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Comments: The Apache Sitgreaves National Forest Environmental Assessment (or lack thereof) proposes to reduce the herd to only 50 horses. This will, under any scientific analysis, mean that the herd will become inbred and weak. While I suspect that is EXACTLY what the USFS intends as a method to ultimately destroy all wild horse herds, I believe it is unconscionable, unscientific, and in violation of the USFS statutory mission to proceed with the removal of these horses.

I am an environmental lawyer and I am angered that the Heber wild horses are being attacked in such a manner. My specific comments are as follows:

1. The E.A. fails to consider increasing the low AML (Appropriate management level) rather than the easy (but ignorant) removal approach. Indeed, the EA admits that previous public comments primarily were about the AML that was determined by merely counting the available forage in the WHT (Wild Horse Territory) of 19,000 acres even though most of the horses live on 300,000 acres outside of the territory! The claim that the territory is not hospitable is simply absurd since horses are fenced out of large portions of the territory and the horses are doing well - as is the forest - despite the alleged inhospitable acreage.

2. The E.A. fails to adequately analyze the detrimental effects to the Heber wild horse herd if the unsustainable number of 50 horses is achieved, including inbreeding, an inadequate number for protection from elements and predators, and other vulnerabilities that even a person with a K-12 science education could easily point out! I'm concerned that the USFS is no longer hiring scientists, but only trophy hunters and ranchers. Is that the case? Will a lawsuit demonstrate that I am correct?

3. The E.A. fails to consider the option of reducing livestock grazing (i.e., welfare ranching) within the WHT despite the fact there livestock grazing occurs throughout the Apache-Sitgreaves Forest outside of the WHT. Again, I ask: is the USFS no longer consulting with scientists but only working on behalf of trophy hunters and ranchers?

4. The E.A. considers using PZP after removing almost all of the wild horses, the E.A. fails completely to consider humane fertility control as a means to stabilize and reduce the CURRENT herd numbers! That failure to consider PZP as a method for CURRENT herd management is unscientific and belies the probability that the USFS is doing the bidding of trophy hunters and welfare ranchers.

5. The E.A. considers a number of inhumane and absurd methods of birth control (e.g., gonacon, iud's, and sex ratio scewing), but these should be dropped immediately from consideration since they do not preserve natural herd behavior and only serve to demonstrate - once again - that USFS is not consulting with scientists!

6. These are OUR PUBLIC LANDS and the majority of the population of the U.S. wants wild horses to be on OUR PUBLIC LANDS. The majority of the population of the U.S. does NOT want welfare ranching in our forests. USFS serves the PUBLIC interest, not the interests of trophy hunters and welfare ranchers.

I care deeply about the Heber wild horses and USFS works for me and other like-minded people. The Heber wild horses MUST be preserved and humanely and scientifically managed through PZP fertility control measures. The bottom line: DO NOT REMOVE THE WILD HORSES!

Attachment: Moving Forward: A Unified Statement on the Humane, Sustainable, and Cost-Effective On-Range Management of America's Wild Horses and Burros