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Organization:

Title:

Comments: Background:

The 1971 Law: The wild free roaming horses and burros act stated:

- The DOI secretary was to MANAGE the wild horses and butos
  
- Where found
  
- Where, within that area, the wild horses were to be managed "principally" but not exclusively
  
- With the purpose of having a THRIVING, NATURAL, AND ECOLOGICAL BALANCE.

#### HEBER WILD HORSE TERRITORY MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT PLAN

#### NUMBERS:

Proposed is to have 50-104 wild horses on 19,707 acres. The BLM Handbook and the BLM's former geneticist, Dr. Gus Cothran, from 1990 to recently, states, in order to have a sustainable herds with long term genetic diversity, variability, and viability, a "minimum" of 150-200 with 50 effective breeding animals is needed. Your proposed number of 50-104 falls far short of the 150-200. Proposed is 150-300 wild horses. You say horses can be brought in from other herds if genetics are compromised but the law says the horses are to be "where found." 50-104 is not a "THRIVING, natural ecological balance."

#### RESOURCES:

You say the land is only able to sustain 50-104 wild horses. Allocated are 600 AUMS for wild horses as opposed to 5730 AUMs for livestock. Resource adjustments need to be made to support thriving wild horses. In addition to resource adjustments, relocation efforts need to be made to insure space (fence realignment), water supply, and forage is fairly accessible to the wild horses. As it is now the Heber are does not have a "thriving, natural, ecological BALANCE).

#### BOUNDARIES:

Stated is many of the Heber horses outside the Territory boundaries. If it is because the boundaries originally were not drawn up to take into account the location of the resources used by the hroses, then a reconsideration of the boundaries is needed. If the horses are outside the boundaries because the livestock are usurping more than their fair share of resources or if the ranchers are excluding the horses from resources within the boundaries, then those problems need to be dealt with.

#### POPULATION CONTROLS:

With an AML of 50-104 contraceptives need to be off the table as with foal and adult deaths, reproductive replacement is needed. IUD research to date suggests a number of untoward conditions may occur in the use of the IUD which, because the horses are in the wild, the condition likely won't be diagnosed and may cause pain or death. These conditions are infections and perforations of the uterus, endometrius, uterine edema, pyometra, and/or abortion if a zycote or fetus is present. Because of the current research IUD use should be taken off the

table.

#### CONCLUSION:

As an American it is disappointing to me that the FS would come up with such a plan that to me seeks to slowly but surely destroy the Heber wild horses. The FS managed 193 M acres but only 2.3 acres for wild horses and burros. None of the Territories except for Devils Garden has genetically viable numbers in its remaining herds. The FS claims to have some 10,000 wild horse and burros but when I have repeatedly inquired re: numbers from herd area to herd area, I can't get answers. A mere 34 of your Territories claim to be active though doubtful and 19 are inactive. Horses evolved in the Americas. In a blip of evolutionary time they left during the Ice Age and were returned. They settled the West but now are being killed, marginalized, and degraded and devalued just like we have been doing to our Native Americans and Blacks. I am ashamed of you. And I resent having to pay my tax dollars to you. And while I as one person can't stop you, I have faith the man upstairs will deal with you in his own time.

I am asking you to come up with a Territory plan in which sustainable numbers of horses are allowed in, which boundaries are reexamined and readjusted, in which resources are reallocated, developed and maintained for the wild horses and wherein our wild horses are preserved and cherished as part of our American history and culture