

Data Submitted (UTC 11): 3/16/2020 5:47:23 AM

First name: Roger

Last name: Owens

Organization:

Title:

Comments: The current horse population is comprised totally of feral animals. To quote directly from the USFS study:

"All interviewees with knowledge claim the resultant herd(s) today are horses that have passed from the Fort Apache Reservation to the Forest and Territory. None of the horses are from the original designated herd... As such, this study concludes that there is no historical precedent for the current population occupying the area." According to the Wild and Free-Roaming Horses and Burros Act of 1971, "wild horse" is a legal status provided to "horses and their progeny that were considered wild and free roaming at the time of the passage" of the Act. (36 C.F.R. 222.60 (b)(13)). Further, "any horse introduced onto federal lands including National Forest System lands on or after Dec. 15, 1971, by accident, negligence or willful disregard of private ownership is not considered a wild horse. Such horses are defined as unauthorized livestock. Unauthorized livestock does not have the status of a wild horse under the Act" (36 C.F.R. 262.10) In addition, "Unauthorized livestock is subject to gather under Federal and State law."

The horse herd was nonexistent before the Rodeo Chediski fire. The present herd is an invasive, non-native species that is devastating the historical ecological balance of the forest. The horses have almost totally displaced the elk herd south of Hwy 260, have decimated the turkey population and are damaging the critical habitat of various endangered species. There is a stark contrast in the available forage on the north side of Hwy 260 as compared to the south side, which can only be attributed to overgrazing by the horses. The area that comprises the Heber Wild Horse Territory was never intended to be for the exclusive use of horses to the detriment of all other species. It was meant for the preservation of true wild horses which do not exist today. If you give these non-native, invasive creatures standing as anything other than feral livestock, you are on the path to condemning the area to becoming a wild horse park. Wild horse advocates will immediately argue the proposed population numbers are not a minimum viable population and will demand the numbers be raised. The proposal has no clear path to controlling the herd by reducing the horse population by even one animal, ever. It is not based on science; rather it has a foundation of baseless romanticism and groveling to the bully pulpit of the wild horse advocates. No other feral, non-native invasive species would ever be accorded the same deference. The proposed action is not sustainable without the infusion of millions of dollars to maintain the feral herd, money that would be much better spent on true wildlife management. If you give the horses any standing other than their true designation of feral livestock, you are dooming the forest I have lived in and loved for the past 63 years to becoming something I (nor any rational human being) would have never imagined just 20 short years ago, when the horse population was zero.