Data Submitted (UTC 11): 4/21/2021 6:46:34 PM

First name: Barbara Last name: Rasmussen

Organization: The Gila Herd Foundation of Arizona

Title: Founder/Director

Comments: I am submitting the following comments in opposition of the proposed management plan for The

Heber Wild Horses.

Setting such a low AML 50-104 horses is putting this herd in danger. If there were a catastrophic event such as fire or disease the herd could be decimated. The Forest Service is tasked to protect the herd and by setting such a low AML they are not accomplishing this.

Also the low AML does not coincide with scientific studies. The AML should be 150 to 200 animals to insure the herds genetic diversity or herd health.

Herd/band dynamics. The management plan must place a priority on preserving the natural behavior of the wild horses. This has been totally excluded from the plan.

These horses form a very complex social structure and removing/gathering to the proposed AML would destroy these social structures in the herd/bands.

In both the Management Plan and Environmental Assessment there is the continual mention of the degradation of resources due to the horses. No mention is given of the 100s of cattle grazing on the same land and the damage that occurs from their grazing patterns.

In the EA there is mention of social values being affected.

Due to the fact that if the horses are gathered and removed and only those few remain on the territory, viewing of these horses would be limited. People with handicaps would not be able to visit the forest to see the wild horses because of the access to the territory being limited.

On page 8 of the Territory Draft Management Plan, Year 1 these is mention of traps being set near Show Low and Lakeside area. Neither of these locations are in the territory so I fail to see the relevance of this statement being published in the plan.

Also mentioned is an Adoption process. The current process for wild horses is questionable in its efficacy to say the least. The horses are not protected after being adopted. This is evidenced by the number of horses run through auctions and being seen in killpens. A better more comprehensive program to protect the horses must be developed.

Again I want to reiterate that the agency is tasked to protect the horses and this is not being done on either of the documents.

I firmly believe that the proposed management plan contains too many flaws and more must and has to be done to protect and preserve this herd.

I am 100% in favor of Option 1 being utilized.

Thank you for the opportunity to comment on this.