Data Submitted (UTC 11): 4/10/2024 10:42:47 PM
First name: Christina
Last name: Anthes
Organization:
Title:
Comments: Re: Appropriate Management Level Evaluation for the Middle Section of Devil's Garden Plateau Wild Horse Territory, 2/25/2024 Report
Dear USFS personnel,
My name is Christina Anthes and I'm a resident of Adin, CA. I'd like to comment on the above evaluation and proposals, if I may.
First, I'd like to compliment your agency for such a complete report; it put to shame other government reports I've reviewed. I appreciated the references, pictures, maps, graphs, as well as what looks to be responsibly collected data.
One thing I'd like to suggest is that the report be peer reviewed by 2 outside entities such as a university or other institution that is not receiving subsidies from the government and is not the Farm Bureau. The peer review of least 2 other outside institutions would improve the report's validity.
Proposed Action:
1.I agree with the proposal to include additional acreage referred to as "the middle section". In 2013, the plan eliminated 25,000 acres of prime grazeland for this group of wild horses. That plan was driven by livestock interests and the USFS hired the Farm Bureau to conduct the environmental analysis of the plan. The 2024 plan, once again, did not include the study of the impact of privately-owned cows and sheep who graze in the Devil's Garden and outnumber wild horses by as much as eight times. Someday, I'd like to see that analysis. Indeed, the new plan depicts that the AUMs for permitted use in the middle section were above 12,000 and maximum allocated Wild Horse use was just above 2,000.

2.I was unable to locate the terms and conditions for the 2021 Settlement agreement, as details of that report were not included in this plan, nor was it included in the set of attached documentation. This revision is very vague and lacking detail as to what "additional management actions" entail, and the report also omitted what is the recent federal law regarding treatment, removal, adoption or sale of federally protected wild horses. Please include that information.

3.I agree with applied fertility control and studies of efficacy of varieties of vaccines over the years as one will emerge as the most effective over time. Please keep applying fertility control as $50/application is quite a bit cheaper than the millions of tax dollars we pay to fund livestock removal companies. It has come to my attention through various sources that some roundup companies are profiting significantly from these operations. These companies often charge exorbitant fees for their services, with little transparency or accountability regarding how taxpayer funds are allocated. Reports and investigations have revealed instances of financial irregularities, conflicts of interest, and unethical practices within the wild horse management industry. It is unacceptable that taxpayer dollars are being used to subsidize the exploitation and mistreatment of wild horses for the financial gain of private companies. Instead of perpetuating this cycle of abuse, I urge the USFS to explore alternative management strategies that prioritize the humane treatment and preservation of wild horse populations in their natural habitats. I would like to see a report outlining tax payers' expenses for these round ups.
4.I would like a report that depicts how many horses the USFS currently possesses in confinement, what the process is for adopting the animals out, what happens to animals that are not adopted, and how many horses are transported to slaughter. Each animal in confinement should be rated on the Henneke Scoring Chart.
On March 25, the Bureau of Land Management (BLM) released its 2024 wild horse and burro population census numbers, estimating that 73,520 wild horses and burros remain free in the wild compared to the estimated 82,883 last year. Using these numbers, the BLM is doubling down on its mass roundup plans, targeting 20,000 wild horses and burros for capture and removal from the wild this year. The agency's ultimate goal is to drive the population down to fewer than 27,000 animals - the number that existed in 1971 when Congress protected them unanimously because they were "fast disappearing." Over the past three years, the BLM has spent $401 million

rounding up 50,000 wild horses and burros, with the captive population now exceeding 64,000 and set to rise to over 80,000 this year -meaning that, for the first time in history, the number of wild horses in confinement will exceed the number that remain free on the range!
In conclusion, I will always agree with expanding the Devil's Garden Wild Horse Territory, reducing private cattle ranging on the territory (mind, these horses are public domain and they are living on public lands), utilizing fertility control in order to reduce future round-ups, more accountability for tax payers dollars paid to livestock round up companies, reports depicting horses currently in confinement and their current health status, procedures for adoption, and accountability for horses transported to slaughter. Additionally, please perform roundups when the foals are at least 4 months old and take good care to not separate mares from their foals. They are sentient beings and they love their offspring.
The USFS should be showcasing these horses, making them part of an education and recreation program for school children and visitors to our area.

Thank you for considering my concerns,
Sincerely,

Christina Anthes
Adin, CA - Modoc county