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Title:

Comments: The Heber Wild Horse Territory Plan sets the Appropriate Management Level (AML)is extremely low at 50-104 wild horses on 19,700 acres. Even at a high AML, that is one horse for every 394 acres. This range is far too low to maintain a self-sustaining genetically viable population of wild horses in the Territory. 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. The Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource. The last population survey in the Territory found that many of the horses were outside of the Territory boundary. The Forest Service must make every effort to relocate these horses within the boundary. The Heber Wild Horse Territory 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) Porcine Zona Pellucida (PZP) has over 30+ years of proven efficacy. PZP must be the preferred tool for use in the Territory. (3) Intrauterine Device (IUDs) have not proven humane or effective in wild free-roaming herds. Must be eliminated from further analysis. If removals must occur within the Territory, they must be done exclusively through bait-trapping and to meet adoption demand. Ensure the Forest Service does not add to the thousands of wild horses already in off-range holding facilities across the country. Last of all, 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 perpetrator(s) responsible.