



COMMUNITY WATERSHED ALLIANCE

June 10, 2015

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Re: Change of ACEC designation to "Priority Habitat" – Comment Period closing June 10th.

After attending the May 19th Alternatives Development presentation and the June 8th meeting with Ms. Markstein, Mr. Milnor, and yourself, we find we are still in need of substantive information.

In the 9-mile stretch of the SPRNCA within the Benson subwatershed, we have two Areas of Critical Environmental Concern with the additional designation of Research Natural Areas: the St. David Cienega and the San Pedro River (Summers).

Both ACEC and RNA terms are clearly defined in the 1989 Final Environmental Impact Statement Glossary and ACECs are Congressionally recognized in the Federal Land Policy and Management Act (FLPMA) (43USC 1702(a), 43 CFR 1601.0-5 (a) and the BLM 1613 Manual.

We have found no definition and only limited application of "Priority Habitat" (Sage-Grouse) as we ardently searched for written material - no BLM Manuals or Handbooks were identified, and no references to any RMPs within the Southwest were mentioned. We have contacted field specialists who are very knowledgeable regarding BLM management strategies to no avail.....the term/application/implementation, as used by BLM, remain primarily an unknown.

We understand and can appreciate that BLM is looking to create a more dynamic and efficient planning process with fewer layers that is responsive to change while, at the same time, enhancing opportunities for collaborative planning. The Planning 2.0 initiative is still underway and more review and collaboration is necessary before revisions are made to the BLM's Land Use Planning Regulations (43 CFR 1601 and 1610) and the Land Use Planning Handbook (H-1601-1).

As posted on the BLM website, Public Summary Reports related to "Improving the Way we Plan Together" indicate a desire to not eliminate ACECs, but to support a "priority" preference for maintaining those that exist, transparent management of important values, and base-line management prescriptions for each "type" of ACEC.

Areas of Critical Environmental Concern (ACEC)

- Define ACEC "priority" to indicate a preference for maintaining existing ACECs and designating new ACECs to manage relevant and important values. ACEC designation should occur where those values can be protected through designation of an ACEC.
- Broaden ACECs to include:
 - o Research Natural Areas
 - o Outstanding Natural Areas
 - o Important Bird Areas

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- o Scenic Corridors.
- Identify categories of ACECs. For example:
 - o Community Watershed ACEC
 - o Community Airshed ACEC
 - o Wildlife Core Area ACEC
 - o Wildlife Linkage ACEC
 - o Restoration ACEC
- Name ACECs in a manner that relates to the relevant and important values.
- Establish specific baseline management prescriptions for each “type” of ACEC (e.g. habitat ACEC, cultural ACEC, scenic ACEC).

Comments also indicate that the process for declassification of ACECs should be significant – at minimum, the criteria from Manual 1631 for “dropping an area for further consideration for ACEC Designation” should be applicable – “When an area is found not to meet the relevance and importance criteria, the analysis supporting that conclusion must be incorporated into the plan and associated environmental document.”

PEW Trust has similarly captured significant public sentiment:

Standards for Removing Protections: BLM should require that decisions to remove existing conservation prescriptions undergo analysis similar to that required for the designation or allocation of such areas, and the justification for any proposed declassification should be made public as part of the planning process.

In conclusion:

It appears that “Priority Habitat” is a relatively “unknown” benchmark in BLM Management Planning. This in itself does not give the public confidence that land managers will be tasked with identifying the significant qualities that give SPRNCA ACECs “their unique special worth, distinctiveness, or identifying qualities and circumstances which make the areas fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change”.

It appears that the term “Priority Habitat” will allow generalizations to occur across critical areas versus the site specific management strategies needed as ACECs are currently identified and defined.

It is time that BLM seizes this RMP opportunity to raise the bar of accountability by not using a relatively unknown standard/strategy but by developing performance standards that protect the relevant and important values of each of the three ACECs in the SPRNCA as found in current BLM Governance/Guidance Manuals.

Sincerely,

//signed//

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