

Data Submitted (UTC 11): 4/19/2021 11:49:35 PM

First name: Jane

Last name: Marsh

Organization:

Title:

Comments: These are comments regarding your plan for the Heber Territory.

First of all, the proposed AML is too low, even by BLM standards! 150 to 200 horses is the **\*\*minimum\*\*** needed for genetic viability as recommended by the BLM Wild Horse and Burro Handbook (Cothran, 2009). This plan sets the AML at an extremely low range of just 50-104 wild horses on 19,700 acres! Even at the high end of this range, it is much, much too low for genetic viability. It would be one horse for every 394 acres!

Instead of taking action that is akin to zeroing out the Heber wild horses, the USFS should consider other viable, ethical options, and options favored by the vast majority of US citizens. Some of these are below.

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. The EA fails to adequately consider this option.

A goal of the Heber plan should be to preserve natural wild horse behaviors. As the National Academy of Sciences determined, "preserving natural behaviors is an important criterion" for wild horse management. Therefore, drugs that destroy the healthy function of ovaries should be precluded from management actions. It is well-established that ovaries produce hormones necessary for both natural "wild" behaviors and mental, emotional and physiological well being.

When it comes to responsibly managing the horses and their territory boundaries, it seems the USFS has created a fencing problem. It blames the animals when they stray off the territory. (Fencing problem) And then there is the issue of fencing that clearly prevents wild horses from entering and using the Territory, and importantly keeps them from using water sources. (Fencing problem) USFS' course of action should be 1) Relocate all wild horses back into the Territory (through humane herding techniques); and 2) 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. This is a human-caused problem, not a wild horse problem.

Another facet of humane, ethical management would aim to study and reassess the Territory boundary. As it is currently drawn, it is not based on wild horses' natural, seasonal utilization patterns. This boundary omits important adjacent lands that have historically been used seasonally by this herd. The Management Plan must address seasonal movement of the horses and recommend that the boundary be redrawn in conformance with historic wild horse usage and the animals' 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.

Please work with bona fide wild horse advocacy organizations to create a private-public partnership to humanely manage the Heber Wild Horse Herd. Please adopt the steps outlined to make this program humane, ethical and sustainable.