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Title:

Comments: The wild horses of the Wyoming Checkerboard are important ecotourism resources, yet the BLM has entirely ignored the impact of their removal on the local tourism economy and on recreational users of these public lands who enjoy wild horse viewing and photography.

The BLM's plan would decimate the wild horse population in the area of the Pilot Butte Wild Horse Scenic Loop outside Rock Springs. This scenic loop is heavily promoted by Sweetwater County as a tourism destination that provides a glimpse of the "pure and untamed West" and evidence that "the American spirit still thrives.' The plan calls for the removal of the Wyoming wild horse to low AML, leaving a mere 1,550 mustangs on over 3.4 million acres of habitat. This would leave only one horse for every 1,600 acres! The AML should be reevaluated to maintain a self-sustaining, genetically viable population of wild horses across the Wyoming Checkerboard.

The BLM's propose alternative calls for the indiscriminate use of non-permanent fertility control, including IUDs, after the majority of wild horses are rounded up and removed. The BLM should prioritize humane, non-permanent fertility control, like PZP, over mass roundups, pursuant to the recommendations of the National Academy of Sciences.

The BLM is also considering an alternative (IV) in the Environmental Assessment to surgically sterilize 100 mares, castrate 100 stallions, treat the remaining released mares with immunocontraception and unnaturally skew the sex ratio of the wild horse population to 60% stallions and 40% mares. The final EA should reject Alternative IV, the surgical sterilization option, and instead prioritize humane and fiscally responsible on-range management.

PZP has over 30 years of proven efficacy and should be the preferred tool for humane population management in the Checkerboard.

IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

The BLM plan calls for removal of wild horses who have traveled outside of HMA boundaries. Instead of immediate removal, the BLM should make every effort to relocate those horses within the boundary. Wild horse preservation should be prioritized, in line with the wishes of 80% of Americans who want to keep wild horses wild, over the private interests of the livestock industry, particularly the RSGA.