

Data Submitted (UTC 11): 4/19/2021 11:00:00 AM

First name: Betty

Last name: Nixon

Organization:

Title:

Comments: For the Administrative Record, I hereby submit the attached document and photos re riparian areas.

#### Comment re Riparian Areas and Cattle Given Priority

A comparison of the references made to riparian areas between the Heber Wild Horse Territory Plan documents and the Heber Allotment Plan documents (cattle grazing) is absolutely astonishing. Domestic livestock (cattle) are clearly prioritized over wild horses, which, according to the 1971 Act and 36 CFR are to be considered as a natural component of the public lands and are to be managed at a minimal feasible level. The Forest Service clearly views the horses as an invasive species and considers cattle as the natural component of our public lands. It is outrageous and a clear violation of both the letter and the intent of the 1971 Act/law. Cattle are given priority over the very health of the forest.

Clearly, wild horses are to be given priority over domestic cattle:

Throughout the Heber Wild Horse Territory Plan documents, there is reference to damage caused by wild horses. Any perceived damage where horses are considered by biased individuals to be a contributing factor, and horses are to be removed. It's a Queen of Hearts approach to managing our wild horses, it's an "Off with their heads" approach. It's no wonder, since the Forest Service has for decades had the policy of "ridding the range of wild horses". The current Plan is just an extension of that policy.

Since its inception, the Forest Service has catered to cattle growers. As a matter of fact, the Forest Service and cattle growers are one and the same. The individual who held the grazing permit to the Black Canyon Allotment worked for the Forest Service for 33 years. I suspect this same individual played a significant role in delineating what is known today as the Heber Wild Horse Territory and coming up with the original number of 7 horses. No wonder the Territory is so poorly delineated that it is impossible that this was the true "territorial habitat limits" of our wild horses in 1973/74. It was a scheme to get rid of our wild horses and subvert the law. See "Those Days Are Gone Forever" by Bobbie Stephens Hunt, page 71.

If you look at the Heber Allotment Plan documents (cattle grazing), cattle apparently don't cause any damage to riparian areas, and, if anything should arise, the action is to "monitor" the situation. There is no reference at all to removing domestic cattle from our public lands.

Just a couple of excerpts from the HWHT Draft Plan (out of 30 "riparian" references):

Heber Wild Horse Territory Draft Management Plan ([usda.gov](https://www.usda.gov))

Just a few excerpts from the HWHT Draft EA (out of 175 "riparian" references):

Heber Wild Horse Territory Management Plan Draft Environmental Assessment ([usda.gov](https://www.usda.gov))

A few excerpts from the Draft EA for the Heber Allotment Plan:

Heber Allotment Environmental Assessment ([usda.gov](https://www.usda.gov))

Looking at the Heber Wild Horse Territory Draft Plan and associated documents, you would think the Forest Service actually cared about the riparian areas. Instead, they are simply using the riparian areas as another

excuse to rid the range of wild horses.

On June 15, 2020, I notified the Forest Service of a riparian area where the fencing was cut, leaving an opening for large ungulates to enter. It appeared the fence had been cut by a hunter who cut the fence to get to his elk laying inside the riparian area. The opening in the fence led straight to elk bones that were bleached so white they had been there for years, meaning the opening in the fence had been there for years (at least 3 or more). I told Forest Service the fence was down in other areas as well and needed to be repaired. There was also a lot of old cow dung inside the riparian area, further evidence the area had been wide open for a very long time.

Someone did come out and repair the opening cut in the fence, but they left the north and south ends of the riparian area wide open, never bothering to do the needed repairs to protect the riparian area.

I was out at that riparian area again on April 11, 2021. The north and south ends are still wide open, with fresh elk dung and elk tracks inside the riparian area. Once again, I have notified the Forest Service of the problem.

Photos of the riparian area taken by Betty Nixon on April 11, 2021:

Fresh elk tracks lead down to the water in the photo on the right (seen upper left):

South fence laying down. Fresh elk tracks lead over the fence and down to the water's edge inside the riparian area:

South fence broken down and has been this way since at least 2018 that I know of:

Wide open access to the riparian area from the north side:

South end and north end both wide open and have been for years:

Fresh elk dung inside the riparian area 4/11/2021:

Just some examples of the old cow dung inside the riparian area; it's throughout the area: