Data Submitted (UTC 11): 7/20/2018 5:53:02 AM
First name: Joe
Last name: Trudeau
Organization:
Title:
Comments: NMMJM Sacramento EA

To the staff and decision-makers on the Lincoln National Forest,
It is with great pleasure that I provide comments on the Draft EA for the New Mexico Meadow Jumping Mouse (the "mouse") Habitat Improvement Projects on the Sacramento Grazing Allotment. Please accept this letter on behalf of the 1.6 million members and supporters of the Center for Biological Diversity (The "Center"), who value wildlife, wild places, and a future for people that is not diminished by a legacy of land management decisions driven by greed and profit. The Draft EA is exceptionally well written and comprehensive in its scope. We commend the Lincoln NF for this quality document.
The situation on the Sacramento Allotment is a perfect example of the tension between what is right, and what is a greedy and self-serving action. On the Sacramento Allotment, a mere 100 acres out of 111,484 are proposed for exclosure fencing. If a rancher can't manage this extremely trivial amount of allocation for protected critical habitat, then he should probably quit ranching and experience what it's like for the rest of society who aren't subsidized by a system catering to takers like him.
The Center believes that all species deserve a fighting chance to survive, even the smallest and most unassuming species, such as the New Mexico meadow jumping mouse. On the Sacramento, and in fact across the entire Sacramento Mountains, the livestock industry has portrayed itself as a victim of government overreach, and they are eager to see the little mouse driven to extirpation. Don't believe these welfare kings and queens, who suckle daily on the teet of the USDA and its systematized propping up of an antiquated and dying industry. These ranchers are destroying the public lands and your own data show it: on page 34 of the Draft EA you cite the decrease in riparian vegetation over the last few decades. Why do these privileged few get to do this?
A commenter in scoping claimed that there are no mice present so there shouldn't be any habitat protection projects such as this. What they don't admit is that their own cattle are the cause of the decline of the mouse in the Sacramento Mountains. In fact, most of the arguments they bring up are ridiculous. As for the purported lack of mice, I suspect they have not done any surveys themselves and they should let the professional make that determination.
I certainly don't envy you, my Forest Service friends, right now. You will be the rancher's punching bag through this effort to do the right thing for the mouse on the Sacramento Allotment. But you have the law on your side. Let me repeat that: You have the law on your side. If the law wasn't on your side, then crony anti-government zealots like Congressman Steve Pearce wouldn't have tried to change it today with his bogus amendment to the Interior Appropriations Bill, which would have prevented funds from being used to treat the New Mexico Meadow Jumping Mouse as an endangered species. Poor Mr. Pearce, his amendment FAILED because even our anti-ESA congress can see that it's a futile effort to attempt to stop the Forest Service from doing the right thing for this critically endangered mouse. So when Steve Pearce comes knocking on the Ranger Districts door, don't be afraid of his sorrowful attempts to circumvent the law. You have the upper hand as the agency charged with the protection and recovery of this species.
The map shown on page 17 of the Draft EA is exactly what the world should see. Here, we have a huge allotment that is treated as private land by an abusive rancher, and the proposed mouse critical habitat project areas which are a tiny, almost unnoticeable portion of the allotment. Again, if a rancher can't deal with such an extremely small portion of their LEASED lands being used for a valid and legally allowable use then they obviously need to learn how to raise cows in a more effective manner.
The Forest Service has the obligation to take steps to recover the mouse on its lands. You made this clear in the first paragraph of your scoping letter for this project. Yes, these are US Forest Service lands in question, NOT PRIVATE LANDS. I and the 1.6 million Americans who I represent in this letter are owners of that land. We say that "Multiple Use" includes a whole lot more than running giardia-laden bovines around crushing endangered mice under their hooves. Multiple use means protecting wildlife, watersheds, and recreational lands too. Perhaps

any permittee that questions this should read their permit closer. You have the law on your side, so make the right decision. Don't let the self-interested industry hacks push you around.

As much as we support your efforts, your proposed actions don't go far enough. I'll ask you to refer to the letter I sent in scoping on the Agua Chiquita habitat project. The amount of the meadows that you have proposed for grazing restrictions is insufficient based in the stated habitat needs that we cited in that letter. In the Sacramento project I see the same deficiencies as the Agua Chiquita. Again, refer to our letter on that project, which applies closely to this action. You can do the right thing. Protect MORE habitat, both in the riparian and in the adjacent uplands. If you don't protect more habitat than is proposed, then the mouse is likely to continue its tragic decline towards extirpation, and then sadly the Forest service will be complicit too. We request that the Final EA consider at least twice the exclosure area that you currently have proposed. We don't believe that just 100 acres will do the job. In order to recover the mouse, unoccupied habitat must be protected from grazing to allow the mouse to expand. An island of tall grass in a sea of destroyed and grazed-to-stubble meadow will not allow the mouse to recover. We agree with the points brought forward in scoping by Defenders of Wildlife and Wild Earth Guardians and restate them here by reference.

We sincerely hope that the anti-government, free-market types who are responsible for the demise of the mouse will be paying for their self-serving construction of additional corrals, traps, storages, troughs, pipelines, and water developments that this EA would authorize. Certainly, the American taxpayer should not be responsible for compensating for the mess the livestock industry has imposed on them. If the permittee and/or their associations need assistance to complete their self-serving range improvements, there are a number of banks in Alamogordo eager to make loans to small businesses. However, financially insolvent operations like arid-lands ranches may not be a good investment.

We are glad that the Draft EA points out the unauthorized 1,900-foot long pipeline and cement spring box constructed at a thistle site near Bluff Springs. What type of person would do this; illegally installing nearly a half-mile of pipeline to siphon off public waters for their own use? We are hopeful that the Forest Service will recognize that the livestock industry doesn't have the interest of the public lands in mind, only their own interests. These abusive ranchers and their phony cronies in political positions are greedy hounds that just take, and never give back.

The US Forest Service has a duty and obligation to recover species on their jurisdiction under the ESA. We believe that the proposed project, while not going far enough, will move in the right direction. As you are likely well aware, the Center has submitted a FOIA for information pertaining to the proposed action, as well as management of mouse habitat across the 4 allotments where the mouse occurs on the Sacramento Mountains. A key component of that request was in regards to Forest Service compliance with USFWS Sec. 7 Consultation terms and conditions. We will be closely inspecting the final EA for clear indication that those terms will be followed closely.

The Forest Service understands that a healthy mouse population is an indicator of properly functioning watersheds and riparian areas; the scoping letter and Draft EA make this connection. To allow special interests to push the mouse further towards extirpation is in direct conflict with the charge of your forest plan, the ESA, and the moral charge of your agency. The Forest Service must do more to recover the mouse, including the proposed action, and then far beyond this.

The Center eagerly awaits your next move on this project, and supports the efforts underway to recover this species and improve the terribly degraded and overgrazed riparian systems on the Sacramento Allotment.

Please do not hesitate to contact me and please keep me informed of any opportunities for public involvement.

Respectfully yours,

Joe Trudeau, Southwest Advocate
Center for Biological Diversity
PO Box 1013, Prescott, Arizona 86302
jtrudeau@biologicaldiversity.org
(cell) 603-562-6226