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First name: Marlene

Last name: Oakland

Organization:

Title:

Comments: Heber Wild Horse Management Plan comment

Dear Forest Service, (my conclusion of this plan is it contradicts itself and shows why there is NO need to gather our horses)

I evaluated your plan and find there is only one part that I agree with. The Landscape Appearance Method sited only 13% usage and current use on page 32 shows that the habitat is healthy and sustainable. Also, throughout you mention there Has been no monitoring of the horses, but the land is healthy enough to increase the livestock usage from 25% to 35%. By your own mention of determining AML using BLM handbook (something that is arbitrary and not part of the law) is to use the current population of horses within a healthy environment. So if the horse population is on average 350 now and the land is healthy than the AML needs to be no less than 350 horses.

You mention in the plan the horses graze outside of the area, thus the land is not sustainable? But, once again no monitoring has been done and you even admit that fencing in many parts of the Herd Area have probably created the need for the horses to move elsewhere.

So many items, numbers and figures are in question. For one you mention aums in one area use approximately 600 lbs each through the feeding season and in another area the 900 aums use 60lbs each. The total of Aums in your charts are 965. Using the standard 1.5AU for aum (<https://beef.unl.edu/cattleproduction/understandinganimalunitmonths>) for 965 aums would put their actual usage more than 600 lbs per month, not season or the usage total per 6 months over 4 million pounds of foliage used by cattle. And for the horses (<https://ker.com/equineews/calculating-pasture-and-forage-consumption-of-horses/>) if all 350 horses are large adults would consume approx. 2 to 3 million lbs. So now, we no longer have the cattle using 1/4 of the foliage. We have the current number of the horses full year using 1/2 of what the aums use.

I could point out many more discrepancies in this plan. So, this plan needs to be tossed.

Yes, I am biased for the horses, since after all this is a plan for the horses. We have been visiting the horses for over 50 years and love them and believe with our heart and knowledge (raised on the ranch and educated in Science and Accounting) the horses are necessary for long term health of our lands. Cattle not so much which need fulltime cowboying and supplemental feeding.

Please do not let Finite exploiters control your decision making. One thing we have been asking you to do is to set rules in Herd areas for the allotment holders in sensitive areas. One is they should never be granted allotments just because they have 15 acres of desert with drop off shoots. They should only be allowed to share within the herd areas if they are a full working ranch and live there, are accountable and sensitive (spelled out for them) and are American citizens with American ranch companies. - and not just their managers, the owners also. -- with signed agreements and penalties.

Marlene Oakland

Great Falls, Mt and Tucson, AZ