

October 24, 2019

Mr. Neil Bosworth, Supervisor  
Tonto National Forest  
2324 E. McDowell Rd.  
Phoenix, AZ 85006

Dear Mr. Bosworth,

This is an objection, as per 36 CFR 218.5(a), to the *Draft Decision Notice & Finding of No Significant Impact for the Bar X Allotment & Heber-Reno Sheep Driveway Grazing Authorization* signed on September 5, 2019, by Payson & Pleasant Valley District Ranger Debbie Cress and legally published on September 13, 2019.

On April 7, 2019, I submitted written scoping comments on this project's preliminary environmental assessment (EA) after it was released in March. Then on July 3, 2019, I submitted written comments on the draft EA after it was released in June.

These comments included my concerns about the ecological damage cattle grazing will inflict upon the perennial riparian areas found in the project area. As you know, healthy riparian areas are scarce in the arid Southwest, and provide essential habitat for many wildlife species, including federally listed species. Because of that, their protection should be a primary, if not THE primary, objective of your livestock management plans.

Instead, however, it appears that the District Ranger's primary objective for this project was to get the National Environmental Policy Act (NEPA) process quickly completed in order to be able to legally reauthorize increased cattle grazing as soon as possible. One sign of that is there were only six months between the preliminary EA and the final EA. I've been following livestock management on the Tonto National Forest for many years, and I've never seen a grazing EA completed that quickly – especially for a project this big.

Another sign is the lack of riparian monitoring information in the EA. Figure 7 in the EA is a map that indicates there are seven perennial stream stretches in the project area, including perennial stretches of:

- Canyon Creek
- Cherry Creek
- Gordon Canyon Creek
- Haigler Creek
- Spring Creek
- Walnut Creek
- Rock Creek

And Table 11 shows that these same seven total about 17.7 miles of perennial streams.

The EA's subsequent Table 12 lists eight key stream reaches that will be monitored, but they don't match up with the streams listed in Table 11. The perennial stretches of Haigler Creek, Cherry Creek, and Walnut Creek are included, but the other four perennial stretches listed in Table 11 are missing.

Instead, Table 12 includes three springs that will be monitored, including Allenbaugh Spring, a spring in Colcord Canyon, and Saunders Spring. And it also includes Marsh Creek and Pine Creek, which are listed in Table 11 as being intermittent, but are described on the EA's pages 30 and 31 as having perennial stretches. It's good that the three springs and the other two creeks are going to be monitored, but all of project area's perennial steam stretches should be monitored.

The EA's riparian monitoring details are especially important because cattle weren't allowed to graze these streams for many years before the Payson & Pleasant Valley Ranger District surreptitiously began to allow grazing in them after 2007. The proposed action described in the EA is essentially the same livestock management scheme that was used in the project area from 2007 through 2018. Subsequently, a primary measure of the appropriateness of the proposed action is whether or not that resumption of grazing in the riparian areas degraded the streams – and the EA provides little information about it.

The EA explains that the Forest's guidelines for livestock use of riparian areas limits the consumption of obligate riparian tree species to less than 50 percent of terminal leaders (top one third of plant) on palatable riparian tree species accessible to livestock (usually less than 6 feet tall); less than 40 percent of deergrass biomass; and the maintenance of at least six to eight inches of stubble height for emergent plant species (rushes, sedges, cattails, and horsetails) during the grazing period. This is apparently the level of livestock damage to riparian areas that has been deemed acceptable.

But the EA also states that:

*"Typically, utilization levels in pastures with riparian areas are met within 1 to 2 months and the proposed rotational grazing strategy allows for up to 24 months of non-use before being grazed again."*

This is obviously the same system that was used from 2007 through 2018. It's troubling because it suggests that pasture moves have been, and will be, dictated by the achievement of maximum forage utilization levels in the uplands. That's the opposite of how it should work. The cattle should be moved to another pasture when riparian utilization limits are met, as the riparian areas are the most easily

damaged resources. Cattle can easily inflict serious damage on a stream in just a few days, especially during the summer.

The EA admits that in order for the Forest's riparian utilization guidelines to be effective, the cattle have to be monitored when they are in the riparian areas, or, at the least, the level of use must be assessed immediately after cattle are moved out of them. Since grazing was authorized for several years in the project area on a "tribal basis" using the same management scheme in the proposed action, there should be lots of monitoring data about actual riparian use levels during that time, as per your adaptive management strategy. But there's little in the EA to indicate that any riparian utilization monitoring was completed then.

The EA explains that multiple photo point monitoring occurred on Haigler Creek from 1993 to 2018, and on Walnut Creek from 1997 to 2017. But the most important years are from 2007 until 2018, when increased grazing was authorized, in order to see if there were any trends in their conditions.

The EA's Appendix D shows photos from five different photo point monitoring sites on Haigler Creek, but none of them are identified as being in the stream's key reach. On top of that, according to the EA, portions of Haigler Creek are excluded from grazing or inaccessible to cattle. In other words, it cannot be determined if any of the Haigler Creek photo points in Appendix D were taken on stream stretches which were included in the grazing rotation. Furthermore, the usual methodology for taking photo point photos is to take them at the same spot at the same time of the year. But the Haigler Creek photos in Appendix D were taken during four different months.

The photos of Walnut Creek included in Appendix D were also taken during different months. Also, as with the Haigler Creek photos, the EA doesn't include any information about when the pastures where they were taken were last grazed. A full interpretation of the photos cannot be made without knowing how long the stream had been rested when the photo was taken.

In comparison to the meager riparian monitoring I've described, the EA explains that, since 2007, extensive data about forage utilization on the project area's uplands has been gathered using the "Reading the Range" protocol developed by the University of Arizona Cooperative Extension. In that year eight key upland monitoring sites were established. And by 2014, it says, there were 16 total sites. The EA also includes a map (Figure 4) that shows the specific locations of these upland monitoring sites.

In conclusion, I believe the draft decision notice violates the National Environmental Policy Act (NEPA) because the associated final EA provides inadequate information about how the proposed action will affect the ecological condition of the riparian areas in the project area, as follows:

1. There is no detailed map, or GPS coordinates provided to show the specific locations of the key riparian reaches identified in Table 12 of the EA.
2. The riparian photo point photos in Appendix D of the EA were not taken at the same time of the year.
3. The specific locations of the riparian photo point photos in Appendix D of the EA were not described.
4. There was no information about when livestock grazing had last occurred in the pastures where the riparian photo point photos in Appendix D of the EA were taken.
5. The livestock management system used in the project area from 2007 through 2017 was essentially the same as the proposed action. But the EA does not include any riparian utilization monitoring data from that period.

Furthermore, I believe the draft decision notice violates the National Forest Management Act (NFMA) because it is not consistent with the intent of the Tonto National Forest Plan's long-term goals and objectives. More specifically:

1. The Tonto National Forest Plan states on page 12 that, "Management emphasis in riparian areas will feature wildlife needs over recreation and grazing." And Table 4 in the EA states that, "Riparian utilization would be measured, at minimum, while livestock are in pasture. Excess utilization would result in management changes." But the complete lack of recent riparian utilization monitoring data in the EA implies that it wasn't being done. Moreover, the use of upland forage utilization monitoring, instead of riparian utilization monitoring, as the primary factor in determining when pasture moves are made would mean that livestock grazing has been given a higher management emphasis than riparian protection.
2. The key riparian reaches identified for monitoring are inadequate because they do not include all of the perennial stream reaches listed in Table 11 of the EA.

Thank you.



Jeff Burgess

