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Comments: Setting the "Appropriate" Management Level (AML) to an unnatural low number -- just 50-104 wild horses on 19,700 acres. Even at high AML, that's one horse for every 394 acres! This number is far too low to maintain a genetically viable population of wild horses in the Territory. This result will be the roundup of hundreds of wild horses in northern Arizona, from Forest Lakes all the way to Showlow.
Failing to protect the Heber wild horses, who have been the target of illegal hunting since 2018. Instead of spending money to eliminate wild horses, the Forest Service must work harder to protect these federally protected equines from harm and to find the person(s) responsible for their illegal killings. Should the Heber population be reduced to just 50 horses in the Forest, this illegal killing of horses could literally decimate it overnight.
Failing to treat the Heber wild horses fairly. With the unnaturally small population size, wild horses will be allocated an unfair share of resources within their public land habitat -- just 600 Animal Unit Months of forage per year, while cattle are permitted 5,730 Animal Unit Months to graze within the Territory. Instead, the Forest Service should adjust livestock use in the Territory in order to give wild horses their fair share of resources on public lands designated as their habitat. This reallocation would allow for a larger, more sustainable wild horse population and save taxpayers millions in capture and storage costs for the horses the Forest Service intends to remove from the range.
Treating wild horses inhumanely by rounding up hundreds of them, separating them from their families, and sending them to an already overcrowded federal holding facilities. If removals must occur, they should be done exclusively through bait-trapping (no helicopters) and in small numbers over time, to meet adoption demand and ensure that the horses do not end up in undesirable places. By pursuing only small, incremental removals, the Forest Service can avoid adding to the thousands of wild horses already in off-range holding facilities across the country.