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Comments: Please vote no to the propose plan, and resubmit one that is ethically responsible to the horses, and scientifically based. These are two examples of HWHT management plan failures:

1) "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death;"

The Forest Service management plan fails to address how they will protect the few horses they leave in the forest from capture, harassment, or death. Three January killing sprees in a row resulting in the deaths of dozens of horses yet they have not put forth a plan on how they intend to protect them.

2) The Forest Service uses an exaggerated and failed method to calculate population growth of the Heber herd. Using the population of 200 horses provided by the Forest Service in 2002, if the growth rate were 19.5% per year as the Forest Service claims, there would presently be 5,902 horses in the Heber herd. That's ridiculous! The Forest Service itself estimates the current herd population to be 270-420 horses. But they want you to believe that the estimated high end of the population is accurate and it will increase by an average of 19.5% annually if something isn't done immediately. The Forest Service population growth numbers are highly inflated, most likely in an attempt to show urgency to reduce the herd population as fast as they can. A more than 20 year history of the Heber herd, including their own population estimate shows their (Wild Horse Territory WinEquus Population Modeling Analysis) is just another fail.