

To: National Forest Service, Ochoco NF district

RE: **Ochoco Wild Horse Herd Management Plan #46228**

Date: May 17, 2020

To whom it may concern, and/or Shane Jeffries, Ochoco Forest Supervisor:

First I would like to say thank you for the opportunity to comment and have my particular position considered. As is usually the case with any Plan amendment/change in the NFS this issue is complicated, with many variables and differing viewpoints of 'interested parties' which compound the difficulty of choosing a clear, equitable way forward.

As you know well, the Forest Service (and BLM) is mandated by law to protect and sustain wild horses per the WFRHBA of 1971 (and amendments), and to 'maintain animal levels that achieve a "thriving natural ecological balance".' This directive covers all aspects of their welfare, including nutritional health and genetic viability. Proportionately, their needs are at least the equal of other 'interests'/uses of the forest. But too often, the horses' needs are subjugated to commercial interests such as livestock grazing, etc. Livestock grazing is a *privilege*; **wild horse sustainability is prescribed and guaranteed by law.**

Alternative #2 of the Plan seems to me to be the best action, partly because it's the option endorsed by the NFS. *BUT* I do not agree with it in its entirety, and **would propose to incorporate the following changes** and/or revisions of certain key points (based upon current science and 'educated opinions'):

- A **HERD SIZE** with as few as 12 individuals is *vastly* below the necessary number for a viable population. So ... Instead, my opinion (influenced by science/studies) is that **a herd size of no fewer than 60 and up to 100** (give/take 5% overage) wild horses would much better insure genetic variability as well as sustainability to better withstand varying seasonal conditions and the potential, yet-undetermined stresses of climate change.
A further point on herd size: even though Dr. Gus Cothran (Texas A&M), the leading equine geneticist, determined that the minimal herd size to ensure the needed genetic diversity is between 150-200 horses, I would propose a lesser population (of 60-105) IF this is also supplemented by introduced genetic variation of (especially) young wild mares brought into the herd. My position (of less than 150-200 horses) is based on recognizing the *potential* of range/forage/vegetation degradation with a larger herd.
- NO surgical spaying of mares should be allowed. Studies have shown this method is inhumane: it is frightening, quite painful and the procedure itself is often roughly ('brutally') done, thus risking the welfare and even survival of the mare. Plus there often is no follow-on pain medication, or monitoring done to insure the mare is healing well.
- I would not be opposed, when appropriate, to selective castration (e.g. stallions of lesser-quality traits that would not enhance herd genetics) IF this surgery is done humanely, with sedation and follow up medical evaluation.
- The introduction of young mares from similar habitats into the BST wild horse herd, for the benefit of upgrading genetic variability and robustness is an excellent, and much-needed, plan of action, in my opinion.

I especially commend the Forest Svc. for their inclusion, in Alternative #2, of the decree for 'actions to increase genetic variation, so that the observed heterozygosity of the herd will not continue to decline below the critical level and the fitness of the herd, therefore, will not be expected to continue to decrease.' This is essential to the robust fitness and long-term sustainability of the BST herd.

There seem to be **THREE MAJOR POINTS OF CONSIDERATION** (at the macro level) within this Plan Revision as to the optimal number of horses in the BST, all of which carry a range of varying opinions as to interpretation, and thus applicability, of supporting science. I'd like to briefly comment on these points separately (below), and provide certain opinions and content sourced from specialists whose research and 'educated opinions' might vary from the NFS's position(s). Two of the primary sources of this information are the American Wild Horse Preservation Campaign, and the Wild Horse Freedom Federation.

Appropriate Management Level/AML

There is continuing debate about what constitutes sustainable wild horse populations on the range or in any given HMA. It has been said that the AML numbers were never calculated to protect wild horse and burro [WHB] populations, but were instead established by the number of wild horses and burros that existed in 1971 when they were considered "fast disappearing."

There are also claims that the BLM/NFS is highly influenced by the commercial livestock industry that views wild horses as competition for cheap, taxpayer-subsidized grazing on public lands, and that there is currently a directive within the Agencies to vastly diminish the overall population of WHBs. And while they are absent on the great majority of public lands (e.g. posing no grazing competition), where WHBs *are* allowed they are forced to share resources with cattle and sheep by whom they are exponentially outnumbered. A further fact/opinion put forth: The wild horse [so-called] "AML" number is based on the allocation of 80% of forage resources **in designated wild horse and burro habitat** to privately-owned cattle and sheep. This is not acceptable.

Specialists in WHB issues often state that the AML numbers are routinely used as a way for the Agencies (and some western politicians) to say there's an overpopulation of wild horses on federal lands. This, despite the fact that horses inhabit just 12 percent of federal rangelands and are outnumbered on these lands nearly 50 to 1 by private livestock.

The National Academy of Science's 2013 report also clearly stated that considerations of environmental variability and change, changes in social values, and the discovery of new information **require that AMLs be adaptable**.

Lastly, reports (one source I believe is the 1989 Ochoco NF LRMP) show that the current elk population is many multiples greater than historically, putting much greater demand on available vegetation, especially in winter. Yet the wild horse population has increased nowhere near that amount. Horses should not have to 'pay for' the increased elk numbers and their consequent demands on forage and landscape.

The most limiting factor is winter forage.

I would strongly like to see the Forest Service maximize winter forage availability by adjusting livestock grazing in wild horse winter range areas, thereby giving more forage allocation to horses rather than livestock and better insuring they successfully survive the winters. This would help lessen 'harsh winter forage conditions' cited in the Plan Revision document. Another consideration: climate change also may mitigate this 'harsh winter forage' situation considerably, by causing less-harsh winters.

I also agree with comments put forward which state that animals would suffer in harsh conditions of prolonged and deep snow regardless of the *size* of the herd and that it should be dealt with by allowing emergency feeding. I don't feel this should be an ongoing action, but in certain rare instances is viable. Precedent does exist; example: emergency feeding of elk in the Reserve near Jackson, WY.

I question the veracity (and equitability) of this statement found in the Plan Revision document: "Therefore, the Territory must supply the complete forage needs for the horses year-round while elk and deer are free to roam to adjacent lands (see Wildlife Resource Report)." This puts forth that, although the wild horses have to 'stay home' (within their designated territory), the elk and deer do not (of course) BUT they're also allowed to eat the horses' food thus reducing forage volume and availability for the horses.

Vegetative degradation

When considering wildlife presence the analyses within the Plan Revision document often make it seem like wild horses are the *only* animals affecting vegetative degradation. [e.g., one example: "... removing horses will lead to the fastest improvement in stream temperatures"]. What about all the other large and impactful animals (particularly cattle, elk, sheep) that share the same areas and resources? It seems to me there's an inherent bias against the presence of wild horses which recurs frequently throughout the document.

Specialists claim that the NFS/BLM limits wild horses (and burros, if present) on HMAs, but favors livestock grazing. A PEER report [e.g. "BLM weighs wild horse impact much more heavily than cattle"] pointed out: *"The method used by the U.S. Bureau of Land Management to assess range conditions is seriously skewed toward minimizing impacts from domestic livestock and magnifying those from wild horses (and burros)."* This bias has to cease for any fair vegetative/range management to be carried out.

Here are some additional scientific conclusions which lend key perspective to the issue of ecosystem degradation: "In addition, the horse's digestive system does not thoroughly degrade the vegetation it eats. As a result, it tends to 'replant' its own forage with the diverse seeds that pass through its system un-degraded. This unique digestive system greatly aids in the building up of the absorptive, nutrient-rich humus component of soils. This, in turn, helps the soil absorb and retain water upon which many diverse plants and animals depend. In this way, **the wild horse is also of great value in reducing dry inflammable vegetation in fire-prone areas** [my emphasis added]." Wild horses should not be used as scapegoats for range degradation that is in fact primarily caused by private livestock. The Western Watersheds Project acknowledges that "the main cause of degradation of public lands in the arid west is livestock use and not wild horses."

Within the Plan Revision document there is a statement which says, "... the decision(s) to be made do not involve the determination of whether livestock grazing should take place in the Big Summit Territory *or how many livestock should be permitted*." [emphasis added] If this is the case, then how can your analysis determine what portion of the 'damage' is actually and directly attributable to wild horses?

Again, I would like to express my appreciation for the opportunity to weigh in with my opinions and **suggested changes** regarding this **Ochoco Wild Horse Herd Management Plan #46228**. I fully recognize that the Revision itself as well as the determination of what truly is the scientifically optimal number of wild horses kept on the BST are both very big issues.

Respectfully submitted,
Gayle Casselman
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