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Comments:

How are Heber wild horses in the Sitgreaves National Forest expected to have any semblance of a natural life when they are being reduced to a maximum of just one horse per 392 acres? The AML has been set shockingly and unrealistically low.

This is despite the continued persecution of these small herds. 28 horses have been shot to death since 2018. To date no one has been prosecuted for these crimes. This planned reduction will only encourage such disgraceful behaviour.

The likelihood of these 50-104 individual horses having enough free movement within the 19,700 acres, and being able to find and interact naturally with one another will be significantly reduced, due to the encroachment of the livestock industry and subsequent fencing on public land.

Even if they do breed, they will be incredibly limited genetically; further reducing their ability to withstand environmental changes.

Wild horses have been allocated just under a tenth (5730:600) of the Animal Unit Months permitted to destructive livestock within the Territory. This must be rectified immediately to give wild horses fair access to the resources they need to sustain themselves.

Surveys have shown that many horses reside outside the boundaries of the Territory. By bringing them into the Territory rather than removing them, the Forest Service could instead ensure that they benefit from fertility control, allowing them to live as naturally as possible in their existing herds, but not expand. Natural die-off will reduce numbers but still allow the herd to remain a healthy size.

The use of PZP; which has a successful 30-year track record; has much more public support than horse removal or the use of intrusive, less reliable and potentially lethal IUDs.

PZP does not destroy existing herd relations or cause long-term trauma as it is distributed from a distance via a dart gun. It is also incredibly cost-effective. The long-term cost of confinement is \$1,600 a horse, whereas PZP costs just \$30 per horse, per annum.

Removals should be a last resort and should only happen gradually at a pace that can meet adoption demands. They should be captured using less stressful bait-trapping rather than brutal round-ups.

Wild horses must be protected at all costs. The aforementioned shootings must also be investigated to the fullest extent.