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Comments: 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.