



## *Arizona Farm Bureau Federation*

325 S. Higley Rd, Suite 210  
Gilbert, AZ 85296

April 22, 2021

Heber Wild Horse Territory Management Plan  
PO Box 640  
Springerville, AZ 85938

Submitted online at <https://cara.ecosystem-management.org/Public/CommentInput?project=18916>

RE: Environmental assessment analyzing and draft territory management plan for the Heber Wild Horse Territory Management Plan Project

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. A number of our members are negatively impacted by the overpopulation of wild horses protected under the Wild Free-Roaming Horse and Burro Act, including those who live and ranch in or near the Heber Wild Horse Territory. With wild horse populations increasing at a rate of 18 to 20 percent per year, we support all management tools available to address their overpopulation. As such, we support the Forest Service's (FS) draft Environmental Assessment (EA) and the proposed action of Alternative 2 with some caveats.

It is noted in the EA and Draft Management plan that the original number of horses in the Heber Wild Horse Territory, which encompasses 19,700 acres, was six mares and 1 stallion. The draft Management Plan and EA both propose a population of 50 to 104 horses. We support our members who live and ranch in the area who believe the population target should be reduced to 24 horses and managed like other grazing animals.

Grazing permittees on FS land are limited to using only so much of the grass on permitted land to ensure vegetation is properly maintained. According to area ranchers, the calculation of the grass usage for livestock allotments in the areas was based on grazing by livestock and deer, horses were not included. Permittees are required to remove and rotate livestock among pastures to meet the usage requirements of their permits. However wild horses in the same areas, are there year-round, which gives little opportunity for grasses to regenerate properly. The FS should consider converting to the territory an allotment to better manage not only the horses, but the land and vegetation as well. Furthermore, given current drought conditions, it is difficult to remove a large population of horses in a given time frame to prevent them from overwhelming watering holes and diminishing feed stocks. For these reasons we support reducing the number of horses proposed for the territory.

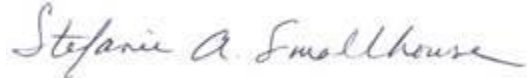
In addition to the management to tools proposed in the EA for reducing excess horses, we strongly encourage the FS to consider including the Fort Apache Tribe in its gathering of horses. Given the

proximity of the Heber Wild Horse Territory to tribal lands, there is a strong likelihood that some of the wild horses are in fact tribal horses. The Fort Apache Tribe should be given the opportunity to claim their horses if they in fact belong to them.

We also encourage the FS to provide postings on gates and fences in and around the wild horse areas noting that only authorized personnel have permission to open and close gates. If unauthorized use of the gates occurs or fences are damaged, horses that are found in nonterritorial horse areas should be removed by FS personnel in a timely manner.

With the current population of between 270 and 420 wild horses in the Heber Territory and current drought conditions, it is imperative that all the management tools included in the EA and the Management Plan be employed. We further encourage the FS to consider our recommendations regarding population and management. This will help ensure the long-term sustainability of the vegetation and all the multiple uses taking place in the Heber Wild Horse Territory and the surrounding area.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation