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Comments: Please see the attached Word document for my comments on the EA.

The ongoing trend towards roundups of wild horses in the Western U.S. seems a self-perpetuating plan for the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) contractors and staff. Many people involved are making good money off of these cruel and unnecessary gathers including helicopter contractors, roundup/removal personnel, transportation companies, corral/holding/auction businesses and many other support people involved. This needs to be investigated by the Department of Justice, as it has become a lucrative industry of wild horse elimination on our public lands at great taxpayer expense. The BLM budget is currently \$102.6 million per year for the wild horses and burro program.

The Heber herd appears to be generally healthy and strong and less than 420 total horses by USFS estimates. Private observers (such as myself) would put the number of Heber wild horses closer to 250 or less horses. Quite a discrepancy from [official] estimates and makes one really wonder why? I have been observing them on the Apache-Sitgreaves National Forest (ASNF) for more than four years now. They should be humanely managed on their legally designated territory and the surrounding public lands of the Apache-Sitgreaves National Forest (ASNF), as provided for in the 1971 Wild Free Roaming Horses and Burros Act (WFRHBA):

(PUBLIC LAW 92-195) The Wild Free-Roaming Horses and Burros Act of 1971:

[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.

The entire focus of the Draft Management Plan and the Environmental Assessment has been on the legally designated 19,700 acres of the ASNF, even though the majority of wild horses are known to primarily roam on the adjacent lands of the Black Mesa District (616,000 acres), not the Heber Wild Horse Territory (HWHT). The U.S. Forest Service has long shown their disinterest in managing this wild herd and has even contracted with people over the years to remove the horses in direct violation of the 1971 WFRHBA and contrary to their explicit directive to protect them. In the last 2+ years, at least 29 wild horses have been documented by a USFS investigator as shot to death by an unknown shooter in this Forest. The USFS has failed miserably at protecting this herd as required by the WFRHBA and there is no indication that the Draft Management Plan places their well-being anywhere close to the high priority intended by the 1971 legislation (WFRHBA). The 1971 law was enacted to give priority to the wild horses [where they are presently found] on the public lands. That means whether they are found on the HWHT or on adjacent lands. So this entire exercise [environmentally assessing the HWHT exclusively] has been a complete waste of time and taxpayer dollars. The majority of the herd is not found in large numbers on the designated territory, but on the adjacent ASNF lands.

The hard, cold truth of the matter is that the USFS (under the USDA) appears to be working for the cattle ranchers' interest and not the wild horses, as provided by the 1971 WFRHBA law and directive.

Alternative 1 [ndash] NO ACTION is my vote. The wild horses are far better off where they're currently at roaming the adjacent lands of the ASNF than in an overcrowded and expensive government holding pen, or somewhere unfamiliar and harmful to them [ndash] such as the kill pen auctions, if they are even lucky enough to survive a roundup, and all at GREAT expense to the US taxpayers.

Humane management on-the-range is possible, practical and inexpensive, proven so by the Salt River Wild Horse Management Group (SRWHMG) in the Tonto National Forest of Arizona, co-managed with the Arizona Department of Agriculture and in cooperation with the USFS and the Maricopa County Sheriff[rsquo]s Office. If you want to look for a serious plan to humanely manage the Heber wild horses, look no further than that one.

STOP THE MADNESS!