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First name: Ginger
Last name: Ritter
Organization: Arizona Game and Fish Department
Title: Project Evaluation Program Supervisor
Comments: Attached are the Arizona Game and Fish Commission's comments on this proposed action.

The Arizona Game and Fish (Department) has appreciated the ongoing interaction with the Apache-Sitgreaves National Forest (Forest) in development of the Heber Wild Horse Territory Management Plan Draft Environmental Assessment (EA). As a cooperating agency and member of the Interdisciplinary Team (IDT), the Department has worked closely with the Forest providing input and comment for this draft EA. The Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority for management of the state[rsquo]s wildlife resources, as well as safe watercraft and off-highway vehicle recreation, for the enjoyment, appreciation, and use by present and future generations. In order to further our commitment to these resources and our constituents, the Commission offers the following comments regarding the draft EA. It is the intent of these comments to aid the Forest Service in developing consistency with the direction contained in the Wild Free-Roaming Horse and Burro Act of 1971 and Congressional intent in this legislation.

The Commission has concerns regarding the lack of clarity in the draft EA of thresholds, i.e., triggers that would cause the Forest to initiate actions to reduce the herd. The establishment of an Appropriate Management Level (AML) as described in the EA [ldquo]is the upper limit of horses which results in a thriving natural ecological balance and avoids deterioration of the range[rdquo]. Population survey estimates from 2017 and earlier indicates that the population is between 250-420 animals, already exceeding the AML identified within the draft EA. The Commission is concerned that without immediate action to initiate removals, resource damage can occur unchecked. Likewise, without a clear and consistent response protocol with clear triggers and thresholds, initiations of removal could be delayed for unreasonable timeframes.

In addition, based on the information provided in the draft EA and supporting documents, including the conclusion that [ldquo]there is no basis to establish the connection between the original protected band and the current horse population[rdquo], the population estimates of zero from the years 1994 and 1995 as reported to Congress, and the documented influx of horses into the area of the HWHT following the 2002 Rodeo-Chediski Fire, the Commission does not agree that it is appropriate for the A-S to [ldquo]nonetheless decide to manage horses inhabiting the territory or nearby areas as wild under the Act[rdquo]. By adhering to Forest Service regulations, the A-S can avoid a negative precedent in which unauthorized and feral livestock that wander into the territory in the future are [ldquo]assumed[rdquo] to have protected status.

The Commission encourages the Forest to utilize all opportunities and tools within its purview under Federal law or rule, to identify clear thresholds, monitoring, and response protocols to maintain the wild horse population within the established AML in the EA, and to maintain the ecological balance for all resources, including wildlife, on the Forest.

The Commission appreciates your attention to these matters and looks forward to our continuing coordination with the Forest on this and other Forest Planning. If you have questions regarding this letter, please contact Clay Crowder, Assistant Director, Wildlife Management Division, at 623-236-7666.