Data Submitted (UTC 11): 4/22/2021 2:55:14 AM
First name: Diana
Last name: Dring
Organization:
Title:
Comments: I strongly object to the U.S. Forest Service's Territory Management Plan for the Heber wild horses, the unique band of horses within the Apache Sitgreaves Forest in northern Arizona. This plan will decimate this historic population of these iconic animals, leaving only 50 to 104 horses on nearly 20,000 acres of public land, while the agency permits thousands of cattle to graze within the horses' habitat!

Even at high AML, that's only one horse for every 394 acres! This range is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

With the new AML, at low AML 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 to give the wild horses their fair share of the resource.

The last population survey in the Territory found that many of the horses were outside of the Territory boundary. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.

The 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 how:

(1) the use of these options will impact the health of the herd when the population is maintained at such a small population.

(2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.

(3) IUDs have not been proven humane or effective in wild, free-roaming herds and 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.

Finally, 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.

The Forest Services true job is to facilitate humane treatment that supports the well being of America's wild horse populations, not to kowtow to the special interests of cattlemen who's main purpose is to assure themselves cheap grazing at the expense of environmental balance.

I urge you to cancel these inhumane and unfair plans to reduce this herd so drastically below a reasonably sustainable population size.

Thank you.