

File Code: 1570

Date: September 22, 1999

Karen Budd-Falen
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CERTIFIED MAIL - RRR

RE: Appeal for the Hall Family Trust (1999-03-06-0003-A251)

Dear Ms. Budd-Falen:

This is my review decision on the appeal you filed on behalf of the Hall Family Trust, Wilderness District Ranger's decision on the Amended Annual Operating Plan for the Sapillo Allotment located within the Wilderness Ranger District. My review of this appeal has been conducted pursuant to and in accordance with 36 CFR 251.80.

BACKGROUND

On February 3, 1999, the U.S. Fish and Wildlife Service delivered a final Biological Opinion to the Forest Service examining the impacts of grazing on the Sapillo Grazing Allotment located on the Wilderness Ranger District.

On February 19, 1999, Acting District Ranger Jerald D. Payne issued an Annual Operating Plan to the Hall Family Trust for the Sapillo Grazing Allotment. This AOP included instructions for implementing reasonable and prudent measures identified in the Biological Opinion prepared by the U.S. Fish and Wildlife Service for on-going grazing on the Sapillo Allotment located on the Wilderness Ranger District.

On April 5, 1999, a Notice of Appeal was filed by Attorney John M. McCall on Acting District Ranger Jerald D. Payne's February 19, 1999 decision to issue an AOP to the Hall Family Trust for grazing on the Sapillo Allotment.

On April 6, 1999, Acting District Ranger Annette Chavez received a letter from the Hall Family Trust requesting permission be granted to allow the Trust to move their cattle from the Sapillo Allotment to the Elk Pasture on the Mimbres Allotment located on the Wilderness Ranger District.

On April 6, 1999, Acting District Ranger Annette Chavez approved the Hall Family Trust request and amended the AOP which authorized their grazing on the Mimbres Allotment.

On April 12, 1999, the appeal and request for Stay of the Decision on behalf of the Hall Family Trust was dismissed by Forest Supervisor Abel M. Camarena. The basis for withdrawing the decision was because a new decision was issued on April 6, 1999 by Acting District Ranger Annette Chavez, which amended the AOP and withdrew the AOP dated 2/19/99.

On May 20, 1999, a Notice of Appeal as filed by Attorney John M. McCall on Acting District Ranger Annette Chavez's April 6, 1999 decision to amend the Hall Family Trust's AOP.

On June 4, 1999, a letter was filed by Attorney John M. McCall regarding alleged intent by the Forest Service to withdraw the April 6, 1999 decision.

On June 11, 1999, District Ranger Annette Chavez informed Attorney John M. McCall that she had no intention of withdrawing the April 6, 1999 decision.

On June 11, 1999, Forest Supervisor Abel Camarena acknowledged receipt of and acceptance of appeal by Attorney John M. McCall.

On July 6, 1999, Reviewing Officer Abel Camarena received reply to District Ranger Chavez's responsive statement from John McCall of Budd-Falen Law Offices.

On July 8, 1999, Reviewing Officer Abel Camarena closed the appeal record.

APPEAL SUMMARY

Appellants' issues are being addressed as organized in the Notice of Appeal. These consisted of eleven major issues with subparts incorporated within each major issue. Separate issues raised in reply to Responsive Statement are addressed following evaluation of original appeal points.

FINDINGS

The following is my evaluation and response to each of the subparts within each of the major issues.

Issue A: The Consultation Agreement was Improper, Arbitrary and Capricious, and in Violation of the Law.

1. The Forest Service violated the Endangered Species Act and the Administrative Procedures Act by entering into the Consultation Agreement.

Contention: The Appellant contends that completion of a Section 7 Consultation for proposed species and proposed critical habitat falls outside the jurisdiction of the Forest Service, pursuant to the ESA, and as such, the Forest Service has violated the ESA and the Administrative Procedures Act.

Response: In accordance to Section 1536 ESA, Section 7(a)(2), each federal agency shall, in consultation with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered or threatened species, or result in the destruction or adverse modification of habitat of each

species which are determined by the Secretary. Furthermore, according to 50 C.F.R § 402.10(a), the Forest Service shall confer with the U.S. Fish and Wildlife Service (FWS) on any action which is likely to adversely affect the continued existence of any **proposed species or result in the destruction or adverse modification of proposed critical habitat**. This is not a violation of the ESA nor of the APA.

The District Ranger is affirmed on this issue.

2. The Forest Service violated the ESA and APA by Failing to Permit Grazing Permittees to Participate in the Formulation of the Biological Assessment Under the Consultation Agreement.

Contention: The Appellant contends the Forest Service failed to permit those with applicant status, including the Trust, to participate in the Formulation of the Biological Assessment, and as such, failed to follow mandatory regulations at 50 C.F.R. Part 402. The Appellant contends the Forest Service's failure to follow these regulations is a violation of the ESA and the APA.

Response: There is no provision in the statute or regulation that requires the agency to allow the permittee to participate in the development of a biological assessment (BA). Pursuant to Section 7(c)(1) of ESA, regarding BA's, the only role that applicants have in BA's is that they shall be notified of time extensions and reasons for extensions needed by the agency to complete the BA.

The Consultation Agreement stated that the Forest Service will provide notification to all affected permittees regarding their opportunity to participate in this (consultation) process as applicants. There is no requirement in the Consultation Procedures (50 C.F.R. Part 402, Subpart B) that applicants are guaranteed a role in the preparation of the Biological Assessment. Those permittees whose on-going activities received a "may affect, likely to adversely affect" determination were granted applicant status and given the opportunity to comment on the draft biological opinion.

Based on the record, the permittee was provided an opportunity to comment on the Draft Biological Opinion.

The District Ranger is affirmed on this issue.

3. The Consultation Agreement violates the APA by Forcing Changes to be Made Through Allotment Management Plans.

Contention: The Appellant contends that implementation of mandatory changes resulting from the Section 7 Consultation through a discretionary AMP document is arbitrary and capricious under the APA.

Response: The Consultation Agreement does not state that the Forest Service Biological Evaluation or Assessment and FWS Biological Opinions are implemented through the allotment management plans (AMPs). A review of the record does not indicate any changes to the AMP, only the Annual Operating Plan. The Forest Service does have the discretion to direct temporary

changes to the grazing regime through Annual Operating Plans (Grazing Permit Part 1-3, Part 2(a)(b) and (c): Forest Service Manual 2212.3, 2231.6, 2231.61, R3 Supplement 2231.41: Forest Service Handbook 2209.13, Sections 16, 16.1, 16.11, 16.13, 16.15, and 93.2).

The District Ranger is affirmed on this issue.

Issue B: The Decision Requiring a Range Rider or Construction of Fences on Pastures with River Access was Improper, Arbitrary and Capricious, and in Violation of the Law.

Contention: The Appellant contends the Forest Service did not gather any scientific data nor analyze the need for a reduction in livestock and a range rider or alternatively the construction of fences prior to issuing its decision. Thus, the Forest Service was not in compliance with the ESA and violated the APA by amending the Trusts' AOP without scientific justification.

Response: In review of the record, the U.S. Fish and Wildlife Service delivered a final Biological Opinion to the Forest Service, examining impact of livestock grazing on the Sapillo Allotment. This opinion was determined based on information the Forest Service has provided in their Biological Assessment. The Biological Opinion concluded from this information that on-going livestock grazing on the Sapillo Allotment is likely to jeopardize the continued existence of two species of fish; the loach minnow and spikedace. The Biological Opinion included a reasonable and prudent alternative which, when fully implemented would avoid jeopardy. This BO does site specific scientific evidence for the opinion.

The AOP issued by the Forest Service to the Hall Family Trust included the following reasonable and prudent alternatives taken from the BO: 1) a maximum of 25% use on herbaceous forage will be permitted. When forage use levels are met, livestock are to be removed from the pasture or allotment; and 2) as soon as possible, but no later than March 1999, all livestock shall be excluded from Black Canyon and the stream corridors of Sapillo Creek and Apache Creek.

The direction to construct fences was not given in the AOP, rather the AOP instructed exclusion of cattle by use of a range rider.

As per 50 C.F.R. 402.14(h)(3), a jeopardy Biological Opinion shall include reasonable and prudent alternatives, if any. In addition, the Term Grazing Permit specifically Part 1, Section 2 and 3 and Part 2, Sections 8(a)(b) and (c), provide Forest Officers with broad discretion to issue annual operating instructions in the form of AOPs to permittees as needed for resource protection.

The District Ranger is affirmed on this issue.

1. The Forest Service Failed to Complete a Required NEPA Analysis Before Issuing its Decision.

Contention: The Appellant contends the Forest Service violated NEPA by not seeking input from affected permittees and other interested publics to exclude livestock access to river areas and require a range rider and/or fencing.

Response: Pending completion of site specific NEPA and the preparation of allotment management plans, administration of grazing permits is accomplished through annual instruction to permittees (annual operating plans or AOPs). The management actions taken, were needed to comply with the findings of informal consultation with the FWS and the effects of on-going grazing activities on federally protected species and/or their habitats. As previously discussed (B1), the final Biological Opinion issued by the FWS identified reasonable and prudent alternatives which, when fully implemented, will avoid jeopardy. The FS has the authority and discretion to implement temporary grazing management changes on an annual basis through use of AOP's or annual grazing instructions if there are resource concerns related to livestock grazing, as well as other resource issues. See Response to Issue A-3. Any decision to construct new fences would have to be preceded by appropriate NEPA analysis. No such decision has been made.

The District Ranger is affirmed on this issue.

Issue C: The Forest Service Failed to Complete a Required Taking Implication Analysis.

Contention: The Appellant contends by requiring fence construction and removal of livestock from pastures with river access, the Forest Service has destroyed the value of private property water rights. The Appellant contends this is a taking governed by the Fifth Amendment of the U.S. Constitution.

Response: Neither the Settlement Agreement nor the amended AOP requiring livestock removal from pastures with river access, "take" any personal property, including water rights; therefore, no "taking implications assessment" is required. Livestock watering in the rivers is considered incidental use and is covered under New Mexico Statutes 1978 Annotated, Chapter 72, Water Law 72-1-6 Traveler's Use of Water. According to the appeal record and responsive statement, water rights held by the Hall Family Trust are not impaired in any way by the amended AOP.

The District Ranger is affirmed on this issue.

Issue D: The Forest Service Did Not Have Authority to Issue the Decision.

Contention: The appellant contends the Forest Service lacked valid ground and did not have authority for modifying the terms or conditions of the Hall Family Trust permit.

Response: See response to Issue A-3 and B. The permittee's grazing permit was not modified. Forest Office instructions were in accord with existing grazing permit stipulations.

The District Ranger is affirmed on this issue.

Issue E: The Biological Opinion Violates the Endangered Species Act Because It Is Not Based On the Best Scientific and Commercial Data Available.

1. Time Restrictions Preclude Consideration of Proper Data.

Contention: The Appellant asserts that time restrictions in developing the Biological Opinion precluded consideration of the best scientific and commercial data available.

Response: This is conjecture by the Appellant. Formal Consultation, as identified in 50 CFR 402.14(a)(c), was entered into and the preparation of a Biological Opinion was determined and completed by regulation identified in 50 CFR 402.14(e)(f).

The District Ranger is affirmed on this issue.

2. The Guidance Criteria is Not the Best Scientific and Commercial Data Available.

Contention: The request by which the Forest Service initiated formal consultation included a compilation designated "Guidance Criteria for Preliminary:". Appellant asserts the Forest Service and FWS reliance on the Guidance Criteria precluded consideration of the best scientific and commercial data available.

Response: The record indicates a site specific Biological Assessment was prepared for the Sapillo Allotment by Forest Service Biologist. The Biological Assessment included recent information regarding soil, watershed and vegetative conditions. This information was gathered by Forest Service Soil Scientist, Hydrologist, and Range Specialist. Terrestrial Ecosystem surveys were conducted in 1997 and 1998 for the allotment and 6 permanent range clusters were read and analyzed. In addition, numerous field inspections were conducted. The Biological Assessment presented to the FWS was utilized in developing the Biological Opinion.

The District Ranger is affirmed on this issue.

3. Photographs are Not the Best Scientific or Commercial Data Available.

Contention: The appellant contends photos must have constituted a significant foundation for the BA. Further, photos are an inadequate substitution for observations of field going personnel, and do not constitute the best scientific and commercial data available.

Response: The record indicates that field observations in conjunction with photographs were used in preparation of the Biological Assessment. The Appellant is in error in determining that photographs constitute a significant foundation for the Biological Assessment and substituted for observations of field going personnel. See response to Issue E-2.

The District Ranger is affirmed on this issue.

4. The Biological Opinion Determined Effects Based on Generalizations Which Fail to Incorporate the Best Scientific and Commercial Data Available.

Contention: The Appellant contends that the effects determinations are flawed by the data employed to establish the causal relationships. For example, the Appellant cites the BO for the Sapillo Allotment indicates a degraded upland soil condition, and states this is based on TES

information which incorporates the Universal Soil Loss Equation. The Appellant states that individuals with expertise in soils science state that the referenced equation is not a reliable indicator of soils conditions.

Response: It is true that TES surveys were conducted on the Sapillo Allotment prior to the decision. These surveys were conducted by a trained Soil Scientist. In addition, trained Range Scientists conducted surveys with observations of decreased plant density (75%), increased bare soil (16%) and an increase in woody vegetation litter (juniper and pine) by 25%, all of which indicate associated problems with the watershed and soil loss. This recent scientific information was used in preparation of the Biological Opinion by the FWS. Within the BO, there is no reference made to degraded soil conditions based on TES information which incorporates the Universal Soil Loss Equation. However, the BO states on page 289, 4th paragraph "in 1996, range vegetation transects in key areas were read and compared with data collected in 1977".

The District Ranger is affirmed on this issue.

5. Data Underlying Trend Analysis is Incomplete.

Contention: The appellant contends the trend established for the Sapillo Allotment compares data generated in 1977 with data generated in 1996 and states this comparison is scientifically incompetent to support the purported trend. Further, the Forest Service should have generated additional data to document allotment conditions for recent years.

Response: The Federal agency requesting formal consultation shall provide the Service with the best scientific and commercial data available or which can be obtained during the consultation for an adequate review of the effects that an action may have upon listed species or critical habitat (50 CFR 402.14[d]). In addition, when the Service determines that additional data would provide a better information base from which to formulate a biological opinion, the Director may request an extension of formal consultation and request that the Federal agency obtain additional data to determine how or to what extent the action may affect listed species or critical habitat (50 CFR 402.14[f]). The Forest Service provided recent scientific data, which was identified in the Biological Assessment, to the FWS and the Service did not request additional information in developing the Biological Opinion. The Forest Service also provided the Hall Family Trust with the opportunity to submit additional information for consideration during the consultation process. No additional information was provided by the Trust. In review of the record, adequate information was provided the FWS in making their determination in the Biological Opinion.

The District Ranger is affirmed on this issue.

6. The Data Cited Does Not Support the BO or Reasonable and Prudent Measures.

Contention: The Appellant contends the reasonable and prudent measures proposed by the FWS are unreasonable and ignore the best scientific and commercial data available.

Response: Reference is made to 50 CFR 402.14 (g)(h). It is the Service's responsibility to develop reasonable and prudent measures, if any, which are provided to the agency in the Biological Opinion. Therefore, it is outside the Forest Service's control to dictate the reasonable and prudent measures.

The District Ranger is affirmed on this issue.

Issue F. The Biological Opinion Illegally Considers Proposed Species.

Contention: The Appellant contends the consultation contravenes the ESA to the extent it considers "proposed species".

Reference Issue A-1 for response. It is the responsibility of the Fish and Wildlife Service to issue the Biological Opinion, not the Forest Service.

The District Ranger is affirmed on this issue.

Issue G. The Biological Opinion Considers Habitat Which is Not Protected Under ESA.

Contention: The Appellant contends the consultation contravenes the ESA to the extent it considers effects on other than critical habitat.

Response: The Biological Opinion lists the individual allotments under consultation, the species and critical habitat for which determinations were made, and the U.S. Fish and Wildlife Service's biological opinion or concurrence for each species or critical habitat by allotment considered in the Biological Opinion.

On the Sapillo Allotment, the BO lists Loach minnow, Spikedace and Mexican spotted owl as the **species** consulted on, not habitat. No other effects determinations were made.

The District Ranger is affirmed on this issue.

1. Consideration of Effects to Habitat of Listed Species as a Proxy.

Contention: The Appellant contends the FWS made many effect determinations, specified reasonable and prudent alternatives, and calculated take, based exclusively on habitat factors; thus violating the ESA.

Response: As per 50 CFR 402.14 (g) (h), the responsibility for preparation of a Biological Opinion and reasonable and prudent alternative is the U.S. Fish and Wildlife Service. Therefore, this issue is outside the scope of this response and appeal.

The District Ranger is affirmed on this issue.

2. Consideration of Potential Habitat.

Contention: The Appellant contends the Forest Service may have consulted with regard to potential habitat and suitable unoccupied habitat; thus, violating ESA.

Response: See response to G above

The District Ranger is affirmed on this issue.

H. The FWS Violated the National Environmental Policy Act in Developing the BO.

Contention: The Appellant contends the FWS must complete an Environmental Impact Statement; or, at the very least, an environmental assessment which analyzes the impacts of the proposed actions on the human environment.

Response: As per 50 CFR 402.14(g)(h), the responsibility for preparation of a Biological Opinion and reasonable and prudent alternatives is the U.S. Fish and Wildlife Service. Therefore, this issue is outside the scope of this response and appeal.

The District Ranger is affirmed on this issue.

I. The Agencies Failed to Comply With Procedural Mandates of the ESA.

Contention: The Appellant contends the Trust must trigger the request for formal consultation. In addition, the Appellant claims the Trust was not allowed to participate in any phase of the consultation; therefore, the Forest Service violated the ESA.

Response: The Appellant is incorrect. There is no requirement in Statute 16 USC 1536 that prevents the Federal Agency from initiating formal consultation. USC 1536(a)(2) states, "each Federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency, is not likely to jeopardize the continued existence of any endangered species or threatened species....etc".

Regarding the Appellant's claim pertaining to participation, refer to response A-2.

The District Ranger is affirmed on this issue.

J. The Biological Opinion And Decision Will Compel The Forest Service To Violate Numerous Substantive Laws.

1. The Multiple Use-Sustained Yield Act.

Contention: The Appellant contends the Biological Opinion and Decision needlessly elevates wildlife and fish values over range purposes.

Response: This statement calls for conjecture. The BO and AOP continue to provide for livestock grazing with reasonable and prudent alternatives.

The District Ranger is affirmed on this issue.

2. The National Forest Management Act.

Contention: The Appellant contends the BO and Decision subordinate range purposes to wildlife purposes in contravention of NFMA.

Response: Contrary to the Appellant's statement, the BO and AOP incorporate wildlife values into a grazing management decision. This is in conformance with NFMA.

The District Ranger is affirmed on this issue.

3. The Granger-Thye Act and Implementing Regulations.

Contention: The Appellant contends the reasonable and prudent measures and the conservation recommendations contained in the BO and Decision preclude grazing in certain riparian areas; thus, violating the Granger-Thye Act.

Response: The Forest Service has the authority and responsibility under the Granger-Thye Act and the Federal Land Policy and Management Act to issue Annual Operating Plans to individuals with Term Grazing Permits. As specified in the Term Grazing Permit, part 1, Sections 2 and 3 and in Part 2 Section 8(a)(b) and (c) provide Forest Officers with broad discretion to issue annual operating instructions in the form of AOPs to permittees as needed for resource protection.

The District Ranger is affirmed on this issue.

K. The Outcome of the Biological Opinion was Decided Before the Forest Service Completed the Supplemental Biological Assessment and Biological Opinion.

Contention: The Appellant contends the reasonable and prudent measures contained in the BO contemplate similar actions as the Settlement Agreement reached with the Forest Guardians. Thus, the BO and Decision constitute a rubber stamp on an issue which was predecided.

Response: This statement is speculative and calls for conjecture. The settlement agreement and the BO for the Sapillo Allotment are very different in that the BO resulted in more severe restrictions on grazing practices than the Settlement Agreement did.

The District Ranger is affirmed on this issue.

RESPONSE TO APPELLANT'S REPLY TO DISTRICT RANGER CHAVEZ'S RESPONSIVE STATEMENT.

1. The Appellant contends the Forest Service's belated attempt to remedy the 2/19/99 decision by excluding cattle from the Allotment and imposing utilization levels which are tantamount to the removal of all livestock for the last remaining operation in the Wilderness should be reversed. In addition, the Forest Service is implementing procedures which are either unsupported by science, supported by speculative science and are based on a record which is so limited that a decision maker cannot make a reasoned decision.

Response: The Gila National Forest Plan, as amended on June 5, 1996 by Regional Forester Cartwright, established Standards and Guidelines for all National Forest System lands within Region 3, identifying utilization standards pending a site-specific analysis. In addition,

guidelines identified in the R-3 Allotment Analysis Handbook (FSH 2209.21) Section 53.2 was utilized in establishing utilization levels.

The appellant is incorrect in asserting that implementing procedures were unsupported by science, supported by speculative science and based on a record which is limited. Refer to response E-2, E-3, E-4, and E-5.

The District Ranger is affirmed on this issue.

2. The Appellant contends the responsive statement relies solely on the Biological Opinion issued on February 2, 1999. The decision to remove livestock from this Allotment and other Allotments in the area was a direct result of a 1997 settlement agreement between the Forest Service and the Southwest Center for Biological Diversity. The Forest Service made the command decision to exclude cattle from riparian areas before conducting NEPA.

Response: Refer to response under B.

The District Ranger is affirmed on this issue.

3. NEPA requires the Forest Service to consider the cumulative impacts of its decisions and other decisions affecting the human environment. Based on the settlement agreement, the Forest Service agreed to the Southwest Center for Biological Diversity's demands and excluded livestock from large riparian areas on numerous allotments without complying with the procedural guarantees of NEPA to ensure a reasoned decision-making process.

Response: The Appellant is incorrect in assuming "the Forest Service agreed to the Southwest Center for Biological Diversity's demands, and excluded livestock from large riparian areas on numerous allotments without complying with procedural guarantees." The decision rendered in the AOP is temporary in nature. A final decision will be given when NEPA has been conducted and completed. (Refer to Responsive Statement Exhibit 10.0). The decision to control livestock grazing within the identified riparian area was based on the Biological Opinion the Forest Service received from the USFWS (refer to response to A-1, A-3).

The District Ranger is affirmed on this issue.

4. The Forest Service implemented the settlement agreement by changing the Allotment Management Plans (AMP) through issuance of Annual Operating Plans (AOP) to comport with the settlement agreement. NEPA resulted in the Forest Service issuance of the AOP implementing fencing failed to comply with the procedural guarantees of NEPA.

Response: The Appellant is in error in stating, "The Forest Service implemented the settlement agreement by changing the allotment management plans". No changes have been made in the Sapillo Allotment Management Plan. As stated in the April 6, 1999 letter from Acting District Ranger Annette Chavez to the permittee (Responsive Statement Exhibit 10.0), "As previously discussed, the Sapillo Allotment is scheduled for analysis in 1999. Upon completion of this analysis, future management will be determined". NEPA analysis will be required prior to modifying the Sapillo Allotment Management Plan.

No NEPA analysis has been conducted for fence construction on the Sapillo Allotment as no direction was given to construct a fence. The Sapillo Allotment Annual Operating Plan was amended for the 1999 grazing season to exclude livestock from Black Canyon and Apache Creek no later than March of 1999. (Responsive Statement Exhibit 10.0)

The District Ranger is affirmed on this issue.

5. The Forest Service's decision to comport with the settlement agreement does not comply with the Regulatory Flexibility Act (RFA) 5 USC § 605 et seq. The Forest Service, through implementation of the settlement agreement without affording the proper procedures and scientific data, is clearly impacting small entities and business in the affected area. Failure to address these impacts results in a failure to comply with the duties outlined in the RFA.

Response: The Appellant is incorrect in this assertion. The Regulatory Flexibility Act does not apply to issuance of an allotment annual operating plan. The Act refers to new policy and regulations affecting small business.

DECISION

After a detailed review of the records, I find the District Ranger conducted a proper process that resulted in decisions that are consistent with Forest Service policy, regulations and laws.

The District Ranger is affirmed with respect to all appellant's contentions.

Pursuant to 36 CFR 251.87(c), my decision is appealable to Regional Forester Eleanor S. Towns. A notice of appeal for a second level review must be submitted to Regional Forester, Federal Building, 517 Gold Avenue S.W., Albuquerque, New Mexico 87102 within 15 days of this decision.

Sincerely,

/s/Abel M. Camarena
ABEL M. CAMARENA
Reviewing Officer

cc:
Wilderness District Ranger
Hall Family Trust
Regional Office