

Pre- Decisional Administrative Review (hereinafter referred to “Objection”) Process

Objector Lead Objector:

John Fowler

Rockin 4 Ranch

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Prepared by: Rail Lazy H Contracting and Consulting LLC, 28150 N. Alma School Pkwy Ste 103-153, Scottsdale. AZ, 85262.

Name of Proposed Project:

Draft Decision Notice for

Hicks- Pikes Peak Allotment Grazing Authorization

USFS TNF

Globe Ranger District, Gila County, AZ

Responsible Official:

Adam Bromley: Glode District Ranger

Connection statement: A statement that demonstrates the connection between prior specific written comments on the proposed project or activity and the content of the objective.

36 C.F.R. 218.8(d)(6).

Statement: Mr. John Fowler provided comments on multiple Draft Environmental Assessments for Hicks- Pikes Peak Allotment Grazing Authorization including the February 2021 version in meetings and phone calls with the Globe Ranger District and TNF staff personnel.

Objections, including attachments, must be filed via mail, fax, email, hand delivery, express delivery, or messenger service to:

Neil Bosworth, Forest Supervisor

2324 E. McDowell Rd.

Phoenix, AZ, 850006

Fax: 602.225.5295

Description of specific issues: A description of those aspects of the proposed project addressed by the objection, including:

1. Specific issues related to the proposed project if applicable,
2. How the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy:
3. Suggested remedies that would resolve the objection:

4. Supporting reasons for the reviewing officer to consider.

Objections

1. Archeological Clearance: Pg 72 paragraph 4:

All construction, reconstruction, removal, maintenance, and repair of improvements will comply with current Forest direction to protect heritage resources. Archeological clearance must be approved with all necessary consultation with SHPO and the potentially interested Tribes prior to issuing any decision regarding the construction, of all improvements, reconstruction of improvements outside of the existing footprint, or repair and maintenance of improvements away from existing roads or pre-established access. This approach, based on long-term consultation with SHPO and on Region 3 policy as embodied in the First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities between the USDA Forest Service Region 3, the State Historic Preservation Officers (SHPO) of Arizona, New Mexico, Texas, and Oklahoma, and the Advisory Council on Historic Preservation, signed December 24, 2003 (Programmatic Agreement), specifically Appendix H, the Standard Consultation Protocol for Rangeland Management (the Protocol) of the First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities (the Protocol) developed pursuant to Stipulation IV.A of the Programmatic Agreement—is considered to be the "standard operating procedure" for treating potential grazing impacts to heritage resources on the Tonto National Forest.

Objection:

Reconstruction, removal, maintenance, and repair of improvements should not require a new archeological clearance and new consult with SHPO. A prior archeological clearance and consult with SHPO should be on record and available to the applicable TNF staff for maintenance and repairs of an existing improvement. There are no C.F.R's or Forest Handbook guidelines that support this statement available to the public. Furthermore by adding this new requirement, without stating a C.F.R. or Forest Handbook guideline, this new practice would put an undue burden on the permittee by not allowing them to repair or provide maintenance to a fence line or water source, which would result in cattle moving to restricted areas or reducing water availability which would result in death of the animal.

Rocking 4 Ranch requests that this statement/ requirement be reworded to reflect that access to repair an existing improvement would not be delayed by a new requirement of an archeological and SHPO consult.

2. Pg 66; Table 20- Riparian utilization standards are exceeded in key reaches, or insufficient riparian vegetation is present to allow for meaningful (statistically valid) riparian monitoring; Then – Livestock should be removed from the pasture. Areas with insufficient riparian vegetation to allow for meaningful monitoring should be rested until sufficient riparian vegetation is established.

Objection: This "Then" consequences should be removed. Rockin 4 Ranch requests that if Riparian utilization standards are exceeded in key reaches, or insufficient riparian vegetation is present to allow for meaningful (statistically valid) riparian monitoring because of livestock, then fence the riparian area. It is not acceptable for the FS to require removal of cattle to achieve riparian monitoring on an exceedingly small area. We would also like clarification of the term "meaningful" as applied to range monitoring.

3. The use of the terms Viewshed and/ or Foreground in conjunction with referring to the Salt River as an eligible or proposed (draft forest plan) eligible is inaccurate.

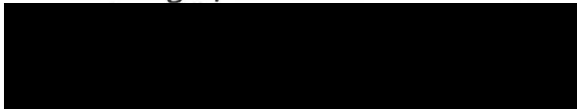
Objection: In the 1980's the Salt River was assessed to be considered as eligible as wild and scenic. This assessment was only an assessment, and no determination was made for eligibility. The current unsigned forest plan is proposing an assessment for eligibility of wild and scenic. [Eligible and Suitable - Wild and Scenic Rivers Program \(U.S. National Park Service\) \(nps.gov\)](#)

Please review the above web link for wild and scenic eligibility. To date none of the steps have taken place to make the terms foreground or viewshed applicable in this draft assessment. Therefore, Rockin 4 Ranch requests all comments and statements referring to viewshed and foreground be removed from this draft assessment.

Yours truly,

Rockin 4 Ranch

Manager/ Member



 John Fowler