

Data Submitted (UTC 11): 3/29/2021 11:00:00 AM

First name: Michele

Last name: Anderson

Organization:

Title:

Comments: Please see attachments.

#### Public Comment Period

The 30 day time frame for public comments is too short due to the complexity of the Heber Wild Horse Territory Management Plan Draft EA and Draft Territory Management Plan and the multiple other pdf files that accompany the plan.

Typically a FOIA request is answered within 20 working days. However, the Forest Service will extend that time frame when they deem it necessary. An example is a FOIA request which I submitted.

On February 6, 2020 I received a confirmation and case number for a FOIA request I had sent in to the Executive Assistant/Forest FOIA Specialist on January 30, 2020.

On February 7, 2020 I received the following email from the Executive Assistant/Forest FOIA Specialist:

[ldquo]Good morning, Michele. Our subject matter experts have started their search for responsive records to your FOIA request. Due to the complexity and possibility of a large volume of records, we anticipate mailing our response to your request on or before Friday, March 27.[rdquo]

It is now March 29, 2021 and at the time that I am submitting this comment I still have not received my requested FOIA information that I need to review in order to address the Heber Wild Horse Territory Management Plan which references the subject matter of my FOIA request. The long overdue FOIA response is impairing my ability to fully participate in the NEPA process.

Due to the complexity, large volume of information in the management draft plan and EA, numerous other pdf files, and the lack of a long overdue FOIA request, I am asking that the comment period be extended.

#### THE WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971

It has been 50 years since the Wild and Free-Roaming Horses and Burros Act of 1971 was passed. In that amount of time the U.S. Forest Service had not developed a Heber Wild Horse Territory management plan. Presently the Forest Service is working towards a management plan in which the main focus appears to be on removing the vast majority of horses. A wild horse territory management plan is not a small task and should not be taken lightly. Nor should it be formulated around a preexisting wild horse removal strategy or a cattle grazing agenda. The inclusion of and deletion of pertinent facts in order to justify a preset outcome should be prohibited. One of the primary objectives in the development of a Wild Horse Territory should be the protection of the wild horses.

#### THE WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971 (PUBLIC LAW 92-195) [sect]1331.

Congressional findings and declaration of policy Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people; and that these horses and burros are fast disappearing from the American scene. It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands.

A holistic approach needs to be taken in the development of such a major management plan. An EA without ever having an EIS is just a shortcut to slamming through the agenda of getting rid of the wild horses in order to appease the public lands cattle operations that have grazing leases in the Sitgreaves.

The Heber Wild Horse Territory management plan requires a complete and comprehensive study, Environmental Impact Statement, instead of just focusing on how the Forest Service intends on capturing and removing federally protected wild horses...America's horses on our land. This land does not belong to the Forest Service or the public lands ranchers. It belongs to every American. The wild free-roaming horses that live in the Sitgreaves do not belong to any individual, group, or government agency, they belong to every American. Yet, the will of the majority appears to matter not when it comes to this beloved herd.

Heber Wild Horse Territory Management Plan, Watershed Report

Excerpt:

[ldquo]Due to anticipated increases in horse populations and lack of management, we anticipate increases in nitrogen, phosphorus, carbon, and ammonia from horses at Territory water sources that are listed in Table 7. Of particular concern in Black Canyon Lake, which is a heavily used recreation site in the territory.[rdquo]

Horses are not often seen at the lake and when they are it is a small band which does not linger throughout the day the way the cattle herds do.

If the condition of the water in Black Canyon Lake is a concern, perhaps it would be a good idea to start with keeping the cattle away from the lake. This is not about a small number of cattle, it is about herds of cattle. Not only do the cattle stand in and defecate and urinate in the actual lake water, they also graze around it which of course further contaminates the lake water due to rain and snow runoff. People go to the lake to fish, picnic, hike, and enjoy nature. However, when cattle are in the area, the need for people to tiptoe around cow diarrhea and while holding their nose due to the horrific stench of the cattle diarrhea and urine makes the experience less than enjoyable. On top of that when the cattle are being driven past the lake by either careless or clueless public lands ranch hands it not only becomes an unhealthy, nasty nuisance it becomes dangerous. People fishing and enjoying the lake have had to literally climb up and between the boulders to get out of the way of the oncoming cattle which also run through the boulders where the people are trying to take refuge.

The quality of the water at Black Canyon Lake and the experience and safety of the lake visitors can be greatly improved by closing that area off to cattle grazing.

The attached photos were captured from a video taken in July of 2019 when visitors and fishermen at Black Canyon Lake had to get out of the way of the cattle that were being driven next to the lake by ranch hands on horseback. The people were not amused by this and felt they were in danger of being knocked down and trampled by the cattle.

Attachment b: Photograph

Attachment g: Photograph

Attachment h: Photograph

Attachment k: Photograph

Attachment o: Photograph

Attachment r: Photograph