



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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May 14, 2020
Slater Turner, District Ranger
Lookout Mountain Ranger District
Ochoco National Forest
3106 NE 3rd Street
Prineville, OR 97754

Comments – Ochoco Wild Horse Management Plan Project Draft EA

For the record we are the Oregon Hunters Association (OHA), with over 10,000 members in 26 chapters statewide. Many of our members make annual fall trips to the Ochoco Mountains for deer and elk hunting. We are providing input testimony on the alternatives as described within the Ochoco Wild Horse Management plan EA, and to express our preference to “most” of the provisions outlined in Alternative 2 of this document. However, we do recommend stronger language to accommodate the needs of wintering big game animals within Alternative 2.

The Forest Service census data indicates that the Ochoco Wild Horse Territory has more than twice as many horses as the current management plan authorizes and the herd is increasing. The EA's information on big game numbers states that both deer and elk have increased in the past 50 years and that is not accurate with regards to mule deer, which are considerably lower in population than in 1971 – the benchmark date stated for comparison. Additionally, winter range mapping for big game and wild horses shows an overlap of 70% or more. USFS data also indicates that riparian areas have been adversely affected by excessive numbers of wild horse grazing, with a recent estimate at over 130 animals and with the authorized number ranging from 55-65 animals. The plan EA acknowledges that since 2010 there has not been a “gather of the herd” to bring the herd size down to the current authorized number of 55-65 animals. There is obviously a need for change with wild horse numbers, beginning with herd size management.

Simply put, the Wild Free-Roaming Horses and Burros Act (WFRHBA) of 1971 requires that wild horses occupy the land along with the native wildlife and “permitted resource uses” such as livestock grazing. OHA has real concerns with giving critical big game winter forage to wild horses for maintaining the upper part of the 12-57 horse range allowed for in Alternative 2. If the upper figure in this range (57) could be identified as a trigger point for action to reduce horse herd size then our organization would be much more supportive of this preferred alternative (2).

Sincerely,

Jim Akenson
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