

**USDA FS's ANSWER** to this public comment just above, is just below (and appears to be further unequal protection under the law) if we are not going to put out water for wild horses when needed,

“An economics analysis will be performed as part of the proposed action to determine the costs of the proposed improvements. **A combination of funds including grants and contributions from federal, state, and private entities including the permittee may be used to pay for these improvements** and are obtained nearer to implementation of the improvements.” emphasis added.

**Another Proposal by the USDA FS:**

**INSTALLATION OF CATTLE GAURDS** - Rather than GATEs and LABELS so wild horses can move?! This needs clarification or CAES et al. or we cannot agree.

“Installation of cattleguards will help control livestock use by reducing the problem of gates left open by recreational users and others.” Installation of cattleguards and moving an existing cattleguard are being analyzed under Alternative 2, the proposed action. This will alleviate some of the problems associated with gates being left open by other Forest users.

**This project gets an Environmental Impact Statement but not the Wild Horses after 50 yrs and much false information?! They should BOTH!**

4FRI Rim Country Project Environmental Impact Statement:

The desired condition from implementation of the Rim Country Project is to improve forest health and develop a forest structure that is resilient to natural elements including disease, fire, and insects, and climate change.

Another:

**PINON JUNIPER “TREATMENTS”**

“Areas where pinyon-juniper was reduced or eliminated by the fire should be managed to maintain a grassland aspect on appropriate soils and levels of tree cover compatible with good watershed conditions on those soils Maintenance and thinning within the Pinyon Juniper and grassland areas is proposed along with maintenance burning in the treated areas.

This flies in the face of science.

**OTHER AGENCIES and INDIVIDUALS CONSULTED**

Everyone is included it seems, except, CAES, WHOA, WHOA-Voters and consultant Theresa Barbour or CAES et. al. who specifically requested to be notified of any movement on the management plan development.

Additionally it was mentioned that tribes were consulted however communication was difficult due to covid and the tribes did not respond. This plan has been 50 years in the making there is no acceptable reason not to have input from the tribe, especially the White Mountain Apache who has utilized these horses throughout history.

### **ADAPTIVE MANAGEMENT MEASURES ON HORSES**

While there are measures for monitoring watershed, in this NEPA process etc. **There is little in this plan for the measurement of wild horses though this is a Plan for Wild Horses. The following measure are suggested:**

- Population Management Measures: See NEW MEASURE 1) Below
- Genetics
- Attrition Rate
- Foal Mortality
- Predator Rate
- Counting Method
- Water Monitor
- Removal Rate Versus AML called MM (Feasibility and Humanity)
- Transparency - Hidden Agendas and Propaganda Monitor
- Climate Change - actively monitored for every project with associated cost analysis.

IMPORTANTLY- We NEED A Measure of Removals versus AML

1) **MANAGEMENT MEASURE (MM):** As managers of wildlife we are concerned with not just having a specific number such as AML. We need to have a **SIMPLE MEASURE of our success for feasibility and humanity** which tells all at a glance.

Over a 10 yr period, I recommend the following measure:

$MM = \text{No. of Removals divided by the mid AML range.} \Rightarrow \text{Removals/AML}$

Management Goal would be well under one (1)

This addresses both feasibility & humane issues.

GOAL: MM less than 1.

Once at AML and maintain PZP darting at about 80% mares/yr. per WHOA population modelling. We can easily keep this MM no. at 1 or under.

For example:

NOT Feasible

Removing 1000 wild horses in 10 years with a median AML of 100  
Management Measure or MM = 10

Feasible & Humane

Removing 100 wild horses in 10 years would then be an MM of 1

## 2) COUNTING METHOD IS NEEDED : Alternative Feasible and Transparent Real Time COUNTING Method

The counts of the HEBER Wild Horses are not updated and does not take into account the shootings and removed horses:

Page 36 Excerpt Using Science to Improve the BLM Wild Horse and Burro

Program: A Way Forward (2013)

*(Pre-Gather and Post-Gather Counts.)*

“All the methods except removals or captures can be conducted from the ground or from the air. In ground-based surveys, observers might traverse transects on foot, in vehicles, on horseback, or a combination of the three. **Ground-based observers may be in prepositioned, stationary blinds to count animals with the mark-resight or double-observation methods. Cameras can be used to photograph animals at places of common congregation, such as watering holes (Cao et al., 2012; Petersen et al., 2012), and animals can be identified in a series of photographs over time by their markings; this procedure is typically used in a mark-resight analytical framework.**”

Stacy Sanchez uses this method and has the most accurate and updated count with pictures: He states there are approximately only 420 horses now, though this is the estimated count of the Forest Service for 2017. This has not increased since then if that was a correct count. This makes sense since normal attrition is 10% per the NAS and subtracting the wild horses who were shot is another 10%.

Stacy also states that after the last Helicopter flew over to count Heber wild horses, a foal was found with it's hoof missing..... Counts by helicopter NOT should not be done during peak foaling season.

CHEAP and EASY : Good project for collaboration.

3) WATER v 6th mass Extinction in the U.S. Much is made of public lands ranching sharing water with wildlife. However, given that this water is not sustained year round and there are many “pasture” fences and gates, this annual effective removal of water can then become an annual die off for wildlife including horses.

Water should be ensured in each fenced area year round and gates labelled so that tourists know when gates should be open and when they should be closed.

Fencing should be partially removed as well in certain areas when cattle are off.

4) CLIMATE CHANGE per the land use plan is passively monitored once every 5 years. However, climate change should be actively reduced by monitoring Albedo of the forest, carbon uptake of the forest, carbon output of the manure from cattle/ruminants.

ALL projects regarding forage, watershed etc. should also be measured for it’s impact on these climate change measures of carbon footprint and albedo.

These measures should be utilized in every cost analysis as well.

Moreover water and forage cannot be utilized to manage wild horse population as per the 1971 Act, and also as shown in the National Academy of Sciences Report. This is a well known method and has been utilized illegally by rouge agencies even since the 1971 Act. Alternative 1 gives illegal and improper guidance on water. Alternative 2 is little better.

Wild horses do not cause climate change, however cattle do, and wild horses cannot be penalized for a reduction in snow melt which puts all water into the hands of people rather than wildlife versus perennial streams fed by snow melt.<https://www.blm.gov/policy/im-2015-151>

**TIERING** - meaning moving forward without re-inventing the wheel.

This EA could have tiered with the Carson National Forest which has utilized Peak Facilitization and the writer for approximately 1.5 years to move forward in a Win Win Win fashion. That means Public Lands Ranchers, Horses, Advocates/Environmentalists.

Unfortunately, this EA process has cost the tax payers, the horses, the public lands ranchers providing little more than a non-transparent justification to continue the wipe out of these protected wild horses.

**GATHERS** <https://www.blm.gov/policy/im-2015-151> The BLM’s use of Helicopters for gathering horses is entirely illegal and insufficient with respect to legal and humane treatment of a wild horse.

In addition, the BLM has not even taken the insufficient advice of the two veterinarian teams that gave input. The independent veterinarians stated that cameras/video should be used during round ups. This is not done and none of these vets were even allowed to sit in a helicopter during a round up.

They did fly over Horse Territories not during a round up and noted dead horses on the grounds which seemed to be dead due to lack of water Cattle Gone Water Off issues which have been illegally and inhumanely used to manage wild horses in pastures through time by leaving gates closed when ranchers stop hauling water etc.

While the Secretaries of the Department of Interior and the USDA Forest Service CAN utilize motorized equipment, they CANNOT utilize it inhumanely.

Moreover the Lacey Act also applies and these wild horses cannot be moved inhumanely in any case.

SEE Three affidavits by Dr. Lester Friedlander DVM

#### **FERTILITY CONTROL REQUIREMENTS - Humane and Genetically Responsible.**

- Any fertility control that cannot be done by individual or family band ON THE RANGE is inhumane and unfeasible.
- Any fertility control that permanently sterilizes after less than 5 darts is unacceptable.
- Any fertility control that is surgical is inhumane. This includes any type of spay.
- Any fertility control that requires the equine to be knocked out or put under is inhumane and not feasible.
- Any fertility control uses must have a PUBLIC COST Analysis and PUBLIC NEPA Process.
- Any fertility control that does not wear off within 3 yrs is too dangerous genetically as wild horses can be easily double darted and can easily end up sterilized. Conversely with Zona Stat H, an older mare receiving her 5th dart in as many years may become sterilized

**As long as there are known feasible on range methods that meet these conditions, there is no reason to be experimenting on these sentient beings and their families. Hitler thought that was okay too. It is not. That includes useless collar experiments which are never published and risk the lives of the sentient being. There are game cams drones with IR and Satellite and now Iris recognition.**

**The cattle are over utilizing the natural waters here at Heber.**

**However:**

<https://youtu.be/jbEQWuPiqU8> This grazing allotment at this link leaves the water on year round for the wildlife. Horseshoe Allotment Both BLM and USDA FS.

On page 3 of the **Heber Wild Horse Territory Proposed Appropriate Management Level Determination**

**It is stated that a wild horse needs 9,490 lbs of forage per week. This is incorrect.**

A wild horse weighs approximately 600 - 700 lbs. They need 1 to 2% of their weight per day. At 1.5% that would be 10.5lbs/day and 3832.50 lbs per year.

On page 22 **“While the data are collected to help with livestock management, there is no distinction between cattle, horse, or wildlife use.** Utilization levels for both allotments, 2007 to 2018, are displayed in table 12. The utilization monitoring data indicate the allowable use guidelines have not been exceeded within the territory over the past several years.

On page 23 **“These low utilization levels indicate that the use of the territory, by all grazing animals, over the past ten years has been within the forage-producing capability of the area.”**

On page 26 “Cover and Space” section, in about 1 out of 20 winters, seasonal snow can accumulate to levels of 30 inches or more. In such years, horses would not have access to the forage, thus rendering it unavailable.”

On page 26 bottom “According to the Western Regional Climate Center (2015), in about 1 out of 20 winters, snowfall accumulates to levels of 30 inches or more, which likely would cause **horses to migrate to areas of lower elevation in order to survive.** “



Figure 9. Heber Wild Horse Territory and grazing allotments



Proposed Appropriate Management Level Determination for the Heber Wild Horse Territory

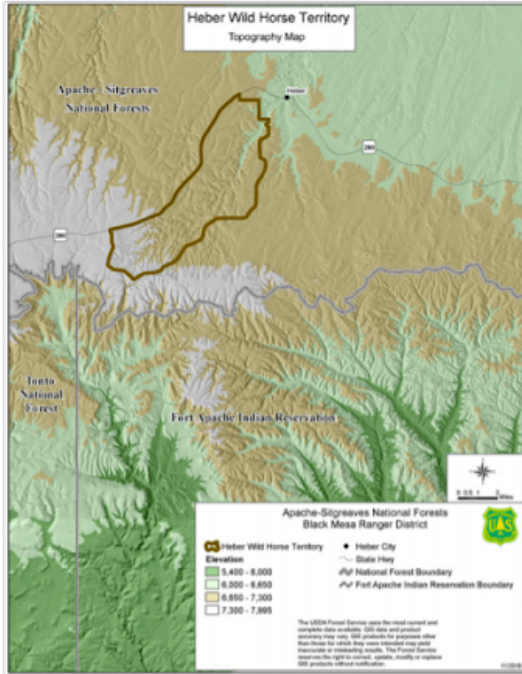


Figure 10. Broad overview of terrain

Did not show water in the other areas where the horses are per the USDA FS own surveys.

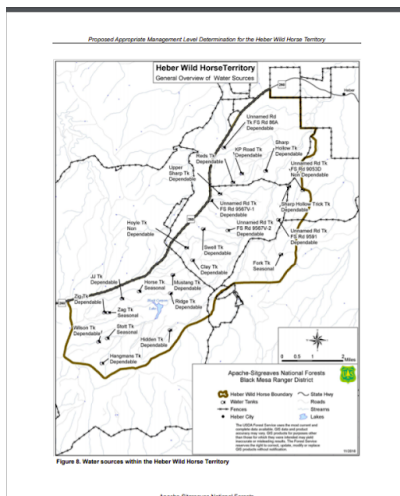
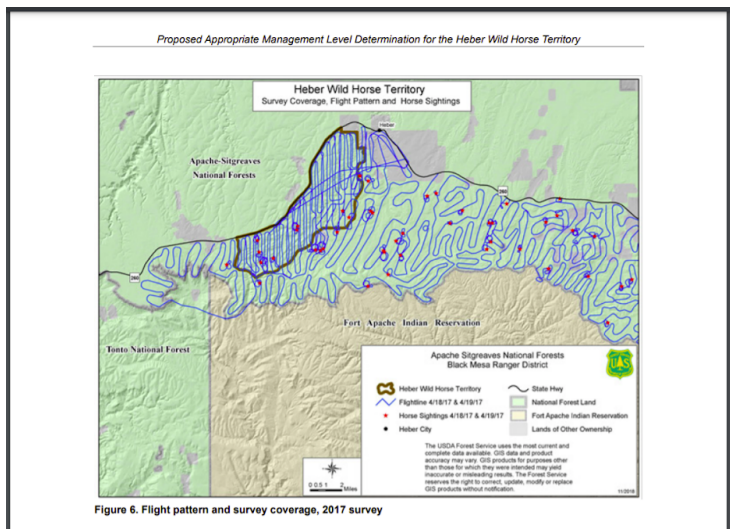


Figure 8. Water sources within the Heber Wild Horse Territory





Page 27

“When the territory was established, **the northern portion was identified as winter range; this is the lowest (6,700 to 7,000 feet) elevation and consequently the warmest part of the territory.** Canopy cover is often used to determine thermal cover for wildlife, but when considering the need of cover for horses, consideration beyond canopy cover must be incorporated. Horses use tall brush to retain heat in the winter and trees to provide shade in the summer; they will also utilize the topography for shelter from wind. Figure 10 shows a broad overview of the terrain of the area. Areas of lower elevation are shaded green while the areas with the highest elevation are whitish. The Western Regional Climate Center (2014) indicates the prevailing winds in the area are generally out of the southeast in the winter and out of the southwest in the summer. As displayed in figure 10, the flatter terrain to the northeast offers lower elevation (and therefore less snow accumulation), while the canyons to the south of the territory offer more shelter from the wind than the area within the territory.”

**CLEARLY, the wild horses also utilize this area between the Rim and the “territory.**

Crane and others (1997) found horses move from lower to higher elevations in the summer and back to lower elevations in the winter where access to feed is less hampered by snow accumulation. Salter and Hodson (1979) found while horses will paw through snow to get to forage, areas which remain snow free or had reduced snow depth throughout the winter were favored and more heavily utilized. Wockner and others (2003) found horses prefer lower elevation and drier habitats during the winter. However, in the summer horses prefer flatter areas with higher elevations, lower canopy cover, and proximity to water. All of these studies corroborate what appears to be happening in this project area. Large ungulates are known to migrate off the Mogollon Rim in the winter to the canyons located to the south, as displayed in figure 13 (Arizona Game and Fish Department 2014, personal communication). The horses in the area may be behaving similarly, but there is a lack of monitoring data to support or dispute this assumption.

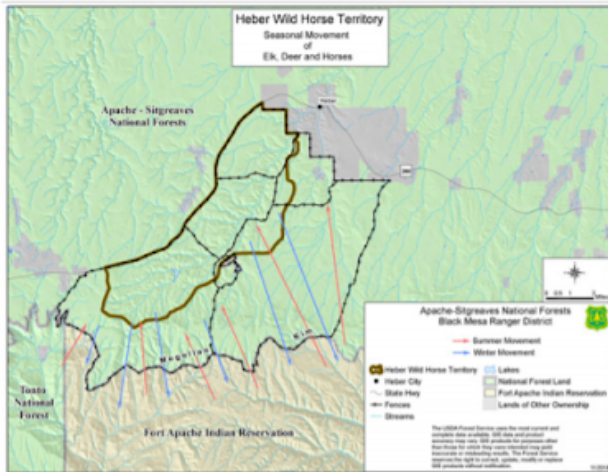
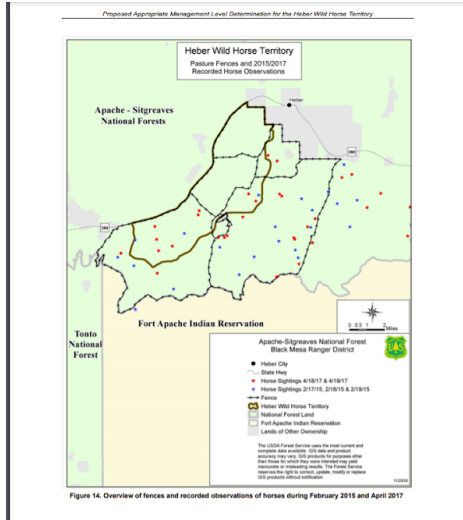


Figure 13. Seasonal movement of large ungulates in the project area, in relation to the territory

To further understand how horses are using the area, historic and current district files (USDA Forest Service 2210 files) were examined, as well as incidental observations and the aerial survey results discussed above. District files included range inspection forms, correspondence, allotment management plans, stocking records, production and utilization studies, and general file notes. These all indicate spring-to-fall horse use is currently occurring in the southern (higher elevation) portion of the territory and locations outside of the territory. The general area of horse observations during the latest aerial surveys (winter and spring) are displayed in figure 14.

There is no map of the Shootings in this timeframe.  
There is no map of the round ups of "Trespass horses"

Are the two allotments with almost no horses the allotments and this is the supposed wild Horse Territory? The forage monitoring is not relevant because the horses are not there and it is the wrong area.



“Determination of Cover and Space Sufficiency The above discussion indicates the horses have not been and are not consistently utilizing all the delineated territory. Based on aerial surveys and on-the-ground observation, horses are primarily using the southern portion of the territory during the spring, summer, fall, and mild winters. There is an assumption the horses may move to areas of lower elevation outside the territory or off the Mogollon Rim during severe winters following the behavioral patterns observed with the wildlife, but monitoring data specific to horse use patterns is lacking. As noted in the Bureau of Land Management Wild Horse and Burro Handbook (USDI Bureau of Land Management 2010), a recurring pattern of movement out of a territory to access forage, water, or thermal or hiding cover is an indication the territory cannot sustain year-long horse use. **However, there appears to be sufficient forage, water, and cover available within the territory. It appears the fences within the territory are likely limiting movement to the lower elevations in the north;** while snow accumulation in parts of the territory effectively push large ungulates to lower elevations during severe weather. While these observations indicate the cover and space may be insufficient in the territory, **we cannot ascertain with certainty why wild free-roaming horses are moving off the territory.** Additional monitoring is needed to better understand how horses are using the territory.”

ANSWER: The USDA FS is not protecting or studying these wild horses under the rule of law.

EMS TRANSMISSION 06/28/2013

Instruction Memorandum No. 2013-146

Expires: 09/30/2014

To: All Field Office Officials (except Alaska)

From: Assistant Director, Renewable Resources and Planning

Subject: Exception to Policy in BLM Handbook H-4700-1 and Manual 4720.41: "Helicopter Gather of Wild Horses and Burros between March 1 and June 30" Due to Emergency Conditions and Escalating Problems

**Program Areas:** Wild Horse and Burro Program

**Purpose:** This Instruction Memorandum (IM) provides guidance to Authorized Officers (AO) regarding the potential need to gather wild horses utilizing helicopters within the current "annual foaling season helicopter gather closure period" under emergency, and some situations or conditions, resulting in escalating problems. This IM amends guidance in the Wild Horse and Burro (WH&B) Handbook H-4700-1 issued in June 2010, as well as Bureau of Land Management (BLM) Manual 4720.41 issued in July 2010. It authorizes AOs to use helicopters to assist in the gathering of wild horses between the dates of March 1 and June 30 of a given year. This option is crucial to the BLM mission to protect wild horses on the range in a humane manner while allowing for multiple uses of the public lands.

**Policy/Action:** The peak of foaling for the majority of the wild horse herds on public lands in the West falls within a period from mid-April to mid-May. It has been the BLM's policy to prohibit the use of helicopters to assist in the capture of wild horses during the peak foaling period and for the six weeks before, and the six weeks following, the peak of foaling. Therefore, the use of helicopters to capture wild horses has been prohibited by policy from March 1 until June 30. Helicopters may be used year-round in the capture of wild burros as they may foal throughout the year and do not exhibit a specific foaling season.

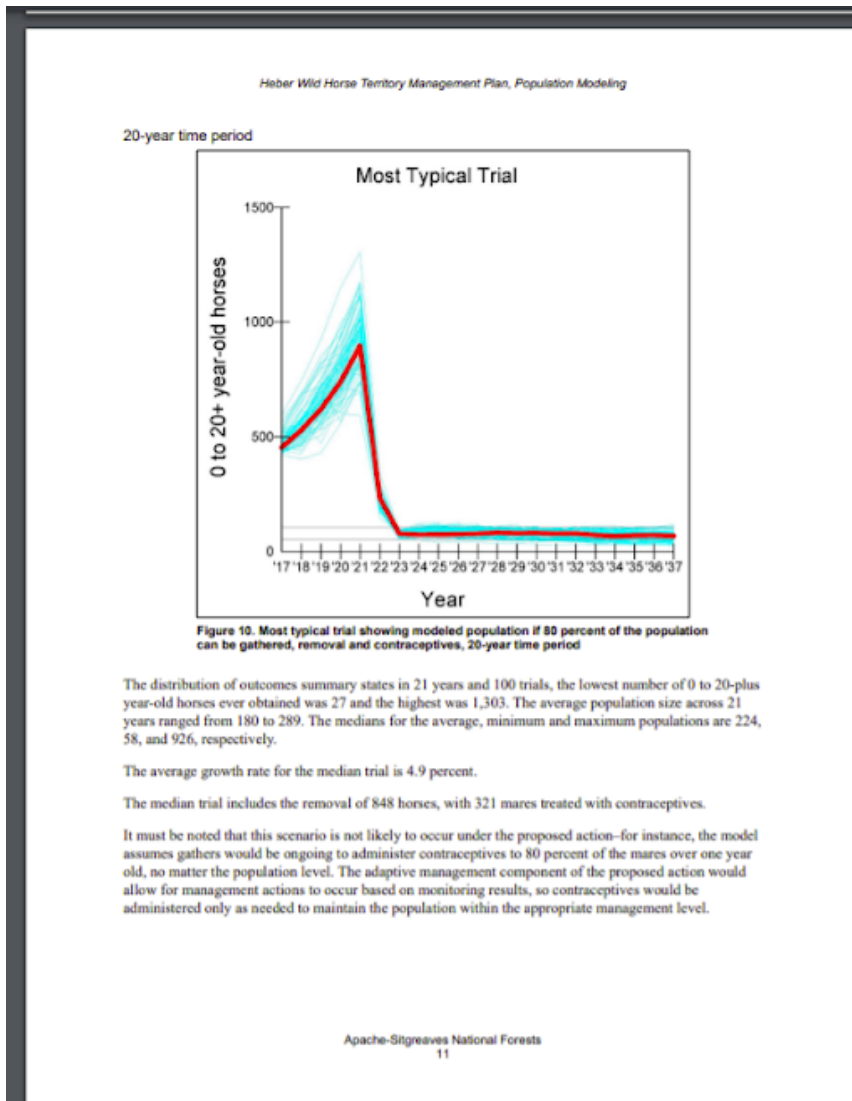
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This IM describes a new exception to the above policy that could be exercised during emergencies and some situations or conditions resulting in escalating problems that threaten the health and welfare of wild horses. Emergency and Escalating Problems are defined in the WH&B 4700 Handbook as follows: emergencies<sup>[1]</sup>: “unexpected events that threaten the health and welfare of a WH&B population and/or their habitat;” and escalating problems: “conditions that deteriorate over time. The key indicators are a decline in the amount of forage or water available for WH&B use, with negative impacts to rangeland health and



Page 32: The tier 1 analysis determined the four essential habitat components are sufficient (with some limitations) and **the area is capable of supporting free-roaming horses**



“The distribution of outcomes summary states in 21 years and 100 trials, the lowest number of 0 to 20-plus year-old horses ever obtained was 27 and the highest was 1,303. The average population size across 21 years ranged from 180 to 289. The medians for the average, minimum and maximum populations are 224, 58, and 926, respectively. The average growth rate for the median trial is 4.9 percent. The median trial includes the **removal of 848 horses**, with **321 mares treated with contraceptives.**”

“ It must be noted that this scenario is not likely to occur under the proposed action—for instance, the model assumes **gathers would be ongoing to administer contraceptives to 80 percent of the mares over one year old, no matter the population level.** The adaptive management component of the proposed action would allow for management actions to occur based on monitoring results, so contraceptives would be administered only as needed to maintain the population within the appropriate management level.”

**CAES et al. QUESTIONS/ISSUES include:**

- 1. Contraceptives need to be administered proactively to avoid round ups.**
- 2. We should monitor how many foals are taken by the wolves, bears and Mountain Lions and the anti-rule of law Militia.**
- 3. It does not sound like the wild horses will be darted ON THE RANGE**
4. “Primarily Bait and trap methods” means there are **some Helicopter Round-ups.**
5. Round ups are expensive and there is no cost analysis.
6. In this scenario the deaths from shooting have not been accounted for.
7. There is no discussion as to where the horses would be darted
8. There is no cost analysis
9. There is no genetic analysis
10. No humanitarian analysis
11. No wild horse lives out it’s life on the “Wild Horse Territory”
12. Wild horses are managed as livestock and this is a puppy mill feeding a meat market.
13. This has a huge cultural and economic impact.
14. No mention of taking a year off to ensure the horses are not sterilized in the 5th year.
15. Is this native PZP registered as Zona Stat H, PZP 22, or is it Gonacon, SpayVac or IUD?

## **ATTACHMENTS**

### **Attachment 1 - HEBER Wild HORSE HISTORY**

YEA R	STATEMENT	Source - Self, Court, Government, Affidavit	Horse details	Nu mb er of Hor ses rou nde d up, pus hed ont o Sov erie gn land s, or sold	Price	B u y er
1967	<p>Doy Reed Head Fences was always in bad shape. Run more wild horses than cows. I didn't know 180 to 200 wild horses. It had a big snow storm ust smashed the fence down. Nobody was cowboy enough to drive em back. They fixed the fences. Old ranger wanted them gone because he was afriad they's make a wild horse refuge. I'll buld the traps. whatever you get is yours. They were unbranded and on fors=rest service lands. We caught 187 horses and hauled them to sale. These were wild horses but we pretty well cleaned it up.</p>					



1967	This story was in the Court Case: BIG Snow Storm, fence came down because of snow. went down than 800 made their way into Black Mesa. These were supposedly ferals. This is a higher altitude (rim) than the mesa where there is more graing. This was way before the chedeski Fire, it was very very thick. There is no way they could have gotten all the horses out of the forest.	Stacy Sanchez Affidavit				
1967	The migrate from the rim toward Holbrook a lower altitude.	Stacy Sanchez Affidavit				
1971	Act Passed	Government Congressional Record				
1971	Per WHOA FOIA Forest Service Regional Office states that the horses were present and unclaimed in 1971. "unclaimed animals from the Fort Apache Indian Reservation along with some animals that were abandoned when a local family moved away from the area." They admit they were present and unclaimed hence,					

	they were wild pursuant to _____					
1973	<b>Territory Established (7)</b>	19,700 acres per ASGNF Land Use Plan pg 118	Joint Report to Congress states 14,000 acres in 1995			
1974	7					
Jul-7 4	<b>WILD HORSE TERRITORY ESTABLISHED IN 1973 DENIED (7) Capture Agreement Buckskin, Gentry, Heber -- White Mountain Apache Horses. Trespass Case written. Horses were rounded up and sold at public auction.</b>	<b>Bruce J Mortensen Forest Officer, USDA FS</b>		???	???	
June 17th 1976	<b>Kleppe v New Mexico (5)</b>	<b>Horses off a WHT or HMA are still wild and protected. The 1971 Act is Constitutional</b>				
1976 Cens us	Joint Report to Congress states 5 horses					
1978 Cens us	Joint Report to Congress states 3 horses					40

1980 Census	Joint Report to Congress states there are only 8 wild horses on USDA FS lands in Az					
1982 Census	Joint Report to Congress states 5 horses					
1983	I have been coming up here since 1983. Our Cabin which was up on the rim, it has been covered in snow since then, it collapsed from snow in 2000. Once and a while we would see horses around Black Canyon Lake and see horses, there and in Phoenix Park Wash, Sho and east of Overgaard in this time frome.	Stacy Sanchez Affidavit				
1984 Census	Joint Report to Congress states 7 horses					
1984	I left you guys 12 but I only had to leave you 7. Larry Gibson I rounded up 180 horses I ran back to the reservation. Stacy Sanchez "You ran em over there wild and their coming back ferals."	Statement Directly to Stacy Sanchez from Gibson on about a year after the fact and is included in Stacy Sanchez Affidavit.			180	

9/4/1984	<p>Notice of intent to Impound</p> <p>Ref: FSM 5330- Buckskin and Gentry Allotments . . . Livestock not sold at public sale may be sold at private sale or condemned or destroyed or otherwise disposed of as provided by Regulation 36 C.F.R. 262.2(f)</p>	Nick W.Mc Dounough Forest Supervisor, Springerville Az	60 head of mixed horses, unbranded, including a mixture of bays, blacks, duns, sorrels greys, browns, one white stallion, and including horses, mares, and colts.	60		
1986 Census	Joint Report to Congress states <b>5</b> horses					
1987	Cozy letter regarding an agreement between the FS and the AZLB and FS keeping title of non-branded horses and sell directly	From: Earl Kinny of Az Livestock Board To: Nick McDonough of the USDA FS				
1988	<b>5</b>					
2/1/1988	USDA FS to Bill Owens	Douglas D Hardy	1		\$19.96	
	4/7 to 6/7 1988 Bill of Sale of impounded Livestock, posted at Navajo County CourtHouse	Mel Wilhelm, Zone Biologist, Apache Sitgreaves Nation			\$365.38/100	

4/16/1988	Joint Report to Congress states 5 horses	Bruce Mortensen USDA FS sold to Bill Owens	1 horse, a " Buckskin stud"		\$116	
1988 Cens us						
4/26/1988	Notice to Impound Wildcat Buckskin Gentry, Black Canyon allotments	By USDA FS Nick McDonough	Various no.s of branded and unbranded horses and burros			
5/11/1988	Capture of Trespass Horses, Traps daily, \$100/horse plus \$2 per day food	USDA FS Violet Mills Contract Specialist to Doy Reifd Head			\$5,000	

6/x/1988	Range Inspection Report Buckskin Gentry- 200 excess Indian Trespass horses	Bru ce Mor ten son For est Offi cer				
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6/7/1988	USDA FS Bill of Sale	to Bill Owens at Valley Livestock Auction, Az by Miles P Havalan	5 horses No brands	\$207.14	
6/13/1988	USDA FS Bill to Valley Livestock	USDA FS to Valley Livestock	16 horses	\$211.63	
6/13/1988	USDA Invoice - Receipt Springerville Az	USDA To: Doy Reidhead From: Nesbit	6 horses Horse Capture 1 (15%)	\$730	Valley Livestock

		C Drill , Pat Hav ala n				k A u c t i o n , A z N o b r a n d s , o w n e r o n a u c t i o n t i c k e t s h o w s U S D A F o r e
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					st S e r v i c e S p r i n g e r v i l l e , A z .
6/13/19 88	Bill of Sale	US DA FS Acti ng For est Sup ervi sot Han ibar at Vall y Live stoc k Auc tion	1 horse		\$10



		to Chri s Cirri er			
6/13/19 88	Receipt sold for USDA FS Springerville by Valley Livestock	Sol d by US DA FS to auti on to Bill Ow ens and Chri s Cur ries	6 horses		\$212
6/22/19 88	USDA FS Bill of Sale	US DA FS to Bill Ow nes fro m Bru ce Mor ten sen Ran ge	4 horses no brands		### #####

		Staff			
6/27/19 88	USDA FS Bill of Sale of impounded Livestock	US DA FS Bru ce Mor ten sen to Chri s Cur ries	1	95	\$25.
6/27/19 88	Valley Auction House sold for USDA FS		4 horses no brands	### #####	
1988	May 12 1988, unknown number lots of 10 or more. Doy Reed Head rounded up horses. His receipt/agreement 100/horse roaming at large on the Gentry and Buckskin allotment pending disposal by the US Forest Service . Lots of 10 or more. In the Heber District. Traps will be checked daily.				
6/29/19 88	USDA FS Bill for Collection to Valley Auction House , Alb		5		\$175.69
7/11/19 88	USDA FS Bill of Sale	Bill Ow ens by Bru ce	2		69.88

		Mor ten sen Ran ge Staf f			
7/11/19 88	USDA FS Bill of Sale	Bill Ow ens by Bru ce Mor ten sen	7	605	
1989	Saw the wild horses hanging around the Hatcheries, my daughter was 7 at that time. Looking for pics. I am sure she would remember. Early 89 or 88 because my father bought the new Bronco in late 89.	Sta cy San che z Affi davi t			
7/14/19 88	USDA Forest Service Bill for Collection Springerville to Valley Livestock Auction in Alb NM.	<b>The US DA FS has app are ntly hid den thei r</b>	9	\$674.88	

		<b>illegal slaughter of these wild horses by sending them through NM. Under color of law FSM</b>			
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