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Comments: The preferred action allows for the use of helicopters to remove "excess" wild horses and burros. I urge you to consider a slower approach of scaling up fertility control as lesser removals are accomplished methodically with bait-and water-trapping techniques.

The preferred action includes the possible use of fertility control to help manage wild horse and burro numbers. I strongly support the use of safe, proven and humane fertility control vaccines to halt roundups. Of the available vaccines, I prefer the use of PZP, which has a long history of research and use and because the public tends to support its use because of the long-term data behind it.

-The preferred action includes the possible use of sterilization surgeries for both stallions / jacks and mares / jennies. RTF strongly opposes the costly, unproven and dangerous surgical sterilization of wild mares and burro jennies. RTF does not advise gelding as a population management tool since there are effective and well-studied, safe and humane and reversible population growth suppression alternatives and there are not sufficient studies to understand the behavioral effects of gelding some proportion of a population. Modeling for population effects of a certain percentage of male horses in a population being geldings is a guess, at best.

-The preferred action includes as an option sex-ratio skewing so that males make up a greater percentage of the herd. RTF does not advise sex-ratio skewing for wild horses for these reasons: (1) management of populations via sex skewing is temporary (populations return to their normal ratios), and (2) healthy populations rely on whatever the norms are in terms of that population's demographics - adjusting a population of wild horses to skew for more or less of anything does not attain a natural state for that population, with behavior ramifications that are not yet understood (potential heightened aggression in stallions, for example).

Thank you.

Janice Flatto