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Organization:

Title:

Comments: Proposed Forest Plan Comments

April 29th, 2010

Dear Erin Boyle and other members of the Coronado National Forest,

First let me say that the Coronado National Forest is my favorite place in the world, and I have traveled to many countries including tropical destinations. The plant diversity alone within the Coronado is approximately 2200 species, which represents approximately 60% of everything found within the state of Arizona and more than most states within our country. So, I wholeheartedly support the current ten wilderness proposals that are being considered by the CNF. With this being said, it is quite obvious by the lack of consideration of any RNA's or ZNA's that the CNF has little interest in actual preservation or conservation within the district. It is highly disappointing to see the same trend of management continue, with a basic attitude that the CNF is nothing more than a recreation area and giant grazing allotment. Although I support the current wilderness areas, it is unfortunate that the actual designation of wilderness area provides little

actual protection to native species while still allowing livestock grazing in such areas. I authored the two original proposals for the Santa Catalina Mountains (Samaniengo & East Catalina), which have since been changed to wilderness consideration with expanded acreage. Since my area of expertise within the CNF is within the Santa Catalina Mountains, all of my comments will focus on my personal observations and research within that range.

The CNF's current concept of Range Management (p47 of proposed Revised Plan Draft) comments as follows:

"Domestic livestock grazing maintains the desired composition and structure of plant communities. Rangeland ecosystems are diverse, resilient, and functioning within a healthy, sustainable landscape."

To say that the livestock grazing within the CNF 'maintains the desired composition and structure of plant communities' is absolutely ridiculous. I hike regularly throughout the 143,000 acres of grazing allotments in the Catalina's, and am disgusted by the visibly obvious damage that has been done by longterm livestock grazing. It is impossible to say that livestock grazing maintains the composition and structure of plant communities when it is very well documented that most of our grasslands have been replaced by mesquite/acacia scrub lands. Cattle also significantly encourage the spread and population increase of exotic plants, especially grasses. I am constantly removing abundant clumps of Marrubium vulgare (Horehound) from the north side of the Catalina's, as this plant is always found near riparian areas and water tanks that cows frequent. One of the greatest concerns that I have about livestock grazing is the practice of drilling wells

at springs, which has had a significant effect on many of these areas drying out. Groundwater pumping of springs along with longterm drought is having a devastating effect on our riparian communities within grazing allotments. In the most recent "Environmental Assessment: Santa Catalina Mountains Allotments Analysis (7/08)", the CNF speaks of the "need for additional water sources" (p13) for five grazing allotments. There was even mention of the need to drill 5 new wells at springs and re-drill two existing wells to go down deeper. It is even legal to destroy our precious riparian resources within the national forest merely to give non-native species water? Also, who is going to pay for this? Am I paying for this, or are the owners of the grazing allotments paying for this? Two of the springs mentioned are Tule & Nugget Springs. I know these areas very well, and this would cause the surface flow to stop completely, which would wipe out

what's left of existing riparian plant communities and thus have a detrimental effect on native fauna. The fact that the CNF commented on the need to re-drill and deepen two existing wells clearly shows that the water reserves

are dwindling while the water needs for livestock continues. Is this how we will use the last remaining riparian resources on our national forest, for cattle grazing?

Is the CNF actually able to monitor the extensive grazing allotments within its district? Within the Catalina's, I believe that there is only one person who is supposed to monitor 143,000 acres. This is completely unrealistic. I frequently see this when I am out on the rangelands as fences are frequently downed, areas have been utilized way beyond the 'desired' 45% management level, and riparian areas are particularly degraded. At the very least, the cows should not be allowed in riparian areas. Does anyone from the CNF ever conduct nitrogen or ammonia tests at springs/streams where grazing occurs, as the cows frequently defecate in the water? I doubt that there is the manpower or money for this. There is also the issue of the increased salinity levels of soils in certain areas that are overgrazed and where salt licks are introduced. It is well known that cow dung is extremely high in salt, and our soils are already rather saline to begin

with. Essentially, the ranchers who hold these grazing permits are getting a free ride at the expense of native plant & animal communities with the CNF. Do the ranchers have to pay for construction and reconstruction of the fences? The actual cost being paid per cow per month is absurd. Has the CNF considered raising this cost by 5-10 times to generate more money to go towards conservation? The holders of the grazing allotments consistently abandon infrastructure from stock tanks, water piping, concrete structures and essentially litter the once pristine landscape with their trash. When I go hiking, I am not allowed to litter and leave all kinds of waste products. There are literally hundreds and hundreds of feet of abandoned piping (metal, pvc, rubber) covering the grazing allotments. This is distasteful and disrespectful to our public lands. Are these the type of people that you give these special considerations to? Why are they not

required to spend a little bit of extra time and work to clean up their mess on our national forest? Currently, I am amassing GPS coordinates and photographs of all of these eyesores. Also, I am extremely concerned that all of the grazing allotment & inspection information on the CNF website has not been accessible for several years now. I would really like to see this information as it is supposed to be public access. It would be a lot cheaper for the CNF to stop livestock grazing, as well as healthier for our national forest. It is extremely unfortunate that cows are one of the most protected species with the national forest, more so than mountain lions and bears who often meet unfortunate ends when attacking these introduced animals.

In regards to the proposed Samaniengo Wilderness area, I discovered the largest population of *Potentilla albiflora* (White cinequell) within the Catalina's at the headwaters of the CDO last summer (after submitting my proposal). This plant is extremely rare and only known from several localities within the CNF. This area is highly deserving of special designation and is very remote and lush. On both of the Catalina proposals, the plants listed are highly inaccurate. I would be happy to provide basic plant lists for both areas if you are interested. Because of the language expressed within both proposals, it does not appear that the CNF is interested in creating conflicts with existing grazing and also does not consider either of these areas to be of 'high value'. I highly encourage you to consider special classification for both of these unique areas. Conservation within the Catalina's is absolutely essential, as this is the largest

mountain range within close vicinity of a major city within our state and has seen great impact over the years. Please do not write off the remaining natural resources of the Santa Catalina Mountains. My floristic research currently shows 1,439 taxa of plants from the Catalina's - which represents almost 70% of everything found within the CNF (boasting the greatest diversity of any sky island in our area).

Although I have strong concerns about the management practices of the CNF, I respect the individuals that work for this agency and am aware that there are many good people who are trying to make a difference within their positions. I would be happy to assist the CNF in any way possible with efforts to protect and preserve our precious national forest. Thank you very much for your consideration.

Sincerely,  
Jim Verrier, botanist  
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