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Comments: Please read our opinion on the Heber wild horses which, in essence, is to leave the horses alone until a careful and thorough EIS and horse count study has been done. Do not move or sterilize the herd. And follow the law with regard to their care.

More specific points are as below:

These Heber wild horses have the right to have their territory defined as to where they are now and that includes the Heber Territory and the Black Mesa Ranger District and any areas that they roam in the Forest.

Wild Horses are to be protected by PL 92-195, the Wild Free-Roaming Horses and Burros Act of 1971 which states "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands. (This means where they are now, they should be protected in the forest which is considered public lands.)

The FS cannot remove these animals unless they determine them excess which can only be achieved through monitoring the habitat and determining "who" is damaging the habitat. (Understand that cattle are all throughout the forest in allotments and most often are the ones that damage the habitat.)

The Setting AML (Appropriate Management Level) is not a permanent number but a fluid number and must be determined by the health of the habitat which can only be done through monitoring the health of the land. Setting AML is illegal.

The numbers set by the FS of under 50-104 animals are not a viable number and illegal under the Act.

The use of fertility control drugs has deleterious effects on wild horses such as endocrine dysfunction. It causes permanent infertility in as short as 4 consecutive years (ISPMB's studies on two herds). No to any sterilizations or fertility control drugs. The FS must not do just an EA (Environmental Assessment) but must do an EIS (Environmental Impact Statement) because of the magnitude of all of the changes which are so immense that they will have a significant impact on the environment, and therefore an EIS is required, pursuant to NEPA (National Environmental Policy Act).

Leaving only two alternatives does not cover the complexity of the public's response and issues and is not compliant with NEPA. There must be more choices.

The law explicitly states "All management activities shall be at the minimal feasible level..."

Because the horses have not been disturbed in the forest since before 2006, this herd would be a great study group by a university. They have not doubled in size every four years as purported by BLM mantra. If so, there would be now nearly 3,000 animals as of today. The recent count was 450 animals.

In essence, leave the horses alone until a careful and thorough EIS and horse count study has been done. Do not move or sterilize the herd. And follow the law with regard to their care.

Thank you for your attention to our comments.