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Comments: Below are my comments regarding the HWHT management plan:

1.) "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death;"

The Forest Service management plan fails to address how they will protect the few horses they leave in the forest from capture, harassment, or death. As you are aware, there have been three January killing sprees in a row which resulted in the deaths of dozens of horses. There must be a plan on how they are to be protected moving forward.

2.) Wild horses are a public resource under the law, not a permitted use for private profit. A Herd Management Plan is key to the health and survival of the Heber herd. Removal is not management. Transparency MUST be a baseline in planning and execution of any actions with regards to how the Forest Service operates. The Forest Service uses an exaggerated and failed method to calculate population growth of the Heber herd. Using the population of 200 horses provided by the Forest Service in 2002, if the growth rate were 19.5% per year as the Forest Service claims, there would presently be 5,902 horses in the Heber herd. The Forest Service itself estimates the current herd population to be 270-420 horses. The Forest Service population growth numbers are highly inflated. Is this an attempt to show urgency to reduce the herd population as fast as possible?

A more than 20 year history of the Heber herd, including their own population estimate, shows their (Wild Horse Territory WinEquus Population Modeling Analysis) is just another fail. The flaws of this type of analysis was pointed out by the 2013 report made by the National Academy of Sciences (NAS) to the Bureau of Land Management. According the the NAS, "On the basis of information provided to the committee, the statistics on the national population size cannot be considered scientifically rigorous." Also stated by the NAS, "Input parameters used in the WinEquus Model are not transparent, and it is unclear whether or how results are used in management decisions."

The Forest Service method of establishing, monitoring, and adjusting AML numbers is:

a.) not transparent to stakeholders;

b.) is not supported by evidence-based science, and

c.) is not amenable to adaption with new information and environmental and social damage.

Continuing to follow a flawed analysis method is a detriment to the Heber herd and shows the Forest Service does not believe in transparency, as there has never been a planning process to establish accurate numbers.

3.) THE WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971 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."

While the EA provided some opinions it provided no factual evidence that there were only 7 horses in the Sitgreaves in 1971 when the Wild Free-Roaming Horses and Burros Act became law. The EA failed to show

pertinent information such as:

a.) the name and title of the person who made the final decision to designate that particular area as the legal Territory;

b.) the method and dates and people responsible for the "inventory" that resulted in the Forest Service claiming there were only 7 wild, free-roaming horses in the Sitgreaves in 1971;

c.) survey data of the Territory area they decided upon; and

d.) an explanation as to why they determined that area as the Territory.
The Forest Service is basing their Heber wild horse plan on an unrealistic piece of land they are calling a "territory," although by law, the TRUE territory where the Heber herd are legally allowed to live and be protected is the ENTIRE Apache Sitgreaves National Forest.

§ 222.60 Authority and definitions.
Authority. "The Chief, Forest Service, shall PROTECT, manage, and control wild free-roaming horses and burros on lands of the National Forest System and shall maintain vigilance for the welfare of wild free-roaming horses and burros that wander or migrate from the National Forest System." (13) "Wild free-roaming horses and burros mean all unbranded and unclaimed horses and burros AND THEIR PROGENY THAT HAVE USED LANDS OF THE NATIONAL FOREST SYSTEM ON OR AFTER DECEMBER 15, 1971 OR DO HEREAFTER USE THESE LANDS AS ALL OR PART OF THEIR HABITAT."

This is the LAW. The Forest Service just SAYING the small 19,700 acres is the territory is not true. The Forest Service has no proof that it is. Again, transparency is key and lacking in the Plan.