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Comments: The plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. This is way too low a figure and will result in a genetically corrupt herd requiring the introduction of members of another herd in order to maintain genetic viability.

Also, since this is shared grazing it is important that the wild horses are given appropriate grazing use and the current proposed plan does not do that. And those horses outside the Territory need to be brought back into the Territory before any accurate assessment can be made.

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.

If removals must occur within the Territory, they should be done exclusively through bait-trapping and 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. All the horses in holding facilities is at an extreme taxpayer cost and unnecessary.

It is my understanding that the Heber wild horses have been the target of illegal hunting since 2018. These are federally protected wild horses and I believe it is the Forest Service's responsibility to see to their protection. A concerted effort needs to be made to insure their safety.

This concludes my comments on the subject and I hope that they will be considered with the seriousness that they deserve. Thank you.