

Data Submitted (UTC 11): 3/6/2020 3:58:36 AM

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Organization:

Title:

Comments: Re: Draft Proposed Action for the Heber Wild Horse Territory Management Plan

I am opposed to what has been put forth in this draft plan. This plan is not a compromise. It is a plan to eliminate the wild free roaming horses in the Apache Sitgreaves Forest. If the Draft Proposed Action for the Heber Wild Horse Territory Management Plan is implemented the majority of the Heber wild horses will be captured and removed and the herd population that is left will be too small to be genetically viable. I am opposed to that end result.

I live next to this forest and spend much time in the forest, scouting, hunting, capturing images of the wildlife on multiple game cameras strategically installed throughout the forest. I do not see a problem with the horse population. I pay local, state and federal taxes. I communicate regularly with my local, state and federal elected representatives on a regular basis to let them know when there are matters that need to be addressed. Recently, I have been communicating with them regarding the illegal shootings of the wild horses that have occurred over the last two years.

The Wild Free-Roaming Horses and Burros Act (WFHBA) of 1971 requires the Forest Service to look at all the internal cattle pasture fences and how the fences affect the ability of the horses to migrate for forage and water and to intermingle with each other. The internal fences give principle use to livestock when wild horses are to have principle use. Enlarging some gates and leaving them open at certain times does not allow for the free roaming of wild horses. The drought of 2018 is a perfect example of what can go wrong due to the fences having prevented bands of wild horses from accessing water.

I request the following requirements to be put into the Environmental Assessment Plan:

- 1)The Forest Service must provide census numbers from 2005 to the present day that substantiates their claim that the Heber herd population has grown rapidly.
 - 2)Factual herd population numbers must be reported and proof as in photos and other documentation since 2005 to the present day.
 - 3)The Forest Service must provide scientific data that shows there is an overpopulation of horses in the Heber herd.
 - 4)The Forest Service must provide hard data that shows water and forage consumption of every grazing species in the forest both domestic and wild. Considering usage of only one species does not provide the scientific data to determine an appropriate population of any species in that area.
 - 5)The Forest Service must provide all info and data on grazing allotments and grazing periods for each and number of livestock cow/calf pairs, if they are imported from other states and if so, what states, for that period and a map of the allotments including name(s) or company names of allotment holders.
- The WFHBA states: "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands."
- 6)The Forest Service must provide a plan for their protection that would include signage stating the Heber wild horse herd is federally protected and that penalties for capturing, branding, harassment, or death can result in fines up to \$100,000 and a year in prison for each offense.
 - 7)The Forest Service must provide a plan that would call for the Forest Service law enforcement to respond in a timely manner to reported deaths and other violations against the wild horses and conduct their investigations in a complete and thorough manner which would include calling in other agencies who can offer more experience in investigating criminal acts if necessary.
 - 8)The Forest Service must provide a plan to educate the forest rangers and other personnel about wild horses and the Heber wild horse herd.
 - 9)The Forest Service must provide a plan that would instruct Forest Service personnel to not undermine the value of the herd and federal law by saying things such as, "go ahead and take whatever horses you want" which is in direct violation of the Act and Federal Court Order.

10)The Forest Service must provide data that supports the decision to have designated only that particular area of the forest as the Heber Wild Horse Territory. Wild horse and burro Territories and Herd Management Areas were to be designated according to where there were wild horses and burros in 1971. A Territory was not to be drawn and then a population count conducted afterwards for only that area. Historical accounts show wild horses had been roaming through the forest well before cattle allotment and pasture fences had been installed in the 1930s, which at that point cut wild horses off from completely free roaming. Where is any data that shows the only area where there were wild horses in the Sitgreaves was in what they designated as the HWHT in 1973-74? The USFS maintains that there were? ?only seven? ?wild free-roaming horses on the Territory when the Act was set forth and no horses between? ?1992? ?and? ?2004. In federal court they were unable to substantiate those numbers and those numbers were deemed moot.????

11)The Forest Service must take a careful look at who they will appoint to be the decision maker should they go forth with their plan to cull the Heber herd. Culling a wild horse herd requires a wealth of knowledge of the entire herd. If a cull takes place, wild horse bands will be destroyed. Wild horses are not livestock like cattle and sheep. Wild horses have complex family structures. In the wild, nature determines the genes that will continue to make a herd strong through survival of the fittest.

12)The Forest Service must state how they will scientifically determine which horses stay and which will be removed. If birth control is used, require the FS to state how they will scientifically determine which mares will be given birth control and what method will be used to determine the schedule. Any roundup of wild horses is very disruptive to the entire herd and will have negative effects.

13)Provide answers for the following questions:

a)What is the science-based rationale used for allocating forage and habitat resources to various uses within the constraints of protecting rangeland health and various species given the multiple-use land mandate?

b)How are the Appropriate Management Levels (AMLs) for wild horses established, monitored, and adjusted with new information and environmental and / or social change?

c)Has any scientific study concluded that an AML of 50-104 horses provides genetic diversity sufficient for a healthy and self-sustaining herd over the long run? Please disclose that study if it exists.

d)What are the current migration patterns of the existing Heber herd and what is the likelihood that 50-104 horses will stay put on their designated 19,700 acres territory that is not fenced in?

e)How many cows are permitted to graze annually on the 19,700 acres designate as the HWHT?

f)What impact do those livestock have on the rangeland health of the wild horse territory?

g)How many cows are permitted to graze annually on 616,000 acres of the Black Mesa District of the Apache-Sitgreaves National Forest?

h)What impact does that livestock have on the rangeland health of the entire ASNF ecosystem?

i)What is the cost for removal of 200 wild horses from the range and incarceration in government holding pens for the remainder of their lives if adoptive homes are not available?

j)What are the estimated economic impacts caused by a loss of tourism to the Heber-Overgaard communities and the state of Arizona by the removal and eventual decimation of the Heber Wild Horses.