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Title:

Comments: Re: Review and Comment

Question #1

Is this document a "plan", a "project", a policy change, a revision, or an "update"?

Question #2

Why were the AML units for carrying capacity (50-65) ever dismissed or abandoned? Since 2011 no animals have been removed and numbers were allowed to exceed 135? More than twice the acceptable number?

Question #3

The management details in Alternative 2, include intense participation from medical professionals (vets) and multiple agencies that can turn so costly, \$\$\$\$ not to mention coordinated management challenges. Is the American taxpayer (me included) able, willing, or in agreement with this added cost burden? Is the funding even feasible? Hiring contractors and genetic scientists? So much of these activities rely on volunteers and are weather dependent- round-ups are not without "hoops" to jump through. Just saying.....

Comment #4

"Limited winter forage" as a factor in determining carrying capacity?

As defined: Carrying Capacity

"Refers to the number of people, and/or living organisms/crops, that a region can support without environmental degradation."

"The carrying capacity of a biological species in an environment is the maximum population size of a species that the environment can sustain indefinitely, given the food, habitat, water, and other necessities available in that environment."

Seasonal fluctuation in the weather is a factor in the overall composition and availability of forage. Therefore the AML (50-65) already addresses the possible deep snowfall and limited Winter Range. I would argue that more importantly, the factor to consider in the equation for determining AML should be "MEGA DROUGHT", limited precipitation. Global Climate Change is for real. Inadequate rainfall limits forage production.

Comment #5

Limited Genetic Diversity

The gene pool of all the US Federally owned wild horse herds is at your disposal! Horse trading among the other bands of US BLM stock is reasonable. Periodically a stallion, a mare in foal, and a two year old "stud" could be introduced from the Murders Creek (Malheur NF) herd or from any of the Burns Coral wild Horse specimens. Horses are being transported to facilities at various times but incorporating new "blood lines" should not be too scientific. WILD HORSES are by the very nature of being WILD, of no specific progeny. Let natural selection occur in this population. Interfering with reproduction and heritability traits, beyond culling, should be off limits. Introducing drugs/hormones/foreign substances into this horse population is also detrimental and should be reconsidered.

Thank you for this opportunity to comment.

Of the 3 Alternatives presented in this "up-dated" Management Plan, the most reasonable and logical alternative would seem to be Alternative #1. Keep the original AML in place. Simply put, implement the current and standing plan as soon as possible.

The impacts caused by the deviation from the original plan cannot be measured as the maximum number of animals has been exceed for nine years and counting.

The original AML (50-65) determination was based on the same geography (same acreage)as the current Horse Range/Territories. 1975-202 changes exist (a given). The forage production has varied by location over time due to fences, cattle grazing, traffic patterns, logging, and fire management practices, but....

that said it is totally unacceptable that the excess horse units have not been removed. The resource, the land cannot sustain this inflated population.

This is a complex issue indeed and many variables must be considered while realistically looking at disposal methods for these animals. There is COST to consider and feasibility of the continued holding of stock. The American people perhaps do not grasp the severity of consequences facing land managers. Population control of a "WILD (feral) species is really resource dependent and without adequate disposal practices when populations swell beyond capacity, the issue remains unresolved.

Thank you for your attention.