

Data Submitted (UTC 11): 10/26/2021 2:27:13 PM

First name: Marcus

Last name: Straub

Organization: Life Is Great! Inc.

Title:

Comments:

I support the proposal to amend the wild horse Appropriate Management Level (AML) within the Complex.

However, the current and proposed ranges are both far too low to maintain a self-sustaining, genetically viable population of wild horses or wild burros. More than one equine per every 4,000 acres is possible within the Complex.

As part of this proposal, the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) must further increase the AMLs for both wild horses and wild burros in order to provide these federally protected animals with a true fair share of the resource.

I strongly oppose the USFS and BLM's plan to proceed with the Proposed Action that would:

Roundup and unnecessarily remove hundreds of federally-protected wild horses and burros in order to achieve the unscientific low AMLs;

Utilize helicopter drive trapping for the removal; and

Potentially implement GonaCon and/or untested, inhumane surgical sterilization procedures on wild mares and stallions instead of exclusively PZP fertility control in a manner which would humanely stabilize the populations in accordance with the recommendations of the National Academy of Sciences (NAS) with a Catch-Treat-Release system.

The National Research Council concluded that "spaying" of mares through the invasive ovariectomy via colpotomy procedure is "inadvisable for field application" due to risk of bleeding and infection.

Further, gelding could result in the loss of male-type behaviors necessary for maintaining social organization and expression of the natural behaviors that the public is interested in protecting.

All surgical sterilization options should be eliminated from consideration in the final EA.

After the agencies further increase the AMLs in order to secure genetic health of the herd, if the agencies still choose to proceed with fertility control then PZP must be implemented in the Complex in a way that will ensure enough mares are vaccinated in order to reduce population growth rates and humanely reduce population numbers, if necessary, over time. PZP has over 30 years of proven efficacy and should be the preferred tool for humane population management for the foreseeable future.

Additionally, I want to stress that if removals occur, they should be incremental, in smaller numbers over time, and in an effort to implement a catch-treat-release program to allow for a stable population and minimize the burden to taxpayers of warehousing horses in holding facilities.

Further, burros react differently than horses to helicopter removals, causing higher risk of injury and harm to the animals. Burros must only be removed with bait trapping if removals are chosen in this plan.

Research shows the beneficial role wild burros play in promoting biodiversity in their environment, and how the removal of burros has been associated with species extinction in the ecosystem. The agencies failed to adequately consider this information and new research here and failed to consider the impacts such a wild burro removal will have on the environment. Before the agencies move forward with its plan for the burros in this Complex, it must adequately analyze and apply this new scientific research. Chances are that once the agency does, the agencies will find ample reason for the Plan to significantly change.