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Comments: April 22, 2021

M. Stephen Best, Forest Supervisor

Heber Wild Horse Territory

PO Box 640

Springerville, AZ 85938

Re: Heber Wild Horse Territory Plan Draft Environmental Assessment

Mr. Best:

As an American citizen and descendant of pioneer settlers of the West, I appreciate the opportunity to comment on the Draft Environmental Assessment for the Heber Wild Horse Territory Plan. Our National Forests and wildlife, including our wild horses, are precious resources which belong to all of us.

Having lived in the Southwest for some years and visited Arizona numerous times, I know the exceptional beauty and significant resources of Arizona, and the importance of protecting those unique resources. The work of our public servants is invaluable, and greatly appreciated, in this regard.

Key issues in the EA Draft Plan that I would like to address have been covered by a number of commenters, but I would add my support and thoughts to those comments as follows:

The proposed plan sets the AML at 50-104 wild horses. This not genetically viable and will lead to significant problems. You know the genetic science. The population modelling utilized is flawed and exaggerated. It does not reflect the real population levels or growth rate. And studies of that rate, historic population, and genetics of these horses have not been done.

The reports state that at the current population, there is quite adequate forage and water to sustain what is actually a small population for the Territory that is supposed to be designated. The report repeatedly predicts dramatic population increases that theoretically would decimate the ecosystem. But data does not support those leaps of logic.

There are issues with the territory area boundaries and fencing which others have detailed, these need to be addressed satisfactorily.

I realize this is a political hot potato, but allowing livestock grazing within the WH territory must be reviewed. And the USFS needs to consider the overall public interest rather than routinely giving the livestock industry priority. While the Socioeconomic Report was valuable to read, and seems quite well done, I would like to support the questions raised by The Cloud Foundation about the "Ethnographic Study". I studied cultural anthropology, and was pleased to see that ethnography was utilized, however, I am perplexed by what is included in the public documents. Is there a full study? Could it not be made public? Ethnographies have well developed methodology which include qualitative and quantitative analysis. Were these done, and could that be made public? The criteria for the interviews and the way they are presented seem to mainly reveal bias on the part of the study and interviewees, but if there is more of the study, it might give better context.

In summary, there are significant questions regarding some basic assumptions made in this assessment; which seem based on shaky methodology, data, leaps of logic, and appear fundamentally flawed in the bias towards serving livestock grazing interests over long term public interest.

I would like to see a better, revised plan proposal developed which involves some of the well informed input you

are receiving. The value of protecting these vulnerable and disappearing wild horse herds needs to be recognized.

Thank you again.

Penny Margaret Jackson