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First name: Betty
Last name: Nixon
Organization:
Title:
Comments: Comment #1:
Page/Figure/Number:
Overall Proposed Action

Recommended Change:
In light of the absence of a Management Plan for the Heber Wild Horse Territory between 1971 and 2020 (c. 50 years), and with the dramatic changes in the horse herd and the overall area since the Territory was first established in 1974, a full reassessment of the Heber Wild Horse Territory and of the Heber Wild Horse Herd is warranted in order to develop a meaningful Management Plan. A current Inventory Procedure should be conducted, similar to what was recommended by the R3 Regional Forester in 1973 (but which was not done), wherein data is collected and recorded over time to identify herd unit boundaries, identification of the total number of animals by age class, feeding habits by time of year and weather conditions, territorial limits, habitat frequented, seasonal distribution or movement, external influences and the effect of other animal species on horse behavior. In light of the significant influx of summer residents and the mass influx of recreationists to the area in summer months, the effect of the presence of a large concentration of people (hunting, camping, fishing, hiking, recreational vehicles, etc.) should also be included in the assessment. With 44 tons of camper trash left behind for clean-up in a single year, the environmental impact of people on the forest and on the horses needs serious consideration and assessment. There are very few horses actually using the "Territory", and a thorough assessment is needed to determine why. Consideration may need to be given to establishing new Territory boundaries conducive to today's conditions. Because the Forest Service and Ranchers have had a close and multi-generational partnership with the common goal of eradicating the horses (historical documents will be provided in a separate comment), this assessment should be done by an objective 3rd party.

Supporting Reason:
Basing a Plan on conditions that may or may not have been true 50 years ago, with no Management Plan or ongoing management in place for the last 50 years, and with significant intervening factors in the interim, is unreasonable. The establishment of the Heber Wild Horse Territory in 1974 appears to have been done in an arbitrary and capricious manner. Inventory Procedures handed down from the Assistant Regional Forrester, W.R. Fallis, to the R3 Forest Supervisors in a Memo dated March 13, 1973, were not followed. The data collection and recording of findings to determine the number of horses, their migration pattern, etc. was never completed as outlined in the Inventory Procedures. A proper Inventory Procedure for the Heber Wild Horses has never been conducted. A current and thorough assessment is warranted. Aerial surveys completed in recent years show the horses are largely not even on the Territory. Aerial surveys appear to show no horses on the northern half of the Territory, and it appears they cannot even access that part of the Territory due to being cut off by cattle allotment fencing. Black Canyon Lake, a major recreational area, is in the southern portion of the Territory. The Territory and the herd dynamics have vastly changed and have been unmanaged since 1971. A current and thorough assessment is warranted, taking into consideration today's conditions and herd dynamics. It's time to do the right thing for these horses, not just do what is expedient for the Forest Service and the Ranchers.

Reference/Citation/Additional Info.:
Memo dated March 13, 1973 from Assistant Regional Forester W.R. Fallis to Forest Supervisors, R3, with Enclosed Inventory Procedures (20 pages)
Memo dated January 15, 1974 from Forest Supervisor, J.S. Tixier to Regional Forester, R-3, with estimated number of horses and Enclosed Territory map (2 pages)
Figure 14. Overview of fences and recorded observations of horses during February 2015 and April 2017 (1 page)