Data Submitted (UTC 11): 1/29/2020 7:00:00 AM
First name: Jeff
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Organization:
Title:
Comments: 1. Intense floods are a natural disturbance of desert riparian areas, and with climate change, their intensity and frequency is likely increase. Can you please add a guideline to establish a minimum number of years a stream will be totally rested from grazing after it's damaged by a flood? (There are grazing rest guidelines for recently burned areas.)

2. Can you please add a requirement that grazing will not be allowed in pastures where riparian fences have been destroyed by floods until the fences have been repaired?

3. Why have you abandoned upland forage utilization guidelines? They were established, based upon scientific research, for a reason. Has that reason gone away?

4. Why are you proposing to increase allowable riparian utilization guidelines? Why should cattle be allowed to use riparian areas to the extent that they need time to "recover" afterwards?

5. What was the origin of the existing riparian guidelines?

6. Why is there is no mention in the DRMP or Volume 1 of the DEIS of the proven effectiveness of riparian exclosures, such as the Tonto Creek Riparian Unit or the Sycamore Creek Riparian Pasture, in protecting riparian areas from cattle. In fact, the DRMP states that riparian restoration efforts should not "focus" on maintaining exclosures.

7. Do you have any monitoring results that show where an overgrazed riparian area was able to recover to full health simply by building new livestock waters in the surrounding uplands?

8. Can you please add a standard that states riparian areas will not be considered a significant source of livestock forage in allotment management plans?

9. Why is there little discussion of grazing strategies during droughts, which are likely to occur more often and be more intense due to climate change? Will the primary objective be to keep as many head on the land as possible?

10. Why wouldn't it be "useful" to see a list of the currently closed grazing allotments, since the DRMP proposes to keep them closed? I understand that creating a map of the closed allotments would be laborious, but a simple list which names them and shows the districts in which they are located should take little effort.

11. How can you propose to assess vacant allotments for grazing suitability at the project level now, when your staff have been claiming for years that such decisions must be done at the Forest Plan level?

12. What are the criteria that will be use to assess vacant allotments? Will it be more than just whether or not there's a rancher interested in obtaining the permit? Will NEPA be engaged?

13. What will trigger a full NEPA assessment, versus NEPA categorical exclusions? At what point will the construction of new livestock waters and fences constitute the implementation of a new management plan requiring NEPA analysis? (DEIS Volume 3, pg10*)

14. Since project level planning is the mechanism for the DRMP's implementation, then public involvement at the

project level is essential. How is the public supposed to know what's going on with livestock management on the Forest if NEPA is minimized and adaptive management is implemented with few S&G sideboards?

15. Can you please post all of the AOIs for each allotment online each year?

16. Why are riparian areas separated in the DRMP between Riparian Ecological Response Units (RERU) and Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones?

17. Since the Reading the Range upland monitoring data is being used adjust grazing management of the Forest, why isn't it publicly available? (Riparian photo points are available online.)

18. Why doesn't the estimated economic value of livestock grazing on the Forest subtract the cost of the public having to subsidize the Forest's ranching operations with EQIP grants, and LFDP and other drought related payments? (DEIS Volume 1, pg177)

19. Why doesn't the DRMP include a provision to prohibit high-intensity, short duration grazing, also called HRM, since scientific research has shown these types of livestock management schemes don't work and cause damage in the arid Southwest?

20. What is a riparian "restoration" project?

21. What does it mean to "improve or maintain" springs?

22. Can you please add a guideline requiring livestock waters to remain "on" to benefit wildlife even when cattle aren't in the pasture?

* Resource Assumptions and Methods, Rangelands, Forage, and Grazing: Most of the active grazing allotments have been assessed for resource conditions and undergone NEPA analysis to balance permitted livestock numbers with available forage production and to maintain or move toward desired conditions. Management and monitoring are being used to maintain and improve the rangeland resource.