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Comments: Comments on Heber Wild Horse Territory Plan #18916

#### Comments on the Appropriate Management Level section

I object to the proposed appropriate management level for the Heber Wild Horse Territory of 50 to 104 horses since you have stated that "there is enough forage within the territory to support an upper limit of 104 wild free-roaming horses, while still meeting management direction for other resources..."

I would propose that you change the "management direction for other resources" to give the wild horses a higher priority over some of the "other uses" especially since those "other uses" are not specifically identified anywhere in this proposed Management Action document and some of those "uses" may be destructive to the land such as off-road motor vehicle use and over grazing of livestock.

Although I could not find one universally recommended number to ensure genetic viability, the proposed AML of 50 (lower limit) clearly is not large enough to ensure genetic diversity according to the following excerpt from page 149 of the 2013 National Academy of Sciences (NAS) report Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward:

"It was originally thought that an effective population size of at least 50 was necessary to avoid short-term inbreeding depression, but empirical work suggests that if maintenance of fitness is important, effective population sizes much larger than 50 are necessary. Theoretical studies suggest that the figure could be closer to 5,000 for several reasons....."

Obviously, 5,000 is not a feasible number, however leaving the herd at its current population number probably is the best idea and it would save the cost of gathering and removing any wild horses as well as improve, if not ensure, the genetic viability of the herd.

Surely, reducing the number of livestock grazing to allow the current population of wild horses to remain where they are would be a small number since the estimated population numbers from the most current "Horse-specific survey within the Heber Wild Horse Territory" is from 22 to 51 and the estimate from the most current "Horse-specific survey outside the Heber Wild Horse Territory" is from 270 to 420 (Tables 1 and 2 on page 14 of the Introduction to this plan document.

#### Comments on Appendix B - Adaptive Management and Monitoring Matrix

##### Table 4. Ecosystem health monitoring

In the "Possible Management Responses from Toolbox" column the " Use tools to change horse patterns of use; population growth tools; maintain horse health and habitat; gather and remove" seems to be the only possible suggested remedies. "Gather and remove" should always be the last resort and only if you reduce the number of non-native grazing animals, such as cattle, too.

#### Comments on Appendix D - Population Management

I find it heartening that you are trying to maintain genetic viability in the herds. Thank you for this effort.

#### Specific comments on Table 8. Population management techniques to be considered

Re: Immunocontraception:

PZP should be the only option considered. It is the only one that has been deemed "safe" for mares by thorough

research. (I understand that the "pesticide" association is only due to lack of a more precise designation for PZP, etc. from the FDA.)

Re: Sterilization:

Mares should NOT be spayed, period. This procedure is almost never performed on domestic horses; it is almost impossible to find a vet that will perform this highly dangerous procedure.

Stallions should not be gelded or vasectomized on the range, period.

Re: Relocation: Good idea (if it's absolutely necessary).

You can eliminate the costs associated with interstate relocation by simply relocating gathered horses to another territory within the same state.

Re: Removal:

Removal should be avoided...not just for the "cons" you outline in the table, but because it only makes the situation worse. "Population" experiments have been done for years (mostly on rats, but we're all mammals) that indicate that animals will continue to breed as long they have the conditions (space, food, etc.) that support continued growth - that is, any given population will try to fill its space. Consequently, sudden reductions in populations always cause increased breeding activity, way above the "normal", as the remaining population tries to replenish its prior numbers. Seems strange, but true.

Removals also should be avoided since they inevitably result in the following "disposal" action, #6.

Disposal of problem and nonplaceable animals, noted in Appendix E. (See below.)

Comments on Appendix E - Removal of Excess Animals

Action #6. "Disposal of problem and nonplaceable animals: Excess animals, for which an adoption demand by a qualified applicant does not exist, shall be destroyed in the most humane manner possible. Justification for each disposal action must be supportable and thoroughly documented."

Specific comments on action #6:

1. There is no acceptable justification for destroying healthy animals. No animal, especially one of our magnificent wild horses, should be destroyed to make room for other "public land uses", and especially NOT to increase livestock grazing, which damages the ecosystem.
2. Other than livestock grazing, I can't think of another "use" that the presence of wild horses seriously interferes with. As a hiker and nature photographer, I find that encountering wild horses greatly enhances my experiences on our public lands.
3. Cattle grazing is very destructive to rangeland and riparian ecosystems, much more so than wild horse use (although the horses are an easy scapegoat even though their numbers are a fraction of the number of livestock using the same public lands).
4. In addition on the subject of riparian ecosystems, horses will not defecate in lakes, water holes, etc. They are too smart to pollute their drinking water. On the other hand, I have watched cattle hang out, chest deep, in a pond all afternoon and not even seem to notice when they "relieve" themselves in their cooling bath water. When a horse wants to cool off, they walk into the water, splash themselves for a little while and leave.
5. If you must remove any horses, please relocate them to other wild horse territories that are fast disappearing from the West (and being repopulated by many times the number of grazing cattle and other livestock). If you relocate them to other territories located in the same state, you will eliminate the costs associated with relocating them out of state.

Comments on the Territory History section of the Introduction

The following excerpt from the "Recommendations from the ethnographic study (USDA Forest Service 2017)" in my opinion, provides an outrageous, and almost laughable excuse for removing wild horses from the Heber Wild Horse Territory:

"The history of the area horse herd(s) suggests that there are two periods of occupation. The first period dates between the 1930s to c. 1990, followed by a second period that dates from c. 1990 to the present. The first period encompasses the originally designated herd of seven horses, which more than likely descended from the turned-out Army remount horses or other turned-out horses in the 1930s and then dissipated by c. 1990. The current horse population dating from c. 1990 appears to be a mixture of horses from the Fort Apache Reservation and other unidentified horses with no substantiated link with the originally designated herd.

As such, this study concludes that there is no historical precedent for the current population occupying the area. The history of the horse herds does not provide any conclusive, historical basis for how to designate the horses for the future as the originally designated herd does not appear to be extant.

Therefore, it is the recommendation of the author that the Forest and interested parties determine future direction and management of the Territory based on the current condition and population of horses."

Specific Comments - Seriously, speaking of history...the Forest Service and BLM have been doing everything in their power to eliminate wild horse territories all across the West since the day the President Nixon signed The Wild and Free-Roaming Horses and Burros Act (WFRHBA) on December 18, 1971.

My comment on this "recommendation" simply is ... once a wild horse territory, always a wild horse territory. Please stop ignoring the spirit of the law.

Who cares if an historical precedent exists for the current population? At least fossil evidence shows that horses evolved on this continent (and in the Southwest too!). All cattle were brought here from Europe by the original colonists-that is an historical fact.

#### General Comments on the Overall Heber Wild Horse Territory Plan

In general, the plan proposes many scientifically sound actions that are beneficial to the flora and fauna of the territory and I commend you for the thoroughness of your research.

However, simply reducing the number of livestock permitted to graze probably would allow nature to restore itself over a few years and only cost the taxpayers whatever amount would be lost as a result of lost permit revenues.

Sometimes farmers just have to plant cover crops and let their fields lie fallow for a year....Mother Nature is a good healer.

Thank you sincerely for considering my comments.