March 12, 2020

Department of Agriculture

United States Forest Service

Apache-Sitgreaves National Forest

PO Box 640

Springerville, Arizona 85938

Attn: Heber wild Horse Territory

Attn: Anthony Madrid, Forest Supervisor

Attn: Kacy Ellsworth, Public Affairs Officer

Re: Heber Wild Horse Territory Plan #18916 Scoping Public Comment Letter

:

**The Public Lands have been a very important part of life in our family. Most of our free time was spent there when our children were growing up. That is where they learned to respect and value nature and wildlife.  I feel that it is a civic responsibility to pay attention to and enter into decisions that impact this irreplaceable treasure that belongs to all of us.**

**Please include my comments in the public record.**

**The goal of the Heber Wild Horse Territory Management Plan, by law, must be to preserve the herd for future generations. These wild horses come under the jurisdiction of the Wild Free-Roaming Horse and Burro ACT (WFHBA) which was unanimously passed by congress. The lawstates: “It is the policy of Congress that wild free-roaming horses and burros shall be protectedfrom capture, branding, harassment, or death; and to accomplish this they are to be consideredin the area where presently found [in 1971 when the law went into effect], as an integral part of the natural system of the public lands.”**

The federal government does not own lands or the wild horses and burros in the West. These

are not “state lands” and not “federal lands” and not even “government lands”.” They are public

lands. The American people own the public lands in the West and they are administered on our

behalf by the national government under laws and regulations. This land and the wild horses

and burros belong to all citizens of the United States, not the federal government.

I require a plan to educate the forest rangers and other personnel about wild horses and the Heber wild horse herd

***HON. RAÚL M. GRIJALVA***OF ARIZONA<https://www.heberwildhorses.com/about.html>

IN THE HOUSE OF REPRESENTATIVESWEDNESDAY, JUNE 6, 2007·                     Mr. GRIJALVA. Madam Speaker, I rise today to honor Arizona 's wild horses living in the Apache-Sitgreaves National Forests.·                     The residents of the State of Arizona deeply value these magnificent wild horses.·                     These beautiful wild horses are truly the ``Living Symbols of the West,'' as described by the Wild Horse and Burro Act passed by Congress in 1971 to protect the wild horses of the United States .·                     The Rim Country wild horses date back to mounts brought by Father Eusebio Kino, who began his 1653 mission to eastern Arizona by setting out from the lands of my constituency in southern Arizona and traveling across our State northeast to the ``borders of the lands of the Apacheria which border on New Mexico.''·                     These original Spanish horses are the great ancestors of the Mogollon Rim country wild horses. They were the mighty Andalusian war horse, whose origins go back more than 28,000 years to the original Iberian horse; the magnificent Spanish Barb; and the graceful and fluid Spanish Jennet, the mount of many of the great kings of Europe; and the strong bloodlines of these original horses appear almost unchanged in our Rim wild horses 400 years later.·                     Our Arizona Rim wild horses are the direct descendents of the Spanish horses prized by the conquistadors so highly that the foals were carried in hammocks to protect their legs until they were old enough to travel on the forced marches; and prized by the early cattlemen for their endurance and heart and were the very mounts of the U.S. Cavalry as they rode to protect and expand the American west.·                     The Arizona Rim Country wild horses living in Apache-Sitgreaves National Forests are a most precious natural resource to be preserved for our children and grandchildren who will be able to see them for generations to come.

*For hundreds of years, since before the United States declared its independence from Great Britain, wild horses have roamed the Mogollon Rim Country in Arizona.  Evidence indicates ancestors of today's Heber Wild Horses were of Spanish stock brought by the Coronado Expedition in 1540 and then again by Father Eusebio Kino in 1653.*

Because the Heber Wild Horse Territory has never previously had an official plan as is required

by law, but is now in the process of putting together this plan,

 I require all past and current documentation, including but not limited to official surveys, notes, maps, photos, and scientifically supportable reasoning, for the proposed boundary of the Heber Wild Horse Territory as shown in the USFS EA scoping proposal map.

 This required data must include at least

 (a) who (name and/or title),

(b) when,

(c) where and

(d) why these particular acres are proposed as the official territory. The scoping document does state “When the territory was established in 1974, a letter from the forest supervisor to the regional forester indicated the territorial use of the area” however a copy of that letter nor any other form of documentation is provided to the public. I require that a copy of that letter and any other scientifically substantiated proof be provided to the public in the upcoming EA. The USFS just stating this mapped area is the official territory without complete scientific substantial proof is NOT legal. Forest Service raw data and actual official territory survey data done at the time of the ACT (1971) or at least at the time of the notation of the territory (1974) are the only legal and reliable data that can be acceptable

The agency must review the proposed territory boundaries to verify the historic range of the wild

horses of the Apache-Sitgreaves National Forest at the time the law was passed in 1971.

America’s wild horses and burros as they existed in 1971 when the congressionally designated

WFHBA was enacted. The boundaries of the territory must be examined carefully to ensure that

wild horse and burro seasonal migratory patterns as well as the habitat needs of self-sustaining

populations are provided.

The Heber wild horse territory is said to count on 19,700 acres in the Black Canyon area

southwest of Heber, Arizona and to have been established in 1974, three years after the 1971

passage of the Wild Free-Roaming Horses &amp; Burros Act (WFHBA). The criteria for establishing the territory is the presence of any unclaimed, unbranded wild horses and burros at the passage of the WFHBA. Any interpretation of this law must take this to mean the wild horses’ and burros’ *year-round habitat*, not just where they were at the moment of the act’s passage in Congress.

I **require** the upcoming EA provide any and all documentation that substantiates the claim that there was *not* a greater than 19,700 acres of wild-horse-occupied habitat

I **require** data that supports the decision to have designated only that particular area of the forest as the Heber Wild Horse Territory. Wild horse and burro Territories and HMAs were to be designated according to where there were wild horses and burros in 1971. A Territory was not to be drawn and then a population count conducted afterwards for only that area. Historical accounts show wild horses had been roaming through the forest well before cattle allotment and pasture fences had been installed in the 1930s, which at that point cut wild horses off from completely free roaming. Where is any data that shows the only area where there were wild horses in the Sitgreaves was in what they designated as the HWHT in 1973-74? The USFS maintains that there were‭ ‬only seven‭ ‬wild free-roaming horses on the Territory when the Act was set forth and no horses between‭ ‬1992‭ ‬and‭ ‬2004. However in federal court they were unable to substantiate those numbers and those numbers were deemed moot.

I **require** the EA explain in detail the census numbers and methods of gathering the census

documentation (titles of persons gathering data and dates and where horses were located and

other data such as photos) over the past 49 years (since 1971).

In addition, I require the EA include an explanation of the scoping document that states that a

census was completed in 1974 and only found seven wild horses on the forest lands. I require

the EA provide a copy and detailed explanation of the following FS document where it clearly

states that (“White Mt Apache Horses”) wild horses were captured and sold at public auction.

This explanation must include the proof that the horses captured originated from the nearby

reservation as is stated in this document. Who made that decision and what proof was provided

that the captured and sold horses were actually from the reservation?

**The Wild Free-Roaming Horses and Burros Act of 1971**

This is a Wild Horse Territory and as such the horses should be treated as the PRIMARY species in the herd area

Wild horses and burros’ free-roaming status has been seriously compromised by the

construction of fences and gates crisscrossing public lands often at taxpayer expense. These

fences create pastures for rancher convenience, but also effectively impede the movement of

wild horses and burros, thereby preventing them from accessing habitat to which they are

entitled and which contain resources required for their very survival.

I **require** the FS to take a good hard look at all the internal cattle pasture fences and how the fences affect the ability of the horses to migrate for forage and water and to intermingle with each other. The internal fences give principle use to livestock when wild horses are to have principle use. Enlarging some gates and leaving them open at certain times does **not** allow for the free roaming of wild horses. The drought of 2018 is a perfect example of what can go wrong due to the fences having prevented bands of wild horses from accessing water

**POPULATION**

The FS states “Unmanaged horses increase in population rapidly".

I **require** the Forest Service to provide scientific data that validates the claim that there is an overpopulation of horses in the Heber herd.

I **require** the EA explain in detail the census numbers and methods of gathering the census

documentation (titles of persons gathering data and dates and where horses were located and

other data such as photos) over the past 49 years (since 1971).

In addition, I **require** the EA include an explanation of the scoping document that states that a

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This explanation must include the proof that the horses captured originated from the nearby

reservation as is stated in this document. Who made that decision and what proof was provided

that the captured and sold horses were actually from the reservation?

Any and all PZP darting records for the past ten years including darted mares that

subsequently had a live birth foal and all darted mares that have died including basic statistics

on those (age at death and reason for death) and all proposed PZP (or any other method of

herd population control – including sterilization and castration) plans for the next ten-year plan.

An updated and scientifically supported and defensible census of all on the range wild

equine that includes all horses born and died in the past ten years and estimated age at death

and cause of death. This **must include** the recent (last two years) killed horses found in and

around the A-S National Forest.

An updated and scientifically supported and defensible census of all off the range

(previously removed) Heber wild equine that includes all horses born and died in captivity

since the recent ten years of capture/removals and age at death and cause of death.

 Any and all possible alternatives to any removals or contraceptives or any form of population

control (including temporary or permanent sterilization and castration).

**APPROPRIATE MANAGEMENT LEVEL**

Establishment of an appropriate management level (AML) will be proposed in the EA by

formulating the range of numbers of animals that will result in a thriving natural ecological

balance and avoid deterioration of the range. The higher and lower limit of the appropriate

management level for horses within the Heber Wild Horse Territory must be based on an in-

depth analysis of population inventory, resource monitoring, and other available data. A range of

types of monitoring will enable us to know which tool to utilize to help manage population

growth, change patterns of horse use, and to maintain horse health and habitat. I require the

proposed AML (range) be included in i the forthcoming EA but also the data used and the

method used in deducing this AML.

The Heber wild horses are by law all of the wild horses that wander or migrate from the National Forest including their progeny that have used lands of the National Forest on or after December 15TH 1971 or do hereafter use these lands as all or part of their habitat. Therefore, the correct

estimate of the Heber wild horses as of 2017 is within the range of 270 to 420. That range, then

is the only scientific data that can be used to determine the required appropriate management

level (AML).

Although domestic livestock are permitted to graze the public lands portions of the Heber wild horse herd area they are **only permitted** and not designated as are the wild horses. Wild horses and burros are **legally DESIGNATED** on the Herd Management Area (HMA) and livestock are only PERMITTED.

I require the upcoming EA consider alternatives that would mitigate any need to remove any of

the wild horses both temporarily or permanently and must provide the following specific data

and a complete analysis of accommodation of the present wild horse without removals;

pursuant to CFR 43 C.F.R. 4710.5(a).

**RESOURCES AND FORAGE**

I require hard data that shows water and forage consumption of every grazing species in the forest both domestic and wild.

I **require** all info and data on grazing allotments and grazing periods for each and number of livestock cow/calf pairs, if they are imported from other states and if so, what states, for that period and a map of the allotments including name(s) or company names of allotment holders.

I **require** the upcoming EA examine and include analysis of rangeland expansion/improvements

to ensure adequate forage and water resources available for a viable wild horse herd. “Proper

management plans “require a strong information base,” including data on the

“(a) biological potential for the area;

(b) numbers and combinations of herbivorous animals that can be safety carried on the area;

(c) kinds and amounts of forage and habitat required by the animals;

(d) effects of each herbivore species on vegetation and each other;

(e) effects on soil and hydrology; and

(f) an understanding of the economic and social values associated with the area.” (NAS 1982)

In addition, the forthcoming EA must include:

All historical, current and future ten-year range monitoring and plans and scientific

methods used for this monitoring.

**A no action alternative** – with detailed scientific review of this alternative – both pro and con.

 A discussion and a detailed map regarding all fencing, gates and cattle guards within and

bordering the Heber wild horse lands (Apache-Sitgreaves National Forest) and reason for

fencing.

 A scientific discussion regarding how fencing, gates and cattle guards and gates influence

the wild horses from accessing any water sources and/or forage resources and how it

effects wild equine genetic variability on the Apache-Sitgreaves national forest.

The EA proposal must include a section discussing those alternatives that were considered

but rejected with a detailed explanation of the reasons for their elimination and not just

respond “outside the scope”. Nothing is “outside the scope” if it affects the wild equine and

their resources that are congressionally designated on these lands and the NEPA law

requires that all relevant scientific information be provided to the American public and that

that information be taken a “hard look” at by the decision makers.

**STERILIZATIONS/SEX RATIO SKEWING**

I am strongly opposed to the administration of PZP, GonaCon and other sterilizations such as

ovariectomies and stallion castrations The weight of scientific evidence and public opinion clearly do NOT support decisions to conduct any of these sterilization procedures.

The Senate voted AGAINST *sterilization,* euthanasia and unrestricted sales of Federally Protected Wild Horses & Burro.

Neither should the unnatural skewing of sex ratios be implemented. All of these disrupt normal wild horse behavior, thwart their ability to survive in the long term, affect their social integrity, causing stress & dissension among wild horses, between stallions & also between mares & stallions & even between mares, as has been observed in the field. All these unnatural manipulations are cruel & contrary to the true intent of the WFH

Please know that that the American citizens realize that the USFS scoping proposal makes it

clear that the forthcoming EA proposed capture/removal/sterilization of wild horses is nothing

more than a strategic and deadly action in the ongoing management of the American people’s

wild horse for EXTINCTION. The evidence makes it clear that the USFS is engaged in a

concerted effort to manage the Heber wild horses and burros to extinction.

**Managing for Extinction**

*Recent scientific evidence suggests that most of America’s wild horse and burro herds are not genetically viable, and the eventual extinction of most wild horse and burro populations is likely. The BLM’s plan to reduce the wild horse and burro population to just over 28,000 animals only compounds this problem. The question then arises: can we save the remaining wild herds before it is too late? In the past decade, tremendous strides have been made in genetics research through DNA analysis. Research conducted on wild horse populations in the American West reveals how precarious the situation is for the vast majority of wild horse and burro populations under the BLM’s management. Dr. Gus Cothran, a professor in the Department of Veterinary Integrative Biosciences of Texas A&M University and a leader in the field of equine population genetics, has been analyzing blood and hair samples from wild horses in the United States, including a long-term study of horses living on the Pryor Mountain Wild Horse Range. He suggests managing wild horses at low population levels leaves the animals vulnerable to inbreeding—the same problem plaguing endangered species around the world. Dr. Cothran’s research indicates that in a closed population (where there is no immigration of horses from adjacent populations), the minimum number of wild horses and burros needed to ensure long-term genetic viability is 150 to 200 animals, of whom it is estimated 50 will contribute their genes to the next generation. Yet, the BLM recklessly dismisses the need to maintain larger,genetically healthy herds by occasionally introducing an unrelated wild horse into a herd to ostensibly compensate for managing the herd at a size that is not genetically viable. This band-aid approach with the alleged purpose of preserving the genetic diversity of wild horse populations not only results in adverse biological impacts and a dilution in herd-specific genetically unique characteristics, but it also violates the BLM’s legal mandate to manage for “selfsustaining” animal populations. Dr. Cothran has worked in collaboration with Dr. John Gross an ecologist with the National Park Service’s Inventory and Monitoring Program. Dr. Gross analyzed five years of research data on the Pryor Mountains and created an individualbased model to simulate the dynamics of wild horse populations controlled by removal and/or immunocontraception. Dr. Gross’ analysis of the Pryor model in his study, “Genetic and Demographic Consequences of Removals and Contraception on Wild Horses in genetic exchange. In some cases, the BLM has introduced horses from other herd areas to try to offset extremely low AMLs. These transfers, however, threaten to dilute the unique characteristics that herds developed over years, if not centuries, of natural selection. Rather than manipulate the genetics with outside introductions, wild horse and burro advocates believe it is more prudent to allow populations to increase to genetically viable levels. This may require rewriting management plans, decreasing the available AUMs for livestock grazing in herd areas, expanding herd area boundaries and/or simply allowing numbers to rise naturally over time within each area in jeopardy. The BLM should be guided by the WFHBA and scientific research. Otherwise, we will lose our precious wild horses and burros forever.*

**Scientific Critique**

*Animals and humans are alike in that both are intelligent, sentient beings, deserving of a life lived in freedom and dignity, free from oppression, in habitat that is natural to each. Animals and humans are also different, just as all species are unique. They differ biologically, anatomically, physiologically, neurologically, and behaviorally, so that attempts to apply the results of experiments on one to the other are scientifically invalid.*

<http://www.chai.org.il/en/compassion/experiment_scientific.htm>

Concerning the administration of PZP, GonaCon & other sterilization drugs as well as any mare ovariectomies & stallion castrations, none of these should be adopted in your HWHT plan! Neither should the unnatural skewing of sex ratios be employed! These disrupt normal wild horse behavior, thwart their ability to survive in the long term, affect their social integrity, causing stress & dissension among wild horses, between stallions & also between mares & stallions & even between mares, as I have observed in the field. All these unnatural manipulations are cruel & contrary to the true intent of the WFHBA.

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**ovariectomies and stallion castrations The weight of scientific evidence and public opinion clearly do NOT support decisions to conduct any of these sterilization procedures.**

**The Senate voted AGAINST *sterilization,* euthanasia and unrestricted sales of Federally Protected Wild Horses & Burro.**

Don Moore, DVM is a respected Veterinarian who has extensive knowledge about wild horses and wild horse behavior. He states, “The three surgical procedures for permanent sterilization of mares described in the mare sterilization research project, ovariectomy via colopotomy, tubal ligation and hysteroscopically-guided laser ablation of the oviduct papilla all require certain pre-operative and post-operative considerations for aseptic surgical protocol and pain management.

Pre-operative bloodwork and a thorough examination are always performed on the relatively few domestic mares which are spayed. Other options other than surgery are always considered first due to the risk involved with any of these procedures. Aseptic surgical protocol and pain management is the standard of care for each and every surgery or the performing veterinarian would undoubtedly be sued by the owner and reprimanded by the state veterinary board.

Wild mares will not have their surgeries performed in a sterile surgical suite. Their surgery will be performed in a non-sterile chute or standing in stocks at the local BLM facility without the benefit of the routine standard of care. Unlike domestic mare who are easily handled, the very handling of these wild mares presents additional pre-operative stressors, which cannot be mitigated.

The Forest Service does **not** possess the statutory authority to perform sterilization surgeries

 On America’s wild free roaming mares..This type of butchery is a violation of the least feasible management clause of the Wild Free Roaming Horses and Burros Act.

Menopause…and Wild Horse Management

*Dr. Bruce Nock*

*Liberated Horsemanship*

*Menopause and Wild Horse Management*

*You might be wondering what this has to do with wild horse management, right?*

*Let me explain. In 2010, the Bureau of Land Management (BLM), raised the possibility*

*of gelding males (removing their testes) and spaying females (removing their ovaries)*

*before returning them to the range.1 Now, they have once again proposed spaying*

*females as a method to control wild horse populations. Technically speaking, horses*

*have estrus cycles, not menstrual cycles.2 Nevertheless, spaying removes the primarysource of estrogens and progestins from the body, just like menopause, and there is no reason to believe the consequences are less severe for mares than they are for woman. In fact, for woman the surgical removal of the ovaries results in more severe symptoms of menopause, because in natural menopause the ovaries continue to produce low levels of female hormones. It is hard to imagine that removal of these hormones from the body by spaying won’t compromise a mare’s ability to survive and thrive in the wild.*

*You see, the ovarian hormones are powerful steroid hormones. They have*

*widespread effects on physiology and behavior. Estrogen, for example, is essential for healthy bone. When estrogen production declines due to menopause, whether naturally*

*occurring or surgically induced, or after exposure to radiation or chemotherapeutic*

*drugs, bones become brittle and break easily. Spaying mares is likely to have similar*

*effects on bones density and strength. I wonder, does the BLM really think returning*

*mares to the open range in a condition associated with the increased risk of breaking*

*bones is a good idea? Have they given it any thought at all? The image of a horse*

*suffering with a broken leg on the open range due to compromised bone density isn’t a*

*pretty one.*

*Ovarian hormones also influence many neural circuits throughout the brain by*

*binding to transcription factors which regulate the activity of certain genes.3 In addition*

*to the hypothalamus and other brain areas related to reproduction, they affect the*

*activity of serotonin pathways, catecholamine neurons, and the basal forebrain*

*cholinergic system. They influence the functioning of the hippocampus, a brain region*

*involved in spatial and declarative memory. Ovarian steroids also have measurable*

*effects on affective state, e.g., mood/emotion, and cognition … the mental processes*

*involved in learning, memory, problem solving and decision making. They affect*

*cardiovascular health and immune function. And, anyone who has watched mares in “heat” might guess, ovarian hormones have potent effects on social relations too … an effect incompatible with the BLM’s goal of creating a “thriving natural ecological*

*balance” for the wild horses (see 4).*

*But, taking out the ovaries doesn’t just remove ovarian hormones from the body.*

*There’s more to it … a lot more. It affects other endocrine systems as well. Even forty*

*years ago endocrinologists appreciated the subtle intricacies of endocrine system*

*function and the complexities of hormone interactions. My endocrinology professor in*

*graduate school, Dr. Alan Leshner PhD, drove home time and again the point that “No*

*hormone works independently of other hormones.” Take away one hormone and it*

*affects the levels of other hormones too. Remove ovarian hormones and pituitary hormone releasing and inhibiting hormone activity changes, gonadotropic hormone*

*levels go up, adrenocorticotrophic hormone levels go up, cortisol levels go up, thyroid*

*hormone levels go down, and so on and so on. It’s a fact. Moreover, the assessment of*

*the long-term consequences of such hormonal imbalances requires in-depth, long-term*

*comprehensive field studies by professional scientists … individuals trained and*

*experienced in the art and science of science. Veterinarians don’t currently know the*

*consequences. BLM personnel don’t currently know the consequences. The National*

*Science Foundation doesn’t currently know the consequences. But, it is reasonable to*

*suggest based on what we do already know that spaying is likely to have serious consequences for a mare’s ability to survive and thrive on the open range.*

*So, the idea of spaying mares as a method of population control doesn’t sit well*

*with me when I think beyond how it impacts reproduction. I’m also skeptical about whether it can be done safely in the field. Taking out the ovaries which reside in the*

*abdominal cavity is a much more serious procedure than removing the testes of a male.*

*When we ovariectomize rats for research, we do it in a state-of-the-art animal facility.*

*We’re required, by federal law, to use sterile procedures and defined recovery and*

*followup protocols. I’m wondering, can and will the BLM, a federal agency, adhere to*

*the practices the federal government requires us to follow for rats when removing the*

*ovaries of horses in the field? I seriously doubt it is possible.*

*Even if such precautions are effectively implemented, I doubt the wisdom of*

*returning spayed horses to the open range when bone health, mental and emotional processes and social behaviors have been compromised. The endocrine system is one of*

*the major signaling systems of the body and ovarian hormones are major components.*

*They are powerful agents which function to coordinate behavior and physiology.*

*Inducing what could be described as physiological chaos by removing ovarian*

*hormones and disrupting the normal functioning of neural and other endocrine systems*

*to boot is very likely, in my opinion, to compromise a mares ability to thrive as a fully*

*integrated herd member.*

 **“Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward”**

*This report reviews the science that underpins the Bureau of Land Management’s oversight of free-ranging horses and burros on federal public lands in the western United States.*

 *Horse and burro management and control strategies cannot be based on biological or cost considerations alone; management should engage interested and affected parties and also be responsive to public attitudes and preferences. Three decades ago, the National Research Council reported that public opinion was the major reason that the Wild Horse and Burro Program existed and* ***public opinion was a primary indicator of management success*** *(NRC, 1982). The same holds true today.*

<http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/wild-horses-report-brief-final.pdf>

“Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward”

National Academy of Science - This report reviews the science that underpins the Bureau of Land Management’s oversight of free-ranging horses and burros on federal public lands in the western United States.

The few remaining Wild Horses and Burros that remain on public lands today are cherished by the American People. They are an integral part of the Western range and a valuable component of a Thriving Ecological Balance. The 1971 congressional Wild Horse and Burro Act states: *“It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death.”*

**U.S. Forest Service**

**Motto: Caring for the Land and Serving People**

The phrase, “Caring for the Land and Serving People,” captures the Forest Service mission. As set forth in law, the mission is to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of people: It includes:

*We follow* ***laws,*** *regulations, executive direction, and congressional intent*.

This is the law:

*Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people; and that these horses and burros are fast disappearing from the American scene. It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands.*

The social impacts on the American public of destroying these Wild Horse Herd populations is overwhelmingly given the strong support the American public has to protect, preserve and view Wild Horses living naturally on protected public lands. The BLM has been given a very great responsibility to manage and protect America’s Public Lands, Wildlife and natural resources. Our Wild Horses and Burros are very much a part of that. Thank you considering my comments and please take this responsibility seriously. Future generations will either blame you or thank you for the decisions and actions that you take.

Thank you for considering my comments

Sherry Oster