

Attn: USFS, Heber Wild Horse Territory
In re: Heber Wild Horse Territory Management Plan
P.O. Box 640
Springerville, AZ 85938

16 March 2020

I submit the following comments in response to the USFS scoping notice for the Heber Wild Horse Territory Management Plan. The Heber wild horses are of great importance to all members of the public who enjoy visiting and reading about these animals. Having the opportunity to visit and read about these wild horses provides the public with great enjoyment of our public lands, and provides the local economy a significant source of revenue. The Apache-Sitgreaves National Forest is of particular cultural and environmental importance to me and to many Americans precisely because the Heber wild horses live in this USFS Wild Horse Territory.

Considering the great importance of the preservation and well-being of the horses of the Heber Wild Horse Territory to so many Americans and indeed to the local economy, the USFS Management Plan must address the following issues:

1. **AML and Forage Allocation:** The Appropriate Management Level (AML) must conform to the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA) and specifically, AML must ensure genetic viability of this herd, by ensuring a minimum population of at least 150 horses, or at least 50 effective breeding animals. The Bureau of Land Management's Wild Horse and Burro Handbook recommends this standard in order to maintain an acceptable level of genetic diversity, and USFS should follow this guidance. AUMs or forage allocation within the Heber Wild Horse Territory must be designated "principally but not necessarily exclusively to wild horses" as outlined in the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA). At minimum, the Heber Herd should be allocated 50% of the forage in their own dedicated Territory.
2. **Natural Behaviors:** The Management Plan must prioritize preserving natural wild horse behaviors to comply with both the 1971 Act, which specifically protects "wild, free-roaming" equines and the natural behaviours they exhibit in that state, and the National Academy of Sciences' 2013 Study which was commissioned by the Bureau of Land Management to help guide that agency in improving its Wild Horse and Burros Program on the public lands under its jurisdiction, and which should be followed by all government agencies which manage public lands on which wild equines are living.

To comply with the 1971 Act and with NAS recommendations, the following actions must be **prohibited** from management actions:

- **sex ratio skewing** which causes dangerous stallion aggression and potentially life-threatening injuries due to the unnatural ratio of males to females;
- **any surgical sterilization** which alters an animal's ability to produce natural hormones and which would then change natural behaviors.

Surgical sterilization is also extremely risky from a veterinary point of view. The NAS has determined that it is “not advisable” for field application due to the extremely high risk of serious complications up to and including fatalities. This is especially true for surgical spaying of wild mares in field conditions, but castration of sexually mature wild stallions in field conditions also carries unacceptable risks of serious complications and fatalities due to increased risk of infection and excessive bleeding. For these reasons, I have long objected to surgical sterilization.

- **any fertility control that alters the production of natural hormones.** Again, fertility control measures, or any management measures, must not interfere with natural wild equine behaviors, as unintended consequences would occur. In any case, wild horses and burros are required by law to be managed in such a way as to preserve their natural behaviors. I note that the use of the reversible, PZP immunocontraceptive vaccine does not alter natural behaviors, is efficacious, cost-effective, safe, and can be easily and safely administered by dart injection. USFS should apply PZP to safely and humanely manage this herd instead of other more invasive, dangerous and costly measures.

3. Management and Fertility Control: Given the unique importance of the Heber wild horses to the public and the local economy, and given and the history of catastrophic fires in the area, the Management Plan must include managing horses outside of the Territory through the application of the immunocontraceptive vaccine PZP as well as relocations, as opposed to removals. The Heber wild horses in and outside of the Territory can be easily controlled and reduced through natural attrition and with the use of PZP. Volunteer organizations are ready and able to work with USFS to implement this humane management method which prevents and excludes removals, and which complies with the provisions of the 1971 WFRHBA requiring that wild equines be managed in their wild state at the minimum feasible level.

4. Fencing: Existing fencing is currently impeding horses from accessing necessary forage and water resources throughout much of the Territory. Any fencing within the Territory that prevents free movement must be removed. Fencing can and must be reconfigured to allow the wild horses within the Territory access to these necessary resources in order to comply with the 1971 Act.

5. Boundaries: Historic information and current geographical data indicate that the Territory boundary is incorrectly drawn and that adjacent lands which have been seasonally used by wild horses for decades were erroneously omitted from the current Territory boundary. The

Management Plan must address seasonal movement of the horses and make a recommendation that the boundary be redrawn to be in conformance with historic wild horse usage and the animals' need to have access to suitable habitat throughout the year. These animals naturally and necessarily engage in patterns of seasonal movement, and the Territory map must reflect this fact, as well as historic data. All source documents regarding historic horse use should be included in the Management Plan appendix.

6. **Census:** Prior to drafting the proposed Management Plan, USFS must conduct a current census to confirm the population number. No action can be taken without this necessary information. Photo mark-recapture methodology should be employed in the next census.

The preservation and protection of America's wild horses and burros remains extremely important to the majority of Americans throughout the nation. This was true in 1972 when the Wild Free-Roaming Horses and Burros Act was unanimously passed by Congress, and it remains true today. The USFS is accountable to the public which it serves in managing not only the lands under its purview, but also all of the species which reside there, including federally protected wild horses and burros. The agency has a duty to the American public to protect all wild equines living on the lands which it manages, and it must act in accordance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Janet Lynch", written in dark ink.

Janet Lynch