

SAGUARO NATIONAL PARK  
ARIZONA  
NATIONAL PARK SERVICE  
U.S. DEPARTMENT OF THE INTERIOR



# *Saguaro National Park*

Abbreviated Final  
General Management  
Plan / Environmental  
Impact Statement

*January 2008*



**Abbreviated Final  
General Management Plan / Environmental Impact Statement  
Saguaro National Park  
Pima County, Arizona**

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Saguaro National Park was established by President Herbert Hoover on March 1, 1933. Originally named Saguaro National Monument, the status was changed to Saguaro National Park by an act of Congress on October 14, 1994. The last general management plan for the park was completed in 1988. Much has changed since 1988 — visitor use patterns and types have changed, the population of the city of Tucson has doubled, and an additional 7,577 acres have been added to the park. Each of these changes has implications for how visitors access and use the national park and the facilities needed to support those uses, how resources are managed, and how the National Park Service manages its operations. A new plan is needed.

The *Draft General Management Plan / Environmental Impact Statement* examines three alternatives for managing the park for the next 25 years. It also analyzes the impacts of implementing each of the alternatives. The “**no-action**” **alternative 1**, consists of continuing the existing park management and trends and serves as a basis for comparison in evaluating the other alternatives. The concept for park management under **alternative 2** would be to protect the park’s ecological processes and biological diversity by reducing fragmentation of wildlife and plant habitats and protecting wildlife corridors. The concept for park management under **alternative 3** would be to provide a wider range of opportunities for visitors that would be compatible with the preservation of park resources and wilderness characteristics. Alternative 2 is the National Park Service’s preferred alternative.

The *Draft General Management Plan / Environmental Impact Statement* was distributed to other agencies and interested organizations and individuals for their review and comment. This *Abbreviated Final General Management Plan / Environmental Impact Statement* presents the comments and agency responses and a correction (errata) sheet that shows the minor changes that need to be made to the draft. The draft and the abbreviated final constitute a full final document. Because these changes were minor, the National Park Service has permission to print this abbreviated document.

For further information, please contact the superintendent, Saguaro National Park, 3693 South Old Spanish Trail, Tucson, AZ 85730-5601.



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## INTRODUCTION

This is an abbreviated *Final General Management Plan / Environmental Impact Statement* for Saguaro National Park. The material included here is to be combined with the *Draft General Management Plan / Environmental Impact Statement*, which was distributed for public review August 1, 2007. The 60-day public review period ended October 3, 2007. The abbreviated format has been used because the changes to the draft document are relatively minor and do not modify the analysis provided in the *Draft General Management Plan / Environmental Impact Statement*.

Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 *Code of Federal Regulations* or CFR 1503.4 (c)). The draft and abbreviated final documents together present the full *Final*

*General Management Plan / Environmental Impact Statement*, its alternatives, associated environmental impacts, and comments that have been received and evaluated and responses to them.

Following the announced release of this *Abbreviated Final General Management Plan / Environmental Impact Statement* in the *Federal Register*, there will be a 30-day no-action period. A “Record of Decision” of the approved final plan will then be signed by the regional director, Intermountain Region, National Park Service (NPS), and copies will be made available to the public.

For further information, please contact the superintendent, Saguaro National Park, 3693 South Old Spanish Trail, Tucson, AZ 85730-5601.

## CONSULTATION AND COORDINATION

This section summarizes the agency, organization, and public comments received on the *Draft General Management Plan / Environmental Impact Statement*. These comments allow interested parties (including NPS decision-makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed actions and alternatives and their potential impacts. The National Park Service provides responses to those comments that are considered substantive or when responses are helpful for clarification or other purposes.

Substantive comments are those that (1) question, with reasonable basis, the accuracy of information in the environmental impact statement, (2) question, with reasonable basis, the adequacy of environmental analysis, (3) present reasonable alternatives other than those presented in the environmental impact statement, or (4) cause changes or revisions in the proposal.

### PUBLIC REVIEW

A notice of availability of the *Draft General Management Plan/ Environmental Impact Statement* was published in the *Federal Register* on August 1, 2007. The draft document was distributed to the public August 2, 2007. The official review and comment period began on August 5, 2007, and ended October 3, 2007. Approximately 3,000 individuals received either a copy of the document or a CD-ROM version of the document or were notified by postcard that the document was available on the NPS Planning, Environment, and Public Comment (PEPC) website. These individuals also received information about the dates, times, and locations of three public open house meetings held in the Tucson area. The availability of the document and information

about the public meetings were also announced in the local newspaper.

Three public meetings were held. On September 5, 2007, meetings were held from 11:00 a.m. to 1:00 p.m. at Pima Community College Downtown and from 4:00 p.m. to 7:00 p.m. at Picture Rocks Intermediate School. On September 6 a meeting was held from 4:00 p.m. to 7:00 p.m. at Pima County Community College East. At each of these open house meetings, a separate station was provided for those members of the public who were interested in the *Comprehensive Trails Plan* being conducted as a separate planning effort. A total of 84 individuals attended the meetings. Public comments were recorded by the planning team.

The *Draft General Management Plan/ Environmental Impact Statement* was also sent out certified return receipt mail on August 1, 2007, to 12 tribes (federally and state recognized) that have been identified as having a cultural affiliation with the park. The tribes were asked to review the draft document and provide the National Park Service with comments. One tribe responded with no comments on the draft document.

Approximately 190 written and electronic comments were received. The public did not present any new alternatives and public comment analysis did not result in any modifications to the current alternatives. Letters from federal, state, and local governments and organizations are reproduced on the following pages, as required. These entities either supported alternative 2 or had no comment. The Environmental Protection Agency commented on climate change; the NPS response is included in the comments and responses below.

The public's comments have been considered by the Park Service in preparing this *Abbreviated Final General Management Plan/ Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. The following section summarizes substantive comments and contains the NPS response. The National Park Service responses make factual changes, clarify or provide new information, or explain why the public comments do not warrant further agency response.

## COMMENTS AND RESPONSES

**Comment:** The United States Environmental Protection Agency rated the draft document as LO — Lack of Objections. However, they recommended that the “plan address the potential effects of climate change on park resources and how the National Park Service will adaptively manage affected resources.” (This letter is reproduced in this document.)

**NPS Response:** Because the issue of global climate change is an emerging scientific field, the *General Management Plan* did not address this topic specifically. As part of NPS inventorying and monitoring efforts the park staff will establish a program to track associated effects on park resources as a result of climate change. If and when effects are identified through this program, the park staff would then recommend necessary changes in management policies, but at this stage, there is not enough information to calculate or quantify impacts or to recommend management strategies at the general management planning level. This is true for all associated resources mentioned related to climate change, including but not limited to water resources, vegetation, habitat, wildlife, and cultural resources. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

**Comment:** Several individuals commented on the proposed restriction of off-trail hiking below 4500' in the Tucson Mountain District (page 83). The commenters suggested that this restriction limits opportunities for solitude and unconfined recreation, freedom, orienteering, and that it reduces wildlife and nature observation opportunities. They also suggested it was a violation of the Wilderness Act that is intended to promote high-quality opportunities for solitude and primitive recreation.

**NPS Response:** The National Park Service is mandated to protect resources while allowing for appropriate recreational opportunities. The Tucson Mountain District in Saguaro National Park contains natural and cultural resources that are highly sensitive to recreation-related impacts. The *General Management Plan* proposes a restriction of “off-trail” activity below 4,500 feet for both districts to concentrate use and associated impacts along designated trails, which are designed and maintained to minimize resource impacts. As noted throughout the environmental consequences section, even small amounts of off-trail travel causes vegetation loss, soil compaction, and habitat fragmentation, and such travel facilitates intentional, as well as unintentional, loss of archeological and other sensitive cultural and natural resources. As residential development around the Tucson Mountain District increases and more people seek to explore the park off-trail, these impacts would increase.

Providing the highest level of protection for the park's sensitive vegetation and cultural resources below 4,500 feet is the motivation for restricting travel in the park to designated trails. The intent is to keep areas outside the designated trail system in a relatively undisturbed state. This is also consistent with management of the Rincon Mountain District. The Wilderness Act



(Public Law 88-577) does not prohibit the management of visitor use to protect resources, and it allows for primitive facilities such as trails and campsites to facilitate travel and concentrate recreation-related impacts. As referenced throughout the document, the National Park Service is evaluating new trail opportunities as part of the *Saguaro National Park Comprehensive Trails Plan* in some areas of the Tucson Mountain District that currently lack designated trails. These new trail opportunities will be designed to sustain visitor activity, and will provide access to areas of the park that currently are only accessible through off-trail activities. Further, the park will increase efforts to educate visitors about less crowded times of the day, week, and year and use levels on different trails to help them find plentiful opportunities for solitude and immersion in nature while staying on the designated trail system. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

**Comment:** A commenter favored the creation of ADA-accessible trails (page 83), but felt that any trail developed in the southwestern section of the Tucson Mountain District (natural zone on alternative map) was in the park's only badger habitat and possible construction of a paved trail was inadvisable. The commenter further indicated that this area was the only place in either district where badgers were observed and where dens and digging could be found.

**NPS Response:** The park staff appreciates the commenter's concern for the identified species; NPS resource managers are also concerned about the continued well-being of this species and the habitat required for its survival. Although badgers have been identified in this location, the historic range for this animal was throughout the area, including both park districts and the Tucson Mountain Park. Contemporary

sightings indicate that, while uncommon, badger populations are more widespread, especially in the Tucson Mountain District, so this is not the only location where badgers have been observed. Where trails are proposed as part of the *Comprehensive Trails Plan*, NPS staff would seek trail alignments that avoid badger habitat and dens and implement best management practices to minimize disruptions to known populations. If specific potential impacts on badgers are identified, NPS staff would develop methods to mitigate these impacts. It is unlikely that trail construction or subsequent use would appreciably impact badgers, and more unlikely that such an activity would alter their population. Therefore, no change is needed to the *General Management Plan / Environmental Impact Statement*.

**Comment:** A commenter expressed their fear that the "facts were being shaped to support the park's preferred alternative regarding the road kill count-by-extrapolation, which makes it seem worse than we who are on these roads daily have observed."

**NPS Response:** The *General Management Plan* does not quantify animals killed under the existing conditions or proposed alternatives. Rather, it recognizes the relative impacts of the alternatives on wildlife populations. We do know that park wildlife is killed by automobile traffic, and that one of several objectives in this *General Management Plan* is to improve conditions that adversely impact park wildlife. The preferred alternative would do this if roadway improvements are put into operation. In addition, animals killed on park roads, referred to in the document as "road kill," was only one of several criteria the park staff considered when looking at methods to improve the existing conditions on Picture Rocks Road as described on pages 25 and 61. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*.

**Comment:** A comment was received concerning air quality issues (page 34) as follows:

“Chapter 1 addresses air quality issues in the Natural Resources Section of the Plan. EPA is proposing revisions to the primary ozone standard and is also proposing the addition of a secondary ozone standard to protect public welfare, including limiting environmental damage to sensitive vegetation, and ecosystems. EPA timelines project a June 2008 effective date for the revision. While the Park may have only limited ability to affect the ozone levels in the area, it is important to consider such impacts in finalizing the Plan. To the extent alternatives are available that have lower air emissions those should be favorably considered. EPA projections show that the Tucson area may become a nonattainment area if the standards are finalized as currently proposed. All management and control strategies that result in lower air emissions will help to improve our air quality and will be especially important with the promulgation of new ozone standards.”

**NPS Response:** Under the current regulations, the park meets National Ambient Air Quality Standards. Although current projections for revising standards indicate June 2008 as the effective date, the regulations have yet to be revised and so current regulations apply. The park is required by law and policy to meet or exceed regulations and will continue to monitor conditions. Under all proposed actions outlined in the *Draft General Management Plan*, park contributions to this problem would be negligible both in the short term during construction and/or implementation and in the long term as part of general management. If conditions and/or standards change in the future, the park would reassess and adjust manage-

ment actions and activities accordingly. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*.

**Comment:** Concurrently with the *General Management Plan*, the National Park Service is conducting a *Comprehensive Trails Plan* for Saguaro National Park. Some members of the public developed an “alternative C” as part of the trail plan effort. Several commenters on the *General Management Plan* requested feedback on this alternative.

**NPS Response:** Alternative C is not part of the *General Management Plan / Environmental Impact Statement*. This alternative contains a detailed description of specific trail recommendations (e.g., new trails to open, trails to delete, trails to reopen, and new access points to develop) and is being considered and analyzed as part of the comprehensive trails planning project. The *General Management Plan* does not include this level of specificity for trail planning. The *General Management Plan* does provide long-term, general guidance on the park’s desired natural and cultural resource conditions and visitor experiences, as well as general types/levels of development that direct subsequent trail planning efforts. Therefore, no changes are needed to the *General Management Plan / Environmental Impact Statement*. However, the goal of the *Comprehensive Trails Plan* has been included in the *General Management Plan* as indicated in the correction sheet.

**Comment:** A commenter questioned the acreage of a use and occupancy reservation (page 11). The document states there is an outstanding reservation of use and occupancy (life estate) on a 40-acre tract in the Rincon District while NPS policy states that such reservations are limited to the homesite and 3 acres.

**NPS Response:** The 40-acre tract located in the Rincon Mountain District became a life estate in 1972 and is still in effect. At that time there were no policies on the size of life estates. The 1979 Land Acquisition Policy did limit the size of life estates to 3 acres plus the structures. In 2001, a new life estate was added to the Tucson Mountain District under the 1979 policy. This clarification has been included in the correction sheet in this document.

**Comment:** One commenter did not support the proposal to build a new section of the Bajada Loop Drive (page 78) to move park visitor traffic off Sandario Road to improve safety. It was mentioned that no documentation for this action was provided.

**NPS Response:** The *Draft General Management Plan* does refer to the high accident rate on the section of Sandario Road where Bajada Loop Road travelers must enter and exit Sandario Road on pages 165 and 205-206. Although the park and county maintain safety records for this section of roadway (among others), the references were not cited in the document. These references have been included in the correction sheet in this document.

**Comment:** A number of commenter's expressed concern about the use of the right-of-way of the El Paso Gas Company — shown on the alternative 2 map for Tucson Mountain District, page 79 — as a horse, bicycle, and hiking trail. They were concerned about safety.

**NPS Response:** The gas line right-of-way is currently being used as a trail. The El Paso Gas Company has expressed an interest in cooperating with the park to develop a multiuse trail along this right-of-way. Aside from vehicles involved in pipeline maintenance, no motorized, off-road vehicles would be permitted. The trail is identified in the *Eastern Pima County's Trail System Master Plan*. However, the alternative map for the Tucson Mountain District incorrectly shows a proposed trailhead at the southern terminus of the gas line right-of-way. This trailhead is not planned and will not be developed. A corrected version of the Tucson Mountain District alternative 2 map has been included in this document.

**Comment:** A commenter questioned the absence of two articles on the flora and vegetation of the park's two districts in the selected references.

**Response:** Thank you. We will add these references.

## DRAFT GMP/EIS CORRECTIONS

This section contains those changes that should be made to the *Draft General Management Plan/Environmental Impact Statement*. Some of these changes are a result of public comments while others are editorial in nature. Please make the following changes:

### Page 10 — The Primary Interpretive Themes

The themes have been further refined. Please replace them with the following:

- The dichotomy of the Saguaro Wilderness, so close to a rapidly expanding urban area, provokes and welcomes us to explore the mysteries of nature for spiritual renewal and healing, and also inspires us to protect and preserve similar places.
- Saguaro National Park's Rincon Mountains are the largest road-less "Sky Island" in the Sonoran Desert — a uniquely pristine and diverse biotic community that provides exceptional opportunities for exploration, education, research, and wonder.
- People have adapted to, influenced, and lived in the Sonoran Desert since prehistoric times; fruit harvesting and hunting, homesteading and grazing, urbanizing and mining, recreating and exploring, resource and fire management are but a few examples of decisions and subsequent impacts that continue to affect this unparalleled landscape.
- The saguaro, the most recognizable cactus in the world, is a symbol with emotional significance spanning centuries and cultures, and it is a keystone species in an interdependent community (of plants, animals, and humans) adapted for living and thriving in this harsh arid environment.

### Page 11 — Life Estates

Please replace the sentence with the following. The park contains two life estates or reservations of use and occupancy: a 40-acre parcel in the Rincon Mountain District and a 5-acre parcel in the Tucson Mountain District. Both of these life estates are still in effect. The 40-acre parcel was added in 1972. At that time there were no policies regarding size of life estates. In 1979, the Land Acquisition Policy limited the size of life estates to 3 acres plus the structures. A life estate was added to the Tucson Mountain District in 2001 under the 1979 policy. This life estate is 5 acres, including the structures.

### Page 20 — Comprehensive Trail Plan Goal

Please add the following in the first column, before the last sentence: The goal of comprehensive trail plan is to provide a comprehensive, well-designed, sustainable trail system that provides reasonable access and a variety of visitor trail recreation experiences, consistent with the purpose and significance of the park.

### Page 79 — the Tucson Mountain District Alternative 2 Map

This map has been revised. The words "proposed trailhead" on the southern terminus of the gas line right-of-way were removed. Please insert the new map provided.

### Page 87 — the Tucson Mountain District Alternative 3 Map

This map has been revised. The words "proposed trailhead" on the southern terminus of the gas line right-of-way were removed. The location of state and county land has been indicated. Please insert the new map provided.



Page 104 — Future Studies and Implementation Plans Needed

Please delete the second bulleted item in the first column — the *Fire Management Plan*. This plan has been completed. Add “boundary study” as the last bullet.

Page 165 — Roadway Issues and Concerns

Please add the following sentence to column one, the first paragraph: Since 2003, there have been 20 accidents and 11 injuries in the vicinity of the Sandario/Kinney Road intersection, and 6 accidents and 3 injuries on Golden Gate Road.

Pages 304 and 305 — Appendix A: Legislation

The legislation should be in chronological order. Pages 304–305 should become pages 302–303, and pages 302–303 should become pages 304–305.

Page 368 — Selected References

Please add the following:

Bowers, Janice E. and McLaughlin, Steven P.


1987 “Flora and Vegetation of the Rincon Mountains, Pima County, Arizona”. *Desert Plants*. 8(2): 50-94.

Renée Rondeau, Thomas R. Van Devender, C. David Bertelsen, Philip Jenkins, Rebecca K. Wilson, and Mark A. Dimmitt

1996 “Annotated Flora and Vegetation of the Tucson Mountains, Pima County, Arizona.” University of Arizona for Boyce Thompson Southwestern Arboretum.

## Legend

 PARK BOUNDARY

 TRAIL

 STATE LAND

 COUNTY LAND

 PRIVATE LAND

## Management Zones

 SENSITIVE ZONE

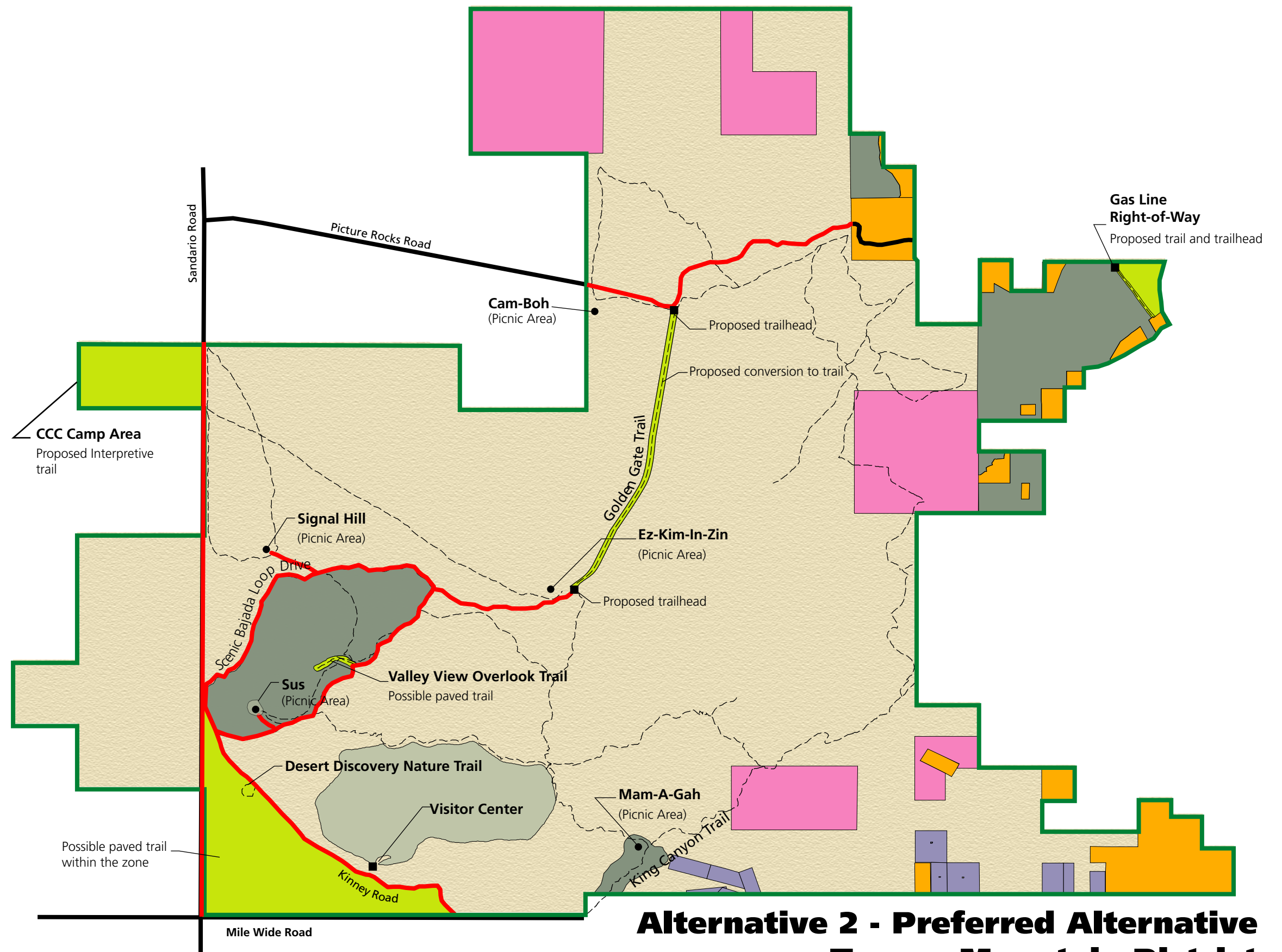
 PRIMITIVE ZONE

 SEMI-PRIMITIVE ZONE

 NATURAL ZONE

 SIGHTSEEING CORRIDOR ZONE

 DEVELOPED ZONE



## Alternative 2 - Preferred Alternative Tucson Mountain District

General Management Plan  
Saguaro National Park


United States Department of the Interior • National Park Service  
DSC / JUNE 2006 / 151 / 20059





## Legend

 PARK BOUNDARY

 TRAIL

 STATE LAND

 COUNTY LAND

 PRIVATE LAND

## Management Zones

 SENSITIVE ZONE

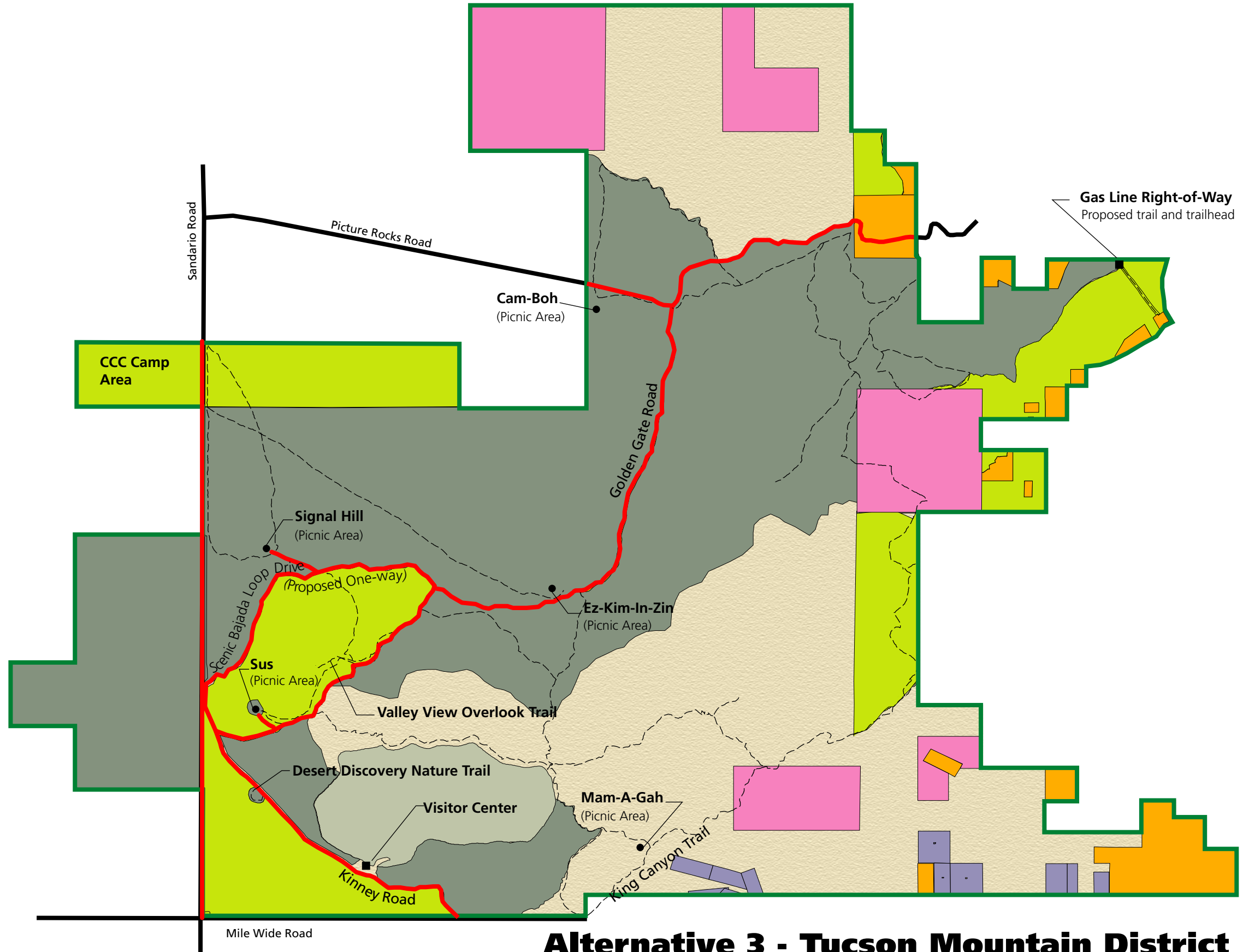
 PRIMITIVE ZONE

 SEMI-PRIMITIVE ZONE

 NATURAL ZONE

 SIGHTSEEING CORRIDOR ZONE

 DEVELOPED ZONE



## Alternative 3 - Tucson Mountain District

## General Management Plan Saguaro National Park

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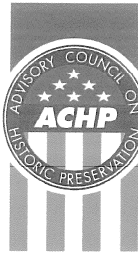
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## **AGENCY AND ORGANIZATION LETTERS**

FEDERAL AGENCIES



*Preserving America's Heritage*

September 13, 2007

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

REF: *Notification for Development of General Management Plan  
Saguaro National Park, Arizona*

Dear Ms. Craighead:

The Advisory Council on Historic Preservation (ACHP) recently received your notification for the development of a General Management Plan for the Saguaro National Park, Arizona, pursuant to stipulation VI.D. of the 1995 Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. We encourage the park to continue consulting with the Arizona State Historic Preservation Officer (SHPO) and interested Native American tribes, as well as other interested parties, in the development of this plan.

Should the park determine, in consultation with the SHPO, tribes, and other consulting parties, that its preferred alternative may have an adverse effect on properties listed or eligible for listing on the National Register of Historic Places, we request that you notify us of the adverse effect and provide adequate documentation for our review. The ACHP's decision to participate in the consultation to resolve adverse effects to historic properties will be based on the applicability of the criteria in Appendix A of the ACHP's regulations, "Protection of Historic Properties" (36 CFR part 800).

Thank you for providing us with this opportunity to comment. If you have any additional questions or require the further assistance of the ACHP, please contact Kelly Yasaitis Fanizzo at (202) 606-8583, or by email at [kfanizzo@achp.gov](mailto:kfanizzo@achp.gov).

Sincerely,

Reid Nelson  
Assistant Director  
Federal Property Management Section  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

September 26, 2007

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

Subject: Saguaro National Park Draft General Management Plan/Environmental Impact Statement (EIS), Pima County, Arizona [CEQ #20070322]

Dear Ms. Craighead:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The National Park Service's (NPS) Preferred Alternative involves numerous improvements and positive operational changes to better protect Saguaro National Park's resources over the next 25 years. In addition, the Draft EIS identifies many effective mitigation measures and adaptive management strategies that could be used to protect or reduce impacts to cultural and natural resources, visitor safety and experiences, and socioeconomic environment, among others. Therefore, we have rated this Draft EIS as LO – Lack of Objections (see the enclosed "Summary of Rating Definitions").

In light of the long life of the plan and the Government Accountability Office's recent report, "Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources" (August 2007), we recommend that the General Management Plan address the potential effects of climate change on park resources and how NPS will adaptively manage affected resources. For example, climate change could influence long-term vegetation trends in the park where increases in exotic plant species produce fuel for larger and more frequent wildland fires. Increased severity and frequency of wildland fires could destroy more native plants and transform some vegetation communities into annual grasslands. These impacts could further increase the fire danger, erosion, sedimentation, and chemical and nutrient loads in surface waters, resulting in adverse impacts to water quality and quantity, valuable desert riparian areas, and species diversity. The Draft EIS briefly addresses water quantity as an issue that was dismissed from further consideration because the management alternatives would have negligible adverse impacts on water quantity in the park. An analysis of water quality appears to have been overlooked as it is neither discussed nor dismissed from further




## FEDERAL AGENCIES

consideration in the Draft EIS. Both these resources should be addressed in light of the cumulative, long-term effects that could result from climate change.

EPA recommends that the Final EIS include analyses of the potential impacts of climate change, over the life of the General Management Plan, on park resources such as water quality and quantity, vegetation/habitat and exotic species, wildlife, special status species, species diversity, and cultural resources. The Final EIS and General Management Plan should discuss how NPS plans to adaptively manage affected resources, including operational and monitoring needs.

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3846, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,



Nova Blazej, Manager  
Environmental Review Office

004142  
Enclosure

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."



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

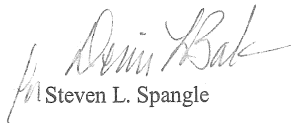
To: Superintendent, National Park Service, Tucson, Arizona (Attn: Sarah Craighead)

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).

  
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:egg

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](mailto: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) 398-6026

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. 123 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.

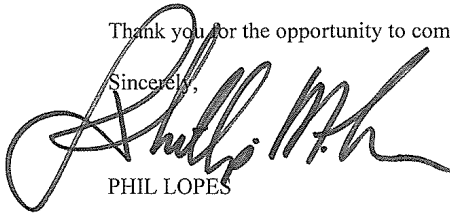
I support the closure and rehabilitation of wildcat, duplicate and parallel trails in both park districts and agree with limiting off-trail travel in the Tucson Mountain District and in the Rincon Mountain District below 4500 feet in altitude in order to protect the Park's fragile soils, plants, and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

A handwritten signature in black ink, appearing to read "Phil Lopes", with a large, stylized initial "P" and "L".

PHIL LOPES

048



SAPD- 2002-2363 (33855) ONAE  
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

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

AUG 03 2007

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  
*Ann O. Howard* 9-11-07  
for ARIZONA STATE HISTORIC PRESERVATION OFFICER  
ARIZONA STATE PARKS BOARD  
(as per Dr. Bill Collins's review.)



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](http://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

A handwritten signature in black ink, appearing to read "Tim Bolton".

Tim Bolton  
Principal Planner





**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.

Sarah Craighead  
Saguaro National Park GMP / EIS  
October 3, 2007  
Page 2

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.

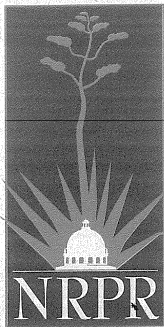
Thank you for the opportunity to provide comments on the park's General Management Plan and Environmental Impact Statement, and look forward to continued coordination with Saguaro National Park in the future. Should you have questions or require additional information, please contact me at (520) 740-6762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

Rafael Payan  
Director

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

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.

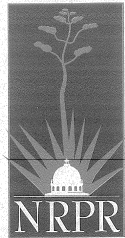
Thank you for the opportunity to provide comments. Please don't hesitate to contact me if I can provide you with any additional information or assistance.

Sincerely,

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

c: Rafael Payan, Director, PCNRPR

## 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

2

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 created.

- ❖ **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.

## COUNTY AGENCIES

4

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, Principal Planner

3

- ❖ **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,

A handwritten signature in dark ink, appearing to read "S Shields".

Suzanne Shields, P.E.  
Director and Chief Engineer

SS/tj

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

## ORGANIZATIONS



Southwest Office  
110 South Church, Suite 4292 | Tucson, AZ 85701 | tel 520.623.9653 | fax 520.623.0447  
[www.defenders.org](http://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 Northern 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.



## ORGANIZATIONS

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](mailto: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. 123 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).

## ORGANIZATIONS



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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.

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- 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.



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- 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](mailto:kplangton@msn.com), or Sandy Bahr (602) 253-8633, [grand.canyon.chapter@sierraclub.org](mailto:grand.canyon.chapter@sierraclub.org), or Don Steuter [dsteuter@hotmail.com](mailto:dsteuter@hotmail.com), (602) 956-5057

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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.

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