



April 3, 2023

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Submitted via email: middlegilasouth-tmp@blm.gov

RE: Middle Gila South Access and Transportation Management Plan

Arizona Sportsmen for Wildlife Conservation (AZSFWC) again appreciates the opportunity to provide input for the Middle Gila South Access and Travel Management Plan.

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as providing educational opportunities for outdoor enthusiasts on issues important to their passions. AZSFWC's member, associate and affiliate organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, and recreation groups from across Arizona, representing more than 27,000 people.

AZSFWC has been a longtime advocate for multiple use recreational activities on our public lands as well as supporting enhanced access to those lands. These issues are increasingly more important as Arizona's population continues to grow and the pressures of development gain traction.

AZSFWC requests the following issues be considered in the planning process:

1. **Recognition of valid and responsible forms of outdoor recreation** on public lands, including hunting, angling, shooting, wildlife watching, camping, and OHV use. Keep the public lands open and accessible for outdoor recreation unless there are scientific reasons not to.
2. **Maintain access to wildlife water catchments**, ensuring that all Arizona Game and Fish (AZGFD) water catchments are accessible by vehicle to the public.
3. **Road Maintenance, designate the responsible party** for maintaining the roads. Access is critical to the recreating public, but so is maintaining the roads.
4. **Motorized big game retrieval** allowed up to one mile from a designated roadway except for riparian areas, streams, or other sensitive habitats.

AZSFWC comments on the BLM Middle Gila South Access and Transportation Plan – 4-3-22

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087

5. **Challenged Hunter Access/Mobility Permits (CHAMPS) recognition** allowing holders to retrieve legally taken big game animals within a specified distance.
6. **Maintaining dispersed camping opportunities** up to 300 feet from designated routes and in previously disturbed campsites.
7. **Consistency in signing and regulations** across the planning area. Physically mark roads and trails that are subject to closure and make maps available for the public, so the road status is clearly defined.

This planning area presents a number of challenges, but also has some opportunities for the BLM to enhance access for recreational activities as well as wildlife management. AZSFWC supports several areas identified by AZGFD where we would ask you to take a hard look at opening or enhancing access for both the public and AZGFD. (AZGFD recommendations attached for reference). They include:

Mescal Mountains

In Game Management Unit (GMU) 24A, AZGFD is requesting the establishment of a new public access point for Catchment #4. This would allow maintenance and/or water hauling, as well as ensure continued access for AZGFD management activities, hunting and other outdoor recreation as noted in their comments.

Also, in GMU 24A, AZGFD is requesting public access off Highway 77 to the Mescal Mountain Catchments Road. This road is also important for management activities including facility maintenance and/or water hauling.

Needles Eye Wilderness

In GMU 24A, for all practical purposes the Needle's Eye Wilderness area remains inaccessible to the recreating public. Private land, State Trust land and inaccessible BLM land along Highway 77 to the south and west effectively keeps the public from this wilderness area. Access from the north, east and southeast across the San Carlos Reservation not only requires permits, but would add untold hours to any venture to the area. Candidly this is a head scratcher, when with some creative effort along Highway 77 a more reasonable and public friendly access would sure seem to make sense! AZSFWC would request the BLM explore a western access approach further and work to provide motorized public access to this wilderness area.

West side of the Galiuro Mountains along Tom Rhodes Ranch Road

In GMU 32, private land access is restricted along the Tom Rhodes Ranch bypass around Magma Copper land at River Road Access. The lack of access prohibits vehicles and hunting access to 20,000 acres of State Trust Land and 10,000 acres of Forest Service land in the Galiuro Mountains. There is an AZGFD water catchment located just south of Tom Rhodes Ranch Road which requires access for management activities such as water hauling and maintenance too.

AZSFWC comments on the BLM Middle Gila South Access and Transportation Plan – 4-3-22

AZSFWC concurs with AZGFD in their recommendation that the BLM identify and pursue potential acquisition of rights of way (ROW) or easements to provide for long-term public access and AZGFD management activities. If this solution isn't an option, we concur with the request to identify an alternative access route across BLM lands within the TMP including the potential of a one-mile alternative route on BLM land.

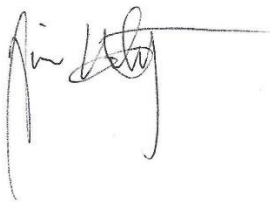
Cat Hills area South of the East Florence-Kelvin Highway

In GMU 37B, referencing AZGFD's notation in Figure 17, we ask that those routes remain open and/or improved. Lack of private land access precludes public vehicular access to approximately 8,000 acres of BLM land around the Cat Hills. Access opportunities also exist to the southwest of the Cat Hills for AZGFD management activities, hunting and outdoor recreation. The addition of a new gate and improvements to an existing 0.60 mile two-tract pipeline road could connect access to an existing road northeast of the Cat Hills, providing additional public and AZGFD access to the area.

AZSFWC and our 20 member groups noted in the following attachment appreciate the partnership between the BLM and the AZGFD when it comes to outdoor recreation, access issues and of course wildlife management in Arizona.

Referencing The John D. Dingell Jr. Act of 2019, we view this planning effort as an opportunity to meet the Congressional intent of ensuring and expanding opportunities for increased access for hunting, fishing, and outdoor recreation in coordination with AZGFD and the public as well. We encourage this dialog to continue through the planning process, conserving what exists and finding opportunities where warranted across this 212,000+ acre planning area.

Thank you!

A handwritten signature in black ink, appearing to read 'Jim Unmacht', with a long horizontal line extending to the right.

Jim Unmacht
Executive Director



**AZSFWC Member Organizations Supporting
Comments on Middle Gila South TMP**

Anglers United
AZ Antelope Foundation
AZ Chapter National Wild Turkey Federation
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Flycasters
AZ Houndsmen's Association
AZ Outdoor Adventures
AZ Outdoor Sports
AZ Predator Callers
Christian Hunters of America
Conservation First USA
Diablo Trust
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
Trust for Public Land
Valley of the Sun Quail Forever
Yuma Valley Rod and Gun Club

Middle Gila South
Access and Transportation Management Plan (TMP)
Public Land Issues and AZGFD Recommendations
April 3, 2023

This document outlines a set of specific public land concerns and challenges identified within the BLM's Middle Gila South Access and Transportation Management Planning area related to public access, and provides recommendations and proposed solutions for improved access. The Department appreciates the opportunity to provide input into the TMP and thanks BLM for considering the Department's recommendations.

General Recommendations:

1. **Maintain Public Vehicular Access to all AZGFD Wildlife Water Catchments:** The Department requests BLM provide motorized public access to all AZGFD water catchments for hunting and other outdoor recreation activities, as well as for Department personnel to continue Department management activities such as water hauling and maintenance of wildlife water developments.
2. **Significant public land access routes.** In several areas within the Middle Gila South planning unit, public lands are accessed by existing routes across non-BLM land that provide the only access. The Department recommends that the routes that provide access to BLM lands through Arizona State Land Department (ASLD), private, and tribal lands be identified in the TMP, and that BLM identify potential acquisition of rights of way (ROW) or easements within these routes to provide for long-term public access. If acquisition of a ROW or easement is not possible, the Department requests the identification of an alternative access route that avoids crossing non-BLM land in the TMP.
3. **Road Maintenance.** AZGFD understands that BLM will develop maintenance guidelines. The Department recommends that the TMP include an evaluation of road maintenance of open routes as part of the proposed action.
4. **Legal Dispersed Camping:** The Department requests the BLM adopt a 300-foot width for all dispersed camping corridors to improve the safety and quality of the camping experience, maintain consistency with other federal land management agencies, and provide adequate and well distributed camping opportunities across the Middle Gila South Travel Management Area. The Department also recommends prohibiting establishment of camping areas within ¼ mile of wildlife water catchments.
5. **Illegal/Unmanaged Long term Camping:** The Department recognizes the challenges BLM faces associated with illegal, unmanaged long term camping, as well as associated concerns with trash and proliferation of trails, in some areas such as along Park Link Drive and Cattle Tank Road in GMU37A. The Department recommends a comprehensive

strategy that maintains access for responsible legal camping, while addressing the concerns associated with illegal long term camping by identifying necessary resources for effective enforcement. The Department requests the BLM fully consider all strategies that retain legal dispersed camping prior to considering closure of these areas, and potentially, relocating the concerns.

Access Needs specific to Department Game Management Units (GMUs):

GMU 24A:

6. GMU 24A: Needle's Eye Wilderness AZGFD and BLM discussed access on January 4, 2023, at which time BLM explained access is available across the San Carlos Reservation from the north, east and south, on existing Tribal Roads, but requires permits. BLM further explained it will maintain access on the east side for maintenance of BLM facilities. The Department requests the BLM provide or identify reasonable, legal motorized public access across BLM land to the west of Needle's Eye Wilderness to facilitate access to the wilderness area through BLM land.
7. GMU 24A: O-Carrol Canyon (Gila River) area to Apache Spring The Department requests continuance of access into 24A for bighorn sheep, deer, javelina hunters and recreationists. Based on discussions with BLM on January 4, 2023, the Department understood that the BLM intended to maintain public access. See Figure 1.

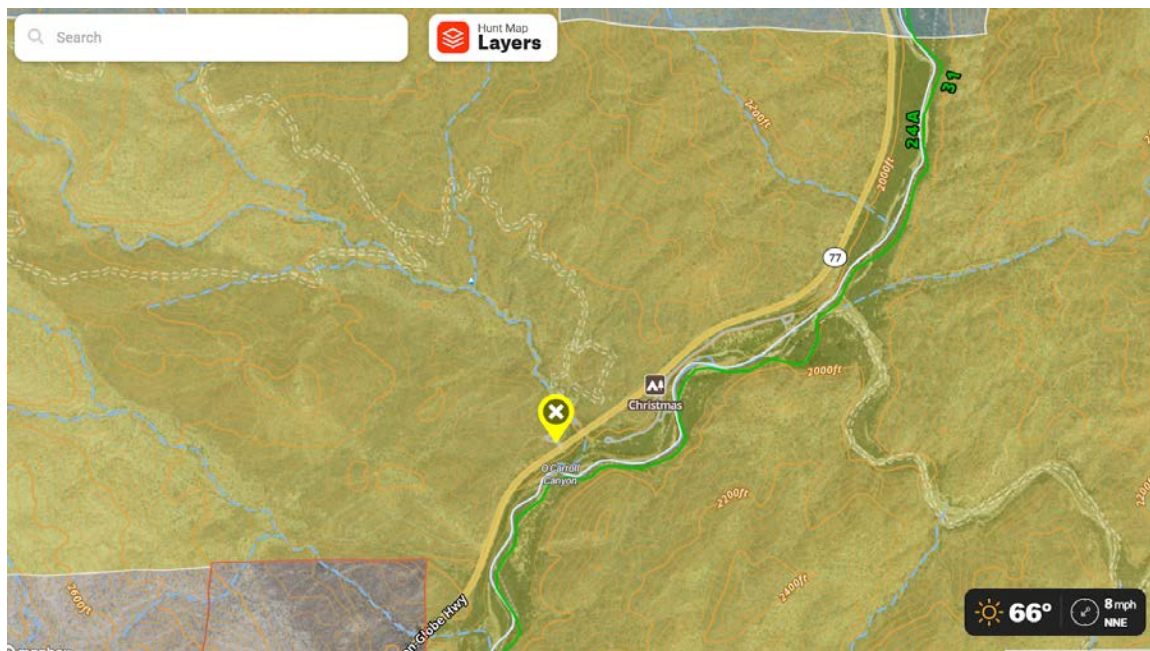


Figure 1. GMU 24A. O-Carrol Canyon to Apache Spring.

8. GMU 24A Mescal Mountain Catchments Road The Department requests BLM include public access to Mescal Mountain Catchments Road on Hwy 77. This road is also important for Department management activities such as facility maintenance and/or

water hauling. Based on discussion between the Department and BLM on January 4, 2023, the Department understands BLM intends to maintain public access. See Figure 2.

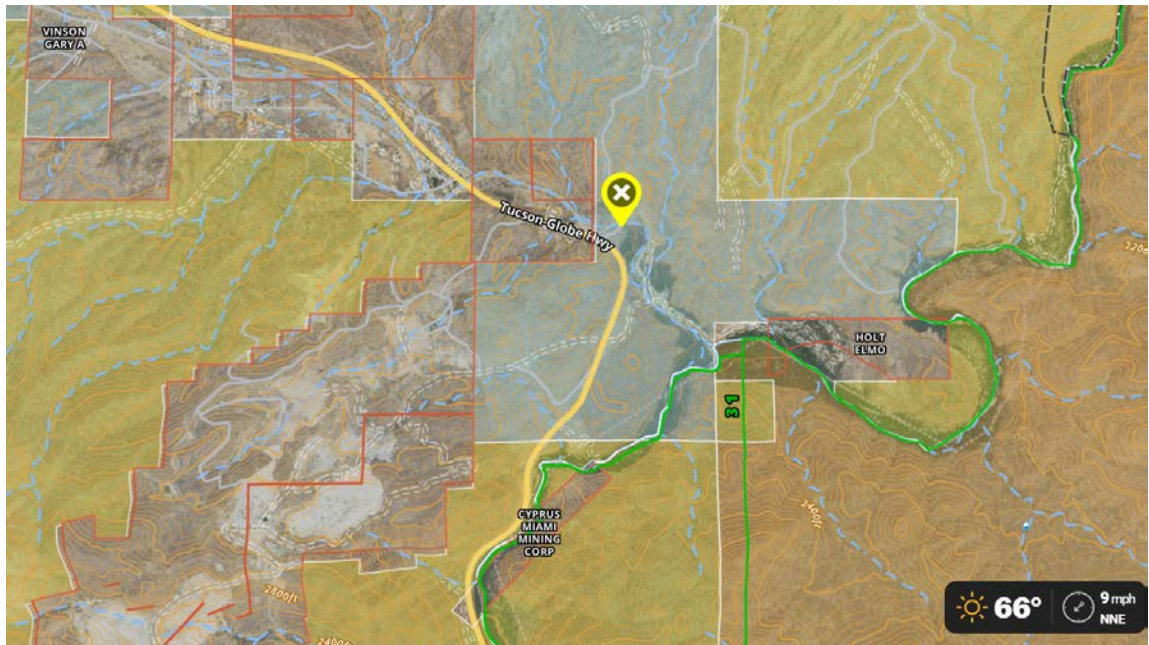


Figure 2. GMU 24A. Route to Mescal Mountain water catchments.

9. GMU 24A: Mescal Mountain #4 Catchment The Department requests BLM establish a new public access point on BLM land for the Mescal Mountain #4 Catchment to ensure continued access for Department management activities including maintenance and/or water hauling, as well as public access for hunting and other outdoor recreation. Figures 3 and 4 provide options to consider for access across BLM lands that avoid potential private land access concerns.

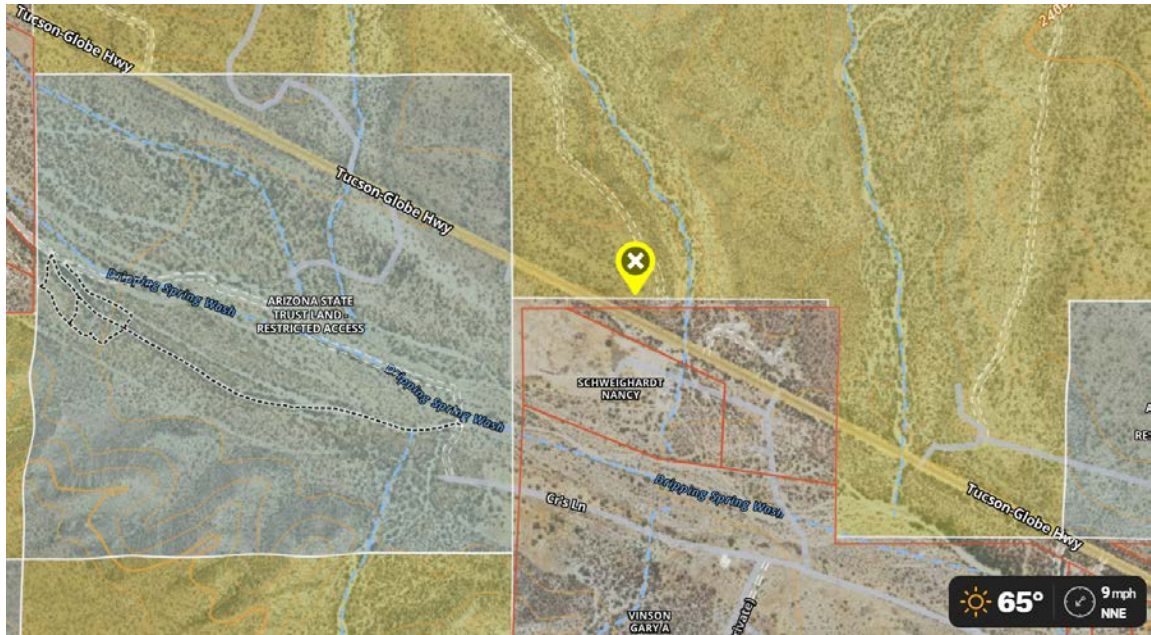


Figure 3. GMU 24A. Proposed alternative route for Mescal Mountain water catchment #4 would provide access directly through BLM land from an access point on the highway northwest of the current access point shown in Figure 4.

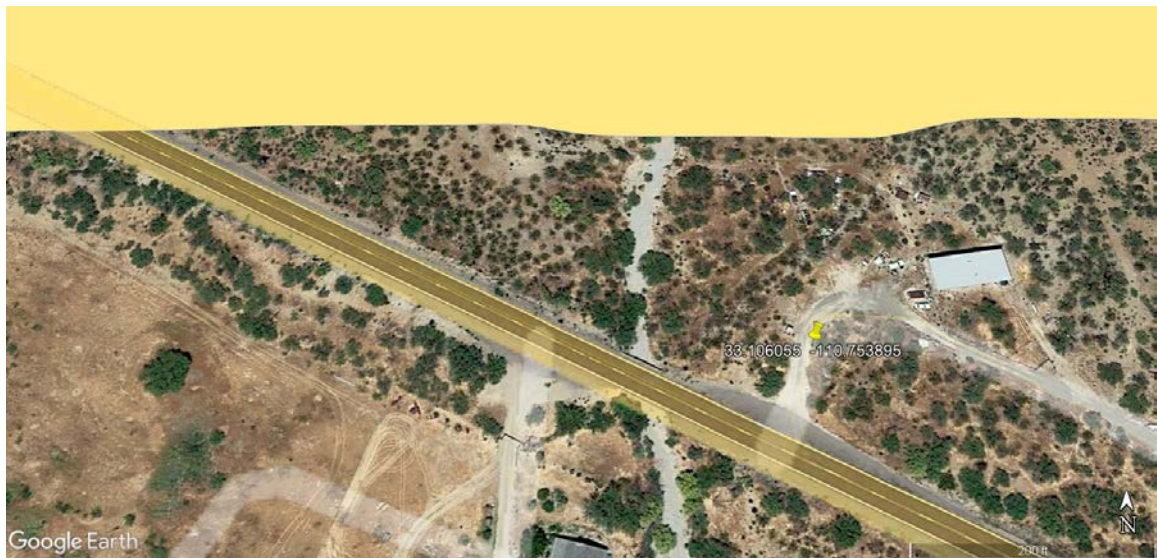


Figure 4. GMU 24A. Existing access to Mescal Mountain water catchment #4 is through private property. See yellow pin.

10. GMU 24A: Keyson and Schneider Canyon The Department requests BLM secure public access to the Keyson and Schneider Canyon area. See Figure 5. The bottom pin at 33.01126, -110.82072 is currently open. Additionally, the Department requests routes on BLM remain open to allow public vehicular and Department access within the Keyson and Schneider Canyon areas.

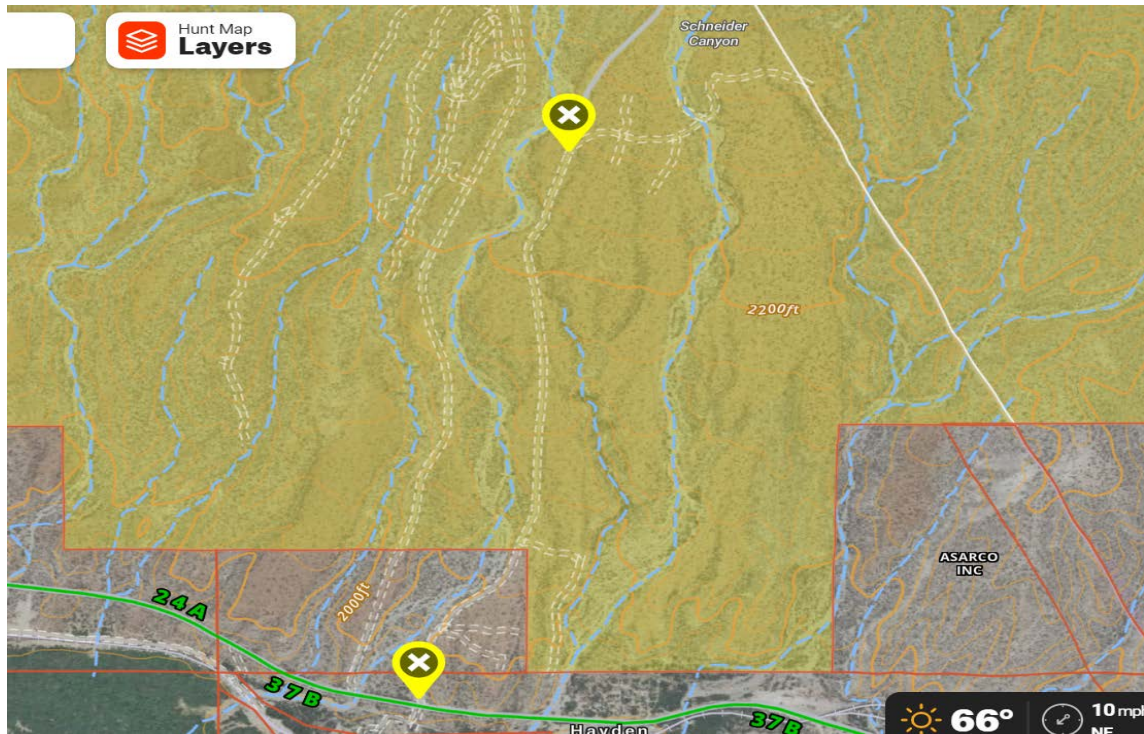


Figure 5. GMU 24A. Access route to Keyson and Shneider Canyon area.

11. GMU 24A: SR 177 The Department requests continued access to ASLD land through points off of SR 177 in Unit 24A. The western point is locked, but the easternmost point is open. It is the Department's understanding based on discussions with the BLM on January 4, 2023, that BLM has agreed to look at the routes and check the connection with the road at the southeasternmost access marked on the map. See Figure 6.

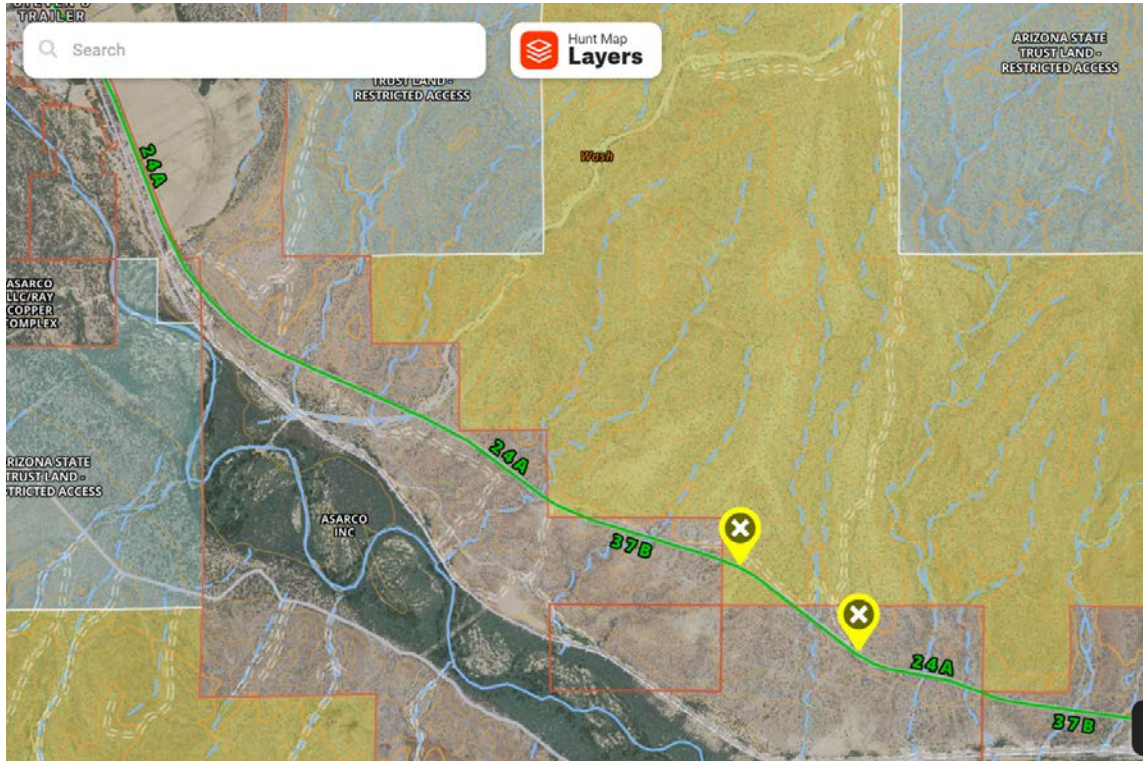


Figure 6. GMU 24A. Access to State Trust Land off of SR 177.

12. GMU 24A: 7B (Resolution Land Exchange) The Department recommends considering public access needs within the 7B property on the Lower San Pedro River at Mammoth.
13. GMU 24A: Tam O'Shanter Peak Area The Department requests continued public access on BLM lands for OHVs. The existing access point at 33.01126, -110.82072 is open and the Department requests continued access at this location.

14. GMU 24A: Steamboat Mountain Area The Department requests continued public and Department access of loop routes in the Steamboat Mountain area. See Figure 7.

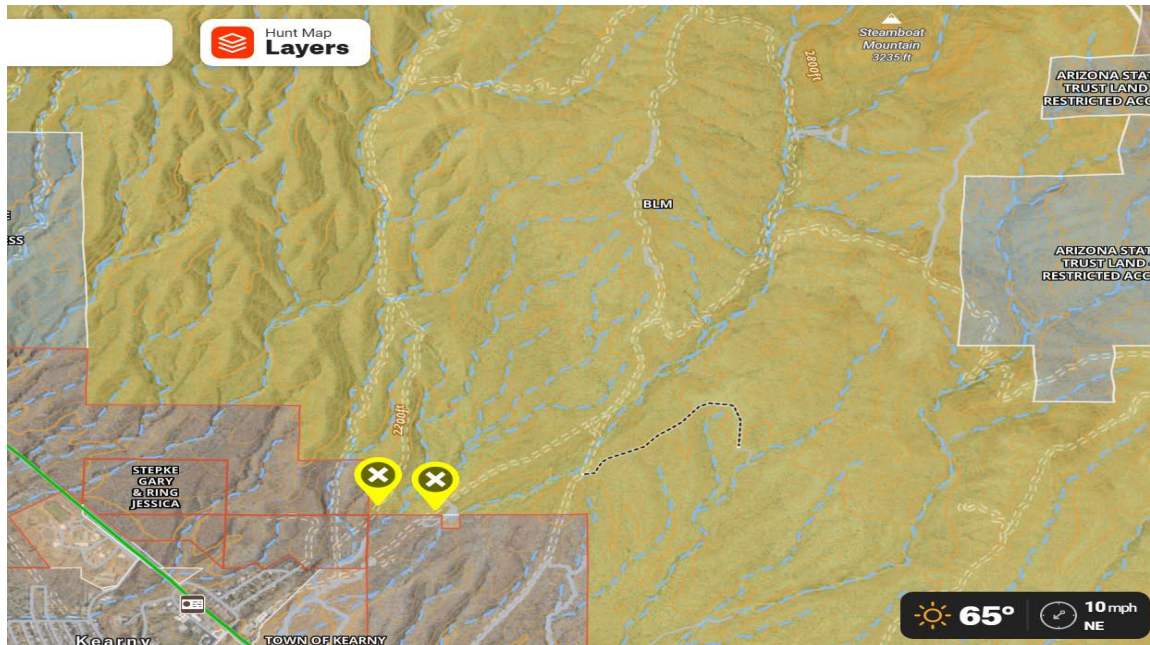


Figure 7. GMU 24A. Steamboat Mountain access.

15. GMU 24A: Kane Spring The Department requests continued access on North Ray Road off SR 177 for access to Kane Spring. It is the Department's understanding based on discussion with the BLM on January 4, 2023, that BLM would pursue legal access and access would be maintained for OHV recreation. See Figure 8.

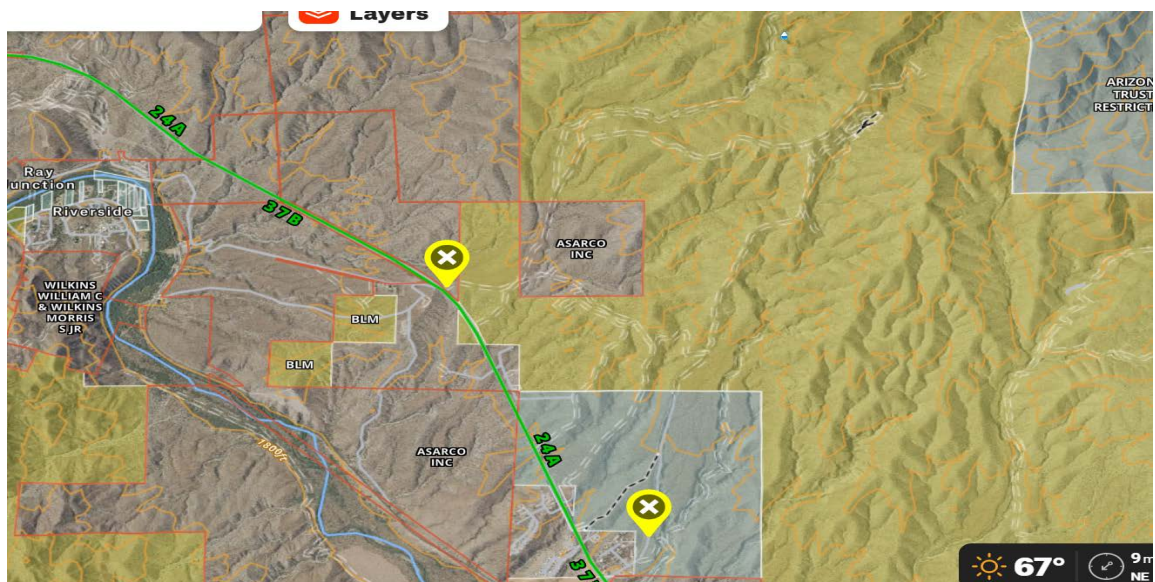


Figure 8. GMU 24A. North Ray Road access to Kane Spring.

GMU 32:

16. GMU 32: Tom Rhodes Ranch bypass around Magma Copper land at River Road Access is not provided along Tom Rhodes Ranch Road due to private land access restrictions. Lack of access limits or prohibits vehicular access to hunting opportunities to 20,000 acres of ASLD land and 10,000 acres of US Forest Service (USFS) land, including portions of the Galiuro Mountains. Additionally, there is an AZGFD water catchment located on ASLD lands beyond BLM managed lands. The Department recommends that BLM identify/pursue potential acquisition of rights of way (ROW) or easements across the private land parcel to provide for long-term public access. If acquisition of a ROW or easement is not possible, the Department requests the identification of an alternative access route across BLM lands within the TMP incorporating OHV staging and dispersed camping along these routes.

Figures 9 and 10 below, identify alternatives/options to secure legal access to this area.

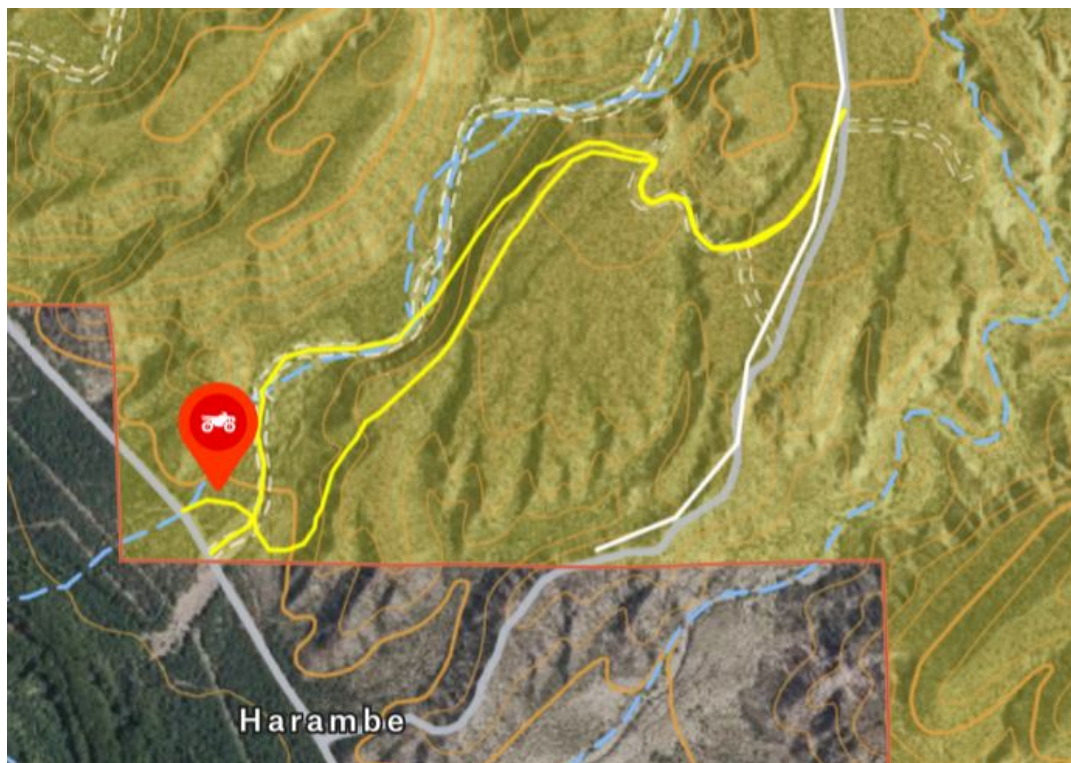


Figure 9. GMU 32. Suggested routes across BLM land in yellow and possible OHV staging area.

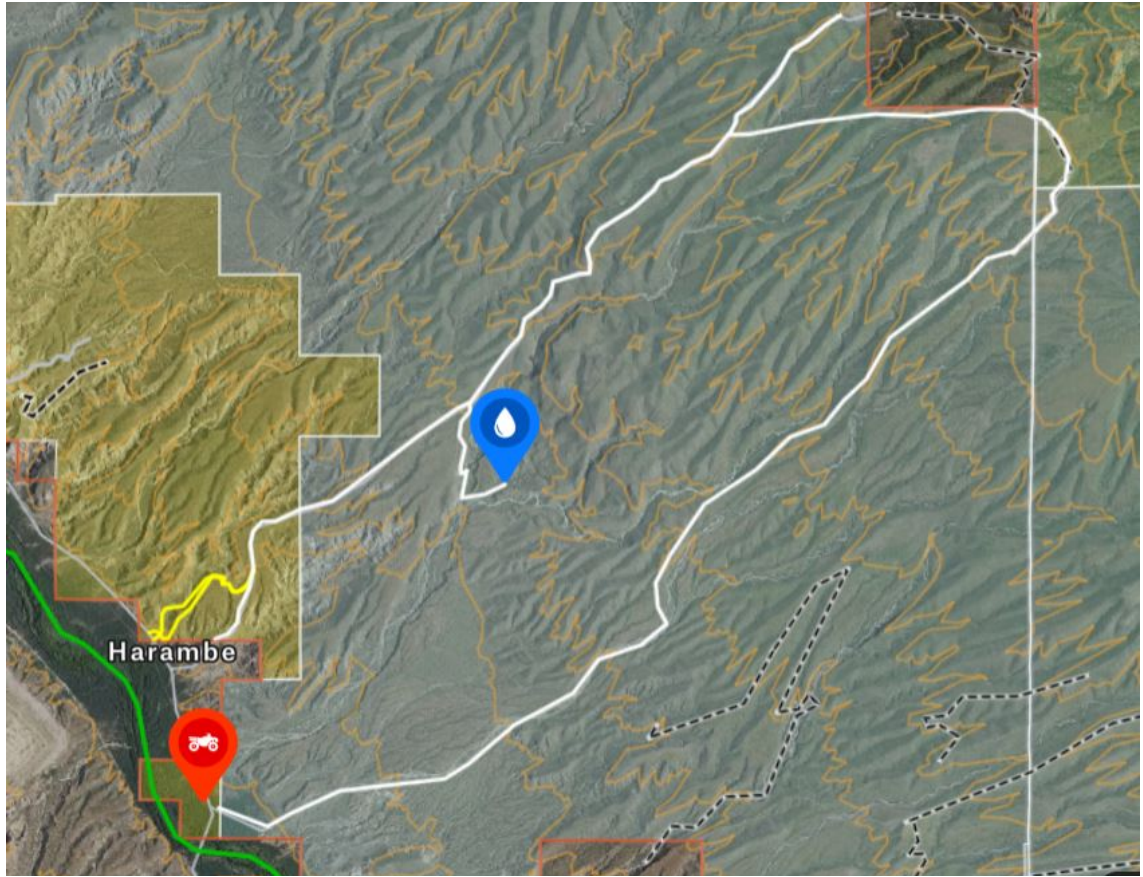


Figure 10. GMU 32. Suggested route (yellow) for access to the Department's water catchment (blue), recommended OHV staging area (red).

17. GMU 32: YLE Ranch Road gate between BLM and ASLD Lands A locked gate between BLM and ASLD land blocks public access to KE-70 federal easements on ASLD land that would provide access to the Galiuro Mountains. The Department requests that BLM add an OHV staging area and allow for dispersed camping no closer than $\frac{1}{4}$ mile from the YLE livestock water. Please see figure 11.

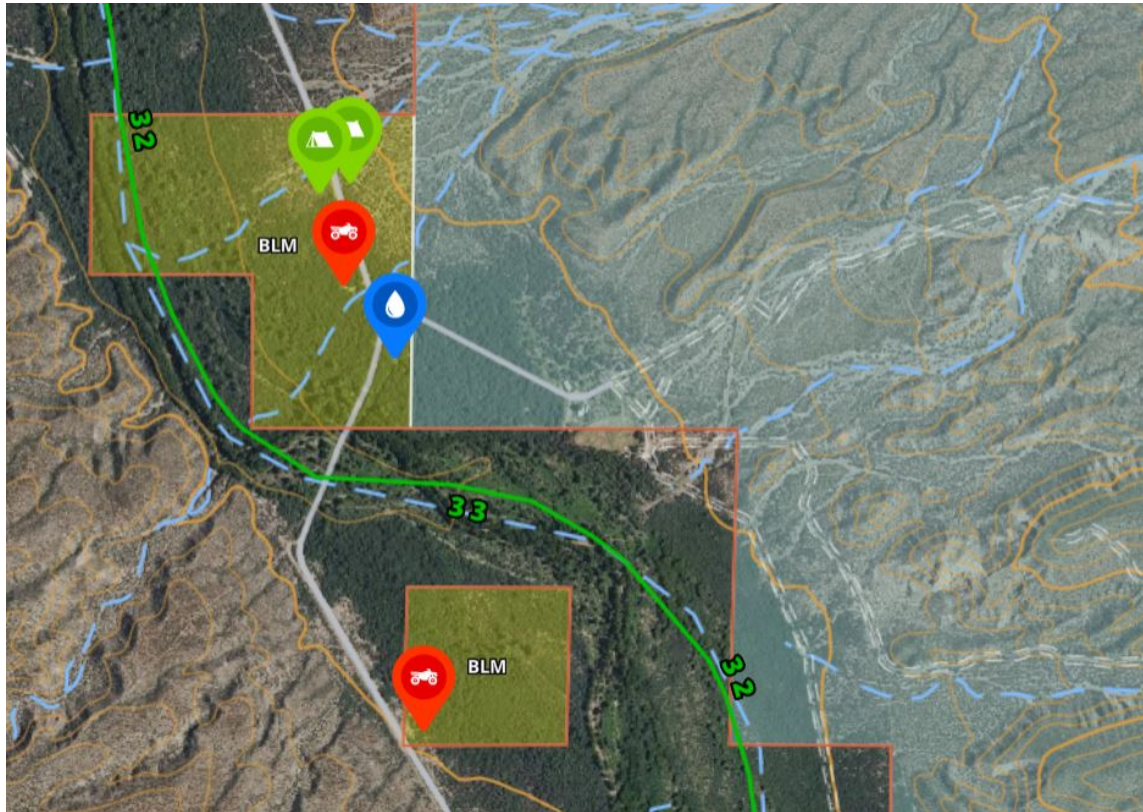


Figure 11. GMU 32. YLE Ranch Road. Suggested OHV staging (red) and dispersed camping areas (green). YLE livestock water in blue.

18. GMU 32/33 Glavin Ranch Road The Department requests that BLM consider acquiring access through private to establish legal vehicular access to BLM, ASLD land, and USFS land. See Figure 12.

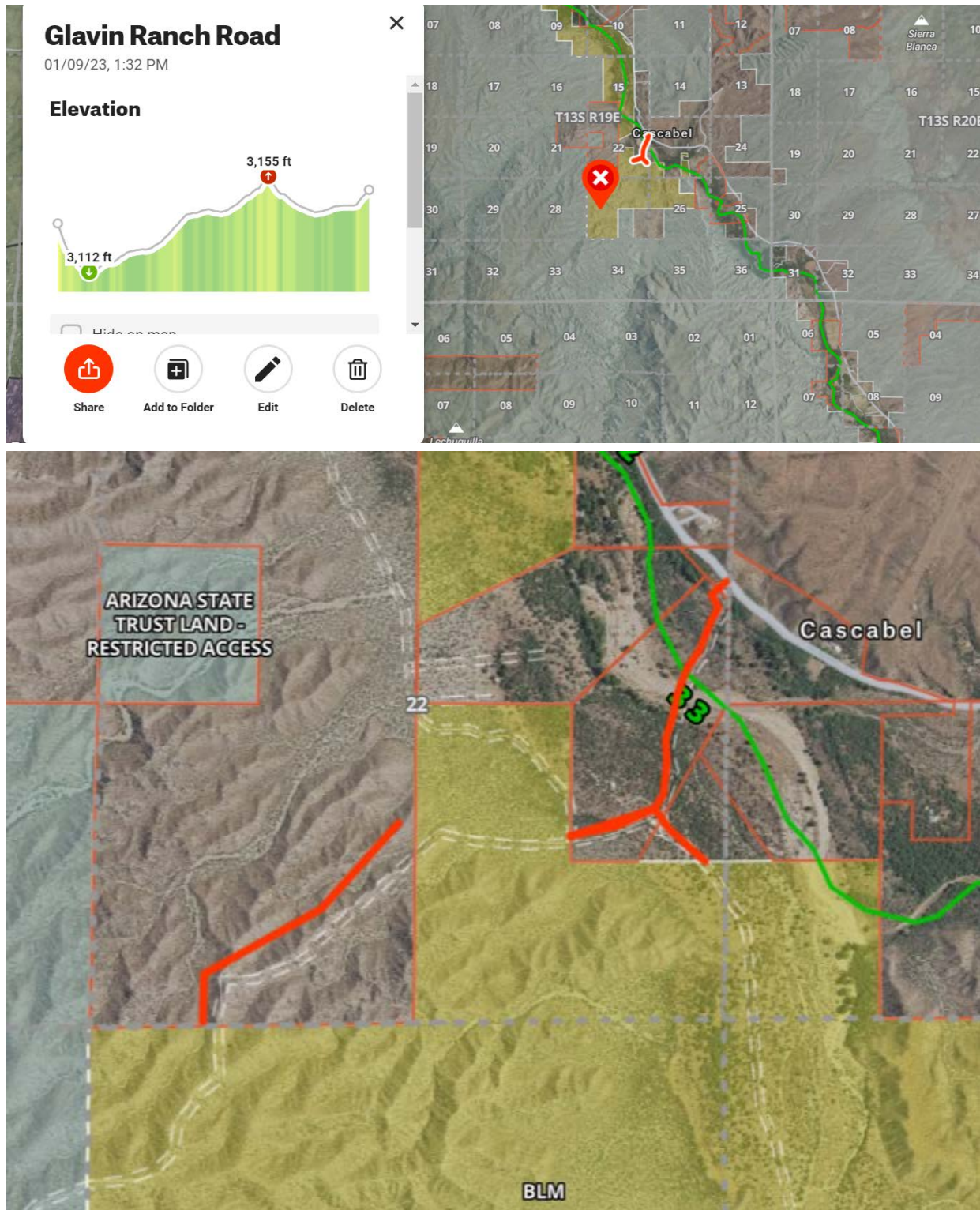


Figure 12. GMU 32/33. Suggested Glavin Ranch Road access route.

GMU 37A:

19. GMU 37A Catchment #689 Catchment #689 is located at 32.69585, -111.38158 in the southeast portion of BLM land within the Picacho Mountains. The Department requests access be provided and maintained to the AZGFD water catchment for both hunter access and Department maintenance of the catchment. It is the Department's understanding based on discussions between AZGFD and BLM on January 4, 2023 that BLM will allow access. See Figure 13.

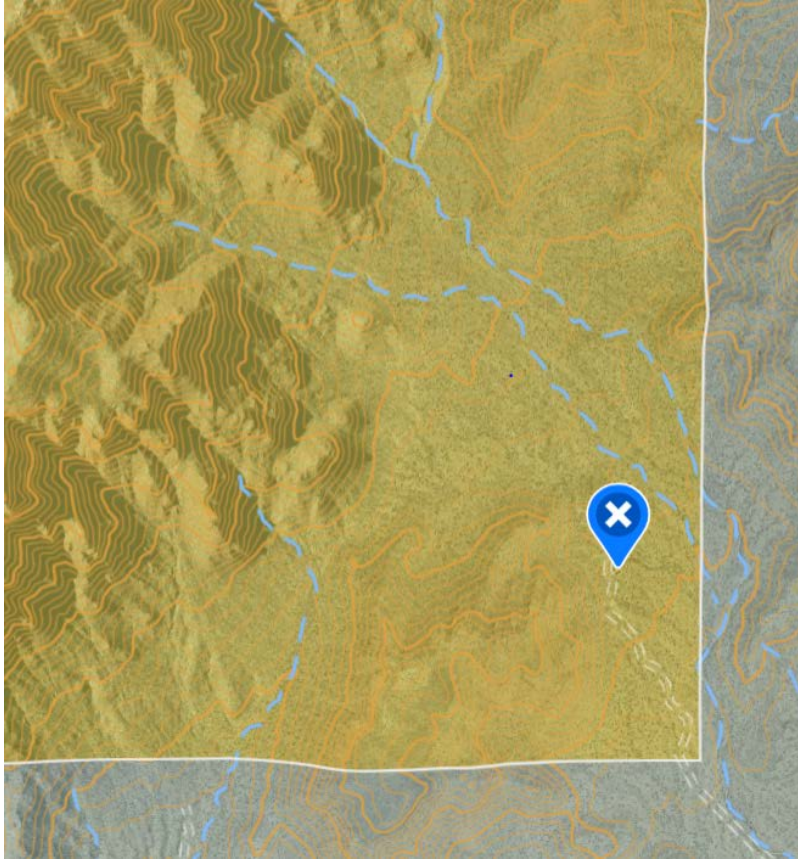


Figure 13. GMU 37A. Access route to AZGFD Catchment #689.

20. GMU 37A North Start Road The Department requests continued public access through the Picacho Mountains on North Start Road. North Start Road provides reasonable public access from Eloy to the east side of the mountain range without having to drive around the entire mountain. North Start Road is also one of the few places where the public can cross the Central Arizona Project canal (location 32.82193, -111.32906). See Figure 14.

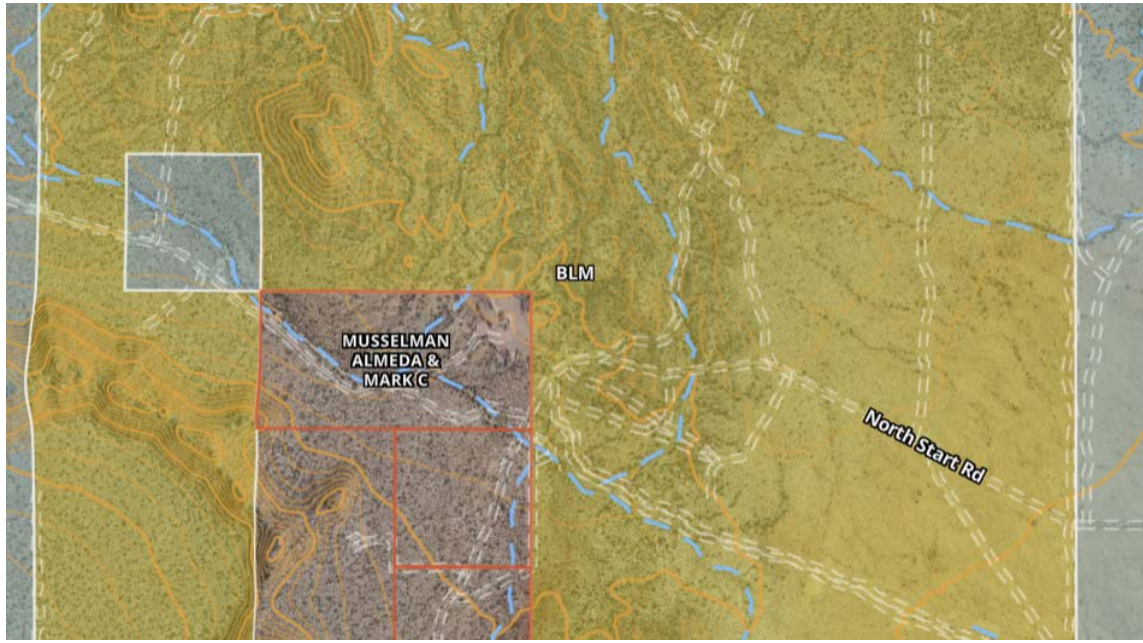


Figure 14. GMU 37A. Picacho Mountains access via North Start Road.

21. GMU 37A Bogart Wash The Department recommends a route inventory be developed in the Bogart Wash (Huerfano Hills) area east of Newman Peak and west of Durham Hills. Additionally, the Department recommends a centralized entrance and exit point be identified and public access routes clearly identified. Location is 32.72477, -111.21386. It is the Department's understanding from discussion with the BLM on January 4, 2023 that BLM will evaluate routes and route density in the area. See Figure 15.



Figure 15. GMU 37A. Bogart Wash/Huerfano Hills gridwork of roads.

22. GMU 37A Desert Peak Area: The Department requests that public access be maintained to Desert Peak south of Park Links Drive. This area is important for public access for recreational shooting and other outdoor recreation, and is one of the few areas surrounding Tucson that can provide this opportunity. The Department also recommends identification of road maintenance needs and planning for this area. See Figure 16.



Figure 16. GMU 37A. Access to Desert Peak.

23. GMU 37A Deep Well Ranch Closure Petition. This is a five-year closure that effectively closes E Brady Wash Rd to the public. The Department requests that alternative routes remain open for public vehicular access in this area.

GMU 37B:

24. GMU 37B Cat Hills The Department requests access routes depicted in Figure 17 remain open and/or improved. Lack of private land access precludes public vehicular access to approximately 8,000 acres of BLM land around the Cat Hills, south of the Florence-Kelvin Highway. Opportunities exist to provide access to the southwest of Cat Hills for Department management activities as well as outdoor recreation including hunters. Additionally, the addition of a new gate and improvements to an existing 0.60 mile two-tract pipeline road could connect access to an existing road northeast of the Cat Hills, providing additional public and Department access to the area.

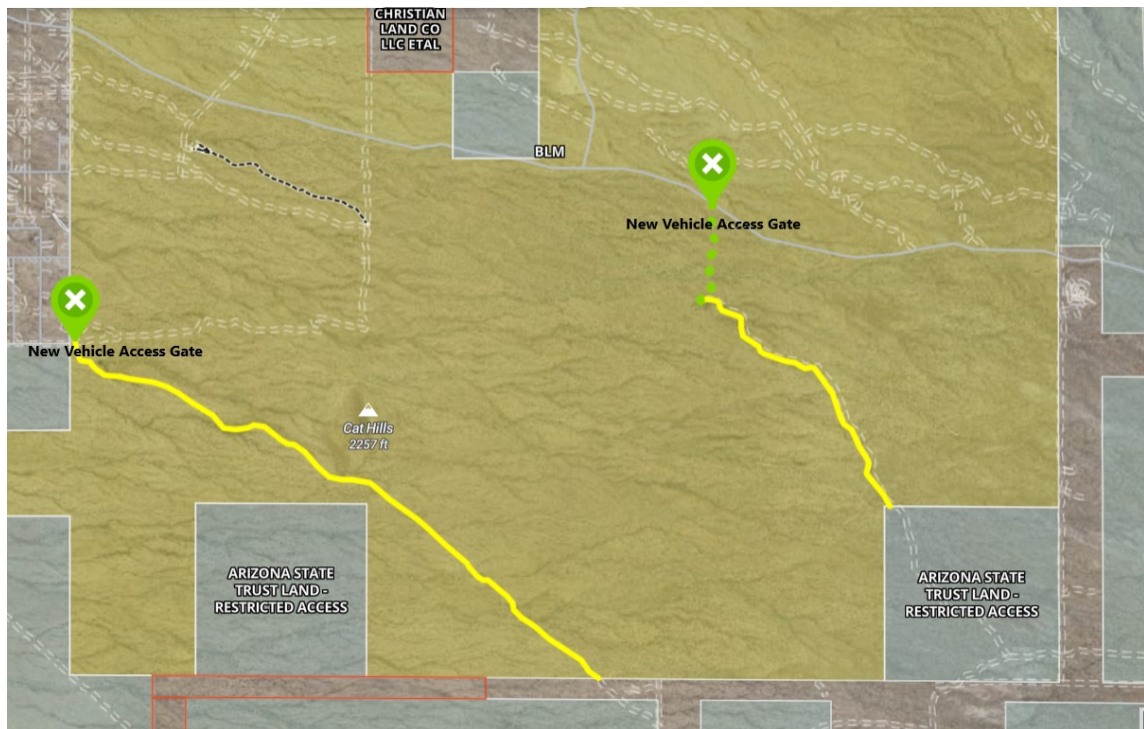


Figure 17. GMU 37B. Cat Hills recommended access routes and locations of vehicle access gates.

25. GMU 37B 3C Ranch Area Private land access concerns have resulted in a loss of public vehicle access to BLM land and a Department wildlife water catchment on adjacent Arizona State Trust Lands. The Department requests BLM identify routes for legal access across BLM land to the ASLD property. As an example, BLM could identify and create an access road from Freeman Road on BLM land to provide public access to ASLD lands, which secures access for Department management activities as well as public recreational access for hunting, camping etc. See Figure 18 for the two recommended alternate routes.



Figure 18. Proposed alternate access routes in yellow, water catchment in blue, and locked gate in red.

26. GMU 37B Camino Rio The Department requests BLM consider recreational access needs to BLM land along Camino Rio south of Dudleyville to Putnam Wash to provide for outdoor public recreation such as hunting, camping, and for Department management activities.