

March 16, 2020

To: A/S Black Mesa Ranger District
Re: Proposed Wild Horse Management Plan

After reviewing the subject plan I have the following comments:

1. The extreme emotion directed toward the “wild horse” issue seems to be pushing the Forest Service into another bad situation. Remember the beginning of the Wild Horse Act was also emotion driven and land management has been kicked around ever since. The extreme advocates for wild horses will fight any attempts to apply reasonable management.
2. The original herd protected by the law in 1971 was determined to be 7 head. To increase that to 100 head now seems a great jump unsupported by the law and just caving to pressure.
3. Excess horses were removed from the herd in the 80s and the numbers should be included in your documents.
4. According to your document the original herd was not viable on a long term basis and should be acknowledged as such. To propose a new herd not from the original animals, but mostly from the Apache Reservation seems a legal stretch. I suggest a better explanation be included.
5. Has the Apache Tribe been ask to take their horses back? Include any correspondence regarding this matter in your document. Will the FS be open to future lawsuit for illegally taking Apache livestock?
6. The consideration of this proposal contradicts FS long term efforts to improve livestock grazing practices. Wild horses can't be rotated from pasture to pasture any more that elk and deer populations. My lifelong experience in grazing matters has been horses are hard on the range, they eat twice what a cow does , and trying to manage them under the ample requirements so well documented in your proposal is a can of worms you would be smart to avoid.
7. If a wild horse herd is inevitable, then I suggest you concentrate on including a plan to remove surplus animals without additional NEPA required. Consider getting an agreement with the Apache Tribe to take the designated surplus animals for a set fee per head. I would guess \$500 per head would be a bargain compared what BLM spends to do the same. In fact some actual figures along these lines would be a valuable addition to your analysis process. Tell the public how much it costs to have a wild horse program on the A/S. I have heard BLM spends large sums of money to keep surplus horses on private pasture in the mid-west. It would be helpful to know as options are considered.

Anyway good luck with your project the A/S deserves your best efforts especially in leadership.

Sincerely: Mel Wilhelm