Data Submitted (UTC 11): 10/1/2025 11:43:12 PM
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Comments: Objection Comment in relation to Comment submitted 3/06/2020
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Submitted online at? ?US Forest Service NEPA Project Public Reading Room

Subject: Formal Objection to the Heber Wild Horse Territory Management Plan and Environmental Assessment (EA)

As a long-term resident of Navajo County (22 years), I am submitting this formal objection to the proposed Heber Wild Horse Territory Management Plan and associated Environmental Assessment (EA). My objection is based on a combination of direct personal experience, extensive time spent on the land, and serious concerns about the adequacy of the analysis regarding ecological impact, land use, and enforcement.

1. Inadequate Consideration of Motorized Vehicle Impact
Having personally ridden hundreds of miles on horseback across the Black Mesa Ranger District and spent many years as an active archery hunter, I have witnessed firsthand the increase in unauthorized and damaging use of off-road vehicles. Many old logging roads, which had previously been bermed and closed to protect sensitive areas, are now being heavily used again with apparent disregard for wildlife and natural resources.

This increasing access has led to excessive hunting pressure and disturbance to wildlife habitat. The Forest Service and Arizona Game & Fish Department (AZGFD) appear to lack effective enforcement, and the EA does not sufficiently assess or address the impacts of off-road vehicle use on erosion, watersheds, wildlife behavior, and habitat fragmentation.

2. Misrepresentation of Resource Competition
The EA and Forest Service statements suggesting that wild horses "guard water sources" and "compete with wildlife for forage" are misleading. In my observation, the primary competition for forage and water comes from cattle, not wild horses or native wildlife. If there is insufficient forage to support all species, then domestic livestock grazing should be reevaluated and reduced accordingly.

The Forest Service must take a critical look at the current AUMs (Animal Unit Months) allocated to cattle grazing in this area. A scientifically valid, comprehensive environmental study must be conducted to determine the true contributors to range degradation. This study must include not only the seasonal (4-6 month) impact of cattle but also the year-round presence of motorized vehicles and their impact on the ecosystem.

3. Failure to Consider Access Issues for Wildlife and Wild Horses
During the 2018 drought, I personally coordinated water hauling efforts that sustained not only wild horses, but elk and other native species. Some bands of wild horses were unable to access water due to cattle allotment fencing and inconsistent gate management. I recommend that any gate intended to be kept closed should be

clearly marked. Previously, the Forest Service had metal signs stating "Please Close the Gate"-these are no longer present and should be reinstated for clarity and compliance.

4. Lack of Enforcement and Public Education
Enforcement of existing regulations remains insufficient. I reported illegal camping at a water source, only to be told by Forest Service law enforcement that there were no applicable regulations. As a hunter, I was well aware that camping too close to a water source is prohibited to protect wildlife access. While signs were posted at water sources two weeks later, the response was delayed, and the campers had already left behind environmental damage, including smoldering fires and human waste.

The Forest Service must strengthen its enforcement presence, particularly around sensitive resources such as water sources, and educate the public more effectively regarding rules for camping, OHV use, and wildlife protection.

5. Conclusion and Requested Actions
I respectfully object to the current Heber Wild Horse Territory Management Plan and EA due to its:

Incomplete and inaccurate analysis of ecological impacts;

Failure to identify and mitigate the primary sources of range degradation;

Inadequate enforcement and lack of regulatory clarity;

Overemphasis on wild horses as a problem species without sufficient scientific support.

Requested Actions:

Conduct a thorough, peer-reviewed environmental study assessing the comparative impacts of wild horses, cattle, and motorized vehicle use on rangeland health and water resources.

Reevaluate and, if necessary, reduce livestock grazing AUMs based on actual carrying capacity and ecological data.

Improve signage, public education, and law enforcement presence regarding forest use regulations.

Ensure equitable access to water for all wildlife during times of drought, and prevent fencing or gate management practices that limit access for wild horses and native species.

My personal experience, photos, and documentation from the 2018 water hauling effort are available to support these points. I urge the Forest Service to revise the management plan in a way that reflects the ecological reality on the ground and ensures fair, science-based stewardship of the Heber Wild Horse Territory.

Respectfully submitted