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Title:

Comments: The following comments are submitted for consideration.

An AML of 50-104 wild horses on 19,700 acres is extremely low and only accounts for one horse per 394 acres. It does not support genetic viability. It only provides 600 Animal Unit Months in contrast to 5,730 Animal Unit Months for cattle grazing in the same Territory. It makes more sense to decrease the livestock use in the Territory to accommodate the wild horses. The Forrest Service should relocate the wild horses that have moved outside the Territory boundary.

I support the use of PZP and the Forrest Service should work with Stake Holders, Animal Welfare Groups and Wild Horses Advocates to assist in monitoring of herds and administration of PZP. There has been great successes with these partnerships in Arizona with the Salt River Wild Horses and in Nevada with the Carson City Wild Horses. Fertility control needs to consider the impact on the health of the herd when use to maintain a small population and should NOT include IUDs that have NOT been proven humane or effective in wild herds. IUDs should be eliminated from consideration.

Removal of herds should be done humanely through;

- * bait trapping only
- * focus on removal of yearlings horses. Younger horses should be removed to meet adoption demand. Younger horses are more adoptable and at less risk to the herd on removal.
- * Older horses, lead mares and stallions should be preserved to ensure survival of herd resource knowledge. Older horses are more stressed, difficult to place and at risk for euthanasia due to non placement. Recommend following protocol used on Montana Pryor herd.

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. Consideration should be given to wildlife camera observation to catch the perpetrator(s) of such horrific acts.

I am submitting an attachment from the Congressional Record dated 2007 entitled Honoring Arizona's Wild Horse submitted by the Honorable Raul Grijalva which captures the importance of these magnificent wild horses to our State of Arizona. The records notes;

The Rim Country wild horses date back to mounts brought by Father Eusebio Kino, who began his 1653 mission to eastern Arizona by setting out from the lands of my constituency in southern Arizona and traveling across our State northeast to the "borders of the lands of the Apacheria which border on New Mexico." These original Spanish horses are the great ancestors of the Mogollon Rim country wild horses. They were the mighty Andalusian war horse, whose origins go back more than 28,000 years to the original Iberian horse; the magnificent Spanish Barb; and the graceful and fluid Spanish Jennet, the mount of many of the great kings of Europe; and the strong bloodlines of these original horses appear almost unchanged in our Rim wild horses 400 years later. Our Arizona Rim wild horses are the direct descendents of the Spanish horses prized by the conquistadors so highly that the foals were carried in hammocks to protect their legs until they were old enough to travel on the forced marches; and prized by the early cattlemen for their endurance and heart and were the very mounts of the U.S. Cavalry as they rode to protect and expand the American west. The Arizona Rim Country wild horses living in Apache-Sitgreaves National Forests are a most precious natural resource to be

preserved for our children and grandchildren who will be able to see them for generations to come.

Attachment: June 6, 2007 Congressional Record pdf