

Data Submitted (UTC 11): 3/3/2020 7:00:00 AM

First name: Frances

Last name: Perkins

Organization: Navajo County Natural Resource Conservation District

Title: Chair, Conservation Board

Comments: Navajo County Natural Resource Conservation District

March 3, 2020

The Navajo County NRCD appreciates the opportunity to submit our thoughts and comments regarding The Heber Wild Horse Territory Plan.

We feel the White Mountain Apache/Ft Apache tribe should have the first claim and responsibility for the horses. The horse come from the reservation originally. The Tribe owns them other than the horses people have just turned out. The agreement with the Tribe on fencing should be completed and enforced. The issue is the fencing is not maintained enabling the herds to graze where they find feed and water in the purposed area and other lands. There is no way to manage the horses that would be effective or economical. The small area suggested to run 104 head (1900 ac) is not near enough. The herd would need a much larger area to survive in a good year. Carrying capacity in the State of Arizona for cattle is 6 to 7 head per section (640 ac). There is not near enough feed or growing time for the vegetation to support the purposed herd or wildlife. The forest receives a lot of snow couple times of year in this area that will also limit the herd from grazing in turn some will starve. Many do not see the poor effects and conditions suffered by the horses and the environment when the herds are not managed properly. Fencing the area off will not be feasible either as it would really limit the grazing for the horses, making the planned area again not a responsible management plan. Livestock permittees will be completely cut off these areas causing a hardship for them especially in these droughty conditions as well as the wildlife in the area. Domestic livestock is intensively managed through planned periods of grazing deferment and rest, salt and mineral and water placement. Wildlife is hunted to control their populations. Horses cannot be managed in these manners.

Horse are very destructive to the grazing land. Horses cannot be controlled in a way that they wouldn't devastate the land. Soils in the horse areas will have a higher risk of soil erosion due to trampling that can cause bare grounds. Soil erosion can cause irreversible decline in plant production and stability, affecting permanently the productivity and function of the area. North of the Petrified Forest National Park there is currently an area of wild horses that have left the land arid and completely unusable by the horse herd. The land is just about ruined. The current Wild Horse and Burro Act should be enforced in this area.

Our main concern is conservation in the area. Conservation of the lands and watersheds need to be the priority both short term and long term. Having the horses in the Heber area must be managed by the Forest Service and White Mountain Apache Tribe in a responsible way to manage and conserve our National Forest Lands or private lands protecting the land, wildlife and what is best for the horses.