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First name: Cyndi

Last name: Tuell

Organization: Western Watersheds Project

Title: Arizona and New Mexico Director

Comments: Please see the attached comments submitted on behalf of Western Watersheds Project and let me know if you have any questions. Thank you, Cyndi

Dear Mr. Best,

The following comments are submitted on behalf of Western Watersheds Project with regard to the Heber Wild Horse Territory Management Plan Project. As you are certainly aware, Western Watersheds Project is keenly interested in the ecological health of the public lands in the Apache- Sitgreaves National Forests and has a long history of advocating for protection from livestock damage to these public lands. Western Watersheds Project is the nation's foremost conservation organization working to sustain and recovery healthy public lands from a grazing perspective. Although we do not take a position on wild horses, pro or con, we do seek to reduce the much more ecologically significant impacts of domestic cattle and sheep, and to ensure that federal agencies uphold the rule of law.

We noticed with particular interest that the Wild Horse Territory overlaps with two livestock grazing allotments [ndash] the Black Canyon (60% overlap) and Heber (6% overlap) allotments, and includes the King Phillip, Sharp Hollow, Stermer, Gentry, and Bunger pastures. A large portion of the Wild Horse Territory also overlaps with the perimeter of the 2002 Rodeo-Chediski Fire.

This project covers approximately 19,700 acres across two counties in the Black Canyon area of the Black Mesa Ranger District. The Forest Service has identified relevant direction and guidance specific to this project and this area and includes reference to the Forest Service Manual (FSM) 2200 (Range Management) and 2260 (Wild Free-Roaming Horses and Burros, as well as the 2015 Land and Resource Management Plan (LRMP) for the forests.

The Forest Service proposed action for this project describes burned area rehabilitation projects (seeding) that took place in 2002 that [ldquo]became desirable forage for horses and some wildlife.[rdquo] PA at 6. The Forest Service fails to describe how livestock grazing impacted the rehabilitation projects.

However, the Forest Service does explain that livestock pasture fences are apparently restricting wild horse movement to the southern and eastern portions of the project area and causing most of the horse use to occur outside the designated Wild Horse Territory. PA at 9.

As the Forest Service prepares the Environmental Assessment (EA) for this project, WWP recommends the following:

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- * Disclose and compare the number of wild horses versus livestock authorized in the project area and include a ratio of the number of livestock:wild horses
- * Identify how livestock grazing is displacing wild horses
- * Identify how livestock grazing is contributing to the cumulative impacts associated with wild horse use of overlapping areas
- * Consider an alternative that reduces the Animal Unit Months (AUMs) allocated to livestock in areas where there are conflicts between horses, wildlife, and livestock
- * Analyze how reducing the number of AUMs for livestock impacts the [ldquo]appropriate management level[rdquo] for wild horse populations

- * Analyze an alternative that removes all livestock grazing from the project area, including the removal of livestock fencing and describe how that will impact the [ldquo]appropriate management level[rdquo] for wild horses
- * Analyze how predators contribute to healthy wild horse populations
- * Analyze how livestock management negatively impacts predator populations and how that impacts wild horse populations
- * Analyze and disclose the costs associated with reducing wild horse populations through pasturing in holding pens as part of the Federal Wild Horse Program

The impact of wild horse herbivory and herbivory by livestock (both cattle and sheep) are cumulative on the health of rangelands within the project area. The Forest Service has a duty under NEPA to analyze these cumulative impacts.

WWP is concerned about the proposal to use vegetation treatments to remove juniper or other native vegetation via mechanical thinning or prescribed fire. In our experience, vegetation treatments are often used to artificially prop up the livestock grazing industry on federal public lands by removing native vegetation livestock (cows) don[rsquo]t eat, but that provide important habitat for wildlife. Please explain and provide scientific support that vegetation thinning or burning would support wild horse management and would not harm wildlife for any proposed alternatives that include vegetation thinning or burning.

While determining thresholds for wild horse removal, the Forest Service is apparently going to consider utilization exceeding 35% on over 30% of the key monitoring areas for two consecutive years or any 2 years out of 5 as a rationale for removing wild horses. Please explain how the Forest Service will know whether wild horses or livestock are the cause of the utilization over 35%. Will the Forest Service first consider removing livestock from the areas where utilization exceeds 35%? If not, please explain why not.

We have similar requests for other indicators of overutilization [ndash] how will the Forest Service determine that it is wild horses and not livestock and associated infrastructure that are responsible for changes in herbaceous species composition, water availability, ground cover, and forage availability.

The proposed action includes the installation of seven roadside dirt tanks, two [ldquo]working facilities,[rdquo] and a fence to be used as a trap or holding fence. It appears that much of this new infrastructure will be installed in the areas where wild horses are currently fenced out of due to pasture fencing. Please detail exactly how this new infrastructure will benefit wild horses or impact their movements if the pasture fences remain in place. Would any of this infrastructure be used by livestock permittees or their livestock?

For the management tools identified in Appendix A, WWP asks the Forest Service to add the following:

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- * Tools to change patterns of horse use and to maintain horse health and habitat: remove livestock from the landscape and remove livestock fencing
- * Tools to maintain horse health and habitat: in times of severe drought, remove livestock from the landscape

Thank you for your full consideration of our comments and concerns. We look forward to reviewing future NEPA documents for this project. Please ensure that we are advised of the availability of any forthcoming NEPA documents and that WWP remains on the contact list/interested party list for this project.

Sincerely,