



Pima Natural Resource Conservation District  
Pima Center for Conservation Education, Inc.  
NRCS Plant Materials Center  
3241 N. Romero Road  
Tucson, AZ 85705



**Pima Center for Conservation Education, Inc.**

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A 501(c)3 nonprofit corporation

August 24, 2019

To: Coronado National Forest Grazing Permit Applicants

Dear Coronado Forest Grazing Applicant,

As you should already be aware, the Coronado National Forest has re-opened its comment period for grazing permit applicants to respond to its recent Biological Assessment for Livestock Grazing (BA). You presently have the opportunity to submit new comments, even if you previously submitted comments. You must submit your own comments, as the Forest Service is not accepting comments from anyone other than the applicants.

I am writing to inform you of several important expert commentaries that you can now download from our website and submit in attachment to your own comments or addendum to your previously submitted comments. You could easily just state that you wish to be represented in addition to the individuals already named in those comments.

The comments are available here: <https://pimanrcd.wordpress.com/educational-resources/commentaries/documents-related-to-coronado-nf-biological-assessment-on-grazing/>

During the comment period that closed in May, the Pima Center for Conservation Education (PCCE) and the University of Arizona Natural Resources Law and Policy Center (NRULPC) each contracted scientific experts to write commentaries that you as an applicant could easily submit in attachment to your own comments. In addition, Jim Chilton independently contracted with biologist Dennis Parker to write comments regarding the proposed actions to protect the Chiricahua Leopard frog and the Sonora Chub, a warm-water fish.

The comments were written to help the Forest Service uphold its mandate to rely solely on the best available scientific information. Commenters pointed out problems such as the use of outdated or irrelevant information in the cited scientific reports and the fact that better data collected from decades of surveys, monitoring reports and recent peer-reviewed studies were all overlooked. The

comments also suggest better solutions. Since the comments were first submitted, representatives from the Forest Service have met with those applicants named and engaged in a friendly, cooperative discussion on how to improve the scientific validity of the BA.

The NRULPC produced commentaries by Al Medina, a published expert, addressing warm-water fish; and George Ruyle concerning grazing management.

Funded by the PCCE, biologist Robert Schmalzel, the leading expert on the Pima pineapple cactus, wrote commentaries on the Pima Pineapple Cactus, the Huachuca water umbel, and the Canelo Hills ladies' tresses. Mr. Schmalzel has indicated he would be happy to present his comments to your local NRCD.

In short, the combined commentaries covered grazing utilization, the interaction between livestock and endangered species including warm-water fish in general, the Gila topminnow, Sonora chub, Sonoran tiger salamander, Northern Mexican garter snake, Ridge-nosed rattlesnake, Pima Pineapple cactus, Huachuca water umbel, and Canelo Hills ladies' tresses.

I am also writing to request your financial support for the production of these comments. The PCCE committed to fully funding Mr. Schmalzel's comments, which were about \$10,000. Due to the short comment period, a generous individual made a commitment to personally fund whatever amount we could not raise from other individuals and organizations. None of the three species addressed by Robert Schmalzel are found on our generous donor's ranch. Unfortunately, we still have about a \$6,500 shortfall.

Please consider sending a generous check made out to the Pima Natural Resource Conservation District, and a cover letter stating that the contribution is for the Pima Center for Conservation Education.

The PCCE is a 501(c)3 tax-exempt corporation, with Taxpayer Identification Number 86-0796404.

Please also consider making a generous contribution to the NRULPC.

Please ask the organizations to which you belong to make generous contributions as well.

Sincerely,

Cindy Copping

Supervisor, Pima Natural Resource Conservation District.