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Comments: Dear Forest Service,

Regarding the Heber Wild Horse Territory Plan, below are my comments.

First, however, I would like to ask each member of the Forest Service involved in this issue where exactly their loyalties truly lie, within each person's heart. Is your loyalty to the cattle industry? The sheep industry? Aligned with the BLM? To preserve the natural beauty and importance of the wild horses (and burros if applicable)? To find a solution that honors the wild horses/burros?

There are protections at the federal level for the wild horses and burros that began in 1971 with the Wild Free Roaming Horses and burros Act of 1971. Additionally, the National Environmental Protection Act and the Administrative Procedures Act. These laws set forth protections for the wild horses and burros. Apparently, the BLM and the Forest Service do not feel compelled to comply with these regulations.

As I see it there are three main issues: One, the cattle and sheep industry have somehow been allowed by the government to illegally take land that was legally allotted to the wild horses and burros. Illegal fences have been constructed, water has been taken away from the horses and burros so the cows/sheep could use it, and forage has been destroyed by the cows/sheep. So, the BLM and FS say there are too many horses/burros for the land they're on - well, of course! That's because the legally allotted amount of land has been taken from the horses and given to the cattle & sheep. Second, nobody seems to believe or understand that having natural predators and letting Mother Nature determine appropriate population levels is the correct way to handle the perceived "overpopulation." So, natural predators have been destroyed (presumably so cattle & sheep are protected) and the BLM and FS think that rounding up horses and using birth control are what they should do to "manage" wild horse/burro populations. Third, ecologists have proven that cattle/sheep destroy forage and the land, whereas horses and burros contribute back to the land. They do this by passing the seeds of what they eat through their manure back into the soil to grow more forage. Sounds like a great process to me in supporting the environment and sustainability. Wild horses/burros have also been proven to be great at forest fire prevention and control. Why are the BLM and FS not considering these excellent benefits of the wild horses/burros?

In my opinion, if the BLM and FS would give the wild horses/burros back their legally protected land and stop killing natural predators, Mother Nature would do a very fine job of controlling populations and maintain genetically viable herds. In other words, follow the law and get out of the way!

As it specifically relates to the FS plan for the Heber wild horses:

- 1) It is illegal for the FS to remove any wild horses until they are proven "excess" - managing by setting an arbitrary number of horses is not in compliance with the law's definition of "excess"
- 2) There should be no defining boundary fence for the Heber Territory - horses can continue to move to/from the boundaries of the Heber Territory onto adjacent US FS lands on the Black Mesa District as horses were here prior to 1971 and should be able to use this area
- 3) I DO NOT SUPPORT any form of birth control - the most common control is PZP, which is an endocrine disrupter and causes permanent sterility within four years. Not only that, birth control methods severely stress the mares and stallions - they understand breeding, not why they cannot make foals.
- 4) Roundups and birth control greatly increase the chance of inbreeding and eventually eliminates genetic viability. As I stated above, give the legally allotted land back to the wild horses/burros, put back the natural predators and get out of the way!
- 5) Wild horses/burros have a RIGHT to their territory whereas livestock only have a PRIVILEGE.

I hope the FS equitably considers all of the comments it receives and comes up with a plan that truly benefits the wild horses/burros.

Respectfully,

Lorraine P. Cruz