Data Submitted (UTC 11): 3/12/2020 4:29:02 PM
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Comments:
Dear Forest Supervisor,

The following alternatives must be analyzed and designated as proposed actions in the Environmental Assessment (EA) on the Heber Wild Horse Territory Plan.

1. Establish a genetically sustainable population limit of at least 200 horses.

The proposed AML of just 50-104 wild horses is not based on science, is too small to be genetically viable and could result in the permanent removal of 300 or more wild horses from the Territory. The AmL is based on the inequitable allocation of public forage resources to privately owned livestock. The EA must analyze and designate an alternative to expand the AML to a minimum of 200 horses and provide a scientific rationale for the number, including full disclosure of the resource allocation between livestock and wild horses on which the AML is based.

2. Use humane fertility control to stabilize the Heber wild horse population and reduce it humanely over time.

The National Academy of Sciences (2013) recommended the use of humane PZP fertility control for population management of wild horse herds. The use of the PZP vaccine can bring about zero population growth within 2 years and can reduce population numbers over time. The EA must include an alternative for an aggressive PZP fertility control program in the Territory and must allow for 5-10 years to achieve an AML of 200 horses.

3. Reject use of surgical sterilization as a management tool.

The National Academy of Sciences (2013) advised that inhumane surgeries to remove the ovaries of mares are "inadvisable for field application" in wild horses due to risk bleeding and infection. The BLM must drop this alternative from consideration. In addition, the BLM has no proven studies or data to show that the use of castration as a management tool helps to actually stabilize wild horse populations. The NAS also advised that castration of stalllions will cause loss of testosterone and consequent reduction in or complete loss of male-type behaviors necessary for maintenance of social organization, band integrity , and expression of natural behavior repertoire." As a result, the USFS should drop surgical sterilization from consideration as an alternative for consideration as a population management tool.

4. Boundaries of the Territory should be redrawn to accurately reflect the horses' habitat.

The current boundaries of the Territory do not accurately reflect the habitat area for these federally-protected horses, resulting in many horses being designated as "outside the Territory." This is the result of an administrative error in the drawing of the Territory boundary, and can be corrected through an administrative process concurrent with development of a new territory plan.

5. Protocols must be put in place for housing, care, placement and tracking of all horses removed from the Territory.

The USFS must fully disclose and analyze its plans for any horses removed from the Territory, including where they will be housed, how they will be cared for, and what the Forest Service plans for their long-term placement and care. By law, the USFS may not destroy healthy horses or sell them for slaughter. The USFS must create a

system for placing and tracking all horses removed from the Territory. This should include, but not be limited to, the implementation of a year-long adoption process, similar to that of the BLM, by which the adopter does not gain title to the horse until one year of ownership and care. The USFS must also develop a database for tracking the disposition of each horse as well as a system for checking potential adopters or purchasers for their history regarding horse adoptions, sales and past animal abuse. Processes like these will help ensure that the USFS is complying with Congress' directive to protect federally-protected wild horses and burros from slaughter.

Our public lands and the wild horses that live on them belong to all Americans, and they must be managed in the interest of all Americans. Wild horse management must be humane, cost-effective, and based on science. The proposed management action for the Heber Wild Horse Territory must be drafted in accordance with these criteria.

Thank you for your consideration.