

Data Submitted (UTC 11): 4/17/2021 8:06:51 PM

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Comments: I am an Arizona resident, taxpayer, and vocal constituent.

The U.S. Forest Service recently released a Territory Management Plan for the Heber wild horses, which you know is a unique band of horses that reside within the Apache Sitgreaves Forest in northern Arizona. This reckless plan will decimate this historic population, leaving as few as 50 horses on nearly 20,000 acres of public land! Meanwhile, the BLM permits thousands of cattle to graze within the horses' habitat.

I am concerned (and strongly against) this plan for several reasons:

--The plan sets the AML at just 50-104 wild horses on 19,700 acres. Data indicate this is extremely low. This range is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

--With the new (low) AML, wild horses are provided only 600 Animal Unit Months to graze within the Territory.

Alternatively, cattle are permitted 5,730 Animal Unit Months. Obviously the Units are skewed towards cattle ranchers and special interests -- not the intent of our public lands. The Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource.

--The most recent 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 back to within the boundary.

--The plan provides for fertility control to be used to control the population growth rate of the horses in the Territory. It is imperative the Forest Service consider:

(1) how the use of these options will impact the health of the herd when the population is maintained at such a small population;

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

(3) IUDs, which are horrific, have not been proven humane or effective in wild, free-roaming herds. They must be eliminated from further analysis.

Removals do not need to occur. If, against public will, removals occur within the Territory, they should be done exclusively through bait-trapping and over time, to meet adoption demand and ensure that the Forest Service does not add to the thousands of wild horses already in off-range holding facilities across the country.

These horses are already under siege. They have been the target of brutal shootings in the Forest that have left 28 dead since 2018. Frankly, the Forest Service must work harder to protect these federally protected wild horses from harm [and find and prosecute the person(s) responsible].

Thank you.