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Comments: 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 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.