



April 11, 2015

Bureau of Land Management
Agua Fria National Monument
ATTN: Casey Addy
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Mr. Addy:

The following comments are submitted in response to your proposed action concerning the Horseshoe and Copper Creek grazing allotments and the related Coordinated Resource Management Plan ("CRMP"). Archaeology Southwest has been an active participant in the CRMP process and we will look forward to our continued participation.

In general, our concerns are related to the proposed extent of livestock grazing on the Monument and the proposed number of range improvements that will facilitate grazing throughout Perry Mesa. All of which has the potential to adversely affect both the individual historic resources within the Agua Fria National Monument ("AFNM") and the Perry Mesa Archaeological District ("PMAD") in its entirety. It is important in this context to emphasize that the Monument was established principally to protect the archaeological resources, both at the individual level and system level. Please note the first paragraph and first sentence of the second paragraph of the Proclamation:

"The windswept, grassy mesas and formidable canyons of Agua Fria National Monument embrace an extraordinary array of scientific and historic resources. The ancient ruins within the monument, with their breathtaking vistas and spectacular petroglyphs, provide a link to the past, offering insights into the lives of the peoples who once inhabited this part of the desert Southwest. The area's architectural features and artifacts are tangible objects that can help researchers reconstruct the human past. Such objects and, more importantly, the spatial relationships among them, provide outstanding opportunities for archeologists to

study the way humans interacted with one another, neighboring groups, and with the environment that sustained them in prehistoric times. The monument contains one of the most significant systems of later prehistoric sites in the American Southwest.” . . .

The purpose for creating the National Monument must remain paramount in any decisions regarding authorized uses on the Monument, including the much expanded grazing use contemplated by the Proposed Action. There has been extensive litigation on this point and the Court's have consistently ruled that the Bureau of Land Management (BLM) has the clear responsibility to protect Monument objects above and beyond other multiple uses. BLM's own guidance IM- 2009-215 explains: **“the designating language – and not FLPMA's multiple use mandate – is the controlling law: ‘A presidential proclamation . . . that designates an area within the National System of Public Lands supercedes conflicting direction by [FLPMA] . . . Specifically, the land use plan and management direction for such designation must comply with the purposes and objectives of the proclamation regardless of any conflicts with the FLPMA's multiple use mandate.’”** It is clear that the Monument's purpose in part is to preserve for future generations the historic resources found within the Monument. This level of protection is clearly intended to go beyond that required of any federal action by the National Historic Preservation Act. It is essential that the proposed action indicate how the new range improvements and the subsequent increase in grazing extent as a result of these improvements will not undermine the purpose of the Monument which is to safeguard all historic resources for future generation.

In addition, much of Perry Mesa and the subject grazing allotments occur within the Perry Mesa Archaeological District, listed on the National Register which requires at a minimum that the Tonto National Forest and the BLM evaluate the direct and indirect adverse effects of any proposed action to historic resources at the site level and at the landscape level as defined by the Perry Mesa Archaeological District, listed on National Register. In particular we are concerned that the activities formulated as part of the grazing system would result in both direct and indirect adverse effects to the historic resources. These adverse effects can occur to individual resources and Perry Mesa cultural landscape itself and the effects are related both to the physical range improvements and the increased cattle grazing activity as

result of the improvements. There is ample literature available that documents the effects of livestock grazing on historic resources which we can make available at your request.

Given the primacy of the archaeological resource in the Monument then any actions must avoid adverse effects to the historic resources, including the Perry Mesa Archaeological District. Mitigation of any kind is not an acceptable resolution of adverse effects within the Monument.

2. The CRMP seeks to establish goals and objectives for various resources including Heritage Resources. In general the goals and objectives for Heritage Resources fall short of those listed for the other resource categories. We anticipate that this will be remedied before issuing a draft CRMP for public review. One objective that was identified in earlier CRMP discussions but seems to have fallen off the radar is a USFS/BLM integrated interpretive management plan for the archaeological resources of Perry Mesa, in particular for the archaeological record between 1200 and 1450A.D.

3. Adaptive Management requires the development of a monitoring protocol, identification of triggers or thresholds which when observed lead to specific changes in management. We expect that Heritage Resources will establish an adaptive management protocol as part of the Proposed Action.

We appreciate the opportunity to submit these comments for your consideration. Please contact me if you have any questions or desire additional information.

Sincerely,



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