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Comments: The proposed actions for the Heber Wild Horse Territory Plan are not appropriate and here's why: Brutally killing these horses is bad enough, but to think that murdering all but 50-104 wild horses is enough to sustain a genetically viable population in the Territory is ludicrous.

With the new 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. Thus, the Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource.

As far as fertility control, 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.

Bait-trapping, done over time should be utilized 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.

Lastly, these poor horses have been the target of illegal hunting since 2018 and should be protected instead of brutalized further. The perpetrators of these crimes should be brought to justice.