

Data Submitted (UTC 11): 4/23/2021 4:16:54 AM

First name: Kim

Last name: Sheppard

Organization:

Title:

Comments:

The current plan proposed by the United States Forest Service to remove and/or sterilize members of the Heber Wild horse herd in the Apache Sitgreaves National Forest is an inappropriate, deleterious, harmful plan. Beyond animal health issues associated with gathers and invasive procedures in non sterile environments, managing healthy wild herds includes genetic viability, resulting in healthy offspring from genetically viable herds.

The Heber wild horse herd bands and offspring are generally indistinguishable from the wild horses on the Fort Apache Reservation. The Heber wild horse herd bands wander over vast expanses of land and do not and have not ever stayed within a 19700 acre area. Rather, the land they actually have roamed since the 1920's spans over 320,000 acres. A natural part of migratory wild horse behavior is the exchange of genetics:

"By encouraging offspring to leave the band, wild horses avoid inbreeding. It's interesting to note that most wild horses are more genetically diverse than any of our domestic horse breeds. In other words, they are more able to deal with changing conditions and environments over time and can resist extreme drought or cold better than their domestic cousins."

<http://netnebraska.org/basic-page/television/wild-horses-herds-and-harems>.

This is again why the current proposed plan to remove and/or sterilize members of the Heber Wild horse herd is an inappropriate, deleterious, harmful plan.

These Heber Wild horse herd bands wander deep into the pine forest and many rugged terrain areas and can be seen on 260, coming into town, as well as Forest Road 50 (near the ranger station) to the Mogollon Rim Road (Route 300), which circles back to Route 260. Additionally they can be seen by Black Canyon Lake where they come down to that area to drink. They can also be found from Route 50 to Route 300, in several open areas with downed trees, that are remnants of the 2002 Rodeo-Chediski fire.

It is in this area that the Navajo Board of Supervisors had concerns that the increased number of free-ranging horses was adversely impacting the recovery of the 2002 Rodeo-Chediski Fire burned lands.

Despite that there were cattle being grazed on the land (currently there are between 2,000-3,000 1,100 lb cattle (some lactating), mule deer and thousands of elk that have historically roamed this area and it is impossible to determine "which" animals most monopolize forage, personnel advertised a contract to illegally remove the wild horses they called "livestock" that were accessing the fire-damaged area (because it was part of the lands the Heber wild horse herd bands have roamed since the 1920's, as explained above.

(Wild or sometimes coined "feral" horses cannot and do not ever meet the criteria for livestock in the Federal Law Definitions. Hence they are not livestock and as such, applicable non livestock animal welfare protections would apply once rounded up, including for them not to be shot or sold for slaughter, either by Forest Service or those allowed by Forest Service to remove them.

The Heber Wild Horse Herd is a protected herd under the THE WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971 (PUBLIC LAW 92-195). Forest Service was not only illegally advertising/ authorizing the removals of Heber wild horses, they were allegedly paying the ranchers to do so.

The ASNF wrote on its website:

"The number of horses posed a threat of resource damage to burned areas recovering from the fires, the horses created conflicts with other landowners and users of the Forest lands," . This is managing for monopoly land use, not managing the Heber Wild Horses for healthy herds or equitable use.

Further, although a lawsuit was filed and forest officials were restricted from proceeding with any further illegal gathering of migratory Heber wild horses, by 2014, USFS' own website listed the Heber population as 18, with AML being non applicable (N/A) on 19,700 acres, which is only part of the the 320,000 acres they have roamed since at least the 1920's. By 2017, the number of Heber wild horses was 420 and then the shootings reduced that population number by at least 30.

The issue with the Forest Service's current plan in translocating horses is that it violates its own policy found in their manual. Additionally, there had been NO baseline genetic analysis or DNA done for this herd. Hence, the Forest Service cannot say with any proof that this Heber herd is not genetically unique.

They are in fact, unique, having phenotypical (physical characteristics) that are known to be older "Spanish" traits, such as primitive leg barring and/or dorsal stripe, thicker neck, shorter more squared head, and a more muscular chest and fore limbs, than seen in domestic breeds. Also, these horses have retained the shorter stature of generationally wild horses, as opposed to a herd that has more infusions of outside domestic traits, including taller Warmblood or other types.

In addition to the Forest Service's current inappropriate and deleterious plan to remove and/or sterilize over 300 Heber wild horses from the land that has been their home since at least the 1920's, there are NEPA violations that pertain to their deviation from the process they are to follow. By its omission of Citizens Against Equine Slaughter's (CAES) multiple page scoping public comments and 3 personal affidavits, the Forest Service has not only violated its own policy of addressing CAES's substantive comments, it has also caused the unavailability of dozens of reference materials to the public in order for them to make their substantive comments that the Forest Service would then need to read, consider and address. Both of these are serious NEPA violations. NEPA is the National Environmental Protection Act. It clearly outlines the rules and steps a federal agency must adhere to in creating, and finalizing these plans and we would expect ASNF personnel (USFS et al.) to follow them.