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Comments: Comment #2:

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Heber Wild Horse Territory Management Plan Proposed Action, Pages 6-7, re: Ethnographic Study and Recommendations from the Ethnographic Study (USDA Forest Service 2017)

#### Recommended Change:

The ethnographic study was completed under the false premise that only the history of horses on the Territory was relevant to the study. Need to update the Plan to state the "true" and "complete" history of wild horses in the area. The partial alleged history provided through the ethnographic study is largely hearsay, speculation and stories passed down and passed around a small community of ranchers and Forest Service personnel who have, for decades and down through the generations, sought to eradicate the wild horses and who did so using cruel and inhumane methods (see attached historical documents). Most of the individuals interviewed did not have "good to extensive knowledge of the territory and area", or "extensive knowledge of the herd". The summary of the interviews conducted provided in the Proposed Action on page 7 is inaccurate and grossly biased towards a singular desired goal/outcome. The concept of an "original designated herd" is a flawed concept to begin with. The horses have never been confined to the Territory. The 1971 Wild Free-Roaming Horses and Burros Act does not limit Wild Free-Roaming horses to an established Territory. They are "Free-Roaming", meaning it is not appropriate to limit the history of the Heber Wild Horse herd to just what may have been observed in 1973 in just a small area of a forest that spans hundreds of thousands of acres. Interestingly, one of the interviewees said 400-500 horses came over from the Reservation after the 2002 fire during the period of about 3 years when the fences were under repair. This man with allegedly "extensive" knowledge said he believes the horses reproduce at a rate of 30% per year. Doing the math, there would be over 20,000 horses out there in 2020 if you use a "middle" count of 450, starting in 2005. Recommendations and decisions need to be based upon the "true" and "complete" history of wild horses in this area.

#### Supporting Reason:

Attached are articles from The Holbrook Argus, The Holbrook News and The Coconino Sun from the late 1800s and early 1900s clearly showing historically that wild horses occupied this area in large numbers long before the 1930s. Also attached is an excerpt from a book titled "Hashknife Cowboys" (1922-1934), showing there were wild horses in the area in the 1920s and early 1930s (long before any retired Army remounts were allegedly turned out in the late 30s). The author tells how the Forest Service paid a \$5 bounty for every wild horse shot and the ears brought in during the 1930s. Attach is also the "Memorandum for Forest Officers" and excerpts from the court documents that appear to precipitated this action. The Memorandum is dated April 22, 1931. Attached are also some excerpts from a Ranger Meeting in September 1910 wherein stories were told related to the wild horses. The available historical documents that prove the "true" history of the wild horses in the area are not limited to the just the documents I have attached here. These are just some examples that clearly show the ethnographic study was a flawed and skewed process for determining the history of the wild horses in only one small area of the vast Sitgreaves National Forest. The ethnographic study is completely disproven and should not be the basis for any recommendations or decisions. The ethnographic study is mostly hearsay and speculations of people who do not have "extensive" knowledge of the subject. The Summary of Findings from the ethnographic study is inaccurate and grossly biased toward a desired outcome. The concept of an "original designated herd" is a flawed concept. The horses have never been confined to a small Territory. They are free-roaming IAW the 1971 Wild Free-Roaming Horses and Burros Act. After the passage of the Act, there were no proper Inventory Procedures followed to determine the number and makeup of Wild Free-Roaming horses in the area, which constitutes hundreds of thousands of acres of forest land. The horses did not simply "dissipate" as stated in the Proposed Action. Wild horses were cruelly run down and gunned down in the late 1800s and early

1900s. They were gunned down in the 1930s. Even after passage of the Wild Free-Roaming Horses and Burros Act in 1971, the Forest Service paid local ranchers to trap and remove horses in large numbers in the 1980s and 1990s, completely in violation of the 1971 Act, without determining their protected status under the Act. The entire ethnographic study was premised on a false concept, it is biased and predominately based on hearsay and speculation, rendering the entire ethnographic study useless. The interviewees did not have "extensive knowledge" as was stated in the summary.

Reference/Citation/Additional Info.:

Newspaper archive articles from The Holbrook Argus and The Holbrook News

Newspaper archive articles from The Coconino Sun

Excerpts from the book titled "Hashknife Cowboys" (1922-1934)

April 22, 1931 "Memorandum for Forest Officers" and excerpts from the related court documents

1910 Excerpts from "Men Who Matched the Mountain"