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Comments: I hereby submit the following information for the administrative record.

The plan and EA is failed from the beginning. In order to develop a management plan a sound foundation is necessary. The management plan should have been developed on a foundation that began with a correct HWHT land designation that included the entire 818,651 acres of the Sitgreaves National Forest. Based on all information obtained through FOIA requests and what is stated in the management plan and EA, surveys of wild horses were never conducted throughout the Sitgreaves in order to establish a designated Heber Wild Horse Territory. The HWHT designation needs to be expanded to include the entire Sitgreaves National Forest. AML and forage allocation must be based on 818,651 acres and not 19,700 acres.

The WFRH&B Act states:
"All management activities shall be at the minimal feasible level"
Culling the herd down to a nonviable number of 50-104 horses then using birth control is not in compliance with the Act. The AML of 50-104 horses is not sufficient to maintain natural herd viability. Leaving a population too small to be viable then introducing horses from other herds is clearly over management and in defiance of a "minimal feasible level". That type of administration corresponds with domestic pasture horse management, not wild horses. This plan for over management will rob the wildness from the herd and puts the herd on track for a breeding program like that of domestic horses and thus clearly violates the Wild and Free-Roaming Horses and Burros Act.

Understanding domestic horses is not the same thing as understanding wild horses. The management plan speaks of a "wild horse staff". What are the qualifications for being part of that staff? How much knowledge of wild horses is required? Knowledge of wild horses and of the Heber herd as a whole should be a mandatory requirement to be part of the "wild horse staff". The "wild horse staff" should know wild horse behavior. They should be educated on genetics including what makes a herd genetically viable. It does not appear that anybody from the Forest Service who was involved in the management plan or EA has the necessary knowledge to be part of a "wild horse staff".

The federal regulations and policy state that wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat. That wild horses and burros shall be considered comparably with other resource values in the formulation of land use plans. And management activities affecting wild horses and burros shall be undertaken with the goal of maintaining free-roaming behavior.?(?CFR? ?4700.0-6?)?.

Decimating the herd through human "management" violates federal regulations and policy.

Genetic variation is key to the preservation of a wild horse herd. Morphological differences that humans can see such as color or confirmation is only part of it. Genetic variation encompasses far more than if a horse is a bay or a palomino, large build or slight, etc. It is way more than having a particular "look". Unobservable gene variants are crucially important as well. There is variation or miscellany within the herd as a whole. Within the herd there is individual variation from one horse to another, heterozygosity. Both are components to a naturally genetically viable wild horse herd that man cannot replicate. Instance after instance of what were once genetically strong and diverse herds have fallen due to over management on the part of man through culling and artificial selection based on man's ideals instead of natural selection.

"the vigor of the species is preserved in the wild" ~ Craig Downer, wildlife ecologist

The Forest Service EA goes so far as to plan for the expected genetic failure of the Heber wild horse herd due to the population decimation their plan is calling for. And the 'remedy' for this planned mismanagement that is called for is to bring in horses from other herds which is in violation of of the FS range management handbook.

From the draft plan:
"When necessary, animals will be introduced to the herd to help broaden the genetic diversity of the herd."

From the 2003 range management handbook

2263.11 -Elements of Plan1. Objectives. Clearly state the objectives of managing animal, vegetation, and soil resources. In establishing objectives, note the importance of retaining wild free-roaming horses and burros in ecological balance. Wild Horse and Burro Territory plans are to conform with the Forest land and resource management plans. Consider existing livestock and wildlife needs and activities as well as the forage requirements of all animals. Selective removal of excess animals or relocation of superior animals from other territories to improve gene pool is prohibited. The intent of the Wild Horses and Burros Protection Act is to manage these animals as part of the natural ecosystem.

"What Is a Natural Ecosystem?
Anything that is "natural" is produced and exists in nature without intervention from humans. Therefore, a natural ecosystem is a specific group of living things working together with each other and the area around them to survive and thrive."
Natural Ecosystem Examples in Biology
https://examples.yourdictionary.com/natural-ecosystem-examples-in-biology.html

"The intent of the Wild Horses and Burros Protection Act is to manage these animals as part of the natural ecosystem." Let that sink in.

Everything that makes and keeps the Heber herd wild is stripped away in this failed management plan.

The Interior Board of Land Appeals (IBLA) has defined the appropriate management level as the "optimum" number of wild horses or burros which results in a thriving natural ecological balance and avoids a deterioration of the range. (109 IBLA 119; also reference Dahl vs. Clark, supra at 592). It is usually expressed as a range of numbers. Management Area Direction Apache-Sitgreaves National Forests Land Management Plan (Admin. Change #2, August 15, 2016) 119 level. As directed in the regulations at 36 CFR 222. 61(a)(1), the goal is to maintain a thriving ecological balance within the Apache-Sitgreaves National Forests Land.

Once a legal documented boundary is set, (the entire Sitgreaves National Forest) the establishment of an appropriate management level (AML) can be proposed by formulating the range of numbers of animals that will result in a thriving natural ecological balance and avoid deterioration of the range. The higher and lower limit of the appropriate management level for horses within the Heber Wild Horse lands must be based on an in-depth analysis of population inventory, resource monitoring, and other available data. Since the Sitgreaves is a multiple use area ALL factors including other natural wildlife, the imported elk, cattle, human impact, etc must be factored in.

The management plan and EA appear to have ignored everything stated in 2263.11. Glaringly lacking in the EA is the impact of cattle grazing on the forest.

As the district court explained in Dahl v. Clark, the test as to appropriate wild horse population levels is whether such levels will achieve and maintain a thriving, ecological balance on the public lands.

The only law that requires the USFS to maintain populations is the 1971 Congressional law. The law must be followed and the law states, "that wild free-roaming wild horses [and burros] are to be considered in the area where presently found, as an integral part of the natural ecosystem of the public lands". Thus, an AML established purely for any USFS administrative reasons because it was the level of the wild horse and/or burro use at a particular point in time or imagined to be an advantageous population for the USFS cannot be justified under statute.

The Public Rangelands Improvement Act (PRIA), a 1978 amendment to the WFHBA, requires the BLM to maintain a current inventory of wild horses and burros and to "determine appropriate management levels," i.e., the number of wild horses and burros that the range can sustain. AMLs were not meant to be static, but to be considered as dynamic and based upon various factors such as range condition or use.

Unfortunately and wrongly "multiple use" has been manipulated by greed to mean "multiple livestock use."

An EIS is essential due to the vast scope and the human impact of the development of a HWHT management plan. Expanding the HWHT to include the entire Sitgreaves National Forest and basing the wild horse AML and forage allotment on the total 818,651 acres is imperative.

"Sirs: With indignation and sorrow I viewed your pictures of the aerial cowboy who rounds up wild horses by airplane. I wonder if this man does not know that without man's best friend, the horses, this great west of ours could never have been pioneered the way it was. In time to come mayhap some man will take his small son up to a glass case and say, 'Son, that was once known as the Western pony.'
Our government should take shame for allowing an insensible machine to so terribly frighten beautiful, innocent colts."
Harry M. Ralston "Life" magazine, July 25, 1938