Data Submitted (UTC 11): 4/4/2021 11:00:00 AM
First name: Betty
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Organization:
Title:
Comments: For the Administrative Record, I am submitting the attached comment re: cattle being given priority over wild free-roaming horses in the Heber Wild Horse Territory, a violation of the 1971 Wild and Free-Roaming Horses and Burros Act. The Territory "by law" is "devoted principally" to the welfare of the horses.

Comment re: Cattle Being Given Priority Over Wild Horses

The 1971 Wild and Free-Roaming Horses and Burros Act under 1332 Definitions states, [ldquo]range[rdquo] means the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands[rdquo]. In short, the Heber Wild Horse Territory is [ldquo]by law[rdquo] to be [ldquo]devoted principally[rdquo] to the welfare of the horses. However, throughout the Draft Heber Wild Horse Territory Management Plan and its associated documents, it is stated and reiterated numerous times that horses will be removed if they are considered to be a determining factor in any downward trend in the forest.

In contrast, a review of ALL documents associated with the Heber Allotment Management Plan revealed only ONE reference to damage caused by cattle. In that reference, there was NO mention of removing any cattle. The Forest Service says they will merely [ldquo]explore proper measures or management actions[rdquo].

The question remains as to whether there even exists a Black Canyon Allotment Management Plan. A FOIA request to the Forest Service resulted in nothing found.

Forest Service is clearly giving cattle priority over horses within the Heber Wild Horse Territory, a violation of the 1971 Wild and Free-Roaming Horses and Burros Act.

Definition of [ldquo]principally[rdquo]: in attachment

And[hellip]

Define principally. principally synonyms, principally pronunciation, principally translation, English dictionary definition of principally. adj. 1. First or highest in rank or importance.

Here is the one and only reference in the Heber Allotment Management Plan to any action to be taken if livestock grazing contributes to a downward trend:

TEAMS Specialist Report Template 2013 (usda.gov): Excerpt of soils report in attachment

Forest Service refers to damage caused by livestock grazing:

Heber Wild Horse Territory Management Plan Draft Environmental Assessment (usda.gov) text in attachment

Below are the numerous references and reiterations made within the Draft Heber Wild Horse Territory Management Plan and its associated documents to removing horses, with no reference anywhere to removing cattle if they are a contributing factor:

Heber Wild Horse Territory Proposed Appropriate Management Level Determination (usda.gov) text in

attachment

Heber Wild Horse Territory Draft Management Plan (usda.gov) population control text in attachment

Thresholds text in attachment

Appendix 4 Monitoring plan in attachment

Heber Wild Horse Territory Management Plan Draft Environmental Assessment (usda.gov)