

Regarding the Ochoco Wild Horse Herd Management Plan EA

Note the USFS failed to respond to my comments submitted in a timely manner in May 2020. With no consideration given, I am unable to shape my objections in the most productive and accepted manner. In absence of consideration, I am including a copy of my original comments and submitting some newer comments regarding objections I have regarding the current draft. I would appreciate confirmation of receipt with a response.

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Original Comment Letter, May 18, 2020:

Slater,

The Preferred Alternative flies in the face of long standing science, creates unnecessary and extensive expense for the taxpayer, and shows utter disrespect for those community members who have helped our federal agency manage these horses for decades. This is beyond disappointing.

Whereas aiming for 12 to 57 AML is so far under genetic viability for any ungulate population, choosing Alternative 2 is by far the most expensive and most labor-intensive choice the USFS can make.

Alternative 2 will cause either extirpation of this genetically unique group of horses in a matter of a few years or cause a great hassle that can fairly be called Horse Farming by the federal government. With population numbers so low, the Ochoco National Forest will need to manage the horse population tighter than ever, requiring far more labor and resources than ever needed before.

Management needed to keep a population of 12 to 57 present will include shipping horses to and from other wild horse territories. This is an asinine move that cannot even be called a plan. This will destroy the local horses' ability to survive winters and other challenging situations as the wisdom of the herd will be lacking within just a couple years.

Choosing Alternative 2 shows a blatant disregard for the decades of input the central Oregon community has provided the Ochoco National Forest.

Choosing Alternative 2 proves that all the public meetings and all the series of meetings presented as 'sounding boards', 'partnerships', and 'public input' were merely a front; a decoy while the Ochoco National Forest continued on its determined path to destroy this group of horses.

The Ochoco National Forest has repeatedly failed to use offered local professional resources, preferring instead to attempt to handle issues themselves at great taxpayer expense and a near total lack of competence.

For more than 20 years, the Wild Horse Census has been performed by dozens of northwest volunteers and has made the Big Summit horses one of the most monitored herds in the United States. I helped run the census for 15 years and I can tell you that we took a lot of pride in presenting the very most accurate numbers possible. Yet it appears the Ochoco National Forest doesn't seem to believe the numbers presented.

Former District Rangers Art Currier and Bill McQueen stayed involved and responsive to the public when we had issues involving the wild horses. I personally have enjoyed many conversations with Art and Bill through the years. Recently, I have felt that the public is not being heard. For at least three years, I've

noticed a distinct unwillingness by the Big Summit Ranger District to be part of a collaborative effort. Having been involved since the mid 90s, I find this trend disheartening at the very least.

The census shows the Big Summit horses have reached homeostasis. They have reached a balance that needs very little influence from forest management. Yet the Ochoco National Forest claims the herd is growing. I remind you that the Coalition requested permission to search for and count horses north of Road 22 during the census for years. We were denied repeatedly with a simple statement “there are no horses north of the 22”. In 2011 when we were finally allowed to look for horses north of the 22, we found four new horses in the first half hour. This scenario has repeated itself. The herd is not growing – we are searching more areas. I remind you also of the elderly horse found injured in a cattle guard north of Road 22 in 2011 or 2012. Turned out that horse was a branded Big Summit mustang, captured and gelded as a youngster, and lived for a quarter century undetected north of Road 22. The herd is not growing. At most, its individuals are moving around to avoid pressure throughout the forest. A homeostatic population is the easiest to manage. We should be studying this herd, not destroying it.

We have been told repeatedly that there are no horses east of Big Summit Prairie. Yet I’ve seen them. Multiple times. I began seeing them there shortly after moving here in the 90s. This is not new.

The Big Summit horses are barely clinging to the bottom of genetic viability already. Yet they continue to thrive without resource damage. Choosing Alternative 3 would be the least expensive, most effective choice. The horses already tend to limit themselves to around 130 horses. Should the population grow a little, gathering a few horses every few years will be significantly less expensive than the work it would take to manage them at 12 to 57 individuals with all the planning, trapping, treating, and transporting necessary to maintain the population at such low levels.

I need to be very clear for you here: Managing the horses near a population of 130 which the horses themselves have proven is sustainable is FAR CHEAPER than attempting to manage the same horses at a level below sustainability of 12 to 57. Imagine the amazing feeling you'll experience when you've accomplished this impressive balance - effective management at a low cost!

These horses are a tiny population whose excess can be easily absorbed by the community in small quantities over time. Large numbers removed all at once cannot be absorbed by the community. The goodwill generated in central Oregon by allowing the current number of horses to remain in the forest will be a legacy for generations. The extinction of what we now know as the Big Summit horse will be a mountain of shame insurmountable for decades.

I’ve noted that several within the Ochoco National Forest claim that the Big Summit horses are not attractive enough for adoption. Firstly, this is an opinion that should not hold any more weight than its opposite. Secondly, adoption value should not be a primary value when calculating how to manage animals remaining in a population. Thirdly, I personally have multiple Ochoco horses that have proven to the highest levels that Big Summit horses can perform. Three of those horses were used on contract with Ochoco National Forest last October packing fuel for a prescribed fire. I've included some photos of my Big Summit horses working to benefit our larger community.

I have offered to be helpful many many times. In the last few years, Ochoco National Forest has begun to refuse help in regards to the wild horses. It has been painful to watch the Big Summit Ranger District struggle to develop a skill set in house to manage the horses all while professional assistance remains available in the community.

Alternative 2 is detrimental to the horses as valued in the 1971 Congressional Act, is vastly more expensive than other alternatives, and destroys any faith the central Oregon community has in the ability of Ochoco National Forest to manage our public land.

Alternative 3 is the most effective at following the intent of the 1971 Congressional Act, is the least expensive alternative, and will generate the most goodwill in our community.

I implore you to choose Alternative Three.

I am, as always, still available should you desire to reach out.

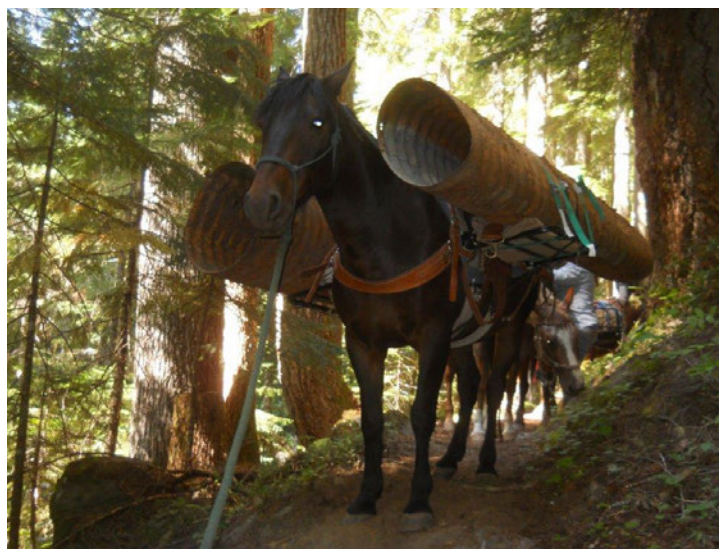
Safe Trails,

Kate Beardsley

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[REDACTED]

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(The above is a copy of my original comments submitted in May 2020.)

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While I am told my comments in May 2020 were properly delivered and were received by “Tori and Gibson” (Beth Peer), I did not receive any response from any USFS personnel, nor is my name listed as a commenter. I cannot, in fact, detect any consideration by the USFS of my comments. There is not a public lands topic more important to me than this one and my ability to influence this process has been grossly diminished. How disappointing this process has been – it leaves me knowing that the ONF has demonstrated no interest in science or scientific study or in actually following the law or its intent. I have banged my head on this wall for 22 years. I’d like to stop, but I know that left to its own devices, the ONF will indeed lose this herd of protected-in-name-only animals in a few short years.

Mistakes may happen, but this does not appear to be one. From my perspective, a lack of response in any form to my substantive comments is a blatant disrespect for the legitimate and professional expertise I have offered the ONF since the late 1990s. I attended many public meetings, planning meetings, sounding boards through the years, hoping beyond hope I could help ONF grow some good options for improving wild horse management in the Big Summit Territory. I now believe that all the meetings, and the processes presented by the ONF were simply a front to allow the public to feel they were part of a process. I see no evidence that the ONF ever considered any points brought to them by the public. This is how I am left feeling after decades of commitment as a team player.

The nature of my involvement has been more than meeting attendance. Some examples of my involvement follow.

- I captured and removed a stallion in 2012 at the request of Slater Turner in the absence of ONF in-house skill sets. I cared for this stallion until ONF managed to confirm its status as a member of the Big Summit horse population and I located an adopter. All that I offered and agreed to do was at my expense, costing ONF next to nothing for active, thoughtful, safe management practices.
- I quietly and safely removed a portable fencing panel from around a wild stallion's neck in July 2016 without touching the animal and while minimizing horse/human interaction and safety issues. This was an emergent situation though I called Slater Turner as soon as I could get to cell reception during the busy evening. Days later, I got a phone call (from Tori) expressing how upsetting it was that I never told the ONF what happened. I had the uncomfortable experience of suggesting that Slater check his voicemail.
- In 2018, I watched over a young stallion in a USFS portable corral in the center of our area for a multi-day permitted event. There were four expert wild horse handlers in our camp and I offered for us to load the horse and deliver him to wherever the ONF wished he'd go. This would have been a very simple operation. Our offer was turned down and days later the ONF brought in its own team. To be frank, the effort was botched, the lack of expertise was obvious, and a newly assembled team eventually managed to load the animal later after considerable expense. To watch ONF struggle to build in-house skills while turning down quality professional assistance is downright painful. It is interesting to note that while my skilled crew observed the loading process quietly, they were moved to a restricted area with the First Amendment being cited. Is this how the USFS wants to view its partners and local professionals? As problem citizens deserving of restriction and to be cast aside as useless?

I have listed some objections here, despite receiving no consideration from the USFS. This list is not complete; it merely hits on some important topics. I believe it best to keep communication lines open to ensure a productive outcome. I enjoy a seat at the table.

I object to the way the three alternatives were presented. I specifically object to how Alternative 3 has been presented in the EA. It is obviously placed in the document as a less desirable option, an option only given because some members of the public wanted it, a bone thrown to an annoying but ever-present dog. The USFS failed on this one. I contend there should be yet another alternative offered that more closely resembled science-based and actually attainable goals.

I object to the timing and scope of the ONF's release of the Draft EA and the ensuing objection period. It has been very difficult to communicate during this pandemic. In my efforts to help develop best

practices, I have not been able to reach USFS personnel as truly needed. I respectfully request that the USFS makes possible the ability of the public to adequately deliver substantive comments and truly be part of the effort to develop something better than what we already have (Alternative 2 is not better than what we have). Considering that the fact that the ONF did not respond to me in any way after I submitted comments may indeed be indicative of the difficulty of this process during the pandemic, I would like to believe that the ONF would want the ability to converse with professional and educated members of the public. The ONF is proposing massive and permanent changes to this population and arguably did not allow enough public input in the middle of our current pandemic.

“Cothran explained that the Ho values suggest that the herd has serious variability reduction and that more information is needed before specific management actions can be recommended.” (Ochoco Wild Horse Herd Management Plan EA, Page 33, Genetic Health)

I object to this plan to reduce population numbers to unquestionably below genetic viability even in opposition to what the USFS's chosen genetic expert's advice. I remember a conversation with Dr Gus Cothran way back in 2010 when we had a census of 78 horses. 78 is such an undeniably low number in any ungulate population, I was concerned for the overall health of the Big Summit horses. I asked him to ‘tell it to me straight – is it too late for the Ochoco horses?’ Dr Cothran's response was clear and quick – “No, but you cannot lose one more.” The next day, the Ochoco National Forest removed 12 horses. This clearly demonstrates that the ONF is not following any sort of thoughtfully planned management.

Commonly accepted population required to maintain genetic viability is 150 breeding individuals. Yet by some miracle, the Big Summit horses have demonstrated a trend of homeostasis at about 130. What a gift to managers! Yet the ONF desires to reduce this population to around 50 individuals – lower than the current AML – and thereby commit to large amounts of management expense trucking in animals to somehow increase genetic variability enough to keep a population alive and in place. When this effort fails, the Big Summit population can easily be zeroed out due to failing genetics. Alternative 2 increases the speed at which the wild horse population will experience genetic decline, costs the taxpayer far more money in expensive management practices, and causes the most harm to existing populations. I am an ecologist and I cannot comprehend why the ONF is choosing to reduce the numbers of an already genetically compromised population so that it is required to go through the hassle and expense of supplementing those genetics in the years to come. Using the guise of resource damage/forage availability, the ONF has provided NO long term studies of such theoretical resource damage. I have had boots on the ground for more than 20 years in the Territory and the ONF simply does not have any science to back up these claims.

“Permitted sheep use was voluntarily decreased because of a lack of forage (see Range Resource Report) from 2017-2019.” (Ochoco Wild Horse Herd Management Plan EA, Page 60, Cumulative Effects)

Let's go back to the genesis of the Wild Horse Census when I participated for the first time in the Wild Horse Census event. I had my two nine-year-old nieces with me and we spent three days in the month of June carefully and thoughtfully exploring our entire designated search area. On our first day, we crested a hill to see a very broad expansive view: the entire hillside below us as far down as we could see was laid bare. Unlike behind us where we had already traveled through a healthy landscape, in front

of us grew no grass. It looked hot and dry and was certainly dusty – the soil was devoid of anything smaller than moderate shrubs. In the bare dirt were thousands of tracks. I said to the girls “It looks like a goat pen.” We stood there confused and disoriented. Being new to the specific area, I knew nothing of livestock possibly present. I could not figure out what would make deer concentrate like that – enough to utterly and thoroughly trash an entire landscape - and I could not explain away the desolate carnage in front of us for my nieces. Two days later at the event gathering, I learned there were sheep allotments in the Territory. Mystery solved. Unfortunately, more mysteries developed – why would sheep still be allowed when the sheep herder is allowing or causing the livestock to do this much widespread destruction? With resource damage THIS blatant, why wasn’t the USFS taking action? More than two decades later, I still have questions. This amount of avoidable degradation is not acceptable. With the stated concern over winter forage, better livestock management is necessary. Reducing the number of wild horses certainly won’t address this long-standing problem.

“Alternative 2 is the only Alternative that is expected to improve the genetic variation of the herd, this Alternative allows the use of translocation as a tool to increase observed heterozygosity of the herd. Finally, population growth control measures and their associated effects vary by Alternative.” (Ochoco Wild Horse Herd Management Plan EA, Page 67, Summary of Effects)

I object to this concept that genetic variability trumps genetic viability. With this Alternative, the USFS spends a large amount of resources essentially farming horses by translocating unrelated animals into an artificially low population of genetically unique animals, therefore breeding a different animal all together. This is not the protection required by the 1971 Congressional Act. It is simply federal horse farming at the taxpayers' expense.

I value the Big Summit horses as they currently are. Please realize that I care for 7 Big Summit horses and I have extensively handled more than 20. The thought that Big Summit horses are not their own genetically unique population is dumbfounding. The phenotype of the Big Summit horses is distinct. Oddly, the two mares translocated into Big Summit already were both from South Steens, a herd known for bright pinto coloring and much larger size than that of Big Summit. Please note the large phenotypical differences in my photos of my Big Summit horses as compared to the South Steens horses present on my property. Just in this small adopted population, the distinction between those populations is beyond obvious. The Big Summit horses are unquestionably different from other populations and translocating as part of managing an artificially low population will change the genetics irreversibly.

Big Summit horses:



All the Big Summit horses pictured are between 14 and 14.3 hands tall. They tend to be small and stocky build, plainly colored, and generally of a quieter demeanor.

South Steens horses:



All the South Steens horses pictured are between 14.3 and 16 hands, are of typical loud pinto coloring, and have a tendency for a higher energy.

It might be of interest to note that this stunning black and white mare from the South Steens came into my care after being neglected for 10 years. A beautiful specimen from what is deemed the most desirable HMA managed strongly for adoptability still experienced an adoption failure. Wild Horse Management faces many challenges – not all are based in the Territory.



As a testament to the workable demeanor and proven value of the present day Big Summit horses, I offer a few photos of my horses at work below.



I object to the claim in the EA that *"Horses originated in the project area around the 1920s according to the existing Herd Management (Territorial) Plan (USDA Forest Service, 1975a)*. I have read USFS newsletters from the first three decades of the 1900s. These USFS newsletters include many accounts of thousands upon thousands of horses present throughout the forest, making it obvious that horses were present in large numbers long before the 1920s. By the USFS own information, the EA is inaccurate.

"Horses outside of the Territory need to be relocated back inside either by physical movement usually on horseback or foot or by trapping and hauling to an area inside the Territory." (Ochoco Wild Horse Herd Management Plan EA, Page 64 Forage Availability)

I object to this plan to rely on hauling horses around the Territory. Please note Steve Gibson's effort to relocate two bands of horses in 2010 by trailering them across the Territory. One band was seen back in its original location early the next morning; the other was seen returned by the following evening. This was a predictable failure. The USFS will do well to consider the cause of horses living out of the Territory, not just react to their presence outside the boundary.

I object STRONGLY to the depiction in *Figure 8 (Ochoco Wild Horse Herd Management Plan EA, Page 27)* showing a particular increase in population from 2011 onward. In 2011, the participants in the census run by the Central Oregon Wild Horse Coalition were finally – after years of requests – allowed to search for and count horses north of Road 22. As noted in my original comment letter (which I have no confirmation of receipt or comprehension), four additional wild horses were found in the first half hour north of Road 22 and more were found after that during the first census allowed in that area. While populations naturally ebb and flow, this Figure 8 completely fails to take into account a multitude of considerations for perceived population size and presents in a very oversimplified manner that population increase must be related to the cessation of captures (*"Last Capture"*). This is an example of the ONF once again making policy knowingly based on a distinct lack of historical data. It is clear to those of us that spend time in the Ochocos that horses have been living north of Road 22 for decades – they just didn't get counted in the census until 2011. Those silly horses just can't read the map. The ONF has NO SCIENCE behind its claim that the herd is growing in this particular manner in this timeframe.

Again, this list of objections cannot be complete due to the lack of consideration given me by the ONF. I request the ability to partake in this process fully and productively.

As always, I am available to help in whatever way that may provide actual assistance and may be called at [REDACTED]

Respectfully,

Kate Beardsley