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Submitted via email to: objections-southwestern-regional-office@fs.fed.us

Re: Objection to the Stateline EA and FONSI

To Supervisor Mendonca and Supervisor Best:

Pursuant to CFR 218.8(d), WildEarth Guardians files this Objection to the Final Environmental Assessment and proposed ROD issued by Adam Mendonca and Stephen Best for the Stateline Range NEPA Project. WildEarth Guardians filed comments on the Draft EA on November 30th, 2018.

Pursuant to CFR 218.8(d), WildEarth Guardians hereby states that the following content of this Objection demonstrates the connections between the November 30th, 2018 comments (or "EA comments") for all issues raised herein, unless the issue or statement in the ROD or Final EA arose or was made after the opportunity for comment on the Draft EA closed, as detailed herein. WildEarth Guardians' Draft EA comments are incorporated and referenced herein. Pursuant to the Administrative Procedure Act, 5 U.S.C 553-706, and USFS requirements, the Regional Forester's Office must provide a detailed response to each of the issues/objections raised in this document.

WildEarth Guardians

WildEarth Guardians is a nonprofit conservation organization with offices in New Mexico and five other states. We have more than 238,000 members and supporters across the United States and the world. Guardians' mission is to protect and restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians has organizational interests in the proper and lawful management of the Gila National Forest, its wildlife, wild places and watersheds.

1. The EA Violates NEPA in Numerous Respects

a. The Forest Service failed to respond to comments

NEPA requires "the agency must respond to the substantive comments received from other government agencies and from you and other members of the public" (CEQ NEPA Regulations, 40 C.F.R. § 1503.4.) Many of our comments on the Draft EA were not responded to either implicitly or explicitly, including our comments on baseline conditions, the required "hard look",

site-specific monitoring, and climate change. We expand on the failure to respond to these specific comments in the below sections.

Suggested Remedy: Prepare an EIS that includes an expanded public involvement section where the Forest Service identifies and responds to specific concerns raised by the public.

b. <u>The EA does not analyze baseline conditions and fails to take a "hard look" at the direct, indirect and cumulative impacts</u>

Our EA comments laid out NEPA's requirements for analyzing baseline conditions and for taking a hard look at the direct, indirect and cumulative impacts of the project, and explained how the Draft EA failed to meet those requirements. The Final EA does not remedy these failures.

i. Baseline Conditions

On p. 4 of our comments on the Draft EA, we stated "There's no monitoring data - merely mentioning or providing a broad, favorable generalization of such monitoring data does not suffice." The Final EA provides no additional information, instead referencing various reports that are purportedly in the project record but are not available for public review.

For example, the Final EA states that the "'Range' report, available in the project record, details the general description" of the affected environment for upland vegetation and "rangeland resources." Final EA, p. 31. Yet, that report is not included on the Forest Service's website and we were unable to review that report as part of the NEPA process. The EA's table of general trend determinations across the entire project area (Final EA, p. 33, Table 7) does not suffice as an adequate analysis of baseline conditions.

The EA states that "[i]n some areas, the altered plant communities can no longer achieve what may have been historic conditions. As noted in the long-term trend data, many of the plant communities in the project area are in stable states with botanical compositions that have remained static for decades." Final EA, p. 37. Yet, merely because plant communities are "stable" and botanical compositions have remained "static" does not mean that they are in good condition (or desired condition) and providing the necessary soil cover and native species habitat. There's no indication of what historic conditions were, what the desired conditions are for each vegetation type, or what the current biological compositions are. There is also no discussion of where the areas are that can no longer achieve historic conditions or why. Nor is there any analysis of what areas can still achieve historic conditions and what changes to grazing management are necessary to do that. This is exactly the type of information and analyses that must be included in a NEPA analysis to enable adequate public participation in the decision-making process, and for the Forest Service to make a decision based on the best available science and monitoring data.

As to wildlife (including birds, fish, amphibians, etc..), the Final EA lists a number of species, including T&E species, and provides a very general sense of where they are located, but there is no discussion of their existing condition, habitat conditions, and the threats to their existence. Final EA, pp. 54-55.

The Stateline grazing project covers 14 allotments, covering 271,665 acres. The Forest Service collected data on upland vegetation at only 69 sites. Final EA, p. 31. There is no indication of how often this data has been collected, the size of each monitoring site, the vegetation type(s) of each monitoring site, or how many acres each monitoring site represents. Data collected for some unspecified time at only 69 sites for a project of this size does not suffice as collecting sufficient baseline data and certainly does not represent the existing or baseline conditions of this extensive project area. "If an agency has outdated, insufficient, or no information on potential impacts, it must develop information as part of the NEPA process." EA Comments, p. 2. Just as in the Draft EA, the Final EA does not contain high quality, accurate scientific information or analysis.

Other reports referenced in the EA but that are not available on the Forest Service's web page for the Stateline grazing project include the Watershed report, the biological evaluation and the biological assessment. Nor is there a report on cultural or heritage resources referenced or included. The public must have access to these reports as part of the NEPA process, we cannot simply take the Forest Service's word that conditions are good after decades of intensive grazing combined with drought, climate change, other management projects, and motorized vehicle use across over 271,000 acres.

All of these resources (riparian areas, watersheds, streams, wildlife, native plants, cultural and heritage resources…) suffer from the same lack of site-specific, baseline data and analysis as upland vegetation, discussed above. General statements about overall conditions found to be satisfactory or functioning properly do not suffice. For example, "[o]verall, soil conditions were found to be satisfactory across the majority of the project area." Final EA, p. 42. Yet, "[o]n some monitoring sites across the project area, vegetation cover has not increased or has declined since the 1950s or in recent years and could affect future soil conditions." *Id.*, p. 43. Without any site-specific information on where soil conditions are satisfactory or where conditions have failed to improve or even declined, it is impossible for the public to participate in the NEPA process and have a proper say in how these areas should be managed.

In addition, it appears that the monitoring the Forest Service based its analyses on has only been conducted for a few years at most. For example, upland soil and watershed conditions were only assessed in 2016 and 2017, and riparian areas were only evaluated from 2016 into early 2018. *See* Final EA, pp. 42-43. This limited monitoring, in limited locations relative to the size of the project area, does not suffice. The Forest Service cannot make claims about good conditions without reference to previous monitoring results over the past decade (or more) that the existing grazing system has been in place. According to the Final EA, "[t]he proposed action is similar to current management and the existing conditions are a result of that management." Final EA, p. 38. The public needs to know what those existing conditions are for all resources, and the trend over time. Grazing has had significant impacts on the project area, and will continue to do so under the proposed action.

As we explained in our comments on the Draft EA, "[w]ithout establishing baseline conditions, the Forest Service cannot - and indeed did not - carefully consider information about potential environmental impacts. Without this site-specific information, it is nearly impossible for the public

to be able to participate sufficiently – the public must be provided more site-specific information of on-the-ground conditions." EA Comments, p. 2.

ii. Hard Look

While the EA provides some general information about the impacts that grazing can have with references to limited scientific documents, as in the Draft EA there is no actual analysis of the direct, indirect or cumulative impacts that the proposed action will have on the soils, riparian areas, watersheds, wildlife and their habitats, upland vegetation or other resources of the project area.

In the FONSI the Forest describes this project as "site-specific," but when assessing the impacts of the project, the Final EA contains little to no site-specific data or information. Instead, the Forest Service's analysis is more akin to analyzing a large-scale program (and it would be woefully inadequate for that as well). This does not suffice as the "hard look" required by NEPA.

For example, the Final EA discusses soils and watersheds at a very broad scale. Most of the watersheds in the project area are functioning at risk or impaired, with the apparent reasons being livestock grazing and wildfire. Final EA, p. 45. Yet, while the EA identifies the watersheds, there's no indication of their sizes, and there is no site-specific analysis of the impacts that the proposed grazing activities will have on the already impaired soils or watersheds, only very broad, general statements. Table 13 does not suffice as a site-specific analysis, and is based on unsupported claims of improvement.

According to the Final EA, "[t]he proposed action would meet forest plan standards and guidelines, but would not move areas of impaired or unsatisfactory soil, or watershed conditions towards forest plan standards as quickly as the no-action alternative." These impaired and unsatisfactory areas are not identified, and there's no indication of timeframe – how long will it take for these areas to meet Forest Plan standards? A year, 5 years, 10 years, 50 years? These areas have failed to meet Forest Plan standards for decades – allowing decades more to pass is unacceptable and violates the Forest Plan. Indeed, the Forest Service admits that impaired soils "should slightly improve." EA, p. 48. This does not satisfy NEPA's requirement of site-specific direct, indirect, and cumulative impacts analysis. Final EA, pp. 50-51.

Another example is water quantity. The Final EA states, "[c]onsidering the size of the project area (271,665 acres), the amount of water needed is considered to be insignificant and discountable with no measurable effects at the project level; that is, the San Francisco River." Final EA, p. 48. This is not the proper scale to measure effects to water quantity for a site-specific project. That must be done at the site-specific level, where water withdrawals and in-stream grazing will have direct and significant impacts to water quantity.

As to wildlife, the Final EA is similarly flawed, failing to provide any site-specific analysis of how the proposed grazing system and range "improvements" will impact wildlife, birds, fish, amphibians, etc… The Forest Service purportedly prepared a biological assessment (BA), but there is little to no information or data from that assessment in the Final EA, and the BA was not available for public

review as part of the NEPA process. Nor does it appear that the agency did any actual monitoring for species in preparation for this project or the BA.

The Forest Service bases its repeated claims that all resources will improve and there will be few, if any, negative impacts on "adaptive management," BMPs and monitoring, as well as more range improvements. First, it is well established that range "improvements" such as fences and water developments do not, in fact, improve range conditions or draw cows out of riparian areas, and the EA provides no analysis or scientific basis or data to support this claim. Nor is there any analysis of where these new range improvements will be located and the impacts that increased grazing pressure will have on these areas. Increased impacts to soils and upland vegetation can occur up to 1-2 miles from a water source. These increased impacts were not analyzed in the EA.

Second, the Forest Service has always been able – even required - to implement "adaptive management." Indeed, it's required – if grazing is negatively impacting an area, the Forest Service is required to change the grazing management and have the rancher move or remove their cattle. This is nothing new and it hasn't worked in the past. There's no indication or analysis of how this purportedly new adaptive management system will be any different or achieve better results.

Third, the Forest Service has also been required to implement BMPs and monitoring under the existing grazing system and the Forest Plan. Unfortunately, due to lack of funding, staffing, and due diligence, BMPs are often not implemented and monitoring does not happen with sufficient frequency or at the appropriate scale (as exemplified by the limited monitoring dates and locations identified in the EA.) There is no indication or analysis of how this will change under the new grazing plan.

Overall, there is no site-specific analysis or data to support the Forest Service's unsupported claims of overall positive impacts from the proposed action.

Suggested Remedy: Prepare an EIS that includes site-specific baseline data and analysis of the existing conditions of the project area, and that takes the required hard look at direct, indirect and cumulative impacts of the proposed grazing project.

c. Finding of No Significant Impact Is Flawed, an EIS is required

As we explained in our draft EA comments, "NEPA requires that federal agencies must prepare an EIS for "major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(C). . ." EA Comments, p. 5. Because grazing of this magnitude, with a large number of developments, across over 271,000 acres containing sensitive riparian and upland vegetation, threatened, endangered and sensitive species and their habitats, cultural resources and numerous other fragile natural resources, the Forest Service's failure to prepare an EIS violates NEPA.

Notably, the Luna Project which covers just 185,586 acres – almost 100,000 acres less than this one - is considered a landscape scale project and was analyzed using an EIS. While we agree that the

Stateline project is a site-specific project, its magnitude and impacts at least equal, if not far exceed, the impacts of the Luna project. Plus, grazing has been occurring for decades, has already heavily impacted the landscape.

Both the Draft and Final EAs identified significant negative impacts that livestock grazing has had on soils, watersheds, riparian areas, wildlife, recreation and cultural and historical resources. As explained above, the agency's claims of solely positive impacts are not supported by any scientific basis, analysis or data. Indeed, grazing will continue similarly to how it has been done, there will be more fences, water developments and roads marring the landscape and impacting wildlife habitat connectivity, water quality and quantity, upland vegetation, watersheds and riparian areas. At a minimum, these impacts "may" be significant, requiring preparation of an EIS.

Suggested Remedy: Reinitiate the NEPA process to produce an EIS for this project.

d. The proposed action fails to protect streams and riparian areas

In our Draft EA comments we highlighted that "[m]any of these areas, including the San Francisco River, are supposed to be closed to grazing. Yet, over the past two decades, the Forest Service has repeatedly failed to meaningfully and effectively exclude livestock grazing from them, resulting in significant degradation and harm to fish and wildlife habitat. The proposed action must make substantial changes to grazing management and increase resources and monitoring to ensure cattle stay out of these sensitive areas." Draft EA Comments, p. 8.

In the Final EA the Forest says "[t]he proposed action continues to limit access to the San Francisco River." Final EA, p. 49. But access by livestock to the San Francisco River is not currently limited. The papers authorizing the current grazing management system may say that access is limited, but in reality, the Forest has systematically failed to maintain or ignored the infrastructure that once kept cattle out of riparian areas. This was not addressed in the Final EA.

In our Draft EA comments we presented the large body of research that documents the negative impacts of cattle grazing on riparian areas and soil and watershed health. See, Draft EA Comments, pp.8-9. We noted that "despite all of these well-known impacts and documented degraded conditions, the EA is devoid of site-specific information of the condition of riparian areas, streams and soils across the project area and glosses over any monitoring data, hiding the true harms that grazing has caused on the allotments covered by this project." *Id.* The Forest Service failed to address these comments, and this issue was not remedied in the Final EA.

Suggested Remedy: Issue an EIS to include site-specific monitoring data for streams and riparian areas, and incorporate into each alternative monitoring, maintenance, and funding plans for infrastructure that will, in fact, implement exclusion of livestock from riparian areas.

e. The EA Does Not Analyze A Sufficient Range of Alternatives

As we explained in our Draft EA comments, the "heart" of an EIS is the analysis of reasonable alternatives. 40 C.F.R. § 1502.14. An agency "should present the environmental impacts of the

proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis of choice among options by the decision-maker and public. *Id.* To comply with the regulations implementing NEPA, an agency must "rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14(a). "Without substantive, comparative environmental impact information regarding other possible courses of action, the ability of an EIS to inform agency deliberation and facilitate public involvement would be greatly degraded. *New Mexico ex rel. Richardson v. Bureau of Land Mgt.,* 565 F.3d 683, 708 (1 th Cir. 2009) (citing *Baltimore Gas and Elec. Co. v. Nat. Resources Def. Council, Inc.,* 462 U.S. 87 (1983)). *See* DEIS Comments, p. 7.
The EA does not resolve our concerns regarding the lack of an adequate range of alternatives. Indeed, the same issues are present. Similar to the Draft EA, there is only on alternative other than the "no action, no grazing alternative." Final EA, p.7. In our Draft EA comments we provided a number of actions suitable for inclusion in a more diverse range of alternatives.

Given the innumerable resources, the impacts of climate change, and the documented wolf-livestock conflicts, the Forest Service must analyze at least one more alternative that reduces these conflicts and protects and restores the invaluable cultural resources, riparian areas and streams, and threatened, endangered and sensitive species. Any action alternative must recognize the impacts of climate change on vegetation and water availability. Such an alternative must reduce AUMs and utilization levels, and keep water in streams and springs for wildlife instead of developing them for livestock.

EA Comments, p. 6. The Forest Service failed to incorporate any of our suggestions, and did not address our concerns in its response to comments.

Suggested Remedy: Prepare an EIS that includes an adequate range of alternatives that incorporates WildEarth Guardians' suggestions. Including, but not limited to:

- An alternative that eliminates grazing in wilderness areas
- An alternative that reduces stocking to average actual use levels from past permit term

f. <u>The Final EA includes a significant amount of development in Wilderness Areas and Inventoried Roadless Areas, and does not adequately assess the impacts of these developments on wilderness characteristics</u>

In our Draft EA comments we stated that "[i]nstead of further impairing the wilderness characteristics of these areas with more developments, the Forest Service should accept the voluntary waiver of the grazing permits and close the areas to livestock grazing." EA Comments, p. 7. The Forest Service failed to address these concerns in the Final EA, despite recognizing that "addressing possible effects to dispersed and developed campsites and general recreational activities" as a topic of concern raised by the public during the scoping and commenting process. Final EA, p. 7.

Indeed, instead of making necessary changes to the proposed action or providing a range of alternatives that includes no grazing in wilderness areas or IRA, the Forest Service insists on continuing grazing and installing more developments in these areas. In its analysis of the impacts of

the project on the recreational use of wilderness, the Forest admits that "[l]ivestock grazing may conflict with recreational use. It may displace visitors, make popular camping areas undesirable, and interfere with the wilderness experience. These social impacts are subjective and difficult to quantify." (EA p. 79). The Forest Service made no effort to quantify or analyze these impacts. Plus, these impacts violate the Forest Plan and NFMA. The current Forest Plan states that "new improvements will be provided only where and when they are essential to protect wilderness resources or public health." (Gila Forest Plan, p. 42)

The Forest explains at length how improvements built in the wilderness will improve ecological conditions but have a detrimental impact wilderness characteristics and admits that livestock grazing cannot be sustainably managed in wilderness areas while protecting wilderness characteristics. Final EA p. 85-88. This reason we urge the Forest to eliminate livestock grazing in wilderness areas, rather than continuing to place regulatory burdens on the agency and the permittee, destroying wilderness experiences for hikers and campers, and failing to fulfill its management obligations under the Wilderness Act and the Forest Plan.

Suggested Remedy: Prepare and EIS that includes the analysis of an alternative that eliminates grazing from wilderness areas.

2. Mexican Wolves, the ESA, and NFMA

We appreciate the Forest's inclusion of specific language about a few basic methods to reduce depredation. Final EA, p. 58. In our Draft EA comments we reminded the Forest Service of the following and we reiterate this statement here:

> The 2015 Mexican Wolf Rule, including the 10(j) non-essential experimental determination, was overturned and remanded to the United State Fish and Wildlife Service in April 2018 for revision (*WildEarth Guardians v U.S. DOJ*). The FWS was specifically directed to review the 10(j) non-essential determination. Accordingly, the Forest Service can no longer rely on the non-essential determination for Mexican wolf and cannot claim that livestock grazing is a specifically excluded activity under the 2015 rule. The Forest Service must analyze how livestock grazing and the agency's management of grazing, including removal of wolves due to livestock-wolf conflicts, adversely affects Mexican wolves, individually and the population as a whole.

Draft EA Comments, p. 7. In the Final EA, the Forest again declined to analyze the impacts of reauthorizing livestock grazing on the Mexican wolf.

Suggested Remedy: Issue an EIS that analyzes the impacts of livestock grazing on the Mexican wolf recovery effort, and that revises the grazing management system to protect Mexican wolves and reduce conflicts between wolves and livestock.

3. Economic Realities

In our Draft EA comments we highlighted that "the EA proposes spending over $1 million to construct new range developments but provides no fiscal or other assurances for maintaining or improving existing and new developments through their lifetime, and does not analyze the direct, indirect and cumulative impacts of these new developments." EA Comments, p. 9. The Forest addresses this concern by stating that "[i]t would take approximately 10 years at current grazing fees with full permitted numbers, or 13 years at recent actual use levels, to cover the cost of materials." Final EA p. 92. Accordingly, the agency's claims that the existing and proposed range "improvements" will be effective in improving conditions across the project area is not supported by the facts, because they will either not be constructed and, once they are, there is little to no funding to maintain them. This has been evident in the poor conditions of fences that are supposed to keep cows out of streams, but are not maintained.

We asked the Forest Service to

consider socio-economic impacts not only to permittees and local communities but also to the entire public now and in future generations, as they are the ultimate owners and inheritors of this land. Any consideration of the "lifestyle and culture" of ranching interests must be weighed explicitly against the "lifestyle and culture" of the far more numerous hikers, hunters, fishers, and professional or amateur mycologists, ornithologists, entomologists, herpetologists, botanists, mammalogists and other zoologists, wilderness lovers and bird watchers that frequent and enjoy the biodiversity and landscape of these allotments.

EA Comments, p. 14.

Yet, while the Forest Service provided detailed information (EA p. 93) about the contributions of AUMs and beef products to the economy, the agency did not contextualize these numbers with information about the total size of the economy or how the contributions of the livestock industry is changing or expected to change in comparison to other uses. Nor did the agency provide detailed information on the contributions of recreation, hunting and fishing to the local, regional and state-wide economy, and how grazing and range developments negative impacts these experiences and may dissuade people from using certain areas, particularly in wilderness and roadless areas, streams and riparian areas.

Suggested Remedy: Issue an EIS to include a detailed, itemized, and time-specific budget for the project and a contextual economic analysis of the impacts of this project on other economic uses of the public lands impacted by this project.

4. Climate Change

a. <u>The EA fails to adequately account for the projected impacts of climate change in the project area</u>

The EA must consider the cumulative impacts related to climate change. *Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1215 (9th Cir. 2008) (impact of greenhouse gas

("GHG") emissions on climate is precisely the kind of cumulative impacts that NEPA requires agencies to analyze); *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520 (8th Cir. 2003) (EIS was required to consider GHG emissions from project upgrading existing and new rail lines serving coal mines); *WildEarth Guardians v. Zinke*, 368 F. Supp. 3d 41 (D.D.C. 2019) (BLM violated NEPA by not adequately considering climate change when authorizing oil and gas leasing on federal land).

In our Draft EA comments we provided extensive evidence that the project area is already undergoing departures from the historical norm due to climate change. EA Comments, pp. 10-13. These departures include increased intensity and frequency of drought, reduced forage production, and a decrease in the reliability of water sources. We included multiple citations to USDA/USDOI reports that document both the ongoing and predicted impacts of climate change on rangeland resources and the livestock industry. *Id.*

The Forest Service failed to respond to these comments, and the Final EA contains no meaningful or data-driven analysis of either climate change on the project or the project on climate change. Final EA, pp.88-89. Specifically, it fails to take a hard look at how increased frequency and severity of drought, which the region has already been experiencing for close to two decades, have changed vegetative, stream, riparian and habitat conditions, and will affect the environmental impacts of the project. It also does not discuss the viability of water resources and how their disappearance due to climate change will impact livestock management and distribution.

The Gila bioregion, including the allotments in this proposal, is no doubt experiencing climate change that is exacerbating drought conditions unseen in recent generations. Such obvious changes will require adaptation on the part of rangeland managers. The proposed action and analysis in the EA wholly fail to address the impacts of climate change and the changing on-the-ground conditions, including, but not limited to, decreased forage, changes in native plant species presence and condition, dryer and more fragile soils, reduced water levels, higher water temperatures, increased fire risks, and invasive species. Issues that must be considered to address the impacts of climate change include utilization levels, turn-out and removal dates, AUMs, areas where grazing is no longer sustainable and thus should not be authorized, water developments, grazing in riparian, spring and wetland areas, impacts to native plant species, and impacts to fish, wildlife and other species and recreations. In sum, with the proposed action, the Forest Service has abdicated its responsibility to manage livestock grazing in a responsible manner in the face of climate change. It has the chance to do so and we look forward to working with you on this.

Here, there is no site-specific or cumulative impacts analysis of how climate change has affected, and is expected to further impact, vegetation, habitat, watersheds and other resources on the Gila and Apache-Sitgraves National Forests, or within the project area. Nor is there any analysis on how this project will improve conditions in light of a changing climate. What specific on-the-ground changes have occurred due to changing climatic conditions? More importantly, how have human-caused stressors such as roads, motorized use, livestock grazing, development and logging magnified the impact of climate change on forest resources? This must be analyzed in the EA.

Suggested Remedy: Prepare an EIS that identifies and provides site-specific analysis of the

baseline conditions in the project area due to climate change and human-caused stressors, analyze the cumulative impacts of the proposed project along with the impacts of climate change and all human-caused stressors,. Provide scientific justification for the assumptions made in EA.

Respectfully submitted by,

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