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 hereby entering this comment re: alleged "non-traditional" coloration patterns in the Heber herd.

Comment re: What has been described as [ldquo]non-traditional[rdquo] coloration patterns

The Draft Plan and the Draft EA reference looking for [ldquo]indicators[rdquo] such as non-traditional coloration patterns (paints, appaloosas, whites, etc.). There is no indication of what the [ldquo]etc.[rdquo] is, and there is no indication of, or support for, how these coloration patterns were determined to be [ldquo]non-traditional[rdquo] within the Heber herd.

Having devoted over 3,000 hours towards the observation and documentation of the Heber herd over a 2+ year period, I would agree, I have never seen an appaloosa in the Heber herd. [ldquo]White[rdquo] horses, however, are abundant and quite common in the Heber herd. We have Cremellos and Perlinos. There is also historical support for white wild horses in the area. See the below wild horse article in the Holbrook news from October 14, 1910, wherein it states, [ldquo]Some of the animals are extremely beautiful, especially one or two stallions, which are pure milk-white.[rdquo]

The Heber herd also has [ldquo]paints[rdquo], and there is photographic evidence that they were born into the Heber herd. One of our paint stallions, [ldquo]Mix-up[rdquo], was shot and killed in January 2019. Another paint stallion [ldquo]Patch[rdquo] and his paint filly [ldquo]Belle[rdquo] were shot and killed in January 2020. One of the surviving mares in Midnight[rsquo]s band is a paint. Midnight was shot and killed January 7, 2021. We also have other paints born into the Heber herd.

There is no scientific or historical basis for targeting [ldquo]white[rdquo] and [ldquo]paint[rdquo] horses for special identification as have [ldquo]non-traditional[rdquo] coloration.

Heber Wild Horse Territory Draft Management Plan (usda.gov) states, [ldquo]Horse population monitoring will occur through various techniques. The Forest Service will conduct aerial surveys every 2 to 5 years as funding allows. Aerial surveys will use the double observer technique, which is the scientifically accepted method for conducting these types of surveys (see Appendix 4: Monitoring Plan). Continual monitoring of the horse population will be accomplished in collaboration with local volunteer groups, university students, ranchers and other forest visitors, and citizen science projects to monitor horses and their use of the territory. The Apache-Sitgreaves Wild Horse and Burro Coordinator will develop protocols for reporting of horse data by any non-Forest Service group will maintain a database of horses which populate the territory. Volunteer groups will be standardized on the data they collect and report to the Forest Service. Observations will include indicators such as non-traditional coloration patterns (such as paints, appaloosas, whites, etc.). Physical characteristics such as clubfoot or other congenital body deformations must be documented. When necessary, animals will be introduced to the herd to help broaden the genetic diversity of the herd.

Heber Wild Horse Territory Management Plan Draft Environmental Assessment (usda.gov) states, [ldquo]programs to monitor horses and their use of the territory. The Apache-Sitgreaves Wild Horse and Burro Coordinator would develop protocols for reporting of horse data by any non-Forest Service group and would maintain a database of horses that populate the territory. Volunteer groups would be standardized on the data they collect and report to the Forest Service. Observations would include indicators such as non-traditional coloration patters (paint, appaloosas, whites, etc.). Physical characteristics such as clubfoot or other congenital body deformations must be documented. When necessary, animals would be introduced to the herd to help

broaden the genetic diversity of the herd.[rdquo]

Image in attachment: The Holbrook news from October 14, 1910: [ldquo]200 Wild Horses Ranging at Foot of Mogollan Mountains[rdquo]

Attachment: Photograph of Mix-up (born into the Heber herd):

Attachment: Photograph of [ldquo]Patch[rdquo] (born into the Heber herd):

Attachment: Photograph of [ldquo]Belle[rdquo](born into the Heber Herd - [ldquo]Patch[rdquo] is the sire):

Attachment: Photograph of Midnight[rsquo]s mare [ldquo]Maize[rdquo] (born into the Heber herd):