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Comments: As an American citizen who has a stake in the sound management of OUR public lands and the protection and preservation of OUR endangered wild horses and burros currently being managed by the Forest Service and who would be personally harmed by this devastating planned attack on the federally-protected Heber wild horses of the Sitgreaves National Forest in eastern Arizona, I am submitting my Comments on the Heber Wild Horse Territory Plan.

This Proposed Action entails USFS conducting a devastating roundup to eradicate all but 50 mustangs who would be allowed to live on a vast 22,000 or so acres of public lands, while bestowing thousands of cattle to overgraze the same area once the wild horses are removed from their legal habitat. Over the next few years, more than 800 wild horses would be targeted and removed from their own rightful Territory after which the agency would proceed to manage this supposed wild horse habitat as a giant feedlot for invasive, private livestock to appease ranchers and their land grab agendas.

These are the same wild horses whose tiny herd numbers have been devastated over the last three years by the grisly and deadly shootings of 28 mustangs in the Forest, a savage crime that has yet to be properly investigated or prosecuted. This is an outrage! Even wild horse advocates who have attempted to offer information and evidence continue to be ignored. Calling for the massive removal of so many mustangs from this herd sends a disturbing message to the killers that they were right in trying to eradicate these wild horses. The unjustifiable lack of effort by the FS to find the monsters who committed these atrocities is the same as the agency giving its blessing to this horrific ongoing attack on a protected species. Is this the message the FS wishes to send to anyone who, for whatever reason, opposes the mere presence of the Heber wild horses in the Sitgreaves National Forest? I certainly hope the agency does not condone this shameless bloodbath!

The last thing the Heber Wild Horses need is to have their rapidly vanishing herd further decimated by this senseless planned assault by the Forest Service. This agency's time would be better served by making a serious effort to not only protect this unique and threatened small herd but the local community from the dangerous killers who are systematically wiping out these protected animals as they are an extreme danger to the public, including wild horse advocates who have been threatened, as well as the remaining Heber mustangs who have managed to survive these brutal killings which will no doubt continue until these maniacs are held accountable for these atrocities.

This senseless massacre is a heinous crime that must be taken seriously and investigated thoroughly. The Heber Wild Horses are PROTECTED BY LAW, therefore, it is of paramount importance that the guilty are discovered and brought to justice for these horrific crimes against a cherished and protected herd.

Justice for the Heber wild horses must be the top priority, as well as serious effort to allow for the recovery of their decimated numbers -- NOT perpetuation of the unjustified extermination of the last remaining members of this highly valued mustang herd.

The National Academy of Sciences determined "preserving natural behaviors is an important criterion" for wild horse management. Any drugs that destroy the healthy function of ovaries must be eliminated from management actions. It is well established that ovaries produce hormones necessary for both natural "wild" behaviors and mental, emotional and physiological wellbeing, including bone density, joint health, and other physical symptoms.

Furthermore, the Heber wild horses are NOT being managed as the PRINCIPAL users of their own habitat, being allocated a mere 600 Animal Unit Months (AUMs) while cattle are permitted 5,730 Animal Unit Months to graze

within this legal wild horse Territory. To rectify this unfair allocation of space and resources, USFS must adjust livestock use in the Territory to ensure wild horses are given their fair share of available resources. Cattle must be reduced, if not eliminated, to ensure the health of the range for the benefit of the mustangs, not their invasive, destructive competitors.

The AML for the Heber herd must be increased as the current "allowable" number is far too low to be sustainable. Equine genetic expert Gus Cothran, states that wild horse numbers must never be reduced to levels below the minimal population level of 150-200 effective adult breeders of standard reproductive age (not counting foals, yearlings or bachelors) that is necessary for long-term genetic viability and the preservation of healthy, self-sustaining wild horse populations. Furthermore, the 1971 Act clearly states that wild horses "shall be managed as self-sustaining populations." The USFS is authorized by the Wild Free Roaming Horses and Burros Act to create a Heber Wild Horse Sanctuary removing all livestock from the Territory, which is necessary to manage this herd sustainably, an option the EA fails to even consider.

USFS must also relocate any wild horses found outside the invisible, man-made boundaries of their legal habitat back into their Territory through humane herding methods, and manage them humanely to preserve their natural wild behaviors. It is, in fact, invasive livestock that must be driven out of this legal wild horse area, NOT the Heber mustangs.

The agency must also address fencing problems which prevent the Heber wild horses from accessing, entering and utilizing their own Territory. Such impediments to their free-roaming behavior must be removed as during droughts, mustangs suffer when prohibited from accessing life-saving water sources.

The Territory boundary must be reassessed as it is currently not based on wild horses' natural, seasonal utilization patterns, omitting essential adjacent lands that these wild herds have historically and seasonally used in the past. The Management Plan must recommend that the boundary be drawn in conformance with historic wild horse usage and the animals' natural need to access suitable habitat throughout the year. All source documents regarding such use must be included in the Management Plan appendix.

USFS must make a serious commitment to work with legitimate wild horse advocacy organizations to create a private-public partnership to humanely manage the Heber Wild Horse Herd on their range with the aim of forgoing removals to allow these animals to live and die free as Congress intended when it unanimously passed the Act 50 years ago.

USFS must seriously consider public-private partnerships to implement a humane fertility control to mitigate removals, to allow wild horses to live and die wild as intended by the Wild Free Roaming Horses and Burros Act of 1971.

The Heber mustangs belong to ALL AMERICANS -- they are NOT for the Forest Service to annihilate at will to pander to those who refuse to co-exist with these majestic and beneficial animals.

I call on the Forest Service to withdraw its plan to destroy the highly valued Heber wild horse herd and focus on PROTECTING and PRESERVING them for future generations as well as ensuring that those responsible for the spate of senseless killings of members of this treasured herd are brought to justice.