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I submit these comments in opposition to the USFS's draft environmental assessment for the Ochoco Wild Horse Management Plan in the Big Summit Wild Horse Territory (BSWHT).

The three alternatives presented in this EA are all acutely inadequate and must be scrapped and completely redrawn. This EA fails to properly analyze the potential environmental impacts of the various planned approaches, including skewed sex ratios, sterilization procedures, non-reproducing herds, wildfire mitigation, etc. The Forest Service has violated NEPA in that it has only considered limited alternatives in the EA and has not completed an EIS in advance. You have set yourself up for litigation and failure. There are many factors that must be considered, and many misrepresentations in the EA that must be reconciled.

As you already know, by way of the 2013 NAS report, there is no science-based evidence to support AML figures, especially in a herd of this size and consistency in numbers. There is not yet research, called for by the GAO, to evaluate and separate domestic livestock and wildlife impacts from the impacts of wild horses. The proposed AML of 12-57 is a planned annihilation for this herd, and will be seen for exactly that. The AML for this herd must be raised to at least 150 which would allow genetic viability without the need to introduce horses from another area.

The idea of removing horses and then bringing in more horses from another area is both an exercise of futility and nonsensical. There is no need to introduce other horses for genetic viability if the herd size is at least 150, as referenced by equine geneticist Gus Cothran, and widely accepted. This EA reference to the horses being part of the metapopulation of all wild horses is taking a piece of the NAS report out of context and completely changing the meaning of that reference. It does NOT apply to this herd as the Big Summit horses have genetic uniqueness.

By removing horses from this herd, you are contributing to exacerbating high population growth rates in the herd through compensatory reproduction which has been scientifically documented by the NAS and NRC. There is no need to remove horses due to the fact that the Big Summit herd has remained relatively stable at 130 for many years. This is in part due to the extreme weather conditions found in the area, including severely harsh winters.

The Forest Service based its plans on flawed data that only considers 4,900 acres, which constitutes the horses' winter range, instead of the 25,434 total acres of their territory. The Service also utilized a ridiculous 30% riparian zone calculation to account for transitional areas between dry land and bodies of water, despite only 4% of the winter range actually designated as "riparian."

Not only is the resource data flawed for the above reasons, it completely omits and ignores the damage done, especially to the riparian areas and streams, by over 100 years of livestock grazing and logging. More recently, camping areas near water sources have shown complete denuding by human presence alone, including ATV use, which must be addressed in your "multiple use" mandates and regulated with signage and monitoring. This blaming and scapegoating of wild horses for damage caused by other factors must stop. It is WRONG.

Sterilization should never be the preferred form of population control, and surgical sterilization must never be used. The public, for whom you manage these public lands, will never stand for it. PZP fertility control has been proven safe, effective, and reversible for decades, with numerous scientific peer-reviewed studies to support it. The Forest Service should avail itself on the experts in this field and the volunteers who stand ready and able to help institute a PZP fertility control remote darting program with the documentation software necessary. That, of course, would be on an "as needed" basis if the population would start to grow - which it hasn't for many years.

Ultimately this EA highlights the need for an EIS because it is clear that the Forest Service has not analyzed all reasonable alternatives, such as those proposed here in this comment letter, pursuant to NEPA.

Thank you for considering my comments, and please keep me on the stakeholder list for notifications on this EA and other documents regarding the Big Summit Herd.

Ginger Fedak

Wild Horse and Burro Campaign Director

In Defense of Animals