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Title:

Comments: Date: April 22, 2021

Subject: Heber Wild Horse Territory Plan #18916

Dear U. S. Forest Service:

The Wild Free-Roaming Horses and Burros Act of 1971 requires the Bureau of Land Management (BLM) to "determine appropriate management levels for wild free-roaming horses and burros on [designated] public lands." This legislation made the BLM responsible for deciding how these appropriate management levels (AMLs) of wild horses and burros should be achieved within the agency's multiple-use mandate, including consideration for wildlife, livestock, wilderness, and recreation. The idea was to determine an optimum number of horses that maintained a thriving natural ecological balance without a deterioration in range conditions. However, that never happened.

Previous reviews of BLM's setting of AMLs, including the U.S. District Court for the District of Nevada, the Interior Board of Land Appeals, and the Government Accountability Office, consistently reported that established AMLs were not based on thorough assessments of range conditions. These agencies further noted that AMLs of many HMAs in the 1970s and some in the 1980s were only based on administrative decisions rather than information about the carrying capacity of the range. Currently, the BLM sets a national population limit of just 16,000 to 27,000 mustangs and burros on 27 million acres of public lands. This represents the number of mustangs on public lands in 1971 when Congress unanimously passed the Act because they were considered "fast disappearing."

In my view, the Heber Horse Management Plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. Even at high AML, that's one horse for every 394 acres. This range of numbers 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. I believe that 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. 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 also 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.

If removals 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 already in off-range holding facilities across the country.

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. The Wild Free-Roaming Horses and Burros Act provides specific protections to "all unbranded and unclaimed horses and burros on public lands of the United States," and makes it a crime for anyone to harass or kill these animals on federal land. It requires the departments of the Interior and Agriculture to protect the animals. It is; therefore, up to the Forest Service to protect our wildlife resources, and that includes our wild horses and burros.

I want to thank you for the opportunity to comment on this proposal.

Sincerely,

L. Bennett, wild horse/burro and public lands supporter

