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I hope you see the irony in the 4/22, Earth Day, deadline for comments on the Environmental Assessment and Management Plan for the Heber Wild Horse Territory. Had I submitted and tried to defend this document during my college years, I'd not have a degree in range management today.

The Forest Service team compiled this TMP without current or verifiable data on herd size, herd composition or age range. Population estimates vary from 500 to, more likely, around 240 horses on nearly 20,000 acres of PUBLIC LAND. FS reports the wild horse population from '93 through 2000 as zero, admitting that "inventories were not conducted." Then estimates a reproduction rate of 20% to arrive at the seemingly arbitrary number of 50 to 104 horses for a "self-sustaining population of healthy animals." Never mind that 150 to 200 horses is the minimum required for genetic viability as recommended by the BLM Wild Horse and Burro Handbook (Cothran, 2009). FS also fails to adequately analyze the detrimental effects to the Heber horses if their numbers are reduced to 50, leading to inbreeding and leaving the herd vulnerable to predators, the elements and further decline through attrition and illegal poaching.

FS cites the severe shortage of forage following the Rodeo-Chediski fire and long-term drought as justification to reduce horse herd numbers. At low AML, wild horses are provided just 600 AUM's with cattle permitted at 5730 AUM's within the Territory. While the capture and removal of wild horses is the main tenet of the TMP, commercial livestock numbers are being increased from 25% to 35%, with roughly 900 head on a single allotment.

The last aerial survey (2017) of the Territory reported that many of the horses had ranged outside of Territory boundaries. Unlike cattle, horses free roam for forage and water, greatly reducing negative environmental impacts. FS approved livestock fencing crisscrosses the Territory, limiting natural roaming behaviors and forcing the horses to go off the Territory for forage and water. Claims that the Territory is inhospitable are incorrect since FS has literally "fenced out" the horses from their federally designated range. Instead of immediate removal, FS must make every effort to humanely relocate the horses back within the boundaries. Preventing the horses from accessing their entire Territory should not be grounds for removing horses or lowering the AML to the nonviable, non-variable number of 50 to 104 horses.

The Heber Wild Horse Territory was established in 1974 under the '71 Wild Horse & Burro Act. The Territory designation mandates that wild horses get principal use of areas where they were found in 1971. Yet, the Territory overlays five permitted allotments where horses are fenced out and the detrimental impacts of commercial livestock (over)grazing are ignored. The EA cites overgrazing by horses as justification for their removal while stating that "low utilization levels indicate that the use of the territory, by all grazing animals, over the past ten years has been within the forage-producing capability of the area." FS goes on to promote livestock grazing as a "multiple use" obligation to ranchers which contravenes the Territory's principal use mandate. The EA/TMP wrongly fails to consider the option of reducing commercial livestock grazing within the Territory or exercising termination rights in the grazing leases. "If necessary to provide habitat for wild horses or burros, to implement herd management actions...the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock." FS is authorized by the Wild Horse & Burro Act to create a Heber Wild Horse Sanctuary and remove all livestock from the Territory since that is what is needed to manage this herd as a "self-sustaining population."

Sans any current data on natural attrition, the TMP provides for fertility control of horse numbers in the Territory.

These include field spaying and IUD's, neither method approved as humane or effective by veterinary professionals. As stated, "the proposed action is designed to foster...healthy animals within the designated territory." The National Academy of Sciences has determined that "preserving natural behaviors is an important criterion" for wild horse management and it has been established that ovaries produce hormones necessary for both natural "wild" behaviors and herd well-being. PZP has, over 30 years, been proven effective, is relatively inexpensive and should be the preferred method to control herd numbers only if verifiable, unbiased science shows it to be necessary.

In the past four years, over 30 Heber wild horses have been shot by an unknown individual(s), the most recent slaughter in January. The shootings have ranged from a single horse to killing entire family units, which impacts herd integrity. Yet this plan fails to proffer a solution for the continued shooting, harassment, rustling and luring of the horses with feed, salt or water onto forest roads where they are hit by vehicles. To quote a published statement from the Central Oregon Wild Horse Coalition "...when the Apache Sitgreaves National Forests failed to conduct substantive investigations until forced by Congressional intervention, it suggests a systemic disregard for the welfare of these horses..." Personally, I call it complicity.

Finally, the decision to remove "excess" horses should be made by a diverse committee of stakeholders, including wild horse advocates, PUBLIC LAND owners and recreators, i.e. tax paying citizens, and private land owners. ( I offer my service in all three categories.) The current system, which places the decision in the hands of one individual, promotes the status quo, no matter how detrimental to the Heber horses, and allows for an abuse of authority with no checks in place.

The acceptance of this EA and implementation of this TMP for the Heber Wild Horse Territory will not "foster a self-sustaining population of healthy animals within the designated territory, in a thriving natural ecological balance as part of a functioning ecosystem with other ecological values, land management uses, and within the productive capacity of their habitat." Expect law suits.