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Title:

Comments: I am hereby submitting the following information for the Administrative Record.

The Sitgreaves National Forest has a lot of issues that have been brewing for years and have yet to be dealt with by the Forest Service. These issues are virtually ignored while all focus is on the elimination of wild horses which are under protection by an Act of Congress. The management plan and EA have failed to prove that the horses are deleterious to the forest while the real issues are not being addressed or managed.

I support NO ACTION as the proper alternative.

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

Excerpts:

The record unambiguously demonstrates that the Sitgreaves national forest is one of the most heavily logged, grazed and roaded forests in the Southwest Region of the U.S. Forest Service (Arizona and New Mexico). It has less old growth, fewer roadless areas, and fewer wilderness areas than the other eleven forests. Virtually every acre within the Rodeo-Chediski fire area was intensively logged, grazed, and roaded. In the past 13 years alone, the Forest Service conducted ten timber sales within its portion of the fire area. Forest Service employees and the Arizona Game and Fish Department repeatedly warned that the logging levels on the Apache-Sitgreaves were unsustainable and Game and Fish even appealed the Forest Plan. Numerous Forest Service studies in the 1990's warned that overgrazing by livestock within the fire area was causing dangerous fuel loads by allowing large numbers of small pine trees to take root.

Several of the allotments, including the largest allotment of Heber have yet to complete environmental review, a review that is likely to recommend reductions in livestock numbers and thinning of pine thickets. The Forest Service's own assessments suggest that reductions or removals of livestock are clearly urgently needed to stop the forests being returned to their hyperflammable conditions after thinning and prescribed burn projects are done.

[https://www.biologicaldiversity.org/publications/papers/r-c\\_report.pdf](https://www.biologicaldiversity.org/publications/papers/r-c_report.pdf)

"Probably no single land use has had greater effect on the vegetation of southeastern Arizona or has led to more changes in the landscape than livestock grazing range management programs. Undoubtedly, grazing since the 1870s has led to soil erosion, destruction of those plants most palatable to livestock, changes in regional fire ecology, the spread of both native and alien plants, and changes in the age structure of evergreen woodlands and riparian forests."

Bahre, C. J. 1991. A Legacy of Change: Historic

Human Impact on Vegetation of the Arizona

Borderlands. University of Arizona Press.