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First name: Annie

Last name: Malone

Organization:

Title:

Comments: I oppose the plan to reduce the number of Heber wild horses to 50-104. In addition to making the herd genetically unviable, the plan uses more of our public resources for private profit. The Forest Service entered into a Stipulation Agreement filed on March 2, 2007, agreeing that wild horses are by law an integral part and component of the natural system of the public lands, as expressed by Congress. Since this area is designated principally for horses, they should be considered the principal users of the land. Adjustments should be made to reduce cattle grazing and allot the horses their fair share of forage. To do otherwise is to violate the intent of Congress.

The majority of grazing permits in the Territory are issued to the Seibert Cattle Company, LLC. Although registered in Nevada, it is a foreign owned corporation. Our taxes maintain the Territory and subsidize below-market grazing rates and infrastructure for the benefits of the Seibert Company. We should not be subsidizing wealthy corporations, especially those that are not even US owned.

It is particularly disturbing to me that assumptions and speculations about wild horse behavior are used throughout the AML Assessment to justify the proposed Management Plan to reduce horse populations. Action should be based on facts and documented studies, not assumptions. It is clear that proper studies were not conducted prior to establishing the AML, and therefore, this document is flawed and unreliable. Here are just a few examples:

[ldquo]Large ungulates are known to migrate off the Mogollon Rim in the winter to the canyons located to the south... but there is a lack of monitoring data to support or dispute this assumption.[rdquo]

There is an assumption the horses may move to areas of lower elevation outside the territory or off the Mogollon Rim during severe winters... but monitoring data specific to horse use patterns is lacking.

... we cannot ascertain with certainty why wild free-roaming horses are moving off the territory.

You state that [ldquo]Not all scoping comments are relevant to the decision. Comments are not relevant if they are: ...conjectural in nature or not supported by scientific evidence....[rdquo] Yet, your report contains assumptions. Should you not be held to the same standard as the public? Here are two examples:

Page 111 - [ldquo]A no-action alternative could result in the stasis of the population at current levels, or an increase. While no cases of damage are known, the direct effects to cultural resources could be continued damage or degradation of cultural resource sites by an excessive or unmanageable horse population. [ldquo]

Page 112- [ldquo] Beaver (2008) determined that the reduction in ground and shrub cover is due to effects from trampling and traffic, not necessarily grazing. While studies have not been conducted into the effects of the horse population directly in project area, it can be assumed.[rdquo]

Action should be based on facts and documented studies, not assumptions. Even more egregiously, false statements are attributed to horses. You state that horses do not roam and [hellip]"tend to use small portions of habitat available to them and habitually congregate in limited localities. They do not appear to explore or exploit new areas, even if new areas are available to them.[rdquo] This contradicts your own description of horses as free- roaming and moving off the territory. Wild horses often roam 10-20 miles a day (unless fences constrict them), while cattle tend to congregate around water sources and, according to Oregon State University, ... [ldquo]impact grass growth and regrowth by trampling, fouling, selecting or rejecting certain plants and pugging

the soil[rdquo].

However, the negative impacts of cattle do not seem to matter, as noted below:

Page 113 - Livestock grazing: As noted above, livestock grazing has occurred aggressively across the landscape, and since the late 19th century. The overall loss of ground cover and repeat exposure of cultural materials to erosion, compaction, displacement, and damage compromises the integrity of artifacts and sites, as well as the future research potential of a site.

Here we have the facts. Cattle have damaged artifacts and sites yet the solution is to remove horses and expand the number of cattle

Regarding principle use of the Territory, you state: [ldquo]Livestock grazing was authorized in this area before it was identified as a territory and cannot be arbitrarily dismissed. When the Heber Wild Horse Territory was established, it overlaid portions of the already well-established Black Canyon and Heber grazing allotments. However, the horse Territory is owned by and funded by the public. All improvements that benefit grazing come from public funds. Furthermore, the law states that [ldquo]the creation of a grazing district or the issuance of a [grazing] permit . . . shall not create any right, title, interest, or estate in or to the lands.[rdquo] 43 U.S.C. [sect] 315b. Cattle already graze on over half of the wild horse Territory and diminish the resources that the horses are legally entitled to. Horse grazing in the Territory is a legal right, not a privilege. Livestock grazing on public land is a privilege, not a right.

Publicly funded endeavors should benefit large numbers of people, not a small group of mostly wealthy ranchers or corporations. Visitor use for the Apache-Sitgreaves National Forests as a whole was estimated at 830,000 in 2018 (National Visitor Monitoring data). The labor (direct and secondary) for livestock grazing was only \$23,259 in 2017. Tourism benefits whole communities and can function in an environmentally sustainable way. Unfortunately, this plan does not propose actions that are beneficial to the environment or cost effective for the citizens who foot the bills. Instead of promoting the most unique aspect of this area [ndash] the wild horses, this plan is aimed at their demise. Consider the following:

Historic newspaper Library of Congress:

The Holbrook Argus, Holbrook Arizona, Navajo County, Tuesday October 1, 1907:

[ldquo]Red Holcom and Charlie Osborn who are engaged in capturing wild horses above Heber, were Holbrook visitors for several days last week. They report fair success in this rather novel enterprise.[rdquo]

This proves that the Heber wild horses did not originate from ranch stock. Why not use this to entice more tourists to the region? Unfortunately, the Forest Service seems to lack the vision to understand the potential of unspoiled places and is not practicing good stewardship of the lands we have entrusted to your care. Here are a few posts from your website to illustrate an opportunity squandered:

The Apache-Sitgreaves National Forests has the potential to be absolutely amazing! But it doesn't seem to be managed very well and that's why I cannot recommend visiting it. Quads and other off-road vehicles ripping up the forest and nothing is done. Federally protected wild horses shot and nothing is done. Rapid fire gunshot frequently heard and people being seen shooting indiscriminately and nothing is done. Cattle all over the place as if it were a private ranch. Barbed wire tossed aside endangering wildlife and people.

After years of camping all around Arizona, I am incredibly disappointed that law enforcement and the Forest

Service feel that it is acceptable for careless people to be firing guns in populated places. Even in very remote areas, it is hard to go a day without hearing rapid fire gun shots at all hours of the day and night and it is extremely unnerving.

The shooting of multiple horses and disregard for other's lives should not be ignored. Also, this lax attitude will end up pushing regular campers out of the forest. Please shoot safely.

These posts show the lack of care and respect that the USFS has for this region. It appears that everything is done for private interests such as the timber and livestock industries. Ranching used to be a symbol of self-sufficiency. Ranchers used lands they owned. Now our public lands are turned into feedlots for the wealthy. Using public lands and resources for the livestock industry is unfair to citizens who foot the bills but have little input in the management of these finite natural resources. With 28 million acres available for grazing in Arizona, 9,000 acres can be reserved for the horses that are integral in maintaining the biodiversity of the region.

You have a responsibility to all citizens to protect and maintain our natural resources that are an irreplaceable part of our heritage. I expect you to honor that by:

1. creating a Heber Wild Horse Sanctuary, removing all livestock from the Territory and increasing the AML to 150-200 horses for genetic viability
2. Preserving natural behaviors by using only PZP, if necessary, and maintaining family groups
3. Removing fencing to allowing horses to roam and access water
4. Using citizen partnerships to administer fertility control
5. Redrawing the Territory boundary to reflect historic wild horse usage and including all source documents in the Management Plan appendix.