UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 16, 2005

Mr. Mike Hannemann
ATTN: Pickett/Padre DEIS Comments
5075 N. Highway 89
Flagstaff, AZ 86004

Subject: Draft Environmental Impact Statement for Pickett Lake and Padre Canyon Allotments, Mormon Lake Ranger District, Coconino National Forest, Coconino County, Arizona (CEQ # 20050177)

Dear Mr. Hannemann:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

Based on our review, we are rating the Preferred Alternative (#3) as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). EPA has concerns regarding potential impacts to existing impaired meadow and grassland soils. We request additional information regarding the location of these soils and the potential impacts of more cattle grazing for a shorter period of time in these areas, as compared to existing grazing practices.

To ensure protection of vegetation and pronghorn fawning habitat, we also recommend that the additional fencing in the Boot and Breezy pasture seasonal wetlands be included as part of the proposed action, instead of as a probability under adaptive management. Commitments for these fencing installations, which the DEIS indicates are reasonably expected, should be included in the project Record of Decision (ROD).

We commend the United States Forest Service for the additional wetlands protection that will occur under this project through fencing and the avoidance of grazing in wetlands during the waterfowl nesting season. Also, combining the two allotments for greater grazing distribution and flexibility is innovative. The clarity of the document was frustrated, however, by a lack of maps and geographic information. Frequent reference was made to specific lakes without their identification on maps. Additionally, Terrestrial Ecosystem Survey (TES) map units are referenced (p. 35, 36, 43) but are not included in the document. These maps or detailed geographic descriptions should be included in the Final EIS.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me or Karen Vitulano, the lead reviewer for this project. Karen can be reached at 415-947-4178 or vitulano.karen@epa.gov.

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Sincerely,

/S/
Nova Blazej, Acting Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:
Summary of EPA's Rating Definitions
EPA=s Detailed Comments

Grazing Intensity and Soils

The Draft Environmental Impact Statement (DEIS) states that "cattle numbers on the Picket Lake and Padre Canyon Allotments would be reduced 14 percent from what is currently authorized" (p. 8, 21). These statements seem to imply the reduction of actual numbers of individual cattle on the Allotments, but the proposed action would result in an increase in the number of individual cattle with a reduction in grazing time periods (and therefore a reduction in the number of animal unit months).

The expected impacts to soils and vegetation from a larger number of cattle grazing a shorter amount of time are not explicit in the DEIS. The allotments include 5,019 acres of unsatisfactory and impaired meadow and grassland soils "dispersed across the landscape" that can be affected by this project (p. 35). Additionally, a few water quality monitoring sites noted less than adequate vegetation litter to minimize soil movement at the end of the growing season after wildlife had removed the remaining stubble height (p. 39). This information implies an overgrazed condition in some areas, but the locations of these areas are not specified.

> Recommendation:
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> In the Final EIS, clarify that the proposed action does not reduce the number of individual cattle but reduces the animal unit months (p. 8, 21). Make explicit the impacts to soil and vegetation resources that can be expected as a result of more cattle grazing in a shorter amount of time, and reference impaired soils locations in this discussion. Include geographic descriptions of impaired soils locations and water quality monitoring sites of concern, with maps if possible. Provide maps or geographic descriptions to correspond with references to Terrestrial Ecosystem Survey (TES) map units (p. 35, 36, 43). Propose mitigation, as appropriate, to lessen the contribution of grazing in the soil impaired areas, such as a reduced percent utilization in such areas, if applicable. Quantify the environmental benefits of proposed mitigation where possible.

Wetlands Vegetation and Antelope Fawning

The DEIS states that most of the wetlands currently affected by cattle grazing are located in the Ashurst, Boot, Breezy and Ducknest pastures on the Pickett Lake Allotment (p. 39). The DEIS also states that pronghorn antelope populations are declining in the forest (p. 102) and fawning recruitment is a concern in the project area (p. 104). Pronghorn choose fawning areas within one-half mile of water, and suitable habitat for fawning occurs in the same pastures of Ashhurst, Boot, Breezy and Ducknest (p. 104).

It appears that only Post Lake on the Ashurst pasture and the Ducknest wetlands (Ducknest, Indian Tank and Perry lake) will be fenced as part of the proposed action. All Boot and Breezy pasture seasonal wetlands (Boot, Breezy, Indian Lake, West Breezy) will be grazed from July 15th through September 30th and monitored under an adaptive management program. The DEIS

indicates that the later in the season grazing occurs, the less time there is for regrowth to occur prior to pronghorn establishing fawning territories in the spring, and residual cover from the previous year can be an important feature in providing fawning cover from predators (p. 105,106).

Recommendation:

Since Boot and Breezy pasture seasonal wetlands vegetation are among those most affected by cattle grazing and are also pronghorn fawning habitat, EPA recommends including the fencing of these wetlands as part of the proposed action. It appears there is sufficient information indicating impacts to these areas, since the DEIS predicts they will need to be fenced within the next 3 years as funding becomes available (p. 7). Fencing will prevent these wetlands from being grazed after July 15th, preventing soil compaction and reduction of emergent vegetation height, benefiting wetlands and pronghorn fawning. We also recommend the Final EIS include the estimated acreage of all wetlands that will be fenced as part of the proposed action. A commitment to this fencing should be included in the Record of Decision (ROD).

The DEIS states that other wetland areas have been rested from cattle grazing since 2002 to study the effects of cattle grazing in wetlands (p. 43). If preliminary results from this study are available, they should be included in the Final EIS.