

Data Submitted (UTC 11): 3/2/2020 2:19:19 AM

First name: Debra

Last name: Hunt

Organization:

Title:

Comments: I am submitting comments in regards to the USFS scoping notice for the Heber Wild Horse Territory Management Plan.

As an American taxpayer and a member of the American public, I appreciate all our wild horses, including the Heber wild horses. While the FLMPA says we must have multi use on our original lands, I do not agree if giving the majority of lands to Carrie business's so they can make profit on our lands while our wildlife including wild horses are pushed out. This is definitely not fair or acceptable to the public. Therefore, the following are issues that the Management Plan must seriously address for it to be acceptable.

AML and Forage Allocation:

A. 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, the 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).
B. 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. This would be fair and ethical.

Natural Behaviors:

The Management Plan must prioritize preserving natural wild horse behaviors. As the National Academy of Sciences NAS determined "preserving natural behaviors is an important criterion" for wild horse management.

Therefore, the following should be precluded from management actions:

1. sex ratio skewing which causes stallion aggression due to the unnatural ratio of males to females;
2. castration, ovariectomy and other surgical sterilization that alters the animal's ability to produce natural hormones; and
3. 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 unfortunate history of catastrophic fires in the area, the Management Plan must include managing horses outside of the Territory through both PZP and relocations not horse removals. I have no doubt that 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.

I would also imagine that there are volunteer organizations that 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: Fencing is destructive to all wildlife including wild horses. The use of fencing that does harm should be reminded. Based on the USFS pasture fence and horse observation map you provided, your fencing is impeding horses from fully utilizing much of the Territory. Any fencing within the Territory that prevents free movement must be removed. It is unethical to continue to allow this fencing to be utilized.

Boundaries: I have been informed from historic information, the Territory boundary was incorrectly drawn and adjacent lands that have been seasonally used by wild horses for decades were omitted and left out from the Territory boundary. I'm not sure why, but it needs to be included. 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.

Population/Census: Prior to drafting the proposed Management Plan, USFS must conduct a current census to confirm the population number.

Our Congress unanimously passed the WFRHBA because Americans like myself care about our wild horses and burros. They have been here on these lands for thousands of years prior to the first settlers. They have a right to continue to live on these lands without being cast aside for cattle or other developments. I am asking that the USFS listen to the public when creating a management plan for these cherished American icons.

Thank you.