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Comments:

As a member of the public, I greatly appreciate the Heber wild horses. Having the opportunity to see these wild horses and read about them online provides me with great enjoyment of our public lands. I feel strongly attached to the Apache-Sitgreaves National Forest specifically because the Heber wild horses live in this area.

Increase AML to a minimum of 150 to 200 horses (in order to have 50 effective breeding animals) as recommended by the BLM Wild Horse and Burro Handbook in order to maintain an acceptable level of genetic diversity (Cothran, 2009). The USFS is authorized by the Wild Horse Act to create a Heber Wild Horse Sanctuary and remove all livestock from the Territory, since that is what is needed to manage this herd as a sustainable population. The EA fails to adequately consider this option.

Preserve natural wild horse behaviors. As the National Academy of Sciences determined "preserving natural behaviors is an important criterion" for wild horse management. Therefore, drugs that destroy the healthy function of ovaries should be precluded from management actions. It is well established that ovaries produce hormones necessary for both natural "wild" behaviors and mental, emotional and physiological wellbeing -- including but not limited to bone density, joint health, and other physical symptoms.

Relocate all wild horses back into the Territory (through humane herding techniques). USFS should move those horses outside to the Territory and manage them with PZP humane fertility control to preserve natural wild behaviors.

Address the fencing problem that literally fences out wild horses from their Territory; fails to consider removing fencing that is clearly preventing wild horses from entering and utilizing the Territory. During drought periods due to the horses suffer due to being fenced off from water sources.

Consider public-private partnerships to implement a fertility control program to prevent removals, allowing wild horses to live and die wild as intended by the Wild Horse Act.

Reassess the Territory boundary, as currently drawn, given that is not based on wild horses' natural, seasonal utilization patterns - omitting important adjacent lands that have historically been used seasonally by this herd. The Management Plan must address seasonal movement of the horses and make a recommendation that the boundary is redrawn to be in conformance with historic wild horse usage and the animals' natural need to have access to suitable habitat throughout the year. All source documents regarding historic horse use should be included in the Management Plan appendix.

We call on the USFS to work with bona fide wild horse advocacy organizations to create a private-public partnership to humanely manage the Heber Wild Horse Herd. We urge you to adopt the steps outlined above to reduce the horse population safely over time, through humane PZP fertility control and natural attrition. Let's work together to make this program humane and sustainable.

Thank you for considering this proposal and for working to protect our these iconic treasures for future generations.