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Comments: The plan provides for fertility control to be used to control the population growth rate of the horses in the Territory. The Forest Service must consider how:

(1) the use of these options will impact the health of the herd when the population is maintained at such a small population.

(2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.

(3) IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

The last population survey in the Territory found that many of the horses were outside of the Territory boundary. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.