Data Submitted (UTC 11): 3/16/2020 5:53:37 AM First name: Janis Last name: Moss Organization:

Title:

Comments: We moved to this area after living on the west coast where I acre could easily support a horse year around, later living on a farm in Minnesota where with care a horse could be supported with only a few more acres. Here, our 25 acres would not even support 1 horse without supplemental feeding 365 days of the year. This high desert country is very fragile and pristine and needs careful care and stewardship.

As I read the proposal, I see 2 main problems. According to your records, there were originally 7 horses on the management area. In 2014 there were 15 in the area and 154 in the surrounding area, presumably from the Ft Apache Indian Reservation. This increased in 2017 to 27 in, and 272 surrounding, which is just under the BLM' average growth of 20% per year. So, your first problem is controlling the horses coming into the area from Ft Apache. The second problem is Birth control to keep your numbers to acceptable levels.

As a horse lover, I don't see removal to long term holding facilities as a humane option, nor is sending animals to slaughter. So, I believe birth control to be your best option. The only true, permanent method is gelding (males) and ovariectomy (mares). The procedure in mares is minimally invasive involving a vaginal laparotomy and tying off the ovaries, done with local anesthesia. It does not involve repeated catching and injecting of drugs and will help permanently to control populations. A good vet can complete the procedure in minutes. You may need to also treat the horses from Ft Apache, but permanent birth control will be necessary to humanely control overpopulation and if your numbers go to low, you can import from holding facilities. However, I think your starting #of 50 is high. your number should reflect what the worst year would support, and keep the horses healthy, to allow for fires, drought or harsh winters. Not forgetting elk, deer and grazing allotments. Thank you for your consideration