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Title:
Comments: Wildbunch AMP Objection

Mr. Stephen Best, Supervisor

Apache-Sitgreaves National Forests

P.O. Box 640

Springerville, AZ 85938

Dear Mr. Best,

This is my objection, as per 36 CFR Part 218, to the draft decision notice legally published on August 8, 2018, by Clifton District Ranger Ed Holloway Jr. for the Wildbunch Allotment Management Plan (AMP).

On June 25, 2006, I submitted written comments on the 2006 draft environmental assessment (EA) for this project. And on November 23, 2014, I submitted more comments on the subsequent 2014 draft EA.

I raised my concerns about protecting this allotment's important perennial riparian areas from grazing in both letters, and in 2014 I specifically raised the issue of whether or not the cattle exclosure on the Blue River was being adequately maintained.

The Clifton Ranger District's response to that inquiry was to claim that, "The comment pertains to an ongoing administrative issue as opposed to the proposed action." But that was a ridiculous excuse for two reasons.

First, the entire validity of the proposed AMP is based upon the assumption that cattle have been excluded from the stretch of the Blue River that's on this allotment. A failure to keep cattle out of the river, for example, violates your 1998 legal settlement with the Center for Biological Diversity that brought your forest's grazing management program into compliance with the Endangered Species Act.

Second, recent field trips to the Wildbunch allotment by staff of the Center for Biological Diversity have

discovered that the exclosure on the Blue River has not been adequately maintained and trespass cattle are damaging the riparian habitat along the stream.

Therefore, I am objecting to the decision to implement the proposed Wildbunch AMP because:

1. The environmental assessment is inadequate because it fails to discuss the history of the maintenance of the Blue River riparian exclosure.

2. The Apache-Sitrgeaves National Forests are in violation of the Endangered Species Act for failing to maintain the Blue River riparian exclosure.

Sincerely,

Jeff Burgess

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