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Comments: THE WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971  
(PUBLIC LAW 92-195)

§1331. Congressional findings and declaration of policy

Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people; and that these horses and burros are fast disappearing from the American scene. 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.

The main objective of the Act is the protection of the wild horses. Not only is it imperative to keep the Heber wild horses running free in the Sitgreaves but also to preserve the natural behaviors of the herd. The National Academy of Sciences stated: "preserving natural behaviors is an important criterion" in the management of wild horses. The HWHT management plan fails to implement measures that preserve the wild nature and natural order of the Heber wild horse herd.

Reserve Design: An intelligent, wise, and caring way to establish genetically viable, ecologically well-adapted, and naturally self-stabilizing populations of wild horses and burros. These would be left to live in peace, be born, grow to maturity, and pass on in the wild, thus contributing their remains to the natural community that sustains them. They would become an "integral part of the natural system of public lands" as the Wild Free-Roaming Horses & Burros Act [WFHBA] of 1971 stipulates. Reserve Design is an important branch of Conservation Biology (Peck 1998; Downer 2010).

The Wild Free-Roaming Horses and Burros Act requires that "All management activities shall be at the minimal feasible level".

The Heber wild horse herd has never been proven to be overpopulated. Any management plan should provide for their protection, not decimation. Human interference in determining what horses can breed is not only unnecessary, it defies nature and takes step in turning wild horses into nothing more than a pasture herd. A perfect example of the destruction through over-management of what was once a wild horse herd is Arizona's Salt River horse herd. It's pathetic to see them standing around as if they were in a feedlot or petting zoo. Unlike the Salt River horse herd, the Heber wild horse herd has a designated Wild Horse Territory and is protected under the Wild Free-Roaming Horses and Burros Act. Do not steal the "wild" from the Heber herd the way it was stolen from the Salt River herd. To do so would not only be unconscionable it would also be in violation of the Act.

Population Reduction

Culling the herd to a genetically nonviable population is not the only tool being used in the management plan for population reduction. Sex ratio skewing and many forms of birth control are also in their toolbox. While sex skewing happens in nature, it is by nature's design. It is one of nature's ways of preventing overpopulation. Through it, only the strongest and fittest stallions will pass on their genes. The older band stallions will lose battles with the young and this is one of the ways that the gene pool remains deep. It's the way of the wild. However, the interference by man making the choices of which horses will be removed, which will be left, which will be allowed to breed, which won't, etc. prohibits nature from running it's course and imposes man's ideals instead.

Another failed part of the HWHT management plan is:

#### Fertility Reduction

Fertility control refers to the manipulation of reproduction, either to improve or reduce. The primary focus in this case is to reduce fertility. Fertility reduction will be used to slow the rate of horse population growth over the territory.

It is no wonder that the list of birth control methods considered in the plan is a long one. After all, the objective of the management plan is to get as many horses out of the forest using whatever methods possible while attempting to give the appearance of falling within the legal parameters of the WFRHBA. Overpopulation of the Heber herd has never been proven. The real issue here is the 'big white elephant in the room' which is grazing interests. First calling for a major cull that on its own will reduce the population well below what is genetically viable. Then furthering the path of herd extinction with the use of birth control. The plan is a fail.

From the plan: achieving the desired appropriate management level while allowing for genetic diversity.

It will be impossible to allow for genetic diversity if the HWHT management plan is implemented. This plan is a failure by design. The plan calls for bringing in horses from other herds if the gene pool of the Hebers becomes too shallow due to the failure of the plan to protect the herd from being genetically destroyed because of the methods the management plan outlines. There is absolutely no logic in decimating a stable, self sustained, fully functional herd through culls and birth control and then trying to remedy this plan of destruction by supplementing the herd with horses from other herds. Bringing in horses from other herds would only serve to dilute the genetics of the Heber herd. No logic whatsoever in this plan unless it is a planned design for failure to preserve the herd.

Humans making the decisions as to what domestic horses will breed is one thing, but there is nothing natural or wild about it. And in fact, humans have made a lot of poor decisions when it comes to domestic animal breeding and animals have suffered for it. Breeding for a certain color or 'look' is not breeding for strength, fitness, endurance, and the ability to survive in the wild.

Birth control use on wild horses does not only prevent them from reproducing, it also changes their natural behavior which can directly impact their survival skills. Birth control will result in removing the wild spirit and nature from the horses and further herd depopulation.

The EA? ?failed to? ?include:

All historical,? ?current and future ten-year range monitoring and plans and scientific methods used for this monitoring.

Any and all PZP? ?or? ?Gona? ?Condarting studies and records for the past ten years including darted? ?mares that subsequently had a live birth foal and all darted mares that have died including basic statistics on those? (?age at death and reason for death?) ?and all proposed PZP? (?or any other method of herd population control? -?including sterilization and castration?) ?plans for the next ten-year plan.

"Why PZP and wild horses do not belong together"

Craig C. Downer March 24, 2020

Excerpt:

Some of the most alarming effects of PZP are:

(1) The undermining of the immune systems of the wild horses over the generations. This sets them up for decline and die-out due to disease, inclement weather or other stressful situations.

(2) The serious stress and discontent experienced by the PZPed mares in not being able to complete their natural reproductive life cycles. This leads to their frustrated rejection of stallion after stallion.

(3) The disruption of the social bands and their hierarchies because of the above, which throws both the individual bands and, consequently, entire herds into disarray. This breakdown of education passed from the older stallions and mares to their progeny affects their ability to survive in the long-term.

(4) The lack of customary reproductive inhibition of younger by older horses, as occurs in mature and natural horse societies, throws the social order into disarray and negatively affects the survival ability of the horses. (The same applies to burros.)

(5) The out-of-season, deformed and stillborn foals documented to be born (or nearly) from those mares who are coming off of PZP. This has been reported by scientists as well as ordinary concerned citizens. And the list goes on!

<https://www.horsetalk.co.nz/2020/03/24/pzp-wild-horses-do-not-belong-together/>

"Why Using Birth Control on Wild Horses is Not the Best Public Policy"

By Michael Harris and Andrea Gelfuso, Friends of Animals

Excerpt:

What Needs to be Done

Our public lands have become ecologically unsound because of extensive human involvement that favors commercial exploitation over protection of ecosystems and species. We have killed off or limited the number of nearly every native animal; we have over-utilized resources; and we have filled the landscape with non-native species.

Restoring ecological health and the equitable use of public resources is a dream we cannot give up on. While many might call it a pipe dream, hopefully not all of us will cave into the pressure to conform, but will continue to advocate for true ecological zones on public lands where animals can be free from exploitation and management.

<https://www.onegreenplanet.org/animalsandnature/why-using-pzp-on-wild-horses-is-not-the-best-public-policy/>

It is obvious that the HWHT management plan and EA fail to include measures to protect and preserve the Heber herd. It is merely just checking off the required boxes of NEPA in order to fast track the removal and depopulation and ultimately the extinction of the herd.

I support NO ACTION.