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Organization:

Title:

Comments: Please see the attached comments in response to your Heber Wild Horse territory management plan.

PLEASE SEE BELOW THE KEY POINTS THAT I WOULD LIKE TO ADDRESS IN REGARDS TO YOUR MANAGEMENT PLAN FOR THE HEBER WILD HORSES

* YOU STATE IN YOUR PLAN THAT YOU ARE PLANNING ONLY TO DEVELOP A PLAN WITHIN THE BOUNDARIES OF THE 19,700 ACRES. ANY HORSES OUTSIDE THIS BOUNDARY WILL BE COLLECTED AND REMOVED. HOWEVER, THE FS REGULATIONS DEFINE WILD FREE ROAMING HORSES AND BURROS AS [ldquo]ALL BRANDED AND UCLAIMED HORSES AND BURROS AND THEIR PROPERTY THAT HAVE USED LANDS OF THE NATIONAL FOREST SYSTEM ON OR AFTER DEC 15, 1971. ANY HORSES AND OR BURROS OUTSIDE OF THE TERRITORY IS PART OF THEIR HABITAT.

* YOUR PLAN STATES THAT THESE REMOVAL OF HORSES WILL BE SEND TO TEMP HOLDING PENS.. THE FS DOES NOT HAVE THE MEANS TO SUPPORT THIS STATEMENT AND DOES NOT HAVE A CURRENT CONTRACT WITH THE BLM TO HOUSE THE HEBERS AND OR BURROS THAT ARE CAUGHT.

* FS WERE SUPPOSE TO HAVE COMPLETED A CENSUS OF THE ENTIRE SITGREAVES NATIONAL FOREST AND DRAWN THE BOUNDARIES OF THE TERRITORY AROUND WHERE THERE WERE WILD HORSES AND INCLUDE THEIR MIGRATIONS AND TERRITORIAL LOMITS AS I CALLED FOR IN THE WFHBA THE FS REGULATIONS.

* WHAT IS THE KNOWN TERRITORIAL LIMITS OF THE HEBER HERD? FS HAS FAILED TO PROVE THIS

* HOW CAN YOU TELL THE LIMITS WHEN THERE IS SO MANY FENCING PREVENTING THEM FROM MOVING TO ONE AREA TO THE NEXT. WHAT ARE THE MIGRATORY PATTTERS? WHERE IS YOUR PROOF AND OR STUDIES TO REFLECT THE TRUE NUMBERS? FS HAS FAILED TO PROVE THIS INFORMATION.. .THEREFORE, YOUR HERESAY IS NOT CORRECT.

* NEPA- REQUIRES THE FS ADEQUATELY EVALUATE ALL POTENTIAL ENVIRONMENTAL IMPACTS OF PROPOSED ACTIONS. THE FS HAS FAILED TO IDENTIFY AND DISCLOSE TO THE PUBLIC ALL FORESEEABLE IMPACTS OF THE PROPOSED ACTION, INCLUDING DIRECT, INDRECT AND CUMULATIVE IMPACTS[hellip] RE EXAMPLE: CATTLE. HUGE IMPACT ON THE HORSES TERRITORY..

* I REQUIRE THAT ANY NEPA ANALYSIS OF THIS PROPOSED ACTION INCLUDE BUT NOT BE LIMITED TO A THOROUGH CONSIDERATION OF THE FOLLOWING SIGNIFICANT IMPACTS OF THIS ACTION.

* IMPACTS ON THE GENETIC VIABILITY OF THE HEBER WILD HORSES POPULATION

* SOCIAL, BEHAVIORAL AND PHYSIOLOGICAL IMPACTS OF THE STRESS OF CAPTURE AND CAPTIVITY ON WILD HORSES

* SOCIAL, BEHAVIORAL AND PHYSIOLOGICAL IMPACTS OF POPULATION GROWTH CONTROL MEASURES ON WILD HORSES

* THE ECOSYSTEM IMPACTS OF REMOVING WILD HORSES FROM PUBLIC GRAZING LAND, IN COMPARISON TO THE

* IMPACTS OF HELICOPTER DRIVE TRAPPING ON WILD HORSES AND OTHER WILDLIFE

* THE ECONOMIC IMPACTS OF REQUIRING TAXPAYERS TO ABSORB THE ASTRONOMICAL COST OF THESE CAPTURES AND MAINTAINING ANY ADDITIONAL WILD HORSES AT USFS OR BLM HOLDING FACILITIES, AND

* THE ETHICAL IMPACTS OF A WILD HORSE MANAGEMENT PROGRAM THAT TAKES WILD HORSES OUT OF THE FOREST AND DOOMS THEM TO A LIFETIME ON USFS OR BLM FEEDLOTS AND OR BEING SOLD WITH NO RESTRICTIONS OR OVERSIGHT

* THE IMPACT OF INCOME OF LOCAL BUSINESS IN FOREST LAKES AND OR HEBER WHERE MULTIPLE PHOTOGRAPHERS COME ALL OVER THE WORLD TO TAKE PICS OF THE HEBER WILD HORSES WHICH IN RETURN GENERATES ADDITIONAL INCOME TO THE LOCAL STORE FRONTS, HOTELS, CAMPING[hellip] ETC.

* USFS SHOULD BE FOCUSED ON PROTECTING NATURAL, FREE, WILD HORSE POPULATIONS ON THE RANGE AS THE UNITED STATES LAW REQUIRES AND NOT ROUNDING UP WILD HORSES AND CONFINING THEM ON PUBLIC OR PRIVATE FEEDLOTS.

* FS HAS FAILED TO MEET THE REQUIRED GUIDELINES FOR THE WORKING COLLABORATIVE GROUP. ONE OF YOUR MEMBERS WAS LET GO AND NOT REPLACED. EVERYONE IN THIS COLLABORATIVE GROUP WAS EITHER BACKED BY CATTLE ASSOCIATIONS, RANCHERS AND PROSLAUGHTER OF THESE HORSES. FS HAS FAILED TO HAVE AN EQUAL AMOUNT OF PEOPLE IN THE GROUP FOR PRO HORSES. THE MEETINGS WERE BOGUS AND DID NOT DOCUMENT REQUIRED INFORMATION IN A TRUE MANNER .

* THERE HAS NEVER BEEN AN EIS FOR A HERD MANAGEMENT PLAN AND THAT MUST BE DONE FOR A PLAN IMPLEMENTED ON LAND CONSIDERED [ldquo]SPECIAL AREAS[rdquo] AREAS IN THE NATIONAL FOREST SYSTEM DESIGNATED FOR THEIR UNIQUE OR SPECIAL CHARACTERISTICS.

* THE WORKING GROUP DID NOT MEET IN PUBLIC, WOULD NOT ALLOW MEMBERS OF THE PUBLIC TO ATTEND OR CALL IN ON THE PHONE MEETINGS, VIOLATING OPEN MEETINGS LAWS THEY WERE REQUIRED TO FOLLOW. FOR THAT REASON, THE WORKING GROUP AND ALL RECOMMENDATIONS SHOULD BE DISMISSED FROM THIS HMAP AND ALL FUTURE DOCUMENTS AND PROPOSED PLANS/ACTIONS. ADDITIONALLY, THE MEETING GROUP DID NOT KEEP RECORDINGS OR MEETING MINUTES, WHICH IS ALSO AGAINST THE LAWS FOR WORKING GROUPS ON THIS TYPE OF PROJECT WITH THE MEMBERS IN ATTENDANCE.

* THE FS AND SEVERAL MEMBERS OF THE LOCAL COMMUNITY ACKNOWLEDGE THE HORSES HAVE ALWAYS ROAMED BETWEEN THE TERRITORY AND THE RESERVATION, THE COURTS RULED THE HORSES ARE ONE IN THE SAME, YET THE FS NEGLECTED TO INCLUDE THE MIGRATORY LAND BETWEEN THE TERRITORY AND THE RESERVATION.

* FS DOES NOT HAVE ANY DEFINITIVE INFORMATION ON THE HISTORY OF THE HORSE IN THE AREA. THE CENSUS WAS NOT DONE FOR THE ENTIRE AREA WE CONTEND WAS THE HISTORICAL USE OF THE FOREST BY THE HERD. THE ETHNOGRAPHIC STUDY WAS NOT MEANT TO BE EXHAUSTIVE OR DEFINITIVE, RATHER TO PROVIDE THE DECIDING OFFICIAL WITH VARIOUS PERSPECTIVES OF THE HISTORY OF THE HORSES

* FS CLAIMS THERE IS 500 HORSES IN THE TERRITORY. CAES HAS HAD SEVERAL VOLUNTEERS ON THE GROUND IN THE TERRITORY, DOCUMENTING AND REPORTING ON THE HORSES, INDIVIDUALS, BRANDS BIRTHS AND DEATHS. THESE PEOPLE HAVE BEEN DOCUMENTING THE HERD FOR DECADES AND THEIR COUNT IS CLOSER TO 240 HORSES. FS HAS FAILED TO ACCOUNT FOR THE MANY DEATHS OF HORSES THROUGH DROUGHT, BEING SHOT AND A HEAVY WINTER IN 2019. NOT TO MENTION THE PREDATORS ON THE FOALS. ONLY 20% OF THE FOALS LIVE .

* YOU CLAIM THERE WERE 2 PERIODS OF OCCUPATION 1930-1990 STATING, ACCORDING TO INTERVIEWS OF NON-SCIENTIFIC, NON-TRAINED , DIFFERING MEMORIES OF PERSONS WHO WERE NOT EMPLOYED TO DO THE CENSUS, THAT THERE WERE AROUND 7 HORSES. THIS DOESN[rsquo]T QUALIFY AS A CENSUS. WE DON[rsquo]T KNOW WHAT AREA THEY WERE REFERRING TO OR HOW THEY DID A COUNT, THIS CANNOT BE USED TO BASE ANY DECISION ON. YOU ALSO STATE THAT THEY WERE LIKELY ARMY MOUNTS THAT WERE TURNED OUT, AGAIN THIS STATEMENT IS MADE WITH NO SCIENTIFIC EVIDENCE AND CANNOT BE USED TO MAKE ANY MANAGEMENT DECISIONS.

* YOU CLAIM A SECOND POPULATION DATING FROM 1990 FORWARD APPEARS TO BE A MIXTURE OF HORSES FROM THE FORT APACHE RESERVATION AND OTHER UNIDENTIFIED HORSES WITH NO

SUBSTANTIATED LINK WITH THE ORIGINALLY DESIGNATED HERD. AGAIN, YOU HAVE FAILED TO PROVE EVIDENCE OF THIS STATEMENT. THE COURTS DIFFERED WITH THIS POINT OF VIEW RULING THEY WERE INDISTINGUISHABLE. THEREFORE YOUR OPINION HAS NO BEARING ON THE MANAGEMENT DECISIONS.

* FENCES ON THE EXISTING TERRITORY HAVE BEEN AN ISSUE. LIVESTOCK FENCING CREATED A SITUATION WHERE THE HORSES CANNOT RESIDE EASILY, NOR ROAM FREELY, THIS CHANGING THEIR FREE ROAMING BEHAVIORS, AND THAT MUST BE ADDRESSED.

* LIVESTOCK PERMITTEES MUST FOLLOW GRAZING REGULATIONS IN WHICH THEY ARE NOT BEING FOLLOWED AT THIS TIME. LIVESTOCK MUST NOT IMPEDE THE MOVEMENT OF THE HORSES BUT THEY HAVE.

* FS HAS ADDITIONALLY NOT ADDRESSED ANY OF THE ISSUES OF REPEATED COMPLAINTS OF HORSES BEING CHASED, STOLEN, SHOT, ENTICED THROUGH FEED, SALT OR WATER TO BE IN OR ROADS. UNTIL FS CAN MANAGE THESE BASIC TENETS OF WILD HORSE MANAGEMENT WE FEEL THAT THIS PLAN IS NOT A PLAN TO PROTECT, RATHER A PLAN TO FURTHER HARM OR KILL THE HORSES IN THE HERD.

* THE LAW REQUIRES PUBLIC LANDS TO BE MANAGED FOR MULTIPLE USE, THE WILD FREE ROAMING HORSES AND BURROS ACT REQUIRES THEIR DESIGNATED AREAS TO BE MANAGED PRINCIPALLY FOR HORSES, PRINCIPALLY IS NOT HAPPENING . IN FACT LIVESTOCK IS GETTING THE PRINCIPLE USE.

* YOUR CENSUS SHOWS TO BE INCORRECT. YOU STATE THERE IS BETWEEN 270 TO 420 HORSES. HOW? OUR DOCUMENTED COUNT SHOWS 270 THEN AFTER THE SHOOTINGS OF OVER 30 HORSES AFTER THAT AND BEFORE THIS YEAR, 15 ADDITIONAL SHOOTINGS, ALONG WITH FOALS THAT WERE IN UTERO, AND STOLEN HORSES FROM THE FOREST THERE CANNOT BE 500 HORSES.

* PZP IS NOT NEEDED AND THE FS HAS FAILED TO PROVE THE MEANS OF ANY CONTRACEPTIVE FOR THE HORSES. THE HORSES LIVE IN A BALANCED ECO SYSTEM WITH NATURAL PREDATORS THAT KEEP THEIR NUMBERS DOWN.

* I REQUIRE THE FS TO CONSIDER REASONABLE ALTERNATIVES, INCLUDING

* A VERY CAREFUL CONSIDERATION AND PROOF OF REASONING WHEN EVALUATING AN AML TO MEET THE NEEDS OF THE HEVER WILD HORSES. THE IBLA RULED THAT THE TERM APPROPRIATE MANAGEMENT LEVEL IS SYNONYMOUS WITH RESTORING THE RANGE TO A THRIVING NATURAL ECOLOGICAL BALANCE AND PROTECTING THE RANGE FROM DETERIORATION. THE IBLA CONCLUDED THAT OF THE ACT DOES NOT AUTHORIZE THE REMOVAL OF THE WILD HORSES IN ORDER TO ACHIEVE AN AML

* THE EA/EIS MUST EXAMINE AND INCLUDE ANALYSIS OF RANGELAND EXPANSION/IMPROVMENTS TO ENSURE ADEQUATE FORAGE AND WATER RESOURCES AVAILABLE FOR A VIABLE HERD. PROPER MANAGEMENT PLANS REQUIRE A STRONG INFORMATION BASE, INCLUDING DATA ON THE

* BIOLOGICAL POTENTIAL FOR THE AREA

* NUMBERS AND COMBINATIONS OF HERBIVOROUS ANIMALS THAT CAN BE SAFELY CARRIED ON THE AREA

* KINDS AND AMOUNTS OF FORAGE AND HABITAT REQUIRED BY ANIMALS

* EFFECTS OF HERBIVORES ON VEGETATION AND EACH OTHER

* EFFECTS ON SOIL AND HYDROLOGY

* UNDERSTANDING OF THE ECONOMIC AND SOCIAL VALUES ASSOCIATED WITH THE AREA

THE FORESTRY SERVICE HAS FAILED TO PROVE THE FOLLOWING

1. CENSUS
2. COLLABORATION GROUP DID NOT FOLLOW GUIDELINES
3. NEPA PLAN HAS FAILED TO PROVIDE INFORMATION ON ALL WILD LIFE AND CATTLE. AND THE IMPACT EACH ANIMAL HAS ON THE LAND
4. HAS FAILED TO PROVE THE HORSES TO BE FERAL
5. HAS FAILED TO PROVE THE HORSES CAME OVER FROM THE CHEDISKI RODEO FIRE
6. HAS FAILED TO PROTECT THESE FEDERALLY PROTECTED ANIMALS