

Data Submitted (UTC 11): 4/6/2021 1:04:53 AM

First name: Bonnie

Last name: Johnson

Organization:

Title:

Comments: Please accept these comments as my own, though they were originally developed by the American Wild Horse Campaign; I concur with these points including the changes I have made. My concerns and comments are as follows:

\*The plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. Even at the high AML, that's only one horse for every 394 acres! This range is too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

\*With the proposed AML, at low AML, wild horses are provided just 600 Animal Unit Months while cattle are permitted 5,730 Animal Unit Months to graze within the Territory. To rectify this imbalance, the Forest Service must adjust livestock use in the Territory to give wild horses their fair share of the resources.

\*The last population survey in the Territory found that many of the horses were actually outside the Territory boundary. Instead of removal, the Forest Service should 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 the following in this regard:

(1) PZP has over 30 years of proven efficacy and should be the preferred contraceptive used in the Territory.

(2) The use of the proposed options will impact the health of the herd when the population is maintained at such a small population.

(3) IUDs have not been proven humane or effective in wild, free-roaming herds and should therefore 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.

\*Finally, the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service must protect these federally-protected wild horses from further harm.