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Organization:

Title:

Comments: I am a Montana resident and began a journey of photographing the Pryor Mountain Wild Horses. By far in my life since 2015, my greatest emotional challenge and love affair is as advocate for saving our iconic and native Wild Horses in ten western states from slaughter and ultimate extinction by the BLM. The advocacy work is a tireless review of BLM environmental assessments and writing intelligent comment letters supported by documentation not just emotions.

With regard to the USFS scoping notice for the Proposed Management Plan (hereinafter referred to as "the Plan") for the Heber Wild Horse Territory, I submit the following comments. As a member of the general public, I appreciate the Heber Wild Horses and what they stand for although never visited and photographed them. Spending time photographing the Pryor Herd in Montana and camping on the range provides me with peaceful enjoyment and great appreciation of our public wilderness lands which cannot be taken for granted. There is nothing more breath taking than seeing a new born foal within an hour of its birth or seeing the herd run by you on the open landscape just to run for the sake of running. Below are issues that the Plan must address:

*AML and Forage Allocation: The Appropriate Management Level (AML) must be in conformance with the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA). To meet the minimum standard for a genetically viable herd, AML should be at least 150 horses (in order to have 50 effective breeding animals). Forage allocation within the Heber Wild Horse Territory must be designated "principally but not necessarily exclusively to wild horses" as outlined in the 1971 Act (WFRHBA). At minimum, the Heber Herd should be allocated 50% of the forage in their own dedicated Territory. Legal reduction of private/corporate domestic livestock grazing in the HMA/territory, pursuant to 3 C.F.R. 4710.3-2 and 43 C.F.R. 4710.5(a), in order to accommodate the current Wild Horse population level is required. The USFS authority to reduce livestock grazing pursuant to 43 C.F.R. 4710.5 in order "to provide habitat for wild horses or burros" is also required.

*Natural Behaviors: The Plan must prioritize preserving natural wild horse behaviors. As the National Academy of Sciences determined "preserving natural behaviors is an important criterion" for Wild Horse management. The Plan should be precluded from management actions such as sex ratio skewing which causes stallion aggression due to the unnatural ratio of males to females; castration, ovariectomy and other surgical sterilization, otherwise considered barbaric "in the field" inhumane treatment of animals that alters the animal's ability to produce natural hormones; and any fertility control that alters the production of natural hormones. Use of PZP can control and reduce natural attrition.

*Fencing: The USFS pasture fence/horse observation map provided shows that fencing is impeding horses from fully utilizing much of the Territory. Any fencing within the Territory that prevents free movement must be removed. This is inhumane, wrong, and not in conformance with Congress' intent.

*Boundaries: Based on historic information, it appears the Territory boundary was incorrectly drawn and adjacent lands that have been seasonally used by Wild Horses for decades were omitted from the Territory boundary. The Plan must address seasonal movement of the horses and make a recommendation that the boundary be redrawn to be in conformance with historic Wild Horse usage and the animals' need to have access to suitable habitat throughout the year. All source documents regarding historic horse use should be included in the Plan's appendix.

*Census: Conduct and detail census information, both actual counts and projected population numbers, including information about the data on which population projections/estimates are based.

In 1971, Congress unanimously passed the WFRHBA because Americans care about our Wild Horses and Burros. That has not changed in 50 years. Americans still overwhelmingly care what happens and detest the treatment bestowed upon them.

I haven't heard anything more fitting for what is currently happening to our beloved native Wild Horses & Burros by the BLM & USFS. Every individual, who by the way "Man or Woman" is considered a "hominid" species:

"[T]he ESA hardly poses a threat to the American way of life. The greater threat sad to say comes from the human-caused mass extinction of species currently occurring throughout the world. We need to become better species." (emphasis added). American Bar Association, Endangered Species Act: Law, Policy, and Perspectives, Chapter 8, Page 152.

Thank you for your time and respectful consideration of all of the comments received. I do pray to the Lord every day that Wild Horse advocates' prayers and Voices are heard.

Advanced Certified Paralegal
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