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Organization:
Title:
Comments:
Please accept the following as my comments for Heber Wild Horse Territory Plan #18916.

1.In all instances the USFS must hold true to The Wild Free-Roaming Horses and Burros Act of 1971 that states "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Removal and branding/freeze marking, in general, is precluded by the very words of the Act thus the USFS is actually going against the spirit of the law and, under certain interpretations, is actually undermining federal law by engaging in these activities on a federally protected animal. With this in mind the current management plan fails to:
a.Address how they will protect the few horses that will remain in the Heber Wild Horse Territory after the gather. How will the horses be protected from capture, harassment, or death. With the serial shooting of horses in the past several years that has killed dozens of horses, where are the proposed protections from such actions? The USFS plan must outline what measures will be taken to protect the few horses to be left in the territory.
b.Under the same provision in the The Wild Free-Roaming Horses and Burros Act of 1971 how will the gathered horses be protected from death during the gather and after the gather? Will protections for the gathered horses from entering the slaughter pipeline be put in place? The current BLM/USFS adoption and buying programs do not accomplish this. This must be reviewed before any horse is gathered.

2.There should be an independent/non-biased review of how AML's are set and population growth calculated. 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. Obviously, there are not that number of horses in the area. Also, this 19.5% is very close to the standard 20% growth rate the BLM claims in many of its current EAs that have just entered comment period as well as past EAs dating back several years. How can the majority of territories and HMAs have the exact same growth rate? This is scientifically improbable. There should be an independent/un-biased review of how these numbers are being established by the USFS before any gather can happen. And the research should be specific to Heber and not based on generalized population models. A true and scientifically sound population growth rate must be establisthed before an AML can be set. 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.

3.While the EA provided some opinions it provided no factual evidence that there were only 7 horses in the Sitgreaves in 1971 when the Wild Free-Roaming Horses and Burros Act became law. The EA failed to show pertinent information such as:
a.the name and title of the person who made the final decision to designate that particular area as the legal Territory.
b.the method and dates and people responsible for the "inventory" that resulted in the Forest Service claiming there were only 7 wild, free-roaming horses in the Sitgreaves in 1971.
c.survey data of the Territory area they decided upon
d.explanation as to why they determined that area as the Territory

4.The USFS must provide evidence that areas as described on page 14 of the plan actually exist before any horse is removed: "Some other area designated as a wild horse and burro territory, if suitable habitat and grazing capacity is available." To my knowledge, horses are not being relocated in this manner ever. They are just sent to holding facilities. Please provide evidence that such an option actually existis.

5.Regarding "Removal" mentioned and the used of immunocontraceptives, sterilization, and other population control techniques.
a.What is the sense of a gather if the USFS seems to already be aware that removing the numbers of horses proposed in the plan could lead to genetic bottlenecks where horses from other territories are proposed to be brought in to introduce more genetic variation into the herd. Shouldn't a genetic analysis of the current population be done to establish a baseline from which to work and then the AML established also taking into the current genetic health of the herd? Why remove horses knowing you are going to adversely affect the health of the herd? Please supply the evidence and cite sources that would support gather and introduction over just leaving the horses as is.
b.Of all the population control methods the only well researched, humane option is PZP. All others should not be considered as there isn't enough research into the effects of these methods on wild horses health and natural behaviors, and some are unnecessarily cruel. Again, please choose well established science over unproved experiments.

In conclusion, the gather is unnecessary. If population management needs to happen then establishing a solid, well organized, and data driven PZP program will accomplish that given enough time. And yes, it will take time, but it is a far better alternative than much of what is proposed here. Look to the Fish Springs horses in Nevada and the horses of Assateague National Seashore as examples.

Sincerely,

Peggy Kaszas