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Comments: My concern is less with the (per your count) 27 horses within the Heber Wild Horse Territory (HWHT), but with the 250+ (per your count) horses outside of the HWHT. Based on your report, the 'management plan' appears to consider these animals to be unprotected legally and would therefore be gathered and removed from Forest Lands. I do not support this component of the proposed plan.

1. Based on your report, there is no ecological reason to remove these animals. Page 12 of the report indicates, at length, that the biodiversity and forage thresholds are "healthy, vigorous and diverse". There is sufficient forage for grazing of horses, wild animals and evidently, contracted livestock.

2. All animals also appear to be healthy, per your report, so there is no biological/health reason to remove them.

3. To quote your report. "Because there is no definitive historical or biological basis to establish a connection or disconnection between the original protected band for which the territory was designated and the current horse population, the unbranded and unclaimed free-roaming horses currently associated with the Heber Wild Horse Territory will be managed under provisions of the act as wild horses"

Your plan states that the horses within the HWHT will be managed under the provisions of the Act. It cannot be proved that the bloodline of the HWH, either within or outside of the HWHT, is or IS NOT connected to the original protected band. It should go without saying that horses do not recognize geo-political boundaries. They go wherever they choose, driven by accessible water, forage and the adequate space needed for biological diversity (as is found with all wild animals). It is certain that individual horses, or bands, migrate into and out of the HWHT on a daily basis. In fact, your plan indicates that these animals migrate up- or down-elevation throughout the year. This leads to the hypothesis that the ENTIRE population of wild horses, located throughout the Mogollon Rim range, constitutes the actual HWH herd.

Ergo, the horses outside of the geographic boundaries of the HWHT should also be managed under the provisions of the act, as potential progeny of the original herd.

3. Based on the historical portion of the plan (pg 5), the original HWHT was designated to accommodate approximately 8 horses. Per your plan, "Horses are occupying areas outside of the Heber Wild Horse Territory not designated for their long-term maintenance". The options described in the plan only consider shrinking the now large herd of horses, disguised under the term "management". The herd has grown to now inhabit a wide region, from west of Forest Lakes to well east of Heber. As previously stated, this behavior reinforces their status as wild rather than 'stray' - the reluctance to gather into large herds. Instead of shrinking this herd why cannot we expand their territory to include the space they have already claimed? It is my firm belief that the general public enjoys the presence of wild horses and would support, both in concept and in fact, the preservation of wild horses in the larger region.

My family lives half-time in Forest Lakes (summer residents) and residents fully enjoy the presence of wild horses throughout the region. There is sufficient forage and water for all grazing animals in our area, and they enjoy good health. Your plan, if I understand it correctly, dooms these animals to relocation or adoption (neither of which are likely) or death. My preference would be that the Forest Service expand the HWHT to include the entire range the horses now inhabit.