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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

January 24, 2022

Kurt Davis
Acting Coronado National Forest Supervisor
300 West Congress
Tucson, AZ 85701

objections-southwestern-coronado@usda.gov

Sent via email this date

**RE: Objection to Gardner Canyon Allotment Analysis Project Environmental Assessment
(#50238)**

Dear Mr. Davis,

The following Objection to the Gardner Canyon Allotment Analysis Project Environmental Analysis (EA), Draft Decision Notice and Finding of No Significant Impact (DDN/FONSI) is being submitted on behalf of the members of Western Watersheds Project (WWP), our staff, board, members and supporters who are concerned with the management of our public lands. WWP previously submitted comments for this project on November 22, 2018 (attached as Appendix A). The legal notice for this decision was published on December 10, 2021 and this objection, filed January 24, 2022, is therefore timely.

This Objection is filed pursuant to, and in compliance with, 36 C.F.R. Part 218, Subparts A and B. All parties to this objection have filed timely, specific and substantive written comments in accordance with 36 C.F.R. 218(a).

As required by 36 C.F.R. § 218.8(d), Objectors provide the following information:

1. The name and contact information for the Objector is listed below.
2. This Objection was written on behalf of Objector by Cyndi Tuell whose signature and contact information are below.

3. Western Watersheds Project is the Objector. Cyndi Tuell is the Lead Objector for purposes of communication regarding the Objection.

Cyndi Tuell
Western Watersheds Project
738 N. 5th Ave, Suite 206
Tucson, AZ 85705

4. The project that is subject to this Objection is “Gardner Canyon Allotment Project.” The Responsible Official is James Copeland, District Ranger for the Nogales Ranger District.
5. Objector submitted, timely, specific, and substantive comments during the Public Comment Period on November 22, 2018. All points and issues raised in this objection refer to issues raised in that comment letter or new information.
6. In the following Statement of Reasons, Objectors provide the specific reasons why the decision is being appealed and the specific changes or suggested remedies that he seeks, along with the related evidence and rationale on why the decision violates applicable laws and regulations.

NOTICE OF OBJECTION

Pursuant to 36 C.F.R. § 218, Western Watersheds Project is filing an Objection regarding the Draft DN/FONSI and EA for the Gardner Canyon Allotment Analysis Project in the Nogales Ranger District of the Coronado National Forest.

INTRODUCTION

This project covers 10,271 acres of federally managed public lands that are located on important habitat for threatened and endangered species, 82 species on the Regional Forester’s list of Sensitive Species, and in rare riparian areas of the Southwest. The U.S. Fish and Wildlife Service determined that this decision is likely to adversely affect the Chiricahua leopard frog, the yellow-billed cuckoo, and the northern Mexican gartersnake and may affect critical habitat for the yellow-billed cuckoo, the Mexican spotted owl and its designated critical habitat, the jaguar and its designated critical habitat, as well as the ocelot, Huachuca water umbel, and the Gila chub. The decision increases the number of authorized Animal Unit Months (AUMs) from an average actual use of 1,328 AUMs to 2,800 AUMs, changes the use from seasonal to year-long, and increases the number of acres grazed by 9,491 acres, which authorizes 27 new (or “extra”) pastures. Approximately 7 new miles of pipelines, plus troughs and drinkers are required additions to the allotment to make it suitable for livestock grazing. The analysis and decision rest heavily on the use of monitoring and “adaptive management” to dismiss the reality that this allotment is ill-suited for livestock grazing. The Forest Service has failed to adequately address the concerns we raised in our prior comments, has relied upon outdated monitoring information, and has made arbitrary and capricious decisions regarding the use of the best available science. Because of the Forest Service’s failure to comply with the National Environmental Policy Act, the Administrative Procedures Act, the Endangered Species Act, the National Forest Management Act, and the failure to use the best available science, we Object to the decision to authorize livestock grazing on the Gardner Canyon Allotment.

For these reasons, the Forest Service is precluded from a Finding of No Significant Impact (FONSI) and must withdraw this Decision Notice and FONSI. We describe our concerns more specifically below.

STATEMENT OF REASONS

We have noticed that, in the past, when asked to do site specific analysis at the project level the Forest Service has deferred that analysis to the Forest Plan Revision process. Then the Forest Service made clear in the Plan Revision analysis that "site specific" decisions and analysis would be conducted at the project level. Then, when the Forest Service gets back to those project level decisions (as for this project) it refers back to the decisions made in Forest Planning. Thus, the analysis never actually occurs. This is the case for the analysis and decision on the Gardner Canyon allotment.

The Forest Service regularly states that livestock grazing has occurred in an area for a long time, apparently as evidence that it is an appropriate use of that area and to assure the public that while the current conditions are the result of livestock grazing from the past, the Forest Service will make sure to manage it better in the future. Unfortunately, we are not assured. Further, what the Forest Service regularly fails to do is acknowledge that the area has been in use for a considerably longer period of time by the Indigenous groups in the area, and that other users of the forest, including recreational users, have also been using the same area for as long, or perhaps longer than the livestock industry. Here, the historic and current uses of these lands by the permittees resulted unsatisfactory range conditions, despite an average of "less than" 45 percent utilization in key areas (though how much less is not described), and now the Forest Service has decided that the permittees can *increase* utilization by increasing the number of AUMs by 47 percent. The Forest Service has thus abdicated its responsibility for land management and has given an official stamp of approval to an adaptive management scheme based on flawed, outdated, and debunked livestock grazing "science" known as the "Savory Method," or the "poop and stomp" method of "livestock management," which we explain in more detail below. The decision relies heavily on monitoring and active livestock management, neither of which occur with any regularity and both of which are expensive. The fact that the permittees have a significant financial interest in ensuring livestock grazing continues on these lands regardless of the impacts to natural resources or future generations has apparently slipped by the Forest Service decision-makers.

National Environmental Policy Act Violation Concerns

I. The Forest Service Failed to Use the Best Available Science

In our prior comments, at page 5, we asked the Forest Service to reconsider its reliance on outdated livestock grazing recommendations and literature – specifically Savory 1980 and Savory and Parsons 1988. Reliance on these publications is misplaced because the recommendations are not applicable to the project area because the vegetation communities differ significantly and the Savory Method is not based on the best available science.

The Forest Service relies on science that has been widely criticized as invalid in its own right *and* invalid if applied to the southwestern U.S., by citing to Savory (1988) and Savory and Parsons (1980) in both the EA (at pages 27-28) and the watershed report (at page 8, full citations at page 23), which is

itself outdated (from 2017) and fails to reflect any consideration of public comments. This is one of just a handful of scientific references found in the Forest Service documents provided for public review and comment (specifically in the Watershed Report). There are *no references* listed in the EA. The Forest Service directs the public to “[a] list of references for the Gardner Allotment Analysis can be found in the project record.” 2021 CNF EA at 40. It is statements like this, referring the public to a non-publicly accessible source of information that is key to the decision-making process that spurred us to request that the Forest Service provide the list of references used as part of the decision-making process for this project for public review. WWP 2018 at 5. Instead, the Forest Service directs the public to visit a District Ranger office that has been only sporadically open for the past two years. It boggles the mind why the Forest Service would not include a list of the references it bases a NEPA decision on, especially after a specific request to do so during a public comment period.

Hall, Weinstein and McIntire ((Hall et al. (2005) at 10.6-10.7) specifically address adaptive management and the inapplicability of Savory’s conclusions and recommendations:

Short-Duration Grazing

Short-duration grazing was first developed in Zimbabwe by Allan Savory and later introduced to the U.S. This type of system also has been referred to as rapid-rotation, time-control, and cell grazing. Savory’s subsequent modifications of the basic approach have been called the Savory grazing method or holistic management. Short-duration grazing differs from other grazing systems in that a range unit is typically divided into several small pastures (also called paddocks or cells), each of which may receive more than one period of non-use and grazing during a single growing season. Five to 12 pasture units commonly may be involved in which the grazing periods last from three to 14 days followed by a non-grazing period of up to 60 days to enable forage regrowth (ideally the grazing period should be five days or less followed by at least four weeks of non-use [Holechek and others 2004b]; however, pasture rotations and non-use periods are dependent on growing conditions). Livestock may be moved less frequently if the system is applied when the vegetation is dormant. Pasture layout is variable, but typically may involve a wagon-wheel arrangement of fences with water and livestock-handling facilities located in the center of the range unit. Stocking rates supposedly can be increased substantially (even doubled or tripled) compared to continuous and other grazing systems. The increase in stocking rates achieved presumably results from better livestock distribution—the confinement of a large number of animals to a small area for a short period improves uniformity of use and forces the use of areas and plants that would not otherwise be used.

The proponents of short-duration grazing maintain that when properly implemented the system results in numerous benefits to rangeland resources, including improved water infiltration as a result of hoof action, increased mineral cycling, and reduced forage selectivity so that more plants are grazed and the range is grazed more evenly. The purported benefits of this system, however, often go unrealized (Bryant and others 1989, Brown 1994b, Howery and others 2000, Sayre 2001, Holechek and others 2000, 2004b; see also Chapter 7). From a theoretical standpoint, short-duration grazing should work best in flat, humid grasslands with more than three months of plant growth and over roughly 20 inches (50 cm) of average annual precipitation (Holechek and others 2004b). Short-duration grazing is generally less feasible in

the arid and semiarid regions of the western U.S. in which growing seasons are relatively short, productivity is low, plant growth rates are more often than not slower than the rotation rate (D. Milchunas, personal communication), and drought is frequent. Especially in arid regions, the limited and highly variable production of forage does not support high stocking rates, and concentration of livestock early in the short growing season can cause severe trampling and soil compaction, heavy defoliation, and erosion, with little opportunity for recovery (Holechek 1983, Warren and others 1986, Bryant and others 1989, Brown 1994b, Howery and others 2000, Holechek and others 2000, 2004a, b). Desert grasses as a group, in particular, may be detrimentally affected by short-duration grazing because their regrowth occurs over a short period of time, they show low resistance to grazing compared to prairie grasses, and they are susceptible to long-term damage if overgrazed during drought (Holechek 1983, Howery and others 2000, Holechek and others 2004b). Furthermore, in areas where large differences exist between the palatability of plants (such as in many plant communities of the Sonoran Desert), attempts to encourage cattle to eat less preferred forage can be unsuccessful and result in depletion of preferred species.

In this EA, the Forest Service then relies upon Holechek et al. (2004)¹ (at CNF 2021 EA at 9) which is cited in the above excerpt from Hall et al. 2005 to debunk Savory. The Forest Service cannot at the same time rely upon Holechek et al. (2004) *and* Savory and Parsons (1980) to justify this ill-advised grazing authorization and decision. We provide the Hall et al. (2005) document in its entirety as Appendix B to this Objection.

Further criticism of Savory's grazing methods is found in the Society for Range Management. (Briske et al. (2013))². In this response to Allan Savory, the five authors, which include a Texas A&M professor, a research ecologist from the Jornada Experimental Range in New Mexico, a research scientist from the Jornada Experimental Range, a distinguished professor from Oklahoma State University's Department of Natural Resources Ecology and Management, and a research ecologist from the USDA-ARS Grassland, Soil and Water Research Laboratory in Temple, Texas, state that "Mr. Savory's attempts to divide science and management perspectives and his aggressive promotion of a narrowly focused and widely challenged grazing method only serve to weaken global efforts to promote rangeland restoration and [carbon] sequestration...Scientific evidence unmistakably demonstrates the inability of Mr. Savory's grazing method to reverse rangeland degradation or climate change, and it strongly suggests that it might actually accelerate these processes." (Briske et al. (2013) at 74. They also specifically disavow the Savory "poop and stomp" or "hoof action" benefits as a method of rangeland restoration, stating that it is "grossly overstated and without supporting evidence, other than a few select photos." *Id.* at 73. We attached this article as Appendix C.

The Forest Service must either disavow its reliance on Savory and Parsons (1980) because the premise of the publication is inapplicable to southwestern deserts and has been roundly debunked by the scientific community, or it must acknowledge there is a scientific controversy and therefore an Environmental Impact Statement (EIS) must be prepared.

¹ At least, we believe the Forest Service relies upon this same publication. It is difficult to determine because the Forest Service did not provide a list of references used in the EA.

² Briske, David D., Bestelmeyer, Brandon T., Brown, Joel R., Fuhlendorf, Samuel D., and Polley, H. Wayne. 2013. The Savory Method Can Not Green Deserts or Reverse Climate Change. Society for Range Management. Rangelands 35(5):72-74. October 2013. doi: 10.2111/RANGELANDS-D-13-00044.1.

The Forest Service has not used the best available science, has completely failed to respond to our concerns on this point, and has made arbitrary and capricious decisions as to which scientific literature it will consider. Therefore, the Forest Service cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

II. There is New Information the Forest Service Must Consider and Allow the Public to Consider

A. The Forest Service must consider impacts to the cactus ferruginous pygmy owl

As the Forest Service is likely aware, the U.S. Fish and Wildlife Service very recently published a proposed rule to list the cactus ferruginous pygmy owl (*Glaucidium brasilianum cactorum*) as a threatened species under the Endangered Species Act, and to designate critical habitat. 86 Fed.Reg. 243, 72547-72573. December 22, 2021. Docket No. FWS-R2-ES-2021-0098. Attached as Appendix D.

Livestock grazing can have detrimental impacts to the owl if it harms the plant community upon which the owl depends. The Forest Service must consider management adjustments that will protect the owl before it can move forward with a decision for these allotments because the owl's habitat includes the project area (at page 72559 of the Fed.Reg. notice):

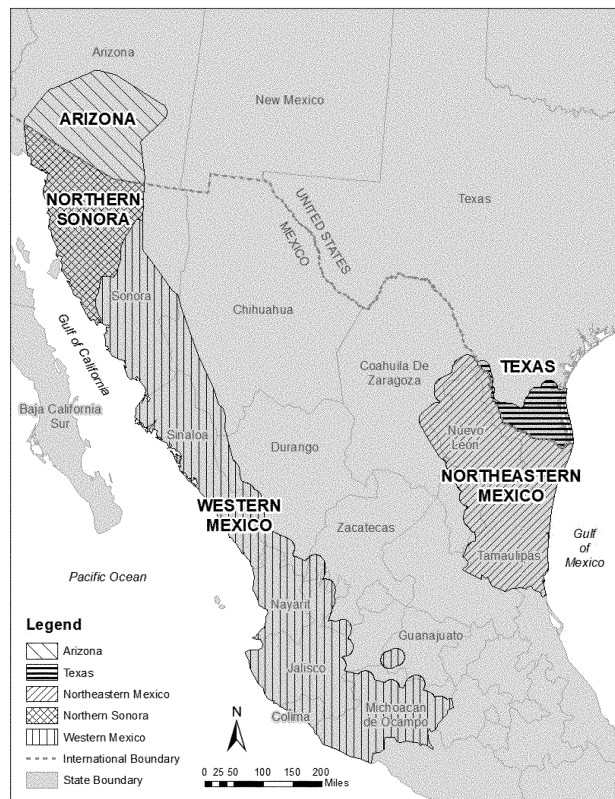


Figure 1. Cactus ferruginous pygmy-owl's range in the United States and Mexico, including the five analysis units used in the SSA.

III. The Purpose and Need is Insufficient

In our prior comments we expressed our concern about the inadequacies of the Purpose and Need Statement. WWP 2018 comments at 1. As stated in the EA, “[t]he of this project is to incorporate the elements of the Coordinated Resource Management Plan (CRMP) into the proposed authorization of livestock grazing on the Gardner Allotment and to ensure the allotment continues to be managed in accordance with the Coronado National Forest Land and Resource Management Plan objectives and desired conditions...There is a need to authorize a change from seasonal to yearlong use...[and] There is a need to increase Animal Unit Months (AUMs) to 2,800 to allow managers to better manage the allotment and run one herd throughout the allotment.” 2021 CNF EA at 1.

The entire purpose of the project is to reauthorize livestock grazing, not *determine whether or not livestock grazing is appropriate on these specific lands*. The need to improve desired conditions is entirely dependent on the perceived need for livestock and the need to improve management and to run one herd throughout the allotment.

The Forest Service response in the EA fails to address our actual concern, which is that the Forest Service has failed to look at the actual impacts of this project because it has failed to properly identify the scope of the project.

We ask that this decision be remanded for further analysis because the Forest Service should take a hard look at whether livestock grazing is appropriate, instead of using an EA to rubber stamp approval of livestock grazing on these allotments. The Forest Service should be engaged in the NEPA process *to determine whether or not to authorize livestock grazing* on these lands. As the Forest Service is aware, while *where consistent* with other multiple use goals and objectives, there is Congressional intent to allow grazing on suitable lands, and while this allotment *may* contain lands identified as suitable for domestic livestock grazing in the 2018 Forest Plan, there is nothing in the regulations controlling livestock grazing on public lands that *requires* livestock grazing to be permitted. The permittee has not been utilizing the full allocation of the previously permitted AUMs and that is prima facie evidence that there is *not* a “need” for more cows on these lands.

Out of the 1,783,934 acres managed by the Forest Service in the Coronado National Forest, the 2018 Resource Management Plan (RMP) excludes 719,999 acres on slopes greater than 40 percent.³ Out of the 1,063,935 acres remaining, the Forest Service identifies just 47,708 acres as not suitable for livestock grazing with the vast majority of those unsuitable acres, 36,774, identified as developed recreation areas. 2018 CNF RMP at 170, Table 16. Unfortunately, the Forest Service did not re-evaluate capability in the 2018 plan revision, instead relying on the 1980’s capability determination based on “current conditions and site conditions such as climate, slope, landform, soils, and geology.” 2018 CNF RMP at 169. The Forest Service justified the adoption of the capability analysis by stating that “[l]andscape scale conditions that determine capability (such as landform, geology, slope, and climate) have not changed significantly since the first evaluation” and therefore the 40 year-old analysis “is still applicable.” 2018 CNF RMP at 169. Clearly, the adoption of the capability analysis ignores the impacts of climate change, which the Forest Service inappropriately identified as

³ Please note that this does not mean livestock grazing is not permitted or is not occurring on these 700,000+ acres, but rather that the Forest Service doesn’t believe livestock prefer to graze these areas.

“[c]yclical or temporal fluctuations in climate conditions such as El Niño cycles or drought periods.” 2018 CNF RMP at 169.

However, in the Forest Plan, the public was promised that even though the outdated capability analysis was not revisited, they would be “considered by Coronado National Forest staff when making project level grazing decisions and responded to through adaptive management.” 2018 CNF RMP at 169. But, for this project, the Forest Service has refused to make a determination as to whether these allotments are capable of supporting the number of livestock and instead refer back to the “under 40% slope and capable of producing 100 lbs per acre of forage” assumption used in Forest Planning. 2021 CNF EA at 2.

If and where the Forest Plan identifies lands as *suitable* for livestock grazing, this “does not mean that the use will occur over the entire area.” (2018 CNF RMP at 169.) Rather, the identification of an area as suitable for livestock grazing is just “*guidance* for project and activity decision making and is *not a resource commitment or final decision* approving projects and activities. **Final decisions on resource commitments are made at the project level. The final decision to authorize livestock grazing would be made at the project (allotment) level.**” (2018 CNF RMP at 169, emphasis added.)

Reliance on an inaccurate Purpose and Need statement and an outdated determination that the area was perhaps capable of supporting livestock grazing in the 1980s, has resulted in a failure to take a hard look at the actual impacts of livestock grazing in an ecologically, recreationallly, and culturally important area. In light of climate change and drought, it is especially important that the Forest Service make careful, thoughtful determinations regarding livestock grazing at this time.

This circular system of justifying livestock grazing throughout nearly the entire Coronado National Forest, and specifically on the Gardner Canyon allotment, is inappropriate, fails to use or even acknowledge the best available science, and is in violation of NEPA, the APA, and NFMA. The question that has not been asked since the 1980s is whether or not *these specific lands* are capable of producing more than 100 pounds per acre per year of forage. The only criteria used in the Forest Plan was slope of less than 40 percent. Therefore, neither the Forest Service nor the public have any idea how much forage these allotments are actually capable of producing. Regardless, the Forest Service forges ahead to not only authorize livestock grazing here, but actually plans to *increase* the number of cows on the land.

For this decision, we have calculated the amount of forage needed per acre for the authorized AUMs in the table below. This shows that the lands in question will need to produce 301 pounds of forage per acre just for livestock, which are to consume at most 45% of the available forage. The NRCS information for Land Resource Unit 41-1AZ,⁴ Mexican Oak-Pine Woodland and Oak Savannah indicates that the total annual average production is ~1,500 pounds per acre, which includes many non-forage species. The estimated grass/grasslike production is ~900 pounds per acre, and again, this includes non-palatable species such as Lehman’s lovegrass which are low in nutrition and not preferred by livestock. We cannot locate information for the Range Woodlands LRU (41-3 AZ), and the information we can find for LRU 41-3AZ indicates it is in Southeastern Arizona and classified as Semidesert Grasslands, not “Range Woodlands” as indicated in the EA at page 23. The Forest Service has not provided similar information in the EA.

⁴ Attached as Appendix E.

This leaves the question unasked and unanswered, are these specific lands capable of producing the 301 pounds of forage for livestock per acre needed under this decision, while leaving at least 55% of the available forage for wildlife? The Forest Service has not determined whether these lands are capable of producing this amount of forage and has not disclosed how drought and climate change has impacted the capability of these lands to support this level of livestock grazing (if the Forest Service has done these calculations, they are not in the Forest Plan nor EA). These numbers also do not account for long-term drought and climate change impacts on forage production.

Allotment	Acres total	Acres supporting livestock (capable)	AUMs (year long)	Forage needed total for permitted AUMs⁵ (in pounds)	Forage needed per acre for permitted AUMs⁶ (in pounds)
Gardner	10,271	8,367	2800	2,520,000	301

Yet, the Forest Service began this project with a purpose and need that required the authorization of livestock grazing – it is a foregone conclusion. The Forest Service specifically refers back to the Forest Plan for its position that this project area is “suitable and capable for grazing” but has failed to make any such actual determination in this decision. Note that the purpose and need for the project *does not* include “make a determination as to whether these allotments are suitable or capable for livestock grazing.” This is a major failure in the EA, rendering the decision invalid. The Forest Service should withdraw the Decision Notice and FONSI, and reinitiate the NEPA analysis for this project to include a purpose and need statement that includes the need for a suitability and capability determination, and a need to determine *whether or not* livestock grazing will be authorized.

It is not the job of the Forest Service to simply provide for livestock grazing on public lands because an application has been submitted or livestock permittee has economic interests in doing so. While the permittee may really want to continue grazing his livestock on federal public lands, they have no “right” to do so and the Forest Service is not required to allow livestock grazing on the allotment without first determining whether doing so is appropriate in light of the ecological conditions on the ground at this point in time and here, the Forest Service has not made that determination.

We asked the Forest Service to properly frame the purpose and need for this project because the alternatives developed from that proper framing, and the environmental analysis that flow from an actual hard look at the impacts of those alternatives, would have provided a more accurate picture of the impacts of livestock grazing on the lands managed by the Forest Service for the public. The Forest

⁵ Note that this calculation uses the University of Arizona Cooperative Extension stocking rate calculation of 900 pounds of forage per 1000-pound cow per month. The (number of AUMs) x (900 pounds of forage) = the amount of forage harvested per month. In our previous comments we provided information that livestock weights have increased over the last few decades and the average cow is 1,300 pounds, which would increase the amount of forage needed per cow, but the Forest Service did not address our concerns about this increased weight for livestock.

⁶ This number is calculated as (forage needed from the above calculation) divided by (acres supporting livestock).

Service has not adequately responded to our concerns and therefore, cannot rely upon this Decision Notice and FONSI to authorize livestock grazing.

IV. The Forest Service has Relied Upon Outdated Information

The reliance upon outdated information and direction, such as the capability analysis from the 1980s is also likely to lead to a violation of NFMA. In addition, the EA includes information on actual use “for the past five years” but those five years are 2012 through 2016, leaving the actual past five years of actual use undisclosed. 2021 CNF EA, Table 1 at page 2. This information should have been updated in the EA and the failure to do so is a violation of NEPA and impedes the public’s ability to comment on this project, or to provide oversight of government actions and decisions.

V. The Range of Alternatives is Inadequate

We identified our concerns about the range of alternatives in our prior comments. 2018 WWP comments at 2-3. The Forest Service failed to adequately respond to our concerns and there is no alternative that would reduce the number of AUMs authorized on the allotment.

Because the Forest Service has not adequately responded to our concerns, has not analyzed a reasonable range of alternatives, it cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

VI. The Forest Service Failed to Response to Specific Comments

We asked the Forest Service to provide the CRMP for this area and this was not provided. WWP 2018 at 5.

We asked the Forest Service to disclose and analyze impacts to predators. *Id.* This was not done.

We asked the Forest Service to remove all references and reliance on Savory or Savory and Parsons, this was not done. *Id.*

We asked the Forest Service to provide of list of references. *Id.* This was not done.

We asked the Forest Service to disclose and analyze the impacts of trespass livestock, especially in Smith Canyon. *Id.* at 5. This was not done.

The failure to address relevant issues raised by the public is a violation of NEPA. For this reason, and for all of the foregoing, the Forest Service must withdraw this draft EA and FONSI and provide adequate analysis of the impacts of this decision, and provide responses to concerns raised by the public.

Other Violations of Law

VII. Violations of the Endangered Species Act

We raised our concerns about the impacts to threatened and endangered species and the Forest Service's failure to adequately comply with the Endangered Species Act (ESA) in our prior comments. WWP 2018 comments at 4. Unfortunately, the Forest Service continues to ignore the impacts of trespass and unauthorized livestock on threatened and endangered species and does not take that information into account when making its affect findings. Nor does the Forest Service adequately consider the realities of monitoring, or rather, the reality of the lack of monitoring, when making affects findings.

These failures result in a skewed Biological Assessment and Biological Opinion and the U.S. Fish and Wildlife Service concurrence is based on flawed information, resulting in violations of the ESA.

VIII. Violations of National Forest Management Act (NFMA)

The Forest Service has not adequately considered the impacts of this decision on the lands located in the Coronado National Forest and therefore cannot accurately, nor adequately, identify or consider the impacts of this decision on forest resources. Failure to ensure accurate and adequate analysis is likely to result in a failure to comply with the Forest Plan and is a violation of NFMA.

CONCLUSION

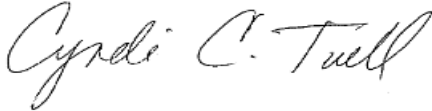
We continue to wonder how many endangered species, special protective land designations, and decades of drought it will take for a land management agency to do the right thing and put a halt to or reduce livestock grazing in the desert, or at least get a federal land manager to take an actual hard look at those impacts by preparing an Environmental Impact Statement? The Gardner Canyon Allotment grazing and infrastructure authorization via an inadequate EA make it clear that the Forest Service is not willing to do that work, and this is very unfortunate. Therefore, we object to this decision.

Relief Requested: The Forest Service must withdraw the Draft FONSI/DN and prepare a supplemental analysis, including an EIS for this project. It must fully consider the scientific references we provided or cited to in our prior comments.

Thank you for your consideration of this Objection. If you have any questions or wish to discuss the issues raised in this objection letter in greater detail, please do not hesitate to contact me.

Sincerely,

Thank you,



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ATTACHMENTS

Appendix A

Comments of Western Watersheds Project submitted on August 30, 2019.

Appendix B

Hall, John A., Stephanie Weinstein, Cheryl L. McIntyre. 2005. The Impacts of Livestock Grazing in the Sonoran Desert: A Literature Review and Synthesis. The Nature Conservancy, Phoenix Field Office. Federal Cooperative Agreement No. AAA-02-0005, Task Order AAF-02-0001. 298 pgs.

Appendix C

Briske, David D., Bestelmeyer, Brandon T., Brown, Joel R., Fuhlendorf, Samuel D., and Polley, H. Wayne. 2013. The Savory Method Can Not Green Deserts or Reverse Climate Change. Society for Range Management. Rangelands 35(5):72-74. October 2013. doi: 10.2111/RANGELANDS-D-13-00044.1.

Appendix D

U.S. Fish and Wildlife Service Proposed Rule to list the Cactus Ferruginous Pygmy Owl as a Threatened Species, with Critical Habitat. 86 Fed.Reg. 243, 72547-72573. December 22, 2021. Docket No. FWS-R2-ES-2021-0098.

Appendix E

NRCS information for LRU 41-1AZ, Mexican Oak-Pine Woodland and Oak Savannah.

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