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Comments: I urge the Forest Service to abandon plans to further cull the Heber wild horse herd and to use only humane methods to slow population growth.

The Forest Service plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. That's one horse for every 394 acres! A range of 50-104 is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

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.

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:

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

(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.

If removals must occur within the Territory, they should be done exclusively through bait-trapping and done over time, to meet adoption demand and ensure that the Forest Service does not add to the thousands of wild horses already in off-range holding facilities across the country.

Finally, the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service must work harder to protect these federally protected wild horses from harm and to find the person(s) responsible.

Thank you for your consideration.