

Debbie C. Cress
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January 14, 2007

Dear Ms. Cress,

On behalf of the Arizona Wildlife Federation, we want to thank you for the time extension that you provided, to insure that we could be involved in the process to develop an allotment management plan (AMP) for the Bar T Bar grazing allotment. We offer the following comments to help guide your development of issues and alternatives for the management of this important tract of public lands.

The lands of the Bar T Bar grazing allotment have suffered from the effects of over grazing, drought and finally the Willow fire. We are concerned, as you begin to develop the allotment management plan for the area, that you fully take into consideration the climatic and environmental conditions that have led to the current land conditions.

Our primary interest is to insure that the fish and wildlife populations that inhabit this area have adequate forage and water to flourish within the lands capability. The severe damage that this land has received has reduced that capacity. Healing and restoration of the land is occurring after the Willow fire, it provides a perfect opportunity for careful management, insuring that any domestic livestock grazing is compatible with the lands capability and the needs of the fish and wildlife that utilize the area.

The 2004 grazing permit authorizes 310 cow/bulls from March 1 through February 28 (year long) an additional 30 cows/bulls from November 1 through May 31, 40 yearlings from January through May and 10 horses year long. Your proposal authorizes 310 head of cattle using an adaptive management approach to implement a 9 pasture, deferred rotation strategy. Initial stocking would be approximately 100 head.

It is unclear why the authorization is proposed to stay the same (310 head of adult cattle) when the conditions of the Range do not support that level of stocking. The numbers of permitted cattle should be reflective of the lands capacity. The Tonto Land Management plan specifies that grazing should occur where suitable. This area has been determined to be suitable but it cannot support the proposed permit numbers. This should be fully explained in the environmental assessment, and alternatives that provide a grazing permit within the lands current capability should be developed.

Your analysis should carefully document and develop information to support this level of stocking. We are concerned that the long-term drought that we have experienced needs to be factored in as well as ensuring that adequate forage for wildlife be provided. In

addition, the Arizona Game and Fish Department had reported that the Willow Fire had impacted populations of the headwater chub. Your analysis should clearly document any potential conflicts with this fish species.

The proposal as presented relies heavily on annual monitoring to determine the level of stocking in the future. While this process has the potential to work, it is funding dependant, and often is not accomplished at the scale that is needed to adequately determine stocking levels for the future.

We appreciate this opportunity to be involved in the development of the Bar T Bar allotment management plan. We look forward to seeing the environmental assessment. Further opportunities to review scoping documents such as those you mentioned for the Campaign and Bar V Bar allotments on the Tonto Basin Ranger District are welcome. We will get in touch with you on any questions that arise.

Sincerely,

Ryna Rock, President
Arizona Wildlife Federation

Brad Powell, Chair
Conservation Comm.
Arizona Wildlife Federation