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Comments: My comments are in regard to the Environmental Assessment (EA) issued by the Forest Service (FS) regarding the wild horses who reside in the Apache-Sitgreaves National Forest in Heber, Arizona.

First of all, the Heber Wild Horses have roamed in the forest since before the turn of the last century. They may represent one of the ONLY herds left in our country that have NOT been disturbed or rounded up for nearly 15 years. As a result, they represent one of the healthiest herds with strong social bonds and functionally healthy behaviors resulting from "leaving them alone." Wild horses know best how to limit their growth and survive when the elders remain in charge of their bands. This is happening with the Heber herd and they must be preserved and protected.

As mentioned above, the horses in the forest have not been disturbed, tampered with, or rounded up in 15 years, and yet they have NOT doubled in size every four years as purported by BLM. If so, there would now be nearly 3,000 animals as of today. The recent count was only 450 animals! This herd would and should serve as a great study group for a university.

The Heber Wild Horse herd, which FS, itself, describes as healthy and in good shape, is obviously doing quite well without any interference. It MAKES NO SENSE that the FS wants to reduce their numbers to 50-104 wild horses on 19,700 acres. At the high end, that would be one horse for every 394 acres! The number of horses proposed (50-104) is far too low to maintain the self-sustaining, genetically viable population of wild horses in the territory today. At the lower end of this number, wild horses are provided just 600 Animal Unit Months, while cattle are permitted 5,730 Animal Unit Months to graze within the Territory. The Forest Service MUST ADJUST LIVESTOCK USE in the Territory in order to give wild horses their fair share of the resource.

This AML (Appropriate Management Level) of 50-104 animals, set by the FS, is NOT A VIABLE NUMBER and illegal. An AML 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. Therefore, setting AML is illegal.

Wild Horses are to be protected by the Wild Free-Roaming Horses and Burros Act of 1971 (PL 92-195) 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. Therefore, 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.

Another factor to point out is that the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service MUST work harder to protect these federally protected wild horses from harm and to find the person(s) responsible. Also, the Forest Service should make every effort to relocate any of the horses found outside of the Territory boundary vs. immediate removal.

In addition, the FS cannot remove wild horses unless they determine them in excess, which can only be achieved through monitoring the habitat and determining "who" is damaging the habitat. NO ASSESSMENT HAS BEEN DONE, and needs to be done to acknowledge that cattle are all throughout the forest in allotments and MOST OFTEN are the ones that damage the habitat.

The FS must also do an EIS (Environmental Impact Statement). Because the magnitude of all of the changes are so immense, they will have a significant impact on the environment, and therefore an EIS IS REQUIRED,

pursuant to NEPA (National Environmental Policy Act).

The EA plan provides for fertility control to be used to control the population growth rate of the horses in the Territory. The Forest Service must consider the following: how the use of these options will impact the health of the herd when the population is maintained at such a small population; if it must be used (which it shouldn't), only PZP should be the preferred tool for use in the Territory, as it has proven efficacy for over 30 years; NO to any sterilizations and NO to IUDs, as they have not been proven humane or effective in wild, free-roaming herds and both sterilization and IUDs should be eliminated from further analysis.

If removals must occur within the Territory, they should be done exclusively through bait-trapping and OVER TIME, to meet adoption demand and ensure that the Forest Service does not add to the thousands of wild horses already in off-range holding facilities across the country.

Lastly, having only two alternatives (roundups to reduce herd size and use of fertility control) does not cover the complexity of the public's response and issues and is not compliant with NEPA. There MUST BE MORE CHOICES.

These magnificent forest horses play an important role in the forest environment by keeping fires down and contributing to the biodiversity of the eco-system. These plans of the FS cannot be made lightly, and all factors must be considered - especially the fact that this herd has managed fine on their own for the past 15 years.

Please consider all the points mentioned above. Americans love their wild horses. It's time they are managed responsibly and not to appease special interests. In most cases, livestock need to be managed - not the wild horses. Thank you.