

Bruce Olson, Fuels Technician  
BLM Phoenix Field Office  
21605 North 7<sup>th</sup> Avenue  
Phoenix, AZ 85027-2929

Dear Mr. Olson;

Thank you for the opportunity to comment on the proposed project to improve the semi-desert grasslands health on the Agua Fria National Monument. The Sonoran Audubon Society supports the proposed action to use mechanical methods and prescription fires to treat up to 50,000 acres.

We are concerned about how “biological techniques” will be implemented and oppose the use of livestock for this purpose if the result is heavy grazing on “treatment” sites. We do not see how grazing of livestock can be used to contain fires to specific pastures without removing vegetation beyond acceptable standards and adversely impacting pronghorn antelope fawning and ground nesting bird cover.

We recommend that a more detailed plan be developed to assure that sufficient acres remain at needed standards of ground cover for wildlife to determine the total treatment acres authorized in a given year (including adjacent acres impacted by vegetative removal for fire perimeter management).

Sincerely,

Chuck Kangas