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First name: Gaby

Last name: Loll

Organization:

Title:

Comments: Dear Sirs,

I love wild horses and want them to stay wild and free and therefore

I'm opposed to what has been put forth in this draft plan. I feel it is a blatant attack on the Heber wild horse herd and a plan for extinction of the herd.

In the name of the Wild Free-Roaming Horses and Burros Act of 1971 - it's necessary that you take a good hard 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.

You state "Unmanaged horses increase in population rapidly". I need the census numbers from 2005 to the present day that substantiates your claim that the Heber herd population has grown rapidly. I need factual herd population numbers and proof as in photos and other documentation since 2005 to the present day.

Where is scientific data that shows there is an overpopulation of horses in the Heber herd. You have provided no scientific data only an arbitrary and capricious appropriate management level (AML) of 50-104 horses.

I require 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.

I require 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." Dozens of horses have been fatally shot in the last couple of years. I require 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. 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. A plan to educate the forest rangers and other personnel about wild horses and the Heber wild horse herd. 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.

I require 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 HMAs 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? You maintain 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. However in federal court you were unable to substantiate those numbers and those numbers were deemed moot.

Finally I want you to keep in mind that wild horses have complex family structures that only nature truly understands. In the wild nature determines the genes that will continue to make a herd strong through survival of the fittest. I require you to state how you will scientifically determine which horses stay and which will be removed. If birth control is used, I require to state how you 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.

As I said before, I oppose your plan and wished that the wild horses would ultimately get their rights guaranteed by law.