

From: [REDACTED]  
Sent: Monday, August 19, 2019 1:59 PM  
To: Ellett, Kent C -FS <kent.ellet@usda.gov>  
Subject: Stateline Range NEPA #22466

Gila National Forest  
Attn: Environmental Coordinator, Stateline Range NEPA Project  
Kent Ellett  
Glenwood Ranger District  
Box 9 , Glenwood, NM, 88039

To Whom:

I am a concerned New Mexico citizen writing to contribute my comments regarding the NEPA process for reauthorization of continued livestock grazing for the Apache-Sitgreaves National Forests (Alma Mesa, Blackjack , Copperas, Hickey, Keller Canyon, Lop Ear, and Pleasant Valley) and range allotments on the Gila National Forest (Alma, Citizen, Dry Creek, Holt Gulch, Pleasanton, Potholes, and Sacaton).

I support a no-action alternative and am concerned about grazing on the allotments in question for the following reasons:

- \* Destruction to valuable natural resources that could provide greater value as recreation and/or ecotourism: the National Forest habitat has been damaged on these allotments due to heavy use without cessation over a period of decades; especially near water sources
- \* The expense of cattle infrastructure improvements
- \* The Bureau of Forest Service's lack of implementation of Forest Service's guidelines and implementation of responsible grazing management practices specified by NEPA given the precedent the Secretary of Interior must comply with NEPA when designating critical habitat under the Endangered Species Act; and prior failings to[1]:
  - o Address areas of scientific controversy
  - o Address material public comments
  - o Consider the environmental effects of revised regulations

I am concerned specifically for the proposed wells at Big Dry Pasture in Dry Creek and at Mulligan Peak Allotments because they will:


- \* Attract cattle, which is in direct conflict with natural species and their habitat there (e.g., by requiring the elimination of cattle predators like bears and mountain lions and potentially threatening the threatened "hellbender" salamander species)
- \* Inadvertently increase grazing pressure on the nearby open meadow, a popular camping site
- \* Inadvertently increase hydrological contamination to the exposed water table
- \* Shift burdens of water provision to native habitat, i.e., if a well is required for cattle, likely native species are also not receiving sufficient drinking water
- \* Inadvertently increase impervious surfaces and runoff pressures due to the increase of traffic that would be required for installation and maintenance and result from use, not to mention the similar damage from tree removal during installation
- \* Overall, cause the land to have a more barren appearance and affect

recreational attractiveness in the area similar to what has already happened because of tank placement at the Sundial Pasture and the Sheridan Corral Area

I implore the Clifton and Glenwood Ranger Districts to consider actions such as were implemented for the Deep Creek Ranch in the Gila National Forest. In this case, ranch owners were compensated by the WildEarth Guardians, a non-profit organization[2]. There must be some interest by ranchers in the area of the Clifton and Glenwood Ranger Districts in the voluntary grazing permit retirement program. This program could help our areas of the Greater Gila, a national conservation treasure, to be less plagued by drought, wildfire, and endangered species challenges and give the land time to heal.

With Respect,

Rebe Feraldi, New Mexico Citizen




[1] Per Catron County Board of Commissioners, New Mexico v. United States Fish and Wildlife Service, 75 F. 3d 1429 (10th Cir. 1996); also see similar precedents: Public Lands Council v United States Department of Interior, 929 F. Supp. 1436 (D. Wyo 1996), aff'd in part and rev'd in part sub nom. Public Lands Council v Babbitt, 167 F. 3d 1287 (10th Cir. 1999), aff'd, 529 US 728 (2000); Excerpt from NEPA litigation: the causes, effects, and solutions: oversight hearing before the Committee on Resources, US House of Representatives, One Hundred Ninth Congress, first session, Thursday, November 10, 2005 at: <https://www.gpo.gov/fdsys/pkg/CHRG-109hhr24546/html/CHRG-109hhr24546.htm>.

[2] See relevant news at:

<http://www.wildearthguardians.org/site/News2?page=NewsArticle&id=10287#.W17RTainFPY>.

--

Rebe Feraldi, LCACP, CLAR



CONFIDENTIALITY NOTE: This email message and its attachments contain work product or other information which is privileged, confidential and/or protected from disclosure. This information is intended only for the use of the individual or entity named above. If you think that you have received this message in error, please email or phone the sender. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

