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Comments: Please accept these comments regarding the US Forest Service scoping notice for the Heber Wild Horse Territory Management Plan. The Heber horses are a vital component of the Apache-Sitgreaves National Forest and what draws me to this part of our public heritage. Please address these issues in the plan:

1. Forage Allocation and Appropriate Management Level (AML). As a bare minimum , the Heber wild horse herd should be allocated 50 percent of the forage in their federally designated territory. As spelled out in the 1971 Wild Free-Roaming Horses and Burro Act, forage allocation needs to be designated "principally but not necessarily exclusively to wild horses." To meet the requirement for a genetically viable herd, and the standard recommended by the BLM's WHB Handbook, AML should be at the very minimum 150 horses. This would provide 50 breeding animals and is that recommended by equine geneticist Gus Cothran (Cothran, 2009).
2. Fertility Control. I strongly recommend that PZP, a humane and well-proven method of population management, be applied taking advantage of volunteer organizations working in cooperation with USFS. PZP, along with natural attrition, provide a path to keep population in check as an alternative to removals.
3. Free-Roaming Behaviors. The National Research Council's 2013 report on the BLM WHB Program found that "preserving natural behaviors is an important criterion" for wild horse management. As such, and to conform with the spirit and original intent of the 1971 WFRHBA, the management plan should exclude any action that allows sex ratio tampering, surgical sterilization (ovariectomy or castration), and any method of population control that would block the production of natural hormones.
4. Census. Before preparing a management plan, USFAS must conduct a current census to determine the real population of the herd, using photo mark-recapture methodology for accuracy.
5. Fencing. Any fence barriers that prevent free movement of the herd or keep the herd from accessing the full territory must be removed. This violates the WFRHBA.
6. Boundaries. The Management Plan must recommend that the boundaries be corrected to take historic wild horse usage and the need for sufficient seasonable habitat use into account. Source documents that address historic wild horse utilization of the territory must be included in the Plan appendix.

As a member of the public, a wild horse guardian and animal welfare specialist, I urge the USFS to take our voices and the needs of the wild horses -- as expressed in the WFRHBA -- into account. The Heber wild horses provide many essential ecological services for the public lands of which they are an integral and historic part. Please respect their lives and our concerns for this American heritage.