

## Objections to Stateline Range NEPA Project

Gila National Forest

Glenwood Ranger District

District Ranger Erick Stemmerman,

Apache-Sitgreaves National Forest,

Clifton Ranger District

District Ranger Ed Holloway Jr.

I am submitting objection to the Draft Decision Notice for the Stateline Range NEPA Survey. The new plan does not address my concerns mentioned in my comments submitted in the previous comment periods.

This NEPA survey includes land in Dry Creek Allotment of the Glenwood Ranger District in The Gila National Forest. I own private property that is completely surrounded by the allotment, and the decisions in this draft directly impacts me in many ways. The most dramatic impacts will be a proposed well which is upstream of my property one within a mile. This proposed well is likely to negatively impact groundwater conditions on my property. My own well provides water for our living needs on the property. The water right on my well is for 3 acre feet per year dated priority 1920. My family relies on this well and its modest production. Our well produces a very low flow about 2 gallons per minute on average. I have tracked production, and we have adjusted a system to meet our needs. Our well provides essential water for our lives: home use, livestock, orchard, garden, and work. In summary the installation of this well is very likely to reduce our already low flow to a level that will have severe negative impacts on our ability to maintain our livelihood on our own property. Despite my previous comments about this, no adjustment has been made. There have also been no hydrological surveys made, as requested. This plan provides no consolation for me, if my well goes dry due to upstream pumping of ground-water. I plan on protesting this well with the office of the State Engineer on these grounds. Also the equipment to access these areas would be disturbing an area that is currently under consideration to be wilderness for its undisturbed qualities. The installation of this well in this location and the changes that would occur to access this area would severely change this wild and beautiful canyon called White Rock Canyon and turn a wild area currently under consideration for wilderness into a heavily-impacted sacrifice zone. This is against Forest Service Policy as the Forest Planning process is still underway. In addition to this it will likely draw cattle closer to my property and degrade the adjacent land which also affects my property value.

In addition to these impacts that have not been addressed, I object to the current proposed management which is identical to the management structure already in place. My comments pointed out various problems with the current management in place. Although it mentions that its objective to “develop adaptive management strategies” there are no new strategies mentioned in the draft. The strategies are essentially the same as previous management except for new infrastructure. My previous comments demonstrate Forest Service Management’s distinct lack of proper response to dealing with normal changing conditions, such as proper cattle reductions on a dry year, and there is no evidence that the new authorizations will improve management. The new plan does not address lack of thorough yearly monitoring. It does not put any plan of action into place such as hiring more staff to execute timely and proper monitoring or training and using a citizen’s monitoring group. It does not propose any upland grazing-free zones or required years of rest for allotments and pastures, which are largely missing in the Gila National Forest. By not dealing with these concerns it allows damaging overgrazing practices to continue, which impact wildlife habitat and potential. This includes habitat for endangered species located in this area such as the willow-flycatcher, narrow-headed garter snake, Mexican Gray Wolf, etc

It does not address the problem of cattle consistently getting into exclusion areas, it also does not take into account large sacrifice zones. There has been no mapping of these sacrifice (heavily-impacted) zones which are frequently over a mile in size. All of the data collected in the long term monitoring reports is outside of these heavily impacted areas, and when data showed negative impacts, it was discarded, as I mentioned in my comments, for example in the case of Dry Creek Allotment, Sundial Pasture. A comprehensive evaluation of these practices would involve detailed mapping of each allotment which would include areas that have been significantly impacted. Grouping all of these allotments, thousands of acres is too much for a single EA and FONSI.

In short this project does not fulfill its obligations to the community and wildlife because it explicitly states :

*The objective of the analysis is to develop adaptive management strategies for livestock grazing in order to reissue the term (10-year) grazing permits while meeting desired resource conditions. . .*

The object of this “study” is to reauthorize grazing, and so whatever data was collected was done in a way that promotes this idea, it is admittedly not an objective survey that identifies what the damaging effects of large-scale cattle grazing are, and how to mitigate them. As I stated in my comments, this project systematically does not take into account impacts on heavily grazed land known as sacrifice zones which are areas often more than a mile in diameter, so this means thousands of acres of “unintended consequences” by large scale cattle grazing on National Forest Lands. NEPA explicitly prohibits unintended consequences:

## TITLE I

### CONGRESSIONAL DECLARATION OF NATIONAL ENVIRONMENTAL POLICY

Sec. 101 [42 USC § 4331]

(a) The Congress, recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.(b) In order to carry out the policy set forth in this Act, it is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may –

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; 2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;

4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;

5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and

6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources. (c) The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment.

The National Environmental Policy Act specifically states that beneficial uses must be “without degradation” or “undesirable and unintended consequences.” Despite large areas of impacted land, this project proposes no cattle exclusion areas that would be devoted to wildlife, areas in which wild animals would not have to compete with domestic livestock for forage.

Thank You,

Claire Bergeron

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