Data Submitted (UTC 11): 4/10/2021 11:47:42 PM
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Comments: Concerns and suggested changes to the Heber Wild Horse Management Proposal:

Tables 4 & 5 Horse Survey: The last horse number survey was conducted four years ago in 2017, I assume due to lack of funds. As a result of fires and the severe drought Arizona has experienced during the last four years, significant changes to the wild horse population have most likely occurred.

Table 10 Total Available Forage: The forage availability is based upon only three data points (2007, 2008 & 2018) with a ten year spread. During this time, fires and drought conditions undoubtedly changed forage availability. Three data points over an eleven year period does not provide a significantly accurate average.

All of the following are suggested changes to the verbiage in the proposal. In order to achieve consistency, efficiency and increase probability of success, actions specified throughout the proposal need to be focused without possibility of deviation from the desired outcome. The frequent use of the word "should" throughout the specified actions throughout the proposal provide possible options that could lead to undesirable outcomes. I suggest that the following changes be made:

Page 32, Appendix C
Facility Design, Trap Sites and Temporary Holding Facilities

#2: ... sites should be... changed to: .... sites will be...
#5c: ...should be maintained... changed to: will be maintained...
#12: ...should be constructed... changed to: will be constructed...

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#15: ...noisy objects should be... changed to ...noisy objects will be...

Loading and Unloading Areas

#7: stock trailers should be... changed to ...stock trailers will be...

Page 36 Care

#1d: ...staff should adjust... changed to ...staff will adjust...

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#4e: ...animals should be identified... changed to ...animals will be identified...
#4f: ...facility should be maintained... changed to. ...facility will be maintained...

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Bio security
#3b: ...disease should not be... changed to ...disease will not be...
#4: ...operations should remain... changed to ...operations will remain...

Page 38

Handling: Willful Acts of Abuse

#3: ...should be no deliberate driving... changed to ...will be no deliberate driving...
#4: ...should be no deliberate slamming... changed to ...will be no deliberate slamming...
#5: ...should be no excessive.... changed to ...will be no excessive...

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Handling: General Handling

#2: ...horses should be handled... changed to ...horses will be handled...
#3: ...horses should not remain... changed to ...horses will not remain...
#4: ... equipment should be... changed to ...no equipment will be...

Page 39. Transportation: General

#2: ...removal should be shipped... changed to ...removal will be shipped...
#3: ...shipping should occur... changed to ...shipping will occur...
#5: ...horses should not wait... changed to ...horses will not wait...

Page 40: Vehicles

#10: ...vehicles should be... changed to ...vehicles will be...

Page 40: Care of Wild Horses During Transport Procedures

#2: ...horses should be sorted... changed to ...horses will be...

Page 41: Euthanasia or Death

4: ...condition should be taken... changed to ...condition will be taken...
6: ...veterinarian should review... changed to ....veterinarian will review...

Page 41: Carcass Disposal

#4: ...range should no be... changed to ...range will not be...
...trenches should be dug... changed to ....trenches will be dug...

Page 46: Appendix E

Removal of Excess Animals

#1: ...plan should document... changed to ...plan will document...
#2: ...Contacts should include... changed to ...Contacts will include...

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#1: ...contract should also be discussed.... changed to ...contract will be discussed...

#4: ...inspectors should be advised... changed to ...inspectors will be advised...
#7: ...carcass should meet State... changed to ...carcass will meet State...
#10b: ...Studs should be separated... changed to ...Studs will be separated...
#11: ...safety plans should be developed... changed to ...safety plans will be developed...

Thank you for the opportunity to provide input on this important proposal plan, your careful consideration of my suggested changes and the important work that you do!

Sincerely,

Steven D. Owen, Ph.D.