



August 31, 2023

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Submitted via email: [middlegilasouth-tmp@blm.gov](mailto:middlegilasouth-tmp@blm.gov)

**RE: Middle Gila South Access and Transportation Management Plan (TMP) and Draft Environmental Assessment (EA)**

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to provide input for the TMP and EA.

AZSFWC is the leading 501c-3 non-profit 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 consists of 39 member, affiliate, and associate groups that reach across the spectrum of hunting, angling, shooting, outdoor recreation, and businesses from across Arizona. Our member groups represent well over 28,500 people from Arizona.

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 supports the approach outlined by the Proposed Action in Alternative C. We believe this alternative best addresses both the wildlife resource conservation needs, as well as the public safety component. This alternative would provide for both motorized and non-motorized user access, feasible and efficient trail connectivity for different users, access to current levels of dispersed camping and outdoor recreation, reasonable and effective enforceability, and administrative and jurisdictional needs.

However, we also have some additional requests we would like you to reconsider and address.

1. **Designate the responsible party for Road Maintenance.** Access is critical to the recreating public, but so is maintaining the roads.
2. **Be consistent in signing and regulations across the planning area.** Reference Section 4.2.3 Sign Types and Design. Physically mark roads and trails that are subject to closure and make maps available for the public, so the road status is clearly defined.
3. **Reconsider motorized big game retrieval (MBGR) in consultation with the AZ Game and Fish Department (AZGFD).** Reference Section 2.7 Alternatives Considered but Eliminated from Further Analysis. AZSFWC would only advocate for MBGR in areas where resources and sensitive habitats would **not** be jeopardized.

AZSFWC comments on the BLM Middle Gila South Access and TMP Draft EA – 8-31-23

4. **Recognize Challenged Hunter Access/Mobility Permits (CHAMPS)**, as provided for in Commission Rule R12-4-217. Allow CHAMPS permit holders to legally retrieve big game animals within a specified distance within routes designated as open.
5. **Revisit the dispersed camping guidelines**. Allow camping up to 300 feet from designated routes and in previously disturbed campsites. You make the argument to allow this in Section 3.2. Air Quality, including Green House Gasses. Why confine recreational campers close to the road and subject them to dust and pollution?
6. **Provide reasonable public access to the Needles Eye Wilderness Area**. Referencing Section 1.10 Public Land Access Issue Areas, and The John D. Dingell, Jr. Conservation, Management and Recreation Act of 2019 (Dingell Act), clearly this is an opportunity to meet the Congressional intent of ensuring, expanding, and increasing access for the recreating public. You conclude by saying, "The Dingell Act Priority Access List for BLM Arizona includes areas of public land areas greater than 640 acres in size identified by the public as being legally inaccessible or with access that is significantly restricted."

Referencing Section 2.2.13 Future Improvements, we noted the statement, "The TMP considers routes that provide access on public lands, recreational opportunity areas (e.g., hunting, fishing, camping), and allows for future improvements (e.g., staging areas, motorized, non-motorized, non-mechanized routes)." Further, "Easements may also be pursued with private property owners, as well as in cooperation with the AZGFD through their access program. This is in accordance with Secretarial Order (S.O.) 3447."

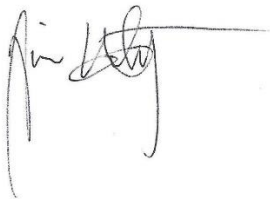
Then in Section 2.5 Alternative C (Balanced – Proposed Action), "New routes would be constructed to bypass private locked gates blocking public access route networks, or for improved connectivity."

The Needles Eye Wilderness is approximately 9,201 acres as noted in Section 3.14.1.1 Needles Eye Wilderness Area. Arguably, the access is complicated if not significantly restricted by private and state landowners.

In Section 3.14.1.3 Wilderness Trends, you state, "Public interest in Wilderness areas and Wilderness preservation is expected to continue. Public use in the Needle's Eye Wilderness is expected to continue at low levels due to remoteness and difficult access."

AZSFWC's scoping comments in our April 3, 2023 letter stated that for all practical purposes this 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 not only observing this wilderness area, but from recreating on it. 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. AZSFWC urges the BLM to develop a western access route to the Needles Eye Wilderness from Highway 77, giving the public an opportunity to explore and appreciate this wilderness area.

AZSFWC and the attached list of 21 member organizations thank you for considering our input!



Jim Unmacht  
Executive Director



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

Anglers United  
AZ Antelope Foundation  
AZ Chapter of National Wild Turkey Federation  
AZ Chapter of Safari Club International  
AZ Council of Trout Unlimited  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Flycasters Club  
AZ Houndsmen Association  
AZ Outdoor Sports  
AZ Predator Callers  
Christian Hunters of America  
Conservation First USA  
Diablo Trust  
Fly Fishers Arizona  
Friends of Buenos Aires National Wildlife Refuge  
Southern AZ Quail Forever  
Outdoor Experience 4 All  
Mule Deer Foundation  
Trust for Public Land  
Valley of the Sun Quail Forever