

**Arizona Native Plant Society • Arizona Trail Association • Arizona Mining Reform Coalition • Chispa AZ • Defenders of Wildlife • Friends of Ironwood Forest • Friends of the San Pedro River • Friends of the Sonoran Desert • Grand Canyon Trust • Natural Allies • Save the Scenic Santa Ritas • Sierra Club • Western Watersheds Project • The Wilderness Society • White Mountain Conservation League • Wild Arizona • Wilderness Watch • WildEarth Guardians • Wildlands Network**

September 12, 2022

Ray Suazo, Arizona State Director  
Bureau of Land Management, Arizona State Office  
One North Central Ave., Suite 800  
Phoenix, AZ 85004-4427

Dear Director Suazo:

We are writing to request that you use your authority under Section 202 of the Federal Land Policy and Management Act (FLPMA) to help meet President Biden's "30x30" goal by protecting Arizona lands possessing wilderness characteristics. Of the conservation tools available to the BLM, none provide the durability and effectiveness of FLPMA § 202 Wilderness Study Area (WSA) designation.

For lands not eligible for consideration as WSA's but possessing outstanding natural and cultural values, there is no better tool than designation as Areas of Critical Environmental Concern (ACEC). A renewed focus on these designations can provide the natural environment and our human communities with the resilience needed to face an uncertain future.

**The BLM has the authority needed to protect Arizona's most valuable wildlands.**

The BLM currently manages nearly 650,000 acres in Arizona to protect wilderness characteristics in accord with existing management plans. The BLM has further determined that almost 1,608,000 acres in Arizona possess the wilderness characteristics criteria of size, naturalness, and outstanding solitude and/or outstanding primitive and unconfined recreation. These lands can – and should – be elevated to WSAs to ensure wilderness values are fully protected, and to make major progress towards the Biden Administration's 30x30 goals.

The BLM currently possesses the legal mechanisms to elevate the protected status of wilderness quality lands with exceptional ecological and cultural significance:

- New WSAs can be created through the planning process authorized by Section 202 of FLPMA.<sup>1</sup> Instructions for inventorying and considering Lands with Wilderness Characteristics (LWCs) in the planning process are found in BLM Manuals 6310 and 6320.
- New ACECs can be identified at any time under the authority of Section 201 of FLPMA,<sup>2</sup> and they shall be given priority for designation during land planning processes.<sup>3</sup>

## **Four ways the BLM can protect Arizona's public lands and advance the America the Beautiful initiative.**

### **1. Complete Statewide Plan Amendments for Climate Adaptation and Biodiversity Resilience.**

The BLM's authority to designate new WSAs and ACECs lies within the land use planning process defined in Section 202 of FLPMA. We advise BLM to initiate a statewide amendment process specific to wildlands conservation and to consider a streamlined programmatic NEPA analysis of public and Tribal nominations for LWCs, WSAs, and ACECs. A statewide plan amendment would provide a framework for the Arizona State Office to work with Tribes, other land management agencies, and neighboring states to identify and protect wildlife movement corridors and connectivity areas across jurisdictional lines.

- ✓ Designating WSAs and ACECs makes measurable, science-based progress toward "30x30."

### **2. Revise Outdated Resource Management Plans to Address Today's Pressing Conservation Challenges.**

Management Plans for the sprawling Kingman and Safford Field Office management areas have not been updated in nearly 30 years. The outdated plans must be revised if the BLM is to tackle the convergent climate and biodiversity crises in the context of current socio-economic dynamics.

- ✓ In revised plans, the BLM can provide safeguards for biodiversity, cultural sites and landscapes, riparian areas, and rare desert ecosystems by identifying and protecting lands with wilderness characteristics, designating new WSAs and ACECs.

### **3. Utilize Citizen-Proposed LWCs as a Reference for Inventory, Land Use Planning, and Travel Planning.**

Since 2002, Arizona citizens have conducted innumerable wilderness field surveys, and have presented the BLM with comprehensive documentation of 3.2 million acres of proposed lands with wilderness characteristics across the state, in every field office, and on all NLCS lands. The BLM should embrace these citizen proposals as assets grounded in intensive, field-based data collection that generally meets or exceeds what the BLM is able to accomplish due to funding constraints.

- ✓ As BLM moves to complete travel management planning across Arizona, it is crucial that citizen inventories are utilized to identify core wildland blocks that represent the best remaining opportunities to protect wilderness characteristics.

### **4. Complete LWC Inventory in the Kingman FO and Initiate LWC Inventory in the Safford FO.**

Between 2015 and 2018, the BLM received citizen proposals for LWCs in the Kingman Field Office, encompassing 713,651 acres of wild public lands. Also, the BLM received citizen proposals for 29 LWC units within the Safford Field Office. Following those submissions, the BLM embarked on an agency inventory process for the Kingman Field Office, following the guidance set forth in Manual 6310. The BLM was not able to complete the inventory of the entire field office, but did determine that 31 units of land encompassing 590,566 acres met the criteria for size, naturalness, and outstanding solitude and/or primitive and unconfined recreation. The BLM's evaluations closely matched what was submitted by citizens in prior years, validating the legitimacy and relevancy of the citizen proposals.

- ✓ We strongly urge BLM to allocate resources to complete the unfinished inventory work on the Kingman Field Office, especially since travel management planning has resumed. In addition, we urge BLM to initiate LWC inventory for the Safford Field Office, which has not been inventoried.

### **Wildlands of exceptional significance on Arizona's BLM lands remain unprotected.**

Proliferating off-road vehicle use, recreational shooting, rapidly expanding lithium mining, renewable energy development, new transmission line proposals, and unsustainable agricultural practices threaten some of Arizona's wildest and least fragmented public lands. Here are a few select examples of what's at stake.

- In the Kingman Field Office, the Lower Burro Creek and Aquarius Cliffs citizen-proposed lands with wilderness characteristics are directly – and imminently – threatened by lithium mining.
- In the Yuma Field Office, BLM wildlands connecting the Kofa National Wildlife Refuge to the Eagletail Mountains Wilderness remain vulnerable to development and habitat fragmentation.
- In the Safford Field Office, the BLM is positioned to easily expand protections for lands with wilderness characteristics that are contiguous to the Aravaipa, Santa Teresa, Fishhooks, Peloncillo, and Dos Cabezas Wilderness Areas.

### **Protecting BLM's wildlands in Arizona provides a range of benefits to nature and society.**

*Climate Change Adaptation:* Conservation biologists agree that increasing the extent of natural areas protected from human threats is a crucial climate change adaptation strategy.<sup>4</sup>

*Water Quantity and Quality:* Protecting Arizona's wildlands safeguards watershed function and ensures water quality and quantity are maintained for wildlife and downstream human communities.<sup>5</sup>

*Wildlife Habitat Availability and Connectivity:* The National Fish, Wildlife and Plants Climate Adaptation Strategy states that “we will need well-connected networks of conservation areas to allow for the movement of species in response to climate change.”<sup>6</sup>

*Biodiversity Conservation:* Ecologists have found that protecting wilderness-quality lands cuts in half the risk of extinction for threatened terrestrial species.<sup>7</sup>

*Shared Heritage:* Protecting culturally significant landscapes from industrial development and off-road vehicle use reduces or eliminates myriad threats to important archaeological and historical sites, including places holding particular significance for Indigenous people.

*Vital Communities:* Economists report that entrepreneurs and talented workers choose to live where they have access to protected natural areas, boosting potentials for regional job and income growth.<sup>8</sup>

*Quality of Life:* Protecting Arizona's BLM wildlands would ensure that all Americans have more and easier access to wild spaces for recreation, education, research, spiritual renewal, solitude, and wildlife viewing. Arizonans and visitors want greater opportunities to appreciate the scenic, natural, and cultural legacies embedded in these matchless landscapes.

### **There is significant public support for protecting Arizona's public lands and waters.**

The BLM's role in addressing the climate and extinction crises, providing access to nature for all Americans, and honoring Tribes' ongoing ties to the land cannot be understated. Elected officials from Arizona and across the West wrote to the BLM in the *Mountain Pact letter*, stating that “as the largest

land manager in the nation, the Bureau of Land Management must play a leading role in protecting our public lands for the future.”<sup>9</sup>

The American public wants action to meet current and easily foreseeable challenges. Consider these recent polls:

- In the 2022 State of the Rockies poll, 82% of Arizonans support creating new protected areas on our public lands.<sup>10</sup>
- In the 2021 Arizona We Want report, published by the Center for the Future of Arizona,<sup>11</sup> 92% of Arizonans said it’s important for the state to “preserve and protect its rivers, natural areas and wildlife,” one of the two highest consensus items from the survey. Plus, 82% of Arizonans responded that protecting and expanding open spaces for parks and outdoor recreation was important.
- A 2017 poll directed by the Theodore Roosevelt Conservation Partnership (TRCP) found that 97% of sportsmen feel that protected public lands are important for future generations.<sup>12</sup> The 2022 TRCP poll identified habitat “broken up by development and industry” as the greatest threat to wildlife.<sup>13</sup>

Arizona’s BLM lands are the “connective tissues” linking our landscapes, communities, and heritage. Identifying and protecting core public lands possessing wilderness characteristics and significant cultural and ecological values provides society with tangible, near-term solutions to our most pressing concerns.

We close with a respectful request to meet with you and other State Office leadership to discuss the information and perspective presented above. If we are to avoid the worst outcomes of drought, climate change, growing recreation pressure, and the extinction crisis, we must work together and share resources, experiences, and perspectives. We look forward, especially, to collaborations involving citizen-proposed lands with wilderness characteristics and travel management planning across the state. We will reach out soon to gauge BLM interest in meeting and associated arrangements.

Sincerely,

Mike Quigley, Arizona State Director  
**The Wilderness Society**  
[mike\\_quigley@tws.org](mailto:mike_quigley@tws.org)

Travis Bruner, Conservation Director  
**Grand Canyon Trust**  
[tbruner@grandcanyontrust.org](mailto:tbruner@grandcanyontrust.org)

Kelly Burke, Executive Director  
**Wild Arizona**  
[kelly@wildarizona.org](mailto:kelly@wildarizona.org)

Sandy Bahr, Chapter Director  
**Sierra Club, Grand Canyon Chapter**  
[sandy.bahr@sierraclub.org](mailto:sandy.bahr@sierraclub.org)

Matt Nelson, Executive Director  
**Arizona Trail Association**  
[matthew@aztrail.org](mailto:matthew@aztrail.org)

Bryan Bird, Southwest Director  
**Defenders of Wildlife**  
[BBird@defenders.org](mailto:BBird@defenders.org)

Roger McManus, President  
**Friends of the Sonoran Desert**  
[redwardmcmanus@gmail.com](mailto:redwardmcmanus@gmail.com)

Robert Weissler, Board President  
**Friends of the San Pedro River**  
[fspr@sanpedroriver.org](mailto:fspr@sanpedroriver.org)

Madeleine Carey, Southwest Conservation Manager  
**WildEarth Guardians**  
[mcarey@wildearthguardians.org](mailto:mcarey@wildearthguardians.org)

George Nickas, Executive Director  
**Wilderness Watch**  
[gnickas@wildernesswatch.org](mailto:gnickas@wildernesswatch.org)

Michael Dax, Western Program Director  
**Wildlands Network**  
[michael@wildlandsnetwork.org](mailto:michael@wildlandsnetwork.org)

Roger Featherstone, Director  
**Arizona Mining Reform Coalition**  
[roger@azminingreform.org](mailto:roger@azminingreform.org)

David Hodges, Director  
**Natural Allies**  
[dhodges73@gmail.com](mailto:dhodges73@gmail.com)

Tom Hannagan, Board President  
**Friends of Ironwood Forest**  
[tom@thannagan.com](mailto:tom@thannagan.com)

Doug Ripley, President  
**Arizona Native Plant Society**  
[jdougripley@gmail.com](mailto:jdougripley@gmail.com)

Cyndi Tuell, Arizona and New Mexico Director  
**Western Watersheds Project**  
[cyndi@westernwatersheds.org](mailto:cyndi@westernwatersheds.org)

Gayle Hartmann, President  
**Save the Scenic Santa Ritas**  
[gaylehartmann4@gmail.com](mailto:gaylehartmann4@gmail.com)

Tom Hollender, President  
**White Mountain Conservation League**  
[twollender@gmail.com](mailto:twollender@gmail.com)

## References Cited

---

<sup>1</sup> [The NATIONAL LANDSCAPE CONSERVATION SYSTEM 15-Year Strategy 2010-2025](#)

<sup>2</sup> 43 U.S.C. 1711

<sup>3</sup> 43 U.S.C. 1712

<sup>4</sup> "A Review of Climate-Change Adaptation Strategies for Wildlife Management and Biodiversity Conservation." Published in the journal *Conservation Biology*. March 2009. Available on-line at: <https://conbio.onlinelibrary.wiley.com/doi/10.1111/j.1523-1739.2009.01264.x>

<sup>5</sup> "An Economic Perspective on the Relationship between Wilderness and Water Resources." Published in *Natural Areas Journal*. March 2019. Available on-line at: <https://doi.org/10.3375/043.039.0103>

<sup>6</sup> "National Fish, Wildlife and Plants Climate Adaptation Strategy." An intergovernmental report prepared by the Association of Fish and Wildlife Agencies, Council on Environmental Quality, Great Lakes Indian Fish and Wildlife Commission, National Oceanic and Atmospheric Administration, and U.S. Fish and Wildlife Service. April 2013. Available on-line at: <https://www.federalregister.gov/documents/2013/04/01/2013-07507/national-fish-wildlife-and-plants-climate-adaptation-strategy>

<sup>7</sup> "Wilderness areas halve the extinction risk of terrestrial biodiversity." Published in the journal *Nature*. September 2019. Available on-line at: <https://www.nature.com/articles/s41586-019-1567-7>

<sup>8</sup> "West is Best: How Public Lands in the West Create a Competitive Economic Advantage." A Research paper by Headwaters Economics. November 2012. Available on-line at: [https://headwaterseconomics.org/wp-content/uploads/West\\_Is\\_Best\\_Full\\_Report.pdf](https://headwaterseconomics.org/wp-content/uploads/West_Is_Best_Full_Report.pdf)

<sup>9</sup> <https://www.themountainpact.org/blmletter2022>

<sup>10</sup> <https://www.coloradocollege.edu/other/stateoftherockies/conservationinthewest/2022/2022-poll-results.html>

<sup>11</sup> [https://www.arizonafuture.org/media/unfojhmh/cfa\\_arizona\\_we\\_want\\_the\\_decade\\_ahead\\_digital.pdf](https://www.arizonafuture.org/media/unfojhmh/cfa_arizona_we_want_the_decade_ahead_digital.pdf)

<sup>12</sup> [https://www.trcp.org/wp-content/uploads/2017/06/TRCP-Natl-Sportsmens-Poll\\_Complete.pdf](https://www.trcp.org/wp-content/uploads/2017/06/TRCP-Natl-Sportsmens-Poll_Complete.pdf)

<sup>13</sup> <https://www.trcp.org/wp-content/uploads/2022/08/Poll-results-downloadable.pdf>