Data Submitted (UTC 11): 3/17/2020 12:45:36 AM
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Comments: I submit these comments in response to the USFS scoping notice for the Heber Wild Horse Territory Management Plan.
The conclusion that the 2016 and 2017 ethnographic study provided no historical precedent for the current herd occupying the area seems flawed. It is based on here say and speculation, none of which is adequately substantiated. The credentials of these individuals are not given. Therefore, there is no proof that their statements are correct. An objective statement would be that the current herd may or may not be from the original designated herd.
There is no legitimate historical precedent for 60 percent of the Black Canyon allotment and six percent of the Heber allotment to overlap with the Heber Wild Horse Territory. The wild horses are entitled to all of their lawfully designated territory. The AML should be based on the use of the whole territory and not reduced to accommodate livestock grazing. Fencing should be removed and horses should have access to suitable habitat throughout the year.
The WFRHBA protects wild horses and burros from capture, branding, harassment or death. It also mandates that they should be managed in a minimally intrusive manner that preserves their wildness. Sex ratio skewing, castration, ovariectomy and hormonal altering fertility control violate both of these mandates and regulation 43 C.F.R. § 4700.0-6(a), which states that activities affecting wild horses and burros shall be undertaken with the goal of maintaining free-roaming behavior.
I urge you to confirm the current population using photo mark-capture before the next census.
Finally, all source documents regarding historic horse use should be included in the Management Plan appendix. In a democracy, all voices must be heard. Citizens foot the bills and should have as much consideration as those interests that use our public lands for personal profit.