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Title:

Comments: Comments on the 2021 Heber Wild Horse Territory Plan #18916

First, I want to congratulate you on your success in making good progress toward meeting many of your goals stated on page 3 for achieving the "desired ecological conditions" in the Heber Wild Horse Territory (WHT).

For example, I am very pleased to see the following progress since the last Heber WHT Management Plan (2020):

\*"Desirable grass species are healthy, vigorous, diverse, and achieving maximum production for their mapping units," (pages 3-4)

\*"Soil and watershed conditions are satisfactory or approaching satisfactory on capable and potentially capable rangeland." (page 4)

\*"Soil and watershed conditions are satisfactory or approaching satisfactory on capable and potentially capable rangeland." (page 4)

\*"Herbivore grazing is not contributing to reduced water quality from sediment or other non-point source pollutants." (page 4)

\*"Wild ungulate, permitted livestock, and horse use does not exceed the estimated grazing capacity." (page 4)

\*Structural range improvements are well maintained and in good condition. (page 4)

\*Dependable water sources are well distributed. Occupancy by unauthorized livestock is minimized."(page 4)

\*"As detailed in the Proposed Appropriate Management Level Determination document, there are generally enough water sources within the territory to keep horses watered year-round. Limiting factors may occur in times of extreme drought." (page 4)

In fact, you have made so much progress in achieving (or approaching achieving) many of your goals, that the "Criteria for Determining Excess Horses" do not seem to exist at this time. Or at the very least, do not justify the tax-payer expense of removing (and then transporting and maintaining in holding facilities) any Heber wild horses to meet current low AML.

However, I would like to make the additional following comments on this management plan.

Comments on Appropriate Management Levels (AMLs):

I see that you have not increased the originally proposed AML of 50-104 horses since the last round of comments for this WHT. Thus, I still strongly object to the proposed AML for the Heber Wild Horse.

You state that one of your reasons for removing horses is a concern over inbreeding, but the absolute minimum number required for genetic viability is 150 according to the BLM Wild Horse and Burro Handbook, Cothran, 2009).

I find it heartening that you are interested in maintaining genetic viability in the herds, however, reducing the number of horses that are available for mating obviously will INCREASE, not decrease, inbreeding.

Therefore, I strongly urge you to raise the AML to at least the absolute minimum required for genetic viability, which is 150 horses, per the recommendation in the BLM Wild Horse and Burro Handbook, Cothran, 2009).

Regarding the "second-tier analysis" process used in determining AML, I strongly recommend that you adjust

downward (significantly reduce) future livestock grazing levels.

As you know, you are authorized by the 1971 Wild Free-Roaming Horse & Burro Act (Public Law 92-195) to create a Heber Wild Horse Sanctuary and remove ALL livestock from the Territory. So, you already have the legal authority to remove whatever number of livestock is needed to offset the number of horses you currently propose to remove in order to promote and maintain a thriving natural ecological balance in the WHT.

I have no idea how soon current grazing permits will expire, but reducing the number of livestock allowed to graze in this legally designated Wild Horse Territory now would be beneficial to wild horses, other wildlife, and all other affected parties, except for livestock owners. (Don't get me wrong-I am an avid beef-eater, but the really good stuff (prime meat) is not derived from neglected cattle fending for themselves in the wild competing with other herbivores for not-so-great forage.)

Going forward, I strongly propose that you reduce the number of livestock allowed to graze in this territory as grazing permits expire to enable wild horses to remain in this WHT permanently. For the present, I urge you to simply accept the current number of horses in this WHT and patiently wait for PZP birth control to curb population growth.

However, if there is a drastic and urgent need to reduce the number of grazing animals in the WHT now or in the future, then remove whatever number of livestock is necessary to meet that need, as authorized by the 1971 ACT.

And, finally regarding AMLs, I would like to add that the National Academies of Science (NAS) concluded that the concept of Appropriate Management Levels (AMLs) was entirely arbitrary and had no basis in science. Specifically, in its June 5, 2013 report, "Using Science to Improve the BLM Wild Horse and Burros Program: A Way Forward," NAS concluded that "How Appropriate Management Levels (AMLS) are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change."

Comments on Population Control/Fertility Reduction:

Re: Determination of and Criteria for Determining Excess Horses

Given the statements made on pages 3 and 4 of this WHT Management Plan indicating that there are "satisfactory or approaching satisfactory" overall rangeland health conditions and "well distributed," and "dependable water sources" in this WHT, there does not seem to be any basis for claiming that there are ANY excess wild horses here. In addition, it also clearly states that "(wild) horse use does not exceed the estimated grazing capacity."

Re: Removal of Excess Wild Horses

At this time, I see no justification for a determination of "excess horses." However, I am pleased to see that if/when removals actually are needed that the default gather technique will be bait trapping.

Removals should be avoided because they only make the situation worse. "Population" experiments have been done for years (mostly on rats, but we're all mammals) that indicate that animals will continue to breed as long they have the conditions (space, food, etc.) that support continued growth - that is, any given population will try to fill its available space. Consequently, sudden reductions in populations always cause increased breeding activity, way above the "normal", as the remaining population tries to replenish its prior numbers. Seems strange, but true (scientifically validated).

In addition, removals should be avoided since they inevitably result in "disposal": "Any branded or previously domesticated animal captured will be handled under regular impoundment and disposal procedures." (page 10)

Re: Fertility Reduction:

PZP should be the only population management technique used. It is the only one that has been deemed "safe" for mares by thorough research. (I understand that the term "pesticide" ignorantly associated with PZP is only due to the lack of a more precise designation from the FDA for PZP.)

Mares should NOT be spayed, period. This procedure is almost never performed on domestic horses; it is almost impossible to find a respectable vet that will perform this highly dangerous procedure.

Re: Relocation:

Relocation is a good idea if it's absolutely necessary. You can eliminate the costs associated with interstate relocation by relocating gathered horses to another territory within the same state.

Additional Comment:

I would like to add that the stated overall goal of the territory management plan is "to encourage horses to utilize the designated territory rather than remaining on other areas on the national forest, while allowing for multiple uses and having a thriving ecological balance." If this is true, fencing issues should be addressed and they have not been included in this management plan.

Fencing that is preventing wild horses from entering and utilizing this WHT should be removed. Horses suffer from being fenced off from water sources during periods of drought and there eventually are always periods of drought in this area.

In closing I would like to mention that this Forest Service land is legally designated as a wild horse territory. Use by livestock, even though permitted, is not its designated purpose and should not be allowed to become its primary use.

Permits should not be renewed or issued when there are signs of rangeland degradation. Livestock do at least as much "damage" to rangeland as horses (and burros, and elk, etc.). However, the number of livestock grazing in the Heber Wild Horse Territory vastly outnumbers the small number of horses living there. I believe there are almost ten times as many cattle as horses in this WHT.

Thank you for your thoughtful consideration of my comments.

Sincerely,  
Judith