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First name: Michele

Last name: Anderson

Organization:

Title:

Comments: The WFRHBA mandate states: "all management activities shall be at the minimal feasible level". The WFRHBA also makes it clear that the protections of the wild and free-roaming horses take precedence over the multiple use concept. Yet this management plan considers the horses to be of comparable or even lesser importance than the public lands cattle ranching on the Sitgreaves.

The HWHT management plan fails to afford the Heber wild horses the protections required by the WFRHBA. The plan also calls for management measures which are beyond the "minimal feasible level" and are therefore not in compliance with the Act.

Restricting Wild Horse Movement by Cattle Pasture Fences and Eliminating Horses

Wild horses are to be given precedence over cattle. But as it stands now and what is being put forth in the management plan ignores that. The HWHT management plan has been formulated around pleasing the public lands cattle ranchers. The HWHT is crisscrossed in cattle pasture fences which prohibit the free movement of the horses throughout their designated territory. The wild horse population cannot legally be reduced in order to allow more forage for privately owned, public lands cattle. Under the Federal Land Policy and Management Act (FLPMA) of 1976, multiple use mandates that the FS cannot give priority of use to livestock grazing. But by culling the Heber herd, of which no proof of overpopulation exists, the HWHT management plan is giving priority to cattle grazing because the plan is actually constructed to reserve more forage for the cattle by eliminating horses that have a designated right to be there. This plan has nothing to do with the health and protection of the Heber herd or the health of the forest. It is focused on reducing the wild horse population in order to put as many cattle in the forest as is possible.

The Management Level (AML) of 50-104 horses the plan calls for is inadequate for genetic diversity and will put the herd on the path to extinction. Scientific evidence sets an AML minimum at 150-200 horses in order to have an average of 50 effective breeding animals at any given time. This recommendation for wild horse management is in the BLM Wild Horse and Burro Handbook. A minimum level of 150-200 horses is required to sustain the genetics of the herd and therefore the herd itself.

"A minimum population size of 50 effective breeding animals (i.e., a total population size of about 150-200 animals) is the minimum number of animals recommended to maintain an acceptable level of genetic diversity within reproducing WH&B populations." (Cothran, Gus, 2009. BLM Letter dated July 16, 2009.) "This number is required to keep the rate of loss of genetic variation at 1 percent per generation. Animal interchange between adjacent HMAs with smaller population sizes may reduce the need for maintaining populations of this size within each individual HMA."

Bringing in horses from other herds after the deliberate decimation of the current population is not only a failure of the plan, it is also inconsistent with the FS range management handbook which states:

2263.11 -Elements of Plan1. Objectives. Clearly state the objectives of managing animal, vegetation, and soil resources. In establishing objectives, note the importance of retaining wild free-roaming horses and burros in ecological balance. Wild Horse and Burro Territory plans are to conform with the Forest land and resource management plans. Consider existing livestock and wildlife needs and activities as well as the forage requirements of all animals. Selective removal of excess animals or relocation of superior animals from other territories to improve gene pool is prohibited. The intent of the Wild Horses and Burros Protection Act is to

manage these animals as part of the natural ecosystem.

"all management activities shall be at the minimal feasible level"

Captures, removals, birth control, etc. is inconsistent with "all management activities shall be at the minimal feasible level". This management plan is all about expediency with the goal of managing the Heber wild horse herd to extinction.