

Data Submitted (UTC 11): 10/7/2019 4:03:52 PM

First name: Jeffrey

Last name: Burgess

Organization:

Title:

Comments: Ms. Celeste Kinsey, District Ranger

Sierra Vista Ranger District, Coronado NF

4070 S. Avenida Saracino

Hereford, AZ 85615

Dear Ms. Kinsey,

I am writing to submit comments on the livestock management proposals in the draft environmental assessment (EA) for the Canelo Hills Allotment Analysis.

As with most grazing plans on public lands in the arid Southwest, the most important issue, from the general public's perspective, is the protection of perennial riparian areas from the ecological damage caused by cattle. The EA states the riparian area on the Crittenden allotment is being protected by limiting grazing in it to 30 days during the dormant season - April through November.

It also says the riparian area in Red Rock Canyon on the Kunde allotment is completely excluded from grazing by fences. But your proposed action for the Kunde allotment would allow grazing to resume in the Red Rock pasture that includes this riparian enclosure. It adds that this pasture would only be use during the dormant season. Does this mean that you are also proposing to allow cattle inside the existing riparian enclosure in this allotment? If so, that's a stupid idea. There's no justification for introducing grazing into a riparian area that's already fenced off - probably with fences paid for with public monies.

As for the uplands, the EA explains on page 8 that on the Papago allotment an experiment has been going on. It states:

"This allows for the permittee to run a greater number of livestock than permitted for a shorter time duration while staying below the allowable AUMs."

But short duration grazing schemes, often called HRM, have proven to be inferior in the arid Southwest to conventional grazing management, which relies upon conservative forage utilization levels. On page 14 of the EA it states that:

"The objective is to protect plant vigor, increase herbaceous residue needed for soil protection and to increase herbage producing ability of forage plants. A utilization guideline of up to 45% use of key species in key areas would be used to achieve this objective."

First of all the stated objective is inappropriate for public land. There should also be consideration for protecting the quality of habitat for the allotment's upland wildlife species. Moreover, it sound like it came out of the mouth of a deluded HRM proponent. There's no research that shows cattle grazing can "protect plant vigor," increase "herbaceous residue" on the soil, or increase "herbage producing ability" of forage plants. There is research, however, that shows conservative maximum forage utilization levels of 40% or less are the best strategy in the arid Southwest. This is the number that's widely applied on public lands in Arizona.

Thank you for this opportunity to participate.