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Organization:

Title:

Comments: The Apache Sitgreaves National Forest Environmental Assessment proposes to reduce the herd to only 50 horses. Under any scientific analysis, this means that the herd will become inbred and weak. I believe it is unscientific and in violation of the USFS statutory mission if USFS proceeds with the removal of these horses. I am dismayed that the Heber wild horses are being attacked in such a manner. My specific comments are as follows:

1. The E.A. fails to consider increasing the low AML (Appropriate management level) rather than the easy (but ignorant) removal approach. Indeed, the EA admits that previous public comments primarily were about the AML that was determined by merely counting the available forage in the WHT (Wild Horse Territory) of 19,000 acres even though most of the horses live on 300,000 acres outside of the territory. The claim that the territory is not hospitable is wrong since horses are fenced out of large portions of the territory and the horses are doing well.
2. The E.A. fails to adequately analyze the detrimental effects to the Heber wild horse herd if the number of 50 horses is achieved, and that number would be unsustainable, leading to inbreeding, an inadequate number for herd safety and protection from elements and predators, and other vulnerabilities.
3. The E.A. fails to consider the option of reducing livestock grazing within the WHT despite the fact there livestock grazing occurs throughout the Apache-Sitgreaves Forest outside of the WHT.
4. The E.A. considers using PZP after removing almost all of the wild horses but fails to consider humane fertility control as a means to stabilize and reduce the CURRENT herd numbers; that failure is unscientific and contrary to the USFS mission.
5. The E.A. considers several inhumane and wrongful methods of birth control (e.g., gonacon and iud's) that should be dropped immediately from consideration since they do not preserve natural herd behavior; indeed, these considered methods only serve to demonstrate the failure of USFS to consult with qualified scientists.
6. These are OUR public lands and the majority of the population of the U.S. wants wild horses to be on our public lands. USFS serves the PUBLIC interest and I am a member of the public.

I care deeply about the Heber wild horses and believe that the Heber wild horses MUST be preserved and humanely and scientifically managed through PZP fertility control measures.

Thank you for listening to my concerns.