

**DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
YOUNGS CANYON GRAZING ALLOTMENT
ENVIRONMENTAL ASSESSMENT
PEAKS RANGER DISTRICT
USDA FOREST SERVICE
COCONINO COUNTY, ARIZONA**

DECISION

It is my decision to implement Alternative A for the grazing strategy, range improvements, wildlife habitat improvements and watershed improvements for the Youngs Canyon Allotment. Any and all grazing practices adopted will be further detailed in the terms and conditions of an allotment management plan and grazing permit.

On December 12, 2000 I issued a Decision Notice and Finding of No Significant Impact for this project. The decision was appealed. The Appeal Reviewing Officer concluded all of the major issues raised by the appellant were adequately addressed in the Environmental Assessment (EA), with exception of the cumulative effects analysis related to pronghorn antelope. This analysis was finalized and added to the administrative record after the EA was sent out for public comment. The information was therefore considered by the decision maker but not disclosed to interested publics. The Regional Forester reversed the decision with instructions to disclose the cumulative effects analysis in the EA and provide for notice and comment (another 30-day formal comment period).

The cumulative effects analysis information was added, and a new EA was made available for formal 30-day comment period on March 29th, 2001. Appendix A to the EA (attached) provides a response to those comments. For this decision, I considered comments received during the entire analysis process.

The Youngs Canyon Allotment consists of 10,365 acres southeast of Flagstaff, Arizona. These acres lie in the southeastern portion of the Peaks Ranger District of the Coconino National Forest. The allotment lies south of Interstate 40 just south of Winona, Arizona. The Youngs Canyon Allotment is located within all or portions of T21N, R9E, Sections 13-15,21-36; and T20N, R9E, Sections 1-4,10-12.

REASONS FOR THE DECISION

Alternative A is described below. Alternative A provides many of the changes needed for this area. The length of graze will reduce a cow's ability to re-graze plants. The reduced number of days that cattle graze will improve forage conditions. The four pasture deferred system allows each pasture to be rested longer each year than current management. Treatments will occur on approximately 5,322 acres of the allotment. These treatments maintain grassland landscapes important to antelope and other grassland adapted species. Treatments within densely forested pinyon juniper area will provide interspaces with greater understory ground cover to help limit erosion. Removal of pinyon/juniper trees as described under Alternative A will enhance winter browse shrubs such as cliffrose that are important to wintering deer and elk. The cost of the new

trick tank and cutting is reasonable and will provide long-term benefits to the area. The actions of Alternative A will progress towards better production, diversity and vigor of understory plant species and maintain a mosaic of treed areas, small openings and large natural grasslands.

The best alternative overall, for progressing toward the project objectives, is Alternative A. Project objectives are: maintaining or improving watershed and soil condition; moving toward or maintaining a desired plant community; improving forage production in some of the more densely treed sites and sites of current low forage production; allowing livestock grazing with consideration of identified resource and social needs for the Youngs Canyon Allotment and the surrounding communities.

I read various letters that raised concerns over this project, but read no comments that caused me to change Alternative A. There is adequate research and knowledge available to show us what actions should be tried in reversing deleterious trends. Any increase in understory vegetation quality or quantity that results from pinyon and juniper treatments is done for the purpose of watershed and wildlife habitat enhancement. It is not our purpose to increase capacity for grazing livestock through vegetation treatments. Rather a combination of changing grazing practices, along with vegetative treatments can restore and maintain healthy watershed conditions in the Allotment.

I understand concerns about the Anderson Mesa antelope herd. For the few antelope that reside or pass through on the Youngs Canyon allotment, there will not be significant negative effects. On the contrary, Alternative A increases habitat availability and progresses towards better plant conditions over time.

While improving watershed conditions and wildlife habitat, Alternative A provides for a viable ranching operation that meets resource management needs.

My decision to select Alternative A is based on a consideration of the area's existing resource conditions, desired conditions, public concerns and the environmental effects of implementing the various alternatives. When making this decision, I considered the Environmental Assessment and all documents located in or referenced in the Project Record for this analysis. I also considered all public comments received during the life of the project, the Forest Service mission, regulations and policies.

The Youngs Canyon Allotment is scheduled for environmental analysis of grazing use on the Coconino National Forest, as required by the Burns Amendment (1995).

ALTERNATIVE A - SELECTED ALTERNATIVE

Below is a brief description of Alternative A. Additional detail is located in the Environmental Assessment (EA). Alternative A will,

- Permit grazing for up to a ten-year period. The exact length of the permit will depend on the permittees ability to properly manage the allotment.
- Remove the Walnut Canyon National Monument portion of the Youngs Canyon

Allotment (approximately 510 acres) from the carrying capacity of allotment. Grazing of this area will continue through 2001 when the National Park Service plans to build their boundary fence.

- Maximum cattle numbers is 90 to 110 head of steers or 51 to 63 head of cows/calf's, from 5/15-10/31, using a four pasture deferred rotation grazing system. These cattle numbers are based on past stocking rates and carrying capacity estimates. Graze periods in each pasture is approximately 46 days each year.
- Assure 35% forage use standard is met for cattle and elk. Key areas monitoring points will be established within the allotment. Reduce cattle numbers or season of use to meet these use standards, if needed.
- Rehabilitate the Youngs Canyon holding pasture. Change cattle use from continuous use to 15 days per year. Shape sheer channel banks. Plant western wheatgrass.
- The Parker Three Step Clusters, frequency and canopy cover plots were done at existing Parker Three-Step Clusters sites in December 1999. Additional frequency plots will be established in areas of concern or in areas where changes in trend is expected or needed. At least two additional frequencies, canopy cover and ground cover plots will be established within impaired soil sites.
- Cut approximately 5,322 acres of pinyon and juniper on the allotment, see Map.
 - Previous cleared pinyon and juniper areas (approximately 1,140 acres) will be cut to reduce young (less than 30 years old) pinyon and juniper trees and to reduce rabbitbrush. These previously cleared areas exist in the central and western portions of the allotment and vary from 20 to 300 acres in size. These sites are mostly irregularly shaped and linear. The desired conditions for these alluvial bottoms are managed for a diverse grass and shrub community. This will maintain and improve forage conditions for cattle, elk and antelope.
 - Young pinyon and juniper trees (less than 80 years old) will be cut from approximately 2,240 acres on the northeast corner of the allotment. We will be avoiding cinder hills, Youngs Canyon, an electric substation and 100-acre patch of old trees. This will create two approximately 1100 acre irregularly shaped patches of open savanna like grassland. Scattered individual and clumps of trees (the largest trees available) will be scattered across this landscape to create this open savanna like grassland. This treatment will maintain and improve forage conditions for cattle, elk and antelope.
 - On old fuelwood cuts, pinyon and juniper trees will be cut from the southeast corner of the allotment on approximately 880 acres. These cuts will be patches ranging from six to 600 acres in size and irregularly shaped. No trees will be cut over 12 inches in diameter. Openings will not exceed four acres. The residual condition will be a moderately forested pinyon and juniper woodland with emphasis on improving conditions for cliffrose, with all age classes of pinyon and juniper present. This will

maintain and enhance habitat for wintering deer herds.

- On previously untreated areas, young pinyon and juniper trees will be cut from the southeast corner of the allotment on approximately 1,062 acres. These cuts will be patches ranging from seven to 20 acres in size and irregularly shaped. No trees will be cut over 12 inches in diameter. Canyons and steeper slopes will be avoided. Openings will not exceed four acres. This will create a moderately forested pinyon and juniper woodland with all age classes of pinyon and juniper present. Treated areas will retain the majority of larger and older trees. This will look different from the surrounding areas because there are older trees in these areas. The emphasis for this treatment will be to improve conditions for cliffrose. This will maintain and enhance habitat for wintering deer herds.

- In all treatment areas, approximately 3-5 tons of tree slash will be left on the ground for nutrient cycling, soil stability, small mammals and birds. The cost of cutting and burning in the areas of young trees will be approximately \$30 per acre of a total of approximately \$160,000. An estimated additional cost of \$44,800 will be needed to complete archeological surveys in these areas. The Forest Service will conduct these projects.

- A trick tank drinker system will be built near Youngs Canyon Dam. This system will provide water to all four pastures.
- If road funding becomes available, a low water cross will be built where Forest Road 128 crosses Youngs Canyon at the old Youngs Canyon Dam site. This crossing would stop erosion at the dam site.
- Noxious weed inventories and treatments will be needed on the allotment over the next 10 years. Populations of scotch thistle, diffuse knapweed and other potential noxious weeds will be pulled, cut, mowed, dug or burned before seed set to reduce future spread of these species. Competitive species will be seeded around disturbed sites where needed. Special attention will give to all new disturbance areas including burning.
- We will continue on-going elk/cattle monitoring effort and additional condition and trend monitoring.
- Maintenance will be done on all new and existing structural improvements including barbed wire fences, trick tanks, stock tanks and drinkers, as needed by the permittee. The bottom wire of new fences will be smooth and be a minimum height of 18 inches to facilitate pronghorn passage.

Prescribed fire will be used in two ways as follows: 1) fires could be used as a tool to remove small trees within previously cleared pinyon and juniper areas. These range from 20 to 300 acres in size and most will be treated by hand or mechanical tree removal but some may be burned to remove the small trees, 2) fire will be used to remove slash in those places where slash is too heavy. In the old fuel wood cuts (880 acres) and the previously untreated areas (1,062 acres) there may be places where slash is greater than 10 tons per acre. In this case, the slash may be

burned. Slash would either occur in piles or be lopped and scattered. We estimate only 200 acres or so may need prescribe fire to remove excess slash.

This decision approves the actions described in Alternative A; however, all the actions described will not be implemented at one time. This decision sets the stage for management of the area over the next 10 years. During that time, we will implement blocks of acres of pinyon and juniper treatments as funding becomes available. Prior to each year's implementation, appropriate cultural resource surveys, and other layout and design features will be applied. Implementation will be coordinated with local researchers minimize impacts to research plots. Smoke management will be considered prior to ignition of prescribed burning along with many other factors. Site-specific burn plans will be developed and implemented. The entire text of letters received is located in the project file

OTHER ALTERNATIVES CONSIDERED

Below is a description of the alternatives considered in this analysis and why I did not choose Alternatives B, C or D.

Alternative C is the grazing system currently in place with no additional improvements or any pinyon and juniper treatments. Maximum cattle numbers is 42 head yearlong using a four pasture rest rotation grazing system. Graze periods in each pasture is approximately 120 days each year. Trend for the Youngs Canyon allotment is static under Alternative C. There are approximately 570 acres of the allotment in unsatisfactory condition as a result of past activities. These alluvial bottoms lack vegetation and ground cover and exhibit surface and small gully erosion. In other portions of the Allotment, pinyon and juniper trees have increased in density and number at the expense of herbaceous and shrub understory. Dense trees in these areas often leads to little ground cover resulting in erosion from wind and water. There will continue to be a lack of water for cattle and wildlife in the Youngs Canyon Dam area with this alternative.

Alternative D is a four pasture rest rotation grazing system with maximum cattle numbers of 70 to 83 head of steers or 38 to 47 head of cows/calf's from 5/15 to 10/31. Graze periods are approximately 56 days each year. This alternative provides yearlong rest on one pasture every four years. The same 35% utilization standard, trick tank, pinyon and juniper cutting/burning, noxious weeds inventory and monitoring, mitigation and monitoring, described in Alternative A, are part of Alternative D. The environmental analysis has demonstrated that Alternative D is slightly slower to improve ecological conditions than Alternative A. Because Alternative A best meets the biological, social and economic objectives, I am choosing Alternative A.

Alternative B was the no-action alternative in which cattle would be removed from the Youngs Allotment and where structural improvements would not be maintained or improved. No pinyon/juniper treatments occur under this alternative. Investments made previously in structures would be lost as they decayed over time. Water sources maintained by the permittee benefit wildlife as well as cattle and these water sources would no longer be maintained by the permittee. The environmental effects show faster increases in range conditions over the next 10 to 20 years, but long term declines in the next 20+ years under Alternative B. The differences in the rates of improvement are slight between Alternatives A and B. Therefore I have chosen Alternative A over Alternative B.

PUBLIC INVOLVEMENT AND SCOPING

Consultation and public involvement on the Youngs Canyon Allotment was sought in 1999 and 2000. This project was listed in the Coconino Forest's Schedule of Proposed Actions (SOPA) on February 14th, and all subsequent issues. The SOPA is mailed quarterly to a list of over 500 addresses and it is published on the Coconino Forest's website. A Proposed Action was mailed to a mailing list that included individuals, organizations and a variety of State and local agencies. The Environmental Assessment was mailed to individuals, groups or agencies that expressed interest by responding to the Proposed Action or the SOPA. Notice of the formal comment period on the Environmental Assessment was published in the *Arizona Daily Sun*, on October 17, 2000. All comments received during the analysis were considered in this decision. Additionally, in response to request for additional review, the environmental documents were made available to interested people.

On March 29th a new EA was made available for public comment. The EA was mailed to those who had provided previous comment or expressed interest in the project. A letter stating that the EA was available was mailed to the original list used for the Proposed Action. A few people called to request a copy of the EA. In addition, the EA was posted on the Coconino Web site. A copy of this Decision Notice will be mailed to all commenters.

FUTURE NEPA ACTIONS

The Environmental Assessment will guide any subsequent project implementation related to cattle management and the actions described in Alternative A for the Youngs Canyon Allotment. Future site-specific project proposals will be tiered to this Environmental Assessment (40 CFR 1508.28). Tiering means that, if needed, future environmental documents for projects based on this document will summarize or incorporate by reference the issues discussed in this analysis. Environmental documents for those projects will focus on site-specific issues unique to the proposed project.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Context. This project is a site-specific action that by itself does not have international, national, region-wide or statewide importance. The discussion of the significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the Youngs Canyon Allotment.

Intensity. The following discussion is organized around the Ten Significance Criteria described in the National Environmental Policy Act (NEPA) regulations (40CFR 1508.27).

1. The analysis considered both beneficial and adverse effects. Impacts from this project are both beneficial and adverse. The adverse effects are short term in nature and will not impair land productivity. The long-term effects are considered to be beneficial especially for elk, deer, and antelope habitat and rangeland conditions. The EA contains a complete discussion of the effects in *Chapter 3*.

2. There are no known adverse impacts to public safety. The intended action will not effect public health and safety. As stated in the *Items Common to All Action Alternatives* section in *Chapter 2* of the EA, standard forest service requirements will be used for pinyon/juniper treatments, prescribed burning, fence maintenance, trick tank construction and other activities.
3. No unique characteristics of the geography, such as cultural resources and wetlands, will be adversely affected. The Youngs Canyon Allotment is located adjacent to Walnut Canyon National Monument and the effects on this area are the same as the effects discussed in *Chapter 3*. There are not any other parklands, prime farmlands, wetlands or ecologically critical areas. Cultural and historical sites on the allotment and will be avoided by ground disturbing activities. A cultural resources clearance report is complete with concurrence from the State Historic Preservation Officer (SHPO). *Chapter 1* of the EA describes the location and existing conditions of the Allotment.
4. The effects on the quality of the human environment are not likely to be highly controversial. The effects of the project are limited to the Youngs Canyon Allotment. While some people have disagreed with cattle grazing, pinyon/juniper treatments or prescribed burning in general, or the type of treatments described in the preferred Alternative A, no person has provided evidence that the environmental effects of these activities have been wrongly predicted; therefore the effects are not likely to be controversial. *Chapter 2 and Appendix A of the EA discuss comments received during this analysis.*
5. The degree of possible effects on the human environment are not highly uncertain, nor are there unique or unknown risks involved. The environmental effects are typical of cattle grazing, pinyon/juniper treatments on the Coconino National Forest. The adverse effects will be short term and involve no unique or unknown risks. Effects are discussed in *Chapter 3* of the EA.
6. Site specific actions found as part of this decision do not set a precedent for future actions, which may have significant effects, nor does this represent a decision in principle about a future consideration. A decision to issue a permit for cattle grazing under the chosen grazing system and cattle numbers, or to implement the pinyon juniper treatments, does not establish any future precedent for other actions that may have a significant effect. Future actions will be evaluated through the NEPA process and will stand on their own as to the environmental effects and project feasibility.
7. These actions are not related to other actions that, when combined, will have significant impacts. Cumulative effects are documented in *Chapter 3* of the EA. In the *Cumulative Effects* section, the Canyon Diablo and Lake Mary 5th code watersheds are reviewed for actions and their anticipated effects such as timber activities, roads, livestock grazing, wildfire, recreation, State lands activities, highways, and private lands activities. In addition, the *Wildlife* section of *Chapter 3* addresses cumulative effects to wildlife.
8. This decision will not contribute to the loss or destruction of significant scientific, cultural, or historic resources. The Project Record contains cultural resources clearance reports and concurrence from the State Historic Preservation Officer.

9. This decision will not adversely affect any threatened or endangered species of plants or animals or habitat critical for the management of these species. A biological assessment and evaluation was completed for this project. The findings include a “may impact individuals” for Navajo Mountain Mexican vole, American peregrine falcon, Rusby’s milk vetch, northern goshawk, Mt. Dellenbaugh sandwort, early elfin and Flagstaff penstemon, and a “no impact or a no effect” to black footed ferret and bald eagle. The allotment does not contain habitat for Mexican spotted owls. A summary of effects is located in *Chapter 3* of the EA.

10. This decision does not violate or threaten to violate Federal, State, or local laws, or requirements imposed for the protection of the environment. The local city and county governments were provided the proposed action and did not respond with any comments or concerns.

I find that implementing Alternative A does not constitute a major Federal action that would significantly affect the quality of the human environment in either context or intensity. I have made this determination after considering both positive and negative effects, as well as direct, indirect and cumulative effects of this action and foreseeable future actions.

I have found that the context of the environmental impacts of this decision is limited to the local area and is not significant. I have also determined that the severity of these impacts is not significant.

OTHER FINDINGS

This decision meets the intent of and complies with the Coconino Forest Plan.

The Decision complies with relevant laws, including but not limited to the following; the Clean Air act as amended; Protection of Wetlands Executive Order 11990; the Safe Drinking Water Act; the National Historic Preservation Act of 1966 as amended; the Archeological Resources Protection Act of 1979; the Native American Religious Act; the National Forest Management Act of 1976; and the National Environmental Policy Act of 1969.

Biological evaluations are complete. Cultural Resources Clearance and consultation with the State Historic Preservation Officer are complete.

The Decision also complies with Arizona State laws regarding natural resource protection, including but not limited to water quality, air quality as well as county and city resource protection measures.

EFFECTIVE DATE AND IMPLEMENTATION

This project will not be implemented sooner than five business days following the close of the appeal filing period established in the Notice of Decision in the *Arizona Daily Sun*. If an appeal is filed, implementation will not begin sooner than 15 calendar days following a final decision on the appeal. Although the policies will take effect at that time, I expect that the actual on-the-ground implementation will be phased in over the next 10 years.

ADMINISTRATIVE REVIEW

This decision is subject to administrative review pursuant to 36 CFR 215 and 251 (251 for permittee's only). For 215 and 251 a written notice of appeal must be filed with Regional Forester within 45 days of the date that a notice of this decision is published in the *Arizona Daily Sun*. A notice of appeal must be fully consistent with the requirements found in 36 CFR 215 and 251. At a minimum a written notice of appeal must include the following:

- State that your appeal is filed pursuant to 36 CFR 215 or 251.
- Provide your name, address and telephone number.
- Identify this Decision Notice by its title.
- Identify the decision or decisions you wish reviewed.
- State the reasons for your objections, including issues of fact, law, regulation, or policy, and if applicable, specifically state how the decision violates law, regulation, or policy.
- Identify the specific change or changes in the decision that you seek.

A notice of appeal may include a request for stay to keep the decision from being implemented. A request for stay should provide the following information:

- A description of the specific actions to be stopped by the stay.
- Specific reasons why the stay should be granted. This should contain sufficient detail to permit the Reviewing Officer to evaluate and rule upon the stay request. At a minimum you should discuss the specific adverse effects of implementation upon you; harmful site-specific impacts or effect on resources in the area affected by the activity or activities to be stopped; and how the cited effects and impacts would prevent a meaningful decision on the merits of the appeal.

Appeals must be filed with the Regional Forester, Southwestern Region, 517 Gold Avenue SW, Albuquerque, New Mexico 87102, Attention Appeals Contact Person.

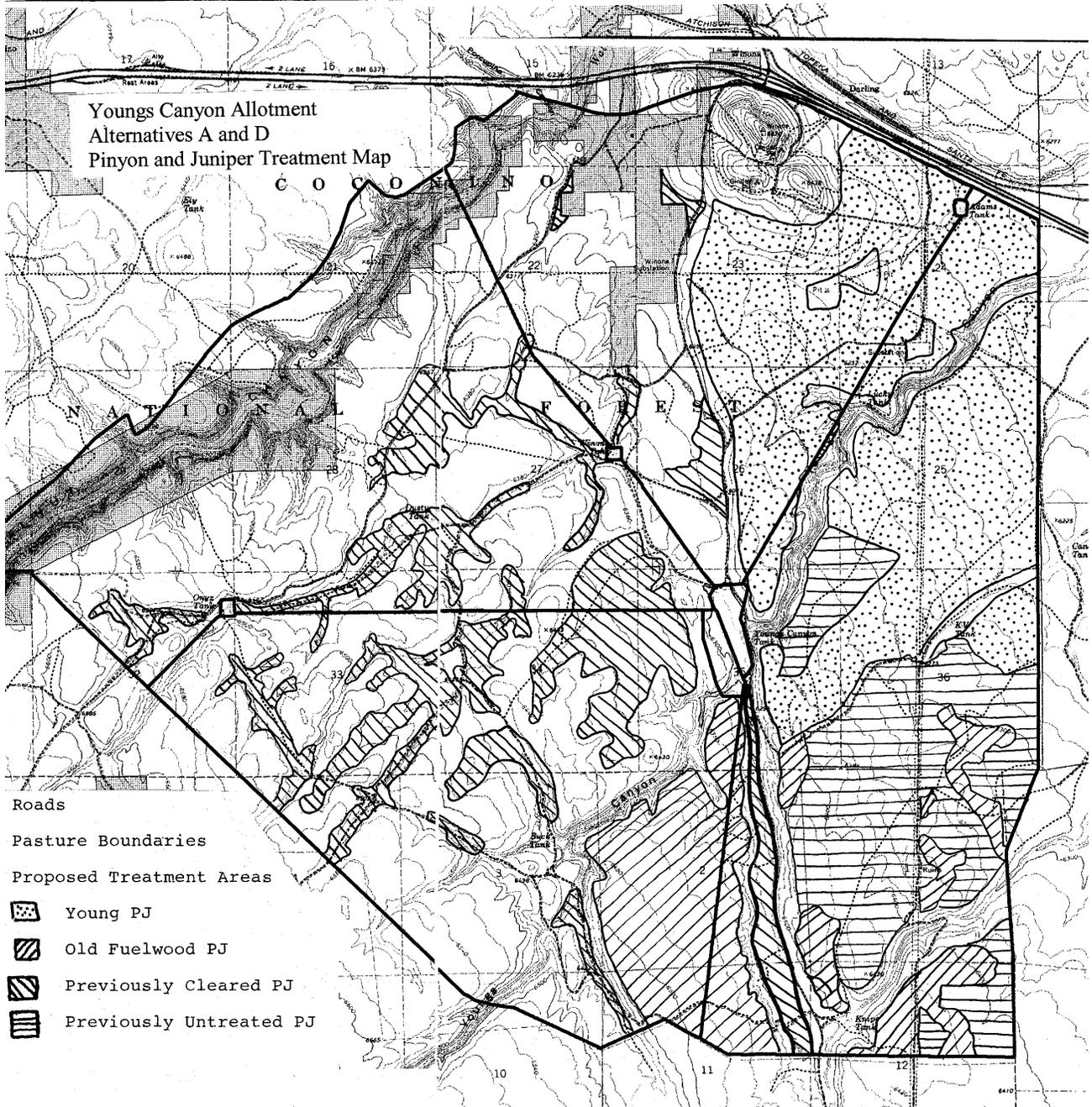
For further information, contact myself or Mike Hannemann at the Peaks Ranger District.

/s/ Gene Waldrip

7/23/01

Gene Waldrip
Peaks District Ranger
Coconino National Forest

Date



APPENDIX A

On March 29, 2001, the Youngs Canyon Environmental Assessment (EA) was put forth for a formal 30-day comment period for a second time. The first edition of the EA was revised and a new EA was made available for comment. Per 36CFR 215, this document summarizes comments received during the formal 30-day comment period of the second EA only. Representative paragraphs are displayed here in regular type and the response is in italics. The entire letters are located in the project file.

Jeff Burgess letter dated April 12, 2001

Comment #1 Unfortunately, as was also the case in the first EA, the alternative you've labeled as the current management alternative, Alternative C, is a situation that hasn't existed on the allotment for five years.

One of the claims made in the EA is that your proposed action, Alternative A, represents a 31% reduction in livestock over the current grazing permit. This is misleading as it suggests the implementation of your proposed action would result in a reduction in the number of cattle grazing the allotment.

Response #1 *Alternative C represents the current permit. Adjustments in numbers can and have occurred within the permit. Changes are done through the Annual Operating Instructions.*

Alternative A represents a 31% reduction in livestock over the current grazing permit.

Alternative A represents little reduction in livestock over the numbers that have been using the allotment in the past few years. We have tried to make this clear in the EA. This does not change the reasons for identifying Alternative A as the preferred alternative.

Comment #2 The biggest difference between the current situation and your preferred alternative is the proposal to spend \$160,000 to thin pinyon and juniper on 5,322 acres of the allotment to increase forage production, and another \$13,000 to construct a livestock watering device. ... It seems clear to me that one of your primary objectives is to increase the production of forage available for livestock. ... you present the old, often repeated argument, that pinyon and juniper invasion is akin to ecological degradation. It sounds good. But the problem is that there's little research to support these theories. In fact, the research shows the biggest effect of pinyon/juniper invasions is that the vegetative community and its associated animal species, change from what they used to be (Belsky 1996). This is only a "problem" when humans apply their personal values to the land. Like, for instance, when they want more forage for their cattle. ... I suggest you seriously consider implementing an alternative whereby the permitted stocking rate is lowered so that the taxpayers don't have to pay so much for the removal of woody vegetation and livestock watering

Response #2 - *Page 6 of the EA states that any proposed increases in understory vegetation quality and quantity is done for watershed and wildlife habitat reasons. It is not our purpose to increase capacity for grazing livestock through vegetation treatments. The values applied to this landscape include the perpetuation of antelope habitat and the enhancement of watershed conditions. Our actions progress towards desired conditions outlined in the Forest Plan. Capacity for all alternatives is based on existing forage, not possible future forage.*

The suggestion that another alternative be evaluated where the permitted stocking rate is lowered so that the taxpayers don't have to pay so much for the removal of woody vegetation and livestock watering seems to be based on the assumption that there is a direct connection between livestock grazing and the vegetation treatments. As discussed above, this is not the case.

The cost of improvements to a water tank is directly connected to livestock grazing on the allotment. The cost will be partially covered by the permittee and partially covered by the Forest Service. This water source would still be necessary, even if fewer cattle used the area.

This comment does not change the outcome of this analysis or the preferred alternative.

Comment #3 - Will the pasture rotations be dictated by compliance with this (35%) utilization limit, or by timing?

Response #3 - *Pasture rotations are dictated first to the 35% use limit, then to the days planned in each pasture.*

Comment #4 - Will the permittee be required to remove cattle from the allotment if 35% utilization has been achieved on all pastures before the end of the permitted grazing season?

Response #4 - *Yes the permittee will be required to remove cattle from the allotment if 35% utilization has been achieved on all pastures before the end of the permitted grazing season*

Another postcard was received from Ed and Amelia Jaskulski asking to be removed from the mailing list for this project.

A third letter was received from Michael George with the following points:

Comment #5 - I'm not in favor of livestock grazing on public lands.

Response #5 - *This opinion has been analyzed in the Alternative B – No Grazing*

Comment #6 - I do not feel at all comfortable with your prescribed burning after the wildfires that were caused by this practice a couple of year ago.

Response #6 - *The reference to wildfire caused by prescribed burning must refer to other areas of the State or southwest. No prescribed fires have become wildfires in the Youngs Canyon allotment area.*

In addition, Page 15 of the EA says vegetation treatments include “cut and broadcast burn 5,322 acres on the allotment.” However, the use of the word broadcast in this sentence is incorrect. Large acreage maintenance underburning will not be done under any of the alternatives.

To clarify, prescribed fire will be used in two ways as follows: 1) Fires could be used as a tool to remove small trees within previously cleared pinyon and juniper areas. As stated on page 15 of the EA, these range from 20 to 300 acres in size. Most will be treated by hand or mechanical tree removal but some may be burned to remove the small trees, 2) fire will be used to remove slash in those places where slash is too heavy. Most of the previously cleared pinyon and juniper areas and the young pinyon and juniper trees in the northeast corner of the allotment will produce small amounts of slash that is best left on site. Leaving slash helps hold moisture and protect new grass plants until they can become established. In the old fuel wood cuts (880 acres) and the previously untreated areas (1,062 acres) there may be places where slash is very (greater than 10 tons per acre). In this case, the slash may be burned. Slash would either occur

in piles or be lopped and scattered. We estimate only 200 acres or so will require prescribe fire to remove excess slash.

Comment #7 - I do not support thinning of trees to benefit livestock grazing.

Response #7 - *See Response #2 above*

Luane Chambers Letter dated April 18, 2001

Comment #8 - I applaud the plan to reclaim the grasslands and repair the damage caused by overgrazing and overgrowth of pinyon and juniper. However, I do have some concerns with Alternative A.

Information on page 57 indicates that there is no likelihood that the permittee will ever make a profit on this land. ... it's impossible to imagine that any rancher would participate in a plan with such severe restrictions as found in Alternative A. It would be bad business, suitable only as a tax write off. Sentimental memories of ranch life gone by cannot justify bad business or charity by the Forest Service. I think the Forest Service should simply acknowledge that cattle grazing is not a viable activity on this allotment and get the cattle off as soon as legally possible. Removing barbed wire fences, cattleguards and eroded roads would go a long way toward restoring a pristine environment.

Response #8 - *See Response #5 above*

Comment #9 - My second disagreement with Alternative A is the plan to burn as many as 5000 acres over 10 years. I hope that annual review and monitoring will cause the forest Service to choose a more conservative burn plan.

Response #9 - *See Response #6 above*

Letter from the National Wildlife Federation – April 27, 2001

Comment #10 - Agency dismissal of the Youngs Canyon allotment itself as insignificant to pronghorn survival is also very troubling. At our meeting in Flagstaff in February, you suggested that the Forest Service did not see the Youngs Canyon allotment as significant pronghorn area because, among other things, you believed only 10 to 15 pronghorn used the allotment. We have since learned from Arizona Game and Fish records that pronghorn number on Anderson Mesa have declined from several thousand in the 1940's -50's to less than 150 in 1999, and less than 110 in 2000. These pronghorn summaries confirm that only 304 pronghorn were found in 1999 on all of Unit 5B – of which Anderson Mesa constitutes less than 50% - and only 220 existed in 2000. If 15 of the 110 remaining pronghorn on Anderson Mesa graze, fawn, or otherwise make use of Youngs Canyon, those 15 animals constitute almost 14% of the entire population. When we're dealing with a species on the brink of viability, that 14% is hardly insignificant. Rather, they represent a meaningful population to be protected and managed ...

The cumulative effects section appears to minimize the importance of "transition range" zones for pronghorn, such as found on the Youngs Canyon allotment. Transition range, like winter, summer, and fawning habitat, is critical to the survival of pronghorn on Anderson Mesa. The availability, quality, and nutritional value of forage in transition zones determine the condition and health of pronghorn when they reach their other habitats, ...

Response #10 *See the response about viability below. In addition, we understand the writer's concern about the Anderson Mesa herd, and the EA gives a description of the relationship of the Youngs Canyon Allotment to that herd. Page 34 describes that the Youngs Canyon Allotment is transition habitat, where antelope spend a few days passing between summer and winter range. Page 34 describes small herds (10 or so) use the allotment for a greater length of time. Page 34*

also describes how competition between antelope and cattle in this allotment for food is minimal. The overall effects to antelope from implementing Alternative A are beneficial.

The availability, quality and nutritional value of forage in transition zones is important. Changes in grazing strategies will improve forage. Changes in vegetation from treatments will also improve forage. Although not linked to each other, these two management scenarios will improve antelope habitat. The effects of Alternatives on similarity to potential natural community are displayed in the alternative comparison Table 2 – page 21 and 22 of the EA.

Comment #11 - As you know, the Coconino National Forest Plan expressly requires that the agency “manage habitat to maintain viable populations of wildlife and fish species and improve habitat for selected species.” Forest Plan, p. 22. If these numbers don’t depict a situation of non-viability, we specifically ask that the Forest Service – in its response to these comments – define what does constitute a viable population, and provide a reasoned and science-based explanation of why the Anderson Mesa Pronghorn population is viable and self-sustaining. ... the FS has a substantive obligation to maintain the viability of MIS including the pronghorn on Anderson Mesa. Quotes from NFMA... The quote from NFMA ... “create an affirmative duty on the part of the Forest Service to maintain viable populations of wildlife – especially MISs- on the forest.” The letter quotes 36 CFR219.19 – as it refers to viable populations in the planning area

Here, the Forest Service has made no well-reasoned or convincing effort to address much less explain how it can expressly find that the Anderson mesa pronghorn population is below minimum viable numbers... and then reach a conclusion in the Youngs Canyon EA that population viability on the Forest for all MIS is expected to be maintained over the life of this decision.

Response #11 *In the EA we have not said that the Anderson Mesa Pronghorn population is viable. We state that the pronghorn antelope population on the Forest is viable. Management Indicator Species’ viability is required to be addressed on a forest-wide basis. We meet the intent of our Forest Plan direction by addressing antelope on the forest-wide basis. In addition, actions on the Youngs Canyon Allotment under any alternative will not affect that viability (p. 34 of the EA). The viability of the Anderson Mesa herd by itself is not a requirement of our analysis. CFR 219.19 refers to forest plan analysis – this project is not a significant amendment to the forest plan and therefore does not apply to 219.19. Furthermore, the ‘planning area’ referred to in these regulations would be the area covered by the Forest Plan (again the forest) or the area covered by a significant forest plan amendment (of which this project is not).*

Comment #12 - AWF and NWF therefore renew their requests that the Forest Service, 1) undertake immediate action to protect and maintain a viable population of Anderson Mesa pronghorn, 2) fully and realistically analyze the cumulative and additive impacts of domestic livestock grazing, as well as all other activities on all contiguous allotments of Anderson Mesa which comprised the historical, presettlement habitat of antelope, as required by law, 3) immediately develop and implement a Mesa-wide study and management plan for recovery of pronghorn on the Mesa.

Response #12 - *The bulk of the Anderson Mesa antelope population is located outside of the Youngs Canyon Allotment. Youngs Canyon Allotment is primarily transition range for Anderson Mesa pronghorn. The suggested study is outside the scope of this analysis.*

Comment #13 - AWF and NWF therefore renew their requests that the Forest Service, 4) perform a full and complete Environmental Impact Statement (EIS) rather than and EA on Youngs Canyon

Agencies must prepare an EIS when proposed federal action is “controversial” that is, when substantial questions are raised as to whether a project... may cause significant degradation of some human environmental factor...

The issuance of a grazing permit is a proposed action that may significantly affect the human environment. This case, where the proposed action may impact a significant population and habitat of a MIS and where even the Forest Service acknowledges that the impacts on the Anderson Mesa pronghorn herd and the reasons for its declines are rife with uncertainty and controversy, an EIS must be prepared. An agency must generally prepare an EIS if the environmental affects of a proposed agency action are highly uncertain.

Response #13 - *We have consulted NEPA regulation and policy and have determined that an EA is suitable for this project. The affects of the Youngs Canyon Allotment alternatives on pronghorn antelope forest-wide and specific to Unit 5B are certain. The paragraphs in the AWF/NWF letter make the point that there is uncertainty about the effects of the Youngs Canyon alternatives on pronghorn habitat. However none of the citations adds to uncertainty. The citations speak to the Anderson Mesa pronghorn population. There is no direct link between a Youngs Canyon Alternative and degradation of antelope habitat. On the contrary, the Youngs Canyon alternatives have positive effects to antelope habitat.*

Comment #14 - AWF and NWF therefore renew their requests that the Forest Service 5) obtain funding to actually perform and the proposed fire treatments, wildlife friendly fence replacements, and any other mitigation measures relied upon in your current proposed alternatives.

Another source of uncertainty giving rise to the need for a complete EIS is whether the Forest Service will actually be able to offset environmental impacts of grazing through its proposed mitigation measures.

Response #14 – *New fence construction built to Forest Plan standard for wildlife is funded as part of allotment management as described in the Alternatives. Pinyon, juniper and ponderosa pine treatments are not “mitigation measures relied upon you the alternatives”. These treatments benefit wildlife and watershed resources and will be implemented as funding becomes available. Other coordinating requirements such as archaeological surveys will be funded as part of implementation.*

Comment #15 - In reversing the initial EA and FONSI, the Appeal Deciding Officer relied on the Reviewing Officer’s finding that “the EA does not adequately disclose cumulative effects related to pronghorn antelope”. Despite the opportunity to fix this problem, not only does the new draft EA still fail to address grazing impacts from associated and contiguous allotments on Anderson Mesa, but it references non-existent cumulative threats (such as road building, power lines, etc.) which are not issues on Youngs Canyon (since there are no new roads planned and the power lines have been there for years).

Although the revised EA now includes a general discussion of the importance of five allotments to pronghorn habitat and use on Anderson Mesa and an analysis-free list of potential other projects on the Mesa which may benefit pronghorn on the forest, the document still does not evaluate how the proposed action on Youngs Canyon – grazing management – will impact pronghorn in conjunction with the proposed grazing actions on all these other allotments. Rather than simply stating what habitat exists on what allotment, the task of the Forest Service is to conduct an actual analysis of what the proposed management actions will do to that habitat. ... it’s the actual impact that must be analyzed... The revised EA still fails to do any analysis to describe exactly how livestock grazing on each of these allotments – the management decision being made by the agency – impacts the vegetation, predation,

fawning grounds, etc. of the pronghorn populations.

The issue of coyote predation on pronghorn fawns is another aspect of the agency's EA which has not been adequately explored. ...

Response #15 *The analysis of cumulative effects in the EA is adequate because it discusses items relevant to the actual effects that occur on the Youngs Canyon Allotment. To summarize, the effects of Alternative A to antelope include 1) more reliable water 2) a small additional fence around a trick tank, 3) increase in vigor/seed production from an improved grazing system, 4) maintenance of habitat and 5) increase in available habitat. (summary of page 37 of the EA). In addition, Alternative A may reduce predator success.*

The discussions on pages 38-42 address other projects in the vicinity with similar effects. To summarize, 1) more reliable water also occurs as a result of the Forest wide water development project listed on page 42 and the waterline proposed for the Padre Allotment. 2) Page 38 describes ongoing efforts to bring old fences to standard on the Peaks and Mormon Lake Districts and one mile of new fence is proposed on the Pickett Lake/Padre Canyon Allotments, 3) increase in vigor and seed production, maintenance of habitat and availability of habitat is discussed via a list of other projects in the vicinity that have or could change habitat. The list of page 40 shows proposed vegetation treatments. The exact locations, timing etc of these treatments are unknown. The vegetation treatments on Youngs Canyon provide a positive effect to antelope habitat. So any additive effect to future projects is also positive.

Currently, competition for food and disturbance between antelope and cattle is minimal due to lack of dietary overlap and relatively few numbers of antelope. Big game movement occurs throughout (page 34 of the EA). Because the action alternatives do not change this situation there no added effects. The Youngs Allotment is not additive to the cattle grazing that is currently occurring or proposed to occur on other allotments so those grazing systems are not discussed in detail. There is not an effect to fawning from alternatives, therefore no added effect to fawning to analyze. Predator success is not likely to increase so there is not an added effect to predation from Alternative A. The Arizona Game and Fish Department manages coyote populations.

Comment #16 - "Notes on Anderson Mesa" Reggie Fletcher, Regional Ecologist, September 13, 1999 - This publication (which) expressly confirms that pronghorn populations on Anderson Mesa are no longer viable... (was) entirely absent from any consideration in the project file for the Youngs Canyon EA. Instead, a wholly contrary and self-serving memorandum regarding a meeting between Arizona Game and Fish and the Forest Service only a year later concludes not only that Youngs Canyon "is not a priority area for pronghorn as compared to other areas" on Anderson Mesa, but also that "pronghorn viability on the Forest is not an issue. Pronghorn antelope numbers are not low enough to result in viability concerns."

Response #16 – *The 'Notes on Anderson Mesa' by Reggie Fletcher was for a trip across Anderson Mesa, Youngs Canyon is not on Anderson Mesa. The project record document mentioned, was created during the analysis process and therefore is placed in the project file according to NEPA regulation. The statement accurately depicts the relationship of the Youngs Canyon Allotment to the Anderson Mesa herd and the viability of antelope on the forest as a whole.*

From the field trip on May 22, 2001 , 2 questions were raised

Fences on the landscape are detrimental to pronghorn antelope habitat because they create barriers to movement. Some fences on the Youngs Canyon Allotment are were constructed prior to the forest plan guideline of a smooth bottom wire 18” from the ground. Fences should be 1) removed in not needed anymore, or 2) upgraded if still needed and not built to standard.

Separate from the Youngs Canyon decision – an ongoing effort is underway on the District to improve fences in pronghorn habitat.

The Forest Service should consider an alternative that includes no cattle grazing but includes all the pinyon and juniper treatments described in Alternative A.

NEPA regulations allow the decision maker to pick and choose from various alternatives to make a decision. Since the effects of cattle grazing are disconnected from the effects of pinyon, juniper treatments, this EA fully discloses what the effects of a no cattle/pinyon, juniper treatment alternative would look like. The effects of no cattle grazing are displayed in alternative B and the effects of pinyon, juniper treatments are described in alternative A. We do not therefore, need to go back and create a new alternative. The Peaks District Ranger will consider this option when making a final decision for this project. The responsible official decides the purpose and need of the project.

As noted on page 34 of the EA – All MIS species population viability (including antelope) are expected to continue over the life of this decision for all alternatives.