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First name: Jim

Last name: Unmacht

Organization: Arizona Sportsmen for Wildlife Conservation

Title: Executive Director

Comments: September 26, 2019

Dear Mr. Best:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, hunter recruitment/retention, and educating sportsmen and women on issues important to their passions. AZSFWC has 41 member, affiliate, and associate organizations that span the spectrum of hunting, angling, shooting and outdoor recreation groups, as well as businesses across Arizona. Our member groups represent in excess of 10,000 sportsmen and women from Arizona.

As you know, Arizona is blessed with six National Forests including the Apache-Sitgreaves National Forest (ASNF), that afford sportsmen and women, as well as the public in general with a myriad of hunting, angling, and other recreational opportunities across millions of acres of Federal public land. All of these endeavors generate millions of dollars of economic activity that benefit focal communities and the entire state economy as a whole.

To our concern, many of these wildlife related values and pursuits are now at risk due to the ongoing failure to address the adverse impacts on the landscape and habitat of the ASNF because of an unmanaged feral horse population.

Item 4 of the In Defense of Animals, et. Al. vs. United States Forest Service. Et. Al. Stipulation Agreement, dated March 13, 2007, directs the Forest Service to develop a Heber Wild Horse Territory Management Plan in accordance with the provisions of the Wild and Free-Roaming Horses and Burros Act of 1971, as amended, and Forest Service Manual direction at FSM 2263.

Since that court decision, sportsmen conservationists across Arizona have waited patiently for the plan to be developed. In the meantime, the feral horse population has spread essentially unchecked across the ASNF. These feral animals are now ranging far beyond the initial 19,000 acre Wild Horse Territory and the surrounding Territory Monitoring Zone!

AZSFWC understands the Heber Wild Horse Territory Collaborative Working Group issued their final report in November 2018, which we were only recently able to read. It was our understanding the ASNF would use this information to develop a Proposed Action, and keep the public fully engaged in the process.

According to the ASNF web page for the Heber Wild Horse Territory accessed on September 5, 2019, it says:

"The draft proposed action in development and internal review. The first formal public comment period of the draft proposed action is scheduled for 2019."

<https://www.fs.usda.gov/detail/asnf/landmanagement/resourcemanagement/?cid=fseprd534235>

However, as of this writing AZSFWC has yet to see any of the details of the proposed action or any formal updates from the ASNF. The Federal Court mandate is now over a decade old, with little discernible progress toward a viable management plan. Meanwhile, the feral horses keep breeding, expanding their range, and further degrading wildlife habitat.

AZSFWC recognizes this issue inspires strong emotions on all sides, but simply ignoring the problem will only

make an already unsustainable situation even worse!

AZSFWC and the 35 member organizations listed below, respectfully request that the ASNF undertake the following actions:

1. A formal update to all stakeholders on the Proposed Action,
2. Expedite the NEPA planning for the Heber Wild Horse Territory,
3. And make a sincere effort to re-engage with stakeholders.

Thank you.

AZSFWC Members Supporting Proposed Action on Heber Wild Horse Territory (list in attachment)