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Comments: To Whom it May Concern,

My issues with the Heber Wild Horse Territory Management Plan: Draft Environmental Assessment are below:

1) The Draft assessment sets the upper and lower limits of the wild horse herd based on the ability of the territory to support that number of animals; however it does not address the stability, including genetic diversity, of the wild horses once the numbers are culled to those limits.

2) The Draft Assessment states that the horses will be removed (pg 22) if they occupy areas outside their 'designated' area; however the assessment does not address provisions for determining why horses are grazing outside their designated area or actions to be taken to encourage horses to occupy their designated area.

3) The Draft Assessment also indicates that horses will be removed if it is determined that their genetic diversity is decreasing (pg 22); however the onus is on the management that the horses allowed to remain have the ability to maintain genetic diversity.

4) The Draft Assessment indicates horses will be removed if the vegetation, habitat, and/or horses' health is declining. Furthermore the Draft Assessment indicates livestock grazing will increase to 35%; however an adaptive management strategy will be implemented (pg 51) However, the assessment does not outline the priorities of the adaptive management plan. My concern is that livestock will be given priority over the wild horses when deciding to cull horses or cut grazing.

5) I am concerned that the 'census' in 2017 combined with 'observers' in 2019 and 2020 does not truly reflect the numbers of horses on the land (and thus the estimation of horses that will be culled).

6) There is no mention in the draft assessment of the fate of those horses deemed 'excess'.