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Organization:

Title:

Comments: I urge a moratorium on any roundup of native species American wild horses in and around Heber, AZ. This proposed moratorium should be affected immediately and continue in full-effect at least or until additional new research can be examined, and the value they provide as; 1) keystone herbivores in our failing ecosystems; and, 2) value to taxpayers as wildfire fuel reducers.

I am presently engaged in that research.

My name is William E. Simpson II. I spent my formative years on my family's working ranch in southern Oregon as a rancher managing lands with forest and with horses and cattle, as a member of the Future Farmers of America.

After a long career with numerous professional vocations, I am now retired, and living on my ranch in the Soda Mountain wilderness area (OR-CA border) among the free-roaming wild horses that I have studied for the past 7-years.

The combination of my training in science, background in business, logging, livestock production and forest/land management (including firefighting), and wild horses have informed my perspective in a unique and synergistic manner.

The first 5-years of my ongoing and continuous Study ('Impact Of Wild Horses On Wilderness Landscape And Wildfire') of wild horses has been condensed and published at GrazeLIFE (a division of Re-Wilding Europe):

<https://grazelife.com/blog/wild-horse-fire-brigade-lessons-in-rebalancing-north-american-ecosystems-by-rewilding-equids>.

My study is unique in that my wilderness Study site is virtually devoid of livestock (too remote and too many apex predators); there are only cervids and equids.

My experience, is both academic in regard to my background in science (attended Oregon State University as a Pre-Med Science major), and empirical, in regard to the behavioral ecology of wild horses and their management.

As you must know, the recent and ongoing roundups by the BLM and USFS are devastating to the wild horses, as well as to the ecosystems where they are found.

During roundups, wild horses (and burros) are driven beyond their physical abilities, in many cases, some are dying from stress during or after the roundups. Foals literally run their hooves off, and some can't keep up and are lost, left behind for predators. Pregnant mares abort their unborn, some die from shock out on the range, some of these atrocities are concealed from the public.

Some atrocities are not, such as this BLM contractor helicopter ramming a fleeing burro, and a BLM contractor beating and punching a helpless little burro (he was never prosecuted); VIDEO EVIDENCE:

<https://www.youtube.com/watch?v=9zVUHwkPwW4>

Ecosystems (flora and fauna) are devastated in wild horse roundups:

Roundups that use helicopters and other vehicles, force wild horses to flee for their lives randomly (abnormal behavioral response to motorized roundups) across the landscape, and in the process of their desperately fleeing, they inadvertently trample threatened and endangered species of flora and fauna.

Caused by the BLM & USFS roundups; the trampling-damage affects the nests, crushing eggs of ground birds (sage grouse) and the birds themselves, as well as numerous small mammals and reptiles (lizards, turtles, snakes, etc.), which are all crushed by the thundering hooves of escaping wild horses and other wildlife, all of which are running for their lives as helicopters disrupt the normal tranquility of the ecosystems subjected to what could be called a monetary-biased War on Nature.

These wide-scale roundups are coupled with the systematic implementation of a combination of diabolical methods that are arguably designed to lead to genetic erosion and loss of genetic diversity, leading to the ultimate extinction of free-roaming native species American wild horses...

The draconian methods currently being used by the BLM, USFS and their cronies, include these;

- 1) Reducing breeding populations so low (less than 200 breeding adults in a herd) as to induce in-breeding and loss of genetic vigor; and,
- 2) Castration of stallions, which results in the loss of genetic diversity (we don't even know which alleles are responsible for the resistance that wild horses have to Chronic Wasting Disease), and this also interferes with evolved evolutionary competition for breeding rights (survival of the fittest); and,
- 3) Chemical interventions (PZP & GonaCon) which interrupt critical social structures in family bands (matriarch mares lose status and their intuitive knowledge for survival is lost to family bands; some mares become infertile, etc. Darting wild horses with chemical contraceptives, as some of wild horse organizations lobbying legislators want to do, is not ecologically correct and it disintermediates evolutionary processes.
- 4) Wild horses are being shot to death by people now embolden by what seems to be an 'open season' on wild horses by the BLM and USFS, resulting from what the public sees as a total disregard for the value of these sentient beings by these government agencies.
- 5) The BLM even has the audacity to propose using an outdated procedure known as "ovariectomy via colpotomy," where a metal rod-like tool is blindly inserted through a vaginal incision in order to sever and remove the ovaries of wild mares while they remain conscious!

The government agencies (DOI, BLM, USDA, USFS) which are arguably influenced by money and politics around public land livestock grazing, are devastating the remaining populations of the relatively few (based on genetic diversity) remaining American wild horses....

The BLM is still engaged in an ongoing campaign of 'willful ignorance' and 'campaign of misinformation' via their ongoing propagation of manifestly false statements, including but not limited to:

"Wild horses have no natural predators..." IS a false statement promoted by the BLM (and now widely repeated).

This false and misleading statement appears on Page 1, Executive Summary, paragraph 5 in the so-called management plan presented to Congress; 'Report To Congress - Management Options For A Sustainable Wild Horse And Burro Program'.

Only a corrupted agency would manage a wildlife resource with a fabrication as the core premise for radical

arbitrary population reductions.

It's a well-known scientific and common-knowledge fact that: All north American apex predators (mountain lions, bears, wolves and coyotes) are the evolved natural predators of wild horses and burros.

We need to restore ecological-balance and the trophic cascades in areas where that is still possible in the remaining remote wilderness areas, where the American wild horse is a critical keystone-species large-herbivore, as is the case in many ecosystems.

The BLM is already paying ranchers more than \$100-million annually to house wild horses off-range is a serious waste of our tax dollars (it's obscene; one ranching family alone, the Drummond family, has already been paid \$24-million by the BLM!).

This waste of tax dollars is totally unnecessary when there exists a readily available, virtually cost-free path for solving the entirety of the wild horse dilemma, while concurrently reducing wildfire fuels; a concept supported by peer-reviewed, published science.

Treating wild horses (deemed as 'native species' & 'wildlife' by the 9th Circuit Court of Appeals) with any chemicals is wrong on so many levels it's just obtuse, and there are numerous experts who agree with this position.

The Natural Path To Successful Wild Horse Management

Relocating wild horses from holding (thus initiating immediate reductions in expenditures for offsite holding), and also, relocating wild horses from areas where they are in conflict with livestock interests (subject to potential BLM-USFS interventions) via humane relocation methods [unmolested family bands are baited-in and relocated together as family bands], into select wilderness areas with abundant water and forage, that are nevertheless manifestly unsuited for livestock wildfire grazing (for many sound reasons; I.E. loss of profits due to; predators, management logistics in rugged remote terrain, etc.) is both economically and ecologically appropriate.

A new article was out (Friday, Jan 5th) in Colorado at the Pagosa Daily Post, detailing how American taxpayers and Counties in Colorado can save (literally) hundreds of \$-millions annually by implementing new public lands management using Wild Horses.

<https://pagosadaily.com/2021/02/05/opinion-the-dollars-and-cents-of-americas-wild-horses/>

This older article details why, exactly, wild horses are appropriate ecologically on the American wilderness landscape: <https://pagosadaily.com/2021/01/18/opinion-wild-horses-chronic-wasting-disease-in-deer/>

And finally, this article that appeared in the Mail Tribune and the Pagosa Daily Post, outlines the common-sense solution that all stakeholders should consider in contrast to the ongoing dire situation:

<https://pagosadaily.com/2020/12/14/opinion-wild-horses-in-america-hard-truths-sensible-solutions/>

I can only hope that there are enough enlightened people in the mix to implement a final solution that is fair and just to these magnificent, highly evolved, sentient beings.....

So far, in our short stead on the planet, we've done a fine job of wrecking almost everything we mess with... especially things in the Natural world. Maybe we proceed with that thought to guide us as we evaluate our next plan to save wild horses....

*Scientific References available on request.

Respectfully Yours,

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