

Bureau of Land Management
Att: Chris Horyza, RMP Project Manager
21605 N. 7th Ave.
Phoenix, AZ 85027
Dear Chris;

April 5, 2006

The Sonoran Audubon Society (SAS) appreciates the opportunity to review the draft Management Plan for the Agua Fria National Monument. SAS favors Alternative E with modifications. For our present and Desired Future Condition, SAS offers our Volunteer Agreement with the BLM:

- conduct bird monitoring;
- develop an avian conservation plan;
- do public education and outreach about bird populations and habitats;
- monitor bird population responses to habitat projects such as prescribed fires and riparian habitat recovery
- develop brochures and information about Agua Fria National Monument's IBA
- write an avian conservation plan for the IBA.

From Alternative D, SAS would prefer to have the Agua Fria Riparian Corridor designated an ACEC. We understand that details of an ACEC are added and implemented after the designation occurs, and the Monument Proclamation incorporates scoping results developed when the Monument and the Bradshaw-Harquahalas were Planning Areas. We want to provide plenty of details to be implemented into this proposed ACEC, as follow:

The extensive riparian woodland along the Agua Fria River and its tributaries provides both breeding and wintering habitat for a number of bird species and constitutes a recently discovered migration route paralleling the one along the Verde River. 177 bird species were found using the Agua Fria National Monument . Many of the upland species are found in pockets of riparian-type habitat within the larger semi-desert grassland. To date there are 111 confirmed, probable, or possible nesting species. Nesting and migrating raptors are abundant, Cooper's Hawk, Red-tailed Hawk, Great Horned Owl (7 pairs), Zone-tailed Hawk (4 pairs), and with at least one pair of Golden Eagle, Common Black-Hawk, and Peregrine Falcon. On two bird censuses, a Gila Monster was encountered 1 mile downstream from the Bloody Basin road, climbing the stream bank to the concrete structure under the power lines. Another survey encountered a tortoise crossing near the Bloody Basin road at Silver Creek.

Rather than restricting grazing to November to June in the riparian zone to accomplish recovery, SAS suggests monitoring be used to assess the health of the riparian zones as described in Cowley and Burton; Monitoring Stream banks and Riparian Vegetation – Multiple Indicators, BLM Technical Bulletin No.2005-2. Data from this monitoring would be used to adjust grazing management, including removal of livestock if necessary.

Sonoran Audubon's seasonal volunteer bird counts in this riparian area have resulted in its declaration as an Important Bird Area (IBA). An SAS research project with the Arizona Game and Fish Department Yellow-billed Cuckoo surveys located several nesting birds. Section 3.5.5.4, page 399, Volume 1, discusses the importance of this finding.

The herd of pronghorn in the Monument is separated from other populations as a result of fragmented habitat due to Interstate 17. The management of the grasslands on the mesas for the benefit of this population is imperative. SAS is the steward for this grassland IBA. The designation of a pronghorn antelope management area on Perry Mesa would be useful to the IBA expansion plans into the grasslands. The desire is to establish an area search for upland bird populations in the grasslands proximate to Joe's Hill. That coincides with identified antelope fawning areas. The proposed Pronghorn Antelope Fawning Habitat (WHA) would be the area of focus for SAS grasslands birds. The proposed seasonal access limitations could impede accomplishment of that objective without more extensive coordination with the BLM for scheduled visits. Also a concern that Special Recreation Uses are all that will be allowed during the spring-summer raises the question about access for Sonoran Audubon to do the volunteer work, ref. page 506, Alternatives C, D and E, "Limiting vehicle routes in pronghorn corridors might restrict access to cultural resources, which would protect sites from human intrusions, but would limit opportunities for scientific research, site monitoring, and interpretive development". This problem is common to many volunteer groups and in wilderness areas.

A common theme through this land use plan, and all land use plans involving cattle, is to control (fence) or otherwise restrict cattle around riparian areas, streams, wetlands, etc. This, of course, requires stock tanks away from these areas. Not all stock tanks are undesirable even though they attract cow birds and invasive plant species as a result of disturbed soil. On Perry Mesa and other upland mesas we have found water pipits, sandpipers, ducks other grass land birds using stock tanks. Some stock tanks have high retention walls to create the basins. Pronghorns, requiring safety sight distances, avoid tanks with that structure. One tank with a windmill south of Bloody Basin road has good sight distances and has horned larks, savanna sparrows, and other grassland birds using the water. The pumping was inactive but the mill was rotating; e.g., presumably dry well.

Under Alternative E, grazing would continue in the uplands. Considering the current drought conditions, it is reasonable to presume that holders of grazing allotments will want to add tanks and deepen wells that supply them or supply the 10,000 gallon tanks. A search of the ADEQ and ADWR groundwater data bases failed to locate wells with a 5 miles radius of T 91/2, R 3E, S 29, the afore mentioned Joes Hill Quadrangle. There has been a referral to depth to water in wells at ranches in the Agua Fria River Corridor but no data for the upland wells. Water retention is mentioned through out the AGNM/Bradshaw Management Plan. Accomplishment of that seems to be transportation route planning and livestock management on various classes of soils. Juggling these considerations using *Arizona Standards for Rangeland Health and Guidelines for Grazing Administration*, Standard One: Upland Sites with regard to the

Alternatives, Volume 1, page 209; Alternatives A and E would allow for mechanized water development.

These comments are being sent under the name of Bob McCormick, president of the Sonoran Audubon Society as required in the by-laws; there are multiple authors.