

Data Submitted (UTC 11): 4/23/2021 1:26:55 AM

First name: Clarinda

Last name: Karpov

Organization:

Title:

Comments: To the U.S. Forest Service:

I am commenting in opposition to the Heber Wild Horse Territory Plan.

This plan sets the AML extremely low at just 50-104 wild horses on 19,700 acres. Even at the high AML, that's only 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 AML, at the low AML, wild horses are provided only 600 Animal Unit Months whereas cattle are permitted 5,730 Animal Unit Months to graze within the Territory. It is imperative that the Forest Service adjust livestock use in the Territory in order to give wild horses their-and our--fair share of the resource, because the public's use and benefit must take precedence over private, commercial interests on our public land. And the clear public benefit in this case is to humanely manage our federally-protected, iconic, heritage wild horse herds on our public lands, for the enjoyment and inspiration of all Americans. 80% of Americans across the political spectrum support humanely managing and maintaining America's wild horses and burros on our public lands.

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, and reunite them with their herd.

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 humane birth control has over 30 years of proven efficacy and should be the preferred tool for use in the Territory. It is recommended by the National Academy of Sciences as the preferred birth control for wild horse herds, and it has proven effective in every wild herd across the country where it has been implemented. It is easy to give, humane, inexpensive, reversible, and maintains the horses' wild herd social behaviors.

(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 warehoused in off-range holding facilities across the country.

Finally, the Heber wild horses have been the target of illegal hunting, brutal shootings that have left 28 of the wild horses dead since 2018. The Forest Service has a responsibility to protect from harm these federally protected wild horses and must work harder to fulfill that responsibility, and also to find those guilty of illegally hunting the wild horses.

Sincerely,  
Clarinda Karpov

