

I support the "**No Action Alternative**" which means no removal of horses and continued use of PZP to manage the population. These are my talking points for arguments against the "Proposed Action Alternative."

1. **Genetic Viability:** The Appropriate Management Level for this herd is 70-140, with the current population size at 178. Dr. Gus Cothren, the leading geneticist on wild horses says that in order to remain genetically viable, there must be 150 breeding aged adults in the herd. Removing 68 or more wild horses will severely impact the ability of the herd to remain genetically viable and the BLM's solution of bringing in horses from other herds to solve this problem is absurd and cruel. They should leave enough horses in the herd to remain genetically viable.
2. **Use of GonaCon:** The BLM goes into depth talking about the use of GonaCon on this herd even though they have a successful birth control program already in place since 2011 using PZP. The excuse is there are mares who do not respond to PZP and foal anyway - there are 3, all over the age of 14. This does not constitute a reason for alarm and change in protocol. The EA outlines three different conflicting plans for the use of GonaCon - one plan is just use it on the non-responding mares, the next is use it on mares over 13 who have foaled, the next is use it on any mares who have contributed genetically to the herd. GonaCon is a sterilant. After 2 doses the mares can become completely sterile. There are also issues with abscesses at the injection site. GonaCon should NEVER be used on wild mares.
3. **Range Degradation:** There is no analysis at all in this document showing range deterioration cause by the wild horses being over AML. There is no data whatsoever on effects of wild horse use and then no data at all about the grazing of cattle on the range and the degradation to the land that this has caused and continues to cause. There needs to be documentation of rangeland health and the impact of wild horses AND livestock before this actually qualifies as a legitimate Environmental Assessment.
4. **Keeping the Older Horses on the Range:** Supposedly none of the wild horses over 20 years old under the Proposed Action will be removed. However, "At the temporary holding facility, a veterinarian, when present, would provide recommendations to the BLM regarding care and treatment of recently captured wild horses. Any animals affected by a chronic or incurable disease, injury, lameness or serious physical defect (such as severe tooth loss or wear, club foot, and other severe congenital abnormalities) would be humanely euthanized using methods acceptable to the American Veterinary Medical Association (AVMA)." So if 30 wild horses have any of these conditions, they will not be left on the range but will be killed. This is not keeping them on the range and allowing them to live out their lives. And I challenge anyone to find an older horse whose teeth are not worn down.
5. **Ageing Population:** There are currently 178 wild horses in the MCCullough Peaks Herd. 59 of them are over 15 years old and 22 of them are over 20 years old. It is possible that over 15 horses will pass away over this coming winter. With so many of the horses at the upper end of their lifespan and with only 2% yearly growth rate, it is likely that the herd, if left alone, will achieve AML naturally in a few years with no need for a roundup and removal.
6. **Time of Year:** The proposed start of the Bait Trapping will be November 2023 - March 2024. This is winter. The BLM is supposed to check the bait trap every 10 hours and

provide food and water to the horses trapped. However, in my experience, because of strong and harsh winter storms the traps may become inaccessible even with plowing for days or weeks at a time. The horses could die if not given food or water. Traps should be emptied and closed with the onset of winter weather for the health and safety of the horses.

7. **Use BLM Staff for Bait Trapping:** An outside contractor should NOT be brought in to conduct the bait trapping. BLM staff and volunteers know the horses best, and it is going to be safer and more humane to do the bait trapping "in house."
8. **A 10 Year Plan Does Not Comply with NEPA:** In this document the BLM proposes to make this a 10 year plan, so that they can continue to remove horses over 10 years without coming back to the public for comments on their plan. This is a violation of the National Environmental Policy Act, which is supposed to determine if their actions have significant environmental effects. The BLM needs to prepare Scoping and an Environmental Assessment each time it takes an action against the horses.
9. **Welfare of the Horses:** This document does not take into account the welfare of the horses. Separating them from their families and their home and placing them in overflowing, understaffed holding facilities full of disease is not to the benefit of these horses. With over 61,000 wild horses currently in holding facilities, the probability that all will be adopted and given good homes is slim. These horses should be left where they belong, on the range.

Submit your comments here by August 12 at 4:30 pm MT:

<https://eplanning.blm.gov/eplanning-ui/project/2022012/570/8003816/comment>