

May 12, 2020

The following comments and questions are in response to the *Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project Environmental Assessment*, Carson National Forest, Cibola National Forest, Santa Fe National Forest, and Kiowa National Grassland , April 2020.

Thank you for your consideration.

RE: Issue 1 Livestock Grazing (Draft EA page 9):

*Changes to permitted grazing are outside the scope of this effort; however, the proposed action includes livestock fencing, livestock stream crossings, pasture improvements, and off-channel wildlife/livestock watering (such as upland wells), which would enhance the ability to manage livestock and reduce the impacts of livestock grazing.*

According to the Integrated 303d/305b report (NMED 2019), grazing is the dominant probable source of degradation for waters of the US/State. There is a massive body of research that corroborates this. The Draft EA provides no evidence that degraded conditions were caused by a lack of artificial structures scattered about the landscape yet that is largely the thrust of this effort. Existing condition is the manifestation of decades of land use/management practices. Whatever caused watersheds and riparian areas to be functioning at risk in the first place (i.e. past/present management practices) is the actual “problem” but the draft EA fails to address this in a straightforward manner. Improving management activities so their implementation does not result in resource degradation rather than mitigate impacts after the fact would be a more direct and optimal approach.

***There would be no need for this action if said management issues were sincerely addressed where they actually originate-within the Range program for instance. Unfortunately the USFS continues to avoid addressing this long-standing management issue within the program it occurs. Rather than hold the offending program accountable, this effort endeavors to once again pass the buck to another program and its cadre of outside partners who will come in after-the-fact with their floppy hats and alternative funding sources to treat symptoms.***

Some of the practices presented such as fencing are both appropriate and effective when part of an integrated grazing management strategy. Yet the USFS has apparently decided to address range management issues outside the range management program. Proposed fencing and other structural elements designed to control grazing in sensitive areas should originate in the range program. Creating riparian pastures (as opposed to enclosures), would result in resource recovery while facilitating rotation strategies that expand management options for grazing permittees. In contrast, fencing for riparian enclosures, by design, effectively limits/restricts grazing management options.

**Range management dynamics, rotation strategies etc cannot be adequately considered nor accommodated when grazing is deemed outside the scope of this decision. The approach must be more deliberate and inclusive to achieve multiple objectives. Absent that level of multi-disciplinary coordination, expected range management benefits/improvements/enhancements are unlikely to materialize. A more likely outcome is conflict as these actions are being imposed on range management rather than being integrated into them.**

A more holistic approach that seeks to maximize efficient use of resources and not invite potential conflict between/among multiple uses would be more optimal. Grazing management is fundamental to watershed/riparian condition/recovery. This action is highly unlikely to achieve its goals if/when the primary solution is not even part of the conversation. The USFS unwillingness to focus efforts on the root cause of resources degradation precludes long term recovery. Most of the mitigation practices presented in the draft EA have utility but none of them are a substitute for sound management. Mitigation-centric approaches create a slippery slope because they provide cover for problematic management practices. This subsequently perpetuates the problem.

**It is now the year 2020 and the USFS has had decades to address persistent watershed/aquatic resource issues. The main question here is what makes this effort materially different from the countless initiatives of the past? How many more decades, millions of dollars, and artificial structures are we away from recovery in the Valle Vidal for instance? Is doubling down on what we've been doing all these years really going to succeed or might this be a good time to reconsider our approach? As a wise Forest Hydrologist once told me, "We'll never get there building stuff. Management is what has to change".**

The term "restoration" is used generically throughout the document. It is also treated as though synonymous with mitigation but these are not synonymous terms. Proposed actions are primarily designed to *mitigate* impacts from past/present management which places this proposed action squarely in the mitigation category. Per the WCF, targeted systems are determined to be functioning at risk but there is little to no detail describing which functions are compromised and/or about the stressors responsible. Needless to say, a handful of in-stream structures and riparian fencing is unlikely to restore system functions. Especially if/when stressors have not been correctly identified, addressed, and/or previously eliminated from the scope altogether.

It is incumbent upon resource managers/professionals to preserve the integrity of terms and their meaning. Yet the term *restoration* has become increasingly accommodative to the point of being generic. The loss of detail results in lowered precision, less accuracy, elusive expectations, fungible accountability, invites misinterpretation, and subsequently misleads the public. Please replace the word *restoration* with a term that accurately reflects what is being proposed and/or make it clear that the proposed action does not aspire to the highest ecological/function-based standard that defines restoration. Alternatively, please provide a list of systems the USFS has successfully "restored" so that the public may understand your precise meaning.

**Questions:**

- **Given that grazing represents the main cause of riparian degradation, please explain why grazing is considered to be outside the scope of this decision.**
- Please explain why this decision includes a multitude of range management-related elements when grazing was determined to be outside the scope of the decision.**
- **Please describe how the proposed action will achieve its intended goals when the primary stressor is not being addressed.**
- Please describe how excluding range from the scope influences the significance of impact for this decision.**

- Given that riparian condition and range management are inextricably linked, please explain how excluding grazing from the scope is not segmenting this action.

-Please describe the administrative process for formally integrating grazing management “enhancements” outlined in Issue 1 livestock grazing, i.e. *“enhance the ability to manage livestock and reduce the impacts of livestock grazing”*, into range management strategies/AMPs.

-Please provide the administrative timetable for formally integrating grazing management “enhancements” outlined in Issue 1 livestock grazing, i.e. *“enhance the ability to manage livestock and reduce the impacts of livestock grazing”* into range management strategies/AMPs.

- Given that grazing is outside the scope of this decision, please describe how the above is being coordinated/accomplished outside of this administrative process.

- Please provide rationale for mitigating symptoms rather than addressing the underlying problem, i.e. the management practices that got us here in the first place.

-Has the USFS transitioned to a strategy that prioritizes mitigating resource degradation after it occurs rather than adjusting management practices so that degradation doesn’t occur in the first place? If not, please dispel the apparent contradiction.

-Please explain how treating symptoms rather than the problem will achieve intended long-term recovery outcomes.

Sincerely,

[REDACTED]

Albuquerque NM

[REDACTED]