



Hereford Natural Resource Conservation District

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September 20, 2018

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Submitted Electronically to: <https://go.usa.gov/xnTuM>

RE: Comments on the June 2018 San Pedro Riparian National Conservation Area Draft Resource Management Plan and Environmental Impact Statement

Mr. Feldhauser and Ms. Markstein,

Thank you for the opportunity to comment on the draft Resource Management Plan / Environmental Impact Statement prepared by the Bureau of Land Management (BLM) for the San Pedro National Riparian Conservation Area (SPRNCA) and to add this relevant information. All previous comments submitted by the Hereford Natural Resource Conservation District (herein referred to HNRCD) on this planning process are herein incorporated by reference. As coordinating agency, HNRCD submitted the information cited below to BLM over the past four years.

The HNRCD is organized under Chapter 6, Arizona Revised Statutes Title 37, Public Lands. Locally elected and appointed officials govern the HNRCD and evaluate the conservation needs of their respective areas.

The HNRCD activities include but are not limited to the restoration and conservation of lands and soil resources of the District and state, the preservation of water rights and the control and prevention of soil erosion. Performance of their duties related to these activities assists in conserving natural

resources and wildlife, protecting the tax base, protecting public lands, assisting private property owners to make viable and responsible use of their private lands, and protecting and restoring this state's rivers and streams and associated riparian habitats, and protecting and restoring the fish and wildlife resources that are dependent on those habitats. Performance of their duties protects and promotes the public health, safety and general welfare of the people of the District and the state; the Board of the HNRCD has the obligation and responsibility to represent the interest of the people and the interest of the District as a whole in economic stability, a sound environment and the general health, safety and welfare of the citizens of the District.

Summary

Please register our support of Alternative C, the preferred alternative. We understand the focus of this alternative is to balance resource protection and public use by authorizing livestock grazing in areas compatible with the conservation values and provide a diverse mix of recreational opportunities, while utilizing active resource management to minimize impacts and for ecosystem restoration.

We support this alternative because it best meets the original intent of the legislation that created SPRNCA. That legislation did not ban livestock grazing and it did not create a wilderness area.

The legislation specifically calls for protecting cultural resources.

The economic impact caused by the temporary reduction of livestock grazing since 1988, which impacts our ranching culture –has disproportionately fallen on members of the Hereford Natural Resource Conservation District, (HNRCD).

The results of our discussion with our members show:

- (1) Livestock grazing on SPRNCA is essential to the ranching industry in Cochise County;
- (2) Ranching is a highly valued culture in the County. It is the base of many community activities and traditions. It also provides social and cultural stability to communities in the County;
- (3) Ranching is an important part of diversifying the economy of the County;
- (4) Tourism cannot replace livestock grazing in the SRPNCA without substantial investments by BLM, local governments, and the private sector into new tourist support infrastructures and services; and
- (5) SPRNCA is a multiuse National Conservation Area with many defined missions in the proclamation identified in PL 100-696 including, scientific, cultural, recreation and education resource values. Livestock grazing, education and science research can include rangeland restoration and range management research at an allotment scale.

Recommendation:

HNRCDC proposes BLM either adopt Alternative C as written or further refine the discussion of livestock grazing in the SRPNCA RMP/EIS to include the following alternative refinements:

- (1) Provide for the activation of all suspended AUMS in the SPRNCA;
- (2) Provide for flexibility in managing timing and placement of cattle within allotments;
- (3) Provide for restoration of rangelands to promote rangeland health and sustainability;
- (4) Provide for large scale science research on range land restoration;
- (5) Provide for allotment-scale science research with integrated range management;
- (6) Provide for reseeding using appropriate grasses, forbs, and shrub species;
- (7) Provide for watershed development by removal of invading woody species that create risky biological monocultures;
- (8) Provide for development, improvement and maintenance of water facilities;
- (9) Provide for fuel reductions to reduce fire danger through livestock grazing; and
- (10) Provide for the multiple-use aspects of the NCA proclamation i.e. it is not to be managed as a national wilderness.

Discussion

The current BLM management plan (BLM 1989) states: *“The primary purpose for obtaining the lands in the EIS area was to protect and enhance the riparian ecosystem along the upper San Pedro River. While BLM does not regard livestock grazing to be incompatible with the continued existence of the riparian ecosystem, a decision was made to prohibit livestock grazing for the 15-year life of this plan. At the end of that time livestock grazing in the EIS area will be re-evaluated.”* In support of their position on livestock grazing in the SPRNCA, the Hereford NRCD wishes to assist BLM in making that re-evaluation.

Livestock grazing has a long history in the San Pedro River Valley. The first cattle and sheep were introduced about 1690 by Padre Kino (Smith, L. 2014. *Grazing in the San Pedro Riparian National Conservation Area An Analysis Prepared for the Hereford Natural Resource Conservation District.* Cascabel Ranch and Consulting, Carta Valley, Texas) and continues to date, though only on four allotments.

The total contribution of the beef industry to the Cochise County economy is \$59.1 million in output, \$10.3 million in value added, \$7.7 million in labor income, and 289 total jobs (Kerna et al 2014, *The Contribution of the Beef Industry to Arizona’s Economy: State and County Profiles*).

Cochise County				
Impact Type	Direct Effect	Indirect Effect	Induced Effect	Total Effect
Output	\$52,406,567	\$4,454,071	\$2,199,908	\$59,060,546
Value Added	\$6,294,084	\$2,638,696	\$1,345,559	\$10,278,339
Employment	234	35	20	289
Labor Income	\$6,249,910	\$830,670	\$584,996	\$7,665,577

Source: IMPLAN Group, LLC, 2011

HNRCD members are dependent upon public land to balance their allotment use. Members of the HNRCD that are former permit holders within the lands now designated as SPRNCA say there is no cost-effective way to replace the AUMS that have been suspended since 1988. They cannot reduce the size of their operation to their private property and survive. They would be out of ranching if they could not use public lands to supplement their private lands. Members of the HNRCD cannot move to another location to continue ranching due to the economic impact.

Most ranchers along SPRNCA would need to sell the private holdings to developers if they stopped grazing. They would need to find off-ranch work if they were not already working off-ranch. Many of them said they would retire in place of finding off-ranch work.

Ranchers in Cochise County provide for recreational uses including allowing hiking, bird watching and hunting within their allotment(s). The typical problems with recreational use include gates left open, trash, and damaged property. Many are not having any serious trouble with recreational users. A number of members of the HNRCD said that recreational users enjoyed watching them “work the cattle” and that recreationists from around the world support their customs, culture and livelihood.

HNRCD ranchers know that there are a number of projects that are needed when SPRNCA is opened to additional grazing. Reseeding, fencing, water improvements, thinning woody plants and flexibility in livestock grazing plans are all needed. With these improvements, the AUMs SPRNCA is capable of supporting is higher than estimated in the Draft RMP/EIS.

Ranching culture within the SPRNCA is long and extensive. Many families have ranched there for 100 years or more. Five and six generations have ranched in the same areas, long before there was a BLM or NCA. Ranching is a significant part of the culture of the Upper San Pedro River.

Ranchers are an important part of the public safety and rescue elements within SPRNCA. They provide directions and assist lost tourist. GPS systems often lead tourists to places and

circumstances they cannot get out of on their own. Ranchers report and monitor activities within SPRNCA that would otherwise go unreported and the therefore unknown to SPRNCA personnel for long periods.

Historically, ranchers maintained fences that keep unpermitted animals, including diseased livestock from Mexico, from entering SPRNCA. The value of the fence maintenance and day to day presence along the San Pedro River contributed to National security as well as animal health.

Some tourists and others oppose livestock grazing. Other tourists and individuals support livestock grazing. Many tourists from foreign countries state that seeing cowboys and cattle on the open range in the American West is the highlight of their trip to America. Ranchers report that when tourists see them "working cattle" they take many pictures to record their experience.

Conclusions and Recommendations

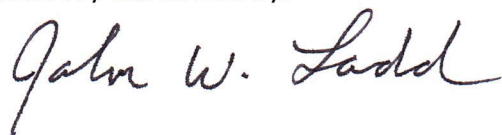
Please continue to carry forward Alternative C as written or further refine the action alternatives in the SPRNCA RMP/EIS to add the information within this comment letter. As discussed above, this information has been provided to BLM in a variety of documents in the past during the NEPA process. We request BLM use more of this information going forward.

Though some members of the public suggest replacing livestock grazing on the SPRNCA with tourism revenues, that would require substantial investment by the BLM, local governments, and the private sector. The type of tourism would need to be changed to include a significant increase in destination tourism to use the resources and values of SRPNCA to sustain the economy of Cochise County. Tourist visitations in the County are dependent upon fuel cost, income levels, and exchange rate. Therefore, tourist visitations are variable.

As a coordinating agency, HNRCD Board Members request a meeting with you during the next three months to discuss the content of this letter and how we can work together to assure the ranching culture and economic stability are fully considered in the NEPA process.

Thank you.

Respectfully submitted by:

A handwritten signature in black ink that reads "John W. Ladd". The signature is written in a cursive, flowing style.

John W. Ladd
Chairman, Hereford NRCD