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Comments: The Forest Service's Territory Management Plan for the Heber wild horses of Arizona will decimate their population. The Forest Service permits thousands of cattle to graze in the horses' habitat. Specifically:

*The plan AML is set extremely low - 50-104 wild horses on 19,700 acres. (i.e. one horse for every 394 acres).

This is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

*The plan AML allots wild horses 600 Animal Unit Months while allotting cattle 5,730 Animal Unit Months. The Forest Service must adjust livestock use in the Territory.

*The last population survey in the Territory found that many of the horses were outside of the Territory boundary. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.

*The plan provides for fertility control to limit the population growth of the horses. The Forest Service must address:

o(1) How fertility control will impact the herd health when the population is maintained at such a small population.

o(2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.

o(3) IUDs are not humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

o(4) Spaying wild mares is cruel and unacceptable.

If removals must occur within the Territory, they must be done exclusively through bait-trapping and over time to meet adoption demand. The Forest Service should not add to the thousands of wild horses already in off-range holding facilities across the country.

Finally, the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service must protect these federally protected wild horses from harm and prosecute these criminals to the fullest extent of the law.

Ranchers who have purchased favors from the Forest Service must be prosecuted to the fullest extent of the law.

Forest Service employees who have sold favors to ranchers must be prosecuted to the fullest extent of the law.