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Organization:

Title:

Comments: Dear Committee;

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

#### WILD HORSES

- \*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.

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.

#### WILD BURROS

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.

#### LISTEN TO SCIENCE - NOT THE HEAVILY-INVESTED LIVESTOCK INDUSTRY

Research shows the beneficial role wild horses and burros play in promoting biodiversity in their environment, and how the removal of them have 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 horse and burro removal will have on the environment.

Before the agencies move forward with its plan for both the wild horses and 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.

Thank you,

Carolyn Borkowski