

Neil Bosworth
Tonto National Forest Supervisor
2324 E. McDowell Rd
Phoenix, AZ 85006
Submitted to: objections-southwestern-tonto@usda.gov
Subject: Bar X and Driveway Grazing Authorization

Dear Mr. Bosworth,

We are responding to the email received on the finding of No Significant Impact (FONSI) and Draft Decision Noticed dated Sept. 9, 2019 from Jeff Sturla and signed by Debbie Cress. Per the email, we can respond to the FONSI as we have prior expressed our concerns.

Specific to answering the requirements of #5 and #6 of the 36 CFR 218.8(d):

1. In our email dated 7/22/19 (bullet #1) we stated that the 2015 and 2018 temporary cattle grazing (which we have since come to the conclusion is an error on the part of the Forest Service as no cattle were in the area of Colcord and Haigler in 2018) trail basis *"so data could be gathered" for NEPA analyses to determine if there were negative effects to resources*. We could find nothing that references what data was collected, and the EA did not detail what inspections or detailed studies were done and how those studies impacted the FONSI.

It has further come to our attention since our email on 7/22/19 that the Turkey/Colcord pasture was grazed in 2015, only to help spread out livestock use by the Bar X and that there was nothing in writing by the Forest Service that determined such test grazing is consistent with the Forest Service Plan and would benefit management of the range resources. We can find nothing in the EA that the Forest Service followed the Forest Service Plan as they should have for this test.

2. A concern we previously stated in our email (bullet #2) in July 2019, regarding the Purpose and Need and Proposed Action, that does not seem to have been addressed in the final EA is that the proposal had only an Alternative A and Alternative B (the all/nothing approach). While the Forest Service may legally not see the comments on the Alternatives A/B by us as *"votes"*, it should be noted that we believe the Forest Service blatantly disregarded our questioning of this simplistic, deck-stacking proposal. Further, the statement that *"form letters are not addressed by volume..."* further makes it seem that the Forest Service completely disregarded the fact that many members of our community are elderly or have a difficult time comprehending hundreds of pages of details in the EA and look to guidance, from others who feel the same way, as to how to reply to the Forest Service. These form letters that were disregarded by the Forest Service damages its reputation and goes against the Forest Services own directive to care for the land and serve people.

Additionally, Alternative B increases the Bar X allotment and still the Forest Service did not complete an Environmental Impact Statement. As your EA stated, since 1979's NEPA completion, the Colcord Canyon and Turkey Peak were removed from grazing. However,

your document goes on to say that the ID team looked at only the last 12 years of data, but did not look at the areas surrounding our communities in making the final decision as the Colcord and Ponderosa Pines communities have not had grazing for these last approx. 40 years. Based on the conclusions, only areas that have been grazed during those 40 years were looked at. As stated in #1 above, where is the data supporting the grazing allotment and opening of the pastures? Further the 2019 EA does not cite the data that would also justify the significant increase in cattle in the area and expand grazing in areas that have not been grazed in years. The EA does not go far enough, and an Environmental Impact Statemen should be completed to ensure an unbiased view into this issue.

3. Another concern raised (bullet #2 in our email) but not addressed is that the Forest Service is turning a blind eye to the past studies from the 1970s (60s, and 80s) and their own historical findings, and the reasons why the areas were closed in the first place. Looking at only the past 12 years of history and disregarding these evaluations is mind boggling to us.

In particular, the EA further states on page 59 of the Final EA: *"Global climate change also poses important implications on state changes in vegetation caused by climate or other disturbances, further decreasing the chances that disturbed sites would return to historical conditions without intensive human management (Ruyle and Dyess 2010)"*. You further state on page 73 *"Grazing can exacerbate the impact of climate change on a watershed (Bescheta et al 2013),"* and that *"With continued drought and higher temperatures, small water sources may dry up leaving less water for cattle and wildlife."* Note that the examples stated here from the Final EA are not cherry-picked but using exactly what the Forest Service cites, while keeping to our former comments. Why is the Forest Service ignoring this? Cattle impacts on streams, soils, vegetation are greater now than in the 1970s/80s and yet the effects of climate change and drought are being ignored in the EA and the Forest Service wants to increase the allotment? This is fully counterintuitive to any normal person, and makes us question why the Forest Service is ignoring these facts? This further justifies the need for an EIS.

4. In our letter dated March 23, 2019 we expressed concern about the safety of people who not only lived in the area, but our visitors. You stated in the EA *"While some comments reflected concerns about safety and conflicts between the multiple uses allowed in the project area, the multiple uses have been practiced in the project area and the overall forest for many years. Although "same place-same time" encounters between uses are understood, they are not considered conflicts or safety issues that require consideration in grazing authorization planning analyses."* However, we now have a pen going up between Colcord Estates and Ponderosa Springs and you want to increase the amount of cattle allowed to graze in the area. Again, this area has been closed for nearly 40 years! How can you state that that conflicts/safety issues are no in play? We understand the law in AZ favors ranchers, but for the Forest Service to effectively dismiss our safety concerns, is disconcerting.

We have a lot more we'd like to comment on, but since we are required only to comment on things we've done so in the past. We would like to see the following by the Forest Service:

- Do a full EIS and use that data judiciously in reviewing the real impact of increasing the cattle allotment and opening up the Colcord allotment. Given that the proposed action will expand grazing into large areas that have not been grazed for decades, and which contain numerous

threatened, endangered, and sensitive fish and wildlife species as well as big game species elk, deer and turkey, there is probably significant effects from the action, and an EIS should be done.

- Keep the Colcord (and Haigler Creek) closed to cattle grazing as you have in the past years. Protect the environment around these areas as prior Forest Service actions have done.
- Ensure that the Forest Service is doing what is right for everyone and for the wildlife habitat and not for the "current allotment permittee's success and productivity". Particularly since Bar X owner had been aware of these closed pastures since he bought it. This land is for all of us. And we believe the Forest Service has a responsibility for the greater good, for both those living here and for those that visit this pristine area. Keep to your motto: "Caring for the Land and Serving People."

We hope that the Forest Service does not disregard this letter, as we are average people who are not trying their best to meet the specifics requirements of the Objections process.

Kathleen (Kathy) Doolittle - signature below
Patrick Doolittle - Signature below

Included as attachments to this email (pdf is electronically signed):
Our email dated March 24, 2019
Our email dated July 22, 2019

Kathleen Doolittle



Doolittle Family Certificate

2019.10.17 11:35:44-07'00

Patrick Doolittle