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Comments: I have been participating in the census count of the wild horses for 10 years up in the Ochoco National Forest. I have visited the area many other times of the year specifically to view the wild horses. Those two points of contact as well as being a lifetime horse owner, trainer, and horse advocate have given me experiences to draw from as I consider the proposed plan for the horses. I've reached the following conclusions and observations concerning the management of this very special, unique herd.

First and foremost, wild horses are protected under the Wild Horse and Burro Act. If their herd numbers drop from the current level of 135 to 50 you will have managed them into the ground and defeated your goal of protecting them. Dr. Gus Cothran from Texas A&M as well as many other experts recommend a herd level of 250 to maintain genetic diversity, which makes sense, 50 does not. The very reports you reference include the higher hml as the recommended amount. If you go back over the records of the numbers each year it has been 120-130 for many years. Some horses were lost to a shooting. Some horses were lost to getting locked into a pasture without feed in winter and various other causes. If there were only 8-50 horses and some die from the causes listed above that ends the herd.

The justification given for limiting numbers is the range cannot support a higher number. The range has successfully supported the current number of 135 over the 10 years I have participated in the census. The areas around a few springs that have received damage could easily be fenced and a spring fed trough provided. Many volunteers would gladly do any work required for free and provide material. I grew up on a ranch and we implemented many practices such as this to limit the damage our cattle did to the range. Another practice for managing livestock on a range is moving them. You can open gates, put out salt, those actions encourage horses to migrate into different areas of the range. I have surveyed the area around the horse camp in the Ochocos extensively. There have only ever been 1-3 horses there every year and the grass is up to my knees and there is a creek running through every meadow. Utilizing that range more would lessen the impact the horses make in the other areas. Develop a winter range within the HMA and open gates to allow horses to naturally move there. Trees such as aspen provide alternative feed in winter for many animals not just horses. Improve the winter range by planting more aspen and brush horses eat in winter. They don't just eat grass.

Lastly, these horses are desirable and have good conformation. They may not look and move like a quarter horse but that doesn't mean their conformation is poor. Function follows form and they can pick up and move at the drop of a hat, covering sometimes 28 miles in a day without ever going lame. I would say their conformation is allowing them to do all that nature intended. Since the Mustang revolution many people have come to value the mustangs smaller stature, their hardiness, surefootedness, intelligence and trainability over big muscles and tiny heads of the Quarterhorse. We've learned that a cowhocked horse has more ability to maneuver, climb and turn. The traits of the Mustang have been bred out of the modern horse to its misfortune all for an eye pleasing look. So please remove your statement that these horses have undesirable size and conformation so that makes them less likely to be adopted. It's simply not true and a local organization has adopted out every single Ochoco horse made available proving again that these horses are desirable and adoptable. I hope these considerations will be taken into account and implemented. I hope the love that the community and world has for the Ochoco wild horses will guide all your decisions.