 3 water developments.
- Maintaining current opportunities for primitive recreation.

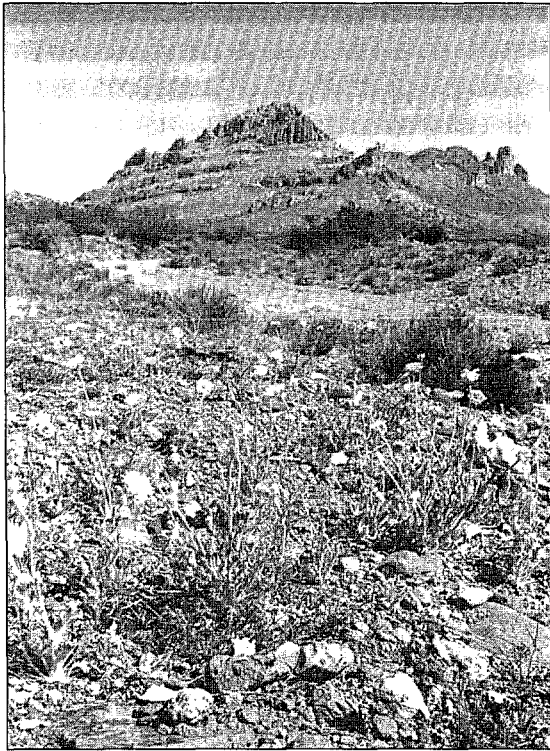
- Minimizing the visual impact of camping in Horseshoe, Millsite, Little Doubtful, and Ward Canyons and the unnamed canyon in T.11 S., R.31 E., Section 32 by removing all campsites in excess of three per canyon.
- Eliminating unauthorized vehicle entry from approximately 15 violations annually to zero.

**Rationale:** This objective addresses management issue 1 and its associated concerns. Meeting this objective will assure attainment of all 4 national wilderness goals.

### Management Actions

1. Add as a condition for each grazing permit that inspection and maintenance of all range developments except Millsite Spring will be accomplished using non-motorized and non-mechanized means.
2. Add as a condition for the High Lonesome grazing permit that inspection and maintenance of Millsite Spring will be accomplished using non-motorized and non-mechanized means. Reconstruction will be done using a motorized cement mixer and a pickup truck to transport materials to the site.

**Rationale:** Millsite Spring (Project #1143) in T12S, R32E, Section 14 has a cement tank and pipeline. The spring is currently in poor condition and reconstruction of the concrete storage tank and pipeline from the spring to the storage tank is necessary. The reconstructed



A view into the wilderness from along the southern boundary.

cement tank will then last about 20 additional years.

Use of a vehicle to ferry in supplies and equipment will be authorized for reconstruction activities. Estimates of needed materials and equipment are 100 bags of redimix cement, 20 twenty-foot pieces of five-eighths inch rebar, a gasoline powered cement mixer and 10 four-by-eight foot sheets of three-quarter inch plywood. Routine maintenance following the reconstruction will occur about every two years on foot or by horseback. This may also require packing in of redimix concrete and water to repair any cracks that develop.

A pickup truck and motorized cement mixer have been determined to be the minimum tool for the reconstruction project.

3. Clean out the pipe through Goat Dam. A motorized auger, transported to the

site by pack animal, may be used. Routine maintenance and inspection will be accomplished using non-motorized and non-mechanized means.

**Rationale:** Goat Dam (Project # 5258) in T12S, R32E, Section 21 is a large cement and rock dam. The dam has a maximum height of 13.5 feet and is 38 feet long and 38 feet wide. Construction date is not known but it may be from the early 1900s. A two-inch pipe at the bottom of the dam is reduced to a one-inch PVC pipe and carries the water to a small concrete drinker about 78 feet away. In 1991, the one-inch steel pipe was replaced with a one inch PVC pipe and then freeze proofed (wrapped with fiberglass and then covered with three-inch sewer pipe).

The status of the two inch pipe through the dam is unknown. However, it is highly probable this pipe will need to be cleaned out in the future. This type of operation will require motorized auger brought in by horseback. It is expected this type of operation will be required once every five years.

A motorized auger is determined to be the minimum tool for this operation.

4. Maintain Midway Cave cultural resource enclosure by nonmechanized and nonmotorized means. Periodic inspections approximately six to twelve times a year will be conducted on foot.

**Rationale:** The enclosure is less than 100 yards inside the wilderness boundary. The eight foot high, 594 foot long chain link fence was constructed to protect cultural resources. Materials for maintenance can be transported by vehicle to the wilderness boundary and then packed into the site. Maintenance will consist of

minor repair of the chain link fence by replacing damaged sections. Maintenance would also be conducted following vandalism.

5. In accordance with the MOU between the Arizona Game and Fish Commission and the BLM, the Arizona Game and Fish Department will, whenever possible, schedule its activities according to the following guidelines:

- conduct one annual low level bighorn sheep census flight on a weekday between September 1 and November 30.
- conduct one annual low level big game species monitoring flight on a weekday between December 1 and February 28.
- conduct monthly 2 hour low level fixed wing radio telemetry monitoring flights for bighorn sheep on weekdays.
- in the event of a radio collared sheep death (within 24 hours of death), land a helicopter to retrieve the sheep.
- in the event a sick sheep is observed during a helicopter flight, a helicopter may land to collect blood samples.

**Rationale:** Allowing the wildlife operations as outlined will assure that necessary wildlife data is gathered to assure proper management with the least impact to the naturalness of the wilderness.

6. Remove the small masonry dams, pipelines, and fiberglass storages at the Horseshoe Canyon and Horsefoot Mountain bighorn sheep waters and

replace these facilities with slickrock dams. The new dams may be made of native rock and cement and constructed to blend in with the surroundings. A helicopter may be used to transport materials for the new slickrock dams and to remove the old storages from the sites. Routine maintenance and inspection will be accomplished using non-motorized and non-mechanized means. Should staffing, funding, design considerations or other factors prevent removal and replacement as described above, a helicopter could be used to replace the fiberglass storages should old fiberglass storages fail.

**Rationale:** Replacement of the two wildlife waters using native materials will improve naturalness by lessening the visual impacts of the current facilities as well as decreasing the maintenance requirements and eliminating the need to use motorized vehicles and equipment for maintenance. The new wildlife waters will also assure that adequate water will be available for bighorn sheep and other wildlife. The option to replace the fiberglass storages should they fail, with new fiberglass storages, will provide the flexibility to assure that adequate water will be available for bighorn sheep and other wildlife. This option will maintain current visual and wilderness values of the area.

7. Replace the steel trough at Canteen Springs using native material and cement. Pack in materials for the new trough on horseback or gather them on site. Complete the project with hand tools. One helicopter flight will be allowed to remove the old materials from the site.

**Rationale:** Replacement of the range development using native materials will improve naturalness by lessening the visual impacts of the current facility as well as decreasing the maintenance requirements and eliminating the need to use motorized vehicles and equipment.

8. Do not develop any recreational facilities including new trails or trailhead facilities or establish any group size limits.

**Rationale:** Low visitor use does not justify developing facilities or establishing group size limits.

9. Make specific Peloncillo Mountains Wilderness information available without promoting or advertising the area. Develop a map for public distribution on request for the Peloncillo Mountains Wilderness. Emphasize the "Leave No Trace", "pack-it-in, pack-it-out", and similar back-country use concepts in all printed material.

**Rationale:** Indirect management techniques are used to allow visitor freedom, preserve solitude, be consistent with public demand and with BLM's staffing levels.

10. Install and maintain wilderness boundary signs at all publically accessible points of entry and where the boundary borders private land. If signing is not adequate to eliminate unauthorized vehicle entry, install physical barriers outside the wilderness.

**Rationale:** Identification of the wilderness boundary through proper signage will eliminate unintentional unauthorized vehicle use.

11. Remove all campsites in excess of three in Horseshoe, Millsite, Little Doubtful, and Ward Canyons and the unnamed canyon in T.11 S., R.32 E., Section 32 twice a year. Lightly used sites would be the first to be removed.

**Rationale:** The identified areas are used for camping during hunting seasons and are all close to the wilderness boundary. Currently there are several campsites that have been historically used during hunting seasons. Removal of campsites will occur when more than three campfire rings develop to assure wilderness values are protected.

### Monitoring

1. Monitor Horseshoe, Millsite, Little Doubtful, and Ward Canyons and the unnamed canyon in T.11 S., R.32 E., Section 32 for camping impacts twice a year, once prior to the fall hunting (approximately Oct. 1) season and once following the hunting season (approximately Feb. 1).

**Rationale:** Most of the camping impacts are associated with hunting activity in the wilderness. Therefore, monitoring and cleaning up campsites immediately prior to and following hunting seasons was chosen.

2. Conduct wilderness patrols monthly to check condition of boundary signs and compliance with this plan. Routinely patrol known archaeological sites on foot or horseback.

**Rationale:** The level of monitoring is commensurate with the low visitor use.

3. Field check range development maintenance for compliance with specified minimum tools.

## Objective 2. — Management of Vegetation.

Manage ecological condition during the life of the plan by:

- Maintaining 17,282 acres of volcanic hills site in high seral stage.
- Improving 462 acres of volcanic hills site from mid to high seral stage.
- Improving 90 acres of loamy upland from mid seral to high seral stage.
- Maintaining 359 acres of clay upland site in potential natural community condition.
- Improving 44 acres of deep sand site from low seral to mid seral condition.
- Maintaining 1,015 acres of limy

upland in high seral condition.

- Maintaining 46 acres of basalt hills in high seral condition.
- Maintaining 142 acres of clay loam upland in high seral condition.

**Rationale:** This objective addresses Issue 2 and its associated concerns. Meeting this objective will help attain national wilderness goals #1 and #4.

In the particular ecological sites found in the Peloncillo Mountains Wilderness, maintaining sites in high seral stage and increasing other sites to the next higher stage maintains or increases plant and animal diversity and density. The exception to this is the clay upland site which will be maintained in potential natural community condition. Although this site is not diverse, the vegetation associated with this seral stage acts to prevent active soil erosion in swale areas.



A juniper lined canyon in the wilderness.

Improvement in seral stage will lead to a reduction of shrubs and half shrubs with a concurrent increase in grasses. The subsequent reduction in shrubs will provide a plant community with increased species diversity to improve wilderness values. These plant communities have experienced an increase of shrubs which are the result of historic overgrazing before the turn of the century. This one time burn will reduce shrubs and allow future naturally occurring fires to play their natural role in ecosystem maintenance.

Choosing the particular seral stages was based on the fact that current climatic conditions and the slow rate of vegetation composition changes exhibited in semi-arid environments preclude vegetative change greater than that stated in objective #2. Change from a low seral stage to a mid seral stage will occur faster than a change from high seral stage to potential natural community due to the fact that low seral stages have few of the desired species and therefore have much opportunity for change. High seral stages have most of the potential plant species present and therefore do not have the opportunity to add new species.

### Management Actions

1. Limit utilization to an average of no more than 40% over a period of at least three years. Remove livestock at any time utilization levels on key forage species exceeds 60%.

**Rationale:** Average forage utilization levels of 40% will assure maintenance and improvement of the ecological sites by providing sufficient seed sources to allow for the recruitment of new plants and increase in plant cover. Implementing this management action will also provide quality habitat for indigenous wildlife populations.

2. Use prescribed natural ignition fire to maintain volcanic hills, basalt hills, clay loam upland, and clay upland in high seral or better condition. Prescribed natural ignition fires within the wilderness will be allowed to burn within the following prescription:

Acceptable Prescription Range		
	Low	High
Temperature (Fahr.)	50	100
Relative Humidity (%)	5	40*
Windspeed (MPH)	0	20
Wind Direction	Any	

\*Natural ignition will not occur above 40 % RH.

- Use prescribed burning to improve 462 acres of volcanic hills, 90 acres of loamy upland, and 44 acres of deep sand to the next higher seral condition. An operational site specific burn plan will be prepared prior to the prescribed burn and a smoke permit will

be obtained. Control lines will not be constructed, natural features will be used to confine the fire. Following prescribed burning the area will be evaluated to determine the length of rest from livestock grazing.

Acceptable Prescription Range		
	Low	High
Temperature (Fahr.)	70	105
Relative Humidity (%)	10	25
Windspeed (MPH)	0	20
Wind Direction	Any	

**Rationale:** Fire is a natural part of each of the ecological sites. Prescribed natural ignition fire and prescribed burning will lead vegetation to a higher seral stage. This will provide for more plant diversity and density while achieving a mosaic of plant communities.

- Suppress wildfires that are not within the acceptable prescription ranges or that threaten to escape the wilderness according to the operating guidance listed in Appendix B.

### Monitoring

- One pace frequency transect in each ecological site will be read every three years to monitor changes in plant composition.

**Rationale:** Pace frequency transects have proven to be accurate indicators of vegetation change. These transects will give important data to determine the direction of vegetation change, particularly with regard to increase or decrease in perennial grasses.

- Map utilization zones annually for all allotments within the Peloncillo Mountains Wilderness during the first three years of this plan to ensure utilization limits are not exceeded. Utilization will then be conducted once every three years if livestock management practices remain unchanged and objectives are being met. Changes in either parameter will require yearly utilization monitoring.
- Photo trend plots and species composition studies will be established on prescribed natural fires and prescribed fires to monitor results of burns. Monitoring frequency will be coordinated to coincide with other established utilization and frequency studies.

**Rationale:** Photo trend plots and species composition studies on burned areas will be used to determine if ecological sites are moving toward the next higher seral stage.

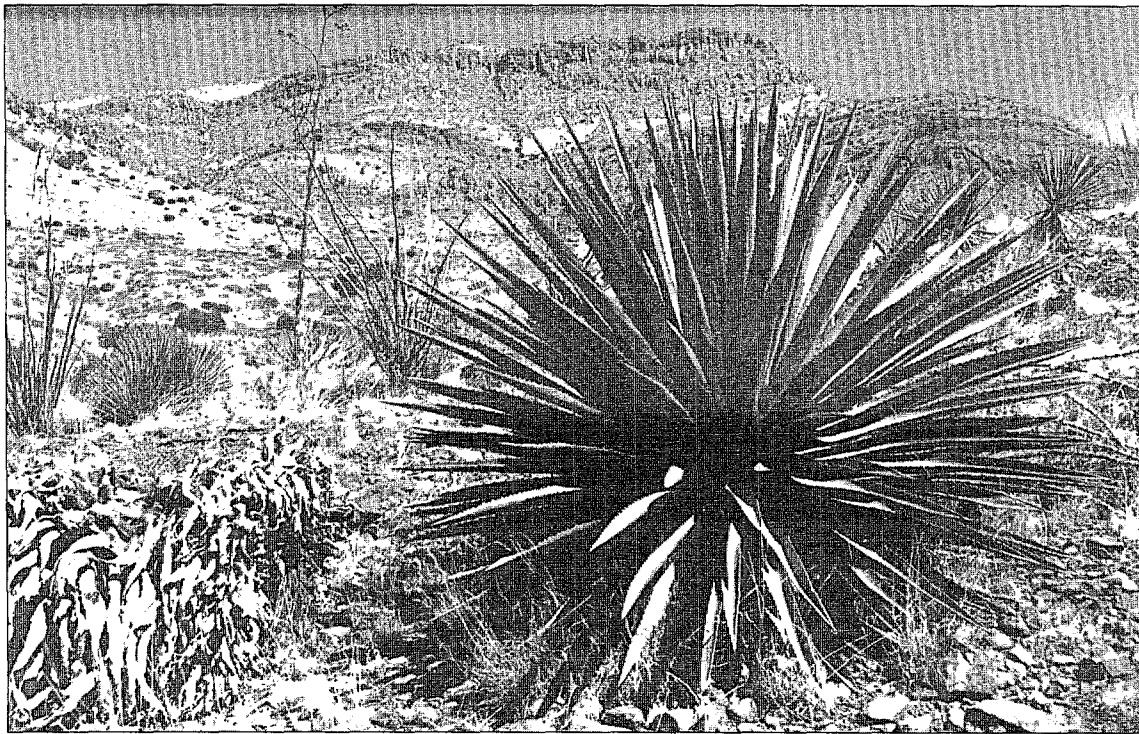
4. Map ecological sites on entire wilderness area at 5 and 10 years after acceptance of final plan to determine current status and success of management actions.

**Rationale:** An ecological site inventory determines plant composition at a given point in time. Comparing that information with previous inventories indicates changes in ecological condition and progress toward objectives.

5. All prescribed fires, natural and management ignited, will be monitored

daily to determine whether the fire remains in prescription.

**Rationale:** Bureau policy (IM 90-531) requires the line officer who is responsible for executing the prescribed fire plan to certify in writing that: (a) the fire is within prescription; (b) the fire will remain within the written prescription through the ensuing 24-hour period, given reasonably foreseeable weather conditions and fire behavior; and (c) adequate resources are available to suppress the fire should it exceed prescription.



Agave.



## Part VI — Plan Evaluation

The management plan is written to cover a period of 10 years. It will be evaluated annually:

1. to determine if objectives are being met.
2. to summarize and document the annual monitoring.
3. to assess the need to change parts of the plan no longer valid.
4. to evaluate actions that have been completed and plan the following years actions.
5. to estimate annual costs.

In addition to the annual review a formal public evaluation will be conducted after 5 years. This review will provide the public an opportunity to evaluate the monitoring data collected over the previous 5 years as well as the actions that have been completed. The public will also have the opportunity to identify new issues or concerns that may have developed. Needed revisions to the plan based on this evaluation will be available for public review before being implemented.

## Part VII — Plan Implementation & Cost Estimates

This section outlines timeframes and cost estimates for the planned actions. The actions are grouped into special projects and annual projects. The order of implementing planned actions may change as funding changes.

Special Projects	Material Cost/ Workmonth \$3400/Mo	Timeframe
Make established range development maintenance policy a condition of each grazing permit	.5 WM	Final Plan
Replace Horsefoot Mountain bighorn sheep water and remove old development	\$5,000 1.0 WM	Fiscal Year 1996
Replace Horseshoe Canyon bighorn sheep water and remove old development	\$5,000 1.0 WM	As Needed
Replace Canteen Springs water development and remove old development	\$1,000 1.0 WM	Fiscal Year 2000
Maintain Goat Dam wildlife water	.5 WM	Fiscal Year 1996 & 2001
Develop and distribute maps	\$1,000 1.0 WM	Fiscal Year 1997 & on-going
Install and maintain wilderness boundary signs	\$1,000 .5 WM	Fiscal Year 1995 & as needed
Use prescribed burning to improve 462 acres of volcanic hills, 90 acres of loamy upland and 44 acres of deep sand to the next seral stage	\$1,000 1.0 WM	Fiscal Year 1996

Annual Projects	Workmonth \$3,400/Mo	Timeframe
Conduct wildlife monitoring and census flights	.5 WM	Annually
Clean up/remove campsites	.5 WM	Twice a year
Remove cattle if utilization levels exceed 60% Limit forage utilization levels to an average of 40%	0 2.0 WM	limit exceeded on-going
Use prescribed natural ignition fire to maintain volcanic hills, clay loam upland, and clay upland in high seral or better condition	.5 WM	As occurs naturally
Suppress all wildfires not with approved prescriptions	N/A	As needed

## Part VIII — Public Involvement

BLM's public involvement process utilized the public at different planning stages in the development of this wilderness management plan. This included scoping of management issues and review of the draft management plan.

Two public meetings were held to help identify what the public perceived as management issues that needed to be addressed in the wilderness management plan. One public meeting was held on December 9, 1991 in Tucson and the second meeting was December 10, 1991 in Safford. Written comments were also accepted from the public for a 30-day period following the public meetings.

In addition to the public meetings, BLM has worked in coordination with the AGFD and local ranchers regarding wildlife and livestock issues in the wilder-

ness. Also a meeting was held with individuals representing the elders and Forestry Department of the San Carlos Apache Tribe.

The Draft Peloncillo Mountains Wilderness Management Plan and Environmental Assessment was distributed to over 500 interested individuals, groups, and governmental organizations by mail on August 5, 1994. During a 45-day public comment period following distribution of the Draft Plan, the BLM received a total of 18 letters.

The comment letters and responses have been made part of this document and are included in this section. Based on comments received several minor changes were made to the plan. All changes made to the plan are described in this section as well.

1

**ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.**

P.O. Drawer 7545 • Phoenix, Arizona 85011  
(602) 912-5300 • FAX (602) 957-4828

RECEIVED  
BLM SAFFORD DISTRICT

SEP 30 1994

SAFFORD, ARIZONA

September 19, 1994

Tom Schnell  
San Simon Resource Area  
Bureau of Land Management  
711 14th Avenue  
Safford, AZ 85546

Re: Draft Peloncillo Mountains Wilderness Management Plan and Environmental Assessment  
(EA-AZ-040-04-18)

Dear Mr. Schnell:

The Arizona Desert Bighorn Sheep Society, Inc. (ADBSS) has reviewed the above referenced document and would like to offer the following comments as part of the official public record.

ADBSS is concerned about the well being of the desert bighorn sheep population in the Peloncillo Mountains. We realize the existence of the Peloncillo Mountains Wilderness will impact the ability of your agency as habitat managers, and the Arizona Game and Fish Department as species managers, to manage desert bighorn sheep and their habitat.

1-1 Management Action Number 7 under Objective 1 of the draft wilderness management plan, and Number 7 of the Environmental Assessment's Proposed Action, make no allowance for water hauling by tanker truck or helicopter should the Horseshoe Canyon and Horsefoot Mountain bighorn sheep waters go dry. This consideration is important given the fact drought is a fact of life in Arizona. ADBSS requests both the draft wilderness plan and EA be amended to allow for mechanized water hauling by either truck or helicopter.

1-2 Neither the draft plan nor the EA make allowances for wilderness entry by motorized vehicles, whether truck or aircraft, for law enforcement purposes. ADBSS requests both the draft plan and EA be amended to allow for this type of motorized vehicle use. The recent poaching of desert bighorn sheep in the Peloncillo Mountains by two young Cochise County residents more than justifies the need for such a law enforcement consideration.

Page 2

1-3

Management Action Number 6 under Objective 1 of the draft wilderness management plan restricts wilderness overflights to weekdays. We are not aware your memorandum of understanding restricts overflights explicitly to weekdays. Given the number of big game surveys the Arizona Game and Fish Department schedules and flies in a year's time, scheduling for weekday flights only may pose a problem at some time in the future. ADBSS would support more latitude in scheduling overflights. We suggest weekend flights not be excluded, but only on a "must need" basis and with the intent of keeping disturbance of wilderness visitors to a minimum.

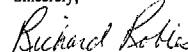
1-4

Management Action Number 7 under Objective 1 of the draft wilderness management plan speaks to replacing two existing, but poorly functioning, bighorn sheep waters with slickrock dams. Would these dam sites include shades, sandpoints, water delivery pipelines, other storage tanks and drinkers? What is the proposed capacity of the replacement structures? Without shade and without sufficient storage capacity, any pothole created by development of a slickrock dam may not meet the needs of the bighorn sheep. If the design for the proposed replacement structures at Horseshoe Canyon and Horsefoot Mountain has not been finalized yet, ADBSS respectfully suggests a project designed to provide reliable, consistent water supply to meet the needs of the bighorn sheep. The project should be constructed of quality materials sufficient to provide a maintenance free or low maintenance project. We will rely on the Development Branch of the Arizona Game and Fish Department to provide your office with a project design which meets all of these criteria.

The ADBSS would support the proposed action only with the addition of the four management actions suggested. We feel strongly these actions are necessary for the continued well being of the Peloncillo Mountains desert bighorn sheep population. We hope neither the water hauling or law enforcement management actions have to be exercised, but would feel more comfortable knowing these tools are available if necessary.

Thank you for the opportunity to comment. We would appreciate being notified of any additional management actions which would effect desert bighorn sheep in the San Simon Resource Area.

Sincerely,



Richard Robles, President  
Arizona Desert Bighorn Sheep Society, Inc.

37



## GAME & FISH DEPARTMENT

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Fife Symington  
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Herb Guenther, Yuma  
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Duane L. Shouse  
Deputy Director  
Thomas W. Spalding

September 27, 1994

Mr. Tom Schnell  
Bureau of Land Management  
Safford District Office  
711 14th Avenue  
Safford, Arizona 85546

RECEIVED  
BLM SAFFORD DISTRICT

SEP 30 1994

SAFFORD, ARIZONA

Re: Draft Peloncillo Mountains Wilderness Management Plan and  
Environmental Assessment

Dear Mr. Schnell:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced Draft Wilderness Management Plan (DWMP), and we apologize for the delay in our response. The following comments are provided for your consideration.

Page 1, Table of Contents

- 2-1 The Department recommends revision of this table to correct inaccurate page-listings.

Page 4, Livestock Grazing

- 2-2 As a member of the collaborative, interdisciplinary planning team for the High Lonesome Ranch, the Department is familiar with the team's operation. We believe it is important to distinguish this unusual and informal planning effort by the Center for Holistic Resource Management from the interdisciplinary team planning process the Bureau of Land Management (Bureau) has traditionally used in developing Allotment Management Plans (AMP). The Department does not believe that the scope of input received by the planning team adequately replaces the AMP process. We suggest that the recommendations of the team be considered as one of the management alternatives to be evaluated through the National Environmental Policy Act process.

The Department believes that management alternatives other than short duration grazing have not been thoroughly evaluated. Based on discussions at the past three team meetings, we believe it is probable that the grazing plan will focus on "animal impact" to manipulate range conditions on all pastures, including those within the Wilderness. The planning team has developed a statement of

Mr. Tom Schnell  
September 27, 1994  
2

desired future condition for the area, which the Department recommends incorporating into the DWMP. However, it is uncertain if the proposed method of achieving such a condition will be compatible with Wilderness values, including wildlife habitat.

The Department concurs with the Bureau's emphasis on maintaining and, where appropriate, increasing biological diversity on grazed lands. We recommend that measures for enhancing such diversity be developed, and that plans for the implementation and monitoring of those measures be integrated with the DWMP. The Department encourages the Bureau to develop AMP's as soon as practical for the Roostercomb and Lazy B allotments. We also believe that the AMP's for the Joy Valley and Little Doubtful allotments should be re-evaluated, and revised as needed.

Page 12, Wildlife

- 2-3 In the reference to desert bighorn sheep, the Department recommends that the term "wiped out" be changed to "extirpated". The DWMP's population estimate for bighorn sheep in the Peloncillo Mountains is not correct, and the accuracy suggested by the narrow range (95-100) is impossible to achieve using current survey methods. Based on the most recent winter survey, the Department estimates the population size to be 60-75.

- 2-4 The Department's Heritage Data Management System database does not contain any documented occurrences of special status species within the Wilderness. However, this lack of documentation does not indicate that such species are not present. We recommend that the U.S. Fish and Wildlife Service (USFWS, address below) be contacted for a list of special status species which could potentially occur in the Wilderness. We also suggest that this list be made a part of the DWMP, and that the Draft Environmental Assessment (DEA) evaluate the effects of any planned activities upon these species.

Mr. Sam Spiller  
State Supervisor  
Arizona Ecological Services State Office  
U.S. Fish and Wildlife Service  
3616 West Thomas, Suite 6  
Phoenix, Arizona 85019  
Phone: (602) 379-4720

- 2-5 The DWMP states that wildlife habitat management in the Peloncillo Mountains Wilderness is guided by the Gila-Peloncillo Habitat Management Plan (HMP), which was written nearly 15 years ago. Since that time, there have been substantial advances made in the field of wildlife management, including the movement of the Bureau and other Federal land management agencies away from single-species management, and toward ecosystem-based management. In addition, new initiatives, such as the Partners in Flight program, are providing direction more in line with ecosystem-based management. Because of this, the Department believes that the HMP's objectives are in need of revision.

Mr. Tom Schnell  
September 27, 1994  
3

2-6 The Department prefers to monitor radio-collared bighorn sheep once per month, but limitations in aircraft and personnel available occasionally preclude such a schedule. We recommend rewording the last sentence on page 12 to indicate that these monitoring flights are "... conducted monthly, provided aircraft and personnel are available."

Page 13, Wildlife

2-7 The Department recommends noting that the Horsefoot bighorn sheep water is not functioning at full capacity, but rather in a limited status.

Page 18, Issue 3.

2-8 In addition to adjusting livestock numbers, the Department recommends that rest rotation and seasonal grazing be utilized to improve range conditions.

Page 18, Issue 4.

2-9 The Department recommends that the DWMP address the inventorying and monitoring of the species of concern which could potentially occur in the Wilderness, as well as the effects of management activities on those species. We also suggest that suitable habitat and potential reintroduction sites for special status species potentially occurring in the area be considered when planning management activities.

Page 23, Preservation of Wilderness Values

2-10 The DWMP indicates that renovation of Millsite Spring and Zumwalt Tank will be required approximately every twenty years. Because of the slow recovery rates of semi-arid lands, the Department believes that rehabilitation of the access routes to these waters should be aggressive. We recommend that rehabilitation measures be added to the mitigation section of the DEA, and that the responsibility (Bureau or permittee) for reconstruction, maintenance, and site rehabilitation be clarified.

2-11 The Department requests that the DWMP specifically state that future wildlife water developments will be considered on a case-by-case basis, to be cooperatively evaluated by the Department and the Bureau. This wording is consistent with the Memorandum of Understanding (MOU) between the Bureau and the Arizona Game and Fish Commission, as well as other DWMPs recently developed by the Bureau.

Page 25, Management Action 6.

2-12 The Department recommends that the wording in this portion of the DWMP be clarified. This section implies that the MOU between our agencies specifies the number or timing of aerial big game surveys.

Mr. Tom Schnell  
September 27, 1994  
4

Guidelines in the MOU recommend that aircraft flights over Wilderness Areas be planned to minimize disturbance. Time of day and season of year are taken into consideration by the Department, and low-level flights are scheduled to avoid recognizable periods of heavy public-use. However, variations in weather conditions, aircraft and personnel availability, or sheep distribution sometimes require that surveys be conducted on weekends or extended beyond their customary time-frame.

Within the DWMP and DEA, the Department suggests that references to the number or timing of surveys be qualified by indicating that the scheduling guidelines are adhered to whenever possible. This will afford the Department greater flexibility in satisfying our responsibilities with respect to management of wildlife populations. In addition, we recommend rewording the opening statement of Management Action 6 to read "In accordance with the MOU between the AZ Game and Fish Commission and the BLM, the Arizona Game and Fish Department will, whenever possible, schedule its activities according to the following guidelines:". Current wording could give the impression that the subject wildlife management actions are conducted by the Bureau.

2-13 For consistency on a state-wide basis, we also recommend rewording the fourth item under Action 6 to read "in the event of a radio-collared sheep death, land a helicopter to retrieve a recent sheep mortality or the radio collar."

2-14 The last item of Management Action 6 is to "inventory to determine limiting factors for bighorn sheep." It is not readily apparent what precipitated this item, or if the Department will have a role in conducting the inventory.

Page 25, Management Action 7.

2-15 If the facilities at Horseshoe Canyon and Horsefoot Mountain are replaced with slickrock catchments, the Department requests that written consensus be obtained from our agency, as well as on-site coordination with appropriate Department personnel. As wildlife habitat improvements, these waters are directly related to the Department's responsibility to manage wildlife resources in the wilderness. The new design must ensure that the functions of the water developments are the same as, or greater than, the intended functions of the present facilities. It is especially important that the water be available on a year-round basis.

Page 28, Management of Vegetation

2-16 The first sentence of the second paragraph refers to an "improvement in seral stage". The Department recommends replacing the word "improvement" with the term "an upward shift" to more accurately describe the change.

Mr. Tom Schnell  
September 27, 1994  
5

The following statement also appears in the second paragraph:

2-17

*The reduction in shrubs will provide a more natural plant community which will increase species diversity for wildlife habitat, sustain allowed grazing use, provide soil stability and reduce soil erosion.*

This statement appears to imply that active vegetation management of Wilderness resources is being conducted to sustain a predetermined amount of grazing use. Although the Department concurs that the other issues addressed in the subject statement are logical improvements to the Wilderness Area, we do not believe that the maintenance of prior grazing levels should determine how Wilderness vegetation will be managed. We recommend rewording this statement to indicate that grazing is a tool that will be managed to insure that other vegetation goals are achieved.

The Department is concerned that the goal of the proposed vegetation management appears to be that of "...maintaining sites in high seral stage and increasing other sites to the next higher stage..." Although there are benefits to be gained from this strategy, we believe further consideration may be necessary to ensure that between-site diversity remains, preventing an overall loss of ecosystem diversity. If fire can return to its natural role in maintaining a mosaic of vegetation, then animal and plant diversity will most likely increase, and the use of prescribed fire to manipulate vegetation should not be necessary.

The Department believes that acknowledged uses of fire within the Wilderness include reducing the unnatural buildup of fuels and allowing fire to play its historical ecological role in ecosystem maintenance. However, the use of prescribed burning as a management tool to alter the seral stage of currently existing vegetation is not in accordance with the MOU. Under Item 14 of the Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness (Instructional Memorandum 86-665), vegetative manipulation is specifically addressed by the following statement:

*"Although additional benefits may result from man-ignited prescribed fire, vegetative manipulation will not be used to justify such fires."*

The Department does not believe that the prescribed burning proposed in the DWMP is consistent with this management policy.

2-18

**Page 29. Monitoring.** Because the emphasis of the vegetation transects is upon perennial grasses, which can react to climatic conditions and management activities on a yearly basis, the Department suggests that the transects be read annually. This will allow for the monitoring of both short and long-term effects on the vegetative communities.

Mr. Tom Schnell  
September 27, 1994  
6

The Department also recommends that vegetation utilization be monitored annually, regardless of the status of the allotment's livestock management practices. We believe that annual monitoring may be essential to determine whether or not "objectives are being met", depending on what objectives are under consideration.

Pages 33 and 34, Plan Implementation & Cost Estimates

2-19

As noted above, the Department is uncertain why the second item listed, limiting factors for bighorn sheep, has been included. In addition, it is not clear why Department wildlife monitoring and census flights are included in cost estimates that appear to be for Bureau activities.

Page 48, Item 7.

2-20

The Department does not recommend that the removal of materials from the existing water developments be specifically limited to one helicopter flight for each site. An additional flight may be justified, depending on the other materials to be removed in addition to the storage tanks.

Page 49, Alternative A, No Action

2-21

Consistent with the other Alternatives provided, Alternative A should indicate that wildlife management activities by the Department would continue in their current manner.

Page 49, Alternative B, Minimum Human Impact

2-22

Because the use of airspace over the Wilderness Area is not under the authority of the Bureau and beyond the scope of this DWMP, monitoring and surveying of wildlife by aircraft would continue under Alternative B.

Page 50, Impacts of the Proposed Action

2-23

Because rehabilitation of access routes to grazing developments is described in the DWMP, the Department believes that the impacts being rehabilitated should be described in this section.

Thank you for the opportunity to review and comment on this DWMP. If you have any questions, please contact me at 789-3605.

Sincerely,

*Ron Christofferson*  
Ron Christofferson  
Project Evaluation Coordinator  
Habitat Branch

RAC:GSS:GF:ss







5

SEPT. 16, 1994  
 BEAR SPRING RANCH  
 BOX 425  
 BOWIE, AZ 85605

DEAR SIR-

5-1 THE IMPORTANT GOAL SHOULD BE TO  
 MAINTAIN OPEN ACCESS TO THE  
 PELONCILLO WILDERNESS. THE TWO  
 ROADS THAT WE IN COCHISE COUNTY  
 HAVE USED OVER AT LEAST 10 YEARS  
 ARE THE EAST AND WEST DOUBTFUL  
 CANYON ROADS.

THE WEST ROAD WAS OBLITERATED BY  
 THE PERMITTEE WITHIN THE LAST  
 SEVERAL YEARS. THE EAST ROAD HAS  
 ALWAYS BEEN OPEN. I HAVE DRIVEN  
 RIGHT THROUGH DOUBTFUL CANYON  
 FROM WEST TO EAST AND VICE-VERSA  
 MANY TIMES. WE SHOULD AT LEAST  
 HAVE ACCESS TO THE WILDERNESS  
 BOUNDARY SO THAT WE CAN HIRE  
 FROM THERE.

ONLY THE BLM CAN TAKE THE  
 NECESSARY ACTION TO OPEN OR  
 RE-OPEN THESE ROADS. OTHERWISE,  
 WE WILL HAVE LOST ONE OF  
 OUR FAVORITE AREAS.

A WILDERNESS AREA IS ONLY  
 AS GOOD AS THE ACCESS TO  
 IT. IN THE CASE OF THE  
 DOS CABEZAS WILDERNESS, WE  
 LOST THE MAIN ACCESS FROM  
 THE EAST WHEN THE RANCHER  
 LOCKED THE GATE THAT HAS  
 BEEN OPEN FOR MANY YEARS.  
 ALTHOUGH THIS ROAD HAD BEEN  
 USED HISTORICALLY, THE BLM FAILED  
 TO TAKE ACTION

YOU MUST FIND WAYS TO KEEP  
 THESE ROADS OPEN - WE'LL TRY  
 TO HELP

REGARDS,

KENNETH COOPER

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 BLM SAFFORD DISTRICT

SEP 23 1994

SAFFORD, ARIZONA

6

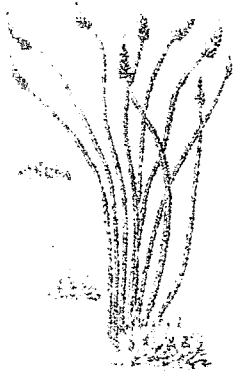
DEAR Mr. Schnell,

Thank you for allowing me to comment on the Peloncillo mts wilderness management Plan & EA. While I feel that Alternative B is the best as far as minimal human impact, Alternative A, the proposed action may actually be better for the environment by removing manmade additions from the wilderness area.

6-1 Grazing must also be eliminated as soon as possible, as well as prescribed burning to lead vegetation to a higher seral stage. This will provide for more plant diversity and density while achieving a mosaic of plant communities.

Thanks again for the chance to comment.

Sincerely  
John Panzera



7

September 16, 1994

P.O. Box 795  
Fort Huachuca, AZ 85613

Bureau of Land Management  
Safford District Office  
ATTN: Tom Schnell  
711 14th Avenue  
Safford, AZ 85546

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BLM-SAFFORD

SEP 20 1994

SAFFORD, ARIZONA

Dear Mr. Schnell:

This is in response to your letter inviting comments on the Draft Wilderness Management Plan for the Peloncillo Mountains Wilderness. My comments are from the perspective of a recreational user and trails advocate. I generally concur with your management actions that emphasize the preservation of wilderness values and primitive recreation. I agree with not developing recreational and trailhead facilities; however, I recommend you not rule out the development of new trails or improvement of existing trails. I believe that a good trails system is consistent with primitive recreation opportunities emphasized in the plan, and serves to enhance the user's appreciation and enjoyment of the wilderness. Concerning information materials, recommend the map you develop for users include location of water sources and their reliability to assist backpackers/hikers in planning their hiking routes.

7-1

7-2

Although it may be beyond the scope of your plan, I strongly encourage BLM to acquire additional legal access across private lands adjacent to the wilderness, particularly near Indian Springs Canyon and Little Doubtful Canyon.

Thank you for the opportunity to provide input to your plan.

Sincerely,

Steve Saway  
Adopt-a-Trail Coordinator  
Huachuca Hiking Club

8

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BLM SAFFORD DISTRICT

SEP 19 1994

SAFFORD, ARIZONA

Tom Schnell  
Bureau of Land Management  
711 14th Ave  
Safford, AZ 85546

Dear Mr. Schnell,

I am writing to comment on the Draft Wilderness Management Plan for the Peloncillo Mountains Wilderness. Thank you for publishing the well written document.

8-1 My concerns are mainly with the issue of Wilderness Management Part V; Objective 1, Preservation of Wilderness Values. If the objective is to "maintain or improve naturalness (and solitude) in the Peloncillo Mountains", then I do not agree with the exceptions for development of Millsite Spring, Zumwalt Tank and Goat Dam. I do not see how reconstruction of the cement tank at Millsite Spr. improves or maintains naturalness and is "necessary". Likewise, I do not see why Zumwalt Tank "needs to be cleaned" using a bulldozer and pickup truck. I suspect this tank is probably being filled naturally by sediments.

8-2 I most object to the exceptions for use of the so determined "minimum tools" which BLM is wanting to allow--mechanized and motorized means in the wilderness area--while other water projects without easy access (Horseshoe Canyon, Horsefoot Mt. and Canteen Spr.) are transporting materials by helicopter and pack animal. Also, if money is going to be appropriated to remove the masonry dams, pipelines and steel trough at these latter sites, why not restore these areas to a natural condition? I do not see how replacing these water projects is any improvement in naturalness of the wilderness.

Of course, it does all make sense in the light of the grazing allotments. I also wonder why the new "wildlife waters will assure that adequate water will be available for bighorn sheep and other wildlife" without mentioning cattle. If naturalness were really the ultimate goal, the sheep (even though reintroductions) would have to survive on natural sources, or not be there. (I realize that natural sheep survival may be impacted by modern human factors and developments between their natural range and natural water sources like the Gila River.) I hope that someday the wilderness could be managed for real natural values without the incumbent use and development values.

That fire is rationalized in the Management Plan as a "natural

4735 N Camino Antonio  
Tucson, AZ 85718  
14 Sep 1994

part" of the wilderness is commendable, and I agree with the policy of allowing prescribed natural ignition fires to burn. But I question the "use of emergency vehicles" and "power saws" at the discretion of the District Manager.

Sincerely,

*George M. Ferguson*

George M. Ferguson



9

Mark Fishbein  
315 N. Park Ave.  
Tucson, AZ 85719

Mr. Tom Schnell  
Bureau of Land Management  
711 14th Ave.  
Safford, AZ 85546

14 Sept. 1994

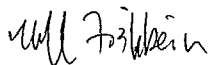
Dear Mr. Schnell:

I am writing to you in order to comment on the Peloncillo Mountains Draft Wilderness Management Plan and Environmental Assessment, dated July 1994.

9-1 I want to register support for your plan generally, but wish to express strong disapproval for one component of the plan. This is in regards to the proposed maintenance of Zumwalt Tank. As I understand your plan, the minimum tool necessary for the maintenance of this tank is a bulldozer plus pickup truck that will need to travel 1 mile into the Wilderness Area. I do not believe that bulldozers are commensurate with Wilderness management. The areas protected under our National Wilderness System are a small remnant of the natural areas of our nation and should be protected with the greatest vigilance. If a bulldozer is required to maintain Zumwalt Tank, then the small benefits gained from this tank (which could be obtained in other less stringently managed areas) should be abandoned for the sake of maintaining the integrity of the Peloncillo Wilderness. I believe that the presence of a bulldozer in the Wilderness would directly violate the intent of the legislation that designated this Wilderness Area.

Thank you for considering my statement.

Sincerely,

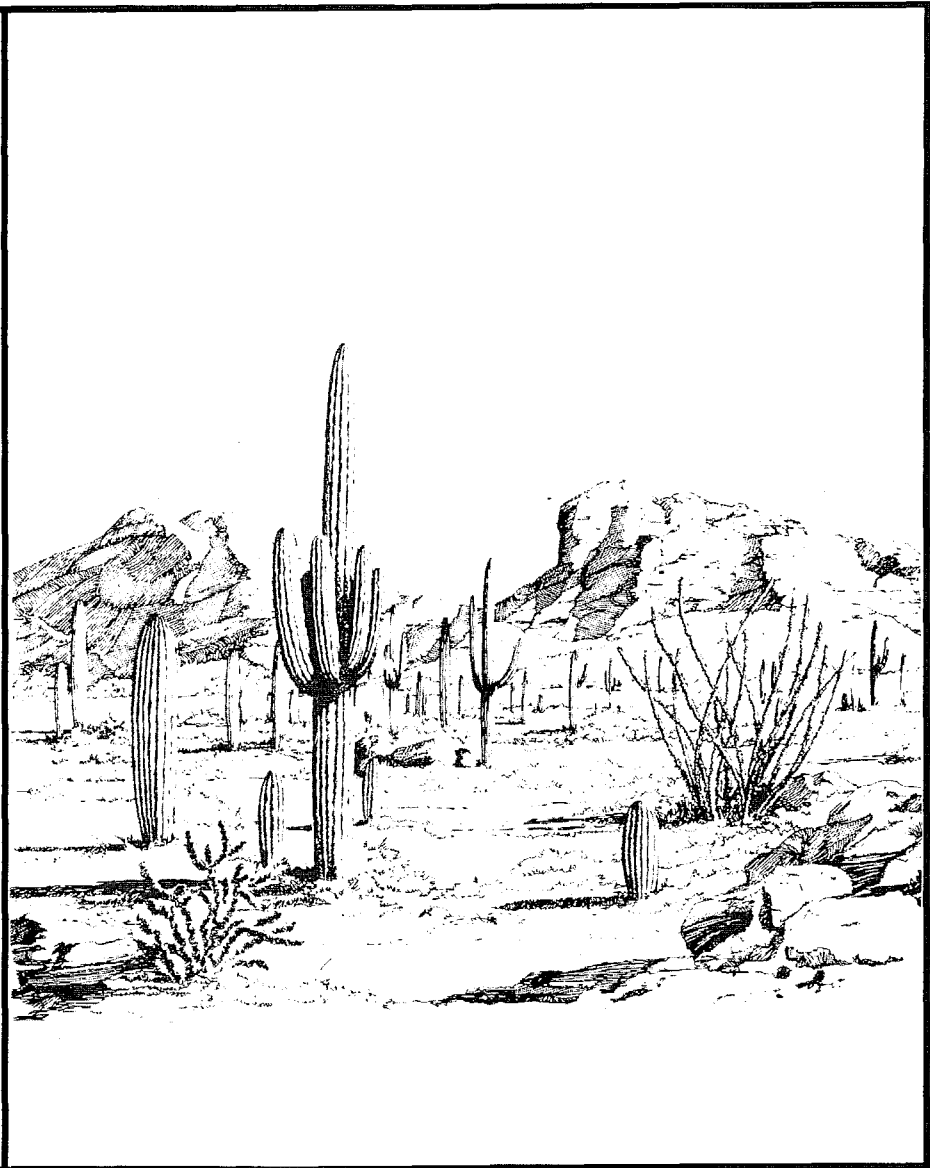


Mark Fishbein

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BLM SAFFORD DISTRICT

SEP 19 1994

SAFFORD, ARIZONA



10

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

SAN CARLOS AGENCY

P. O. Box 209

San Carlos, Arizona 85550



IN REPLY REFER TO:  
Natural Resources  
(602) 475-2285

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HAM SAFFORD DISTRICT

SEP 16 1994

SAFFORD, ARIZONA

SEP 15 1994

Mr. Tom Schnell  
Bureau of Land Management  
Safford District Office  
711 4th Avenue  
Safford, Arizona 85546

Dear Mr. Schnell:

10-1

We have reviewed the draft copy of the Wilderness Management Plan for the Peloncillo Mountains Wilderness. The San Carlos Agency has no comments specific to the content of the Plan. However, it should be noted that this Agency does not speak for the San Carlos Apache Tribe. In the spirit of self-determination, the Tribe itself is the entity that must be contacted.

Indeed, PL 93-638 (Indian Self-Determination Act) and the President's Executive Memorandum of April 29, 1994 direct all federal agencies to contact and enter into government-to-government relationships with Indian Tribes that may be affected by federal activities. And, as you know, the National Environmental Policy Act (NEPA) specifically states that federal agencies must consult with affected Indian tribes early in the NEPA process (NEPA Regulations at 1501.2(a)(2)).

In this regard, the San Carlos Apache Tribe has established a Tribal History Program that handles issues and concerns relative to the Tribe's history and culture. Other tribal departments are concerned with natural resources and social issues. Therefore, a federal agency should contact the appropriate tribal department whenever it is determined that the agency's activities may affect the San Carlos Apache Tribe. When in doubt of the appropriate department to contact, the agency can contact the Tribe through the Tribal Chairman's Office.

As mentioned above, the San Carlos Apache Tribe has a functioning Tribal History Program that we feel you should contact for input on your Draft Wilderness Management Plan.

-2-

Mr. Dale Miles, Tribal Historian, may be reached at:

Tribal History Program  
San Carlos Apache Tribe  
P.O. Box 0  
San Carlos, Arizona 85550  
(602) 475-2293

It is not our intent to chastise you or your agency but rather to enlighten you as to current policy and direction in regards to Indian tribes. The San Carlos Agency still wishes to be involved and consulted regarding your projects, but the San Carlos Apache Tribe must also be contacted during your public involvement and scoping activities. Should you have any questions or comments, you may contact Mr. Ross Denny, Natural Resources Officer, at (602) 475-2285.

Sincerely,

*Diana M. Squire*  
Superintendent



47

11

## GREATER GILA BIODIVERSITY PROJECT

9/8/94



TOM SCHNELL  
BLM  
SAFFORD DISTRICT OFFICE  
711 14TH AVE ~~SAFFORD~~  
SAFFORD, AZ 85546

THE FINAL PELONCILLO MOUNTAINS MANAGEMENT PLAN SHOULD CONSIDER THE UNIQUE BIOLOGICAL VALUES AND POSSIBILITIES OFFERED BY AN ECOLOGICALLY HEALTHY, ROADLESS AREA IN SE ARIZONA. THE PELONCILLOS COULD BE AN EXCEPTIONAL REFUGE FOR GOULD'S TURKEY, RINGED-NOSED RATTLE SNAKE, LONG-NOSED BATS, AND THE THICK BILLED PARROT. GIVEN THE LITTLE REMAINING WILDLAND LEFT ON THIS CONTINENT, AN AREA SUCH AS THE PELONCILLO MNT. WILDERNESS SHOULD BE MANAGED PRIMARILY FOR BIOLOGICAL DIVERSITY.

RECEIVED  
BLM SAFFORD DISTRICT

SEP 15 1994

SAFFORD, ARIZONA

PO Box 742  
Silver City, NM 88062  
Ph (505) 538-0961 Fax (505) 538-3540

*Kieran Suckling*  
KIERAN SUCKLING

12

College of Arts and Sciences  
Faculty of Science  
Department of Ecology & Evolutionary Biology

THE UNIVERSITY OF  
**ARIZONA**  
TUCSON ARIZONA

Tucson, Arizona 85721  
FAX: (602) 621-9190

Tom Schnell  
Bureau of Land Management  
711 14th Avenue  
Safford, Arizona 85546

13 Sept. 1994

Dear Mr. Schnell:

Thank you for sending me the Draft of the Peloncillo Mountains Wilderness Management Plan and Environmental Assessment. The inclusion of excellent maps in the Draft is a very good idea.

12-1 However, using mechanized equipment to maintain water developments is not a good idea. In fact, it runs counter to the objectives of wilderness designation. I am not on principal opposed to grazing within the wilderness, but the lease holder and the BLM must abide by the law. Particularly glaring is the proposed Zumwalt Tank (Project #5072) clean-out using a bulldozer. If the BLM is serious about a bulldozer being the "minimum tool," there will likely be some serious appeals to the final plan.

12-2 In the same spirit, water developments should be minimized, not improved. The focus on bighorn sheep may be to the detriment of other species, e.g., antelope. (For more information on this, try contacting Robert Schumacher, Refuge Manager, Cabeza Prieta National Wildlife Refuge, Ajo, Arizona.) The purpose of wilderness designation is not intensive management of game species.

Sorry for the scolding tone. Except for the criticisms above, it's a nicely laid out plan.

Sincerely,

*Jim Malusa*

Jim Malusa  
Research Associate

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BLM SAFFORD DISTRICT

SEP 15 1994

SAFFORD, ARIZONA



Tom Schnell  
 Outdoor Recreation Planner  
 Bureau of Land Management  
 711 14th Avenue  
 Safford Arizona 85546

Dear: Tom

First I want to THANK you for sending this report to me. Please accept my comments on the DRAFT Wildetness Management Plan for the Paloncillo Mountains Wildetness.

13-1

I would like to comment on Wildetness Goals on Page 15 what is says to manage the Wildetness area for the use and enjoyment of visitors. I drove into Horse shoe Ranch and up the road may be 1/2 mile past the fence to the Beautiful Oaks in wood canyon trail canyon. This is a road and camping area used by many visitors to the area before it became a wildetness. Now the road stops out in the middle of Hell. There is no trees or shade of decent place to camp or hunt from. If this little road was given any for thought it would have been chatty stamped that 1/2 mile up to the Oaks. I have stayed out in Hell one night to go up and walk on Goat Dam. We walked in the first time to see what it would take to fix it. By the time we want in to do the work the boundary was put in as a

Aug. 9, 1994

MR. ALBERT KREITZ  
 7222 PLACITA SINALOA  
 TUCSON, ARIZONA 85710

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AUG 12 1994

SAFFORD, ARIZONA

wildetness. A piece of plastic Drive Down in the middle of the road saying stop this is wildetness Beyond this signs when they had wildetness meetings I want to them all over the state. One of the last public meetings I want to was at the Arizona Game and Fish in Phoenix. That I ask them (the Committee) if they had the boundary survey and tied down to a league Discretion and that answer was it would not include MAN made roads.

I would like to see the B-L M. to spend as much time for the public (the visitors) to change the wildetness plans as they do for ranchers. I have seen many plans come up for revised and revised to left ranchers to do found up of other things which could be done by walking in or going in in horse back. This little road to a very little used camp site display by hunters is a good example of what could be done in this wildetness area so a few people could use it again under the shade of the Beautiful Oaks up that canyon. I have went up this canyon and worked all day and then hiked back out to drive home to Tucson because of no good place to camp another

NIGHT. AS IT IS NOW I WOULD  
HATE ASK ANY ONE TO GO DOWN WITH  
ME TO SEE OR WORK ON BOAT DAM  
AGAIN. UNLESS THIS ROAD IS  
CHARTERED TO LET THE PUBLIC  
IN TO USE THE CAMP SITES THEY  
HAD USED FOR YEARS. I AM A  
HUNTER WHO MOST OF THE TIME  
HUNTS OUT OF MY PICK UP TRUCK.  
AND I LIKE TO CAMP IN A  
BEAUTIFUL AREA IF I CAN. I  
ENJOY THE AREA AND THE CAMP OUT  
AS MUCH AS I DO THE HUNT.  
PLEASE GIVE SOME ATTENTION TO  
THE VISITORS WHO LIKE TO CAMP  
UNDER THE SHADE OF A BIG  
CAT IN THE FUTURE.

AL KREUTZ  
7318 PLACITA SINAI  
TUCSON ARIZONA 85710





OFFICE OF THE COMMISSIONER  
UNITED STATES SECTION

INTERNATIONAL BOUNDARY AND WATER COMMISSION  
UNITED STATES AND MEXICO

AUG 13 1994

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BLM SAFFORD DISTRICT

AUG 17 1994

SAFFORD, ARIZONA

Mr. Tom Schnell  
United States Bureau of Land Management  
Safford District Office  
711 14th Avenue  
Safford, Arizona 85546

Dear Mr. Schnell:

We appreciate the opportunity to review and comment on the Draft Peloncillo Mountains Wilderness Management Plan (Plan) and Environmental Assessment (EA), provided by Mr. Vernon L. Saline, San Simon Area Manager on August 5, 1994 (Reference 8560-045). The Plan describes the proposed management direction for the Peloncillo Mountains Wilderness.

The Peloncillo Mountains Wilderness is not located near enough to the United States and Mexico border to raise concerns regarding projects of the United States Section, International Boundary and Water Commission, United States and Mexico (USIBWC), and/or joint activities of the International Boundary and Water Commission, United States and Mexico (IBWC). We understand that this plan amends and supersedes all previous planning direction for this planning area. On May 14, 1993, the USIBWC provided comments on the EA and Interim Guidance addressing fire suppression measures and actions, general fire management objectives, resource condition, and coordination considerations relating to eight wilderness areas within the Safford District. The USIBWC at that time requested that consideration be given to additional coordination with us in instances where fire hazards exist in wilderness areas near the international boundary. We stated that this coordination will be helpful to us in notifying the Mexican Section of the IBWC (MxIBWC) of Bureau of Land Management (BLM) activities to suppress wildfires near the border and to possibly facilitate the logistics of your movement of personnel and emergency vehicles within the border areas.

The USIBWC also commented that we are interested in activities that could affect the hydrology, water quality, and ground-water resources of the several international streams located along the United States and Mexico international boundary. Since the effects of wildfire can impact these resources, notification of the USIBWC will help us in keeping the MxIBWC informed in the event of borderland wildfires. We continue to be interested in coordinating with BLM on these issues. Such notification, if BLM is in agreement, could be facilitated through the Division

THE COMMONS, BUILDING C, SUITE 310 • 4171 N. MESA STREET • EL PASO, TEXAS 79902  
(915) 534-6700 • (FTS) 570-6700

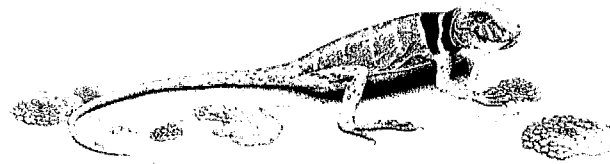
- 2 -

Engineer, Environmental Management Division, USIBWC, El Paso, Texas, 915/534-6704.

Thank you again for the opportunity to comment on the Draft Peloncillo Mountains Wilderness Plan and EA, and we appreciate your taking our comments into consideration. We continue to request that you keep us informed as you develop specific wilderness management plans, particularly for those areas proximal to the United States and Mexico international boundary.

Sincerely,

Conrad G. Keyes, Jr.  
Principal Engineer, Planning



15

TUCSON  
AUDUBON  
SOCIETY



Audubon Nature  
Shop

300 E. University  
# 120  
Tucson, Arizona  
85705

602/629/0510

conservation  
education  
recreation

August 22, 1994

Tom Schnell  
Bureau of Land Management  
711 14th Avenue  
Safford, Arizona 85546

Dear Mr. Schnell:

I am writing on behalf of Tucson Audubon Society in response to the Draft Wilderness Management Plan for the Peloncillo Mountains Wilderness. In general I applaud the effort you and your staff have made to address the issues of protecting the wilderness.

I remain concerned about the extent of grazing in the wilderness and the vagueness of the proposed management plans. For example, according to the Draft Plan, in the Braidfoot Allotment "the cattle are moved on a best pasture system with the permittee deciding when and where cattle are to be moved...The allotment has a temporary increase in livestock numbers which may become permanent in the future." It is impossible to assess the adequacy or inadequacy of the proposed plan because it does not appear to be a plan. As the US Forest Service has found, strict adherence to an approved management plan that mandates rotation of pastures is usually the only feasible way of overcoming historic abuse of public range lands. In order for the Draft Assessment to be adequate, far more specificity is required in the document and, by implication, a more rigorous plan and better enforcement are required of the BLM.

Similarly, the Assessment states of the High Lonesome Allotment that no AMP exists, but that a "planning process" for this allotment is being implemented using a "...process developed by the Center for Holistic Resource Management." Again, this plan is so vague as to be useless as part of an environmental assessment. It is also important that any system of rotation, including the intensive practices touted by the Center for Holistic Resource Management, take into consideration the effects of extended drought, such as that which has occurred in Arizona for the last sixteen months. Stocking rates based upon expected precipitation may be wildly optimistic in times of drought. All stocking rates should be conservative and based upon the assumption that droughts will occur.

I trust you will address this concerns in formulating the final Wilderness Management Plan and Environmental Assessment for the Peloncillos.

Sincerely,

*David Yetman*  
David Yetman  
Executive Director

RECEIVED  
BLM SAFFORD DISTRICT

AUG 25 1994

SAFFORD, ARIZONA

15-1

15-2

16

August 29, 1994

Bureau of Land Management  
711 14th Avenue  
Safford, AZ 85546  
Attention: Tom Schnell

Ref: Peloncillo Mountains Wilderness Management Plan and Environmental Assessment

Dear Sir:

I must compliment you on a basically very good plan. One area I have a problem with is that you did not address access, especially obtaining legal access into Little Doubtful Canyon which is a very important access point for recreation and it is important for wildlife. I realize some of the problems you have with the Klumps on that allotment but I do think it is important to state your goals even though the implementation may via implementation of another plan.

16-1

I do appreciate your having put forth the effort to have a good grasp of the soil, flora and fauna communities in the area. This is important to good management and baselining your activities. I also appreciate your concern for cultural sites in the unit.

16-2

One other concern is the apparent over reliance on bulldozers and pickups for tank maintenance versus manual and horse drawn equipment. I'm not sure bulldozers are the minimum tool in many cases.

16-3

I would also like to see more limits placed on grazing in the limited riparian zones.

Again thanks for a good overall plan and consideration of the above comments.

Sincerely,

*Jim Notestine*

Jim Notestine

PO Box 461  
Sonoita, AZ 85637

RECEIVED			
BUREAU OF LAND MANAGEMENT			
AUG 31 1994			
BLM SAFFORD DISTRICT			
	ACTION	DATE	INITIALS
DIRY MAIL			
EXT AFFAIRS			
ASSOC DIR			
REVIEW RES			
LEADERS			
NON-REVIEW			
REG ADVISOR			
OFFLINE			
ADMIN			
OPERATIONS			
TRNG			
EXT RELN			
TECHNICAL			
ADMINISTRATIVE			
FILE			DISCARD

17

**Santa Fe Pacific Pipeline Partners, L.P.**

888 South Figueroa Street, Los Angeles, California 90017  
213/486-7780 FAX 213/486-7724



**Santa Fe Pacific Pipelines, Inc.**  
General Partner

August 31, 1994

**SEPP, L.P.**  
Operating Partnership

**Don R. Quinn**  
Manager  
Pipeline Engineering

ENG 4-2-1 (930)  
94-239

Mr. Vernon L. Saline  
San Simon Area Manager  
U.S. Department of the Interior  
Bureau of Land Management  
Safford District Office  
711 14th Avenue  
Safford, AZ 85546

Dear Mr. Saline:

Re: **Draft Wilderness Management Plan - Peloncillo Mountain Wilderness**

In reply to your letter dated August 5, 1994, this is to advise that we do not have any facilities in the vicinity of the proposed project.

Sincerely yours,

D. R. Quinn

/mm

RECEIVED			
BUREAU OF LAND MANAGEMENT			
SEP 06 1994			
SAFFORD DISTRICT			
ACTION	REQ	INITIAL	DATE
LIST WORK			
EXT. ADDRESS			
ASSOC. DIR.			
RENEW RES.			
ADDRESS			
NON-RENEW			
RES. ADVISOR			
PLANNING			
ADMIN.			
OPERATIONS			
DATA			
SALES			
PERSONNEL			
TRAINING			
FILE			

18

**PELONCILLO MOUNTAINS  
WILDERNESS MANAGEMENT PLAN  
AND  
ENVIRONMENTAL ASSESSMENT**

MR. VERNON L. SALINE:

THANK YOU FOR ASKING FOR MY INPUT ON THE PELONCILLO Mtn. WILDERNESS.

- 18-1 No. 1 MY CHOICE WOULD BE ALTERNATIVE A - THE REASONS IS THE COST "US" THE TAX PAYING GOVERNMENT
2. YOU HAVEN'T TAKEN INTO THE E.I.S. THE CULTURE - CUSTOM OR ECONOMY OF THE PEOPLE THAT HAVE USED THE LAND FOR CENTURYS. I KNOW THIS IS PART OF N.E.P.A. TO DO SO.

MY WIFE + MYSELF ARE NATIVE ARIZONIANS + OUR FAMILY GO BACK IN AZ TO EARLY 1800'S OUR AGES ARE 67-74. NOW I WOULD LIKE TO ADVISE - FIRST WOULD BE TO

- 18-2 HAVE YOU PETITION CONGRESS TO GIVE A LITTLE FREEWAY + LET YOU CHERRY STEM ALL ROADS GOING INTO WILDERNESS TO LET ALL PEOPLES TO ENJOY THEIR PUBLIC DOMAIN. AS IT IS NOW YOU DISCRIMATE AGAINST HANDICAPPED - SENIORS + FAMILYS W/SMALL CHILDREN.

- 18-3 ALSO WATERS SHOULD BE KEPT IN REPAIR FOR WILDLIFE + CATTLE. THIS WOULD BE DONE W/HERRY STEM OF OLD ROADS WITHOUT EXPENSE OF CHOPPERS @ \$300 PER HR. AT TAXPAYERS EXPENSE. I WOULD IMAGINE RANCHER WOULD KEEP WATERS FLOWING?

YOU SAY YOUR ESTIMATE IS ONLY 200 VISITOR DAYS PER YEAR. THIS OR MANY MORE WOULD NOT IMPACT ON THIS ENVIRONMENT TO NOTICE.

HUMANS OR VEHICLES DO NOT STRESS WILD GAME AS THEY ARE VERY ADAPTABLE TO BOTH. THIS IS FROM EXPERIENCE OVER MANY YRS.

THANK YOU  
MEMBER  
YAVAPAI COUNTY  
PROPERTY RIGHTS  
COALITION

THANK YOU  
FRED J. LOWME  
FRED J. LOWME  
MEMBER  
PEOPLE FOR  
THE WEST

REPLY + FINAL  
DESIGN REQUESTED

# Part IX — Responses to Comment Letters

1-1. A section on emergency administrative and law enforcement access has been added to Part III - Issues resolved through policy or administrative action.

1-2. See response 1-1.

1-3. The wording has been changed to reflect your comment.

1-4. The Bureau will coordinate and cooperate with the Arizona Desert Bighorn Sheep Society, the Arizona Game and Fish Department and Bureau personnel to design a reliable and consistent water source that will be available on a year-round basis for bighorn sheep and other species of wildlife. The new design will assure that the functions of the water developments are the same as, or greater than, the intended functions of the present facilities.

2-1. The table of contents has been corrected.

2-2. Text has been revised to clarify the grazing situation in the wilderness.

2-3. Changes have been incorporated.

2-4. A list of potential special status species was obtained from the U.S. Fish and Wildlife Service and added to the wildlife section on page 12. Revisions were also made to the section on Threatened and Endangered Species in Part III - Issues resolved through policy or administrative action.

2-5. As stated on page 1, this plan amends the portions of the Gila-Peloncillo Habitat Management Plan applying to this wilderness area.

2-6. Change has been made.

2-7. Text has been revised to indicate current status of these developments.

2-8. Item 3 is responding to an issue raised by the public concerning effects of wilderness designation on livestock grazing. The issue was, whether livestock grazing would be eliminated or numbers reduced due to wilderness designation. The rationale states what criteria would be used to determine adjustments in livestock numbers.

2-9. See response 2-4. Also a section on reintroduction of indigenous species has been added to Part III - Issues resolved through policy or administrative action.

2-10. The final plan has been revised to indicate Zumwalt tank will be maintained using non-motorized and non-mechanized means. It is not anticipated that the activities associated with renovation of Millsite springs will require special mitigation measures. BLM feels natural rehabilitation of the access route will be adequate based on the frequency and expected impacts of this activity.

2-11. As indicated on page 1 of the plan new issues and proposals will be considered in the annual evaluation of the

plan. Arizona Game and Fish Department will be involved in this evaluation.

2-12. Text has been revised.

2-13. The 24-hour period following the death of a sheep is considered critical for gathering pathological information. Once this 24-hour time period has passed the Bureau believes a helicopter is no longer the minimum tool for this wilderness.

2-14. Based on comments and further discussion with the Arizona Game and Fish Department this action was determined to be unnecessary and has been deleted.

2-15. See response 1-4. Also an option to replace the fiberglass storages should they fail, with new fiberglass storages was added to the plan. This option will provide the additional flexibility to assure that adequate water will be available for bighorn sheep and other wildlife. This option would be chosen if staffing, funding, design considerations or other factors prevent removal and replacement with slickrock dams.

2-16. Terminology used is consistent with other BLM documents.

2-17. Text has been modified to reflect that the rationale for the one time prescribed burn is to allow for natural processes to function on these particular sites. The revised rationale is consistent with the Memorandum of Understanding between the Arizona Game and Fish Commission and the BLM.

2-18. BLM feels the monitoring schedule for the allotments are adequate.

2-19. As noted in response 2-14 this action has been deleted. The cost estimates included in the plan for conducting wildlife monitoring and census flights reflects BLM's cost associated with coordination with the Arizona Game and Fish Department involving these activities.

2-20. Text has been revised to indicate a helicopter may be used to remove materials from existing developments.

2-21. Change has been made.

2-22. Change has been made.

2-23. See response 2-10.

4-1. We agree with your rationale for the suggested change, however, BLM felt it was necessary to establish an upper limit so it is understood by everyone involved when cattle will be removed.

5-1. BLM agrees that access to the wilderness is important. As indicated in the plan, access to Doubtful Canyon was an issue identified as beyond the scope of this plan. BLM feels this issue is not specifically related to wilderness as BLM is already working to acquire legal access in this area.

6-1. The Peloncillo Mountains Wilderness was designated in the Arizona Desert Wilderness Act of 1990. Livestock grazing is referenced in the Act in Section 101, Designation and Management (f). It states, "(1) Grazing of livestock in wilderness areas designated by this title, where established prior to the date of the enactment of this Act, shall be administered in accordance with section 4(d)(4) of the Wilderness Act..." This section states that livestock are allowed to graze in wilderness. House Report 101-405 (Appendix

A to the Arizona Desert Wilderness Act of 1990) states that there shall be no curtailment of livestock grazing just because an area enters the wilderness system.

7-1. As stated in the plan low visitor use does not justify developing trails at this time. However, should this situation change, the need for developing trails would be considered during the annual evaluation of the plan.

7-2. Wilderness information developed for public distribution would include necessary information for planning a safe visit to the area. This would include information on the availability of water in the wilderness.

8-1. Facilities existing prior to wilderness designation are allowed to remain and be maintained if they are necessary for a use specifically permitted by the Wilderness Act. The minimum tool chosen to maintain the facilities is the one that least degrades wilderness values. The final plan has been revised to indicate Zumwalt tank will be maintained using non-motorized and non-mechanized means as stated in response 9-1.

8-2. Facilities existing prior to wilderness designation are allowed to remain in the wilderness if they are the minimum necessary for protection of the wilderness resource. The Bureau and the Arizona Game and Fish Department have determined these facilities are the minimum necessary. Refer to the rationale for Management Action 7 as to why replacing these developments will improve naturalness.

9-1. The final plan has been revised to indicate that Zumwalt tank will be

inspected and maintained using non-motorized and non-mechanized means. Since the development of the draft management plan the permittee has installed a water development outside the wilderness on private land that will serve as a more reliable water source. This will eliminate the need to maintain this development using a bulldozer and pickup truck.

10-1. The San Carlos Apache Tribal History Program has been contacted.

12-1. See response 9-1.

12-2. See response 8-2.

13-1. The Arizona Desert Wilderness Act of 1990 established the boundaries of the wilderness. Changing the boundaries of the Peloncillo Mountains Wilderness is beyond the scope of this Wilderness Management Plan.

15-1. The information presented in this section of the plan serves as brief overview of the current situation. Upon completion of this plan the wilderness objectives will be incorporated in individual AMPs. More detailed information on current grazing systems are contained in the AMPs and are on file in the Safford District office.

15-2. Text has been modified as stated in response 2-2.

16-1. See response 5-1.

16-2. See response 9-1.

16-3. Areas with riparian potential are located outside the wilderness.



18-1. As stated in the plan, this environmental assessment is tiered to the Safford District Final Wilderness Environmental Impact Statement. This document considered the impacts of wilderness designation on economic conditions and social elements.

18-2. See response 13-1.

18-3. All necessary wildlife and range developments will be allowed to be maintained using the minimum tool necessary to accomplish the job. The locations where a helicopter has been determined to be the minimum tool, no vehicular access exists.

# Part X — List of Preparers

The following list includes wilderness planning team members, reviewers, preparers, and contributors.

<b>Name</b>	<b>Position</b>
Manton Botsford	Archaeologist
James Gacey	Wildlife Biologist
Darlene Haegele	Realty Specialist
Dave Hall	Fire Management Officer
Larry Humphrey	Natural Resource Specialist
Jeff Jarvis	National Wilderness Program Leader
Ken Mahoney	Senior Technical Specialist - Wilderness
Kim McReynolds	Range Conservationist
Delbert Molitor	Hydrologist
Tom Schnell	Outdoor Recreation Planner
Larry Thrasher	Geologist
John Whitmer	Range Conservationist

## Appendix A — Range Developments

Name of Development	Project Number	Allotment/ Maintenance Responsibility	Location	Condition
Tule Well Fence	5290	Midway Canyon	T12S, R31E Sec. 2	Good
Allaire-Day Fence	5291	Midway Canyon/ Lazy B	T11S, R32E Sec. 31 T12S, R32E Sec. 5,6,8,16	Good
Tule Pasture Fence	4331	Midway Canyon	T12S, R31E Sec. 1	Good
Welker-Lyall Boundary Fence	0732	Little Doubtful Joy Valley	T12S, R32E Sec. 21	Good
Allaire-Barnes Fence	5294	Midway Canyon/ Joy Valley	T12S, R32E Sec. 18	Good
Barnes Ward Canyon Fence	5295	Joy Valley	T12S,R32E Sec.19 & 20	Good
Canteen Spring	5296	Joy Valley	T12S, R32E Sec. 32	Fair
Canteen Fence	5297	Joy Valley	T12S, R32E Sec. 32	Good
Barnes-Klump Fence	5298	Rooster-comb/ Joy Valley	T13S, R32E Sec. 6	Good
Smith-Ferris Fence	0494	Rooster-comb	T13S, R32E Sec. 6	Good
Jim-Dyke Fence	5299	Rooster-comb	T13S, R32E Sec. 6	Good

Goat Fence	5300	Rooster-comb	T13S, R32E Sec. 4	Good
McPeters Tank	3558	Rooster-comb	T13S, R32E Sec. 5	Good
Styveas-Lazy B Fence	0335	High Lonesome	T11S, R32E Sec. 33	Good
Stevens Interim Fence	1135	High Lonesome	T12S, R32E Sec. 4	Good
Horseshoe Fences	5307	High Lonesome	T12S, R32E Sec. 11	Good
Goat Dam Fence	5306	High Lonesome	T12S, R32E Sec. 16	Good
Engine Mountain Fence	5305	High Lonesome	T11S, R32E Sec. 32	Good
Millsite Spring	1143	High Lonesome	T12S, R32E Sec. 14	Poor
Wood Canyon Trail	None	High Lonesome	T12S, R32E Sec. 9 & 16	Good
Braidfoot Doubtful Fence	5071	Braidfoot	T12S, R32E Sec. 27 & 34	Good
Zumwalt Tank	5072	Braidfoot	T12S, R32E Sec. 34	Fair
Unnamed Fence	4201	Little Doubtful	T12S, R32E Sec. 22	Good
Unnamed Fence	4377	Little Doubtful	T12S, R32E Sec. 22	Good
Unnamed Fence	4392	Little Doubtful	T12S, R32E Sec. 27 & 28	Good
Welker-Lyall Fence	0732	Little Doubtful	T12S, R32E Sec. 28	Good

Lazy Boundary Fence	1138	Little Doubtful	T12S, R32E Sec. 23	Good
Unnamed Tank	3524	Little Doubtful	T12S, R32E Sec. 22	Good
Unnamed Tank	4196	Little Doubtful	T12S, R32E Sec. 27	Good
Unnamed Tank	4208	Little Doubtful	T12S, R32E Sec. 27	Good
Unnamed Tank	4458	Little Doubtful	T12S, R32E Sec. 22	Good
Lyall Tank	4347	Little Doubtful	T12S, R32E Sec. 22	Fair
Rubble Masonry Tank	0762	Little Doubtful	T12S, R32 Sec. 27	Good
Horsefoot Bighorn Sheep Water	5284	BLM	T12S, R32E Sec. 6	Poor
Horseshoe Canyon Bighorn Sheep Water	5286	BLM	T12S, R32E Sec. 15	Good
Goat Dam	5258	BLM	T12S, R32E Sec. 16	Poor
Midway Cave Enclosure	4120	BLM	T12S, R32E Sec. 7	Good

# Appendix B — Operating Guidance for Wildfire Suppression

The planned suppression actions herein are based on the prevailing fire danger, fuel conditions, past history of fires in the areas, and impacts on wilderness resources. The actions are divided into two separate fire hazard categories.

**Category One Fire Hazard:** This category covers a period of time when the relative fire danger is equal to low, moderate, or high. The classification is based on evaluation of fuel moisture, relative humidity, and wind speed. During the (low, moderate) fire danger periods, fires will be difficult to ignite and easy to control. During the (high) fire danger period of Category One, fires will be less difficult to ignite and harder to control.

**Category Two Fire Hazard:** This category covers a period of time when the fire danger rating is classified as very high to extreme based on an evaluation of fuel moisture, temperature, humidity, weather conditions, and predicted fire behavior. Heavy fuels are very dry and annual growth has cured. Fire behavior will be intense and may be erratic. Rapid rates of spread, crowning, torching, and spotting will occur. Fires may become serious and control difficult unless initial attack contains the fire at small acreages.

On the Safford District, fire danger ratings (low, medium, high, etc.) are generally based on the Burning Index (BI) category of the National Fire Danger Rating System. This rating system is the national standard and is based on input from strategically located Remote Automated Weather Stations (RAWS) throughout the district. Each wilderness area is represented by one or more of these stations.

Actual on the ground conditions may vary slightly in individual wilderness areas due to localized winds, temperatures variations and spotty annual precipitations.

## Planned Suppression Actions for the Peloncillo Mountains Wilderness

### Category One Fire Hazard

Establish ground and/or air surveillance as soon as possible to determine fire location, situation, spread potential, and opportunities for using natural barriers. Send initial attack fire crew and involve Resource Advisor (Resource Advisor may be on the fire line or in the fire office as deemed necessary by the Area Manager). Evaluate fire conditions, fuel, topography, and wilderness resource considerations to determine the appropriate suppression. Use hand tools only. Use of air tankers, helicopters, and portable pumps or chainsaws requires the approval of the District Manager. Emergency vehicle use in the wilderness area by District Manager approval only. Coordinate fire suppression efforts with BLM's Las Cruces District.

### Category Two Fire Hazard

Establish ground and/or air surveillance as soon as possible to determine fire location, assess situation, and initially direct suppression operations. Send fire crew and Resource Advisor immediately

to evaluate wilderness resource considerations, fire condition, fuel, and topography. Take swift, appropriate suppression actions to control the fire giving priority to techniques which least disturb the natural, cultural, and human-made features. Power saws and portable pumps may be

used with District Manager approval. Use of emergency vehicles, air tankers, and helicopters must be approved by the District Manager. Coordinate fire suppression efforts with BLM's Las Cruces District.

## Summary of Suppression Actions

Category One Fire Hazard	Category Two Fire Hazard
<ol style="list-style-type: none"> <li>1. Establish ground and/or air surveillance.</li> <li>2. Determine fire location, situation, spread potential, and possible natural barriers.</li> <li>3. Dispatch initial attack crew and resource advisor immediately.</li> <li>4. Incident Commander determines appropriate suppression action.</li> <li>5. Dispatch coordinates fire activity with BLM's Las Cruces District.</li> <li>6. Establish fire line using hand tools only.</li> <li>7. Use of chainsaws and waterpumps permitted only with District Manager approval.</li> <li>8. Use of helicopters and air tankers permitted only with the District Manager approval.</li> <li>9. Use of emergency vehicles in wilderness permitted only with the District Manager approval.</li> <li>10. Concentrate on keeping fire away from cave sites.</li> </ol>	<ol style="list-style-type: none"> <li>1. Establish ground and/or air surveillance.</li> <li>2. Determine fire location and assess situation.</li> <li>3. Initially direct suppression efforts from surveillance platform (ground or air).</li> <li>4. Dispatch initial attack crew and resource advisor.</li> <li>5. Incident Commander and resource advisor evaluates wilderness concerns, fire condition, fuel and topography.</li> <li>6. Dispatch coordinates fire activity with BLM's Las Cruces District.</li> <li>7. Take swift, appropriate suppression actions giving priority to methods that least disturb natural features.</li> <li>8. Use of chainsaws and pumps permitted only with District Manager approval.</li> <li>9. Use of helicopters and air tankers permitted only with District Manager approval.</li> <li>10. Use of emergency vehicles in wilderness permitted only with District Manager approval.</li> <li>11. Concentrate on keeping fire away from cave sites</li> </ol>



# Environmental Assessment

## Introduction

### Background

The Peloncillo Mountains Wilderness was designated by Congress on November 28, 1990. A management plan was developed to provide management guidance for the area and is in conformance with the Safford District Resource Management Plan (1991). This environmental assessment (EA) is tiered to the Safford District Final Wilderness Environmental Impact Statement (EIS) (1987). This EA analyzes the potential impacts of the proposed actions and management alternatives that were considered for the plan.

Background information which includes purpose, location, access, and general management situation is provided on pages 1-10 of the proposed Peloncillo Mountains Wilderness Management Plan.

### Purpose and Need for the Proposed Action

A series of actions were proposed to accomplish objectives that address BLM national wilderness goals and issues identified during development of the wilderness management plan. Proposed actions comply with mandates of the Federal Land Policy and Management Act of 1976, the Wilderness Act of 1964, and the Arizona Desert Wilderness Act of 1990, and are guided by wilderness management policy as outlined in BLM Manual 8560.

## Description of Proposed Action and Alternatives

### Proposed Action

The proposed action is the adoption and implementation of the Peloncillo Mountains Wilderness Management Plan. In general, the proposed actions would provide for the protection and enhancement of wilderness values within a 10 year timeframe. The proposal includes measures to protect existing natural resources and values as well as allowing for the maintenance of existing range, wildlife and cultural developments. Under the proposed action, opportunities for solitude and primitive unconfined recreation would be maintained. Proposed management actions that could have environmental effects are listed below.

1. Add as a condition for each grazing permit that inspection and maintenance of all range developments except Millsite Spring will be accomplished using non-motorized and non-mechanized means.
2. Add as a condition for the High Lonesome grazing permit that inspection and maintenance of Millsite Spring will be accomplished using non-motorized and non-mechanized

- means. Reconstruction will be done using a motorized cement mixer and a pickup truck to transport materials to the site.
3. Clean out the pipe through Goat Dam. A motorized auger, transported to the site by pack animal, may be used. Routine maintenance and inspection will be accomplished using non-motorized and non-mechanized means.
  4. Maintain Midway Cave cultural resource enclosure by nonmechanized and nonmotorized means. Periodic inspections approximately six to twelve times a year will be conducted on foot.
  5. In accordance with the MOU with AZ Game and Fish Commission:
    - conduct one annual low level bighorn sheep census flight on a weekday between September 1 and November 30.
    - conduct one annual low level big game species monitoring flight on a weekday between December 1 and Feb 28.
    - conduct monthly 2 hour low level fixed wing radio telemetry monitoring flights for bighorn sheep on weekdays.
    - in the event of a radio collared sheep death (within 24 hours of death), land a helicopter to retrieve the sheep.
    - in the event a sick sheep is observed during a helicopter flight, a helicopter may land to collect blood samples.
  6. Remove the small masonry dams, pipelines, and fiberglass storages at the Horseshoe Canyon and Horsefoot Mountain bighorn sheep waters and replace these facilities with slickrock dams. The new dams will be made of native rock and cement and constructed to blend in with the surroundings. A helicopter may be used to transport materials for the new slickrock dams and to remove the old storages from the sites. Routine maintenance and inspection will be accomplished using non-motorized and non-mechanized means. Should staffing, funding, design considerations or other factors prevent removal and replacement as described above, a helicopter could be used to replace the fiberglass storages should old fiberglass storages fail.
  7. Replace the steel trough at Canteen Springs using native material and cement. Pack in materials for the new trough on horseback or gather them on site. Complete the project with hand tools. One helicopter flight may be allowed to remove the old materials from the site.
  8. Do not develop any recreational facilities including new trails or trailhead facilities or establish any group size limits.
  9. Make specific Peloncillo Mountains Wilderness information available without promoting or advertising the area. Develop a map for public distribution on request for the Peloncillo Mountains Wilderness. Emphasize the "Leave No Trace", "pack-it-in, pack-it-out", and similar back-country use concepts in all printed material.

10. Install and maintain wilderness boundary signs at all publically accessible points of entry and where the boundary borders private land. If signing is not adequate to eliminate unauthorized vehicle entry, install physical barriers outside the wilderness.
11. Remove all campsites in excess of three in Old Horseshoe, Millsite, and Little Doubtful Canyons and the unnamed canyons in sections 20 and 32 twice a year. Lightly used sites would be the first to be removed.
12. Limit utilization to an average of no more than 40% over a period of at least three years. Remove livestock at any time utilization levels on key forage species exceeds 60%.
13. Use prescribed natural ignition fire to maintain volcanic hills, basalt hills, clay loam upland, and clay upland in high seral or better condition.
14. Use prescribed burning to improve 462 acres of volcanic hills, 90 acres of loamy upland, and 44 acres of deep sand to the next seral condition.
15. Suppress wildfires that are not within the acceptable prescription ranges or that threaten to escape the wilderness according to the operating guidance listed in Appendix B.

### **Alternative A - No Action Alternative**

Under the no action alternative, management guidance would be provided by the Wilderness Act of 1964, the Arizona Desert Wilderness Act of 1990, and national BLM Wilderness Management

Policy. No specific action would be taken to replace existing range and wildlife water structures with developments made of native materials. Visitor use would continue unmonitored and campfire rings would not be rehabilitated. Prescribed burning would not be used to change certain ecological sites to higher seral condition. All wildfires would be suppressed in the wilderness. Wildlife management activities by the Arizona Game and Fish Department would continue in their current manner.

### **Alternative B - Minimum Human Impact**

An emphasis on protecting the resources within the Peloncillo Mountains Wilderness from all human impacts would be the overriding goal of this alternative. No new range or wildlife developments would be allowed. Recreation use would be restricted or excluded, if necessary, to reduce or prevent human impact. Use of motorized equipment would not be allowed.

### **Affected Environment**

A description of the affected environment can be found on pages 1-14 of the Peloncillo Mountains Wilderness Management Plan and in the Affected Environment sections of the Safford District Resource Management Plan and the Safford District EIS.

### **Environmental Consequences**

The following critical elements have been analyzed and would not be adversely affected by the proposed action and alternatives:

1. Air Quality
2. Areas of Critical Environmental Concern
3. Cultural Resources
4. Prime or Unique Farmlands
5. Floodplains
6. Native American Religious Concerns
7. Solid or Hazardous Wastes
8. Water Quality
9. Wetlands and Riparian Zones
10. Wild and Scenic Rivers
11. Wilderness
12. Threatened or Endangered Species

### **Impacts of the Proposed Action**

Implementation of the management actions in the proposed action alternative would maintain or enhance the wilderness resources while allowing for use of the area to continue.

There would be short term impact to solitude from monitoring and removal of campsites that would be offset by long term benefits of enhancing and maintaining wilderness values and opportunities for primitive recreation.

Temporary impacts to solitude would occur during removal and replacement of the two wildlife waters and the range development. These impacts would be offset in the long term by reduced visual impacts of the new developments and maintenance requirements. The new

developments would also provide a more reliable source of water which would increase wildlife populations.

Aerial monitoring of wildlife species would have a temporary impact to solitude and naturalness. These monitoring flights would enhance wilderness values in the long term by assuring the opportunities to observe and hunt these species in a wilderness setting.

Installing wilderness boundary signs would prevent unauthorized motorized use of the area resulting in maintaining or enhancing wilderness values.

Maintaining and inspecting all range, wildlife, and cultural developments, excluding the four possible exceptions, by nonmotorized/nonmechanized means will enhance wilderness values.

Using motorized equipment for maintenance of the four possible exceptions will cause short term impacts to naturalness and solitude. These temporary impacts would only occur only once every 5 -10 years.

Using prescribed burning and prescribed natural fires would enhance wilderness values by increasing plant diversity and minimizing potential impacts from fire suppression activities.

### **Impacts of Alternative A - No Action**

Current conditions and opportunities would be maintained under this alternative. With this alternative, existing laws, regulations, and policies would be followed without an integrated management strategy. There would be no temporary impacts from replacing two wildlife waters and one range development or from monitoring recreation activities. In the long term, wilderness values would be affected by the continuing presence of these unnatural human developments and

the need for constant maintenance. Also, in the long term impacts to naturalness could occur from accumulation of campfire rings.

Temporary impacts to solitude would result from fire suppression activity as well as long term impact to naturalness from not allowing fire to play its natural role in the wilderness.

Not allowing prescribed burning for the identified ecological sites would result in not moving to the next seral stage. This would lessen plant diversity and density. Temporary impacts from prescribed burning activities would not occur.

Impacts from wildlife management activities would remain the same as the proposed action.

### **Impacts of Alternative B - Minimum Human Impact**

An emphasis on protecting the resources within the Peloncillo Mountains Wilderness from all human impacts would be the overriding goal of this alternative.

Restricting or excluding recreation use to reduce or prevent human impact would provide the most protection of wilderness values but could restrict personal choice in the full range of opportunities for primitive recreation.

Eliminating use of all motorized equipment would eliminate temporary impacts on opportunities for solitude during the use of this equipment and any long term impact to naturalness resulting from motorized equipment. However, eliminating use of all motorized equipment may limit spread and growth of bighorn sheep and other wildlife species.

Elimination of motorized equipment would cause permittees to adjust their operations, reducing efficiency and increasing operating costs.

### **Cumulative Impacts**

Cumulative impacts include impacts on the environment which result from incremental impacts of the proposed action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time.

Implementing the proposed action would reduce the potential for cumulative impacts to wilderness values from unmonitored recreation use and the related build up of campfire rings.

Replacing the two wildlife waters and one range development using native materials would reduce potential for cumulative impacts by significantly reducing visual impacts of these developments and reducing required maintenance on these developments.

The proposed minimum tool for maintaining existing range and wildlife developments also reduces the potential for cumulative impacts to wilderness values.

No other cumulative impacts have been identified with any of the proposed actions.

### **Mitigation**

There are no mitigation measures needed for the proposed action.

### **Consultation and Coordination**

Information about consultation, coordination, and public involvement can be found on page 35 of the Peloncillo Mountains Wilderness Management Plan.

**Finding of No Significant Impact/Decision Record**

Peloncillo Mountains Wilderness Management Plan

Environmental Assessment No. AZ-040-04-18

**Decision:** It is my decision to approve the Peloncillo Mountains Wilderness Management Plan. The plan establishes management direction for the Peloncillo Mountains Wilderness for a 10-year period.

**Finding of No Significant Impact:** Based on the analysis of potential environmental impacts contained in the attached Environmental Assessment, I have determined that impacts are not expected to be significant, therefore, an Environmental Impact Statement is not required.

**Rationale for Decision:** The plan provides for the continued maintenance of wilderness values and the rehabilitation of existing disturbances. Routine monitoring and yearly evaluations provide for modifications to the plan if a change in conditions requires them.

**Other Alternatives Considered:** The Proposed Action, Minimum Human Impact Alternative and No Action Alternative were considered.

**Mitigation/Stipulations:** All mitigation measures are incorporated within the proposed action.

Recommended by: *Dennis F. Salvo* 5/18/95  
Area Manager, San Simon Resource Area Date

Recommended by: *William J. Cant* 5/18/95  
District Manager, Safford District Date

Approved by: *[Signature]* 5-30-95  
State Director, Arizona Date

**UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
Safford District Office  
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Safford, AZ 85546**

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