

TO: [Debbie.anderson2@usda.gov](mailto:Debbie.anderson2@usda.gov)  
FROM: [REDACTED]  
RE: Comments and objections to Ochoco WH Mgmt. Plan 46228  
DATE: January 4, 2021

OBJECTIONS:

- 1) Counting numbers of horses yearly over a 6-7 year period shows numbers up, then down, then up averaging 135 wild horses yearly. This pattern appears to correlate with changing climatic conditions. The Ochoco wild horses appear to be self-regulating. An AML of 125-150 needs to be considered.
- 2) Establishing in this EA an AML of 12 to 57 is detrimental, arguably suicidal, to the genetic diversity and viability of this herd over time. A population of 12 to 57 is far below what the BLM-FS retained geneticist suggests as a “minimum” for continuation of any herd, that being 150-200 wild horses with 50 effective breeding animals (SEE BLM HANDBOOK).
- 3) The Ochoco habitat for wild horses has established, fluctuating, mild to severe climatic conditions. Suggesting an AML of only 12-57 wild horses in this herd puts the horses at high risk for extirpation in severe inclement weather conditions.
- 4) Maintained is, this herd is part of a metapopulation wherein numbers, if threatened, can be replaced from other herds. This statement is contrary to the 1971 Law, THE WILD-FREE ROAMING HORSE AND BURRO ACT wherein the law clearly states the horses are to be “where found.”
- 5) 4000 sheep, as well as an undetermined number of deer, elk, porcupines, and gophers are a part of this habitat. In this EA, scientific, fact-based evidence of numbers of species in this area as well as their use and damage of this area seasonally and over multiple years has not been documented. The National Academy of Scientists in its evaluation of wild horses and burro herds points out AMLS are often based on “politics” (who has the power) and not on appropriate resource evaluation and allocation. Without fact-based scientific evidence the conclusion wild horses have done damage to this area, and are in jeopardy in this area with a resultant need to lower the AML to 12-57 is an arbitrary, capricious decision. Instead of a rush to this decision an EIS needs to be done with a decision being made on a fact-based platform.

OPINION: A fundamental question needs to be addressed today. With the loss of wildlife and wildlife habitats, do we want wildlife and habitats that do, in fact, sustain them. Or are we willing to give wildlife, including wild horses and burros over to pleasure and profit-making enterprises wherein our public land no longer is public but private, special interest-based holdings. Then, are we willing to hurdle unfounded, non-fact based accusations at minorities attempting to deny them equitable access to our resources. It is going on with Blacks, with Latinos, with wild horses and burros...can we...do we want to stop it and work to give each a slice of the pie.

Bonnie Kohleriter