

Data Submitted (UTC 11): 4/17/2021 6:35:52 PM

First name: Amanda Sue

Last name: Rudisill

Organization:

Title:

Comments: their so called "management" programs for these precious animals.

Specifically, I am writing in regards to the proposed USFS Territory Management Plan for the Heber wild horses, a unique band of horses that reside within the Apache Sitgreaves Forest in northern Arizona. This plan is serving the interests of livestock ranching concerns, not the welfare of the wild horses. It must be reconsidered and changed to protect these horses, which are supposed to be federally protected, not removed from the range by our government agencies, programs paid for by taxpayers.

*The plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. That's one horse for every 394 acres! This range is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory. Extinction is forever.

*With the new lower AML, wild horses are provided just 600 Animal Unit Months while cattle are permitted 5,730 Animal Unit Months to graze within the Territory. Thus, the Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource.

*The last population survey in the Territory found that many of the horses were outside of the Territory boundary. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.

*The plan provides for fertility control to be used to control the population growth rate of the horses in the Territory. The Forest Service must consider how:

o(1) the use of these options will impact the health of the herd when the number of horses is maintained at such a small population.

o(2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.

o(3) IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis. It is ridiculous and outrageously cruel to keep using this archaic birth-control method.

*If removals must occur within the Territory, they should be done exclusively through bait-trapping and over time, to meet adoption demand and ensure that the Forest Service does not add to the thousands of wild horses already in off-range holding facilities across the country. However, if wild horses are allotted their fair share of these public lands and population is controlled by PZP, removals should not be necessary.

*Finally, the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service must work harder to protect these federally protected wild horses from harm and to find the person(s) responsible.