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Comments: March 2nd, 2020

M. Stephen Best, Forest Supervisor: Apache-Sitgreaves National Forests (ASNF)

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Re: Input to Heber Wild Horse Territory Management Plan Project; Due March 16th, 2020,

Dear Mr. Best & ASNF team:

Thank you for notifying me of your draft Proposed Action: Heber Wild Horse Territory Management Plan, which I have now thoroughly perused. I appreciate the ample scope of your analysis with its presentation of the history of the area and detailed methodologies, however I believe there are important aspects of this subject that have been overlooked.

This old historic wild horse territory is said to count on 19,700 acres in the Black Canyon area southwest of Heber, Arizona & to have been established in 1974, three years after the 1971 passage of the Wild Free-Roaming Horses & Burros Act (WFHBA). The criteria for establishing the territory is the presence of any unclaimed, unbranded wild horses and burros at the passage of the WFHBA. Any reasonable interpretation of this law would take this to mean the wild horses' and burros' year-round habitat, not just where they were at the moment of the act's passage in Congress. I sincerely question that this territory is only 19,700 acres & wonder whether any documentation exists that they was not in a greater wild-horse-occupied habitat.

From your description of the territory with the existence of natural as well as man-made barriers, I would consider this to be a suitable area for applying a specially tailored Reserve Design strategy in order to achieve three important objectives that would fulfill the true and core intent of the WFHBA. To better understand Reserve Design see [www.gofundme.com/mstngreservedesign](http://www.gofundme.com/mstngreservedesign) . Here are the three objectives:

(1) Allowing this unique herd to achieve a population that would permit long-term genetic viability. The Appropriate Management Level (AML) you are proposing of between a low of 50 & a high of 104 horses is much too low to assure genetic viability. At its mean of 77, there would be 256 acres per individual wild horse, which seems overly sparse considering that WFHBA clearly states the legal areas of the wild horses & burros are to be "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands" (Section 2 c). Furthermore, in regard to this core tenet of the WFHBA, your document seriously neglects to reveal the relative proportion of livestock usage of resources, especially forage & water, within the Heber Wild Horse Territory (HWHT). Although you list the permittees who graze their livestock within the HWHT, you should have revealed the corresponding amount of forage consumption by these permitted livestock as Animal Unit Months (AUMs) & how this compares with forage consumption by the wild horses of the HWHT. I ask that you remedy this oversight in your revised HWHT plan. If the livestock AUMs are exceedingly greater than the wild horse AUMs, which no doubt they are, then steps should be taken to lessen livestock & increase wild horses, especially considering how inadequate your AML of 50 to 104 individuals is compared with a truly long-term, genetically viable population level. The latter should be in the thousands, not less than one hundred individuals, according to the IUCN SSC Equid Specialist Group's assessment of population viability for equid species, i.e. 2,500 individuals (see Duncan, P. 1992. Zebras, Asses, and Horses: An Action Plan for the Conservation of Wild Equids. IUCN Species Survival Commission, Equid Specialist Group. Gland, Switzerland).

The map you present of livestock grazing & livestock allotment fencing within the HWHT indicates that livestock (I assume mostly cattle) are, in fact, the principal recipients of resources within the HWHT - a situation that is contrary to WFHBA's true intent. As concerns the Multiple Use Act, restoring the Heber wild horses to a higher, more truly viable population level, & with the forage, water, shelter & other habitat needs to go with it, would be a truer fulfillment of this act. This is because livestock are a preponderant & even monopolizing presence on our nation's public lands (ca. 90%) & the greater, more just number of wild

horses would restore balance to these lands, especially since they are a different type of herbivore with a different digestive system than the pre-gastric, multi-stomach digesting ruminant herbivores, such as cattle, sheep & deer that are so enormously promoted & subsidized upon the public lands. In fact, it is the wild horses & burros who would very effectively complement these ruminant species by restoring soils & seeding a variety of plant species to a much greater degree than ruminants do. These equids are ancient presences in North America - their cradle of evolution - & their restoration here would be the reinstatement of a sorely lacking component. This would result in much restorative healing to the ecosystem. Also, because of the special role & niche of the wild horses, a much greater mitigation & even prevention of catastrophic wildfires would ensue, since equids are, by nature, more capable of handling drier, coarser, more flammable vegetation & of reducing this over vast areas, including areas inaccessible to cattle & sheep. This relates to their high & frequent mobility & the versatility of such as concerns steepness, rockiness, etc. Also their droppings - a key factor - are more nutrient-rich & moisture-retaining when compared with those of ruminants &, as a consequence, they increase water tables, or aquifers, in their habitats & also increase the abundance & diversity of plant species including natives (they coevolved with most of these over millions of years). Another important consideration is that wild horse trails typically form as their bands displace themselves from one key area to another & become natural fire breaks that reduce the spread of wildfires, as are often caused by lightning, careless campers, sparks from vehicles & other factors. These are all important points you should consider in favor of a greater, more truly viable population of wild horses in the HWHT. A wild-horse-containing ecosystem is an enhanced ecosystem.

Now, to continue the goals of Reserve Design:

(2). A specially tailored Reserve Design would allow the Heber wild horses to fill their important niche & role within this & around this territory. It would allow them to realize a balance & complementarity with the other species of plants & animals found here. In order for this worthy goal to be achieved, we people must allow it to happen - not be continually imposing our own selfish & often dis-attuned designs upon nature, but rather learning to appreciate all the living species here & to respect the inherent wisdom of successional processes. This would be the true fulfillment of the WFHBA, not mere token population assignment & resource allowance such as the current plan proposes.

(3) Reserve Design would result in a natural stabilization of the wild horse population within its complete & viably resourced habitat. For the herd would be allowed to fill its ecological niche here, achieve mature social units, or "bands," wherein the mature stallions & mares inhibit premature reproduction among the younger band members - their progeny & there is a wholesome vying among stallions that maintains herd fitness. This is well proven, but the frequent roundups - often by brutal helicopter drives - thwart this wise & natural population stabilization by the wild horses themselves. The latter would truly conform with the original, wild-horse-benign intent of the WFHBA, including in its Section 3 a where it mandates the USFS (& BLM) to manage wild horses (& burros) so as "to achieve and maintain a thriving natural ecological balance on the public lands" & "at the minimum feasible level" of interference. There is great wisdom in this provision - but I just wish that these words' true meaning were better appreciated, taken to heart & implemented. (Please do not hesitate in contacting me for help in adopting a correct & sensitive Reserve Design strategy for the unique & important Heber wild horses & habitat.)

... Now to continue.

I strongly recommend that you activate possibilities under Section 6 of the WFHBA. This authorizes cooperative agreements with nearby private landowners & state & local governments that control nearby or adjacent lands in order to better accomplish the goals of WFHBA. I believe that you should set up of a cooperative agreement with the Fort Apache Reservation that borders the HWHT. This large reservation has had wild horses for generations. By working out a cooperative agreement with this tribal nation, a truly long-term viable wild horse population could be realized within a truly viably sized habitat wherein these wild horses, of historically proven relation to each other, would be able to become genetically viable & to fill their niche & harmoniously adapt within this special part of our nation & world. But the challenge remains to get enough key people on board for this worth-while goal.

Similarly Section 4 of the WFHBA could be used to achieve a complete habitat for a truly viably sized wild horse population here. It would establish agreements with adjacent private land owners or persons who lease

government land. The crucial ingredient needed is the vision & the will to accomplish this.

I wish to compliment you on your adoption of the Wild Horse Annie cattle guards with rebars & appreciate your detailed description of how to construct them & their importance in preventing the gruesome suffering & death of wild horses who could be panicked by automobile, horseback or helicopter chases & running inadvertently into these guards. Such gruesome incidents I have witnessed were mainly caused by helicopter roundups but also include those caused by automobile chasing. The horses' legs were snapped to leave them lying in agony & despair as they expired. Needless to say, this is a tragic & pitiful sight. For this & other reasons, I urge you to not only construct new Wild Horse Annie cattle guards, but also to retrofit with rebars all existing cattle guards in & around the HWHT.

Concerning the administration of PZP, GonaCon & other sterilization drugs as well as any mare ovariectomies & stallion castrations, none of these should be adopted in your HWHT plan! Neither should the unnatural skewing of sex ratios be employed! These disrupt normal wild horse behavior, thwart their ability to survive in the long term, affect their social integrity, causing stress & dissension among wild horses, between stallions & also between mares & stallions & even between mares, as I have observed in the field. All these unnatural manipulations are cruel & contrary to the true intent of the WFHBA. They are tantamount to domesticating them. They take away the natural vitality & well-functioning of the horses & should not be approved. Reserve Design is the correct way to achieve population stabilization &, at the same time, true genetic viability & the harmonious adaptation to the ecosystem by these very worthy horses. (See [www.facebook.com/notes/craig-downer/will-there-be-a-healthy-future-for-Americas-wild-horses-and-burros-in-the-wild-p/1120228514679820](http://www.facebook.com/notes/craig-downer/will-there-be-a-healthy-future-for-Americas-wild-horses-and-burros-in-the-wild-p/1120228514679820) .)

Other points I have noticed throughout your document now follow:

Figure 2 & surrounding pages: Re: livestock permittees: In addition to cutbacks in the level of livestock grazing in the HWHT, offers to buy out grazing permits at fair market value should be considered.

p. 12: Regarding the 406,000-acre, 2002 Rodeo-Chediski wildfire & damage to the boundary fence with Ft. Apache reservation, I call to your attention that wild, free-roaming horses can both mitigate and even prevent catastrophic wildfires for reasons given above. Also, they greatly aid in the restoration of ecosystems that have been swept by wildfires. This is owing to their wide-ranging mobility & their post-gastric digestive system, which restores large amounts of vital humus to fire-ravished soils & to their significant dispersal of intact seeds of a great variety, including native, which then go on to germinate, especially in soils made humus rich, i.e. naturally fertilized by the horses themselves.

p. 8-9: I laud actions to more widely open up gates in fences during the entire seasons when livestock are not permitted in the HWHT, but recommend that ASNF have as a goal the elimination of these fences within the HWHT in order to restore the free-roaming lifestyle of the wild horses. This will balance habitat usage over time, allowing natural rest rotation of foraging over all seasons of the year & even multi-year time frames.

p. 14: Good goals, Tiers 1 - 3.

p. 15: Adaptive Management is laudable, but care should be taken to see that it works for the benefit of the wild, naturally living horses themselves, not just the ranchers or other resource exploiters operating within & around the HWHT.

p. 16: Concerning the need for regular monitoring that could result in changes in wild horse management, you should apply this monitoring to the effects that other factors such as, especially livestock grazing, trailing & trespass, off-highway-vehicles (OHVs), hunter activities, mining, etc.

Tools to change patterns of horse use: I disfavor juniper removal, as junipers are important to the ecosystem & important to the wild horses for shelter from heating sun in summer & cold storms in winter, as also to many other species, including birds, rodents, deer, vital insects, etc. Concerning prescribed burning, the wild horses themselves would greatly help to thin vegetation & open up thickets - if there were enough of them. Your proposed AML is much too low: they are not being permitted to fill their ecological niche & role here.

p. 17-18: Criteria for "excess" & "threshold": I think it is quite arbitrary to merely say that if the horses exceed the high end of the AML, i.e. 104, then they are "excess" & must be reduced to low end AML, i.e. 50.

Monitoring exists to prevent such arbitrariness. For example, if forage is increasing, the number of wild horses should be allowed to increase in the HWHT. ... I can see a problem arising here: if livestock foraging receives special favor, then the wild horses could be targeted for reduction when resources are strained. Also in this

regard, your analysis in this plan should reveal the seasons of use by livestock within the HWHT so as to permit the reviewer a comparison of exactly what proportion of forage (particularly in seasons of its highest nutritional value) are going to domestic livestock & what portion are going to the wild horses & other wildlife living here. This is a critical point.

p. 20: I favor Water Development and fencing of critical areas that are deteriorating, such as springs and riparian habitats, meadows & other vital areas, likely impacted by livestock or other factors. This will protect these & permit their recovery. However, please take care not to always be blaming wild horses for the damage that livestock, OHVs & other factors are causing. In other words, be fair & be honest.

p. 21: I greatly favor excess fence removal.

p. 23 - 24: I greatly favor the Wild Horse Annie cattle guards (see earlier comments).

p. 25: I strongly oppose fertility control. This is antithetical to the true purposes of the WFHBA. It is a domestication of the wild horses & undermines their ability to survive. I consider it an abrogation of responsibility under the WFHBA.

p. 29: Henneke condition score of 4 should be considered not alarmingly serious. Many wild horses are on the lean side, especially during certain seasons but they rapidly recover during more abundant seasons for forage, water, milder temperatures & weather, etc. This is the nature of living wild. Even ones at 3 should not be removed, but rather provisions to assure they have sufficient resources should be made for their long-term health & well-being. Besides, the WFHBA says that the wild horses should become an integral part of the public lands ecosystem. This means they should be born, live out their lives & pass on out in the wild, & when passing on they should be allowed to contribute their remains to the ecosystem that has been their home & sustained them all the years of their lives. This is what living as an "integral" part of the public ecosystem means! Obviously the livestock that reap the main portion of the forage do not contribute their remains, but are herded off to be consumed by people.

p. 30: Table 6: You need to set up Cooperative Agreements under Section 6 & even 4 of the WFHBA so that wild horses can have complete, long-term-viable habitat for a genetically long-term-viable population here. Table 7: Regarding stray horse monitoring, please watch out, as this could be used as a means of overly reducing the Heber wild horse population. These horses should be treated fairly & respectfully - not targeted in a biased manner!

p. 32: Appendix C. Comprehensive Animal Welfare Standards. I recommend you affix a Go-Pro audio-video camera on each helicopter used in gathering the wild horses so that the public can observe exactly what is happening to its wild horses on its public lands. This does not imply that I approve of helicopters.

p. 34: Regarding, no gather when temperature < 10 deg. F. or > 95 deg. F. without the approval of ASNF wild horse staff. This is the least we humans should do, but I have attended roundups in Nevada where it has been minus 12 deg. F. & we observers begged the BLM official in charge, the "core," to call off the roundup, but he callously proceeded with the helicopter chases -- & many of the gathered horses later died of pneumonia in holding as a consequence! This happened out in eastern Nevada. I have written & complained about this.

p. 42: Appendix D. Population Management. The description of the Pros & Cons of the various methods including PZP are superficial & not thorough. They ignore many of the serious detrimental consequences of these highly invasive actions aimed at altering the natural life cycles & behaviors that thwart their natural adaptation & the balance these wild horses should be allowed to achieve within their natural --& legal -- home. I strongly oppose all of these cruel & coarse transgressions against the true integrity of the wild horses! Reserve Design is the right, honest, ecologically & morally correct way to provide for the wild horses & to fulfill the true intent of the WFHBA. Please check out my proposal link above.

I again thank you for including me in this review process & for putting together this proposed management plan & description concerning the special Heber wild horses & their legal habitat. It is a step in the process that shall lead to true justice & I look forward to your next communication concerning these wonderful returned native, national heritage species. They mean the world to me, as to many others. You should treat them fairly & with due consideration. Horse kind has done so much to help our human kind. Now isn't it high time we do something truly good for them? And What better way than letting them be themselves, live free & count on a natural home wherein to realize their greater place & role upon our shared home - this fascinating planet Earth?

Sincerely,  
Craig C. Downer, Wildlife Ecologist  
Wild Horse and Burro Fund/Andean Tapir Fund