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Comments: For the Administrative Record, I hereby submit the following:

From the 2015 Heber Allotment EA pg 41:

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),

#### Prelude to Catastrophe

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."

From the Collaborative Working Group:

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

This begs the question of why an Environmental Analysis done that includes the Black Canyon Allotment? It looks like one is long overdue and was even the recommended course of action given the circumstances.