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UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ARIZONA STATE OFFICE

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SAFFORD DISTRICT	(931)
ACTION	856
DIST. MGR.	1954
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August 26, 1987	
OPERS.	
GILA	KC
MANAGEMENT	
FILE	DISCARD

MEMORANDUM

To: District Manager, Safford District

From: Deputy State Director, Lands and Renewable Resources

Subject: Review of Final Draft Aravaipa Canyon Wilderness Management Plan (WMP)

The draft Aravaipa Canyon WMP reads well, subject to only a few minor items of concern. Please incorporate these comments, where appropriate, and then send revised pages to Jane Clossen (931) for typesetting.

Page 6 Insert after second sentence: The four areas are the canyon  
Para. 5 corridor, side canyons, tablelands and the canyon slopes.

Page 14 After second sentence, delete remainder of paragraph.  
Para. 3 (Herbicide use is not permitted at present time. BLM is writing an EIS for rangeland use of herbicides. Pending approval of the EIS by the Ninth Circuit U.S. Court, BLM cannot use herbicides.)

Page 40 Management Direction, 1. Management Policy, in third sentence, modify to read, ". . .date of wilderness designation, per Wilderness Act of 1964."

Page 59 Proposed Development, Replacement and Acquisition. Acquire two  
Parcels (160 acres) of Private Land \$20,000.

This needs justification in WMP to support the large acreage and funding needs. We understand the preferred acquisition method is by exchange and therefore can assume the funds are for WM's, or is it possible to acquire 160 acres for \$20,000? The question that needs to be addressed is - why does BLM need 160 acres when it appears 5 or 10 acres would be sufficient for both administrative sites.

Revise to reflect the need for the 160 acres (in the text of WMP) for the administrative sites. On page 59 give the estimates associated with acquisition via exchanges and then acquisition via purchases of the administrative sites. The least desirable alternative can be placed below in parenthesis to give management an idea of the possible cost (or savings) if the first alternative is not feasible.

Page 77 Within forth sentence, incorporate the fact that Commercial Use Permittee is also bound by party size maximum of 10.

Please call Jim Currihan if you have questions on these comments. We believe that if the revised pages are returned to Jane Clossen for typesetting by September 2, 1987 we may be able to have the Final WMP printed and back to you for release to the public in FY 87.

*Beaumont C. McClure*

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ARIZONA STATE OFFICE

8561 (931)  
1663F

MEMORANDUM

Date: March 31, 1987

To: District Manager, ~~Safford District~~

From: Deputy State Director, Lands and Renewable Resources

Subject: Review of the Draft Aravaipa Canyon Wilderness Management Plan (WMP)

The draft Aravaipa Canyon WMP is basically well done and informative. Writing a plan, especially a first WMP, is not an easy task. So please extend to your staff our appreciation for their efforts and professional approach in preparing this WMP.

The following comments are suggestions we feel would improve the WMP. We have purposely refrained from minor comments, and are looking more at statewide policy and consistency.

Often there are facts unknown to my staff which make the comment ineffective or not pertinent. Should this be the case, I would appreciate it if the specialists from the District and State Office work out between themselves any correction. In other words, if the following suggestions cannot be incorporated into the WMP as is, then discuss it with my staff specialist and reach an agreement, if possible.

General:

Our Writer/Editor has made some notes on the attached document to assist you with the final WMP.

ACW Location and Wilderness Map - the location map (page 3) does not stand out in relation to its importance in this document. An exploded view technique to highlight to wilderness would be helpful. The wilderness map (page 4) should be modified for clarity and turned to face to the right for easier reference. Larry Taddia (941) would be glad to help with cartographic work, given ample lead time.

Questioned by several staff is the trailing of livestock (cattle) through the Canyon and using livestock for vegetation management. However, we also note that livestock have been kept out of the Canyon since 1974. Which is correct? Have all the alternatives been explored to keep livestock out of the Canyon? The rationale for allowing any livestock in the Canyon should be explained.

Soil and Water:

Page 6 Paragraph three, (Water Resources), sentence beginning with "BLM has filed with the . . .". Insert the word "application" between "filed" and "with".

- Page 11 Water Management Objectives. Last Sentence. Prefer the word "obtain" be replaced with "assert and legally protect".
- Page 11 Current Situation, second paragraph, last sentence. The words "year around" should be "year round".
- Page 11 Current Situation, fifth paragraph. Please show a citation at the end of the fourth sentence to the instream study conducted by Turner and Tafanelli to read "(USFWS, 1983)". In Appendix 5, Bibliography, the citation would read "U.S. Fish and Wildlife Service, 1983. Evaluation of the Instream Flow Requirements of the Native Fishes of Aravaipa Creek, Arizona, By the Incremental Methodology. Albuquerque, New Mexico. This reference would better validate the BLM's request for instream flow rights. Delete the sentence in this paragraph beginning with "The water right" and replace it with "Approval of the application is currently pending with the State. If granted, the instream flow right would have a priority that precedes the date of establishment of the ACW."
- Page 12 Current Situation, last paragraph of the section. In the next to last paragraph, beginning on Page 11, it's stated that several factors potentially impact water quality in Aravaipa Creek. However, the last paragraph on Page 12 cites four studies of background chemical information on the creek. There should be a statement about the current physical and chemical condition of the creek based on all of these studies.
- Certainly, a conclusion can be drawn about the situation. Most BLM streams never receive the attention to water quality like Aravaipa has. Please address this, otherwise, we'll be monitoring water quality for no apparent reason.
- Page 12 Management Assumptions. New assumption. "Water in Aravaipa Creek is of suitable quality according to State surface water standards."
- Page 12 Management Assumptions, third assumption. Change "administratively unfeasible" to "practicably unfeasible".
- Page 12 Management Assumptions, New assumption. The following statement should be added to this section. It has been incorporated into plans developed by the Arizona Strip and should be included in this plan for consistency purposes.

"An implied Federal reserve water right was created when the ACW was designated. Established water rights existing under State law prior to creation of the wilderness area would not be affected by a Federal reserve water right claim. If unappropriated water is available, the amount of water claimed by BLM would be limited to the amount required to satisfy wilderness purposes."

The above statement should be followed with the additional statement in the management policy section.

"Water rights and waters currently used for domestic and stock watering purposes will be maintained. Additional development needs for water will be considered on a case-by-case basis according to wilderness management guidelines and policies of this plan.

Requests and/or approval for private control of water sources within the wilderness will be opposed by BLM.

BLM may, where State law permits, file for water rights on additional selected water sources in order to protect wilderness resources, threatened and endangered species habitat and recreational uses."

- Page 12 Management Direction, 1. Management Policy, first paragraph. Insert after "maintaining" the words "or enhancing".
- Page 12 Management Direction, 1. Management Policy, second paragraph. It appears the second sentence beginning with "Water quality data" is more of a Management Action than a policy statement. Also in this paragraph, change "Arizona Water Quality Control Council's" to the "State of Arizona's Unique Waters Protection Program". The Council no longer exists and the program is now directly administered by the Department of Health Services.
- Page 12 "The source of water quality parameters that exceed"  
2nd Col. Don't they really want to say - "Suspected sources  
Para. 2 which degrade water quality in excess of est. standards  
will be investigated and control measures...."
- Page 13 Management Actions, third paragraph. Insert the word "existing" between "to" and "state". Otherwise, this statement is redundant with the next statement about the "Unique Waters". Also add the following statement.

## 2. MANAGEMENT ACTIONS

Water filings will be made, where unappropriated water exists and State law permits, for recreation, wildlife, stock water and wilderness resources.

- Page 14 Third paragraph, beginning with "Human activities, etc . . .". It was not established in the water section that human activities has altered flow patterns or chemistry of water within ACW. This totally contradicts the water section.
- Page 18 Management Assumptions, first paragraph, first sentence. BLM is not reserving instream flows in ACW. We didn't say we were going to invoke reserved rights and this sentence really violates our position. Change the sentence after "and", . . . "through maintained low flows, etc." In the same paragraph, beginning with "Flooding can be expected", delete this, it is already stated under Management Assumptions for the Veg. Section.
- Page 19 Management Direction, 1. Management Policy, second sentence of first paragraph, "Natural revegetation," etc. "in spite of flooding". Flooding is a natural process within the riparian zone. It is inextricably related to the processes that establish the zones. It shouldn't be treated as an outside man-caused force.
- Page 39 Implementation sequence. There is nothing here about continuing the monitoring of stream flows in the canyon - even though it is on-going.

#### Vegetation:

- Page 14 Second paragraph, The discussion implies that grazing left no replacement broadleaf riparian species except for the old, decadent trees. The situation is that riparian species have recovered since livestock use was excluded after 1974. This has caused a definite generation gap between the Sapling and Pole size and the over-mature trees.

This paragraph should be changed to conform with Page 17 at paragraph 3, last sentence.

#### Wildlife

- Page 17  
Para. 6 Should specify old bighorn release enclosure is outside ACW.
- Page 19  
Para. 4 Retrieval of collars from bighorns - ground retrieval apparently agreeable with AGFD. If truly needed, mechanized equipment could be authorized on an emergency basis by the State Director unless this plan specifies District Manager. This plan must spell out the District Manager as the authorized officer to conform to the MOU.
- Page 20,  
Para. 2 Predator control has been allowed both in small "offending animal" cases and in larger general control cases in established WAs. (Paiute-Beaver Dam WA in Arizona; USFS administered WA in UT; others). The Wilderness Management Policy (P. 19, Item 7) clearly allows for at least limited predator control. Modify the language throughout the WMP to allow for at least the "offending animal" type of control with the usual limitations.

Page 20 Management Actions. Add new action that covers the collection  
 Para. 4 of fish habitat data to confirm the adequacy of the instream flow  
 requested for Aravaipa Creek.

Cultural Resources:

Good job. The plan permits the scientific use of the resource and provides a number of opportunities for protection and enhancement. The oral history project, brochure revisions, and site interpretations are particularly nice components. The references to evaluating sites according to the "Cultural Resource Use Allocation System" (pp. 22, 23, 42) are slightly inaccurate, however. Sites are evaluated according to the Bureau's cultural resource use evaluation system, and on this basis are allocated to uses in Cultural Resource Management Plans. The text should read, "All sites will be evaluated according to the Bureau's cultural resource use evaluation system and allocated to appropriate uses".

Range Management:

Page 34 Non use license, paragraph one. The current terminology is permit, lease or authorization. You should use proper and current terminology for use authorizations.

Page 34 1. Management Direction, last paragraph, Motorized vehicle use. How will BLM be affected in managing the range? BLM will not be allowed to drive to its three Monitoring Study Sites within the wilderness unless a vehicle is the minimum necessary tool to accomplish the mission. You should add enough substance to the topic paragraph which will clarify BLM's permitted and non-permitted use.

Environmental Assessment:

General Comments:

The EA for the Aravaipa Canyon Management Plan is very brief and general. It does not show the reader that the Safford District has looked very carefully at the consequences of implementing the different alternatives.

For example, the reader should be able to understand that, in the establishment of LAC standards in the proposed action, some tradeoffs will be made as these standards are defined and applied for vegetation, water quality, cultural resource management, etc. To briefly mention the consideration of the consequences of establishing LAC standards in only one paragraph (p. 49) is not a good example of a "hard look" at the environmental consequences.

The EA should be "beefed up" to demonstrate that the environmental consequences of the proposed action are not significant and that the proposed action is preferable to the other alternatives. This is not a suggestion that words be added simply for bulk, but to show

that consideration has been given to the environmental consequences of the action.

The EA should contain a table that shows the impacts by resource of implementing each of the four alternatives. This may help the reader sense that the environmental consequences have been considered.

Specific Comments:

- Page 47 The INTRODUCTION section and the Purpose and Need paragraph are mixed up. The paragraph in the Purpose and Need section should replace the introduction paragraph, and the introduction paragraph should be the Purpose and Need section.
- Page 47 Proposed Action: Change the fourth sentence to show that the establishment of LAC standards will affect more than just the recreation resource.
- Page 48 No Action: The third sentence is repetitive and is not necessary.
- Page 49 Para.2 The discussion of the "information and education plan" portion of the proposed action needs clarification. For example, it is unlikely that there would be any significant quantifiable or measurable direct environmental impacts from implementing the development of an educational plan component (p. 31) of the proposed action alternative.
- After the "information and education plan" is developed, there possibly may be some beneficial consequences resulting from implementing it, but these would be "indirect" results at best and (unless carefully monitored) would be largely unmeasurable.
- Page 49 Para. 3 Stress that a resource-specific analysis of the implementation of the proposed action supports the conclusion that there would be no significant adverse consequences from implementing the proposed action.
- Page 49 No Action Alternative: Implementation of the No Action Alternative will not cause rapidly increasing visitor use or diminish the quality of the wilderness recreation experience. This should be rewritten to indicate that the No Action Alternative does not provide management prescriptions that would prevent damage from increased visitor use, therefore . . .
- Page 50 Mitigation: This section is unnecessary. The sentence should be part of the description of the Proposed Alternative on page 47.

We look forward to review of the draft Final ACW Management Plan by the MBO date of April 21, 1987. Please let (931) know immediately if assistance on Cartographic work will be needed from (941) as wilderness program priorities will need to be revised.

*Robert C. Archibald, Jr.*

Attachment

1 - Marked-up AC WMP

BUREAU OF LAND MANAGEMENT  
425 E. 4th STREET  
SAFFORD, AZ 85546

8561  
(043)

FTS 762-6384

AUG 18 1986

*K. Mahoney*

Memorandum

To: State Director, Arizona 930  
From: District Manager, Safford  
Subject: Draft Aravaipa Canyon Wilderness Management Plan

Enclosed, for review, is the draft Aravaipa Canyon Wilderness Management Plan. Please retain three copies in the Division of Lands and Renewable Resources and forward two copies to the Washington Office for their review. We would appreciate comments from Jim Currihan and other appropriate specialists. Would you, also, make one copy available to Jane Closson for her review?

Our schedule provides for a two week review period, so comments should be returned by August 29, 1986. In order to give the WO the two weeks they require, I recommend you forward the document by overnight mail service.

We look forward to your assistance in finalizing this document. If you have any questions, contact Ken Mahoney, Gila Resource Area Outdoor Recreation Planner.

Lester K. Rosamir

Enclosures  
SKNOX/sa/8/18/86



BUREAU OF LAND MANAGEMENT  
425 E. 4th STREET  
SAFFORD, AZ 85548

8561  
(043)

FTS 762-6384

JUL 18 1986

*Shirley  
K. Maloney  
K. Cook*

Memorandum

To: State Director, Arizona (931)  
From: District Manager, Safford  
Subject: Aravaipa Canyon Wilderness Management Plan

It has become necessary to adjust our schedule for completion of the Aravaipa Canyon Wilderness Management Plan (WMP). Due to unexpected workload items and overly optimistic scheduling, we will not be able to complete the final WMP by the end of the fiscal year.

With the retirement of our east-end Ranger, elimination of the Park Technician classification series, and acquisition of approximately 50,000 acres of State land around the wilderness, it became necessary to rewrite the position descriptions for the wilderness Rangers. We also have to advertise for and select a temporary replacement at the east-end Ranger and ultimately a permanent replacement. These jobs take time away from completion of the WMP because the principal author of the WMP also is deeply involved in personnel matters of the Rangers. In addition to the unexpected workload, we were also overly optimistic in our planned schedule for completion of the plan. Preparation of a quality plan is just taking a little more time than we anticipated. The schedule in the MBO book also did not leave adequate time for public review of the draft WMP and preparation of the final plan.

For these reasons I would like to adjust our entire schedule about two months to a completion date of December 8, 1986. Specifically the adjusted schedule would be:

Complete draft WMP	8-1-86
Complete ASO and WO review of draft WMP	8-15-86
Reproduce and distribute draft WMP for public review	8-29-86
Complete 45-day public review period	10-15-86
Complete final WMP	11-14-86
Print final WMP	12-5-86
Distribute final WMP	12-8-86

Upon your concurrence to adjust the schedule, we will amend the MBO book and units of accomplishment in the AWP. If you have any questions, contact LeRoy Cook, Gila Resource Area Manager.

SKNOX/sa/7/17/86

Lester R. Kosloski



# United States Department of the Interior

IN REPLY REFER TO:

8561  
(044)

## BUREAU OF LAND MANAGEMENT SAFFORD DISTRICT OFFICE

425 E. 4th Street  
Safford, Arizona 85546

(602) 428-4040

**MAY 29 1986**

### Memorandum

To: Gila Area Manager

From: Outdoor Recreation Planner

Subject: Aravaipa Canyon Wilderness Management Plan Progress Report

Since March 20, 1986, date of the last progress report, the Preplan Analysis has been finalized and signed by the District Manager. With that, a planning team has been formed to assist in the preparation of the Wilderness Management Plan (WMP). Members of the planning team and the subjects they will cover, as listed in the Preplan Analysis, are as follows:

Al Alvarez	Fire, Search and Rescue
Cindy Alvarez	Water Resources
Al Bammann	Vegetation, Insects, Noxious Plants
Bob Parker	Fish and Wildlife
Penny Rucks	Cultural Resources
Paul Tankersley	Range

Topics that I am covering in the plan include recreation use (visitor and commercial use, recreational livestock, camp areas, trails, trailheads, signs and access), administration, information and education and scientific study. Other subjects that I am addressing with consultation assistance of other staff members are aircraft overflights (Al Alvarez), lands and realty (Randy Massey), minerals (Ron Loomis) and soils (Larry Humphrey).

Organizational meetings with team members were held during the week of April 21. Materials to help in the preparation of assigned sections were distributed. Team members have been working on these sections and some have submitted drafts. Others will have their drafts completed within a few days.

Along with working on my sections, I will be reviewing team members input for consistency with wilderness management policy. At some time within the coming month, I will also be needing your assistance to review a draft of the plan for overall management consistency.

The preliminary draft is scheduled to be completed July 1, 1986. Review of drafted portions of the plan prior to that date will be an important step in assuring that the plan is consistent throughout and follows through in a logical manner.

*Ken Mahoney*

USAV-00005472

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ROUTING AND TRANSMITTAL SLIP

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- 1. Necessary action
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- 3. Signature
- 4. Prepare reply
- 5. Your comment and return
- 6. Note and surname
- 7. Note and return
- 8. Your information
- 9. See me
- 10.

From	Date	Room No.
leky		
Office	Phone	

Remarks

We expect to have a  
Draft Wilderness Mgt  
Plan By July 1, 1986  
(on target)

BUREAU OF LAND MANAGEMENT  
425 E. 4th STREET  
SAFFORD, AZ 85546

(602) 428-4040

*K. Mahoney*

MAY 29 1986

Memorandum

To: Gila Area Manager  
From: Outdoor Recreation Planner  
Subject: Aravaipa Canyon Wilderness Management Plan Progress Report

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The preliminary draft is scheduled to be completed July 1, 1986. Review of drafted portions of the plan prior to that date will be an important step in assuring that the plan is consistent throughout and follows through in a logical manner.

KMAHONEY/10/5/28/86



# United States Department of the Interior

IN REPLY REFER TO:

8561  
(044)

BUREAU OF LAND MANAGEMENT  
SAFFORD DISTRICT OFFICE  
425 E. 4th Street  
Safford, Arizona 85546  
FTS 762-6384

MAR 20 1986

## Memorandum

To: Gila Area Manager

From: Outdoor Recreation Planner

Subject: Aravaipa Canyon Wilderness Management Plan Progress Report

Several steps have been completed to date toward the preparation of the Wilderness Management Plan (WMP). Preliminary issues as well as goals and potential objectives relating to management of Aravaipa Canyon Wilderness (ACW) were prepared in July 1985. The Safford District Advisory Council was given the opportunity to comment and raise additional objectives and issues during their regular meeting.

A news release and a letter to the public were prepared in November announcing meetings to address ACW management. About 130 letters were mailed out to various interest groups and individuals. Public meetings were held in Safford, Phoenix, Dudleyville and Tucson during early December. Forty participants identified many issues of concern to them, covering the subjects of wildlife, visitor use and recreation, water resources, livestock, fire, aircraft, cultural resources, vegetation and administration. These issues have been summarized and a copy is attached.

Additionally, other issues were received in five letters and two telephone conversations in December and early January. A summary of the issues contained in this correspondence is also attached.

The summaries of the issues are being reviewed to consolidate similar concerns and identify critical topics to be addressed in the WMP. Other specialists in the resource area should also be involved in this review. A final list of issues and management objectives will be developed from this process and will provide the basis for preparing the WMP.

A Preplan Analysis has been drafted and should be reviewed by you and the District Manager. The Preplan Analysis contains, among other things, a schedule

USAV-00005475

for completion of the WMP and identifies principal staff to participate in preparing the WMP. Once the Preplan Analysis is finalized, it should be distributed to the participating staff along with other information that will assist the staff in making the resource input necessary to prepare the WMP. A WMP planning team meeting will be scheduled to discuss and clarify any questions about the Wilderness Management Policy, the planning process and what is needed.

Writing of the initial portions of the WMP will begin later this month. Important MBO dates concerning the WMP include completion of a preliminary draft by July 1, 1986, and completion of the final WMP by September 30, 1986. I feel that these items can be met as scheduled. The next progress report will be made near the end of April.

Ken Mahoney

8561  
(044)

BUREAU OF LAND MANAGEMENT  
425 E. 4th STREET,  
SAFFORD, AZ 85546

PTS 762-6384

*Ken Mahoney*

MAR 20 1986

Memorandum

To: Gila Area Manager

From: Outdoor Recreation Planner

Subject: Aravaipa Canyon Wilderness Management Plan Progress Report

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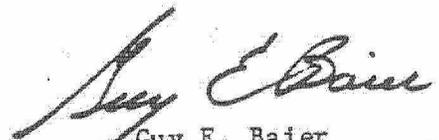
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KMAHONEY/ed:03/11/86:0033C



Arizona/Utah	Paria Canyon-Vermilion Cliffs Beaver Dam Mountains
California	Trinity Alps Yolla Bolly-Middle Eel
New Mexico	Bisti De-na-zin
Oregon	Hells Canyon Oregon Islands Table Rock
Washington	Juniper Dunes

Please call Keith Corrigall or Dave Porter at FTS343-6064 if there are questions or concerns.



Guy E. Baier  
Deputy Director for Lands and Renewable Resources  
Acting

8560  
6500  
(043)

DEPARTMENT OF LAND MANAGEMENT  
425 E. 4th STREET  
SAFFORD, AZ 85546

(FIS 762-6384)

*Shirley  
Gunn  
K. Maloney  
H. Cook*

Memorandum

Date: October 19, 1984  
To: State Director (931)  
From: District Manager, Safford  
Subject: Request for Assistance in Preparation of  
the Aravaipa Canyon Wilderness Management Plan

We will begin preparation of the Aravaipa Canyon Wilderness Management Plan this fiscal year. While our primitive area management plan has been in operation for many years, with wilderness designation we now have the responsibility to update the existing plan to wilderness standards. Many issues involved with wilderness management will be addressed in the plan - visitor use (carrying capacity study), livestock grazing, wildlife management (especially T&E species), wildfire, water resources, and support facilities.

Because Aravaipa Canyon is one of the first BLM wilderness areas, the management plan may serve as a prototype for subsequent plans. For this reason and because of the complexity of issues involved in management of the wilderness area, I request Bob Abbey from your staff and Dave Porter from the Washington Office staff come to Safford to assist us in preparation of the management plan.

I anticipate we will spend two to three days in the canyon and one day in the office. The week of November 12 might be a good time because Bob and Dave Porter could attend the Aravaipa Canyon Wilderness dedication ceremony on November 13 and finish the week discussing the wilderness management plan.

Let me know if these dates are acceptable and give me a call if you have any questions.

Lester K. Brockman

SKnox/car/10/19/84