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Comments: I am writing to submit my comments in response to the USFS scoping notice for the Heber Wild Horse Territory Management Plan. As a taxpayer and member of the public, I greatly appreciate and value the Heber wild horses. Having the opportunity to visit and read about these wild horses they are an integral part of my enjoyment of these public lands and the Apache-Sitgreaves National Forest, so I am urging USFS to consider the following.

AML and Forage Allocation: The Appropriate Management Level (AML) must conform to the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA). The minimum for a genetically viable herd--recommended by the BLM Wild Horse & Burro Handbook-Cothran 2009-- should be at least 150 horses, in order to have 50 breeding animals. As outlined in the 1971 WFRHBA ACT, AUMs or forage allocation within the Heber Wild Horse Territory must be designated "principally but not necessarily exclusively to wild horses." That certainly should mean 50% of the forage allocated for the wild horses.

Natural Behaviors: As noted by the National Academy of Sciences, preserving natural behaviors is critical to the health and welfare of wild horses. The Management Plan must make that a priority, which rules out such things as:

- sex ratio skewing which causes stallions to be more aggressive because of the unnatural ratio of males to females.
- castration, ovariectomy and other surgical sterilization that alters the animal's ability to produce natural hormones.
- fertility control that alters the production of natural hormones.

Management and Fertility Control: Given the unique situation of the Heber wild horses and the history of fires in that area, any Management Plan must include horses outside the designated territory through PZP and relocation--not removals. The size of the Heber herd makes it an ideal candidate for the use and tracking of PZP. Volunteer organizations are ready, willing and able to work with USFS to implement this humane management that prevents and excludes expensive and destructive removals, and allows wild horses to live and die wild as intended by the WFRHBA.

Fencing: Based on the USFS fence/observation map provided, it is clear that fencing is keeping horses from fully utilizing much of the Territory. To conform with the intent of Congress and the WFRHBA Any fencing within their territory must be removed.

Boundaries: Horses don't respect the lines and boundaries humans create, and historically, the Heber horses have used territory for decades that was omitted in the drawings. The Management Plan must address seasonal movement of the horses and make a recommendation that the boundary be redrawn to be in conformance with historic wild horse usage and the animals' need to have access to suitable habitat throughout the year. All source documents regarding historic horse use should be included in the Management Plan appendix.

Census: I also urge the USFS to do a census to confirm the population number. Photo mark-recapture methodology should be used in the next census.

Americans care deeply about our wild horses, our living history. That's why Congress unanimously passed the WFRHBA. I urge the USFS to listen to the public, to citizens like me, when creating a management plan for these cherished American icons.

Thank you.

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