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Organization:

Title:

Comments: Objection to the Heber Wild Horse Territory Management Plan

To:

Michiko Martin, Reviewing Officer

Attn: Administrative Review Staff

USDA Forest Service, Southwestern Region

333 Broadway SE

Albuquerque, NM 87102

Dear Reviewing Officer Martin,

I am submitting this formal objection to the Heber Wild Horse Territory Management Plan on the Sitgreaves National Forest.

I am a photographer, a long-term observer, and an advocate for the Heber herd. For over thirteen years, I have traveled to the Heber area solely to witness and document the wild horses. My visits contribute to the local economy through cabin rentals, dining, and fuel purchases, yet my true investment is in the preservation of the land's spirit and its living heritage - the wild horses themselves.

1. Identification of Objector

Cheryl Voss

203 N. Lincoln St.

Wanatah, IN 46390

Signature: Cheryl Voss

2. Project Information

Proposed Project: Heber Wild Horse Territory Management Plan

Responsible Official: Michiko Martin, Regional Forester, Southwestern Region

National Forest: Apache-Sitgreaves National Forests, Heber Ranger District

3. Objection Summary and Supporting Reasons

This objection is not simply about procedure, but about truth - the truth that the Heber herd exists as part of the Sitgreaves, past and present; that memory and presence cannot be expunged; and that the law requires us to honor, protect, and preserve wild horses "where presently found" in 1971 - where they remain today.

A. Improper Territory Boundary

When Congress passed the Wild Free-Roaming Horses and Burros Act of 1971, it mandated that wild horses be protected "where presently found." Instead of honoring this, the Forest Service drew a boundary of just 19,700 acres - a small fraction of the area where horses historically roamed. Oral histories, historical maps, and Forest Service records all confirm that horses have long inhabited a much wider range throughout the Sitgreaves National Forest.

This arbitrary boundary reduces the horses' legal protections and allows the agency to justify removals based on an artificially small range. To comply with both the letter and spirit of the 1971 Act, the Heber Wild Horse Territory boundary must be corrected to reflect the horses' true historic range.

B. Reliance on an Invalid Population Baseline

The management plan rests upon a deeply flawed foundation - a "purported" 1973 census that the Forest Service itself has acknowledged was never properly conducted. Freedom of Information Act records confirm no scientific survey was carried out, despite the Bureau of Land Management's established census methods being available at the time. The agency's own documents describe the number as "purported," meaning it cannot serve as a valid baseline for modern policy decisions.

Basing today's removals or population limits on this unverified number undermines both scientific integrity and public trust. The plan must be reconsidered using legitimate, peer-reviewed data.

C. Environmental and Cultural Integrity

The Heber herd is an integral part of the Sitgreaves ecosystem. They coexist with elk, deer, and predators in a natural balance that should be studied - not disrupted. By contrast, the same lands are heavily grazed by cattle from private ranchers operating under low-cost federal permits, consuming the very forage the horses are blamed for using. This imbalance must be addressed with fairness and transparency.

The Heber horses are part of the spirit of this land - a living legacy tied to its cultural identity, biodiversity, and public enjoyment.

4. Suggested Remedies

1. Expand the Heber Wild Horse Territory to include the full area historically and currently occupied by the herd, consistent with the intent of the 1971 Act.

2. Designate the Heber herd as a National Study Population - the only known herd in the United States never subjected to removals or fertility control.

- This would allow independent scientists to study natural reproduction, social behavior, and ecological balance.

- It would also align management with Congressional intent to learn from free-roaming herds and reduce long-term taxpayer costs.

3. Suspend any removals or population reductions until legitimate population surveys are conducted using modern scientific methods.

5. Connection to Prior Comments

I have submitted prior written comments on this issue as a long-time observer and advocate of the Heber herd. My comments emphasized the need for accurate data, fair territorial boundaries, and compliance with the Wild Free-Roaming Horses and Burros Act. This objection builds directly on those earlier submissions and observations.

Conclusion

The Heber wild horses represent more than numbers on a page. They are a living part of the Sitgreaves landscape - resilient, social, and self-regulating. Their continued freedom provides an irreplaceable opportunity for science and a reminder of our responsibility under federal law to protect what is truly wild.

The current plan's reliance on an invalid census and its disregard for historic boundaries place the Forest Service at odds with the law's intent and the public's trust. I urge you to uphold the truth of this land - to ensure the Heber herd is protected, studied, and allowed to live freely where they have always belonged.

Respectfully submitted,

Cheryl Voss

Photographer, Advocate, and Long-term Visitor to the Heber Horses