Data Submitted (UTC 11): 4/22/2021 11:00:00 AM
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Title:
Comments: Submission 1, part 2

USDA FS's ANSWER to this public comment just above, is just below (and appears to be further unequal protection under the l aw) if we are not going to put out water for wild horses when needed,

"An economics analysis will be performed as part of the proposed action to determine the costs of the proposed improvements. A combination of funds including grants and contributions from federal, state, and private entities including the permittee may be used to pay for these improvements and are obtained nearer to implementation of the improvements." emphasis added.

Another Proposal by the USDA FS:

INSTALLATION OF CATTLE GAURDS - Rather than GATEs and LABELS so wild horses can move?! This needs clarification or CAES et al. or we cannot agree.

"Installation of cattleguards will help control livestock use by reducing the problem of gates l eft open by recreational users and others." Installation of cattleguards and moving an existing cattleguard are being analyzed under Alternative 2, the proposed action. This will alleviate some of the problems associated with gates being left open by other Forest users.

This project gets an Environmental Impact Statement but not the Wild Horses after 50 yrs and much false information?! They should BOTH!

4FRI Rim Country Project Environmental Impact Statement:

The desired condition from implementation of the Rim Country Project i s to improve forest health and develop a forest structure that i s resilient to natural elements including disease, fire, and insects, and climate change.

Another:

PINON JUNIPER "TREATMENTS"

"Areas where pinyon-juniper was reduced or eliminated by the fire should be managed to maintain a grassland aspect on appropriate soils and levels of tree cover compatible with good watershed conditions on those soils Maintenance and thinning within the Pinyon Juniper and grassland areas i s proposed along with maintenance burning in the treated areas.

This flies in the face of science.

OTHER AGENCIES and INDIVIDUALS CONSULTED

Everyone is included i t seems, except, CAES, WHOA, WHOA-Voters and consultant Theresa Barbour or CAES et. al. who specifically requested to be notified of any movement on the management plan development.

Additionally it was mentioned that tribes were consulted however communication was difficult due to covid and the tribes did not respond. This plan has been 50 years i n the making there is no acceptable reason not to have

input from the tribe, especially the White Mountain Apache who has utilized these horses throughout history.

ADAPTIVE MANAGEMENT MEASURES ON HORSES

While there are measures for monitoring watershed, i n this NEPA process etc. There is little in this plan for the measurement of wild horses though this is a Plan for Wild Horses. The following measure are suggested:

? Population Management Measures: See NEW MEASURE 1) Below

? Genetics

? Attrition Rate

? Foal Mortality

? Predator Rate

? Counting Method

? Water Monitor

? Removal Rate Versus AML called MM (Feasibility and Humanity)

? Transparency - Hidden Agendas and Propaganda Monitor

? Climate Change - actively monitored for every project with associated cost analysis.

IMPORTANTLY- We NEED A Measure of Removals versus AML

1) M ANAGEMENT MEASURE (MM): As managers of wildlife we are concerned with not just having a specific number such as AML. We need to have a SIMPLE MEASURE of our success for feasibility and humanity which tells all at a glance.

Over a 10 yr period, I recommend the following measure:

MM = No. of Removals divided by the mid AML range. => Removals/AML

Management Goal would be well under one (1) This addresses both feasibility & humane issues.

GOAL: MM less than 1.

Once at AML and maintain PZP darting at about 80% mares/yr. per WHOA population modelling. We can easily keep this MM no. at 1 or under.

For example:

NOT Feasible

Removing 1000 wild horses i n 10 years with a median AML of 100 Management Measure or MM = 10

Feasible & Humane

Removing 100 wild horses i n 10 years would then be an MM of 1

2) COUNTING METHOD IS NEEDED : Alternative Feasible and Transparent Real Time COUNTING Method

The counts of the HEBER Wild Horses are not updated and does not take into account the shootings and removed horses:

Page 36 Excerpt Using Science to Improve the BLM Wild Horse and Burro

Program: A Way Forward (2013)

(Pre-Gather and Post-Gather Counts. )

"All the methods except removals or captures can be conducted from the ground or from the air. In ground-based surveys, observers might traverse transects on foot, in vehicles, on horseback, or a combination of the three. G round-based observers may be in prepositioned, stationary blinds to count animals with the mark-resight or double-observation methods. Cameras can be used to photograph animals at places of common congregation, such as watering holes (Cao et al., 2012; Petersen et al., 2012), and animals can be identified in a series of photographs over time by their markings; this procedure is typically used in a mark-resight analytical framework."

Stacy Sanchez uses this method and has the most accurate and updated count with pictures: He states there are approximately only 420 horses now, though this is the estimated count of the Forest Service for 2017. This has not increased since then i f that was a correct count. This makes sense since normal attrition is 10% per the NAS and subtracting the wild horses who were shot i s another 10%.

Stacy also states that after the last Helicopter flew over to count Heber wild horses, a foal was found with i t's hoof missing[hellip].. Counts by helicopter NOT should not be done during peak foaling season.

CHEAP and EASY : Good project for collaboration.

3) WATER v 6th mass Extinction in the U.S. Much is made of public lands ranching sharing water with wildlife. However, given that this water i s not sustained year round and there are many "pasture" fences and gates, this annual effective removal of water can then become an annual die off for wildlife including horses.

Water should be ensured i n each fenced area year round and gates labelled so that tourists know when gates should be open and when they should be closed.

Fencing should be partially removed as well i n certain areas when cattle are off.

4) CLIMATE CHANGE per the l and use plan i s passively monitored once every 5 years. However, climate change should be actively reduced by monitoring Albedo of the forest, carbon uptake of the forest, carbon output of the manure from cattle/ruminants.

ALL projects regarding forage, watershed etc. should also be measured for i t's impact on these climate change measures of carbon footprint and albedo.

These measures should be utilized in every cost analysis as well.

Moreover water and forage cannot be utilized to manage wild horse population as per the 1971 Act, and also as shown i n the National Academy of Sciences Report. This is a well known method and has been utilized illegally

by rouge agencies even since the 1971 Act. Alternative 1 gives illegal and improper guidance on water. Alternative 2 is little better.

Wild horses do not cause climate change, however cattle do, and wild horses cannot be penalized for a reduction i n snow melt which puts all water into the hands of people rather than wildlife versus perennial streams fed by snow melt.https://www.blm.gov/policy/im-2015-151

TIERING - meaning moving forward without re-inventing the wheel.

This EA could have tiered with the Carson National Forest which has utilized Peak Facilitization and the writer for approximately 1.5 years to move forward i n a Win Win Win fashion. That means Public Lands Ranchers, Horses, Advocates/Environmentalists.

Unfortunately, this EA process has cost the tax payers, the horses, the public lands ranchers providing little more than a non-transparent justification to continue the wipe out of these protected wild horses.

GATHERS h ttps://www.blm.gov/policy/im-2015-151 The BLM's use of Helicopters for gathering horses i s entirely illegal and insufficient with respect to l egal and humane treatment of a wild horse.

In addition, the BLM has not even taken the insufficient advice of the two veterinarian teams that gave input. The independent veterinarians stated that cameras/video should be used during round ups. This i s not done and none of these vets were even allowed to sit i n a helicopter during a round up.

They did fly over Horse Territories not during a round up and noted dead horses on the grounds which seemed to be dead due to l ack of water Cattle Gone Water Off issues which have been illegally and inhumanely used to manage wild horses i n pastures through time by leaving gates closed when ranchers stop hauling water etc.

While the Secretaries of the Department of Interior and the USDA Forest Service CAN utilize motorized equipment, they CANNOT utilize i t inhumanely.

Moreover the Lacey Act also applies and these wild horses cannot be moved inhumanely in any case.

SEE Three affidavits by Dr. Lester Friedlander DVM

FERTILITY CONTROL REQUIREMENTS - Humane and Genetically Responsible.

? Any fertility control that cannot be done by individual or family band ON THE RANGE is inhumane and unfeasible.

? Any fertility control that permanently sterilizes after less than 5 darts i s unacceptable.

? Any fertility control that i s surgical i s inhumane. This includes any type of spay.

? Any fertility control that requires the equine to be knocked out or put under i s inhumane and not feasible.

? Any fertility control uses must have a PUBLIC COST Analysis and PUBLIC NEPA Process.

? Any fertility control that does not wear off within 3 yrs i s too dangerous genetically as wild horses can be easily double darted and can easily end up sterilized. Conversely with Zona Stat H, an older mare receiving her 5th dart i n as many years my become sterilized

As long as there are known feasible on range methods that meet these conditions, there is no reason to be experimenting on these sentient beings and their families. Hitler thought that was okay too. It is not. That includes useless collar experiments which are never published and risk the lives of the sentient being. There are game cams drones with IR and Satellite and now Iris recognition.

The cattle are over utilizing the natural waters here at Heber.

However:

https://youtu.be/jbEQWuPiqU8 T his grazing allotment at this link leaves the water on year round for the wildlife. Horseshoe Allotment Both BLM and USDA FS.

On page 3 of the Heber Wild Horse Territory Proposed Appropriate Management Level Determination

It is stated that a wild horse needs 9,490 lbs of forage per week. This is incorrect.

A wild horse weighs approximately 600 - 700 l bs. They need 1 to 2% of their weight per day. At 1.5% that would be 10.5lbs/day and 3832.50 l bs per year.

On page 22 "W hile the data are collected t o help with livestock management, there is no distinction between cattle, horse, or wildlife use. Utilization levels for both allotments, 2007 to 2018, are displayed i n table 12. The utilization monitoring data indicate the allowable use guidelines have not been exceeded within the territory over the past several years.

On page 23 "These l ow utilization levels indicate that the use of the territory, by all grazing animals, over the past ten years has been within the forage-producing capability of the area."

On page 26 "Cover and Space" section, in about 1 out of 20 winters, seasonal snow can accumulate to levels of 30 inches or more. In such years, horses would not have access to the forage, thus rendering i t unavailable."

On page 26 bottom "According to the Western Regional Climate Center (2015), i n about 1 out of 20 winters, snowfall accumulates to l evels of 30 i nches or more, which l ikely would cause horses to migrate to areas of lower elevation in order to survive. "

SEE LETTER SUBMISSION: Figure 9. Heber Wild Horse Territory and grazing allotments

SEE LETTER SUBMISSION: Figure 10: Broad overview of terrain

Did not show water i n the other areas where the horses are per the USDA FS own surveys.

SEE LETTER SUBMISSION: Figure 8. Water sources within the Heber Wild Horse Territory

SEE LETTER SUBMISSION: Figure 6. Flight pattern and survey coverage, 2017 survey.

"When the territory was established, the northern portion was identified as winter range; this is the lowest (6,700 to 7,000 feet) elevation and consequently the warmest part of the territory. Canopy cover i s often used to determine thermal cover for wildlife, but when considering the need of cover for horses, consideration beyond canopy cover must be incorporated. Horses use tall brush to retain heat i n the winter and trees to provide shade i n the summer; they will also utilize the topography for shelter from wind. Figure 10 shows a broad overview of the terrain of the area. Areas of lower elevation are shaded green while the areas with the highest elevation are whitish. The Western Regional Climate Center (2014) indicates the prevailing winds i n the area are generally out

of the southeast i n the winter and out of the southwest i n the summer. As displayed i n figure 10, the flatter terrain to the northeast offers lower elevation (and therefore less snow accumulation), while the canyons to the south of the territory offer more shelter from the wind than the area within the territory."

CLEARLY, the wild horses also utilize this area between the Rim and the "territory.

SEE LETTER SUBMISSION: Text and Figure 13. Seasonal movement of large ungulates in the project area, in relation to the territory.

There is no map of the Shootings in this timeframe.

There is no map of the round ups of "Trespass horses"

Are the two allotments with almost no horses the allotments and this i s the supposed wild Horse Territory? The forage monitoring i s not relevant because the horses are not there and i t i s the wrong area.

SEE LETTER SUBMISSION: Figure 14. Overview of fences and recorded observations of horses during February 2015 and April 2017.

"Determination of Cover and Space Sufficiency The above discussion indicates the horses have not been and are not consistently utilizing all the delineated territory. Based on aerial surveys and on-the-ground observation, horses are primarily using the southern portion of the territory during the spring, summer, fall, and mild winters. There i s an assumption the horses may move to areas of lower elevation outside the territory or off the Mogollon Rim during severe winters following the behavioral patterns observed with the wildlife, but monitoring data specific to horse use patterns i s lacking. As noted i n the Bureau of Land Management Wild Horse and Burro Handbook (USDI Bureau of Land Management 2010), a recurring pattern of movement out of a territory to access forage, water, or thermal or hiding cover i s an indication the territory cannot sustain year-long horse use. However, there appears to be sufficient forage, water, and cover available within the territory. It appears the fences within the territory are likely limiting movement to the lower elevations in the north; while snow accumulation i n parts of the territory effectively push large ungulates to lower elevations during severe weather. While these observations indicate the cover and space may be insufficient i n the territory, w e cannot ascertain with certainty why wild free-roaming horses are moving off the territory. Additional monitoring i s needed to better understand how horses are using the territory."

ANSWER: The USDA FS i s not protecting or studying these wild horses under the rule of law.

SEE LETTER SUBMISSION: EMS TRASNMISSION 6/28/2013 - Instruction Memorandum No. 2013-146. Expires 9/30/2014

SEE LETTER SUBMISSION: Photograph of a horse

Page 32: The tier 1 analysis determined the four essential habitat components are sufficient (with some l imitations) and the area is capable of supporting free-roaming horses

From Heber Wild Horse Territory Management Plan, Population Modeling At https://www.fs.usda.gov/nfs/11558/www/nepa/33054_FSPLT3_5599184.pdf

SEE LETTER SUBMISSION: Page 11

"The distribution of outcomes summary states i n 21 years and 100 trials, the lowest number of 0 to 20-plus year-old horses ever obtained was 27 and the highest was 1,303. The average population size across 21 years

ranged from 180 to 289. The medians for the average, minimum and maximum populations are 224, 58, and 926, respectively. The average growth rate for the median trial i s 4.9 percent. The median trial includes the removal of 848 horses, with 321 mares treated with contraceptives."" It must be noted that this scenario i s not likely to occur under the proposed action-for instance, the model assumes gathers would be ongoing to administer contraceptives to 8 0 percent of the mares over one year old, no matter the population level. The adaptive management component of the proposed action would allow for management actions to occur based on monitoring results, so contraceptives would be administered only as needed to maintain the population within the appropriate management level."

CAES et al. QUESTIONS/ISSUES include:

1. Contraceptives need to be administered proactively to avoid round ups.

2. We should monitor how many foals are taken by the wolves, bears and Mountain Lions and the anti-rule of law Militia.

3. It does not sound like the wild horses will be darted ON THE RANGE

4. "Primarily Bait and trap methods" means there are s ome Helicopter Round-ups.

5. Round ups are expensive and there i s no cost analysis.

6. In this scenario the deaths from shooting have not been accounted for.

7. There is no discussion as to where the horses would be darted

8. There is no cost analysis

9. There is no genetic analysis

10. No humanitarian analysis

11. No wild horse lives out i t's life on the "Wild Horse Territory"

12. Wild horses are managed as l ivestock and this i s a puppy mill feeding a meat market.

13. This has a huge cultural and economic i mpact.

14. No mention of taking a year off to ensure the horses are not sterilized i n the 5th year.

15. Is this native PZP registered as Zona Stat H, PZP 22, or i s i t Gonacon, SpayVac or IUD?

SEE LETTER SUBMISSION: Attachment 1 - HEBER Wild HORSE HISTORY