Data Submitted (UTC 11): 4/23/2021 6:18:57 AM
First name: Adela
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Organization:
Title:
Comments: I'm dismayed & heartbroken over USFS's plan to decimate the iconic Heber wild horses, which have been living in northern AZ for over a century! Not only has this herd been the target of ruthless & senseless shootings in the recent years, but now the agency charged with protecting is threatening a mass removal, which will decimate the herd population! Meanwhile, USFS permits thousands of head of cattle to graze within the horses' habitat!

This plan of mass removal is wrong, inhumane & unwarranted and fails to treat the Heber wild horses fairly:

(1) The plan sets the Appropriate Management Level (AML) to an unnatural & extremely low number - just 50-104 wild horses on 19,700 acres. Even at high AML, that's one horse for every 394 acres! This range is far too low to maintain a self-sustaining, genetically viable population of wild horses in the territory.

(2) With the unnaturally small population size, wild horses will be allocated an unfair share of resources within their public land habitat - just 600 Animal Unit Months of forage per year, while cattle are permitted 5,730 Animal Unit Months to graze within the territory. Therefore, USFS must adjust livestock use in the territory in order to give wild horses their fair share of the resources.

(3) The last population survey in the territory found that many of the horses were outside of the territory boundary. Instead of immediate removal, USFS should make every effort to relocate those horses within the boundary.

(4) The plan provides for fertility control to be used to control the population growth rate of the horses in the territory. USFS must consider the following:

a. How the use of these options will impact the health of the herd when the population is maintained at such a small population.
b. PZP has over 30 years of proven efficacy and should be the preferred tool for use in the territory.
c. IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

(5) It is harmful & inhumane to roundup hundreds of wild horses with helicopters, separating them from their families, and sending them to overcrowded federal holding facilities where they will languish. If removals must occur, they should be done exclusively through bait-trapping and in small numbers over time, to meet adoption demand and ensure that the horses do not end up in undesirable places, and to avoid adding to the thousands of wild horses already in off-range holding facilities across the country.

(6) Finally, USFS has failed to protect the Heber wild horses, which have been the target of illegal hunting since 2018. Instead of spending taxpayers' money to eliminate wild horses, USFS must work harder to protect these federally protected wild horses from harm and to find the person(s) responsible.

I am asking for an updated management approach that keeps the magnificent wild horses on public lands for the public to enjoy, provides them with fair share of forage & water resources, and manages their numbers humanely with PZP fertility control.

Also, I am begging you to PLEASE DO NOT DESTROY THIS ICONIC BAN OF WILD HORSES…it's cruel & unjustified and would be a devastating loss for the community & public! Thank for your consideration.

Sincerely,

Adela Turi

PS-Your notice states that comments are due by 4/22/21 (midnight) which is confusing. I'm submitting my comments around 11:25 pm on 4/22/21 35 mins before midnight!