

Data Submitted (UTC 11): 8/3/2023 4:13:54 PM

First name: Mary

Last name: O&#39;Brien

Organization: Project Eleven Hundred

Title: Executive Director

Comments: CORRECTED VERSION OF EARLIER COMMENT (IN WHICH I HAD TRANSPOSED A SENTENCE)

Project Eleven Hundred urges you to adopt Alternative 3 in an Environmental Impact Statement for the following reasons:

1. The Colorado Plateau region is aridifying under climate change, and this allotment is a dry allotment that has proved difficult to support livestock use.
2. Wildlife (e.g., native pollinators, seed-eating birds, small mammals and nesting birds depending on cover for temperature regulation or cover from predators, amphibians) are cumulatively impacted by livestock use in the absence of adequate water and declining production of vegetation amid climate change.
3. Livestock, particularly livestock on open range, emit methane, which is a potent greenhouse gas contributing further to climate change.
4. To move from no livestock grazing to livestock grazing inevitably means significant impacts on water, wildlife, native vegetation, and the climate, requiring an EIS.
5. Reintroduction of domestic sheep would impact the capacity for any future presence of bighorn sheep.
6. Introduction of cattle to a dry allotment in summer season would impact the availability of water for all other wildlife.

The following would need to be analyzed and compared among alternatives in the EIS:

1. Methane emissions in the context of the Social Cost of Carbon (i.e., consideration of the economic well-being of people). If any reference is made to the economic well-being or values of people locally, a comparison with the costs attendant to Social Cost of Carbon and the values of people regarding global warming needs to be made.
2. Trends in vegetation production during at least the past 25 years (e.g., with an NDVI analysis; clip and weigh data on the allotment over the years)
3. Trends in populations of wildlife, e.g., native bees and other native pollinators, amphibians, birds, small mammals), using wildlife data gathered on the allotment, the Ranger District, the Forest, or regionally in scientific literature during recent decades.
4. Assessment of trends of water availability on the allotment, using FS water data or the best available regional assessments of water trends.
5. Trends in sensitive species populations on the allotment/District
6. Trends in drought over the past 25 years, including the megadrought of 2000-2022 (US Drought Monitor archives can provide drought status for every week in the past 25 years)

The potential reintroduction of livestock to an allotment that has no current livestock involves significant impacts cumulatively with global warming (i.e., climate change); contributes to global warming (i.e., climate change); and is not consistent with the responsibility of the Forest Service to insure water availability to all uses on the Forest. This necessitates comparison of the environmental consequences of each of the three alternatives in an EIS.