

Modoc National Forest
Wild Horse and Burro Specialist
225W. 8th St.
Alturas, CA 96101 re: DGPWHT Middle Section

OBJECTIONS

Central Oregon Wild Horse Coalition
Oregon Wild Horse Organization

October 19, 2024

Modoc National Forest Staff:

After engaging in the public involvement process from the first scoping documents, we remain unclear as to the exact and entire purpose of this proposed action, other than the reasoning that the Decision will formally add a portion of the Middle Section to the Devil's Garden Plateau Wild Horse Territory in compliance with the Court Order.

The Objection Filing notice states "Under Alternative 1, the East and west Sections of Devil's Garden Plateau Wild Horse Territory (DGPWHT) will be joined with a Middle Section. Alternative 1 also expands fertility control measures. This decision will implement the 2024 (Final) Territory Management Plan described in the EA, Appendix II. The 2024 TMP will supersede the 2013 Territory Management Plan."

That may seem straight-forward enough that even a wild horse advocate could comprehend the intended purpose of this action. However, the Draft EA, at 52, states "The 2024 AML evaluation is intended to supplement the 2013 AML Evaluation until such time that a new AML evaluation is completed for the entire Territory." So, on the one hand, the 2024 TMP will supersede the 2013 Territory Management Plan, while, on the other hand, there will be a new AML evaluation completed for the entire Territory, maybe, some day. Appendix IV, Draft Appropriate Management Level Evaluation For the Middle Section of Devil's Garden Plateau Wild Horse Territory, states "This Draft AML Evaluation tiers to the previous 2013 AML determination report (FS 2013a)." Yet, Alternatives are presented which offer two different AMLs, indicating that the current action does, indeed, evaluate the AML for the entire Territory. Logically, were the singular purpose of this action to promulgate the terms of the Court Order to redraw the Territory boundary to encompass the (entire!) Middle Section, the existing AML, however questionably derived, should have remained intact pending future, thorough, re-evaluation. And, "expanding fertility control measures" should have been analyzed in a legitimate revision of the Territory Management Plan, rather than merely being dumped into this limited action in order to authorize GonaCon. Or, preferably, the addition of any portion of the Middle Section should have included full and objective analysis resulting in an updated, comprehensive Territory Management Plan to include fresh and authentic evaluation of AML for the entire Territory. Our perplexity, here, is justifiable.

With this fundamental absence of clarity, stating our Objections to Forest Service Responses to our Comments seems somewhat superfluous. However, in the interest of communicating our positions on several important issues, we state our official Objections and Remedies at this time.

1. GonaCon

Forest Service Responses did little to alleviate our concerns. In fact, the EA's 15-page diatribe only confirmed our findings in regard to potential adverse effects on GonaCon-treated mares.

a) The prediction that GonaCon would not cause abortions still does not overcome warnings in the 2013 NAS Report. BLM has anecdotal "evidence" showing that some mares were treated with GonaCon and foaled at "normal rates" (EA at 53) and further discussion (FEA at 58) cites the 2013 NAS Report's speculation on the unlikelihood of GonaCon causing abortions. However it is not stated whether any of the mares observed were known to be pregnant when injected. Importantly, our specific concern, also arising from the NAS Report, has not been addressed:

NAS Report at 132, (Contraception Comparison chart), our Comments at 4: "Sexual behavior may not be cyclic, inasmuch as ovulation appears to be blocked; Should not be administered during early pregnancy because *abortion could occur*; Few data on horses" (emphasis added).

The FEA, at 58, dismisses a study for lack of consideration of "other factors", ironically giving importance to "social status" at the same time as the Forest Service fails to consider the nuances of such status in countless studies assumed to measure non-reproducing members of the herd retaining status; merely by their physical proximity to other horses.

At 59, the Forest Service then slinks away from the counsel of Ransom et al. (2013) against the risk of out-of season births due to mares being treated with either PZP or GonaCon by stating "they (wild horses) are not a rare species at the regional, national, or international level, and genetically they represent descendants of domestic livestock with most populations containing few if any unique alleles (NAS 2013). Conspicuously, a word search for "alleles"; "rare"; "unique" and "domestic livestock" does not produce the above statement as existing in the 2013 NAS Report. There are, however, passages which advise agencies to preserve rare alleles *which are found in wild horse herds*. And, there is new research, in which Dr. E. Gus Cothran participated, which proves decisively that some wild horse herds are not closely related to domestic horse breeds (*Genetic Dynamics of Mustang and Feral Horse Populations in the Western United States*; E. Gus Cothran et al. (2024)). It cannot be said that the Devil's Garden Plateau wild horses are, or are not, in the class of herds deviating from readily identifiable domestic heritage, since they were not included in the study (or the NAS Report's Appendix F).

We do not presume to understand Griffin's reasoning for including, here, what appears to be his own subjective opinion presented as an excerpt from the NAS Report, in lockstep with the current trajectory of agencies' genericizing and homogenizing wild horse DNA across the West. But the statement was made - part of the FEA - and the statement is provably false.

b) The FEA, at 54, does not provide additional information which addresses the risks of cancers associated with decreased progesterone; the presence of "GnRH receptors in tissues outside of the pituitary system"; or the "changes in ovarian structure and function" of the treated mares (FEA at 57).

While the Modoc National Forest is hardly the first or only field office to ignore the explicit warnings of the risks of GonaCon, it does bear equivalent culpability to the worst offenders who fail to consider potential deleterious effects on wild mares in the suppression of natural reproduction. These are not merely "possible", but "likely" effects, and at best are "unknown", and the public rightfully demands

adequate, empirical evidence and reasonable assurance that mares and/or foals will not be negatively impacted by the broad application of a product which has been insufficiently researched in wild horse populations.

c) As we had previously demonstrated in our formal Comments, there has been no long-range study which provides data relative to wild mares' return to fertility following application of GonaCon. Instead, we find repeated, patronizing statements from Griffin and the Forest Service (FEA at 52, 56, 57, etc.) to the effect that "if" mares don't return to fertility for the remainder of their respective lifetimes, (essentially, *permanent* sterilization), that's consistent with agencies' desire to render wild horses "non-reproducing", citing the Wild Free-Roaming Horses and Burros Act at § 1333(b)(1) "...or other options (such as sterilization, or natural controls on population levels)". Apparently this is derived from (H. Report 95-1122) "Where an overpopulation is determined to exist, the Secretaries must decide how excess animals will be controlled. In this regard, the bill mandates that consideration be given to options to use sterilization or to allow natural controls (such as disease and parasites) to achieve appropriate management levels. If the Secretaries find that such methods will not work, they are then directed to remove excess animals from the range until appropriate management population levels are achieved." It is unclear whether Conferees anticipated natural threats of "disease or parasites" or if they envisioned the introduction of agents of destruction, but it is doubtful the public would assent to disease or parasites as population control. But this context is not mentioned, while "sterilization" has been retained through the decades since the 1978 amendments to the Act, as an acceptable control of wild horse herds. However, this Conference Report passage is predicated with "Where an overpopulation is determined to exist, the Secretaries must decide how excess animals will be controlled." Yet, the Forest Service has not determined that there are indeed excess wild horses in or near the Territory, or if so, how many are excess; the Forest Service only identifies and affirms an AML that is essentially unchanged from the Territory's designation. The Forest Service action's Purpose and Need may not include re-evaluation of AML for the Territory, but the FEA presents an Alternative with an AML deviating from the long-standing 206-402; which in effect assumes reconsideration of the current AML.

Also, removal cannot occur until an overpopulation has been documented according to § 1333 (b)(1) and (2), wherein removal is necessary "so as to restore a thriving natural ecological balance to the range." Without comprehensive evaluation – not regurgitation of questionable 2013 analysis – and notwithstanding both the antiquity and the circumstances of the 2013-vintage AML, there can be no assumption of "excess" to justify the "sterilization" of any Devil's Garden Plateau wild horse.

Additionally, the Public Rangelands Improvement Act-era Conferees also stated (H. Report 95-1737) "...with close attention to maintaining *stable and viable breeding populations* of animals that are not in excess of appropriate management levels." (emphasis added) Contrary to current direction, permanent sterilization is NOT authorized, whether mare or stallion, chemical or surgical, and the advocate community, including the Central Oregon Wild Horse Coalition, will not accept this practice.

Remedy:

The Forest Service must reconsider all use of GonaCon, or any other form of population control likely to result in permanent sterilization of either gender. This would include the use of PZP repeatedly applied to the same mares. The Forest Service must be more proactive in determining whether a drug or process is realistically and completely safe for use in wild horse populations; limited research and EPA certification do not necessarily equate to acceptable safety levels.

2. Principal Use

The Forest Service is dead wrong in its dogged interpretation of the “principal use” doctrine. Responses, at 20, for example, states “The term “principle use” is used in the definition of a Wild Horse and Burro Range (36CFR222.60(14) and not a Wild Horse and Burro Territory. WHB territories are managed as an integral component of multiple use resources (36CFR222.61(a)(1). There have been no WHB Ranges established within the National Forest System by the USDA Secretary. Pryor Mountain Territory in Montana was established in 1974. It is managed as a Joint Management Area with BLM and NPS Pryor Mountains Wild Horse Range which was created by Interior Secretary Udall in 1968.”

Agency regulations cannot rewrite Congressional Acts. And, agencies are not granted deference in their interpretation of statutes when there is no ambiguity (or when the Supreme Court eliminates Chevron Deference). The Wild Free-Roaming Horses and Burros Act is not ambiguous on the point of ‘principal’ use; “...which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands.” (16 U.S.C. § 1332, Definitions (c))

The word “range” appears to have different meanings strictly according to context, in the Wild Free-Roaming Horses and Burros Act and certainly in Congressional Conference Reports. (H. Report 92-681) points to a stern distinction made between the envisioned free-roaming, unconfined wild herds, protected and preserved in their natural habitats, and in keeping with the multiple use concept for the public lands; and... zoos. In contrast, some vastly different management concept was ultimately “eliminated by the committee” (S. Report 92-242) “The emphasis on specific ranges as a management tool for the protection of the wild free-roaming horses and burros as contained in the original version of S.1116 has been eliminated by the committee.” Apparently, this version of a “range” consisted of a relatively small area wherein horses may have been “intensively managed” and at the very least, were fenced in and their wild, free-roaming behavior was reduced to a zoo-like existence. This scenario seemed also to preclude adherence to “the multiple-use concept for the public lands” and was instead, a wild horse “zoo”. This was discouraged, disparaged, and rejected by the committee. The definition, then, of “range” found at 16 U.S.C. § 1332. Definitions (c) reads “‘range’ means the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands.” (Note: “range” is used in Conference Reports (H. Report 95-1122) and in the Wild Free-Roaming Horses and Burros Act (§ 1333 (b)(1) *and* (2), above; *not* referring to special “ranges”) But, this is not inconsistent with further Conference language, which the Forest Service has often cited: The “principal goal of this legislation is to provide for the protection of the animals from death and harassment at the hands of man and not the single-use management of areas for the benefit of the wild free-roaming horses and burros.” (H.R. Conf. Rep 92-681 (1971). The two are not incongruous, because no wild horse residing on public lands will ever live in a single-use environment. *All* will be subjected to the pursuits of man; hunting, fishing, camping, bird watching, off-road vehicle use, on-road vehicle use, road building, bike riding, timber harvest and/or mining, and land managers managing. Nearly all will be subjected to live-stock grazing. Many will be subjected to the nefarious actions of man; wild horse harassment and killing. The conference reports clearly contemplated a distinction between a zoo and a “range” which allowed for multiple-use management, free-roaming, natural behavior, and which *is* devoted principally but not necessarily exclusively for the horses’ welfare; and they chose “range”, as defined in the Wild

Free-Roaming Horses and Burros Act. In terms of “co-equality”, it must be noted that many wildlife species can and do live as transient or part-time residents within a wild horse range; livestock are there as lessees and exploiters of publicly-owned natural resources; while the wild horses and burros have no other lands. There can be no varying tiers of preservation and protection within those public lands which provide for basic habitat needs for viable, self-sustaining, wild populations; as Congress contemplated. There are no subsets of “range” mentioned in the Wild Free-Roaming Horses and Burros Act; such as “Herd Area”, “Herd Management Area”, or “Territory”.

The Wild Free-Roaming Horses and Burros Act defines “excess”, but ties it to the achievement of a Thriving Natural Ecologic Balance that is not defined. This vague resource condition was then reliant on agencies’ integrity, guided by the spirit of the WFRHBA and the will of the people served by the agencies. The WFRHBA retained the definition of “range”. That has not changed. It is further affirmed in Conference language, both in 1971 and 1978, that the intent of Congress was to grant wildness, and protection, for the wild horses and burros; not a “zoo-like” existence. And not a habitat so impinged upon by “uses” which are NOT protected by a Federal Act, so as to not be functional in providing the basic needs of the wild horses and burros. This promise is not restricted to horses and burros living on the very-limited number of “special Ranges”, but to *all*, in harmonious relationship to other wildlife and the land. It’s not complicated. (See H. Report 92-681; S. Report 92-242; H. Report 92-480)

Wild horses must be managed in natural symbiotic relationships with wildlife and their habitat, but that same mandate does not apply to domestic species whose presence is discretionary. The WFRHBA appears to use caution when referencing multiple use; in § 1332. Definitions (c), original 1971 text, it describes “the multiple-use management concept”, and in (f)(2) “multiple-use relationship” from the 1978 PRIA amendment. In 1971, the Forest Service’s ‘Multiple-Use Sustained Yield Act’ and BLM’s ‘Classification and Multiple Use Act’ would have governed, whereas the MUSYA and FLPMA would have governed the 1978 amendment, were it applicable to “public land dedicated to specific uses” at the time. (FLPMA Sec. 302.(a)) The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of the Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.”) (emphasis added) But specific statutes were not cited – just the general multiple-use management relationship/concept, as if conferees were aware of the messy implications. However, with the most current definition of multiple-use, the Multiple-Use Sustained Yield Act of 1960, as amended, reads:

SEC. 4. 16 U.S.C. 531A, As used in this Act, the following terms shall have the following meanings: (a) “Multiple use” means: The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.”

Unquestionably, there is sufficient “multiple-use” latitude for providing wild horses the habitat needed for their continued existence, “principally but not necessarily exclusively to their welfare”.

Remedy: The Forest Service must consider the wild horses’ fundamental habitat and viability requirements in light of proper construction of Multiple Use statutes relative to the Wild Free-Roaming Horses and Burros Act. “Principal Use” essentially guarantees basic habitat components required by wild horse herds, not that horse areas should be unavailable for *any* other purpose. In all wild horse management actions, and all other actions which could impact wild horse herds, basic habitat requirements for viable horse populations must be preserved.

3. Genetics

Forest Service Responses regarding genetic diversity only confirm that no substantive, proactive efforts are planned to maintain genetic diversity, though adding the Middle Section, in theory, *should* help facilitate sustainable variability into the future. Discussions under the heading Alternative 1 (FEA at 12) state that “Management actions will be intended to enhance habitat connectivity, herd genetic diversity, and herd health.” But we do not find examples of how those actions will produce those results. In fact, Comparison of Alternatives (FEA at 24) indicate that under Alternative 1 “0-40 adult horses would use the Middle Section seasonally and incidentally”; essentially what is presently occurring.

The Forest Service’s genetic health strategy is fatally flawed. The Central Oregon Wild Horse Coalition had questioned whether genetic analysis had been conducted within allotments and pastures (Comments at 1). The Responses direct us to the DEA at 27, which is a generalized compilation of Dr. E. Gus Cothran’s genetic diversity testing for the entire herd; no specific origins of the sampled horses are noted. It does appear, however, that Observed Heterozygosity (H_o), which is the only value that agencies commit to examining, shows a trend of dropping to barely above the accepted standard (.66): 2016 = 0.710; 2021 = 0.706; 2022 = 0.680. Cothran’s findings for the Devil’s Garden Plateau horses (2021-2022) were characteristically conflicting “Genetic variation, as indicated by heterozygosity, in the Modoc National Forest feral horse herd is below the mean for the feral populations and domestic horse breeds.” And then, he states “Variation levels are good and there is no reason for concern at present variability levels.” It is difficult to witness the Modoc National Forest’s reliance on a single, inconsistent source of critical information. And this still does not address our concern about small populations relegated to cow pastures that are even assigned their own AMLs. Neither did the Forest Service answer our question about the potential differentiation between the two distinct phenotypes in the Territory. Phenotype does not always follow genotype, but the reasons for differences in size, conformation, and color often do trace to varying DNA in recent ancestors. This would suggest either 1) distant relationship which would preclude intentional interbreeding or 2) relationship close enough for appropriate interbreeding. At this time it appears those variables are unknown, and the Forest Service has yet to disclose whether they intend to maintain the two separate types.

The common practice of “translocation” to correct low diversity is a component of the Modoc National Forest’s genetic diversity management plan. In Alternative 1, the plan merely amounts to letting East meet West, rather than importing outside stock. Yet, the DEA describes the two phenotypes peculiar to each Territory section, which, as noted above, have no recorded separate genetic analysis informing the advisability of interbreeding. Alternative 4 also intends to co-mingle East and West horses to increase diversity.

But, it is the Forest Service Responses which we find problematic. At (Responses) 31, the Forest Service explicitly states “...then develop a translocation action plan to introduce 10 mares from a similar WHT or HMA every 10 years. Select introduced mares that are phenotypically like those occurring on DGPWHT.” There are multiple problems with this statement. First, other genetic experts advise that 1-2 mares may be introduced per generation, or 10 years, whereas the 2013 NAS Report does, indeed, plainly suggest 10 mares every 10 years. This is one of many shortcomings with the go-to solution of translocation. Suggestions of mare introduction never seem to be refined by variables such as size of receiving population, and there is an obvious and significant difference between 1-2 and 10, the latter possibly resulting in disastrous alteration of the at-risk herd. Secondly, the narrative in the NAS Report loses context if the reader does not objectively view the discussion of “metapopulation” in its entirety. The Report clearly provides direction for restoration of populations using genetic supplementation. However, the discussion occurs within the premise of HMAs being in close geographic proximity, or those having historic genetic exchange. (the DGPWHT herd is said to be “isolated”) Agencies have long taken this as license to maintain wild horse populations at below-viable AMLs, with the back-up plan of rebuilding Ho through outside DNA. That was not the NAS Report’s intent, nor the intent of Dr. E. Gus Cothran in his oft-cited 2009 letter to BLM requesting the Pryor Mtn. Herd be maintained at viable population levels so as to avert the need for restoration of the herd at a later date. He is frequently quoted as saying “It also is important to understand that within a closed population, genetic diversity does not increase without the input of new genetics from an outside source. What this means is that if the size of a population is lowered and genetic variation is lost, which is inevitable, then enlarging the population size does not increase the genetic variation, it only slows the rate of loss of existing variation.” But the quotation invariably omits his letter’s primary purpose, which was that the BLM should NOT remove horses only to leave the distinctive Pryors vulnerable to genetic risk. This is also the theme as the NAS Report discusses translocation – as a *restorative* measure, or a management strategy *only* when herds are somewhat related.

The Forest Service then, again, turns to the 2013 NAS Report, to show “that DGPWHT is effectively indistinguishable and interchangeable in terms of their genetic composition (i.e. see the table of Fst [values] in NAS 2013)” (FEA at 62). Yet again, the NAS Report does not say this. “The table” is Appendix F, and the Devil’s Garden Plateau wild horse herd is not found in that matrix. Whether or not this was intended to mislead is not known. Further, there is reason to believe the Fst values in Appendix F were calculated to exaggerate the genetic similarity between wild horse herds. Noted genetics expert DeEtta Mills, Ph.D. (Florida International University, Genetic Forensics) found comparative values for 6 of 7 Oregon wild herds to be significantly higher than are expressed in Appendix F. The higher values exceeded the threshold which informs managers that herds are sufficiently compatible for purposes of translocation. It is also recommended that compatibility must consist of both genetic proximity *and* habitat similarity, which reinforces the premise that the term “metapopulation” absolutely does not include all wild horse herds in the Western United States, but rather, those which are geographically close or which have historically exchanged DNA. The Modoc National Forest plans to import horses which are simply “phenotypically like those occurring on the DGPWHT”.

Forest Service and BLM appear to be engaging in a concerted effort to not merely downplay unique DNA in wild herds, but to eliminate it. This was recently demonstrated in the study mentioned above (p.2) *Genetic Dynamics of Mustang and Feral Horse Populations in the Western United States* (p.1, also see Figure 3, p. 19). The research concluded that some wild herds are not closely related to domestic breeds as assumed. “Relationships between populations and domestic breeds ranged from close association to one or two specific breeds to extreme divergence of the feral horses to all breeds exam-

ined.” Other important observations were “As expected, levels of population variation correlated to census size”(p.1) and “Variability was strongly associated with population size as measured by AML” (p.4). The most poignant aspect of the study relative to the DGPWHT situation is found on p.7 where the intended parameters for translocation are affirmed “However, this loss of variation can be mitigated by a low level of exchange of individuals from *geographically close herds.*” (emphasis added) The statement follows “This process will tend to homogenize the herds but this will take many generations.” Given old habits and some of the researchers’ affiliations, the study is not content to merely present data, but must offer policy advice, which we find incongruous with the Wild Free-Roaming Horses and Burros Act’s entire purpose; “Some consideration should be made to manage a few of the herds in such a way that they are preserved as is, as much as possible, for historical or, in the cases of the small number of herds with strong Spanish horse genetics, for breed type conservation.” As a cautionary tale, it should be noted that the study references that the world-renowned Kiger Herd (Oregon-OR0010) essentially ‘used to’ be Spanish, but now, is not so much; “...largely due to a change in the makeup of the herds over time.”(p.6,7) The Kigers were originally analyzed to “be of Spanish origin” (University of Kentucky), but have since been managed by introducing outside horses which “look like” Kigers, but were not genetically shown to be related. *This is exactly what the Modoc National Forest proposes.* The Central Oregon Wild Horse Coalition is not obsessed with “Spanish” heritage; in fact, we are much more impressed with findings which link wild horses to prehistoric DNA, as is found in some Oregon herds. Therefore, we do not agree with this study’s (and others, including the NAS Report) bias which subjectively assigns higher value to the preservation of Spanish lineage. With so little known about the Horse as a native, late-surviving North American species, it is reprehensible that agencies are not preserving every wild horse herd “as is”. Of course, with only cursory, Appendix F-adjacent, comparison to domestic breeds in the case of the DGPWHT horses, this action is not only unwise, but could result in irreversible effects.

Remedy: The Forest Service must begin a comprehensive DNA collection and testing program; not to merely test for Ho, but to determine the true composition of both East and West-section horses, and those trapped in small areas. Samples must be identified as to individual horses, as greater diversity can be achieved and preserved by simply retaining individuals having higher diversity values. Population size must consider each isolated subpopulation, and assure substantive contact with other populations and eliminate barriers to migration. Every isolated subpopulation must meet Effective Population Size standards (difficult with AML at 206-402). This cannot be alternatively accomplished through translocation, as success cannot be assured and, at this time, fixation index (relatedness) as compared to other herds is not known, and imported horses must also meet “physical characteristics” and “similar environment” criteria. Translocation does not substitute for Effective Population Size, as the number of random matings within a population determines genetic health, regardless of “introduced” DNA. The Forest Service must commit to preservation of the DGPWHT horses “as is”, regardless of outside experts’ declarations of “no unique genetics found”.

4. Climate Change

The FEA, at 76, states “Commentors suggested that reducing or removing livestock in exchange for a comparative level of wild horses would have a beneficial effect on greenhouse gas emissions.” Some Commentors may have suggested a straight-across “exchange” of horses for cows, but the Central Oregon Wild Horse Coalition did not. We presented the Kauffman study in the context of the ecological and monetary costs of livestock as counterpoint to the supposed financial benefit of livestock to the local community, and reminded the Forest Service that horses are non-ruminants whose greenhouse gas

emissions are negligible. We did not, and would not, suggest an AML “comparable” to the number of cattle currently on the same range. Adding the number of (actual use) AUMs for allotment acreage within the Territory (2013 EA at 74 = 19,255) to the actual livestock use in the Middle Section (which was excluded from the Territory in 2013) (2024 FEA at 38 = 6,246) would be 25,501 livestock AUMs; divided by the 5-month grazing period this would amount to 5,100 cows, which would probably be too many horses. 25,501 AUMs would also conservatively equate to \$918,252.00 in social costs of emissions alone, and just for the period the animals were occupying public lands, per Kauffman’s research at 12.

But, we do expect the Forest Service to recognize that ruminant livestock contribute substantially to the planet’s total greenhouse gas threat. We are aware that the Kauffman study “is silent on comparable impacts from feral/wild horses” and find this point to be irrelevant. As is the inclusion (Responses at 67) of the Forest Service’s commentary on wild horses’ cost to taxpayers “A cost analysis using the Kauffman social greenhouse gas cost analysis approach would also require including the associated U.S. Taxpayer costs for management cost of wild horse AUMs.” Fundamentally, U.S. taxpayers demanded the protection and preservation of wild horses and burros in 1971. Livestock producers demanded resources allocated to Federally-protected wild horses and burros for their own gain. Taxpayers were not consulted. The Kauffman study begins to touch on the potentially non-recoverable harm which this proven contributor of greenhouse gasses brings upon our one Earth. The Forest Service’s conflation of cows versus horses in terms of “cost to taxpayers” is not only gas-emitting but gas-lighting.

The Central Oregon Wild Horse Coalition is committed to healthy rural communities just as they are to healthy wild horse populations. But Forest Service allegiance to tradition rather than to solutions which honor the creativity and resilience of the American people to craft sustainable, winning directions forward, is an impediment to all interested parties.

It is unknown which NEPA Rule the Modoc National Forest is operating under at this time, or at what juncture the Forest Service may have migrated from “1978 NEPA”, to “2020 NEPA”, or “2024 NEPA” for this project. If the Forest Service has moved into the most recent iteration of NEPA, there are specific standards for climate change, and updated direction that the EA must effectively analyze effects to the same degree as would be required under an EIS. Apart from climate change guidance, listed in the EA at 73, Executive Orders and USDA directives mandate Federal agencies’ authentic analysis and mitigation of climate change; both cause and effect. Concerning greenhouse gas emissions, it was the Forest Service itself which brought the economic benefit of cattle grazing into the analysis, yet also failed to quantify social costs; the subject is well within the scope of the EA. The Forest Service is thus obligated to consider wild horse impacts; impacts *on* wild horses; impacts of permitted livestock – including management practices which entail fences which restrict dispersal away from sensitive areas and induce conditions both affecting global warming and those made less resilient to climate change; all important and related to causes and effects of climate change.

National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change p.1201:

“NEPA requires more than a statement that emissions from a proposed Federal action or its alternatives represent only a small fraction of global or domestic emissions. Such a statement merely notes the nature of the climate change challenge, and is not a useful basis for deciding whether or to what extent to consider climate change effects under NEPA. Moreover, such comparisons and fractions also are not an appropriate method for characterizing the extent of a proposed action's and its alternatives' contribu-

tions to climate change because this approach does not reveal anything beyond the nature of the climate change challenge itself—the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large effect.”

Other directives to agencies regarding climate change include:

Executive Order 13990 January 20, 2021

Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1 . Policy. *Our Nation has an abiding commitment to empower our workers and communities; promote and protect our public health and the environment; and conserve our national treasures and monuments, places that secure our national memory. Where the Federal Government has failed to meet that commitment in the past, it must advance environmental justice. In carrying out this charge, the Federal Government must be guided by the best science and be protected by processes that ensure the integrity of Federal decision-making. It is, therefore, the policy of my Administration to listen to the science; to improve public health and protect our environment; to ensure access to clean air and water; to limit exposure to dangerous chemicals and pesticides; to hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; to reduce greenhouse gas emissions; to bolster resilience to the impacts of climate change; to restore and expand our national treasures and monuments; and to prioritize both environmental justice and the creation of the well-paying union jobs necessary to deliver on these goals.*

Executive Order 14008 January 27, 2021

Tackling the Climate Crisis at Home and Abroad

The United States and the world face a profound climate crisis. We have a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents. Domestic action must go hand in hand with United States international leadership, aimed at significantly enhancing global action. Together, we must listen to science and meet the moment.

Sec. 201 *We must listen to science — and act.*

Sec 216

(b) The Secretary of Agriculture shall:

(i) initiate efforts in the first 60 days from the date of this order to collect input from Tribes, farmers, ranchers, forest owners, conservation groups, firefighters, and other stakeholders on how to best use Department of Agriculture programs, funding and financing capacities, and other authorities, and how to encourage the voluntary adoption of climate-smart agricultural and forestry practices that decrease

wildfire risk fueled by climate change and result in additional, measurable, and verifiable carbon reductions and sequestration and that source sustainable bioproducts and fuels.

SECRETARIAL ORDER NO. 3399

Subject: Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process

Sec. 1 Purpose. The Nation faces a profound climate crisis that requires the Department of the Interior (Department) to take a holistic approach to honor the Nation's trust responsibilities; address the climate crisis; advance environmental justice; and build a clean energy future that creates good-paying jobs and powers our Nation. This Order prioritizes action on climate change and establishes a Departmental Climate Task Force. This Order also provides instruction on how science may be used in the decision-making process and clarifies Departmental policy to improve transparency to the public on the Department's decision-making process.

Climate change is arguably the greatest, even existential, threat we will face. Every agency, at every level of government, and every cognizant resident of this planet, bears responsibility for being informed and engaged toward real solutions. This Nation looks to the Forest Service to lead efforts not merely to react to climate change, but to reverse it. And yet:

“The climate trends discussed in the Affected environment section reinforces the need to get the wild horse population to AML as soon as feasible.” FEA at 77

The problem with scapegoating, however, is that everyone loses. The Forest Service attempted to discredit the Kauffman study, focusing on the effects of climate change on existing resources; but the horses are victims of global warming, not perpetrators. While ‘rewilding’ projects in Europe have had remarkable restorative effects using wild horses as the keystone species, the Central Oregon Wild Horse Coalition does not expect that total removal of ruminant livestock and increasing the number of wild horses would instantaneously reverse any climate change-related shortfalls in available resources. Rewilding should be considered, but viewed through a long lens. But neither do we accept that “getting the wild horse population to AML as soon as possible” will achieve those results. This reasoning is backward, myopic, and unconscionable in light of the urgency with which we must address the causes of global warming.

Remedy:

The Forest Service, as admonished in Executive Order 14008, Sec. 201, “*Must listen to science — and act.*”

5. Origins of the ‘affirmed’ 2013 AML

The Forest Service has yet to explain the inconsistencies in the process used to determine (affirm existing) AML from 2013. As we implied in our Comments, even the Alternative which we prefer (4) lacks

supporting analysis for the AML, but this issue is more expedient if the Forest Service decides to select Alternative 1.

In Responses at 57, the Forest Service explains the use of the Animal Unit Factor of 1.2. While it is still not evident what role the 1.2 AU factor played in the 2013 AML determination, since the 2013 AML Determination seems not to reflect the 1.2 factor in its total high AML of 402, it is apparent that the factor was intended for purposes of upward reporting of grazing allotment use; and is absolutely NOT intended for calculation of AML (FSH 2209.15.10.29).

Also at 57, the Forest Service attempts to justify its restriction of annual wild horse forage requirements to 8 months, rather than 12. But, however confusing, the step-by-step AML determination process found in the BLM Wild Horse and Burro Management Handbook (H-4700-1), which the Forest Service claims to have followed, is relatively simple to apply. Clearly, the restriction of annual use by wild horses to 8 months instead of 12, as horses normally eat forage for the entire year, reduces the AML. As clearly, eliminating “moderate” use from the calculation reduces the AML. The creation of an “extreme” use category, which is not prescribed in the Handbook’s formula, reduces the AML at a third point in the calculation process. These were conscious choices, not simply mistakes within a complex equation. The result was the maintenance of the mid-point AML which has persisted from the Territory’s inception, with periodic, token, iterations giving the appearance of analysis.

With the present opportunity to consider fair and reasonable, genetically-sustainable AMLs and the addition of resources and space in the Middle Section, the Forest Service must shed the disingenuous AML evaluations of the past and strive toward a free-roaming, self-sustaining DGPWHT horse population consistent with the vision set forth in the Wild Free-Roaming Horses and Burros Act, and ethical management at all phases, which the public has every right to expect.

Instead, it appears the Forest Service not only affirms their ill-gotten 2013 AML, but ignores the aspect of the Court Order which virtually rendered the entire 2013 Territory Management Plan null and void at the time of the ruling, since the inclusion of the Middle Section in part or in whole demanded re-evaluation of AML and also changed the Territory boundary. Either factor would preclude the gather planned for this month. These substantive changes, effective on the Court’s decision, in combination with the time elapsed since 2013, should have terminated the “Settlement Agreement” and demanded the 2013 EA be vacated at that time.

Too, the Modoc National Forest frequently refers to Forest Service Manual direction which redefines “excess” to include any horse which steps outside the Territory. The reference cited (FSM 2265.3(2)), instead states “2. *Those animals determined to be "excess" to the maintenance of a natural ecological balance. The remaining number is that acceptable population range identified in the management plans.*” The Forest Service’s own direction does NOT state “Excess animals are those which resid[e] outside the territory or when removal from private property is requested by the private landowner.” (Responses at 48, etc.) If the Forest Service Manual had been revised to make this statement, it would conflict with the Wild Free-Roaming Horses and Burros Act. Additionally, when removing wild horses, from off-Territory or private lands, the Forest Service is only authorized to relocate them back to the Territory – unless the Herd as a whole has been determined to be overpopulated.

2265.2 - Removal of Animals at Landowner's Request:

“Upon request of a landowner, Forest Service personnel shall remove wild free-roaming horses and burros that have strayed from National Forest lands onto private lands. When fences on boundaries between private lands and National Forest do not exist or are not adequate, advise the landowners of their responsibilities, what the Forest Service position is, and come to an agreement about who will construct, improve, or maintain such fences.

“Adhere to applicable State laws governing movement of livestock when moving wild free-roaming horses and burros from private lands. Return all wild free-roaming horses and burros from private lands to their normal herd territories with minimum physical damage or stress to the animals.” (emphasis added)

As the Forest Service is aware, “excess” determination cannot be made simply on the basis of AML, but must be further supported by current wild horse inventories (§ 1333(b)(2); analysis proving an overpopulation exists, that action is necessary to remove excess animals, and that removal will restore a thriving natural ecological balance to the range (§ 1333(b)(2(iv))). Until details of the Court Order are revealed to counter these suppositions, we expect the Modoc National Forest to abide by settled law and this specific Court Order as it appears from the public’s perspective. Any gather, until a Final Decision relative to this action is made and is uncontested, would be unlawful.

Remedy:

The Forest Service must re-evaluate AML for the entire Territory, offering realistic Alternatives based on thorough, current analysis using objective, transparent, and scientific methodologies. The 2013 TMP should be considered null and void due to the absence of quality analysis, the age of the data, and the Court Order. The Settlement Agreement should be similarly terminated, also due to the quality and age of the data on which assumptions were based, but also because agencies cannot be compelled to violate the Wild Free-Roaming Horses and Burros Act, the National Environmental Policy Act, and the Administrative Procedure Act. The Forest Service must cease to manufacture Regulations such as the additional direction given to FSM 2265.3(2). The Forest Service must cancel gather plans scheduled for October 2024.

6. Freeze branding (as applicable to *adoption/sale*; not identification of individuals in the wild)

Responses to our concerns at both 36 and 53 are not only non-committal and unhelpful, they are disturbing. These 53 years following the passage of the Wild Free-Roaming Horses and Burro Act should have been adequate to instill in agencies that their paramount responsibility is to *protect* wild horses and burros which, prior to the Act, were in grave danger of further abuse and slaughter. Yet, the Forest Service – to the highest levels – refuses to perform this simple function which would appreciably reduce future instances of abuse and slaughter. According to its own direction, the Forest Service is required to brand horses placed in private custody:

2265.51 - Identification of Animals Placed in Private Custody

“All animals placed in private custody must receive a number for identification purposes. Use the Alpha Angle marking and numbering system where sizable numbers are processed or where animals are processed in cooperation with the Bureau of Land Management. Use freeze brand methods to place markings under the mane on the left side of the neck.”

A microchip cannot substitute for a plainly-visible identifying mark which will alert law enforcement, criminals, and astute public that a wild horse, perhaps untitled, is trackable and protected. From the moment a wild horse leaves the Forest Service adoption facility, it is exponentially more vulnerable. At that point, the horse enters *our* world, where we frequently see neglect, ignorant or intentional abuse, and photos and films of horses inside the dark passageways leading to slaughter. Adopters sometimes contact us, wanting to follow titling procedures, because agencies provide no assistance; no oversight whatsoever. Certified compliance checkers, volunteers in Agency adoption programs, report no calls for compliance checks for many years, except from a few adopters themselves; when they receive no help from agencies. Pre-adoption facility checks are nonexistent. Hay is expensive and hard to find. Horse properties are expensive and hard to find. Life is hard. And horses are the first casualties, under the best of circumstances. The Adopter Incentive Program has accelerated the number of inappropriate or failed adoptions resulting in sale to slaughter buyers. Not one of the salivating, soul-less middlemen will possess a microchip reader.

Even if a microchip could serve as the ‘unique identifier’ it is only as effective as its supporting national Forest Service database. We are not aware of the development of a database – which would mirror the BLM network which tracks each horse or burro’s ID number; adopter information, title status, etc., so that adherence to adoption terms and welfare of the animal is, in theory, assured. The Forest Service could easily re-engage with BLM for this purpose, as all Forest Service wild horses and burros once received a freeze brand and were placed in the BLM database.

Freeze branding does not always prevent slaughter. Untold numbers of branded horses have met with this fate in Canada or Mexico. Every safety net has horse-sized holes, when human nature is unabated by raw compassion or well-crafted processes. But, eliminating the traditional outward sign of Federal protection will – unquestionably – vastly increase the number of Forest Service horses entangled in the well-integrated web of slaughter. And those horses will not be recognized as “wild” by those warriors prepared to rescue a few wild horses from the jaws of kill pens and their microchip reader-less operators.

It is incomprehensible why the Forest Service would make this choice; at any organizational level. The unmitigated disregard for wild horses and burros is becoming increasingly evident in both agencies’ recent actions, but is no more apparent than through this refusal to freeze brand and catalog captured horses and burros.

Remedy:

The Forest Service must begin freeze branding all captured horses intended for private care and maintenance; must develop a national database for tracking all such horses; and must increase oversight of adopted horses through a cadre of certified compliance checkers, to include appropriateness of facilities and transport equipment.

7. The Murchie Study (late survival/native status of horses in North America)

Within the public involvement framework, the interface between agencies and citizens is limited to actionable “points” where parties can differ or come to agreement. Underlying philosophical arguments are not encouraged. However, the Wild Free-Roaming Horses and Burros Act has endured 53 years of

attacks because detractors have demanded that the Act be more than a law representing the will of the American people. The horses and burros must continually prove their right to exist on contested public lands, against “multiple-use” misconstruction and false claims that horses and burros are “invasive species”. Indeed, every equine species originated in North America, and nowhere else. Growing evidence supports the premise that horses never left.

This is highly relevant here, because the positions held by the Central Oregon Wild Horse Coalition are predicated on the Horse as a native species, which contributed to the ecological wealth of pre-contact America and will play a pivotal role in the restoration of the natural environment, if allowed, as the prescient Wild Free-Roaming Horses and Burros Act imagined. The loss of genetic variability and identity is important for every single herd, since each herd’s DNA may yet contain undiscovered links to the native horses’ North American ancestors and to the wild horses’ place in a true ‘thriving natural ecological balance’ which depends on the genetic adaptations of each plant and animal species. The misguided use of GonaCon and even indiscriminate, repeated application of PZP, will ultimately compromise natural behaviors and reduce the Effective Population Size of every herd. Translocation will, even as Dr. Cothran admitted, homogenize wild herds over time. Failure to adhere to the ‘Principal Use’ concept will continue to obliterate the natural ecosystems dependent on and needed by wild horses and burros. Climate change will increase in scope and intensity as governments and those governed persist in denial and cultural protectionism; domestic cattle are non-native and major contributors to global warming, while horses are integral components of their *native* rangelands.

Responses, at 73, replies to a commenter’s reference to *Collapse of the mammoth-steppe in Central Yukon as revealed by ancient environmental DNA*, Murchie, T., et al. (2021) stating “This citing did not match the associated comment.” We are unsure as to which aspect of the study was cited or commented on, but the Central Oregon Wild Horse Coalition is quite familiar with the research. We were in attendance at the first video presentation of the study, where Dr. Hendrik Poinar and Dr. Ross MacPhee spoke with us as findings were revealed. The most illustrative text of the study is found on page 5 (Fig. 2), a graphic wherein the relative extent of species presence is depicted, for well-known extant mammalian species such as elk, bison, and wolf in addition to the Horse. As the timeline progresses toward the present era, each of these species appears to decline, due in part to the quality of DNA samples, and because the species may have left the area as the vegetation also changed significantly. In some instances, the species may have died out at that site, such as the Mammoth. We specifically asked Dr. Poinar if the spliced DNA was viable enough to provide ancestral relationship to living wild horses, and when he replied in the affirmative, we began collecting samples from horses most likely to represent the least-complicated lineages which may prove to be directly descended from the Yukon Horse. This research has yet to be completed. Dr. Poinar specifically stated that the timeline of date-able Horse DNA extended to about 4000 ybp.

We have been in contact with Dr. Wade E. Miller, who recently published a study on dated horse bones found in Central Mexico. As with every other paleontologist bold enough to suggest that horses may have survived to the present era, he has encountered a great deal of opposition and skepticism. But Dr. Miller and his fellow researchers (including Dr. Jim Mead, Director of Research, The Mammoth Site) are confident in the continuum of Horse evidence dating from tens of thousands of years ago to approximately 1000 years ago. While there is some question as to the exact species of Horse within this site, Dr. Jay F. Kirkpatrick maintained that every horse for the last million or so years is definitely *Equus caballus* (modern horse) and horses deviating from that standard should be considered as “breeds” of horse; just as we currently have a broad spectrum of ponies and horses within *Equus caballus*.

We are also in possession of accession records from 2004, from Illinois State Museum, which show Horse bones found primarily in Northwestern/Rocky Mtn. Region sites, which span the Holocene period.

The wild horses which agencies consider “descendants of modern breeds” need a closer and more reverent look, and must not be diluted or eliminated through careless management. Dr. E. Gus Cothran’s most recent research is a fresh reminder of what will be irretrievably lost as agencies persist in their disregard for the horses’ histories and rightful niche in their environment. The Devil’s Garden Plateau horses deserve, and are required by statute to receive, much greater consideration and intelligent preservation than is identified in the proposed action.

Remedy:

The Forest Service must reconsider wild horses as a native species, and must enable herds to function as native wildlife; for the benefit of the horses and a thriving natural ecological balance as prescribed in the Wild Free-Roaming Horses and Burros Act.

8. Statutory Violations

An EIS should be prepared. The “Significance” factors listed in 40 CFR § 1508.27 (Old Rule) are categorized according to “context” and “intensity”. The agencies’ proposed action violates both.

(a) Context.

The actions proposed by the Forest Service will affect the human environment far beyond the site-specific DGPWHT. Livestock interests have held tightly to their grip over the Modoc National Forest’s Wild Horse program, ensuring the continued grazing of livestock at approximately-current levels. In turn, this violates statutory requirements to reduce greenhouse gas emissions and will add to the global threat.

(b) Intensity.

(2) The degree to which the proposed action affects public health or safety.

For the above-mentioned livestock-related reasons, this action would adversely affect public health and safety; increasing drought and wildfire, and affecting the human environment in increasingly dramatic ways. Failure to address actual causes of climate change while assigning blame to a species which can sequester carbon will have compounding effects.

(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

- The Forest Service’s proposed use of population control methods such as GonaCon are controversial, as research to date fails to assure safety of the subject horses or to fully analyze long-term sterilization effects. (effects are also argued even among experts, such as Dr. Baker and Dr. Griffin) in violation of the WFRHBA.

- Translocation of outside stock into the DGPWHT in order to manage genetic diversity is controversial. Experts disagree as to the use of this extreme action since there are other existing means of main-

taining diversity. (Even experts promoting the action assert that it simply does not work: American Wild Horse Conservation filed this Comment to the 2020 Environmental Assessment, Ochoco Wild Horse Herd Management Plan and Forest Plan Amendment; “Dr. Gus Cothran has personally informed AWHC that once genetic viability is low, it takes generations to correct and that adding a few horses does not prevent inbreeding in small herds.”)

- Effective Population Size, critical to maintenance of wild horse herd health, is controversial. Experts disagree regarding the appropriate minimum population level which facilitates sufficient random breeding, and whether importation of outside DNA obviates the need for EPS.

(5) The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

- Since the use of GonaCon as a population control method is not sufficiently researched in terms of risk of permanent sterilization or long-term health of treated wild mares, the highly uncertain risks are significant.

- The unscientific approach to determination of AML, combined with the number of small subpopulations numbering far below EPS, imposes the risk of irretrievable and perhaps existential harm to the DGPWHT Herd. The genetic composition (identity) of the DGPWHT herd is virtually unknown, increasing the risk of irreparable harm.

- The Forest Service has not adequately considered the effects of failure to freeze brand captured horses, as those horses remain protected under the Wild Free-Roaming Horses and Burros Act until titled to the adopter. Similarly, promissory notes in the instance of Sales Authority horses do not provide adequate protection, but the Forest Service has not developed a system to hold buyers responsible for harm. The Forest Service has not addressed whether they will employ the BLM’s “Adoption Incentive Program”, which is known to increase numbers of wild horses being sold to slaughter buyers. The action places the resource of wild horses at significant risk; unique to wild horse and burro management and especially to the DGPWHT herd due to local sentiments and alliances.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

- The reluctance to significantly reduce livestock production in the DGPWHT will contribute to the global accumulation of greenhouse gas.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

- The proposed action violates the Wild Free-Roaming Horses and Burros Act and the National Environmental Policy Act.

In particular, the absence of a comprehensive genetic management plan imposes a long-term risk to the DGPWHT herd. The use of GonaCon also places DGPWHT horses at risk. These actions threaten the Wild Free-Roaming Horses and Burros Act in the context of Agency mandate to protect wild horses. The failure of the Forest Service to follow steps set forth in the Wild Free-Roaming Horses and Burros Act to identify and manage “overpopulations” violates the Act.

The Forest Service’s failure to take a “hard look” at current environmental conditions in relation to the number of wild horses, livestock, and wildlife violates NEPA. Failure to identify and mitigate risks to wild horses through fertility control treatment using GonaCon violates NEPA. Failure to properly assign causal status to ruminant grazing species, and in turn, to reduce greenhouse gas emissions also violates NEPA.

Remedy:

The Forest Service must take greater care to assure all statutes are followed in the course of developing and implementing this proposed action.

The Central Oregon Wild Horse Coalition, along with the Oregon Wild Horse Organization, appreciates this opportunity to express our concerns about the Devil’s Garden Plateau wild horse herd and their future within their home range; the Modoc National Forest. We look forward to constructive dialog going forward.

Respectfully,

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