

Ochoco National Forest
Lookout Mtn. Ranger District
Wild Horse Adoption Center project

To: Slater Turner

May 24, 2022

The Central Oregon Wild Horse Coalition would first like to register our concern that no formal notification of this project was provided to the Coalition, despite our history of commenting on all proposed actions within the Big Summit Wild Horse Territory or related to the management of the Big Summit horses, which would likely impact the wild horse herd or their habitat. Notifying our Board members does not constitute official notification of a known “interested party”. We will appreciate future notifications addressed to: Gayle Hunt, President/Founder, Central Oregon Wild Horse Coalition, gdhunt4@gmail.com. You also have our hard-copy mailing address on file. The failure to notify us regarding this proposal is especially troubling, as we had first suggested the Crooked River National Grassland Headquarters would be a prime location for a wild horse awareness, adoption, and work center, over a decade ago.

At the outset, we must state our extreme disappointment that the proposed Wild Horse Adoption Center does not rise to the vision we had previously expressed, which would have encompassed the following objectives:

- The public desires and deserves to know the true and complete story of wild horses in America, specifically those residing on the Ochoco National Forest, and seeks reason to trust the Forest Service’s commitment to the humane and sustainable management of these horses.
- Prospective adopters need alternatives to taking a raw wild horse home with them, such as options like the BLM/Mustang Heritage Foundation’s Trainer Incentive Program.
- Forest Service staff could develop a level of professionalism that would transcend past and present conflict and culture, and Agency disdain for wild horses, and would evolve into more competent and creative wild-horsemanship into the future.
- The center could serve as an accredited training base for a mobile wild horse service corps, which could accomplish tasks such as rangeland analysis, restoration, water development, censusing, fertility control, and possibly horse training, and more (recent iterations include an Oregon contingent of a Veterans Wild Horse Service Corps presently being introduced in Colorado).
- The center would set higher standards of wild horse handling and care than currently exist at other Forest Service/BLM wild horse and burro facilities; with special attention given to disease and injury prevention and response. Facility would have around-the-clock attendant whenever horses are present.
- Facility could serve other agencies and jurisdictions, providing all entities share goals of professionalism and high standards for wild horse welfare.
- Facility could serve as regional wild horse ecology/holistic habitat management Research center, potentially interfacing with Service Corps or other workforce.

- Facility would assure National Forest Service Wild Horse and Burro database is fully functional to identify and track horses, that external and readily-visible identifying brands are applied, compliance checks are conducted, and titles are issued in a timely manner.
- Wild horse volunteers could be trained, and the program managed, at the center. Volunteer duties could include pre- and post-adoption compliance checks.

Instead, this proposal is a massive expenditure which accomplishes nothing more than adoption of a relatively few horses, which can be done from existing facilities.

In March of 2018, the Central Oregon Wild Horse Coalition met with new Forest Supervisor Shane Jeffries for the first time. Mr. Jeffries appeared to take a positive and objective view of the Big Summit horses; an attitude which we had long awaited in local Forest Service management. He proposed a new management plan that drew from a scientifically-derived, realistic carrying capacity, and a multi-functional Wild Horse Center off-range concept. We felt he had read our public-interest non-profit minds for the last two decades, or at least our emails, and that the Forest Service had shifted to wild horse policies more aligned with broad public sentiment, true science, and the intent of the Wild Free-Roaming Horses and Burros Act.

On May 8, 2018, we had a second meeting, hoping for progress toward shared goals previously expressed. Instead, Mr. Jeffries seemed annoyed and unclear as to why we were even there. The progressive concept of a Wild Horse Center had fallen into the dreaded abyss of “a collaborative team of County leaders and stakeholders” and AML was to be decided in like manner. We provided the Forest Service with a Wild Horse Center design outline (enclosed) and a copy of the Wild Horse Training curriculum I was asked by the Native American Humane Society to write for the Confederated Tribes of Warm Springs.

If the project does move forward, despite self-imposed limitations placed on its value and potential for success, certain minimal aspects of the analysis must be addressed:

- 1) The construction and operating costs must be fully disclosed, and compared to other alternatives through the formal NEPA process; not a Categorical Exclusion.
- 2) Complete incident response and prevention protocols must be developed to address injuries, foaling, escape, break-ins resulting in harm to the horses, fire, and disease outbreak. The facility location has experienced Pigeon Fever, and Strangles has been experienced at nearby equine facilities. The pathology presently plaguing BLM's Cañon City holding facility has been determined to be EIV and has killed at least 144 horses. In May, BLM's Wheatland facility lost 11 horses due to Strangles. The Modoc National Forest's Double Devil holding facility experienced numerous injuries, escapes, deaths, and a Pigeon Fever outbreak for which veterinary staff prescribed inappropriate responses and the Forest failed to postpone adoption events or limit other public contact. Such incidents are largely preventable, but we have no assurances from the Ochoco National Forest that preventative and responsive plans are developed or will be when the first horse arrives.
- 3) The facility must not be considered operational and prepared to accept horses until all security measures are in place; to include perimeter fencing and access limitations, surveillance cameras, properly spaced and segregated pens, shelters, alleyways, loading/off-loading, quarters for caretakers,

medication and first aid supplies for horses, external contracts in place for emergency veterinary and large animal rescue services, emergency fire suppression and evacuation plan.

4) All staff must be fully trained in the recognition and proper response to indications of horses under stress or in danger, including casting in pens/shelters, colic, impending or distressed foaling, and injuries. Staff should be versed in feeding practices as related to injury and illness prevention, such as spacing of feed piles, sudden feed changes, and proper feed storage. Staff should be trained in the safe handling and loading of wild horses.

5) Staff must be trained in the art and science of accurate horse aging, since this determines whether the horse will be placed according to Adoption or Sales Authority rules.

6) Facility must be, as per the Forest Service Wild Horse and Burro Manual and as promised in the May 7, 2021 Decision, equipped and staff fully trained, to apply externally-visible freeze brands to adoptable horses, and freeze brands and/or other such ID to Sales Authority horses. Identification ID and other data must be entered into a National tracking database.

7) Forest Service must be prepared to either administer vaccines to horses or contract for veterinary services to administer vaccines, to be entered into database with other information relevant to each individual horse. Horse deaths at the Cañon City holding corrals were reportedly due to failure to vaccinate.

8) Veterinarian/Farrier agreements and contact information must be established in advance of arrival of horses to the facility and readily available to all staff. There is currently a shortage of mobile vets and qualified farriers in Central Oregon, and most will be hesitant to treat unhandlable horses. Develop plan and purchase equipment to facilitate safe treatment of wild horses.

It must be said, also, that the outcome of current litigation could render the Wild Horse Adoption Center an unneeded expenditure. For this reason, we ask that other alternatives be authentically developed and presented, such as further improving the existing Ranger Station corrals and handling components, or transporting captured horses to the Hines BLM corrals. Both of these options are more attractive in drier, warmer months than when the horses would typically be captured, though both have been employed previously. In terms of adoption success, this will be challenging even at the proposed facility, since the hay and pasture availability situation will be more acute, and prospective adopters may be reluctant to travel from distances in winter.

The scale of removal imposed by the Ochoco National Forest's May 7, 2021 Decision is unprecedented, and projections of adoption demand over the next 5 years are probably quite optimistic given wild horse market saturation and the unassailable cost of owning horses. We are unwilling to blindly accept the Forest Service's supposed preparedness for the safe handling of multiple bands of horses, with young, old, injured, and hormonal stallions, and the eventualities which are predictable and those that are not. The wild horse management "analysis" which brought us to this point was a compilation of assumptions and projections; lacking in real-time evidence. This Wild Horse Adoption Center, if no more reality-based than the EA, will be the final assault on our Big Summit Herd and a grotesque embarrassment to the Forest Service.

As stated previously, an additional, and very critical, concern with this proposal is the Ochoco National Forest's presumption of a Categorical Exclusion governing the extent of analysis supporting the anticipated adoption center. It is within the realm of reasonable possibility that the strict facility

construction could be construed as not requiring intensive analysis. Whether a half-mile of new road construction, or potential harm to wetland ecology constitute an absence of impacts worthy of consideration, is beyond the purview of the Central Oregon Wild Horse Coalition and most interested citizens. However, mirroring the Big Summit Wild Horse Territory Management Plan EA and Decision, this project fails to consider significant impacts on the human environment; potential effects on the wild horses.

We have enumerated several measures which need to be taken in order to mitigate the impacts on the horses. It is unreasonable to expect the public to believe the Forest Service will consider all the factors and implications we have listed herein, without complete disclosure of those potential impacts and alternatives which genuinely constitute solutions. This cannot progress under a Categorical Exclusion.

Additional concerns are based on the ambiguity of the Wild Horse Adoption Center's purpose, depending on who is representing the Forest Service, when, and which audience is targeted in the Forest Service's description of the project.

As an example, the Forest Service's response to inquiries regarding the implementation of the May 7, 2021 Decision was that "panels ordered had been held up in the supply chain disruption", and then that a handling chute was "the wrong size" and had to be reordered. Complicating the explanation was a Forest Service statement (May 11, 2022 Crook County Natural Resource Advisory Committee meeting when asked about cost of project), that \$93,000 of 2021 year-end money had been spent on panels in order to handle horses which were captured off-Territory. Capturing wild horses from off-Territory locations does not require NEPA analysis or the implementation of a revised management plan, which was how the Forest Service justified the year-end purchase, yet the panel acquisition has been linked to the implementation of the Decision (see Bulletin article of November 29, 2021, enclosed, and refer to multiple statements made by FS at Crook County Natural Resource Advisory Committee meetings). Too, the Forest Service had already mitigated the frequent presence of wild horses on the primary complainant's private property by unlawfully providing the landowner with Government-purchased cattleguards. It is difficult to place trust in the Ochoco National Forest, and to believe in their intention and capacity to deliver on the promise of acceptable standards of humane treatment, wild horse welfare, or fundamental integrity.

Secondly, although our early vision of a wild horse center included a program for the mutual-benefit of at-risk humans paired with wild horses, we did not propose an element of on-site wild horse training singularly for the sake of adding value to adoptable horses. Neither did the Scoping Letter mention an aspect of wild horse training; this was alluded to by the Forest Service at the Crook County Natural Resource Advisory Committee meeting of May 11, 2022.

If the Forest Service is indeed contemplating a component of wild horse training in its Wild Horse Adoption Center design, it certainly should have been disclosed to the public in the Scoping phase. The Forest Service should have been cognizant of the additional expense, impacts, and liability of an on-site setup for the separation and moving between training pens. The Forest Service should have been cognizant of impacts to the horses being trained, as those impacts can be significant when a trainer is poorly matched with the Big Summit horses' temperament.

A trainer, whether the services are performed off-site or on-site as the Forest Service admitted, would be subject to the formal, advertised Government contracting process. The contractor selection process is, by law, competitive and requires subject matter experts to determine the best value to the Government of the bids/proposals received. Performance metrics, in the case of "wild horse training

success” would be highly subjective due to the nuances and spectrum of wild horse acceptance of domestication. For these reasons, the prospect of a contracted trainer would be both expensive and redundant when there are existing programs meant to manage adopters’ preference for gentled horses.

Mustang Heritage Foundation’s Trainer Incentive Program (TIP) pays individual (certified) trainers to provide basic “competencies” to wild horses. The horse must be easily haltered, leadable, trailer-trained, and able to have all four feet safely trimmed. The trainer can select the horse, or the adopter can select the horse, but training occurs at the trainer’s facility. The horse is then adopted at the standard \$125 fee, while the trainer is compensated up to \$1000 depending on the age of the horse, by the Mustang Heritage Foundation.

Prior to the dissolution of the BLM/Forest Service partnership, Forest Service horses could participate in Mustang Heritage Foundation programs. At this time, the Forest Service would either need to reconstitute this partnership (at least regarding TIP), or negotiate a partnership directly with the Mustang Heritage Foundation. A third option might be for the Forest Service to develop its own program, which would still eliminate the hard costs and liability of contracted or Forest Service staff trainers.

In any case, the Ochoco National Forest needs to first decide if any wild horse training is to occur at the proposed facility, and then it needs to be fully disclosed to the public it serves.

Much about this proposal is disturbing. This is primarily due to the absence of details and transparency, but also because the Forest Service’s capacity to design and subsequently implement this proposal is questionable – based on observed deficiencies in the Agency’s understanding of and concern for appropriate wild horse management at any level.

We ask that the Ochoco National Forest reissue this Scoping Letter in light of the potentially-significant impacts associated with the project in its entirety.

Respectfully,

Gayle Hunt

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