

In November of 2008, the Coronado National Forest (CNF) solicited public comments on draft statements of "desired future conditions" for 14 management plan topics: *air, fire, heritage, land use zones, public access, range, recreation, riparian, roads, scenic quality, soil, species diversity, tribal relations, and vegetation.*

SACPA's Board of Directors approved funding Mr. Dennis Parker to submit commentary. Mr. Parker is an attorney in Arizona with experience as a practicing field biologist. Copies of his commentary written on behalf of SACPA are available to members upon request. Please contact the SACPA Secretary, Micaela McGibbon at (520) 393-1722.

Mr. Parker wrote the CNF a letter, 3,867 words long, citing dozens of peer-reviewed scientific studies in support of controlled livestock grazing. He attached a bibliography and copies of the cited papers. Mr. Parker also documented the chronology of the continuous presence and numbers of cattle grazing in southern Arizona and Sonora since the 16th century. Further, Mr. Parker returned copies of the CNF's draft plan sections back to the CNF requesting very specific edits to recognize the existence and the benefits of managed grazing and to protect existing rights. He did so in a format that makes it easy for CNF to make those *exact* corrections.

Mr. Parker's letter made five specific points:

1. Controlled Livestock Grazing is an Important, Sustainable and Highly Beneficial Multiple Use of the Coronado National Forest.

Citing 17 peer-reviewed papers supporting the benefits of managed livestock grazing to fishes, birds, rangelands, and open space; protecting lands from fragmentation; providing on-site stewardship and fiscal sustainability, he concludes,

"... we urge the Coronado National Forest to consider ranching, and its use of controlled grazing, as an integral and central theme of the Forest Plan revision process."

2. Diminishing Threatened and Endangered Species Numbers Follow Exclusion of Livestock from Their Habitats

Four studies were discussed, showing the demise of native fishes, snakes and frogs following grazing exclusions.

3. Arbitrary Snapshot in Time (circa 1880), Is Neither a Relevant nor Reliable Reference for the Development of Desired Future Conditions [refuting a false assumption made by CNF]

Detailing the history of cattle ranching in Sonora and southern Arizona since 1531, Mr. Parker concludes,

"... desired future conditions cannot be based on a snapshot in time because, unlike a snapshot, the ecosystems of the Coronado never have been, nor currently are, static in nature... [the] more defensible approach is to allow sound management, confirmed by scientifically conducted monitoring and assessment, to determine desired future conditions"

4. Tourism and Recreational Revenues Are Not Production Dollars and Therefore Cannot be Described or Treated as Such or Relied Upon as Sustainable

"...Only actual production creates new wealth without which no economy is fiscally sustainable. Here, the tourism and recreational revenues apparently regarded by the Forest to date as production dollars are, in fact, actually second-hand or recycled derivatives of production dollars. . . these derivative dollars do not represent a sustainable or dependable source of revenue. . . On the other hand, revenues provided by ranching are both sustainable and dependable because they are primary, production dollars that contribute to the health of the production economy that underpins them. As a result, we urge the Forest Service to properly segregate tourism and recreational revenues from those revenues resulting from actual production in its revised Forest Plan."

5. Public Access to the Forest Through Private Lands

"...That golden opportunity is to establish a legal mechanism within the Forest Plan by which landowners who allow public access across their lands to the Forest are immunized [by the United States, through contracts] from potential liability to the extent allowed by law for doing so."