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Comments: As a wild horse and burro advocate and a taxpaying American citizen who has a stake in the sound management of OUR public lands and the protection and preservation of OUR endangered wild horses currently being managed by the USDA's Forest Service (FS), I am submitting my comments on the Heber Wild Horse Territory Plan #18916.

The Plan from the Apache-Sitgreaves National Forests proposes a huge reduction in the Heber Wild Horse herd from the "guesstimated" 292-471 mustangs to no more than a genetically nonviable population of 50-104 individuals who would be confined to a scant 21 square mile area, the current boundary arbitrarily set by the agency.

The Heber Wild Horse Territory is approximately 19,700 acres, yet the USFS seeks to remove most of the wild horses, one of the last herds that have been unmanaged, from their legal herd area on our public lands, maintaining a tiny population of 50-104 individuals on a limited range of 21 square miles while allowing livestock grazing in the same area.

The Heber Wild Horse Territory is the legal habitat of a wild horse herd that dates back to the battles between early settlers and Native Americans, who rounded up wild horses since before Europeans invaded America, and, as such, are protected under the Wild Free-Roaming Horses and Burros Act of 1971, despite FS claims that they are "feral" animals from nearby tribal land following the Rodeo Chediski Fire in 2002.

For hundreds of years, wild horses have roamed the Mogollon Rim Country in Arizona. Evidence indicates ancestors of today's Heber Wild Horses were of Spanish stock brought by the Coronado Expedition in 1540 and then again by Father Eusebio Kino in 1653.

Since then, these wild horses have roamed freely and given birth to wild foals. How long must this circle of life continue before the FS stops calling them "feral" as if they just escaped from someone's backyard last week? The Heber mustangs are unbranded, free and WILD -- NOT "feral"!

In fact, it is, no doubt, due to the agency's insistence in labeling these mustangs "feral" that the locals have decided to take "management" matters into their own hands by eliminating them from the area through violent methods, namely gunfire. In the last couple of years, a shocking 26 of these protected wild horses have been shot dead since October 2018! Many have also been stolen by thieves who have been illegally capturing and removing these wild horses in recent years.

This lack of respect for a protected species comes as no surprise since the Heber Wild Horse Collaborative Working Group (facilitated by Southwest Decision Resources and Arizona State University School of Sustainability) that the USFS so proudly worked with for 15 months assuring it "included wild horse advocates; ranchers; wildlife managers; and professionals in equine recreation; training; range science and veterinary medicine" with "feedback from Arizona state agencies such as Arizona Game and Fish Department and Arizona Department of Agriculture", apparently wholeheartedly supported culling (KILLING) the herd. Apparently, the sole member of this group who actually advocated for the protection and preservation of the wild horses and was the only member with any actual knowledge of the Heber herd or the Sitgreaves National Forest where they live, was fired for not falling in line with the majority who wanted to lethally remove them from their rightful range. Ironically, this one woman represented the 80% of Americans, including myself, who highly value OUR wild horses and demand their presence on OUR public lands. Congress agreed with this view when they UNANIMOUSLY passed the Wild Free-Roaming Horses and Burros Act nearly 50 years ago. The Forest Service, along with the biased members of the Collaborative Working Group, are woefully out of touch with the will of the MAJORITY of the

American public on the issue of the protection of this "fast disappearing" heritage species and their rightful range.

The Sitgreaves national forest is one of the most heavily logged, grazed and roaded forests in the southwest Region of the U.S. Forest Service (Arizona and New Mexico), with less old growth, fewer roadless areas, and fewer wilderness areas than the other 11 forests. Virtually every acre within the Rodeo-Chediski fire area was intensively logged, grazed, and roaded. In just the past 13 years, the FS conducted 10 timber sales within its portion of the fire area. Forest Service employees and the Arizona Game and Fish Department repeatedly warned that the logging levels on the Apache-Sitgreaves were unsustainable and Game and Fish even appealed the Forest Plan. Myriad Forest Service studies in the 1990's warned that overgrazing by livestock within the fire area was causing dangerous fuel loads by allowing large numbers of small pine trees to take root.

Apparently, FS has been fighting to remove the Heber Wild Horses from the area since 2005, but has been under a court order prohibiting such an action until a management plan is completed.

I strongly oppose any and all plans to roundup, remove, sterilize or otherwise disturb the Heber Wild Horses or their habitat, this includes shrinking their territory.

I urge FS to include detailed information addressing impacts and alternatives to the proposed action in the EA:

Considering the small size of the Heber Wild Horse Territory, I suggest reducing cattle grazing, or better yet, eliminating it altogether by excluding cattle allotments in the area to ensure the mustangs are managed as the principal users of their own habitat to avoid competition over forage since they are a protected species and livestock is not.

This plan seems to be about updating cattle grazing regulations, not what is best for the Heber mustangs.

Cattle originated in rainy climates in Europe, therefore being unsuited to the dry, often hot, climate of our west, tend to gather near riparian areas where they cause great damage, unlike wild horses who drink and then move on. more frequent.

A serious analysis of the difference of impacts between beneficial NATIVE wild horses and destructive, INVASIVE cattle seems to be in order to prove once and for all who the culprits of range degradation truly are.

The invasive fencing in the Heber Wild Horse Territory is blocking freedom of movement, impeding the mustangs from accessing much of their habitat. Such barricades harm the horses from forage access and traps them during weather challenges such as drought and bad winters, endangering their lives. Half of the Pryor Mountain mustangs perished in 1977 due to such negligence. Allowing such life-threatening obstacles in herd areas in cruel, deadly and flies in the face of Congress' intent to protect these national treasures from harm and death.

Wild equine genetic expert Gus Cothran, states that wild horse numbers must never be reduced to levels below the minimal population level of 150-200 effective adult breeders of standard reproductive age (not counting foals, yearlings or bachelors) that is necessary for long-term genetic viability and the preservation of healthy, self-sustaining wild horse populations. Furthermore, the 1971 Act clearly states that wild horses "shall be managed as self-sustaining populations." This Plan defies science and the Law. The AML ("arbitrary" management level) must conform with the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA). Even the BLM Handbook recommends this in order to maintain a reasonable level of genetic diversity.

Shockingly, the AMLs of 83% of wild horse herds and 90% of wild burro herds across the west are being managed at levels below genetic viability contrary to the minimum-viable population (MVP) guidelines deemed necessary for the survival of the species.

FS cannot remove any wild horses unless they can prove an "excess" by the law. Clearly this is not the case. In fact, the National Academy of Sciences found NO OVERPOPULATION of wild horses and burros on our public lands while finding the method of "guesstimating" herd numbers by agencies charged with managing our wild equines to be highly suspect and not scientifically based. It is imperative to protect the genetics of this unique herd by managing them at sustainable numbers. Perhaps an independent survey should be conducted along with an examination of data to ensure the genetic diversity of the bands and families in this herd is not being compromised by reckless management that is leaving populations too low to survive.

In light of the dwindling population of the Heber Wild Horses, it seems raising the AML should be considered, as well as increasing their range, which can be accomplished by fence removal and livestock reduction/removal. As a protected species, it is more important to protect them than to elevate commercial interests in the area. Tourism by nature enthusiasts seeking to view the wild horses surely bring economic benefits to the local communities. Of course, to attract more tourist and visitors, it would make sense to ensure public safety by making a serious commitment to find and prosecute those responsible for the killing of more than two dozen mustangs, horrific crimes that have yet to be solved.

The lackluster "investigation" of the recent shootings of the Heber mustangs by authorities who have displayed an utter lack of concern or will to find the cold-blooded killers of these innocent, defenseless animals. One wonders if the general consensus among those charged with the protection of the Heber Wild Horses is the only good wild horse is a dead one. The indifference to this ongoing atrocity against the Heber herd is shameful and implies complicit or, at the very least, consent to this sickening bloodbath.

It is puzzling that at a time when the Heber Wild Horses are being systematically wiped out, FS is proposing a plan that would further diminish their plummeting numbers, when the agency should be discussing how better to protect them and their habitat from obliteration.

It would be encouraging if FS would display the same support they obviously have for commercial uses of the herd area (livestock grazing, logging, etc.) for the wild horses they have been mandated by LAW to protect. The (mis)use of our public lands by special interests is a privilege -- not a right.

The fate of the Heber Wild Horses who are removed from the range after being deemed "excess" often ends in death. This includes old, sick or lame animals whose protections end when they are "euthanized". Healthy animals over 10 are offered for sale without limitation (music to a kill buyers ears), which culminates in a one-way trip to the abattoir. No protections from the knacker. Once sold, any protections once enjoyed end. If not sold, they are "humanely destroyed" (?).

If a healthy animal is under 10 years old they are offered for adoption up to 3 times. If offered through online adoption, it still counts against the horse, if not adopted, and they can then be sold without limitation. Many horses are moved quickly and disposed of in this manner courtesy of kill buyers. If not sold these once-protected and cherished horses are unceremoniously destroyed, no longer protected by the Act. This is barbaric in the extreme and underlines the serious dangers wild horses face whenever a roundup and removal operation is conducted. Therefore, it is of paramount importance that OUR iconic mustangs be managed, HUMANELY and ON THE RANGE, WHERE THEY RIGHTFULLY AND LEGALLY BELONG -- on OUR public lands.

There must be NO roundups. NO removals. NO sales without limitations to kill buyers, NO slaughter or unjustified "euthanasia", NO interfering with natural, free-roaming wild behaviors via sex ratio skewing, castrations, ovariectomies or the use of risky pesticides like PZP, GonaCon or other fertility control, which alters production of natural hormones and can permanently sterilize mares within 4 years of use. Remember that NAS determined "preserving natural behaviors is an important criterion" for wild horse management.

The Wild Free-Roaming Horses and Burros Act clearly states:

CONGRESS FINDS AND DECLARES THAT WILD FREE-ROAMING HORSES AND BURROS ARE LIVING SYMBOLS OF THE HISTORIC AND PIONEER SPIRIT OF THE WEST; THAT THEY CONTRIBUTE TO THE DIVERSITY OF LIFE FORMS WITHIN THE NATION AND ENRICH THE LIVES OF THE AMERICAN PEOPLE; AND THAT THESE HORSES AND BURROS ARE FAST DISAPPEARING FROM THE AMERICAN SCENE. IT IS THE POLICY OF CONGRESS THAT WILD FREE-ROAMING HORSES AND BURROS SHALL BE PROTECTED FROM CAPTURE, BRANDING, HARASSMENT, OR DEATH; AND TO ACCOMPLISH THIS THEY ARE TO BE CONSIDERED IN THE AREA WHERE PRESENTLY FOUND, AS AN INTEGRAL PART OF THE NATURAL SYSTEM OF THE PUBLIC LANDS.

NOWHERE in the 1971 Act have such horrific "management" policies as those currently employed or the Mengele-like experiments such as those the agency currently seeks to conduct on our wild equines EVER been authorized. In fact, the Act states quite plainly that federally-protected wild horses and burros are to be managed PRINCIPALLY where they found (ON THEIR RANGE!) and that any other multiple use of their legally designated habitat on our public lands must not interfere with the natural WILD FREE-ROAMING BEHAVIORS of these protected animals nor can such behaviors be altered in any way, chemically or surgically. What part of this mandate does this agency not understand? How does any agency mandated to PROTECT America's wild horses misinterpret such a mandate for a wrongly presumed authorization to round up-remove-sterilize-mutilate-annihilate into oblivion a cherished iconic species that helped build this nation?

Management "tools" of this barbaric nature will only guarantee the extinction of the Heber Wild Horse herd. This cannot happen.

HUMANE management of our wild equine herds is the only path forward for the Heber herd and ALL of OUR wild horses and burros on OUR public lands.

I call on the FS to consider this and I urge that the following also be included in the EA:

The Forest Service must provide the information they used to determine how and why the Heber Wild Horse Territory was set up as it was.

They must produce any and all scientific studies and surveys and other assessments they used to determine the boundaries of the HWHT.

The Forest Service must do a thorough Environmental Analysis of the forest that includes all wild species and domestic cattle.

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 LEGAL territory. The fate of the Heber Wild Horse herd must NOT be decided by a single person. No individual should have that kind of power, especially when the lives of OUR wild horses, who belong to ALL OF US AND TO FUTURE GENERATIONS are at stake.