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Attn: Administrative Review Staff

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Submitted online at [US Forest Service NEPA Project Public Reading Room](#)

Objection Regarding Data Accuracy in the Heber Wild Horse Territory Management Plan Final Environmental Assessment

I am submitting this objection based on new information that became available after the close of the designated comment periods.

According to the Heber Wild Horse Territory Management Plan Final Environmental Assessment (Final EA) page 46, band observation data was collected on and off the Territory between April and September 2021. The stated purpose of this data collection was to identify individual bands and assess their movements relative to the Territory. Data collected included date, location, total number of horses per band, sex and age classifications (studs, mares, foals, yearlings, two-year-olds, bachelor horses), color, average body condition scores, and sex ratios within age classes. Bands were identified primarily by key features of the stallions, with identifying photos taken of stallions and general photos of the rest of the band. The Forest Service states that this observation data is available in the project record.

However, the accuracy of this band data is called into question. Photo evidence obtained through a Freedom of Information Act (FOIA) request indicates that a single buckskin bachelor stallion with highly distinctive markings was counted as three separate individuals. This type of error undermines the credibility of the data and may affect conclusions drawn about herd composition, movement patterns, and population management strategies.

Further, two of the three attached photos demonstrate that bachelor bands 29 and 33 are actually the same band, with the only difference being the presence of one additional horse in band 33. This suggests that the same band was counted as two separate groups, again inflating population data and misrepresenting herd structure. Errors of this nature call into question the overall reliability of the band observation dataset used in the Final EA.

Because this information forms a foundation for management decisions in the Final EA, it is essential that the data be accurate, verifiable, and scientifically defensible.

Using Inaccurate Data in the Final EA as Evidence of Improper Conduct and Its Impact on Wild Horse Management

The inclusion of inaccurate or unverified data in the Forest Service's Final Environmental Assessment (EA) for the Heber Wild Horse Territory is highly relevant because it demonstrates a lack of scientific rigor and accountability in the agency's decision-making process. When the foundational data used to assess wild horse populations is flawed, any conclusions drawn from that data—such as claims that the wild horse population is “excessive” or that horses are degrading the habitat—are inherently unreliable and potentially misleading.

In the case of the Heber Territory, the Forest Service has cited inflated or unverifiable population estimates without providing transparent methodology or consistent monitoring data. This undermines the credibility of the entire EA and raises serious concerns about whether management decisions are being driven by objective science or by a predetermined agenda to reduce wild horse numbers.

Using inaccurate population numbers directly threatens the freedom and long-term viability of the Heber wild horses. Overstating population levels can be used to justify unnecessary removals, increased roundup activity, or the implementation of fertility control measures that may not be warranted. Such actions disrupt wild horse social structures and violate the intent of the Wild Free-Roaming Horses and Burros Act, which was enacted to preserve these animals as “living symbols of the historic and pioneer spirit of the West.”

Moreover, this pattern of using flawed data appears to be consistent across the Forest Service's broader monitoring efforts. For example, assessments of habitat degradation or range conditions often fail to isolate the impact of wild horses from other factors such as cattle grazing, drought, or land misuse. By selectively attributing environmental impacts to horses—without robust comparative studies or peer-reviewed ecological analysis—the agency reinforces a biased narrative that vilifies the horses while downplaying other contributing factors.

In summary, the use of inaccurate data in the Final EA is not just a technical flaw—it is a systemic issue that calls into question the Forest Service's commitment to transparency, scientific integrity, and legal compliance. If left unchallenged, these false claims can lead to misguided management decisions that strip the Heber wild horses of their freedom, diminish genetic diversity, and ultimately threaten the survival of this unique, naturally self-sustaining herd.

Attached: 3 photos providing visual evidence of misidentification and duplicate band counts.

Suggested Remedies

To address these concerns and improve the integrity of the management planning process, I respectfully request the following actions:

Reanalyze the 2021 band observation data, using photo documentation to correct misidentifications and eliminate duplicate counts.

Conduct an independent, third-party review of the band observation data to verify its accuracy and ensure transparency.

Incorporate publicly sourced data, such as photographs and field observations from local advocates, citizen scientists, and photographers familiar with the Heber herd, to assist in accurately identifying horses and tracking band composition.

Revise and reissue the Final Environmental Assessment, if data inaccuracies are found to significantly influence any conclusions or proposed actions.

Develop a transparent data verification protocol for future monitoring, including public access to raw data, photographic records, and documentation of identification methods.

Suspend implementation of management actions under the current EA until the data integrity concerns have been addressed and any necessary revisions are completed.