

16 July 2021
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McNeal, Arizona 85617

Bureau of Land Management
Safford Field Office
Attention: Scott Cooke
711 S. 14th Avenue
Safford, Arizona 85546
blm_az_sfoweb@blm.gov

Sent via email this date

RE: Safford Field Office Ecosystem and Wilderness Management Plan Amendments (RMPA)

Dear Mr. Cooke,

I am writing to urge you to drop the proposed RMPA as well as the EA they propose to supplement. They are inadequate to the job at hand and if implemented would violate both the letter and spirit of the Wilderness Act. They would not only allow inappropriate use of chemical herbicides and mechanical equipment and undue use of fire in Wilderness areas, but would do so not to benefit the natural resources of the planning area but principally to benefit the ranching industry.

Rather than looking *in toto* at the old planning documents the RMPA references (the RMP, for instance, is thirty years old) and amending (or rewriting) them in accordance with current ecological science and more appropriate economic goals, the Agency merely uses the RMPA to cherry-pick portions of the outdated plans and processes it hopes will allow expanded use of herbicides, mechanical equipment and prescribed burns.

The potential adverse effects of the proposed actions are greater than what can be adequately addressed by brief amendments; rather, the Agency should undertake a full EIS to analyze the conditions these proposals are meant to address, and the potential effects of these proposed actions (especially on Wilderness and other protected lands) - as well as of other alternatives, including the obvious-by-its-absence alternative, namely, the removal or drastic reduction in numbers of livestock in the planning areas.

In this regard, the RMPA repeatedly note that "[i]n recent history natural fires have not occurred frequently enough (due to suppression activities, environmental ecological alterations, or other factors) to effectively change the scale at which invasive species proliferate" in the planning area. The RMPA should be more specific about what these "other factors" are, and in particular analyze how livestock grazing may be a contributing factor.

Rather than analyze the effects of livestock grazing, the RMPA seem to assume some ideal range

of grass-shrub ratios, and some best sort of "native plant stability" (contra "invasive" plant abundance) but does not state what these are, nor the criteria underlying the assumptions. Apparently, such ideal conditions in the Agency's view are those that favor livestock production; and indeed, desirability of livestock production stands out as the unstated, and unquestioned, assumption throughout these proposals.

The desire and intent to manipulate native vegetation and natural landscapes in order to continue and where possible increase livestock production is, in fact, the motivating subtext of the RMPA and their parent documents. But that assumption is precisely one that should be interrogated by the Agency, especially in regard to the issues of fire suppression vs fire prescription, and natural succession vs vegetation manipulation, on all the public lands concerned.

To look at the management conditions objectively (i.e., in compliance with FLPMA and NEPA), the RMPA and associated EA should examine the potential role of livestock in creating the conditions (viz, invasive species proliferation) presumed to call for prescribed fire. Among other aspects of the issue, the Agency should analyze the potential benefits of removing or drastically reducing numbers of livestock for improving fire conditions. It should certainly not be assumed, as the RMPA seem to do, that the most natural or desirable vegetation mix is that which benefits livestock production.

Furthermore, in looking into the relation between livestock grazing and fire conditions, the Agency should engage in a much more rigorous analysis than it has of the role climate change is playing and is likely to play in the development of vegetation mixes with and without pressures of livestock grazing. Native plant stability and other markers of rangeland health must change in relation to rapidly changing climate conditions, regardless of livestock preferences.

Criteria and definitions need to be developed for what in a warmer world is to be considered optimum brush-grass and overstory-understory, as well as livestock-vegetation, ratios. Without such criteria and definitions in place, the proposed amendments amount to no more than a mockery of legitimate NEPA process.

The RMPA also do not consider a sufficient range of alternatives for salt cedar management. Rather than using herbicides in Wilderness, the Agency should look at the problem from a broader, less doctrinaire perspective and consider less disruptive alternatives.

For instance, in this time of high unemployment and shaky economic and increasingly severe climate conditions, rather than resorting to herbicides or other inappropriate chemical poisons for salt cedar treatment in Aravaipa and other areas, the Agency should examine such "People not Poisons" options as development and deployment of a CCC-type taskforce or seasonal teams like the federal firefighter teams being employed elsewhere in response to climate crisis wildland fires.

When broader social benefits and potential long-term environmental risks are figured in, the calculations may well show that such a labor-intensive program makes better economic sense than chemical alternatives justified on the simplistic model of labor/material costs.

Thank you for your consideration.

Sincerely,

Michael Gregory