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October 21, 2022

Tom Torres  
Deputy Forest Supervisor  
Tonto National Forest  
2324 E. McDowell Road  
Phoenix, AZ 85006

RE: Hicks - Pikes Peak Allotment Grazing Authorization. Contact Information: ([adam.bromely@usda.gov](mailto:adam.bromely@usda.gov))

Tom Torres:

Please find enclosed our objection to the Hicks – Pikes Peak Allotment Grazing Authorization. This objection is being filed in compliance with, 36 C.F.R. Part 218, subparts A and B.

As required by law, this objector provides the following information:

1. These objections were written by Jim Vaaler, whose signature may be seen at the end of this document. Jim Vaaler chairs our Wilderness Committee, is a frequent river runner of the upper Salt, has hiked the Salt River Canyon Wilderness area, and was the lead Sierra Club author for previous comments submitted as described below. The lead objector's address is 514 E. Roosevelt St., Phoenix, AZ 85003.
2. These objections reference the "Hicks – Pikes Peak Grazing Allotment Authorization EA". Adam Bromly is the responsible official for the Globe Ranger District of Tonto National Forest.
3. This objector submitted these objections before the end of the comment period which is October 22<sup>nd</sup>.
4. This objector will provide specific reasons why this decision is being appealed and will also suggest potential solutions for these reasons, if possible.

### **Introduction and Short History**

The Hicks – Pikes Peak Grazing Allotment covers 68,838 acres, all located within the Globe Ranger District of Tonto National Forest. This allotment encompasses significant acreages of the Salt River Canyon Wilderness Area (SRCW) and a large stretch of the Eligible Wild and Scenic Salt River. The allotment has contains important riparian areas which are host to a number of Threatened and Endangered species.

In about 1999, cattle were removed from much of the Salt River corridor in the allotment area due to overgrazing. Removal included cattle on the Shute Springs and Ortega pastures that border the southern part of the River. A year or two later cattle were removed completely from the allotment due to drought. As we understand it, livestock began to be reintroduced in limited numbers in 2004 and in 2006 with a new



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permittee onboard, numbers continued to be increased slowly.

As the previous AMP was written in 1992, the Forest Service has been making efforts at updating it. The Salt River Vegetative Management Plan in 2013 attempted to write an EIS on six allotments that bordered the river included Hicks-Pikes Peak, but abandoned the effort two years later saying that it would be too difficult and expensive to monitor the winter grazing that the plan proposed to occur in the river. A Preliminary EA was written in September of 2017 followed by a second PEA in July 2019 followed by an EA in September of 2022.

Our organization submitted lengthy comments on both your 2017 PEA and your subsequent 2019 PEA and raised many concerns such as high permitted numbers, the suitability of grazing in lower elevation Sonoran Desert areas that included pastures bordering the Salt River, and costly infrastructure proposals and impacts to the river corridor and other riparian areas on the allotment. Below are a few specific objections we would like to make at this time.

### **Statement of Objections**

#### **Lower Shute Springs Pasture**

We object to the Lower Shute Springs Pasture from being used for cattle grazing.

Previously, what is now Upper and Lower Shute Springs was all one pasture. Shute Springs apparently was divided into upper and lower pastures in about 2009, the fence being built just outside the SRCW boundary. The purpose of the fence obviously was to allow grazing in the upper part while keeping cows a good distance from the river and out of the Wilderness. This was not a bad idea as it precluded the need for costly and controversial new infrastructure in the Wilderness and pretty much eliminated the chance that trespass cattle would find their way down to this segment of the river.

Now, however, the proposal is to allow cattle onto the Lower Shute Springs pasture provided a 5 or 6 mile drift fence is built along the river to allegedly protect riparian values and still provide a wilderness experience for river runners and hikers. This drift fence, or riparian protection fence, appears to have been through a few different iterations, one described in the September 2022 EA under “Sideboards for Additional Infrastructure” as being 100 feet from the river. Indeed, on the map in the EA (p. 52) the fence appears to abut the river at the western end of the pasture. Despite Forest Service’s assurances to the contrary, it seems inevitable that the viewshed from the river will be affected and that conflicts involving cattle will occur. Even now, according to a survey done by the Center for Biological Diversity, impacts from trespass cattle have been documented along the river in the past two years.

The remainder of the fence is broken up into six segments in the EA but other than for mileage purposes the reasons for the various sections are unclear. Also, we note in the EA that Lower Shute Springs is to be divided again into an East and West Shute Springs pastures, along with other various infrastructure projects.

The solution to the whole “fence problem” is to simply not graze cattle in the Lower Shute Springs Pasture. The need for this Salt River Fence drift fence and other costly infrastructure projects will simply cease to exist.

## **Ortega Fence Project**

We object to the withholding of information on the part of the Globe Ranger District pertaining to authorizing construction of a fence to divide the Ortega into East and West Pastures and to construct a drift fence in the East Pasture.

Rather than continuing to deal with the Ortega Pasture in the EA, the Forest Service in 2018 issued a Categorical Exclusion and Decision Memo to build these fences, essentially authorizing grazing in a pasture in a wilderness area bordering an eligible Wild and Scenic River. As most of the controversy over the Hicks-Pikes Peak Allotment Management Plan is over the wisdom of authorizing grazing in the Lower Shute Springs and Ortega pastures, the Categorical Exclusion was pre-decisional and violates NEPA.

It appears that while the East/West pasture fence and drift fence in the East pasture have been completed, the drift fence in the West pasture has not. Despite assurances that this pasture would not be grazed until a drift fence was built, the EA states (p. 8) that an emergency authorization was granted in 2020 in lieu of parts of the allotment being affected by the Griffin fire.

It appears the Griffin Fire may have destroyed and/or damaged parts of a “drift fence” on the Ortega Pasture. If this drift fence is damaged or destroyed it would allow cattle to trespass onto the north side of the Salt River in the vicinity of Horse Shoe Bend, and conceivably cattle could find their way up into that part of Cherry Creek located within the Salt River Canyon Wilderness Area. These would now be considered trespass cattle. Please view the video link I have provided of this part of Cherry Creek at <https://youtu.be/pGroDsXC7lo>. The EA admits that, “under the proposed action, the range improvements would be constructed in the one quarter mile river study area in the SRCW and negatively affect the Forest’s ability to preserve the scenic and recreational Outstanding Remarkable Values (p. 104).

Our organization has little faith that drift fences and natural topography will keep cows out of the Salt River corridor. Maintenance of this amount of infrastructure is expensive and never ending. Flood knock down fences and fires burn them up. Some get cut or pushed by cows and others just fall down. Some permittee’s can manage it for a while but eventually they are gone and the next one may not have the resources to keep after it. Inevitably, cows will find their way into the riparian area and degrade the habitat and the old cycle of impacts to species like the southwestern willow flycatcher and yellow-bill cuckoo will continue.

## **Permitted Number of Cattle**

We object to the high number of permitted cattle and lack of clarity in permitted numbers.

The EA permits between 650 to 800 adult cattle yearlong plus 700 to 1100 yearlings for 7 months of the year (EA p. 46). This appears to be about the same stocking level as the 1992 AMP which from what we can tell permitted 850 adult cows plus yearlings. It is difficult to understand with climate change and over 20 years of the worst drought in modern history how permitted numbers can remain so high.

The Forest Service's answer of course is massive, costly water infrastructure projects such as wells, pipelines, stock tanks, troughs, guzzlers, etc., plus endless fences to try to better distribute the impacts. We count about 40 such proposed authorized projects plus blanket authorization to construct additional infrastructure - with a few side rails outlined - if the permittee thinks they are needed (EA pp. 54-57). While no information is available regarding costs to taxpayers for all of this infrastructure, interestingly, the EA does point out the substantial economic impact and fees collected from boating on the Upper Salt (p. 106).

We inquired in our October 2017 comments about what permitted numbers of 650 to 800 adult cattle means - we have not seen an answer. The statement could simply mean that the maximum number is flexible or could be taken to mean that annual operating instructions cannot fall below 650. This is important as AOI's currently are about half of proposed permitted. A doubling of cattle numbers, even with additional infrastructure, seems greatly excessive.

### Conclusion

As we have alluded to previously, this proposal represents industrial scale grazing that is not appropriate for the Tonto National Forest, especially for the Salt River Canyon Wilderness given its importance for Threatened and Endangered Species and associated high values for ecotourism. We appreciate all the work the Forest Service has done but an alternative needs to be devised to minimize risks to the river corridor and make future management an easier task for the agency and permittee alike.

Thanks for the opportunity to participate in the decision making process.

Yours,

Jim Vaaler



Executive Committee Vice Chairperson and Wilderness Chairperson  
Grand Canyon Chapter of the Sierra Club