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Comments: Pg 3. Fig. 1 on pg. 3 is simply a designation area supported by an imaginary line. Ie toward the west the FS 300 rd is gravel with no fencing on either side to contain Horses inside the Territory "Proper." The true Fig 1. Map that I have has by-laws written on it as follows:

1. "There will be no defining boundary fence for the HWHT."

2. "Horses will ingress and egress from the boundaries (imaginary lines) of the HWHT onto adjacent US Forest Service lands on the Black Mesa Ranger District."

3. "All horses within an agreed upon Territory Monitoring Zone (TMZ) beyond the HWHT will be considered to be members of the HWHT population, if they have use affinity to the HWHT, as determined by the HPMTG recommendations.

Pg 4. Fig 2 is incomplete and used the same imaginary designation line as Fig 1 pg 3; except the ingress/egress to the fence at Forest Lakes, AZ is the western boundary. FR 132 at Clay Springs, AZ is the Eastern boundary and has a containment fence separating Black Mesa Ranger District from Lakeside Ranger District. Two other pastures of Horse ingress/egress are absent from this map. They are "willow" and "cottonwood" respectively. The southern border of the Black Mesa ingress/egree lands is the Fort Apache Indian Reservation enclosed in part by 3.1 million acres of Apache Sitgreaves Nat'l Forest. The same genetic (DNA) bloodlines have migrated back and forth for 500+ years. Also in 1934, Army remount horses were lost on the Mogollon Rim when our cavalry soldiers drove them from Mexico to Canada to save them from our government.

Pg 5. Territory History par. 1. It would be impossible to do a Horse census in 1974. Then to say that a stallion was sterile because of the absence of foals is very disturbing for an educated person to make this claim. Mountain lions eat the baby foals within 30 days if the band does not have sufficient "eyes and ears" on the babies at all times. And also the newly introduced "Mexican Grey feral dogs" are taking their toll now. We only currently have 113 of the projected minimum of 320 for 8 continuous years before they (wolves) will be delisted by the Fish and Wildlife Services. You may want to ask what they will be eating when the horses are exterminated like the 60 million Boson that once roamed freely.

Pg. 7 Summary of findings - ethnographic study (USDA/Forest 2017) No fences existed in the 1930s. This entire page and others was created for "public deception" in my opinion. I applied to be an "interviewee" but the greedy ranchers got those interviews instead.

Between 1885-1888 James Warren Stott built a wild mustang horse herd at the "Aztec Spring Ranch" and the "Bear Springs Sister Ranch." He was raising over a hundred mustangs and forty + heifers on the (now) Black Mesa Ranger Dist. Stott Built his herd by roping existing mustangs on the range known today as the Black Mesa Ranger Dist. Hundreds existed at that time.

In 1937 Laureld Bigeler - Thomas Shelley - Cleve Holyoke roped and broke 2-3 year old mustangs from this Black Mesa Ranger Dist. Every spring. They sold them to Ronnie Rupe, White Mountain Apache Tribal chairman. Holyoke also sold his personal saddle mustang Horse "Rock" to Ronnie Lupe before he joined the military. If horses migrated back over the Mogollon Rim (no fencing), they were simply returning to their Homeland.

Pg. 8. Horse populations extremely exaggerated! Clay Springs, AZ - Linden, AZ. - to Show Low, AZ. Is in the

Lakeside Ranger District and not in the ingress/egress Black Mesa Ranger District as awarded to the Hebers Dec. 17, 1971 by Congress and Former President Richard M. Nixon. Also the Horses in Coconino County at Forest Lakes are exempt from county because they are "out of bounds" of the Black Mesa Ranger District. Any Horses outside of the BMRD are considered "free roaming" under Act of 1971, 16 USC sections 1331 to 40 (Protected) and, The Heber Wild Horses are further protected by the assigned sanctuary known as the Black Mesa Ranger District.

The Horses at Forest Lakes, AZ Coconino County were purposely driven/forced out of the Gentry grazing allotment into the un-fenced habitat area to the west. This was during the Seibert Cattle Co. (Texas) time period occupying this Gentry Allotment. The Foreman Range Management Mr. L. Gibson would have names of their accomplices. Many insurance companies and innocent families have been greatly harmed by having collisions with these horses resulting in negligent homicide and reckless endangerment. It took me two years to get the twelve (12) new horse warning signs erected.

Pg. 10. Again, this map does not show eastern transition from ingress/egress Black Mesa Ranger (FR 132) to Lakeside Ranger District at Clay Springs, AZ. Question: How many horses burned up in the Fire? In 1989 I witnessed 12-15 Horses in Sharp Hollow and about the same number in King Phillip. Survey shows zero today[hellip]

According to my interview with former Black Mesa Ranger District employee's: He and she witnessed multiple pregnant gut-shot mare skeleton's with full-term baby skeleton's in their wombs. They were found in the deep canyons of King Phillip - Sharp Hollow and Gentry. Also the job they held were to bait and trap 187 horses for day Riedhead for the Forest Service/USDA/Black Mesa Dist. Between 1988 and 1993. Riedhead was paid $18,700.00 plus feed and water at his winslow ranch.

Pg. 11 - Conclusion. This plan will ruin these Heber Wild Horses! The proposed use of PZP-22 will ruin individual dynamics of each Bond. Your plan will cause "strangles"/distemper every time you plat satan. These few remaining horses are a historical natural resource cherished by my horseback riding clients from all over the world. You do not know what you are doing!!