

Data Submitted (UTC 11): 10/26/2021 5:05:19 PM

First name: Sally

Last name: Brecht

Organization:

Title:

Comments: I support the amendment of the wild horse Appropriate Management Level (AML) within the Complex.

\*The current and proposed ranges are far too low for a self-sustaining, genetically viable population of wild horses and burros. More than one equine per every 4,000 acres is possible within the Complex.

\*The US Forest Service (USFS) and Bureau of Land Management (BLM) must increase the AMLs for wild horses and burros to provide these federally protected animals with a true fair share of the resource.

I oppose the USFS and BLM plans to proceed with the proposed actions:

\*Roundups to remove hundreds of federally protected wild horses and burros to achieve unscientifically low AMLs.

\*Using helicopter to drive horses and burros into traps.

\*Implement GonaCon and/or untested, inhumane surgical sterilization procedures on wild mares and stallions.

PZP fertility control should be used to humanely stabilize the populations in accordance with the recommendations of the National Academy of Sciences (NAS) within a Catch-Treat-Release system.

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

\*Gelding results in the loss of stallion behaviors necessary to maintain social organization and the natural behaviors that taxpayers want protected.

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

\*If removals occur, they must be incremental, done in small numbers over time. Implementation of a catch-treat-release program to allow for a stable population and to minimize the burden on taxpayers of warehousing horses in holding facilities is needed.

\*After the agencies increase the AMLs to ensure genetic health of the herds, PZP must be implemented in the Complex to ensure that enough mares are vaccinated to reduce population growth rates and humanely reduce population numbers over time. PZP has 30 years of proven efficacy. It is the preferred tool for human population management

Burros react differently than horses to helicopter removals, creating higher risk of injury and harm to animals.

\*Burros must only be removed bait trapping if removals are chosen in this plan.

\*Research shows the beneficial role wild burros play in promoting biodiversity in their environment. Removal of burros has been associated with species extinction in the ecosystem. The agencies did not adequately consider this information and new research. Before the agencies move forward with their plans for burros in this Complex, it must adequately analyze and apply this new scientific research. Once the agencies do, they will find ample reason for significant changes to the plan.