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Comments: I'm having a hard time understanding the logic behind your 50 to 104 AML calculations for the Heber wild horse herd. By the information contained in your own Tier 1 assessment studies, the current water and forage availability have all been deemed sufficient even with the current estimated population of 270 to 420 wild horses. From page 37 of the Proposed Appropriate Management Level Determination: "The tier 1 analysis indicated that the current use of the territory is meeting that direction-that is, the current use of the area by all grazing animals is well within the established use levels, utilization levels are low, and the plant communities are healthy." And from page 23 of the same document: "These low utilization levels indicate that the use of the territory, by all grazing animals, over the past ten years has been within the forage-producing capability of the area."

So if the natural resources available in the area have been plentiful enough to not only sustain the continued growth of the wild horse herd but also to continue to thrive at herd levels around 400 horses, why would the AML for this area be calculated at 50 to 104 horses? It doesn't make logical sense that the real world data indicates there are more than enough resources to sustain the current herd level and maintain a thriving ecosystem but the "on-paper" herd level calculation says the area can only manage a herd one quarter the size of the existing herd.

In addition to the inconsistencies between the real world evidence and the artificial AML calculations, it is also maddening that the alternative of reducing livestock grazing was not even considered for analysis, not only because it unfairly places all the burden of keeping the area ecologically healthy on only one source of resource pressure (the wild horses), but also because the explanation given for why it wasn't considered as an option emphasizes the fact that forage is so plentiful in the area that cattle grazing reductions aren't necessary. From page 15 of the Heber Wild Horse Territory Management Plan Environmental Assessment: "Because of the requirement to manage for multiple uses, the established history of authorized livestock grazing within the territory, and the abundance of forage that was not identified as a limiting factor in the appropriate management level determination, this alternative was not brought forward for detailed analysis." You are simultaneously arguing that forage is so abundant that no reductions in cattle grazing are necessary, but forage is so scarce that the wild horse herd must be reduced to a quarter of its current size.

Wild horses were placed under the supervision of the BLM because the public wanted to see them protected from harm-aggressive, drastic removals of large numbers of a herd from a healthy environment to appease the interests of private land owners and cattle grazers is the antithesis of your stated mission.