United States Department of the Interior
U.S. Fish and Wildlife Service
Arizona Ecological Services Field Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer to:
AESO/SE

October 18, 2007

Memorandum

To: Superintendent, National Park Service, Tucson, Arizona (Attn: Sarah Craighead)

From: Field Supervisor

Subject: Comments Regarding Saguaro National Park Draft General Management Plan in Tucson, Arizona

Thank you for the opportunity to review your draft General Management Plan/ Environmental Impact Statement (DEIS) for Saguaro National Park, East and West, located in Pima County, Arizona. We believe that the preferred alternative appears to most fully implement the Park Service's mission and additionally aid that of the Fish and Wildlife Service, particularly in regard to protection and efforts on behalf of listed species and the habitats upon which they depend. We recommend that as future, site-specific proposals for the Park enter the early planning stages, our staffs communicate and evaluate proposed projects for effects to listed species and their habitats. Our excellent working relationship will make the process of Section 7 consultation proceed smoothly and efficiently.

We appreciate your work and efforts on behalf of listed species and their habitats. If you have any questions, please contact Thetis Gamberg at (520) 670-6150 (x231) or Jim Rorabaugh of our Tucson suboffice at (520) 670-6150 (x230).

for Steven L. Spangle

cc: Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ
Assistant Field Supervisor, Fish and Wildlife Service, Flagstaff, AZ (Attn: Shaula Hedwall)
Regional Supervisor, Arizona Game and Fish Department, Tucson, AZ (Attn: Tim Snow)
Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ

W:\Thetis Gamberg\SNP GMP.DEIS comments.doc:cgg

AK-CHIN INDIAN COMMUNITY
Cultural Resources Office
42507 W Peters & Nall Road • Maricopa, Arizona 85239 • Telephone: (520) 568-1369 • Fax: (520) 568-1366

September 20, 2007

Sarah Craighead, Superintendent
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730

Dear Superintendent Craighead:

The Ak-Chin Cultural Resources Office did recently receive a copy of the Draft General Management Plan / Environmental Impact Statement for the Saguaro National Park.

Thank you for inviting our comments on this plan and the three alternatives that are being proposed. At this time, our office will defer comments to the Tohono O'odham Nation.

If you have any questions, please contact me at (520) 568-1369. I can also be reached at Ggilbert@ak-chin.nsn.us.

Sincerely,

Gary Gilbert
Cultural Resources Technician II
Cultural Resources Office
Ak-Chin Indian Community

PHIL LOPES
LEGISLATIVE DISTRICT 27

1700 WEST WASHINGTON, SUITE H
PHOENIX, ARIZONA 85007-2844
CAPITOL PHONE: (602) 926-3278
CAPITOL FAX: (602) 417-3127
TOLL FREE: 1-800-352-8404

TUCSON LEGISLATIVE OFFICE
400 WEST CONGRESS, SUITE 201
TUCSON, ARIZONA 85701
TUCSON PHONE: (520) 398-6000
TUCSON FAX: (520) 398-6028

plopes@azleg.gov

Arizona House of Representatives
Phoenix, Arizona 85007

LEADER, HOUSE DEMOCRATS

APPROPRIATIONS, RANKING MEMBER

HEALTH

JOINT COMMITTEE ON CAPITAL REVIEW

October 2, 2007

Sarah Craighead
Superintendent, Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85775-3009
Sent via email, hardcopy to follow

**Re: Saguaro Draft General Management Plan/Environmental Impact Statement**

Dear Superintendent Craighead:

Thank you for the opportunity to comment on the ***Saguaro Draft General Management Plan/Environmental Impact Statement.*** A portion of the Saguaro National Park (SNP), the Tucson Mountain District, is in the legislative district I represent. I also enjoy the park and certainly support protecting it for the people of my district, the people of Arizona, and all Americans.

I strongly support Alternative 2, the Preferred Alternative in the draft the General Management Plan, because it provides the greatest protection for the Park's natural resources. Furthermore it is consistent with the mandate given the National Park Service included in the National Park Service Organic Act (16 U.S.C. 1 2 3 and 4), which states that service should ensure that the uses of our parks conform to the purposes:

> *". . . which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

None of the other alternatives meet this purpose. "Alternative 3" would put recreational uses above protection of the park's resources to the detriment of the resources and to future generations. The "No Action" alternative would not give the resources adequate protection or provide for limiting visitor impact on the Park's resources.

Alternative 2 provides an important step in the right direction for the park. Alternative 2 helps ensure that the park is managed to maximize pristine resource conditions which protect natural processes and biological diversity. It redirects visitation in order to protect the more sensitive park resources and ensure that wilderness areas are available for primitive low visitor use. This alternative helps to reduce fragmented habitats and will help limit the invasion of non-native plant and animal species that negatively affect the native plants and animals.

I support the closure and rehabilitation of wildcat, duplicate and parallel trails in both park districts and agree with limiting off-trail travel in the Tucson Mountain District and in the Rincon Mountain District below 4500 feet in altitude in order to protect the Park's fragile soils, plants, and wildlife habitat.

The through-park roads and multiple entrances to the Tucson Mountain District encourage commuters to enter the park and allow excessive speeds and traffic that conflict with park visitors and damage resources and wildlife along the roadways. Slowing and/or re-directing this traffic will help protect park visitors and the park's wildlife and should be a priority in the Park's transportation plan.

Finally, I ask that any changes to the Tucson Mountain District visitor center be minimal and that this center focus on interpretative nature displays, wildlife viewing, and the importance of Saguaro National Park and of "treading lightly" on the land.

Thank you for the opportunity to comment on this important plan.

Sincerely,

PHIL LOPES

C48

SARP0- 2002-2363/33855 CNAE

**United States Department of the Interior**

**NATIONAL PARK SERVICE**
**Saguaro National Park**
**3693 South Old Spanish Trail**
**Tucson AZ 85730**

IN REPLY REFER TO:

August 1, 2007

AUG 03 2007

Mr. James Garrison, State Historic Preservation Officer
Arizona State Parks
1300 West Washington Street
Phoenix, Arizona (AZ) 85007

Dear Mr. Garrison:

Enclosed for your review and comment is a paper copy of the ***Draft General Management Plan / Environmental Impact Statement*** being prepared for Saguaro National Park. Please forward your comments to me within 60 days, so that we may expect to receive them by October 3, 2007. We seek your concurrence on the preferred management alternative within the range of a no-action alternative and one other action alternative.

Alternative 1, the no-action alternative, would continue current management practices. It serves as a basis of comparison for the action alternatives. Alternative 2, the preferred alternative, would emphasize the biological and ecological diversity of the park by reducing fragmentation of wildlife and plant habitats, protecting and preserving wildlife-movement corridors, and creating connections for wildlife movement among isolated habitats and corridors. Basic facilities related to visitor activities for safety and services would continue to be provided with some expansion of visitor opportunities. Alternative 3 would emphasize a wider range of opportunities for visitors that would be compatible with protecting and preserving resources and sustaining wilderness characteristics. Further expansion would provide additional support for opportunities and programs for a visitor population that is growing and increasing in its diversity of interests. Alternatives 2 and 3 call for the Civilian Aeronautical Administration Building at Madrona, eligible for the National Register of Historic Places, to be razed or donated to a willing taker and removed. Both of these alternatives call for more emphasis on the historic preservation of Manning Cabin, listed in the National Register, rather than the current level of fire and trail crew use.

I look forward to your comments within 60 days. Please contact me if you have any questions by telephoning me at **520-733-5101** or e-mailing me at **<sarah_craighead@nps.gov>**. Internet comments may be submitted at **<http://parkplanning.nps.gov/sagu>** and then choose the **general management plan**. Written comments may be sent to:

**Superintendent Sarah Craighead, Saguaro National Park**
**3693 South Old Spanish Trail, Tucson AZ 85730-5601**

Sincerely,

Sarah Craighead

Sarah Craighead
Superintendent

CONCUR
for ARIZONA STATE HISTORIC PRESERVATION OFFICER
ARIZONA STATE PARKS BOARD
9-11-07
(as per Dr. Bill Collins' review)

TAKE PRIDE IN AMERICA
It's Your Land, Lend A Hand

Janet Napolitano
Governor

Mark Winkleman
State Land
Commissioner

Arizona
State Land Department

177 North Church, Suite 1100 Tucson, AZ 85701 www.land.state.az.us

October 11, 2007

Sarah Craighead
Saguaro National Park
3690 South Old Spanish Trail
Tucson, AZ 85730

Re: Draft General Plan Management Plan/ Environmental Impact Statement

Dear Sarah:

Thank you for the opportunity to review the Draft General Plan Management Plan/ Environmental Impact Statement for Saguaro National Park. Staff has completed the review of this document and has no comments.

Should you have any questions in this regard please contact me at 520-209-4250.

Respectfully,

ARIZONA STATE LAND DEPARTMENT
Southern Arizona Real Estate Office

Tim Bolton
Principal Planner

Pima County
Development Services

Carmine DeBonis Jr.
Director

Office: 520.740.6506
fax: 520.740.6878

October 4, 2007

Sarah Craighead
Superintendent,
Saguaro National Park
3693 South Old Spanish Trail
Tucson, Arizona 85730

Re: Saguaro National Park Draft General Management Plan / Environmental Impact Statement

Dear Sarah:

We have reviewed the Saguaro National Park General Management Plan and Environmental Impact Statement. We support the General Management Plan's Preferred Alternative, which emphasizes protection of the park's ecological processes and biological diversity.

The Pima County Sonoran Desert Conservation Plan (SDCP) seeks to direct growth to areas with the least natural, historic and cultural resource values, while preserving the county's highest-value environmental areas in the Sky Island and Sonoran Desert eco-regions. These areas include critical and sensitive habitats that support a broad suite of floral and faunal species, and corridors that facilitate the dispersal of species between habitats to reduce the threat of genetic isolation. As such, the county's large protected parks, forests and preserves are a key component to the SDCP, and the General Management Plan's emphasis on environmental protection in the park is in keeping with the goals of the SDCP.

There are portions of the General Management Plan for which we would like to provide comments.

Saguaro National Park abuts other protected public federal (Coronado National Forest) and county (Tucson Mountain Park) lands, with other public areas nearby (Ironwood Forest National Monument, Colossal Cave Mountain Park, and Cienega Creek Natural Preserve). These public lands are largely surrounded and abutted by private property. Development on private properties adjacent to public lands has long been recognized as having direct and indirect effects on the biological and natural resources of those public lands. Although the plan notes that urbanization and development of private properties surrounding the park is increasing, there is a notable absence of a cooperative management strategy that engages Pima County on development issues, especially issues related to maintaining viable corridors between the park and other public lands. We would welcome the opportunity to create such a cooperative management strategy.

Regarding riparian areas specifically, the SDCP states that sixty to seventy-five percent of all species in Arizona rely on a riparian environment at some point during their life cycle. Riparian areas are the most vulnerable natural systems, and, on the whole, some of the least protected habitats. Studies suggest that Arizona has lost as much as 80% of its riparian areas through actions such as groundwater pumping, land clearing and other anthropogenic changes.

Public Works Building • 201 N. Stone Ave., 1st Floor • Tucson, AZ • 85701-1207 • Phone 520.740.6506 • Fax 520.740.6878
http://www.pimaxpress.com

As one of the few relatively intact riparian systems in the Tucson basin, we recommend the park employ the highest degree of protection available for Rincon Creek and the Madrona area in the park's east district. While pressure from the local populace to facilitate visitor access to these areas is great, increased visitation without safeguards in place to protect these sensitive areas could lead to irreparable damage.

Thank you for the opportunity to provide comments on the park's General Management Plan and Environmental Impact Statement, and look forward to continued coordination with Saguaro National Park in the future. Should you have questions or require additional information, please contact me at (520) 740-6762 or sherry.ruther@dsd.pima.gov.

Sincerely,

/s/

Sherry A. Ruther
Environmental Planning Manager

SR/mh

Pima County
Natural Resources,
Parks and Recreation

3500 West River Road
Tucson, AZ 85741

520.877.6000
520.877.6006 fax

www.pima.gov/nrpr

Rafael Payan
Director

October 1, 2007

Ms. Sarah Craighead, Superintendent
Saguaro National Park
3693 S. Old Spanish Trail
Tucson, Arizona 85730

**Re: Draft GMP Comments**

Dear Sarah,

The Pima County Natural Resources, Parks and Recreation Department appreciates the opportunity to review the draft GMP document for Saguaro National Park. NRPR does not favor a particular alternative because none of the offered alternatives appears to be entirely reflective of the need to balance a high degree of natural and cultural resource conservation with a complementary amount of public recreational access. For instance, Alternative 2 looks to be the best alternative for the West Unit, while many members of the trails community, particularly the equestrian community, would argue that Alternative 3 is the best choice for the East Unit, because fewer traditional-use trails they utilize would be eradicated.

Our preference is that whatever alternative is ultimately selected accommodate the trail priorities that we set forth in our letter to you dated July 28, 2007, a copy of which is attached. These trail needs, the majority of which were previously approved by the park in one form or another but not ultimately created due to a high degree of superintendent and executive staff turnover (which in turn impacted the park's institutional memory), are legitimate needs that should be provided by the park as a part of the implementation of its new GMP.

Thank you for the opportunity to provide comments. Please don't hesitate to contact me if I can provide you with any additional information or assistance.

Sincerely,

Steve Anderson

Steve Anderson, Principal Planner and Manager,
Planning, Acquisition and Innovation Division

c: Rafael Payan, Director, PCNRPR

*Inspiring greater enjoyment of our natural resources, urban parks and recreation programs.*

Attachment to Pima County Natural Resources, Parks and Recreation letter

Pima County
Natural Resources,
Parks and Recreation

3500 West River Road
Tucson, AZ 85741

520.877.6000
520.877.6006 fax

www.pima.gov/nrpr

Rafael Payan
Director

*Inspiring greater enjoyment of our natural resources, urban parks and recreation programs.*

July 28, 2007

Ms. Sarah Craighead, Superintendent
Saguaro National Park
3693 S. Old Spanish Trail
Tucson, Arizona 85730

Ms. Laurie Domler
National Park Service
IMDE-OPE
12795 W. Alameda Parkway
Denver, Colorado 80225

**Re: Agency Comments on Saguaro National Park Trails Plan**

Dear Sarah and Laurie,

Thank you for the opportunity to review and comment on Saguaro National Park's Comprehensive Trails Plan for both units of the park. NRPR staff has carefully reviewed the plan's various alternatives, and has the following thoughts to offer:

**Key Elements: Rincon Mountain District**.
Because neither Alternative A or B includes all of the key elements necessary to meet the needs of the trails community, we recommend a composite approach that includes the following features:

- **Cactus Forest Trail.** The CFT should remain open to shared use consistent with the EA that was produced in 2004-05. We see no need to ban horses from this trail. All users have successfully shared this trail for more than 15 years. The shared-use portion of the Cactus Forest Trail should be extended from its southern terminus to the western boundary of the park.
- **Cactus Forest Trail Southern Section Reroute.** We recommend replacing the southernmost .9 mile segment of the Cactus Forest Trail and the Irvington Gate with a new route that circumvents the wilderness area and creates a new public access point on the western boundary of the park halfway between Escalante and Irvington Roads. This reconfiguration would allow the existing Irvington Gate across the street from the former Webb's Steakhouse to be closed, and the old trail to be obliterated. It would also provide a linkage to the regional trail system via the Old Spanish Trail Bike and Pedestrian Path.
- **Coyote Creek Access**. This access, secured by Pima County in cooperation with Peter Backus, would connect Coyote Creek Wash, a



public trail, with Saguaro National Park and both the Hope Camp Trail and the Arizona Trail. This access is particularly important for equestrian users that live in the Rincon Valley, and would allow a valuable loop to be crated.

- **Hope Camp Trail**. Before the park's 3,500-acre East Expansion Area was acquired by the National Park Service, hikers, equestrians and mountain bikers shared what is now called the Hope Camp Trail. The final trails plan should include the Hope Camp Trail as a shared-use corridor, given that it is an old road bed and is nearly ideal for that purpose (and because the two public trails at either end of the Hope Camp Trail, the Arizona Trail and the Hope Camp Trail segment on Rocking K Ranch, will be open to nonmotorized shared use).
- **Arizona Trail**. We support the Arizona Trail alternative depicted on the Alternative A map. We seriously doubt that the alignment shown on Alternative B is feasible, for several reasons: first, insufficient right-of-way exists along Old Spanish Trail to accommodate the trail; second, because horses are not allowed on the Tanque Verde Ridge Trail, which is inconsistent with the nature of the Arizona Trail, and third, because private property would need to be acquired to accommodate the trail west of Camino Loma Alta, which would be extremely difficult. The Alternative A Arizona Trail alignment is far superior.
- **Old Spanish Trail Bike and Pedestrian Path**. The Old Spanish Trail Bicycle and Pedestrian Path is in place from Broadway Blvd. to the park's main gate, as are several segments constructed by developers in the Rincon Valley. Pima County hopes to eventually connect the current terminus of the path at the park's main gate with segments of the trail in the Rincon Valley and achieve a continuous trail from Broadway to the main gate of Colossal Cave Mountain Park. Therefore, we believe it is important to include this pathway in the park's trails plan.
- **Cactus Forest Trail System Reductions**. Pima County understands the park's desire to remove redundant trails from the upper Cactus Forest area to simplify its system. However, as you know, these trails and wash segments are very popular with equestrians, and some valid points have been raised regarding the use of washes as trails and the fact that most of the trails that will be retained have rock steps that pose safety challenges for equestrians. We recommend that the park work directly with the equestrian community to discuss the issues associated with this area in order to arrive at a consensus solution that is satisfactory to all.
- **Broadway Trailhead**. The trails community remains interested in having a formal trailhead facility of some kind constructed at the east end of Broadway Boulevard to enhance visitor safety, and NRPR supports that goal. Where the trailhead will actually be located is up to the park, but we support a trailhead at the end of Broadway.

connectivity on the eastern boundary of the West Unit, and requests that park staff work with this group to resolve their issues if possible.

Thank you for the opportunity to comment. Please don't hesitate to be in touch if we can provide you with any additional information or assistance.

Sincerely,

Steve Anderson

Steve Anderson, Principal Planner



- **Camino Loma Alta**. A formal trailhead facility is needed at the northern end of Camino Loma Alta in the Rincon Valley, and should be included in the plan.

**Key Elements: Tucson Mountain District**.
Generally speaking, NRPR prefers Alternative B over alternative A. Key elements that should be in the final version of the park's trails plan for the West Unit include:

- **Gas Line Trail**. The Gas Line Trail is listed on the Eastern Pima County Trail System Master Plan, and has always been a shared use trail. The gas line was included as a shared use opportunity in the park's West Unit Trails Plan.
- **CAP Linkage Trail**. NRPR supports the proposal to create a linkage between the Red Hills Visitor Center and the CAP Trailhead. This linkage should be shared use, and would connect the western boundary of the park to the regional trail system. Ideally, a new shared-use loop trail opportunity would be created in the southwest corner of the park that would connect to Red Hills and the CAP Trailhead, and provide an accessible opportunity to park visitors staging at Red Hills.
- **Northeast Access Point**. NRPR strongly supports the provision of gate access in the eastern boundary of the park near Artesiano Road to ensure trail system access to the many equestrians who live in that area.
- **King Canyon Trailhead**. NRPR is committed to working with the park to relocate this trailhead at the earliest opportunity to enhance the safety of park visitors and trail users.
- **Belmont/Gas Line Trailhead**. The trails plan for the West Unit of the park recommended that a trailhead staging area be created at the intersection of Belmont Road and the Gas Line, and we support that proposal. This trailhead has broad community support and would help resolve the problem of inadequate access to the park along the urban fringe.
- **Box Canyon Trailhead**. The current Box Canyon Trailhead location is problematic, but relocating it to the south side of Picture Rocks Road could create new safety problems. We're not sure how to best counsel the park on this issue; it may be preferable to leave the current site in place and work to reduce speeds on Picture Rocks Road in proximity of the trailhead.
- **Golden Gate Road**. NRPR supports the proposal to close Golden Gate Road to motorized vehicles, which will create a new opportunity for trail users, including bicyclists.
- **Tucson Mountains Riders Comments**. NRPR is aware that the Tucson Mountains Riders group has concerns about access issues and

PIMA COUNTY
REGIONAL FLOOD CONTROL DISTRICT
97 EAST CONGRESS STREET, THIRD FLOOR
TUCSON, ARIZONA 85701-1797

SUZANNE SHIELDS, P.E.
DIRECTOR

(520) 243-1800
FAX (520) 243-1821

October 1, 2007

Sarah Craighead
Saguaro National Park
3693 S. Old Spanish Trail
Tucson, Arizona 85730-5601

**Subject: Saguaro National Park General Management Plan/Environmental Impact Statement – Draft**

Dear Sarah Craighead:

The Pima County Regional Flood Control District supports the Preferred Alternative in the Saguaro National Park Draft General Management Plan/EIS. Protecting sensitive resources and habitat areas, especially those associated with riparian zones and wildlife corridors, should be given the highest priority. The roadways and all other areas in Saguaro National Park should have aggressive control of non-native invasive species. We support adding management activities to the sensitive and increasingly visited Rincon Creek trail area.

Sincerely,

Suzanne Shields, P.E.
Director and Chief Engineer

SS/tj

c: Julia Fonseca, Environmental Program Manager – Water Resources Division

**Southwest Office**
110 South Church, Suite 4292 | Tucson, AZ 85701 | tel 520.623.9653 | fax 520.623.0447
**www.defenders.org**

October 3, 2007

Superintendent Sarah Craighead
Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85730-5601

Re: Saguaro National Park General Management Plan EIS

Defenders of Wildlife (Defenders) is a national, not-for-profit conservation organization with over 522,000 members, including more than 16,500 members and activists who reside in Arizona. Defenders is dedicated to the protection of all native wild animals and plants in their natural communities. With offices throughout the United States as well as in Canada and Mexico, we work to protect and restore North America's native wildlife, safeguard habitat, resolve conflicts, and educate and mobilize the public.

On behalf of Defenders of Wildlife, I would like to commend the Saguaro National Park for developing a preferred management plan alternative that has conservation and ecological integrity as guiding themes and goals. This progressive management plan alternative is both congruent with and supportive of the National Park Service's mission:

> *...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.*

The Conservation Alternative (Alternative 2) identifies key management areas whereby the threats to biodiversity can most effectively be addressed, namely: protecting the function, composition and structure of the park's ecosystems. The additional emphasis on maintaining, protecting or even re-creating habitat connectivity in priority areas is critical, as anthropogenic habitat destruction and related fragmentation is the leading cause of species extinction world-wide (Pimm and Raven 2000). The following description of Alternative 2 codifies these important management priorities:

*In Alternative 2, the emphasis would be on protecting the park's ecological processes and biological diversity by connecting wildlife and plant habitats. Management efforts would focus on creating connections between isolated wildlife habitats and corridors. Visitation would be managed and redirected, when necessary, to protect sensitive resources and minimize impacts on resources.*

*Primitive and semi-primitive zones, which call for natural resources to be maintained in pristine to excellent condition, would make up the largest area of the park. Tolerance for resource modifications or degradation would be low, and preservation of wildlife habitat would be a major management focus in these zones. Park management would seek to reduce fragmentation of habitats and isolated wildlife corridors. Revegetation efforts would increase to improve habitat conditions.*

**National Headquarters**
1130 17th Street, N.W.
Washington, D.C. 20036-4604
tel 202.682.9400 | fax 202.682.1331

Alternative 2 is an excellent framework to adopt if the park is indeed serious about protecting the biological diversity supported by the lands and ecosystems it manages. Dedicating the largest portion of the park to primitive and semi-primitive zones; seeking to minimize degradation and fragmentation while preserving and enhancing existing habitats and corridors; managing and redirecting visitation to protect sensitive natural and cultural resources – these management priorities set the stage for an ecologically viable Saguaro National Park.

S. A Parks and A. H Harcourt (2002) found that: (1) processes occurring outside of a reserve's boundary may unexpectedly strongly affect species within the reserve; (2) small reserves might suffer the double jeopardy of not only their size but also their situation in especially adverse surrounds; and thus (3) small reserves might suffer more intense edge effects and be more isolated than large reserves. This research focused on mammalian species, but some of the tenants may be applicable to other taxa. While Saguaro National Park has natural areas contiguous to its East and West units, Tucson and surrounding developed areas have collective and cumulative impacts (e.g. degradation, habitat fragmentation, pollution, invasive species introduction) on the Park's units. A management regime focused on conservation, preservation, restoration and habitat connectivity has the potential to compensate for these negative impacts and to maintain biodiversity and key ecosystem processes.

While the National Park Service has jurisdiction only over lands within its boundaries, we encourage Saguaro National Park to continue to work in tandem with adjacent land management agencies and land owners to ensure the integrity of the park is maintained and that connections to areas beyond park boundaries are protected and enhanced as appropriate. One way in which the Park has already demonstrated its commitment to working this way is via the Sonoran Desert Conservation Plan. The science conducted and available from the SDCP will continue to be of value, and should be integrated with the newly adopted management regime to the maximum extent possible.

Acquisition of additional land for expanding habitat and habitat connectivity is not always feasible for protected areas such as the Saguaro National Park that abut major metropolitan areas. However, as recognized in Alternative 2, taking steps to reduce habitat fragmentation or restore habitat conditions can create viable corridors and "stepping stone" habitats for a variety of species, including key pollinators, in and beyond the boundaries of the national park itself. It is important, however, that habitat connectivity is considered in the terms of the natural history and life history requirements of specific target species. Indeed, multiple species may benefit from the same corridor, which at the same time may be ineffective for others. A new science based GIS tool and model has been developed by the Beier Lab of Wildlife Ecology and Conservation Biology at Nothern Arizona University and the Arizona Department of Transportation, which may be of assistance to Saguaro National Park in its attempts to identify, preserve or restore species-specific or multi-species corridors using readily-available spatial datasets (see http://corridordesign.org/).

Thank you for your consideration of our comments. Please feel free to contact us with any questions or ideas regarding how Defenders might best support Saguaro National Park's progressive management actions.

Sincerely,

Matt Clark

Southwest Representative

Defenders of Wildlife

**Citations**

S.L. Pimm, P. Raven, 2000. Biodiversity: Extinction by numbers. *Nature* 403, 843-845 (24 February 2000). (available online at: http://www.nature.com/nature/journal/v403/n6772/full/403843a0.html)

S.A. Parks, A.H. Harcourt, 2002. Reserve Size, Local Human Density, and Mammalian Extinctions in U.S. Protected Areas Conservation Biology 16 (3), 800–808. (available online at: http://www.blackwell-synergy.com/doi/abs/10.1046/j.1523-1739.2002.00288.x)

SIERRA CLUB
FOUNDED 1892

**Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004**
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

September 29, 2007

Sarah Craighead
Superintendent, Saguaro National Park
3693 South Old Spanish Trail
Tucson, AZ 85775-3009

Via email, hardcopy to follow

**Re: Draft General Management Plan / Environmental Impact Statement**

Dear Superintendent Craighead:

Please accept these comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our more than 14,000 members. Our members hike, horseback ride, and view wildlife in Saguaro National Park (SNP) as well as enjoy the solitude that back country camping offers in the Rincon Mountain District (RMD). SNP's unique natural beauty and recreational opportunities are of particular interest to the 4000+ members of the Sierra Club who live in the Tucson area.

**GENERAL COMMENTS:**

The Sierra Club strongly agrees that Alternative 2, the GMP Preferred Alternative, provides the greatest protection for the natural ecological processes and biological diversity that defines the uniqueness of SNP. The National Park Service Organic Act (16 U.S.C. I 2 3 and 4) states:

> *"The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purposes of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

It is within that context that we provide these additional comments. It is critical that the National Park Service develops a GMP that protects the "natural and historic objects and the wildlife" so they will be here for future generations.

The no action alternative (Alternative 1) is incompatible with this goal. This alternative implies continued resource damage, habitat fragmentation, reduction of solitude and natural quiet, harmful trail design, user trail conflicts, and excessive commuter speeds and volume on Picture Rocks and Sandario Roads in the Tucson Mountain District (TMD).

Printed on Recycled Paper

SIERRA CLUB
FOUNDED 1892
Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

Alternative 3 is also inconsistent with the National Park Service Organic Act. It places undue emphasis on recreational development to the detriment of the ecological processes, biological diversity and natural beauty that makes SNP distinctive. It would lead to an ever increasing and unsustainable numbers of park visitors. The Sierra Club does not believe that park infrastructure and program can be continually remodeled to accommodate endless visitors to SNP. The extraordinary stands of saguaro cacti, sensitive wildlife habitat, essential riparian areas, and natural quiet and solitude cannot be protected without limiting the number of visitors and access to critical areas of the park.

We believe that Alternative 2 is most likely to accomplish the following objectives.

**RESOURCE PROTECTION**

- Manage the Park to maximize pristine resource conditions which protect natural processes, biodiversity, and the ecosystem.
- Closely administer and redirect visitation to protect sensitive resources.
- Ensure that recreational opportunities, particularly in the RMD wilderness areas, are primitive with low visitor use.
- Reduce fragmented habitats and isolated wildlife corridors to insure biological diversity.
- Limit to the greatest degree possible, the invasion of non-native plant and animal species that negatively affect the native flora and fauna. Of particular concern are non-native plants such as buffel grass and fountain grass.

Sensitive Areas

- Consider regulating access to the sensitive Madrona/Chimenea riparian area by park-issued permit.
- Manage the Freeman Homestead and Wild Horse sensitive zones to protect these fragile riparian areas.

**TRAILS**

- Close and rehabilitate wildcat, parallel and duplicate trails in both park districts. The 17 square mile Cactus Forest area in the Rincon Mountain District is a troubling example of what happens to wilderness values when the terrain is suffocated by a mélange of wildcat, duplicate and parallel trails. The Sierra Club participated in the trail planning meetings and its members look forward to a final comprehensive trail plan that does not damage the natural resources of the Park. Sierra Club members have participated in and will continue to participate in vegetation rehabilitation efforts.
- Do not permit off-trail travel in the TMD and in the RMD below 4500 feet in altitude.
- Make sure hikers and backcountry campers can experience the solitude and natural quiet of remote wilderness areas.

SIERRA CLUB
FOUNDED 1892
Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

- Ensure that trails in the sensitive, primitive, semi-primitive and wilderness areas are single track and unpaved.
- Allow biking to continue on the middle section of the Cactus Forest trail and on the open roads. The preferred alternative calls for exploring biking opportunities along the Hope Camp Trail in the RMD. We do not object to allowing bikes along this old roadway as long as connecting bike trails do not pass through primitive, semi-primitive, sensitive or wilderness areas and are kept on the park margins.
- Explore biking opportunities along the gas line ROW in TMP as long as the bike trail does not pass through primitive, semi-primitive, or sensitive areas.
- Prohibit biking on all other trails in the park to protect the safety and quality of experience of the other trail users. Explore the need for single-use trails to reduce trail user conflicts.

**ROADS**

The multiple entrances to TMD and its through-park roads currently encourage commuters to enter the park, allow excessive speeds and traffic, conflict with park visitors, and damage resources and wildlife along the roadways. According to a recent study in the Park, more than 50,000 animals are killed on roads in or near the Park each year. Slowing or re-directing this traffic will help protect both people and wildlife and should be a priority in the Park's transportation plan.

- Use calming devices on Picture Rock Road (speed bumps, reduced speed limits, stop signs, limits on commercial traffic, traffic circles, or creating one-way traffic). If the calming devices and re-direction are not effective, this road should be converted to multiple use trails.
- Convert Golden Gate Road between Ez-Kim-In-Zin picnic area and Picture Rocks road to a multiple use trail.
- Redesign the scenic Bajada Loop Drive into a narrower, paved, one-way scenic loop. A new section of this loop drive could be built to move park traffic off Sandario Road. The removal of loop drive/park traffic from Sandario Road would improve safety conditions along both Sandario Road and the scenic Bajada Loop Drive.
- As future park visitation increases, consider closing the Cactus Forest Road Loop in the RMD to autos and initiating a seasonal shuttle.

**CAMPING**

- Permit backcountry camping in the RMD.
- Construct no new camping facilities in primitive or wilderness areas.
- The park staff should consider developing at Manning Camp a minimal impact shared work center/duty station with the U.S. Forest Service for initial fire response.

SIERRA CLUB
FOUNDED 1892
Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

- •Only minimal support facilities should remain at Manning Camp such as the vault toilet, water system, corrals, and hitching posts.
- Do not remove the historic Manning Cabin.
- Permit backcountry camping at Manning Camp.
- Do not use extraordinary fire suppression that negatively affects primitive and wilderness values in the park.

**FACILITIES AND MANAGEMENT ACTIVITIES**

The administrative facilities in the RMD are inadequate. Every effort needs to be made to locate staff operations and adequate facilities off the RMD site.

- In the interim, SNP should consider expanding the visitor center in the RMD to provide additional exhibit and office space.
- The park should explore developing an outdoor environmental education site near the Camino Loma Alta trailhead to provide additional interpretive opportunities.
- SNP need to find increased space in the RMD for an education center that focuses on wilderness values, interpretation and backcountry permitting.
- The Tucson Mountain District visitor center should remain as is. Focus programs in the TMD on interpretative nature displays, sightseeing corridors and recreation.

**PARTNERSHIPS**

We encourage the Park to continue and develop partnerships that help support the NPS mission to protect the SNP's resources. Partnerships that commercialize, put recreation above the protection of resources, or allow increased road building in or near the Park, should be avoided

Thank you for providing this third opportunity to comment on the development of the CMP. If you have any questions regarding our comments, please do not hesitate to contact us at 520-749-3829, kplangton @msn.com, or Sandy Bahr (602) 253-8633, grand.canyon.chapter@sierraclub.org, or Don Steuter dsteuter@hotmail.com, (602) 956-5057

Kenneth Langton

Dr. Kenneth Langton
Chair of the Parks and Refuges Committee
Grand Canyon Chapter of the Sierra Club

Printed on Recycled Paper
4

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS D-134A February 2008 / Printed on recycled paper.