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Comments: I believe it is important for the Heber wild horses to be preserved and protected as a wild and free-roaming herd.

It's in the name... Wild Free-Roaming Horses and Burros Act of 1971 - Require the FS to take a good hard look at all the internal cattle pasture fences and how the fences affect the ability of the horses to migrate for forage and water and to intermingle with each other. The internal fences give principle use to livestock when wild horses are to have principle use. Enlarging some gates and leaving them open at certain times does not allow for the free roaming of wild horses. The drought of 2018 is a perfect example of what can go wrong due to the fences having prevented bands of wild horses from accessing water.

The FS states "Unmanaged horses increase in population rapidly". Require the census numbers from 2005 to the present day that substantiates their claim that the Heber herd population has grown rapidly. Require factual herd population numbers and proof as in photos and other documentation since 2005 to the present day.

Require the Forest Service to provide scientific data that shows there is an overpopulation of horses in the Heber herd. They have provided no scientific data only an arbitrary and capricious appropriate management level (AML) of 50-104 horses. Keep in mind that if they put forth this plan they will aim to cull way below their upper limit of 104 horses. Even 104 horses is well below genetic viability of a wild horse herd. Make no mistake, this is a plan for the extinction of the Heber herd.

Require hard data that shows water and forage consumption of every grazing species in the forest both domestic and wild. Considering usage of only one species does not provide the scientific data to determine an appropriate population of any species in that area.

Require all info and data on grazing allotments and grazing periods for each and number of livestock cow/calf pairs, if they are imported from other states and if so, what states, for that period and a map of the allotments including name(s) or company names of allotment holders.

Require data that supports the decision to have designated only that particular area of the forest as the Heber Wild Horse Territory. Wild horse and burro Territories and HMAs were to be designated according to where there were wild horses and burros in 1971. A Territory was not to be drawn and then a population count conducted afterwards for only that area. Historical accounts show wild horses had been roaming through the forest well before cattle allotment and pasture fences had been installed in the 1930s, which at that point cut wild horses off from completely free roaming. Where is any data that shows the only area where there were wild horses in the Sitgreaves was in what they designated as the HWHT in 1973-74? The USFS maintains that there were? ?only seven? ?wild free-roaming horses on the Territory when the Act was set forth and no horses between? ?1992? ?and? ?2004. However in federal court they were unable to substantiate those numbers and those numbers were deemed moot.

Require the Forest Service to take a good hard look at who they will appoint to be the decision maker should they go forth with their plan to cull the Heber herd. Culling a wild horse herd requires a wealth of knowledge of the entire herd. Bringing in a "wild horse liaison" for a four month period did not make her an expert by any means. If a cull takes place, wild horse bands will be destroyed. Wild horses are not livestock like cattle and sheep. Wild horses have complex family structures that only nature truly understands. In the wild nature determines the genes that will continue to make a herd strong through survival of the fittest. Require the FS to state how they will scientifically determine which horses stay and which will be removed. If birth control is used, require the FS

to state how they will scientifically determine which mares will be given birth control and what method will be used to determine the schedule. Any roundup of wild horses is very disruptive to the entire herd and will have negative effects.

Further, this herd has already been impacted by the senseless shooting of more than a dozen members of the herd. No one has been caught and held accountable for this horrific action. There is no need for a cull.