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Comments: It is an historical fact that ranchers have held BLM & Forest Service in their pockets. Ranchers of today pay a pittance in fees to graze their cattle on "public lands", leaving the land in poorer condition than when the cattle are put out on it. Not just the land but fencing abounds that is not held in repair, strands of barbed wire left for wildlife to be entangled and die a horrible death, eaten alive by natural predators because they cannot get away. I, as many others have, on my adventures into our public lands have retrieved lengths of discarded barbed wire left by so called "stewards of the land". These ranchers are now known as "welfare ranchers" and they have taken advantage of our public lands and I am tired of this. They are given more rights to public land than the wildlife and that is not right.

Forest Service Department, it is your motto is "Caring for the land and serving people", not just ranchers.

To quote an article from the Western Watershed Project, "The cost of public lands ranching to American taxpayers is enormous. The current public land grazing fee of \$1.35 per month for one cow and her calf is woefully below market value. Direct government expenditures to administer public land grazing constitute an annual net loss to the taxpayers of at least \$123 million and more than \$500 million when indirect costs are accounted for. As much as 96% of these public dollars are spent to enhance livestock production in direct conflict with legal mandates to restore the health of public lands.

For all of this public expense, public lands ranching fails to demonstrate any significant economic contributions to rural economies. Hobby ranchers and corporate-entities hold the lion's share of grazing permits on hundreds of millions of acres of public lands. Most of the rest of public land ranchers rely on service jobs in small towns as their primary source of income. Rural communities support public land ranchers not the other way around". It is time to put wildlife and public lands first in all considerations.

(1) The Wild Free-Roaming Horses and Burros Act was signed into law by President Richard M. Nixon on December 18, 1971. According to the law the boundaries of the Heber Wild Horse Territory were to include all areas where free-roaming horses were found in 1971. The boundaries were also to include migratory patterns and the habitat needs of the wild horses. We know those boundary requirements were not included in the Heber Wild Horse Territory.

I ask the Forest Service to provide the information they used to determine how and why the Heber Wild Horse Territory was set up the way it was and ask the Forest Service to produce any and all scientific studies and surveys and other assessments that were used in how they determined the boundaries of the HWHT.

(2) I respectfully ask Forest Service to do a thorough Environmental Analysis of the forest that includes all wild species and domestic cattle.

(3) The Forest Service is proposing that the forest supervisor will be the only person to decide the fate of the Heber wild horses and their territory. I object to any one individual being given complete power and authority over what happens to the Heber wild horse herd and their habitat.

This plan, put out by the Forest Service is either a deliberate plan for the extinction of the Heber herd or it comes from people who just do not understand wild horse issues.

One government official should not be in the position to make such an important and broad decision on the fate of a federally protected wild horse herd. This decision should require checks and balances with a FAIR board of people which would include people who are knowledgeable about wild horses and specifically the Heber wild horse herd.

A quote by Craig C. Downer, Wildlife Ecologist,

"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. 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".

NEPA requires that the USFS adequately evaluate all potential environmental impacts of proposed actions. To meet this obligation, the USFS must identify and disclose to the public all foreseeable impacts of the proposed action, including direct, indirect, and cumulative impacts. ?????????

I request that any NEPA analysis of this proposed action include but not be limited to a thorough consideration of the following significant impacts of this action: ??

(1) Impacts on the genetic viability of the Heber wild horse population. ? ?

(2) The social, behavioral and physiological impacts of the stress of capture and captivity on wild horses. ?  
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(3) Require the Forest Service to provide scientific data that shows there is an overpopulation of horses in the Heber herd. They have provided no scientific data only an arbitrary and capricious appropriate management level (AML) of 50-104 horses which is genetically non-viable. Make no mistake, this is a plan for the extinction of the Heber herd.