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Comments: The latest plan proposed for the Heber wild horse herd sets the ALM extremely low, at just 50 to a 104 wild horses on just below 20,000 acres. Even at a high ALM that's 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 ALM, at low a ALM, wild horses are provided just 600 animal unit months while cattle are permitted 5,730 animal unit months to graze within the territory. Given those parameters, 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 conducted in the Territory found that many of the wild horses were outside of the Territory boundaries. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.

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 the following:

1. How 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 been in use for over 30 years and demonstrated proven efficacy and should be the preferred tool for use in the Territory.
3. IUDs have not been proven to be humane or effective in wild, free roaming herds and should be eliminated from further analysis.

If removals of any of the Heber horses must occur within the Territory, they should be done exclusively through bait trapping and over time, to meet adoption demand and ensure that the Forest Service does not add to the thousands of wild horses off-range holding facilities across the country.

The last area of serious concern for the Heber wild horses is the fact that they have been the target of illegal hunting since 2018. The Forest Service must work harder to ensure the safety of these federally protected wild horses from harm and find those who are responsible for these atrocities.