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Comments: The United States Forest Service is soliciting comments for the Devil's Garden Plateau Wild Horse Territory (DGPWHT) Draft Environmental Assessment (EA). The AML for the Devil's Garden WHT is 206-402 horses. The current estimated population is 1339 horses. The area is described as being environmentally stressed due to grazing and drought. Alternative 1, the Proposed Action, joins the East and West sections of the DGPWHT with the middle section, and expands the use of fertility control.

Comments to Evaluation of Current Appropriate Management Level

* "...the Proposed Action alternative is for no 2024 Draft Environmental Assessment, Devil's Garden Plateau Wild Horse Draft Territory Management Plan Page 11 of 91 change to the current territory AML. The AML would remain at 206 to 402…" (EA, pps. 10-11).

If fertility control is some portion of a modern management plan, AML can be brought into context: a decreased population growth rate translates to both longer times between gathers and fewer horses needing to be gathered if the population growth rate is reduced. Because of this, the agency can: (1) set low AML higher and (2) potentially not need to gather to a low AML before application of fertility control. Low AML is necessary to gather to in gather-only management scenarios (so that there is sufficient time until numbers above high AML are reached, triggering a gather). It is reasonable to adjust the expectation that reaching low AML is necessary.

Comments to Population Management

* "Applied contraceptive vaccines prior to reaching AML goals would be allowed across the entire territory…" (EA, p. 12).

We are pleased that this field office will implement fertility control. As seems the intention of this office, we have often recommended immediate implementation of fertility control alongside and as part of any and all gathers while working towards, and not waiting for achievement of, AML. Indeed, the National Wild Horse and Burro Advisory Board recommended as such in the September 2020 meeting: "The Board recommends that the agency expand fertility control implementation and develop measurable objectives outlining a targeted reproductive growth rate reduction and multi-year plans, on an HMA-by-HMA basis. The effort should include fertility control treatments combined with gather operations, including HMAs where AML will not immediately be achieved. The Board recognizes that reproductive growth rates on the range must be reduced immediately so that overall numbers of horses or burros, as well as overall numbers of gathers, begins downward trending."

Return to Freedom, working with several stakeholder organizations, including large animal-welfare groups, governor's associations, public lands councils, cattlemen's associations, and conservation groups, has arrived at similar conclusions via modeling and peer-review research analysis: a slower and multi-faceted approach to wild horse management must include some removals, some on-range fertility control (via remote darting), and/or some gather-administer-release fertility control. These modalities should not be implemented only when AML is achieved, but as a way to begin stabilizing the population immediately and work towards lowering populations, where applicable, more slowly. This is more effective at creating and maintaining sustainable wild horse management (with less dependence on transportation and short-term holding, which is the most expensive portion of wild horse management). To reduce stress on holding facilities, contractor availability, and budget, the application of immuno-contraceptive vaccine alongside gather-removals allows for stabilization and reduction, where necessary, of wild horse numbers, and is more economically and logistically viable: population growth rates on the range are reduced, and time between gathers can be extended. At the time of another gather,

fertility control vaccines can be reapplied to mares that have received initial doses, new mares can receive treatment, and some animals can be gathered and removed, in effect scaling up fertility control at every opportunity.

It is also important to recognize that broad and diverse stakeholder support exists now for immediate and continued scaling-up of fertility control. This will have implications for Congressional support for increased resources and appropriations to WHB programs. At a recent National Wild Horse and Burro Advisory Board meeting (June 2023), this recommendation was made: "Removals coupled with meaningful, impactful fertility control will improve the health and welfare of free-roaming horses and burros as well as rangeland health, and will foster diverse, bipartisan, broad support. This will help reflect the need for robust, long term funding from Congress. Since "fertility control" is the common interest of so many interested publics, the Board recommends that BLM and the USFS develop operational plans outlining how robust, meaningful, programmatic fertility control will be incorporated into HMA and Territory management plans. The Board recognizes that specific HMA/Territory fertility control plans have not been developed, and that each HMA/Territory will require a different approach. This effort can also serve as demonstration sites, which can also validate PopEquus." To state this very clearly: there is support and action in broadly represented stakeholder groups to level up and maintain robust funding for the wild horse and burro programs if fertility control is ever-increasing. That support will be difficult, if not impossible to maintain, if management continues as gather-removal.

Ideally, at least 70% of mares in a population should receive fertility control treatments to stabilize and/or reduce (over the longer-term) the overall population. It is important to develop a plan with gather-treat objectives clearly established, and the resulting impact on the population over time realized, so that meaningful year-to-year adjustments can be made to the program.

* "Once AML goals are reached in a specific unit (grazing allotment or pasture) of the territory as determined by preceding aerial population survey, apply either GonaCon EQ or ZonaStat-H plus PZP-22 combined." (EA, p. 12)

We appreciate a plan which is centered around proven, safe and humane fertility control vaccines, with a focus on non-permanent population control methods. These are the modalities that garner the most public support. Because of the long-term research and use behind PZP and PZP-22, we encourage the use of these well-proven immuno-contraceptive vaccines as often as possible.

Of note, the following information is derived from field data published in peer-reviewed journals for Clan Alpine (2000-2004) and Cedar Mountains (2008-2015) HMAs: an initial dose of PZP-22 reduced pregnancy by 89% in year one and 74% in year two relative to untreated mares. When followed by a booster dose of Zonastat-H (native PZP) two to three years later in those mares, pregnancy inhibition averaged more than 80% across the next three years (Rutberg 2017*). Additionally, PZP and its effects have been studied in free-roaming horse herds for 35-plus years and it enjoys an excellent reputation by broad stakeholders.

*Rutberg, A., Grams, K., Turner, J., Hopkins, H. (2017) Contraceptive efficacy of priming and boosting doses of controlled-release PZP in wild horses. Wildlife Research. http://dx.doi.org/10.1071/WR16123

Conclusion

RTF has, and will continue to, work in partnership with the FS and BLM to study and implement effective, humane, and sustainable approaches to managing wild horses and burros on our public lands. The intent of these comments is to further contribute to that partnership by providing the agency with several recommendations on how best to develop and implement a wild horse management plan for the DGPWHT.

There are local willing partners available to assist the agencies with identification, documentation and application of fertility control and we stand by to facilitate or participate in that process as well.

Thank you again for the opportunity to provide input.