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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

March 19, 2021

Tom Torres
Acting Forest Supervisor
2324 E. McDowell Rd.
Phoenix, AZ 85006

Submitted via email to: objections-southwestern-tonto@usda.gov

**Hicks Pikes Peak Allotment Grazing Authorization
EA Objection
Tonto National Forest**

Dear Mr. Torres,

The following Objection to the Hicks Pike Peak Grazing Authorization 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) who are concerned with the management of our public lands. WWP previously submitted comments for this project on August 30, 2019, and have included these comments as Appendix A. The legal notice for this decision was published on February 3, 2021 and this objection, filed March 19, 2021, 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 “Hicks Pike Peak Allotment Grazing Authorization EA.” The Responsible Official is Adam Brawly, District Ranger for the Globe Ranger District.
5. Objector submitted, timely, specific, and substantive comments during the Public Comment Period on August 30, 2019. 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, Objector provides 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 for the Hicks Pike Peak Grazing Authorization EA in the Globe Ranger District of the Tonto National Forest.

INTRODUCTION

This project covers 68,838 acres of federal public lands divided into 21 pastures ranging in size from 500 acres to over 10,000 acres and includes designated Wilderness, a Wild and Scenic River, multiple riparian areas, sensitive wildlife habitat, and habitat for species listed as threatened and endangered, and the majority of the project area includes soils that are extremely susceptible to erosion. USFS 2021 EA at 6 and throughout. The failure of the Forest Service to adequately address our concerns raised in prior comments, the geographic and temporal scope along with the special designations and species found in this area, and the proposal to use mechanized and motorized equipment in designated Wilderness, require the development of an Environmental Impact Statement (EIS) and preclude a Finding of No Significant Impact (FONSI).

We describe our concerns more specifically below.

STATEMENT OF REASONS

I. We Object to the Removal of the Following Language from the EA

The Forest Service has removed important language from the EA that had been included at page 13. We ask that this language be reinstated because the study shows how long the lack of monitoring and inability to manage livestock utilization has been ongoing on this allotment. The decision to remove this important language inaccurately implies that rotational grazing is a solution to significant, long-term, ongoing grazing impacts. We have included the missing language (in *italics*) bracketed by the language now found in the EA (in **bold and underlined**) and ask that the description of the study

results be included in the final EA for this project.

In 1985, a production utilization study was conducted throughout the entire allotment. *At that time, the allotment was under continuous yearlong grazing with low forage cover and decreased soil stability, based on long term monitoring data. These conditions, when reviewed by Forest Service personnel, recommended allowable livestock grazing use to be set at 20 percent key perennial grasses and 30 percent key browse. These recommendations were made, but never implemented, on the allotment. Allowable use was measured in areas where livestock had access and was not measured on highly erodible soils or areas with no palatable perennial forage. This 1985 study determined that the majority of the allotment was stocked at higher levels than are sustainable for forage plants. At that time, utilization on key species was found to be between 60 and 80 percent. Livestock were not moved to areas of lower utilization and instead congregated in easily accessible areas before moving to others. This lack Livestock were not moved to areas of lower utilization and instead congregated in easily accessible areas before moving to others. This lack of livestock distribution was noted by the difference in vegetation between easily and tougher areas to access, due largely to excessive stocking and continuous yearlong grazing. Pasture structure did not allow for reasonable livestock rotations and new fences were recommended to offset these results. Lower Shute pasture had a distribution problem due to the available water sources in the canyon bottoms of Shute canyon and the Salt River.* **The conclusion and recommendation of that study determined that for an allotment under rotational management with two out of three years' rest, back to back, capacity could be 629 head of cattle with 522 head natural increase.**

At page 22, footnote 5 of the 2019 EA the Forest Service indicated that split pasture data would be available in the forthcoming EA.

Some allotment pastures have been split since data were calculated. **Split pasture data will be available in the Final EA.**

However, this split pasture data does not appear to be available and the EA now states simply:

Some allotment pastures have been split since data were calculated.

The Forest Service should have provided the split pasture data or directed the public where in the more than 150 page EA it can now be located. The Forest Service should also have explained, if this data is not included, why the Forest Service was unable to provide this information in the year since the 2019 EA was provided to the public. It is not clear how old the Soil Condition data is, but it is apparently older than the "recent years" in which the pastures were split. This begs the question as to whether the Forest Service is relying on outdated data, especially in light of recent fires, ongoing, historic drought, and climate impacts.

The foregoing shortcomings in the EA render the DN and FONSI invalid and require additional analysis and public review.

II. Financial Information Regarding Past and Proposed Range Improvements Was Not Provided.

We asked the Forest Service to disclose any and all information regarding the use of federal and state monies for range “improvements” on this allotment. WWP 2019 comments at 3. The public has a right to be informed as to how much money the permittee has received from federal funding sources such as EQIP grants, NRCS grants, disaster relief, Arizona Game and Fish funds, or any other federal or state funding sources.

In response, the Forest Service identified various possible sources for range infrastructure in a generalized way in the Response to Comments, but stated “[r]equests for specific information about how these particular improvements would be paid for is outside the scope of the decision for this project.” USFS 2021 Response to Comments at 3. The Forest Service also noted that “[r]ange improvements are part of the existing conditions and are outside the scope of this decision. Maintenance of range improvements are assigned to the grazing permit holder and will be maintained to standards. The grazing permit holder may reach out to other agencies or groups to apply for funding on existing improvements.” USFS 2021 Response to Comments at 9. Yet, the Forest Service depends on range improvements, and their ongoing maintenance, to mitigate the impacts of livestock grazing on natural resources within the project area, so it is unclear how these issues are outside the scope of issues the Forest Service should have considered.

The Forest Service’s failure to analyze the fiscal impacts of this proposed project render the NEPA analysis invalid and preclude a FONSI. Given that the Forest Service charges historically low grazing fees (\$1.35/AUM) and the increasingly high costs of administering grazing leases that is never disclosed on an allotment-by-allotment basis, the public is continuously, and apparently intentionally, kept in the dark about the financial impacts of livestock grazing projects. We note that the EA for this project identifies the specific dollar amount recreational permits gross for outfitters for the Salt River Canyon, the specific costs for permits and fees to use the Salt River, and the federal funds generated from those fees. USFS 2021 EA at 103. We are simply asking the Forest Service provide a similar level of fiscal information as it relates to livestock grazing on this allotment. Furthermore, it is important for the Forest Service to accurately and adequately respond to specific requests for information related to the NEPA process and the information regarding how much the proposed range infrastructure will cost is indeed *not* outside the scope of this project, but rather squarely within it.

The Forest Service has not adequately responded to our concerns, has provided no information in response to questions regarding fiscal costs associated with this project, and therefore cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

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 2019 comments at 3-4. The Forest Service’s response is a simple statement that the project complies with federal regulations, misstates that impacts have been “fully analyzed in the EA” and there are no significant impacts. USFS 2021 Response to Comments at 14-15. This response fails to address our actual concern, which is that the Forest Service has failed to look at the 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 the Hicks-Pike Peak allotment. The Forest Service should be engaged in the NEPA process *to determine whether or not to authorize livestock grazing* on these lands. As we stated in our prior comments, 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 existing 1985 Forest Plan, there is nothing in the regulations controlling livestock grazing on public lands that *requires* livestock grazing to be permitted. Furthermore, while continued domestic livestock grazing *may* be consistent with the 1985 Forest Plan goals, objectives, standards, and guidelines, this Forest Plan is currently being revised and is woefully out of date. Reliance on an inaccurate Purpose and Need statement and an outdated determination that the area was perhaps suitable for livestock grazing, has resulted in a failure to take a hard look at the actual impacts of livestock grazing in an ecologically, recreationally, 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. Given the ongoing Forest Plan revisions, the Forest Service's decision for this project must not include any actions that would conflict with grazing suitability determinations, impair Wilderness character, or preclude an area for recommended Wilderness in the forthcoming Forest Plan revision, but here has planned to authorize livestock grazing long into the future, along with industrial scale infrastructure in some of the wildest parts of the Tonto National Forest.

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 or through the sheep driveway without first determining whether doing so is appropriate in light of the ecological conditions on the ground 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 Service has not adequately responded to our concerns and therefore, cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

IV. The Range of Alternatives is Inadequate

We detailed our concerns about the range of alternatives in our prior comments. 2019 WWP comments at 4. The Forest Service failed to respond to our specific concerns.

There is no alternative that would reduce the number of AUMs authorized on the allotment. There is no alternative that would eliminate the use of the driveway by sheep. The Forest Service should have analyzed at least one alternative that eliminated all livestock use of the driveway, including sheep use.

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

V. The Forest Service Should Prepare an Environmental Impact Statement

We identified the legal flaws with the Forest Service’s use of an EA in great detail in our prior comments. WWP 2019 comments at 4-11. The Forest Service responded that according to agency handbooks and direction, they didn’t need to prepare an EIS. USFS 2021 Response to Comments at 2, 8. This necessarily ignores the degraded watershed condition (and indeed, dismissed our concerns about watershed condition by noting the data as “captured at a specific time” – in 2011 – as somehow problematic, *see* 2021 EA at 25) throughout the vast majority of the project area (and required the Forest Service to highlight that the degraded watershed conditions “extend beyond watershed health related to range conditions” and we note not exclusive of range impacts), ignores the fact the Forest Service had to create a lengthy EA (over 150 pages plus additional maps and appendices), and ignores the extreme drought conditions in the region. USFS 2021 Response to Comments at 9-10. It also requires the Forest Service to abdicate its responsibility to protect and improve the conditions of the watersheds and they have failed to explain how adding more livestock grazing to degraded watersheds will improve watershed health, especially in the Sycamore Canyon-Salt River watershed that *is* degraded specifically due to range impacts.

We object to the removal of three key reaches from Table 9. USFS 2021 EA at 31. East Ortega, West Ortega, and Lower Shute Springs reaches were eliminated from the table because, according to the Forest Service, cattle will not be authorized in these reaches. However, the removal of these reaches hides from the public the fact that these reaches have not been assessed for stream condition and yet the Forest Service still plans to allow grazing in these pastures. It also ignores the problem of trespass or unauthorized livestock use and will preclude a future accurate comparison, especially for the public who will rely upon this EA for comparisons to future projects and/or conditions.

The length of this EA alone is a clear indication that the Forest Service is precluded from a FONSI. As noted above, at over 150 pages, not including relevant reports and assessments, this document is a far cry from the concise document described by the CEQ that is required for an EA:

Generally, the EA includes a brief discussion of:

- The need for the proposal
- Alternatives (when there is an unresolved conflict concerning alternative uses of available resources)
- The environmental impacts of the proposed action and alternatives
- A listing of agencies and persons consulted.

There is nothing “brief” about this EA. What the Forest Service has done for this project, as it has done with several other livestock and range infrastructure authorizations in recent years, is attempt to toe the line between EA and EIS, using the shortened time frames and reduced public involvement requirements required by EAs for a project that clearly requires the more in-depth analysis and public oversight and public engagement opportunities found in an EIS. The result is the impacts of livestock grazing on federal public lands and natural resources are never getting the hard look they deserve.

We cited specific examples of our concerns regarding the lack of analysis for this ecologically and culturally important area in our prior comments, including: this allotment is adjacent to and overlapping with the Salt River Canyon Wilderness Area and designated critical habitat for threatened

and endangered species including the narrow-headed garter snake, the yellow billed cuckoo, and the Southwestern willow flycatcher; wells, fencing, pipelines, and other livestock related infrastructure are located within or adjacent to the designated critical habitat and designated Wilderness areas; this project would authorize livestock grazing on 66,838 acres over 18 pastures; a large portion of this range is composed of decomposed granite soil, which is extremely susceptible to erosion; drought has been an ongoing issue for this area; the NEPA history for this project was not properly addressed in the PEA; the legal settlement that prohibited livestock in Ortega and Lower Shute Springs pastures is not included as part of the allotment history; also missing from the history of this allotment is any information regarding an appeal of a decision to authorize 4,200 AUMs, yearlong, which was appealed by a conservation group in 2005 which record indicated the Forest Service identified just 1,217 AUMs *excluding* the Ortega and Lower Shute Springs pastures, and just 1,450 AUMs including the two pastures; there is a lack of NEPA documentation for range infrastructure projects completed with federal and state funds (public funds) in the recent past; two pastures that had been off limits to grazing since 2002 are now mysteriously available to grazing despite past assurances from a Forest Supervisor that they would remain free from the damaging impacts of livestock; water quality concerns have not been addressed, putting public health and safety at risk; air quality issues have not been addressed at all; the unique characteristics of the project area have not been adequately considered; the fact that livestock grazing on federal public lands is becoming increasingly controversial and is scientifically unsupported was ignored; the decision here could preclude more protective management decision that would limit grazing from being made in the Forest Planning process; the proposed range infrastructure will harm scenic integrity (and despite the assurances that non-reflective material will be used, it is likely people will still be able to see the new range infrastructure); the Forest Service ignored impacts from trespass and unauthorized grazing; the required monitoring scheme is aspirational at best and funding sources are not identified; cultural resources are not adequately considered or protected.

For cumulative impacts the Forest Service identified any past range infrastructure as “part of the existing condition” and therefore did not include the impacts of that infrastructure in this analysis. Given that some of the past range infrastructure was installed with little (Categorical Exclusion or EA level) or no analysis, this oversight is yet another reason a FONSI is precluded. While it might be easier for the Forest Service to ignore the significant impacts of livestock grazing and related infrastructure, and ignoring those impacts does make it easier to find no significant impacts, to do so is a violation of NEPA.

The Forest Service has not adequately responded to our concerns and therefore cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

VI. 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 2019 comments at 11-16. 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 the U.S. Fish and Wildlife Service concurrence is based on flawed information, resulting in violations of the ESA.

As one example of the inadequacy of the finding related to the narrow headed garter snake (NHGS), the Forest Service acknowledges that the snake is present in the project area, but not in great numbers. However, the Forest Service never asks the question: why aren't there many NHGS in the project area? Is it due to historic livestock grazing?

For the Southwestern willow flycatcher (SWWFL), the initial determination that the project would affect the species was revisited when the Forest Service modified the grazing to exclude grazing in critical habitat for the SWWFL and some riparian areas. However, this again ignores the need to analyze the impacts of trespass livestock and unauthorized uses because the Forest Service refuses to look at these impacts because it only considers authorized uses in its analysis. This renders the analysis of impacts to this species invalid and precludes a FONSI.

The Forest Service determined that the grazing authorization may affect but would not adversely affect the yellow billed cuckoo (YBC). Again, this determination failed to consider trespass and unauthorized use. We again assert that these oversights, especially cumulatively, preclude a FONSI.

The Forest Service has not adequately responded to our concerns and cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

VII. The Analysis of Impacts to Riparian Areas is Inadequate

In our prior comments we identified flaws with the analysis of impacts to riparian areas. WWP 2019 comments at 16-17. The Forest Service responded to our concerns by stating that “[c]ompliance with the utilization standards identified in the proposed action...should maintain or result in slow improvement of riparian conditions.” USFS 2021 Response to Comments at 2. However, as we noted in our prior comments, enforcement of grazing authorizations is a significant problem and monitoring is unlikely to occur. The lack of enforcement and monitoring render the Forest Service’s assumption that riparian impacts will be slowed or conditions improved invalid and preclude a FONSI.

We also asked the Forest Service to analyze the impacts of the proposed livestock grazing in light of the known impacts livestock grazing in xeroriparian has on riparian areas. Levick et al. (2008, reference provided in 2019) provide a comprehensive review of the ecological and hydrological importance of such systems, which provide important habitat also for many plant species (not just riparian-dependent species), refugia for plants and animals in times of drought (and climate change), a source of water for upland wildlife, and migration/dispersal corridors. Further, the relationship to the riparian and xeroriparian areas to the uplands are a critical component of wildlife habitat in the project area. Upland vegetation is directly related to winter species richness and abundance of avian species. Strong and Bock, 1990. Overgrazing and destruction of grasslands are leading causes of bird imperilment in the southwest. Finch, C. *Ed.* 2005. Livestock grazing has numerous known impacts to uplands, including the effects of range developments on habitat integrity. Fleischner 1994. We noted that this was an issue that was not addressed in the EA and this shortcoming was not remedied nor responded to and again, the Forest Service relies upon monitoring and compliance to minimize the anticipated impacts of grazing on these fragile and important areas.

The Forest Service has not adequately responded to our concerns and therefore cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

VIII. Suitability, Condition, Trend

As we noted in our prior comments, the EA does not address the important issue of range suitability at all, only a reference to the suitability determination from the 1985 Forest Plan. WWP 2019 EA comments at 17. There is no current analysis of suitable range in the EA for each the allotment, nor any updated verification of determinations made in the Forest Plans regarding livestock suitability.

The Forest Service has not adequately responded to our concerns, has provided no information to refute our contention that the suitability determinations are outdated, and therefore, cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

IX. Lack of Adequate Monitoring and Analysis of Livestock Grazing Impacts

As we stated in our prior comments the EA inadequately analyzes the impacts of livestock grazing to native wildlife species that are affected by social displacement due to livestock grazing. WWP 2019 comments at 17. The Forest Service responded by assuring us that this information is included in the Wildlife section of the EA. USFS 2021 Response to Comments at 4. This is not accurate. Social displacement was not addressed at all.

The Forest Service has not responded to our concerns and therefore cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

X. The Analysis of Climate Change Related Impacts is Inadequate

As we stated in our prior comments, there is insufficient analysis of the impacts of the project on the environment *in light of the compounding impacts of climate change*. WWP 2019 comments at 17-18. Examples of the questions we had hoped the Forest Service would ask and answer: given the likelihood of hotter and dryer conditions in the southwest, how will this project exacerbate the already alarming impacts associated with the impacts of climate change on game species, threatened and endangered species, on Management Indicator or Special Status species? How will fencing and other related infrastructure associated with this project further fragment the landscape and how will this impact species already harmed by the rapid on-the-ground changes associated with climate change? How will this affect what the agency considers suitable range for livestock?

These questions have not been asked nor answered. Again, this precludes a FONSI and has prevented adequate public review and comment.

The Forest Service has not responded to our concerns and therefore, cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

XI. Drought Impacts are not Adequately Analyzed

As we noted in our prior comments, information in the EA clearly indicates that the project area has experienced extreme drought in the past, as recently as 2002, which required the Forest Service to prohibit livestock use of this allotment. WWP 2019 comments at 18. Unfortunately, the EA indicates that *at some point in the future* the Tonto National Forest may modify the AOIs to address drought but is not doing so now, as part of this decision, other than to add grazing infrastructure to facilitate a commercial activity on these public lands despite the drought that has made the land unsuitable for such a use. This has a two-fold negative impact. First, the public will have had no opportunity to help frame and flesh out the drought plans or responses; and second, the impacts of the drought are already evident and therefore the Forest Service should be taking action now to prevent further management impacts exacerbated by the drought. This is a significant impact the Forest Service has failed to adequately disclose, analyze, or address. Simply acknowledging that Arizona has been experiencing a long term severe and sustained drought since the 1990s is not the same thing as analyzing the impacts of a livestock grazing authorization that puts cows where they have not been or doubles the number of cows on these already stressed, arid lands. Somehow, the Forest Service believes that by authorizing younger livestock this addresses the concerns related to drought, but the Forest Service has not explained how this is true. USFS 2021 Response to Comments at 2.

One pasture that does not currently have livestock grazing authorized, and that should remain free from the degrading impacts of livestock during prolonged drought, is the West Ortega Pasture. USFS 2021 Response to Comments at 3. Yet the Forest Service chose to ignore those impacts and refused to analyze how livestock authorizations in light of significant drought would harm resources in that pasture.

The Forest Service has not adequately responded to our concerns and therefore cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

XII. Violations of NFMA

The Forest Service has failed to address the watershed health concerns we raised in our prior comments (and address above), though it admits the watershed is in trouble. The Forest Service failed to ask or answer the question: how does authorizing so many cows on these watersheds improve watershed health? The Forest Service blames roads, poor soil productivity, erosion, and mines, while ignoring or minimizing livestock impacts and ignoring the fact that this decision will increase use of roads, create more roads, and fencelines, and will increase erosion and reduce soil productivity. Water developments will concentrate livestock which will further degrade the watershed. This is very likely to result in a violation of the Forest Plan provisions, as outdated as they are, and will be a violation of the National Forest Management Act (NFMA).

The reliance upon outdated information and direction, such as the Allotment Management Plan from 1992, is also likely to lead to a violation of NFMA.

The Forest Service has not adequately responded to our concerns and therefore, cannot rely upon this Decision Notice and Finding of No Significant Impact to authorize livestock grazing.

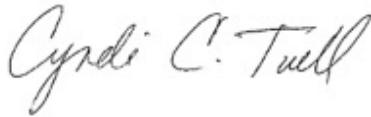
XII. Conclusion

We 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 Hicks Pike Peak grazing and infrastructure authorization via an 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 more than 20 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,

A handwritten signature in cursive script that reads "Cyndi C. Tuell".

Cyndi Tuell
Arizona and New Mexico Director
Western Watersheds Project

ATTACHMENTS

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