



WILDERNESS WATCH

Keeping Wilderness Wild

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Acting Supervisor Ericka Luna
Tonto National Forest Supervisor's Office
U.S. Forest Service
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Sent Via Email and U.S. Mail

Re: Concerns and Request for Documentation – Grazing Authorization and Potential Motorized Use in the Reavis-Tortilla Allotment, Superstition Wilderness

Dear Supervisor Luna:

Wilderness Watch and Western Watersheds Project write to express serious concerns and request information about the recent reintroduction of cattle to the Reavis-Tortilla allotment within the Superstition Wilderness. We are particularly concerned about the lack of publicly available environmental documentation supporting this action, and about any authorization or contemplated use of helicopters or other motorized equipment in this designated Wilderness.

We understand that the Forest Service has recently authorized the return of cattle to the Reavis-Tortilla allotment. Please clarify:

- When were cattle first reintroduced to the allotment?
- What class of livestock has been authorized—cow/calf pairs or yearlings?
- What is the current authorized stocking rate and season of use?
- When was the most recent allotment assessment conducted, and has it been made public?

The decision to resume grazing on allotments that have been vacant for several decades constitutes a major federal action under the National Environmental Policy Act (NEPA). NEPA mandates that federal agencies analyze the potential environmental impacts of significant federal actions, which includes the authorization or re-authorization of grazing on public lands, particularly within sensitive Wilderness. Here, the reauthorization of grazing after long-term

nonuse—especially within designated Wilderness—triggers the requirement for a current, site-specific NEPA analysis.

Any new NEPA analysis should account for the ecological recovery that likely occurred during the period of nonuse, including improvements to soil stability, riparian function, and wildlife habitat. A current environmental baseline is critical to evaluating whether resumed grazing is appropriate, and if so, under what conditions. The Forest Service Manual (FSM 2000) anticipates the need for site-specific review in such situations.

We are also concerned by reports that the Forest Service may be authorizing helicopter use or other motorized equipment to manage cattle within the Superstition Wilderness. Section 4(c) of the Wilderness Act prohibits motor vehicles, motorized equipment, and aircraft landings in designated Wilderness. Although grazing is permitted under Section 4(d)(4) as a special provision, associated management activities—such as motorized use—are not exempt from Section 4(c) and must independently comply with its prohibitions. These activities cannot be justified merely for the convenience or economic benefit of a permittee.

The Congressional Grazing Guidelines (H.R. Rep. No. 96-617 (1979)), which accompanied the Colorado Wilderness Act, clarify the scope of permitted grazing activities in Wilderness, including minimum and carefully scrutinized motorized use. The Guidelines do not grant blanket approval for new or expanded motorized uses, and they do not authorize helicopters.

We understand that the Forest Service may be relying on a 1985 Decision Notice / Finding of No Significant Impact (DN-FONSI) to support the current grazing authorization. Please provide a complete copy of that document, including any referenced appendices or attachments—specifically Exhibit A, the range allotment analysis. Additionally, if the agency is relying on or supplementing that record with an Environmental Assessment (EA) or Environmental Impact Statement (EIS) from 1996 or thereabouts, we request a full copy of this document as well, including the alternatives considered and any associated impact analyses. If the Forest Service is relying on a Superstition Wilderness Implementation Plan to guide management decisions in the Reavis-Tortilla allotments, please provide any versions of that plan in your possession.

Accordingly, Wilderness Watch and Western Watersheds Project respectfully request the following:

1. Copies of any NEPA analyses, Decision Notices, Categorical Exclusions, or other documents prepared in support of or relied upon to justify the decision to resume grazing on the Reavis-Tortilla allotment;
2. Documentation or communications describing habitat conditions, baseline assessments, or range inspections used to inform the current grazing authorization;


3. A copy of the current Term Grazing Permit(s), most recent Annual Operating Instructions (AOIs), and any associated Forest Service correspondence with the permittee(s);
4. Notification of any actual or planned use of helicopters or other motorized equipment for livestock management in the Superstition Wilderness;
5. Clarification of whether any public comment process or public notice has been or will be conducted in relation to either the grazing reauthorization or associated motorized use.

The ecological integrity of the Superstition Wilderness is paramount. Reintroducing cattle into long-ungrazed areas may result in substantial and well-documented impacts to soil structure, water quality, riparian function, native plant communities, and wildlife populations that depend on intact arid and semi-arid ecosystems. Peer-reviewed research underscores these risks. See, e.g., Fleischner, T.L., *Ecological Costs of Livestock Grazing in Western North America*, 8 *Conservation Biology* 629, 629–44 (1994); Belsky, A.J., Matzke, A., & Uselman, S., *Survey of Livestock Influences on Stream and Riparian Ecosystems in the Western United States*, 54 *J. Soil & Water Conservation* 419, 419–31 (1999). These impacts must be rigorously analyzed and publicly vetted before grazing is reintroduced or modified on public lands within designated Wilderness.

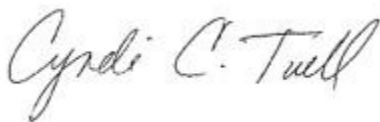
If you believe that no NEPA review or public process is required for these actions, please explain the legal and factual basis for that conclusion.

We appreciate your prompt attention to this matter and look forward to your response.

Sincerely,



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