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Comments: The 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 294 acres. This range is far too low to maintain a self PZP sustaining genetically viable population of wild horses in the Territory. Increase the AML to a minimum of 150 to 200 horses (the minimum) needed for genetic viability as recommended by the BLM Wild Horse and Burro Handbook (Cothran, 2009). With the new 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 Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource. The Forest Service permits nearly 500 cow/calf to graze within the horses habitat.

The last population survey in the territory found that many of the horses were outside the territory boundary. Instead of removal, the Forest Service should make every effort to relocate the horses in the Territory.

The Forest Service should use humane PZP fertility control. PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory. IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

If removals occur within the Territory, they should be done exclusively through bait trapping and over time, to meet adopter demands 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.