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Comments: FS Grazing Management Proposal Comments - FSH 2209.16

CHAPTER 10 - ALLOTMENT MANAGEMENT AND ADMINISTRATION

10 - ALLOTMENT STATUS
"An environmental analysis and resulting decision establishes the allotment boundaries and authorize livestock use and occupancy. The allotment establishment decision may have occurred in the past, however allotment boundaries can be updated at anytime through an environmental analysis."

This would be good if it were the existing situation - but it isn't. I have seen many grazing allotment boundaries significantly altered on Arizona's Tonto National Forest without any NEPA analysis, nor even a NEPA categorical exclusion memo.

10.13 - Forage Reserve Allotments
"Forage reserve allotments are those allotments where a project-level environmental analysis and decision has been made to authorize use of the allotment forage resources on a periodic, temporary, or otherwise short-term planned basis."

What is your definition of a periodic, temporary, or otherwise short-term basis? It seems that without any definite time restrictions that these allotments could become de facto pastures of active allotments.

10.54 - Decisions to Close Grazing Allotments
"Although not required by law or regulation, Agency policy states that an active allotment, forage reserve, or vacant allotment can ONLY be closed through an LMP or a project-level environmental analysis and decision."

"Rarely should allotments be closed for any reason, because a decision to issue or not issue a grazing permit is easier to manage, than adding or removing an area designated at the forest planning level as available to livestock grazing."

The fact that an amendment to an LMP is required to open an officially closed grazing allotment is exactly why that procedure is important and should be retained. It SHOULD be difficult to open a closed allotment to livestock grazing.

11.31 - Display of Rangeland Suitability Determinations in the LMP
"A detailed description of the analysis process used in determining rangeland suitability, and the resulting acreages, must be included in the project record if the analysis is conducted at the LMP level."

A new LMP for the Tonto National Forest is being completed, and Tonto staff have told planning workshop participants that a grazing suitability determination isn't required. This is despite the fact that much of the Tonto is hot and rugged Sonoran Desert that is inherently unsuited for cattle grazing.

17 - FORAGE RESERVES AND CURRENTLY AVAILABLE FORAGE RESOURCES

17.14 - Maintenance of Structural Improvements on Forage Reserve Allotments
"In the absence of a third party agreement (or a volunteer), or a permittee temporarily authorized to make use of the Forage Reserve allotment (and therefore obligated to maintain improvements), the responsibility for

maintenance will fall back on the Forest Service and must be completed to at least the same standards and timeliness required of term permit holders."

Why should the taxpayers be stuck maintaining range improvements on allotments that no rancher is using?

GENERAL COMMENTS

There are many grazing allotment and livestock management decisions identified in the proposed regulations that a Forest Service land manager is allowed to make when there is a "current project-level environmental analysis and decision" for a grazing allotment. There is no definition provided, however, of what is considered a current or appropriate environmental analysis. On the Tonto National Forest I have seen multiple instances where substantive livestock management decisions were made based upon grossly obsolete environmental assessments that were more than 20 or 30 years old. I suggest that any environmental analysis that was completed more than 10 years ago - the term of a grazing permit - should be suspected to be obsolete.

Moreover, important administrative decisions, which include the designation of forage reserve allotments, issuance of temporary grazing permits, reauthorization of grazing on vacant allotments, and temporary authorization of grazing in emergency situations, are made without any public notice when it's determined that an existing environmental analysis is sufficient. These decision letters should be posted to each Forest's website to keep the general public informed about the Forest's livestock management. Information about specific grazing management decisions on our National Forest's should not be restricted to ranchers.