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Comments: My name is Kathie Reidhead and I hereby submit the following information for the administrative record in response to the Environmental Assessment for the Heber Wild Horse Territory Draft Management Plan.

I am a hobby photographer that frequents the Apache-Sitgreaves National Forest (ASNF) regularly for the explicit purpose of photographing the Heber wild horses. I have an Instagram page @arizona.wild.horses that features photos and videos daily of the free-roaming wild horses from several herds in Arizona, including the Heber herd from the ASNF.

The lack of oversight and/or management of the Heber wild horses by the U.S. Forest Service over 40+ years, including an accurate census of wild horses in the entire ASNF in 1974 when the Heber Wild Horse Territory (HWHT) was first designated is a disgrace to the process that is now unfolding in 2020-2021.

In 1974, "it was purported there was a population of six mares and one stallion occupying the territory. Throughout the years, no actual scientific data or monitoring was documented on the population. In 1993, the population was purported to be two mares. Due to a lack of understanding in administrative procedures, the Black Mesa Ranger District and Sitgreaves National Forest determined the Heber Wild Horse Territory should be closed and ceased all activities associated with monitoring as well as the development of a management plan"[1] To be clear, the HWHT comprises a mere 19,700 acres of the much larger Black Mesa District of the Apache-Sitgreaves National Forest, a wilderness area of approximately 616,000 acres. The wild horses are free to roam on and off of their designated territory at any time, as no fencing completely surrounds the boundaries of those 19,700 acres to restrict their movement on or off the HWHT (only within their territory, which has restricted migration pathways due to livestock fencing).

In 2005, a U.S. District Court Judge in the District of Arizona, Case No. CV-05-2754-PHX-FJM, cited 36 C.F.R. [sect]222.25 requires the surveillance and protection of wild horses on National Forest lands, other public lands, and lands of other ownership or jurisdiction.[2] Furthermore, in the same ruling, the Judge refuted the Defendant's (U.S. Department of Agriculture (USDA), et al) claim that the horses at issue are domesticated and "strayed onto the Forest after the Rodeo-Chediski fire of 2002".[3] Furthermore, six affidavits by local area residents were signed (under penalty of perjury) attesting to sightings of unbranded "wild horses" over the ASNF throughout the 1970's, 1980's, 1990's and 2000's as part of this referenced legal action (Case No. CV-05-2754-PHX-FJM)[4]. Therefore, the premises upon which the Draft Management Plan were initially formed (citing incorrect information in the Ethnographic Study[5] and Territory History[6]) and used for the original Draft Management Plan (January 2020) are flawed and therefore should be dismissed outright and corrective action taken. It is highly irresponsible to purport falsehoods in 2020 that are known to have been refuted by sworn affidavits in Federal Court as far back as 2005, especially in light of the admission by USDA that no actual scientific data or monitoring of this wild herd had been done for decades prior.

I am further disheartened to see that the Draft Environmental Assessment has disregarded comments from the Draft Management Plan Scoping Process questioning the soundness of reducing the wild herd to only 50-104 horses. Based on the statements of renowned horse geneticist, Dr. Gus Cothran, a wild herd should have around 200 horses for genetic diversity to assure the long term health and well being of that herd. Dr. Cothran has stated, "In other words, to be sustainable over the long term, a healthy herd should have 180-300 individuals." [7] That scientific expert opinion has apparently been ignored and the only actions noted to address such concerns are: "introduce young animals from outside the area to maintain or increase genetic diversity if issues are observed"[8]. Fixing a genetic problem within a herd after it occurs is obviously a fool-hardy and unscientific way of dealing with potentially deadly genetic anomalies. No sound scientific plan would suggest anything of the sort.

Which makes me convinced that this so-called management plan is really a thinly veiled plan to eradicate this herd, first through an unnecessary roundup and secondly via inbreeding anomalies, which are known will occur within such a small population.

The basis for the Draft Management Plan and the Draft Environmental Assessment was to evaluate only the 19,700 acres that comprises the "legal" territory for the Heber wild horse herd. However, it is known and widely acknowledged that very few of the approximately 300 horses that roam the ASNF are found on the HWHT at any given time[9]. The highest number ever recorded on the HWHT surveys (conducted in 2014, 2015 & 2017 by USDA) were 27 horses[10]. That information was provided in the original Draft Management Plan (January 2020) released to the public in February, 2020, but is no longer included in the current Draft Management Plan (March 2021). As a photographer who frequents the Forest, I can confirm that my experience also correlates with very small numbers of horses are found on the HWHT at any given time. They are roaming up to 40 miles away on public lands.

The removal of any wild horses from the ASNF will likely affect the thriving natural ecological balance of the entire Black Mesa District of the ASNF (616,000 acres) where the majority of the wild herd currently roams and the USDA has failed to properly consider that impact on the larger ecosystem in their Draft Environmental Assessment. The only considerations made have been with regard to the 19,700 acres of the HWHT, which the wild horses tend not to use (according to USDA's own data). It is reasonably foreseeable that reducing populations of any wildlife species from their natural habitat will upset the natural ecological balance of those ecosystems. In this case, with the AML being set at a very low number (50-104 horses), it is reasonably foreseeable that such a reduction of wild horses will result in a deterioration of the range health as wild horses are known to contribute to a healthy ecosystem[11].

The USDA has failed to adequately explain in the EA why they dismissed the ideas of expanding the size of the HWHT or increasing the appropriate management level (AML), since BOTH of these suggestions seem viable if drafting an unbiased and legitimate management plan, considering the fact that the wild horses are known to not be utilizing their legal territory much. Furthermore, using only 36 CFR [sect]222.21 (a)(4) as a framework to conduct an analysis to determine the AML while disregarding other pertinent factors is irresponsible and faulty.

The flowchart (Figure 2) on page 6 of the current Heber Wild Horse Territory Draft Management Plan (March 2021) indicates that the majority of the herd will be removed almost immediately, when found not utilizing the territory. What will the implications be to the areas of the Forest they are currently utilizing instead of the HWHT? It is irresponsible and unsound management to develop a "plan" without considering and studying those potential impacts.

The removal of any wild horses from the ASNF will also affect the enjoyment of human visitors to the forest and the USDA has failed to properly consider that impact on the public. The heavy hand of government intervention in "managing" wild horses will be harmful to me personally as I enjoy spending a great deal of my time in the ASNF observing a variety of wild horse families within this herd and sharing those images with the world. Additionally, it is reasonably foreseeable that the Heber-Overgaard Community and the Arizona State Treasury will suffer economic losses due to loss of tourism dollars spent by fellow photographers, nature enthusiasts and the general public who delight in observations of wild horses roaming freely on the public lands. With wild horse numbers drastically reduced in the ASNF, so too will be those opportunities for certain types of tourism dollars.

What is being recommended by the Draft Management Plan and endorsed by Alternative 2 of the Environmental Assessment is NOT humane management, but a means to an end - the eradication of this wild herd, via subversive actions, in violation of the 1971 Wild Free-Roaming Horses & Burros Act. Our Federal Government has already shown callousness in their "management" of wild horses elsewhere in the Western U.S., conducting routine roundups and incarcerations of America's wild horses, costing lives, tearing apart wild horse families and warehousing them in holding pens at great costs to U.S. taxpayers. The Heber herd clearly

does not overpopulate the vast wilderness lands they currently roam (~300 horses on 616,000 acres = 1 horse for every 2,053 acres) and this environmental assessment for the "management plan" is lacking in honesty and scientific rationale supporting the recommendations put forth in Alternative 2 considering the immense size of the public lands wilderness this wild herd currently roams and thrives in. In fact, this environmental assessment allows for 104 horses on 19,700 acres = 1 horse for every 189 acres. It seems obviously flawed and fraught with bias that will likely be easily overturned by a Federal Court action challenging it.

What is being proposed via Alternative 2 of the Environmental Assessment will decimate this herd over the course of time. Therefore, I am urging the USDA to select Alternative 1 - NO ACTION. Let's go back to the drawing board and correct the inaccurate premises and biases that thwarted this process and let's humanely manage this herd at an AML that assures the long-term health and well being of the herd while maintaining a thriving ecological balance of the entire ASNF (not just the HWHT) at the same time. I suggest the USDA follow the sound scientific recommendations put forth in 2013 for humane management of the wild horses and burros by the National Academy of Sciences.[12]

1 - USDA Heber Wild Horse Territory Management Plan, Draft Environmental Assessment, March 2021, Page 1.

2 - See attached file labeled HWHT - D Exhibit 2-c-c (3).pdf, Case No. CV-05-2754-PHX-FJM in the U.S. District Court, District of Arizona, signed by U.S. District Judge Frederick J. Martone on December 13, 2005, page 5, lines 22-24.

3 - See attached file labeled HWHT - D Exhibit 2-cc (3).pdf, Case No. CV-05-2754-PHX-FJM in the U.S. District Court, District of Arizona, signed by U.S. District Judge Frederick J. Martone on December 13, 2005, page 4, lines 3-15.

4 - See Case No. CV-05-2754-PHX-FJM filed in the U.S. District Court, District of Arizona, Exhibit 12 found at this link: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd487560.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd487560.pdf)

5 - Proposed Action, Heber Wild Horse Territory Management Plan, January 2020, Summary of Findings from the ethnographic study (USDA Forest Service 2017), page 7.

6 - Proposed Action, Heber Wild Horse Territory Management Plan, January 2020, Territory History, page 5.

7 - The Wild Horse Dilemma: Conflicts and Controversies of the Atlantic Coast Herds, page 298. Copyright 2015 by Bonnie U. Gruenberg, Quagga Press.

8 - USDA Heber Wild Horse Territory Management Plan, Draft Environmental Assessment, March 2021, Table 2, page 17.

9 - Proposed Action - Heber Wild Horse Territory Management Plan, January 2020, page 8, Table 1 and Table 2.

10 - USDA Heber Wild Horse Territory Management Plan, Draft Environmental Assessment, March 2021, Page 34.

11 - 2015 Study by Wildlife Ecologist Craig C. Downer - Report on Salt River Ecosystem with Focus on Wild Horses. <https://thewildhorseconspiracy.org/2015/12/30/report-on-salt-river-ecosystem-tonto-national-forest-arizona-with-focus-on-wild-horses/>

12 - Using Science to Improve the Wild Horse and Burro Program, A Way Forward, 2013, by the National Academy of Sciences. <https://www.nap.edu/catalog/13511/using-science-to-improve-the-blm-wild-horse-and-burro-program>

Attachment: Exhibit 2