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First name: Paola
Last name: Scodellari
Organization:
Title:
Comments: I submit these comments in response to the USFS scoping notice for the Heber Wild Horse Territory Management Plan. As a member of the public, I greatly appreciate the Heber wild horses. Having the opportunity to visit and read about these wild horses provides me with great enjoyment of our public lands. I have a strong appreciation for the Apache-Sitgreaves National Forest because the Heber wild horses live in this area. Below are issues that the Management Plan must address.

AML and Forage Allocation: The Appropriate Management Level (AML) must be in conformance with the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA). To meet the minimum standard for a genetically viable herd, AML should be at least 150 horses (in order to have 50 effective breeding animals). This is specifically recommended by the BLM Wild Horse and Burro Handbook in order to maintain an acceptable level of genetic diversity (Cothran, 2009). AUMs or forage allocation within the Heber Wild Horse Territory must be designated "principally but not necessarily exclusively to wild horses" as outlined in the 1971 Act (WFRHBA). At minimum, the Heber Herd should be allocated 50% of the forage in their own dedicated Territory.

Natural Behaviors: The Management Plan must prioritize preserving natural wild horse behaviors. As the National Academy of Sciences determined "preserving natural behaviors is an important criterion" for wild horse management. Therefore, the following should be precluded from management actions:

- sex ratio skewing which causes stallion aggression due to the unnatural ratio of males to females;
- castration, ovariectomy and other surgical sterilization that alters the animal's ability to produce natural hormones; and
- any fertility control that alters the production of natural hormones.

Management and Fertility Control: Given the unique situation regarding the Heber wild horses and the history of catastrophic fires in the area, the Management Plan must include managing horses outside of the Territory through PZP and relocations not removals. The Heber wild horses in and outside of the Territory can be easily controlled and reduced through natural attrition and with the use of PZP. Volunteer organizations would be happy to work with USFS to implement this humane management that prevents and excludes removals, and allows wild horses to live and die wild as intended by the WFRHBA.

Fencing: It is clear, based on the USFS pasture fence/horse observation map provided, that fencing is impeding horses from fully utilizing much of the Territory. Any fencing within the Territory that prevents free movement must be removed. This is inhumane, wrong and not in conformance with Congress' intent.

Boundaries: Based on historic information, it appears the Territory boundary was incorrectly drawn and adjacent lands that have been seasonally used by wild horses for decades were omitted from the Territory boundary. 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: Prior to drafting the proposed Management Plan, USFS must conduct a current census to confirm the population number. Photo mark-recapture methodology should be employed in the next census.

Congress unanimously passed the WFRHBA because Americans care about our wild horses and burros. USFS must listen to the public when creating a management plan for these cherished American icons.

Thank you.

February 29, 2020