

Data Submitted (UTC 11): 3/25/2021 2:13:36 PM

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Comments: I am having a difficult time determining exactly how many horses you are planning to remove. I thought I read an assessment number within Heber Wild Horse Area about ~100+ animals and wish to remove 50. So the horses are already underrepresented for genetic diversity. I then read on page 14 that in 2017 there were 27 horses counted within the area in question and theories on why the area was underutilized ('Horse use monitoring is needed to determine the reasons for the lack of use.'). So what exactly is the issue? Other than all the fences (shocking) that crisscross the Wild horse area and the fact that many of the fences are in disrepair or damaged. That horses have come in from surrounding reservations...which makes sense with Open Range observed on many reservations.

You have also had horses culled now for the past 3 years by an unknown series of shooters. So again, I am not understanding removal of horses in an area underutilized by wild horses?

Additionally, in reviewing your ethnological history of the area: 'Of those interviewees who had extensive knowledge of that herd stated those horses originally came from retired Army remount horses no longer needed after World War I.' Please keep in mind, many of the horses used in WW1 WERE WILD HORSES that already existed in this territory. AND NO HORSES were returned from Europe, they were determined to be extraneous equipment. Those animals were left behind for work and food for starving Europeans.

I currently am not seeing a reason to hold a removal in the Heber Wild Horse area. And disruption of the current herds will cause a void and influx of horses from outside the area where there will be an explosion of horses caused by random removals, breaking up of herds, breeding of mares incorporated into new herds and an influx of stallions seeking to expand their territory and accumulate new mares.

You would do better to continue working with your local advocates and PZP local mares to keep the population low and sustainable.

Sincerely,

Puller Lanigan