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Comments: The AML should be increased to a minimum of 150 to 200 horses (the minimum needed for genetic viability) as recommended by the BLM Wild Horse and Burro Handbook (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. Relocate all wild horses back into the Territory (through humane herding techniques). USFS should move the horses outside back to the Territory and manage them with PZP humane fertility control to preserve natural wild behaviors. Address the fencing problem which fences wild horses out of their own Territory.

The EA fails to consider removing fencing that is clearly preventing wild horses from entering and utilizing the Territory. During drought periods 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.

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.