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First name: Robin

Last name: Poritzky

Organization:

Title:

Comments: COMMENTS - THE HEBER WILD HORSE TERRITORY PLAN

\*The Territory is almost 20,000 acres. The plan sets an extremely low AML of only 50-104 wild horses on this vast acreage. That is one horse for every 394 acres, even at a high AML! That ratio is far too low to maintain a self-sustaining, genetically viable population of wild horses in this Territory.

\*The Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resources. 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 last population survey in the Territory found that many of the horses were outside of the Territory boundary. The Forest Service should make every effort to relocate those horses within the boundary, instead of immediate removal.

\*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:

o(1) the use of these options will impact the health of the herd when the population is maintained at such a small population.

o(2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.

o(3) IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

\*As the population of wild horses being housed in crowded, expensive off range longtime holding facilities throughout the USA is exploding, removals should be done so, only if necessary. If horses are needed to be removed, it should be done exclusively through bait trapping, over time and factoring in the demands for adoption. To emphasize, The Forest Service should not add more horses to the already exploding off range holding facilities.

\*Finally, 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 person(s) responsible.

Thank you for considering the important comments above.