

Data Submitted (UTC 11): 10/29/2021 8:29:37 PM

First name: Laura

Last name: Leigh

Organization:

Title:

Comments: I submit these comments for myself and as representative of Wild Horse Education, our board and members.

The 2013 scoping is no longer adequate. Nearly a decade has passed and the physical environment and public concerns have changed. Scoping must begin again and the adequate and timely creation of a PEA should follow. The PEA does not adequately address resource preservation for use by wild horse/burro is not considered. The public was not given opportunity to address subjects like climate change that are a priority for the current administration and extremely relevant to these WHT/HMAs. Water improvements and restricting recreational growth, and other uses that infringe on forage and water needed for the herds in the area, are critical to appropriate management, and protection of the, of public resources (wild horses/burros).

The AML is too low for the acreage and priority is not given public resource (wild horses/burro) and instead industrial/recreational uses are given far more inside the boundaries of the territory. Industrial/recreational uses can populate areas outside the boundaries of the WHT/HMAs, wild horses/burros cannot.

Surgical sterilization is not appropriate. Spaying of mares has also been deemed "not in line with current policy." See Confusion HMA Utah litigation.

New research has been done since the antiquated scoping period on burros and their environment. Burros as a beneficial use are not analyzed in this PEA, partly due to the inadequate application of "timeliness" outlined in the NEPA process between scoping and a PEA.

All large scale removals should be omitted from planning as they increase reproductive rates and impede any progress that implementation of fertility control provides. At not time should more than 10% of the herd be captured.

Please begin scoping and creation of a timely PEA.

This PEA is based on woefully antiquated data and public input.