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First name: Michele

Last name: Anderson

Organization: Heber Wild Horses Freedom Preservation Alliance

Title:

Comments: I am hereby submitting this information and attachment for the Administrative Record.

The April 2021 SOPA specifies the purpose of the HWHT management plan is "-Regulations, Directives, Orders, -Grazing management". The last Environmental Assessment on the Black Canyon Allotment was in 1998. Since a large part of the HWHT is on the Black Canyon Allotment a current National Environmental Policy Act (NEPA) environmental assessment (EA) should be completed to address livestock management prior to the development of the HWHT management plan. The EA on the Black Canyon Allotment should be included in an EIS for the HWHT management plan. See attachment

Heber Allotment Draft Environmental Assessment

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Regarding grazing, the following allotments are active, also included is the year of the decision notice (DN) for the last NEPA completed for the allotment: Black Canyon Allotment (DN 1998),

[https://www.fs.usda.gov/nfs/11558/www/nepa/97734\\_FSPLT3\\_2465346.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/97734_FSPLT3_2465346.pdf)

Prelude to Catastrophe

Recent and Historic Land Management Within the Rodeo-Chediski Fire Area

Report prepared by:

Center for Biological Diversity

Sierra Club

Southwest Forest Alliance

Appendix B: Livestock grazing allotments in the Rodeo-Chediski fire area.

Black Canyon. 17, 317 acres. An Environmental Assessment (EA)6 in 1998 reported "overstocking and overutilization of vegetation" by cows. Range was in "poor and very poor" condition due to "[h]igh tree densities, overuse of desirable forage". The EA identified a need to "provide residual herbaceous material that both inhibits tree seedling establishment and that carries periodic fire which can thin and remove increased density of trees," and recommends cutting from 213 head down to 60.

HEBER WILD HORSE TERRITORY COLLABORATIVE WORKING GROUP

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Due to criteria that may be identified in the HWHT NEPA and the application of various adaptive management decision criteria, current grazing permits may need to be adjusted. Therefore, it is further 13 recommended that during the same time-frame of the HWHT NEPA, an additional Environmental Analysis (EA) be conducted leading to an updated NEPA for both the Black Canyon and Heber grazing allotments.

Attachment: Image of portion of SOPA