Data Submitted (UTC 11): 4/22/2021 11:00:00 AM
First name: Janet
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Organization:
Title:
Comments: To: Anthony Madrid, Forest Supervisor

Re: Hebert Wild Horse Territory Plan

Date: 22 April 2021

Dear Supervisor Madrid and Colleagues,

I am writing today to protest, in the very strongest terms possible, the USFS proposal to drastically reduce the already dangerously low numbers of wild horses in the Apache-Sitgreaves National Forest in Arizona to one-fifth or less of its current small size.

The proposed action would drastically reduce the already perilously low population of approximately 500 individuals in this Wild Horse Territory to between 50 and 104 individuals, which is well below the bare minimum required for genetically viable population stability. The proposed action makes no sense, as the current population is already very small, well adapted to the Territory, and has a minimal environmental impact on the local environment. Even at the high proposed AML, the proposed plan, if carried out would result in an unsustainably low population density of approximately one just horse per 400 acres of the Territory.

The Hebert horses are already endangered and urgently need protection, not further harassment. The proposed action comes in the wake of a spate of illegal killings of the Hebert horses in and around the Territory. Twelve animals were shot and killed in January of 2020 alone, yet the Forest Service has to date made no serious attempt to investigate these crimes or to bring those responsible to justice. Perhaps this is not surprising, since the Forest Service has been fighting in the courts to eliminate this herd since 2005, but the failure is nonetheless inexcusable, especially in view of the fact that efforts to zero out the herd have been blocked in federal court. The Forest Service is responsible for the welfare of these animals, as well as for the environmentally responsible management of the Territory and the National Forest.

Unfortunately, proposals to drastically reduce this population of wild horses will help neither the horses nor the environment of the Forest - quite the opposite. The Forest Service proposes allotting just 600 animal unit months (AUM) at the low proposed AML of just 50 horses, yet at the same time the Forest Service continues to allow 5,730 Animal Unit Months to graze within the Territory. This is unsustainable, and the Forest Service cannot fulfill its mandate of sustainably managing this territory by allowing such high levels of livestock grazing.

Forage-hungry, water-guzzling cattle are ill-suited to the Apache-Sitgreaves National Forest at the levels allowed by the Forest Service. This is not to say that commercial livestock grazing should not be allowed at all, but it certainly must be limited to environmentally sustainable levels. Unlike equines, which evolved in the semi-arid environment of the western plains, domestic cattle descend from stock adapted to rich grasslands with relatively high annual rainfall amounts, such as are found in Europe or in the east of this country, and their forage and water requirements reflect this lineage, making them poorly suited to the semi-arid lands of the Apache-Sitgreaves National Forest. Additionally, ruminant cattle, having only a lower set of teeth, tear up rather than forage grasses, resulting in greater damage to native vegetation than equines, which use incisors to clip grasses. Cattle also tend to congregate in riparian areas and trample fragile riparian vegetation more than do equines. Thus the per-head negative environmental impact of cattle is greater than that of wild horses, and this negative environmental impact is greatly exacerbated when livestock grazing in the Territory is permitted at the high levels envisioned in the instant plan.

To manage this area in an environmentally responsible manner and to comply with both court rulings and statutory law, the Forest Service must therefore reduce forage allocations for livestock to more sustainable levels, while concomitantly raising forage allocations for wild equines to allow maintenance of the current modest population of approximately 500 individuals. The result of such a redistribution of forage allocations to more sustainable and equitable levels with be a healthier national forest, healthier wild horses, and indeed healthier livestock and rangelands.

To sustainably manage the current modest wild horse population to maintain approximately 500 individuals, the Forest Service should implement a program of regular PZP (porcine zona pellucida) immunocontraceptive vaccine on this herd. As you are surely aware, PZP has been successfully used for decades to humanely and effectively manage populations of wild ungulates. In addition to being tried and tested, it is also cost-effective. By contrast, other methods of population management have not been tested for safety and efficacy, and should be avoided. For example, IUDs raise potentially serious and even life-threatening peri-and post-procedural complications including but not limited to severe chronic pain, infection, and interference with other organs - effects which managers would not be able to monitor, let alone effectively ameliorate.

Recent population surveys have indicated that horses have strayed outside of the Territory. Instead of removing them from the National Forest entirely, every effort should be made to return these animals back to the Wild Horse Territory. To this end, the Forest Service should employ bait and water trapping to relocate these horses. Helicopter roundups should be avoided at all costs. Because of humane and safety concerns, the use of aircraft to round up wild equines was banned by the 1959 predecessor to the 1971 Wild Horses and Burros Act. The many tragic, well-documented instances of serious injuries and fatalities resulting from helicopter roundups of wild equines on BLM and Forest Service lands in the intervening years clearly show that helicopters remain an inhumane and inappropriate means of rounding up wild equines, being neither safe nor cost-effective.

While horses which have strayed outside of the Territory should be returned to the Territory through bait and water trapping, horses should not be removed permanently from the area. Under no circumstances should hundreds of horses be removed at a time (as proposed in the instant irresponsible proposal) and added to the thousands of horses currently held in government holding facilities throughout the country, at indefensible cost, and also at high risk of slaughter and/ or sale to irresponsible buyers.

Instead of wasting taxpayer dollars to use expensive and environmentally disruptive helicopters to hunt down and remove four-fifths of the already very small herd of just 500 horses of the Heber Wild Territory, the Forest Service should instead fulfill its mandate to sustainably manage the Apache-Sitgreaves National Forest in an environmentally responsible manner for a variety of sustainable uses.To do so responsibly, the Forest Service MUST, without question, limit livestock grazing in the Heber WHT to environmentally sustainable levels while concomitantly raising forage allocation for wild horses, whose numbers are dwarfed by numbers of privately-owned livestock and who in any case have a lighter per head environmental footprint than do livestock such as cattle. At the same time, the Forest Service must take its mandate to protect the wild horses of the Heber WHT from harm, and it must do everything in its power to find and bring to justice those responsible for the recent killings.

The proposed plan as drafted is indefensible. It protects neither the horses nor the forest itself. The Forest Service must withdraw it, and instead come up with an entirely new plan which takes into account the reasonable recommendations outlined above. As an American who cares deeply about the health of our national forests and our wild equines, I urgently call on you to take my recommendations into account when drafting a replacement plan.

Sincerely,

Janet Lynch