

Data Submitted (UTC 11): 4/22/2021 2:43:16 PM

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Comments: Thanks for allowing me to comment.

It would appear that this EA failed to provide enough documentation, including but not limited to official surveys, notes, maps, photos, and scientifically supportable and unbiased reasoning, for the proposed boundary of the Heber Wild Horse Territory as shown in the USFS EA proposal map. It is undocumented and unrealistic to presume they were only present in 3% of the territory when the AWFHBA was implemented, in a total area of 818,000 acres. The EA did not substantiate with enough data and did not provide the official survey done 1971-1974 showing the presence of horses prior to those dates and in the absence of this data assumptions as to the range of horses in the territory cannot be made simply because a territory has been arbitrarily assigned and partially fenced. At this time the horses still roam throughout the areas that are accessible to them. Their allotted territory needs to be expanded to where the horses were known to roam prior to 1971. The low AML (which is also a figure arrived at arbitrarily and not following the science of the 2013 NAS report) is not genetically viable and is not supported by the general public.

Restricting the horses so severely is no doubt a political accommodation to local ranchers using the grazing allotments and other public resource consumers with a monetary interest. 37 horses have been targeted and shot in the past three years and no one has been held accountable particularly as the AWFHBA 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 [in 1971 when the law went into effect], as an integral part of the natural system of the public lands." This statement is the same for their protection on the entire territory and not restricted to 3% of it. To make matters worse for the horses this area of land is not even accessible to the horses in all areas due to cattle pasture/allotment fences. Horses are blamed for the degradation of the land around water holes but everyone knows it is the cattle that don't leave the water source and cannot even walk to water if it's not in the vicinity. Horses will drink and take off foraging for the day. But the FS seems to not have a clue as to why the horses are not in all areas of the Territory in which they merely drew an outline on a map to appease a few special interests. Thank you for your consideration.

Respectfully submitted.