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Comments: I am responding to the request for public comments on the U.S. Forest Service (USFS) proposed management plan for the Heber wild horse herd.

Wild horses are an essential part of the ecosystem and keep our lands healthy and help in preventing wildfires. They were granted their land in the 1971 Wild Free Roaming Horse & Burro Act (WFRHB) and they have a legal place on our public lands.

Wild horses are a part of our Western Heritage and should not be removed from their designated lands. They enrich the lives of the American people and are popular tourist attractions. If these symbols of freedom and pride are decimated leaving them in such low numbers that they are no longer a viable species they will perish from our land. Our wild horses belong on our public lands not locked away in government holding facilities.

I have the following comments and concerns:

Under the law in the WFRHB mandated that wild horses get principle use of areas they were found in 1971. Therefore it allows that some livestock decreases may be necessary in order to achieve that goal. However this consideration appears not to be included in the scope of the Heber wild horse management plan.

In order to achieve other mandates contained in the WFRHB such as preserving a self-sustaining herd as an integral part of the lands, the outdated Forest Service Plan should be revised to reflect a plan for the horses that includes an AML that is viable for a self-sustaining herd (150 - 200 horses should be the Low-end AML for that). The USFS plan however reveals it is the agency's goal of establishing an AML of just 50-104 wild horses for the Heber Territory.

An EIS must be done for any herd management plan to be meaningful and must be done for a plan implemented on land considered "Special Areas" in the National Forest System designated for their unique or special characteristics.

The court ruled that the USFS was to meet and develop the Heber wild horse management plan with a party to the lawsuit. The USFS did include one member in their meeting that was a party to the lawsuit but she was removed when she attempted to submit comments to the final recommendations that were to be submitted to the USFS, thereby violating the court order. The working group and all recommendations therefrom need to be disregarded and dismissed from the HMAP and all future plans or proposed actions as they are not in compliance with the court order.

In addition the working group did not meet in public, would not allow members of the public to attend or call in on phone meetings and did not keep recordings or minutes of the meeting thus violating the open meetings laws they were required to follow. For this reason too the working group and all recommendations thereof should be dismissed from this HMAP and all future documents and proposed plans/actions.

The USFS and several members of the local community acknowledge the horses have always roamed between the "territory" and the Reservation and the courts ruled the horses are one-in-the-same, yet the USFS failed to include the migratory land between the "territory" and the reservation in the territory historically used in 1971 and prior in the lines drawn for the Heber Wild Horse Territory. This again directly contradicts the mandate of the 1971 WFRHB act to establish areas "where horses currently are." Because of this most of the horses in this historical migratory land are left out. The USFS must expand the territory to include those lands used since before 1971.

The USFS claims there are 500 horses in the Apache-Sitgreaves, on and off the territory. Citizens Against Equine Slaughter has had several volunteers on the ground in the territory, documenting and reporting on the horses, individual bands, births, and deaths. They have been documenting the herd for decades and their count is closer to 240 horses. How do you account for such a drastic difference in your number? Citizens Against Equine Slaughter has people who are out there every day and can provide photographic proof of the horses of their numbers. What are USFS numbers based on?

Citizens Against Equine Slaughter believes the current population to be approximately 200 horses and given all the recent horse deaths from shootings and predation of foals there is no need at this time to remove any further horses from the territory as 150-200 horses would already be considered the low end of the AML. USFS last census data was from 2017 and does not address these deaths and their effect on the population.

Fences on the existing territory are an issue. Livestock fencing creates a situation where the horses cannot live easily or roam-freely, thus changing their free-roaming behaviors and is an issue that cannot be ignored. Livestock permittees must follow grazing regulations and must not impede the movement of the horses, including movement to different water sources on the territory during drought.

USFS has also not addressed the issue of repeated complaints of horses being chased, stolen, shot, or lured with feed, salt or water to be in or near roads. Until USFS can fulfill these basic requirements responsible of wild horse management this plan is not a plan to protect the Heber wild horses but instead a plan that will cause harm or death to the horses in the herd. The USFS must ensure in this HMAP or in an EIS, that these horses are going to be managed for the protection of the herd and not for the benefit of the livestock owners.

The law requires public lands to be managed for multiple-use. The WFRHB act requires their designated areas to be managed principally for horses. That is not the case here where it is the livestock that are getting principle use. The horses are not even getting an equal treatment in their designated area which again is in opposition to court rulings.

I strongly oppose the use of GonaCon as a contraceptive. GonaCon is hormonal and therefore changes mare behavior and band dynamics. This is in opposition to the mandates of the 1971 wild free-roaming horses and burros act.

PZP should only be considered as a tool if the population is ever actually over what the range can support. That is an actual AML that has been scientifically determined utilizing facts and experts NOT the guesswork and speculative AML you have suggested in the HMAP.

Castration of stallions should not be an option as it has been proven it does not work if the goal is population reduction.

Sterilization of mares should also not be listed as a tool. It is inhumane and unacceptable to the public and has been litigated and shot down every time it has been included in a management plan for wild horses. It is considered experimental on wild animals and can only be done following AWA regulations for experimenting on wildlife. Those regulations require surgical procedures to be done in a sterile environment which can never be achieved in the field or in holding facilities or corrals. To suggest its use on wild horse mares is to condone gross malpractice and cruelty.

Helicopter roundups should never be used on the Heber wild horses or any other wild horse herd. This approach is wrong not only for the horses but for other animals that live in the area, a few species of which are critical or endangered and require other levels of federal protections.

The USFS response to local ranchers who graze livestock in the Forest and who increasingly pressure the USFS for the removal of the Heber wild horses has been disgraceful. In 2020 15 Heber wild horses, two entire families, were found shot to death in the forest. And over the past 2 years two dozen Heber horses have died after being gunned down by an unknown perpetrator(s). To date no arrests or serious investigations have been made into these crimes.

Now this plan reveals the USFS goal of establishing an AML of just 50-104 wild horses for the Heber Territory. Given that the most current "official" census available is from 2017 using population estimates from Citizens Against Equine Slaughter of 200 horses this action would reduce the herd size below viability and as the USFS does not have an adoption program, it would seal the fate of those captured and funnel them directly into the slaughter pipeline.

This is not responsible management of this herd. The USFS has been charged with managing the Forest for all the people of the United States not just the cattlemen but this proposal is driving the Heber wild horses from the very land that was granted to them in 1971 and into extinction to satisfy the demands of cattlemen for ever more of our public lands for their use.

Please review and consider my comments above and work with all stakeholders involved including wild horse protection groups and the public and not just the cattle industry to devise a responsible, humane plan to manage the Heber wild horses on the land they were given by law in 1971 and occupied long before that.

Thank you.

Colleen Morrison