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Comments:
As a private owner of acreage in Navajo county and a citizen owner and majority stake holder of the PUBLIC LANDS, I have serious reservations about multiple aspects of the proposed management plan for the Heber Wild Horse Territory.

The Heber Wild Horse Territory was established in 1974 and, as mandated under the '71 Wild Horse & Burro Act, was to include areas "where horses currently are." The law also mandated that wild horses get principle use of areas where they were found in 1971. Since the Heber Territory overlays two permitted allotments, why does the proposed management plan advocate reduction of horse numbers rather than removing PRIVATELY OWNED livestock to promote range sustainability on the PUBLIC LAND?

The Forest Service fails to document their assertion that there are an estimated 500 horses currently ranging across the Territory; a previous aerial survey counted far fewer horses. With no accurate herd numbers, on what basis does FS attribute the deterioration in range condition to the wild horse population? The stated goal of the plan is to reduce the Heber wild horse population to an AML of 100, or fewer than one horse per 1900 acres. I know of no rangeland in AZ with a carrying capacity/stocking rate of 1AU/1900 acres. Also, FS cites severe shortage of forage following the Rodeo-Chediski fire and recent drought as justification to reduce herd numbers. If, after severely restricting livestock grazing on the Black Canyon and Heber allotments, the range condition fails to improve, I suggest adding to the HMA comparable acreage from the migratory area between the Heber Territory and the Reservation, which the horses have historically used. There must be an EIS completed for the Heber Wild Horse Territory before a management plan can advocate for such a large wild horse herd reduction.

Also, the issue of fencing in the Heber Territory must be addressed. Unlike cattle, horses "roam" for forage and water. Livestock fencing crisscrossing the Territory limits free-roaming behaviors and can restrict access to water. Under current long-term drought conditions, free access to water is an imperative.

Current field studies estimate the Heber wild horse population at 240 horses; a population of fewer than 100 horses is not genetically sustainable. If, after an accurate herd count, an EIS and a sustainable carrying capacity is determined for the Territory (sans PRIVATELY OWNED livestock), then sustainable herd numbers can be achieved through humane and safe birth control such as PZP. NO field spaying or gelding. (I have a background in veterinary medicine.) And NO hundred plus horse roundups.

Over 30 Heber wild horses have been shot by an unknown individual(s). This is illegal under the WH&B Act and the perpetrator is subject to prison time. Yet this plan fails to proffer a solution for the continued shooting, harassment, rustling and enticement of the horses with feed, salt or water onto forest roads where they are hit by vehicles. Makes one wonder if FS is complicit; saves money on roundups, after all.

The law requires the PUBLIC LANDS to be managed for multiple-use and HMA's to be managed principally for horses. This management plan fails to safeguard MY wild horses, favoring instead the livestock industry (and off-road recreators.)