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Comments: Here are my comments for your proposed Heber Wild Horse Territory Plan:

Your claim the purpose for the project is "to ensure the herd is managed to maintain a self-sustaining population of healthy animals within the designated territory, in a thriving natural ecological balance with other uses and the productive capacity of their habitat." However, your plan is basically a way for the FS to overly manage the wild horses so that they will not be self-sustaining on their own.

Looking at your maps, there are grazing allotments that take up half of the boundary with lots of fences which make it impossible for the wild horses to be able to use more of their designated territory. The main reason our wild horses are being removed from our public lands is because of the invasive ranching industry. I think these allotments should be retired so that the wild horses do not have to be removed with only a very low number allowed to remain. The wild horses have a right to their territory, the livestock are the invasive species who are allowed to eat up the grass for pennies on the dollar.

There is no reason for more fences to define the Heber Territory. The horses should be allowed to move freely from the boundaries of the Heber Territory onto adjacent US Forest Service lands on the Black Mesa Ranger District (BMRD). Horses who were on the BMRD prior to 1971 should be able to continue to use this area.

I don't agree with managing by setting supposedly appropriate management levels as it is illegal and not in compliance with the definition of excess. The FS cannot set arbitrary numbers (which again, is illegal) of horses in the territory and your proposed level of only 50-104 horses is extremely low.

Your plan is full of plans for captures, so obviously you think that rounding them up will be necessary. However, legally you have to prove there is an excess and to do that, monitoring studies must be created fairly to determine who, if anyone, is damage to the habitat. Why is it that when it comes to wild horses, the agencies involved completely ignore it? The only way I would agree to removing any horses, would be if a great many were no longer healthy and then only be removed by baiting and as few as possible. I would hope that any horses removed would be available for adoption or sent to sanctuaries and not forced into govt. holding pens for the rest of their lives and especially, not sent to slaughter. The holding pens don't have a very good reputation as being healthy places for the horses.

It's so frustrating that the FS and BLM refuse to listen to science and facts. The International Society for the Protections of Mustangs and Burros (ISPMB) has extensive knowledge on wild horse populations and their reproductive rate. The herds that they have studied, that have not been continually rounded up, reproduce way more slowly than the herds constantly rounded up by the BLM. When herds are disrupted, they are no longer able to pass down knowledge to the younger generation which is vital to keeping the younger animals from overly reproducing too soon.

Your heavy handed plan wants to skew male to female ratios and use PZP, a pesticide that renders mares sterile in four years. The sterility issue is not even mentioned in your pros and cons section. When mares are no longer fertile, they no longer serve their purpose in the herd and the herd dynamic is no longer intact. ISPMB has observed that mares who have been given PZP will steal other mares' foals because they are so desperate to have a foal of their own. This is a disaster as the foals starve to death since the PZP'd mare has no milk for them. This is a fact, yet no one in our govt. will listen.

In closing, I think your plan is to ensure that the Heber wild horses are overly managed to the point that they will

never have a sufficient number to remain healthy without human intervention, which would not be needed if humans would allow the horses to manage themselves. If your ALM wasn't so low, there would be no need to have to bring in young horses from other areas if the horses are inbreeding. Think about it!!! I think the fewer fences the better but at the very least, I agree with your plans to make the fences that are there more horse/wild animal friendly so they can move through them easier.

As a side note, there have been 31 Heber horses shot which does not bode well for their population if only 50 are allowed to remain. Why isn't the FS doing everything it can to find out who is behind this slaughter? I don't believe the FS has the wild horses' best interests at heart and that makes me very sad.

For the wild horses!