ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY

Douglas A. Ducey
Governor

Misael Cabrera
Director

October 17, 2019

U.S. Forest Service, Coronado National Forest
Sierra Vista Ranger District
Attn: Celeste Kinsey, District Ranger (c/o Steven Bluemer)
4070 S. Avenida Saracino
Hereford, AZ 85615

VIA ONLINE SUBMISSION

RE: Subject on Canelo Hills Allotments Analysis

To Whom it May Concern:

The Arizona Department of Environmental Quality (ADEQ) appreciates the opportunity to comment on U.S. Forest Service, Coronado National Forest draft environmental assessment for Canelo Hills Allotments Analysis.

I have circulated your information to the Air Quality, Water Quality and Waste Programs divisions of ADEQ, and after careful review there are a few concerns identified by our staff:

(please see attached document)

Please copy Edwin Slade, Office of Administrative Counsel at slade.edwin@azdeq.gov and Hans Huth at huth.hans@azdeq.gov on all future correspondence and invitations to participate.

If you have any questions, please feel free to contact me with any questions or concerns.

Sincerely,

Edwin Slade
Administrative Counsel

Thank you for the opportunity to review and comment on the Canelo Hills Allotments #54149 Draft Environmental Assessment.

With respect to plans for increasing AUMs on the Papago Grazing Allotment, we observe that Vaughn Canyon is the principal drainage servicing this allotment. Downstream of the allotment, Vaughn Canyon flows through the relatively intact grasslands of the Babocomari Ranch before linking with the Babocomari River.

Of interest, Vaughn Canyon on the Babocomari Ranch is the site of significant headcutting which is putting important grasslands at risk. The extent of head cutting is clearly visible on Google Earth at 31°37'36.35"N, 110°30'4.24"W. Over the last decade, ADEQ, Borderlands Restoration, and private organizations have invested in various strategies for stabilization ranging from gabions, media lunas, and juniper weirs for the purpose of buffering, spreading and infiltrating stormwater from higher up in the watershed. These features are visible in Google Earth in the vicinity of the headcut.

Respective investments have had a limited impact halting the head cut which continues migrating upwards through the Babocomari grassland. Loss of grassland is of concern as it relates to buffering stormflows that deliver sediment to the Babocomari River with impacts on water quality. Much of that sediment is being captured by a dam on the river, also visible in Google Earth at location 31°37'50.78"N, 110°27'2.89"W. This dam is a critical as grade control structure for protection of upstream grasslands. Should a severe flood damage the dam, it further compounds risk to upstream grasslands. Maintenance of the dam is the responsibility of a private party.

Given the significance of the Babocomari grasslands in protecting downstream infrastructure and water quality, ADEQ is identifying neighboring properties in the uplands of the watershed that runs through the ranch. Private land neighbors have expressed interest in continuing our work outside the Babocomari Ranch boundaries for the benefit of the entire watershed system. In this context, the common thread we hear from the ranching community is that restoration efforts must first begin at the top of the watershed to ensure stormwater has an opportunity to be slowed before it becomes a problem. Of significance, ADEQ observes that the Papago Allotment is in the highest part of the Babocomari watershed served by Vaughn Canyon.

On page 35 of the EA, the following is noted:

> In places of higher livestock concentration on the allotments, such as that which occurs near water sources, soil condition is more likely to be impacted by soil compaction and lack of vegetation. Soil erosion may also be an issue in these areas, particularly where the slopes are greater, due to lack of vegetative cover, compaction, and disturbed soil. Lack of vegetative cover and disturbed soil condition also increases the potential for wind erosion in these areas. Wind erosion and water-based soil erosion may somewhat worsen over time in these smaller areas since these areas of diminished vegetation and soil condition would continue and possibly worsen and expand with increased livestock numbers using these more heavily utilized areas. However, in pastures where additional water developments will be placed, the installation of these additional water sources would be expected to more evenly distribute livestock among new and existing water sources, decreasing the soil resource damage at any one water source that may otherwise have occurred from increased livestock numbers at a smaller number of water sources. However, the number of these more heavily used areas would increase with the

installation of new water sources, therefore potentially increasing the overall area that is impacted by increased soil compaction and lack of vegetation.

On page 10 of the EA, ADEQ also notes the following:

> **Papago and O'Donnell Allotments:** Combine the Papago and O'Donnell allotments into one single allotment. Currently, the two adjacent allotments are permitted to the same grazing permittee. This action would help to increase flexibility in management. The newly combined allotment would be authorized for 390 - 520 cow/calf pairs year-long (4,680 – 6,240 AUMs). The proposed capacity is based on 400 cow/calf pairs year-long (4,800 AUMs) on the Papago Allotment, which is an increase from the currently permitted 250 cow/calf pairs, and 120 cow/calf pairs year-long (1,440 AUMs). This overall increase is based off of data gathered from an experimental increase and subsequent production-utilization study, as well as range improvements that have been implemented by the current permittee on the Papago allotment.

ADEQ is concerned that a potential change in the curve number of allotment in the highest part of the watershed may compound challenges already being witnessed downstream of the allotment. ADEQ understands that respective decisions by the NFS are based on experimental data, and that the NFS will use a monitoring and adaptive management strategy to offset impacts if or when they are witnessed. However, we do wish to take this opportunity to highlight the ongoing instability of Vaughn Canyon downstream of the allotment which continues regardless of significant public and private investments. ADEQ sincerely appreciate NFS diligence in taking this into consideration as it relates to monitoring and management of the Papago allotment moving forward.

Thank you.