

January 7, 2022

Ms. Celeste Kinsey, District Ranger
Sierra Vista Ranger District, Coronado NF
4070 S. Avenida Saracino
Hereford, AZ 85615

Dear Ms. Kinsey,

This is an objection, as per 36 CFR Part 218, of your December 1, 2021, draft decision notice for the Canelo Hills Allotments Analysis Project. On September 9, 2019, your office issued a draft environmental assessment (EA) for this project for public comment. On October 7, 2019, I responded with written comments about it.

Before I specify my objections to your draft decision notice, the recent history of livestock management on these allotments needs to be described, as a lot of it isn't included in the project's final EA.

In 2001 the grazing permittees for the Crittenden, Kunde, Papago & O'Donnell allotments participated in the formation of the Canelo Hills Coalition. It's a group of area grazing permittees that was organized in response to grazing restrictions which were being implemented on local Coronado National Forest grazing allotments in order to protect riparian habitat that was home to endangered Gila topminnow (*Poeciliopsis occidentalis*) - particularly in Redrock Canyon.

At this same time, a decline in the local Gila topminnow populations had been noticed. Grazing in Redrock Canyon had previously been restricted to the winter season to protect the fish's riparian habitat. But the fish's population decline resulted in grazing being completely excluded from the Kunde allotment's Redrock pasture in 2004. Also, in 2008 the Bureau of Reclamation completed an environmental assessment (EA) of a proposed fish barrier to keep nonnative mosquito fish, which outcompete Gila topminnows, out of Redrock Canyon. But the Gila topminnow decline continued and the last time they were found in Redrock Canyon was 2005. Subsequently, the fish barrier was never built. The extirpation of the topminnows was attributed to drought and the introduction of mosquito fish by unknown persons.

In the meantime, the ranchers of the Canelo Hills Coalition were fighting back. In 1999 the Coronado National Forest had released a NEPA scoping notice about proposed livestock management plans for the Seibold, Crittenden, Kunde, Papago allotments, along with the Manila, Canelo and Lyle Canyon grazing allotments. But when the subsequent EA for the project was released in 2001, the Seibold, Crittenden, Kunde, and Papago allotments weren't included. (The Seibold allotment is now included in the Crittenden allotment.)

But apparently that didn't stop the permittees for the Crittenden, Kunde, and Papago allotments from being able to acquire large amounts of government assistance to build new livestock waters and fences to help them maximize the number of cattle they could keep on the land. The table below shows that since 2002 they have received at least \$542,070 to help pay for new livestock management infrastructure. And there was almost certainly more. (Source: <https://azgrazingclearinghouse.org/arizona-public-land-ranches/>)

YEARS	PROGRAM	AMOUNT	Crittenden	Kunde	Papago & O'Donnell
2002	WQIG #4-103	\$55,546	x		
2005	WQIG #7-008	\$249,302	shared	shared	shared
2005	LCCGP #05-20	\$26,898	x		
2006	WQIG #8-012	\$52,500	shared		
2006-2008	EQIP	\$18,400	x		
2007	LCCGP #07-10	\$12,000	x		
2009	LCCGP #09-91	\$100,000		x	
2012-2014	EQIP	\$27,424			x
	TOTAL	\$542,070			

KEY: WQIG - Arizona Water Quality Improvement Grant, LCCGP - Arizona Livestock & Crop Conservation Program, EQIP - NRCS Environmental Quality Incentives Program

In effect, these range "improvements" facilitated the implementation of new allotment management plans. But as far as I can tell, they were not subjected to any NEPA analysis. Please clarify if my summary of the recent history of these allotments is inaccurate.

In regards to your recent draft decision, one of its primary features is the proposal to build even more range improvements on these allotments. The accompanying final EA fails to reveal their estimated cost, but the long lists of projects found on pages 11 & 12 of the EA indicate that it would be in the hundreds of thousands of dollars. Since the majority of this money would likely come from government assistance programs, what would the public have to gain from these expenditures?

A comparison of Table 1 in the EA, which lists the currently permitted number of cattle, with Table 2, which lists the proposed permitted numbers, shows that a couple of the permittees would benefit in the form of increased permitted cattle

numbers. The Kinde allotment would gain 22 head, and the Papago & O'Donnell allotments, which have the same permittee, would gain 150 head. But there would be little benefit to the public from these increases.

This second round of subsidies and the resultant increases in permitted numbers are being proposed even though Table 1 also shows that, despite the previous expenditure of more than half a million dollars in government assistance, the actual use of the Crittenden, Papago, and O'Donnell allotments during the last several years was less than the permitted cattle use because of ongoing drought. (It also shows the Kunde allotment was fully stocked in recent years. But according to the June 2, 2009, scoping letter issued from your office about your initial proposal to allow grazing to resume in the allotment's Redrock pasture, that was probably because three pastures from the adjacent Weiland allotment were added to it in 2008.)

Arizona has been experiencing a "megadrought" for more than 20 years, and climatologists are telling us that Arizona will continue to get hotter and drier due to ongoing climate change primarily caused by the burning of fossil fuels. Scientists are also telling us that we have entered an Anthropocene epoch, wherein the human impact on the Earth's ecosystems has created an unprecedented increase in the rate of the extinction of species. Considering these realities, it's pretty sad and ridiculous that your agency's priority seems to be to facilitate more subsidies to try and keep a few ranchers in business, no matter how much it might cost the taxpayers.

In conclusion, I object to your draft decision because it violates the Multiple-Use Sustained-Yield Act of 1960, which requires that:

"management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people"

The proposed decision violates this law because it would facilitate another round of government subsidies that would only benefit a few grazing permittees by helping them to increase their cattle numbers. In other words, it's a result of distorted management priorities.

I suggest that you should not have eliminated the "Reduce Livestock Numbers" alternative from NEPA analysis because the simplest and least expensive solution to the grazing management situation on these allotments is to authorize fewer cattle to graze them.

Furthermore, the public monies that would be spent on the proposed new ranching infrastructure would benefit the public more by being spent on taking the measures necessary to reintroduced endangered Gila topminnows into Redrock Canyon.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Burgess', with a stylized flourish at the end.

Jeff Burgess

